

IN THE SUPREME COURT OF FLORIDA

THE FLORIDA BAR,

Complainant,

v.

MICHAEL ALEXANDER HURCKES, ESQ.,

Respondent.

Case No. SC2025-1375

RESPONDENT'S AMENDED ANSWER TO PETITION FOR EMERGENCY
SUSPENSION AND MOTION TO DISSOLVE

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PRELIMINARY STATEMENT

This proceeding is not an emergency requiring the extraordinary sanction of suspension. It is a failed disciplinary petition miscast as an “emergency,” brought nearly two years after the events in question, long after every complainant was refunded or made whole.

The Florida Bar seeks to impose the drastic remedy of emergency suspension under Florida Bar Rule 3-5.2, claiming Respondent poses an “immediate and serious danger” to the public. But this Court has been unequivocal: emergency suspension is “a drastic remedy” reserved for situations where ongoing conduct places the public in present peril, not to punish past, resolved disputes. See *Fla. Bar v. Maynard*, 333 So. 3d 1138, 1143 (Fla. 2022) (“The purpose is to protect the public, not to punish the attorney.”); *Fla. Bar v. Ratiner*, 46 So. 3d 35, 37 (Fla. 2010).

Here, the Bar’s Petition relies on client matters that were short-lived (typically less than 30 days), refunded, and fully resolved well over a year ago. No client was abandoned. No client suffered harm. The firm has successfully handled over 3,000

matters, and these grievances represent less than 0.7% of that caseload. This Court has rejected emergency suspension in far more serious cases where misconduct, even if proven, did not pose a current threat to the public. See *Fla. Bar v. Kravitz*, 694 So. 2d 725, 728 (Fla. 1997); *Fla. Bar v. Baker*, 810 So. 2d 876, 879 (Fla. 2002) (restitution and corrective measures weigh heavily against suspension).

Moreover, the Bar's narrative omits that the complaints arose from the retaliatory misconduct of a former employee, Sarah Gabr, who was terminated for cause after less than two weeks and then stole confidential client data to solicit clients to her own unlicensed business. See *MAH Advising, PLLC v. Gabr*, No. 2024-CA-006851 (Fla. 13th Cir. Ct. filed 2024). She falsely told clients that Respondent had abandoned their matters and encouraged them to request chargebacks or file grievances.

Respondents immediately cooperated with the Bar, provided all requested records, and issued refunds even in matters where substantial legal work had been performed. Respondent also implemented corrective reforms, including clearer intake protocols, improved communications, and dedicated case assignments.

The Petition also mischaracterizes Respondent's role. Mr. Hurckes primarily serves as a supervising and mentoring attorney who rarely bills for direct work (less than 10% of his time), while associates and paralegals perform and bill for substantive

casework. Delegation of work is not abandonment. See *Fla. Bar v. Condon*, 632 So. 2d 70, 72 (Fla. 1994) (holding that delegation to other attorneys does not constitute client abandonment).

In short, this case involves resolved billing disputes, no client harm, full cooperation, and significant mitigation. It bears none of the hallmarks of an emergency warranting immediate suspension.

For these reasons, and under this Court's precedents in *Maynard*, *Ratiner*, *Kravitz*, *Baker*, and *Condon*, the Petition must be denied.

I. FACTUAL BACKGROUND

The Florida Bar portrays a wave of client complaints as proof of systemic collapse. In reality, these grievances were orchestrated by a single former employee, Sarah Gabr, who after less than 2 weeks as a receptionist was terminated for cause and stole confidential client data misleading clients and spreading falsehoods claiming Mr. Hurckes was doing no work and stealing their retainers. See **Exhibit W**, Affidavit of Hurckes ¶ 4; *MAH Advising, PLLC v. Gabr*, No. 2024-CA-006851 (Fla. 13th Cir. Ct. filed 2024). Beginning in April 2024, Ms. Gabr misled numerous active clients by falsely telling them that Respondent had abandoned their cases, See Ex. W, Aff. of Hurckes ¶ 5. and urging them to request chargebacks or file Bar complaints while retaining her instead. See Exhibit P, at 1060-1084; Ex. I, at

645-692 (client grievance noting misinformation from Ms. Gabr). As a result, several clients initiated chargebacks or filed complaints based on incomplete or inaccurate information.

This triggered unnecessary disputes and 41 bar complaints, she then started after her own competing business without a license to practice law. The firm reported her conduct to the FBI, filed litigation and reported her to the Florida bar. See **Exhibit V**.

Despite this disruption, the firm immediately responded proactively. For each complaint received, the firm:

- Fully cooperated with Bar Counsel and grievance committees; See *Exhibits A-S from 7-1235*.
- Provided detailed responses, records, and communications;
- Issued refunds or honored chargebacks for clients who requested them; See Exhibit T from 1237-1257.
- Ensured that no client was financially harmed or abandoned.

In September 2024, following this surge of chargebacks and nonpayment issues triggered by Ms. Gabr's misconduct, the firm conducted an internal audit of all client accounts. This review identified over 250 matters where legal services had been provided but payment was withheld or reversed in violation of the respective

engagement agreements. See Exhibit W, Affidavit of Hurckes 9. In many of these cases, attorneys, paralegals, and staff had already performed substantial work, and the firm had incurred out-of-pocket expenses such as court filing fees, service costs, and administrative overhead.

In February 2025, the Bar escalated 18 of these matters to the grievance committee, which, to Respondent's knowledge, did not result in any finding of probable cause under Rule 3-7.4. No formal complaints were filed, and no disciplinary proceedings were initiated in connection with those grievances. Having failed to prove their case, the Bar now conducts an emergency action almost two years later, after refunds have been issued, and litigation resolved. See *Exhibit W, Affidavit of Hurckes* 10. The complaints cited in the Petition represent less than 0.7% of that caseload, a statistical anomaly. Most of these clients named in the Petition were refunded or had not even paid any fees. No client was left financially harmed. The record instead shows a functioning firm that resolved disputes responsibly, refunded clients where appropriate, and continues to serve clients daily.

In June 2025, Mr. Hurckes informed Bar counsel that the firm would be pursuing accounts to collections See *Exhibit W, Affidavit of Hurckes* 12. And, where appropriate where legal services were provided, salaries to associates and

paralegals were paid, expenses were incurred such as filing fees, service etc but the fees and expenses had not been pursued through litigation.

Mr. Hurckes traditionally spends the majority of his time training, supervising, and mentoring associates who bill their time to client matters. He personally bills less than ten percent of his time, typically only for hearings or client calls, and does not bill clients for reviewing work product, which is generally handled by associates. His role has long been focused on oversight and strategic guidance rather than daily substantive work. Any fees charged to clients were directly related to associates, paralegal or other work done, and expenses incurred to service these clients.

This was not an act of retaliation against complainants. Rather, it was a standard business response to confirmed unpaid balances after work had been rendered. The firm acted fully within its legal rights, and all accounts referred to collections were first verified as legitimate debts supported by signed contracts and documented work product.

The grievance petition fails to acknowledge that these actions are lawful commercial remedies and do not constitute professional misconduct.

II. GENERAL DENIALS

1. Respondent denies engaging in fraud, dishonesty, or client abandonment.
2. Respondent denies posing any immediate or serious threat to the public or the profession.
3. Respondent denies that any client suffered lasting harm.
4. Respondent affirms his full cooperation with The Florida Bar, including the production of all requested documents, communications, and refund records.

III. RESPONDENT'S COOPERATION AND DISCLOSURE

The Petition ignores Respondent's consistent and extensive cooperation with the Bar. Respondent has answered every grievance, produced contracts, communications, memoranda, and refund evidence, and disclosed firm policies in full. See *Exhibits A–S*. This level of cooperation is a mitigating factor against suspension. *Fla. Bar v. Germain*, 957 So. 2d 613, 621 (Fla. 2007).

Respondent has repeatedly sought to meet and confer with Bar Counsel to resolve concerns professionally. He provided proof of refunds, explained firm practices, and remained transparent at every step. See *Exhibit "U"*. Rather than respond in any kind, the Bar chose to file an emergency petition based on mistaken assumptions that could have been corrected with a phone call. Treating an attorney

who has made every effort to comply as if he were a danger is neither fair nor proportional.

Respondent also undertook reforms after Ms. Gabr's misconduct to safeguard clients: issuing refunds even where retainers were nonrefundable, refunding unused balances even after work was performed, and restructuring matters under dedicated attorneys–paralegal teams. These steps reflect a commitment to client satisfaction and ethical practice.

This is not a lawyer evading responsibility, but one striving to work with the Bar in good faith. Emergency action is unwarranted where cooperation and reform demonstrate the opposite of ongoing risk. See *Fla. Bar v. Shoureas*, 913 So. 2d 554, 557 (Fla. 2005).

IV. NO FRAUD, NO HARM, AND NO EMERGENCY

The Petition collapses on three points:

- **Refunds:** Every client was refunded, eliminating any claim of harm. *Fla. Bar v. Baker*, 810 So. 2d 876, 879 (Fla. 2002). Please See ***Exhibit "T"***.
- **Delegation:** For the past year, when Respondent faced an autoimmune condition, matters were reassigned to licensed attorneys. During this time, Mr. Hurckes's caseload was largely transitioned to other attorneys at the

firm. Therefore, any accusation regarding a case that Mr. Hurckes was not actively finishing requires deeper investigation into the case's status and who was covering it during his medical leave. In December 2024, the investigator failed to recognize that nearly all of Mr. Hurckes's cases and e-filings were being handled by other attorneys during his illness and until his brief return in the summer. Delegation does not constitute abandonment. *Fla. Bar v. Condon*, 632 So. 2d 70, 72 (Fla. 1994).

- **No Ongoing Threat:** Emergency suspension requires current, continuing danger. Past disputes already resolved cannot justify such relief. *Maynard*, 333 So. 3d at 1143.

There is no fraud, no harm, and no emergency. These disputes have long been settled, mostly having been settled in 2023 and 2024. Now the Bar brings an emergency action at the end of 2025 when these disputes have long been resolved having failed to get probable cause in February of 2025.

V. CLIENT-SPECIFIC RESPONSES

The Bar attempts to rely on a series of client grievances to suggest that Respondent engaged in systemic misconduct. In truth, each matter was either resolved through a refund, properly withdrawn with court approval, or addressed with substantial legal work. No client was left abandoned or financially harmed. This Court has

held that “restitution and corrective measures weigh heavily against the imposition of emergency suspension.” *Fla. Bar v. Baker*, 810 So. 2d 876, 879 (Fla. 2002).

A. Dina LaFargue Augustin (Exhibit - A)

Ms. LaFargue retained the firm on March 28, 2024. During the three-week engagement, the firm reviewed over forty emails, conducted intake, and prepared a comprehensive case memorandum. On April 15, 2024, she requested termination. The firm **refunded** her in full within seventy-two hours. See *Exhibit T*, at 18. Her grievance disregards both the substantive work performed and the prompt refund. Under *Baker*, restitution eliminates the basis for emergency relief.

B. Crystal Kapusta (Exhibit - B)

Ms. Kapusta retained the firm on October 31, 2023. A Notice of Appearance was filed on her behalf, and the firm litigated a Motion to Vacate on November 20, 2023. Despite documented filings, she filed a grievance after terminating representation. The firm **refunded** her in substantial part, even though legal services were rendered. The record demonstrates that she was represented, filings were made, and restitution occurred.

C. Collin Schneide (Exhibit - C)

Mr. Schneide retained the firm on June 5, 2024. The firm completed intake, drafted a case memorandum, and began preliminary strategy. On July 5, 2024, he terminated the engagement. The firm **refunded** him in full, despite having already completed work. See *Exhibit T, at 21*. His grievance was also influenced by an error in a draft website page, not by any actual misconduct.

D. Christopher Hintz (Exhibit - D)

Mr. Hintz agreed to a \$3,000 retainer but paid only \$300. Despite this substantial shortfall, the firm proceeded in good faith by conducting intake and preparing a legal analysis that exceeded the value of his partial payment. Mr. Hintz subsequently elected not to move forward with his matter.

His grievance mischaracterizes his dissatisfaction as misconduct, but the record shows otherwise: the firm delivered services proportionate to, and greater than, the amount paid. No refund was owed, no client harm occurred, and no abandonment took place.

E. Christopher Collins (Exhibit - E)

Mr. Collins retained the firm on November 9, 2023, under an internal payment plan, but he failed to make any payments under that arrangement. Nevertheless, the

firm advanced his matter: a complaint was filed in January 2024, and service of process was perfected in May 2024. On June 27, 2024, Mr. Collins terminated representation citing communication issues. The firm immediately moved to withdraw, and the court granted the motion.

Mr. Collins' grievance disregards the fact that litigation had been properly initiated, advanced, and concluded in accordance with procedure. This Court has long recognized that communication issues, without actual abandonment or prejudice to the client's case, do not warrant suspension. *Fla. Bar v. Fuller*, 389 So. 2d 998, 999 (Fla. 1980).

F Geraldine Bletsch (Exhibit - F)

Ms. Bletsch retained the firm on January 8, 2024. A case memorandum was prepared within a week. On January 15, 2024, she disengaged. Her refund requests initially went unanswered because her emails were filtered as spam, but once discovered, the firm **refunded** her in full. See *Exhibit T, at 19*. Her grievance omits this resolution.

G. Brooke Miller Albright (Exhibit - G)

Ms. Albright retained the firm on March 21, 2024. Intake was completed, and a case memorandum was prepared. Less than three weeks later, on April 12, 2024,

she terminated representation. The firm **refunded** her in full, despite work performed. See *Exhibit T, 6-10*.

H. Arnold Campbell (Exhibit - H)

Mr. Campbell retained the firm on July 9, 2024. Intake and a case memorandum were completed. On August 12, 2024, he terminated representation and was **refunded** in full. See *Exhibit T, at 4*. His grievance fails to account for the work product provided or the refund issued.

I. Charles Hayes (Exhibit - I)

Mr. Hayes retained the firm on April 3, 2024, and terminated representation by April 30, 2024. The firm **refunded** his retainer in full. See *Exhibit T, Page no. 3*. Importantly, Mr. Hayes was misled by former employee Sarah Gabr, who stole firm data and falsely told clients their cases were being mishandled. His grievance reflects her misconduct, not the firm's.

J. William Vernon (Exhibit - J)

Mr. Vernon retained the firm briefly in 2023. Intake was initiated, but the engagement ended almost immediately thereafter. A full refund was provided. See *Exhibit T, Page 2*. His grievance mischaracterizes the scope of representation, which never advanced beyond the intake stage. To the extent that any account may

incorrectly reflect an outstanding balance, Respondent respectfully requests that The Florida Bar meet and confer with undersigned counsel so the matter may be clarified and resolved.

K. Veto Kravchenko (Exhibit - K)

A subcontractor of Mr. Kravchenko retained the firm for a construction lien. A lien was filed in good faith, based on sworn subcontractor information. When a licensing dispute arose, the matter was promptly referred to specialized counsel. No misrepresentation was made, and no client was abandoned. The referral underscores diligence, not misconduct.

L. Tiffany Clark (Exhibit - L)

Ms. Clark sought emergency custody representation on April 1, 2024. Intake revealed she misrepresented jurisdiction, claiming Florida when the matter was in Maryland. The firm attempted to locate pro hac vice counsel, but none accepted due to her misstatements. The firm withdrew and **refunded** her. *See Exhibit T, Page no.13.* Her grievance omits her misrepresentations and the refund.

M. Theresa Quirion (Exhibit - M)

Ms. Quirion retained the firm on March 20, 2024, and demanded a refund by March 22, only to reinstate representation on March 25 and then terminate again.

She filed chargebacks, which were denied, but the firm **refunded** her regardless.

See *Exhibit T, Page no.11*. Her erratic engagement demonstrates that the firm acted responsibly by refunding rather than prolonging disputes.

N. Simon Fisher (Exhibit - N)

Mr. Fisher engaged the firm for compliance and litigation. Extensive calls, legal memoranda, and compliance work were documented. He later suffered from alcoholism and memory issues, which contributed to confusion. He pursued a chargeback, which was denied, and later filed a frivolous federal lawsuit. The grievance omits the substantial work product provided. Every single allegation in Mr. Fisher's complaint can be contradicted by recorded calls with Mr. Fisher himself!

O. Laura Wright (Exhibit - O)

Ms. Wright retained the firm under multiple surnames, complicating docket searches. Intake was incomplete and she changed her phone number and did not provide us with a new one, the firm attempted to file a Notice of Appearance. When it became clear her case was in a different county, the firm **refunded** her retainer. See *Exhibit T, Page no.16*. Her grievance is rooted in her inconsistent information, not misconduct by the Respondent.

P. Geraldine Marmol (Exhibit - P)

Ms. Marmol retained the firm on November 21, 2023, making only a partial retainer payment. Intake was completed, and the firm prepared a case memorandum and a draft Motion to Establish Paternity. We provided her with our contact information however, it appears she mistakenly communicated through a non-firm number, causing confusion. When her matter was terminated, the firm **refunded** her \$1,750 in good faith. See *Exhibit T, Page no. 1*.

Q. Katelynn Curran (Exhibit - Q)

Ms. Curran retained the firm on December 28, 2023, paying a \$4,000 retainer via Affirm. The firm conducted intake, opened her file, and attempted to move her matter forward. Following her termination of services, the firm immediately prepared to refund her retainer. Respondent and staff reached out to both Ms. Curran and her counsel to confirm where to send the refund. See *Exhibit T, Page no. 20*. Neither Ms. Curran nor her attorney ever responded to those inquiries.

As of today, the funds remain fully available and will be returned immediately upon receipt of proper instructions from Ms. Curran or her designated representative. The record therefore confirms that no client harm has occurred in this matter: Respondent has preserved the funds, made good faith efforts to deliver them, and stands ready to remit payment.

R. Andrew Greene (Exhibit - R)

Mr. Greene retained the firm in 2024. Intake and a case memorandum were completed. He terminated representation early, and a refund was processed. His grievance ignores the fact that he received a work product and a **refund**. See *Exhibit T, Page no. 15*.

See Each of the nineteen client matters cited by the Bar reflects the same underlying reality. The majority of these clients were engaged for less than one month and were still within the onboarding stage of our client experience. The Bar is correct that little substantive work was performed on these files; however, that is precisely why, when the attorney–client relationship proved not to be a fit, the clients were provided full refunds. In most cases, they were also referred to other attorneys better suited to assist them.

No client was abandoned. No client suffered financial harm. To characterize these short-lived and fully resolved matters as evidence of “systemic misconduct” is contrary to both the record and this Court’s precedent, which requires proof of ongoing, imminent danger before the extraordinary sanction of emergency suspension may be imposed. See *Fla. Bar v. Maynard*, 333 So. 3d 1143 (Fla. 2022); *Fla. Bar v. Kravitz*, 694 So. 2d 725, 728 (Fla. 1997).

VI. RESPONSE TO FEDERAL COURT ALLEGATIONS AND SCHIPANI COMPLAINT

1. The Petition references federal proceedings in the Middle District of Florida, Fort Myers Division, and cites the complaint of opposing counsel, attorney Philip Schipani, as evidence of misconduct. These references are misleading and incomplete.
2. The federal docket demonstrates that Respondent actively participated in the litigation: filing a Notice of Appearance (Doc. 23), motions (Docs. 25, 35, 41), and an Answer with defenses (Doc. 41), and attending multiple hearings (Docs. 20, 47, 53, 85). These filings reflect ongoing engagement and diligence, not abandonment.
3. The November 1, 2024 hearing was missed due to a PACER notification error where service was not sent to our e-service address, not intentional neglect. Respondent immediately filed a written explanation (Doc. 46) and the Court issued no findings of dishonesty or misconduct. The only sanction entered (Doc. 58) was reimbursement of opposing counsel's travel expenses. Which Mr. Hurckes paid out of his own pocket on a matter he took pro-bono. This isolated procedural matter does not establish "immediate and serious harm" to clients.

4. The Bar’s claim of a “pattern of misconduct” based on this case is unfounded. Court filings show compliance with scheduling orders, extensions properly requested (Doc. 33), and hearings continued without prejudice to the client.
5. The Schipani complaint is retaliatory. The docket shows that Mr. Schipani himself failed to timely respond to a Motion to Dismiss, prompting a Show Cause Order (Doc. 27). The Court later denied the motion (Doc. 31) but imposed no sanctions against the Respondent for filing it. Mr. Schipani’s grievance mirrors his litigation hostility and a separate fee dispute, not legitimate client harm. See *Exhibit “S.”*
6. At all times, the Respondent acted in good faith. The federal court imposed only a limited cost sanction, not discipline or a finding of unfitness. The inclusion of these matters in the Petition is misleading and disproportionate.
7. Under the Florida Standards for Imposing Lawyer Sanctions, numerous mitigating factors weigh heavily against the imposition of emergency suspension.

VII. PRAYER FOR RELIEF

WHEREFORE, Respondent respectfully requests that this Court:

1. Deny the Petition for Emergency Suspension;

2. Dissolve any suspension imposed under Rule 3-5.2(b); and
3. In the alternative, impose lesser remedies such as monitoring or probation if deemed necessary, consistent with this Court's precedent in *Maynard*, *Baker*, and *Ticktin*.

CONCLUSION

The Florida Bar's Petition for Emergency Suspension fails as a matter of fact and law. Every client identified in the Petition was refunded. No client was abandoned, no funds were misappropriated, and no ongoing harm exists. The grievances were long settled years ago and refunded represent less than one percent of Respondent's caseload and arose largely from the retaliatory misconduct of a terminated employee who stole client data and misled clients.

This Court has been unequivocal: emergency suspension under Rule 3-5.2 is "a drastic remedy" reserved for circumstances where an attorney's ongoing conduct poses an "immediate and serious danger" to the public. *Maynard*, 333 So. 3d at 1143. It is not a tool for punishing administrative errors, resolved refund disputes, or isolated procedural lapses. See *Baker*, 810 So. 2d at 879; *Kravitz*, 694 So. 2d at 728.

Respondent has demonstrated full cooperation, voluntary restitution, corrective reforms, and a clean disciplinary record. These mitigating factors, recognized

under the Florida Standards for Imposing Lawyer Sanctions § 9.32, weigh heavily against the imposition of emergency suspension.

For these reasons, the Petition should be denied, and any suspension dissolved.

Respectfully submitted,

/s/ Michael A. Hurckes

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CERTIFICATE OF SERVICE

I certify that this document has been filed via the Florida Courts E-Filing Portal with The Honorable John A. Tomasino, Clerk of the Supreme Court of Florida; that a copy has been provided via the portal to Patricia Ann Toro Savitz, Staff

Counsel, The Florida Bar, psavitz@floridabar.org; and via email to Jennifer Robyn Dillon, Chief Branch Discipline Counsel, rdillon@floridabar.org; on this 15th day of September, 2025.

Respectfully submitted,

/s/ Michael A. Hurckes

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CERTIFICATE OF COMPLIANCE

I certify that this document complies with the font and word count requirements of Florida Rule of Appellate Procedure 9.210(a)(2). This document is prepared in

14-point Times New Roman font and contains fewer than 13,000 words.

/s/ Michael A. Hurckes