

IN THE SUPREME COURT OF FLORIDA
(Before a Referee)

The Florida Bar,
Complainant

v.

Case No. SC20-233

Terra Neshonda Carroll
Respondent

The Florida Bar File No.
2020-30, 516 (12A)

AMENDED NOTICE OF INTENT TO SEEK REVIEW OF REPORT OF
REFEREE

Respondent requests this Court review the report of the Referee in this matter.

Respondent seeks review of the report of the Referee because the Referee have intentionally denied her back entry into the zoo on hearing, where Respondent contacted bothll he and the Florida Bar. Respondent requested her hearing to occur in person and that request was denied. Respondent also request review of the report of the Referee for the following reasons:

1. The former Florida Bar President was reported by a federal judge, she used a disbarred lawyer to be in contact with her client (with no attorney present), draft documents and pleadings for her client (that were submitted in the case), attend a presentencing meeting with her client (with no attorney present for the presentencing investigation), have the disbarred lawyer text her when he wouldn't reply to lawyers in her firm, knew that he at times was the only person constantly contacting her via text or email while the case was pending, allowed the disbarred lawyer to sit at counsel table and allow a judge to refer to him as an attorney without correcting him, referred to him as a paralegal to the federal judge and then changed her story with the Florida Bar by calling him a prison expert, told her client to hire him and pay him.
2. Respondent has bar complaints that have been open since January 2018, that the Florida Bar has not closed and still choose to harass her about.
3. Respondent has been bullied into paying the Florida Bar extra money for reviewing her quarterly reports, although this Court did not order the fee and the Florida Bar had no rule saying the fee had to be paid.

4. Respondent has been discriminated against by the Florida Bar and Judge Peter Bell.
5. Judge Bell attempted to violate Respondent's constitutional rights by providing the Florida Bar with personal cell phone records that belonged to Respondent, from the date of her suspension until October 3, 2018 during a hearing using authentication as an excuse.
6. During that hearing Judge Bell ignored Respondent each time she advised that she could not "hear" during the hearing, at one point Respondent advised I heard none of her argument and Judge Bell did not respond, it was obvious that someone was intentionally allowing Appellant not to hear what was being argued during the hearing.
7. Judge Bell was advised that Respondent wanted to be deposed on the same day as the Florida Bar's witnesses, Judge Bell ordered Respondent be deposed but not the Florida Bar's witnesses. Respondent was never provided the opportunity to depose Florida Bar witnesses before the hearing.
8. Respondent has not been treated the way other lawyers have been treated regarding the Florida Bar Rules she allegedly broke, Respondent knows that the Florida Bar has never gone after another

attorney in Manatee County regarding a refund in the way they came after her.

9. Respondent also knows that she was not pursued in the same manner that the Florida Bar's former president and a disbarred attorney were treated once they were reported to the Florida Bar by a federal judge after the former president of the Florida Bar's client complained to the Federal Judge about the unauthorized practice of law and the fact that the former president of the Florida Bar had hired a disbarred lawyer to do the work on his case.
10. Respondent has two paralegal degrees, one from Indian River State College and one from the University of Central Florida, Respondent drafted documents for a legally blind attorney and documents she's permitted to draft as any paralegal in Florida would be permitted to draft.
11. Judge Peter Bell and the Florida Bar ignored emails regarding Respondent being unable to enter her hearing via Zoom.
12. The Florida Bar had completed their whole entire case prior to Respondent being allowed to enter the hearing via Zoom.

13. During the afternoon, after Respondent was told the hearing would be "open" or the link would be open, Respondent again had to request to be allowed to enter into the hearing.
14. Respondent has photographic and email proof, the belief that Judge Bell did this for discriminatory reasons is because he attempted to violate Respondents' Fourth Amendment Rights by illegalling providing the Florida Bar with her Google Voice/Cell Phone Records. During that hearing, the audio was at times unable to be heard when the Florida Bar attorney was speaking to the judge and the hearing began to fast forward at the end of the hearing when a "live" hearing should not have done so.
15. The report of the Referee incorrectly states that Respondent charged a collected fee of \$6500, Respondent received a down payment of 6,500 toward her \$15,000 fee, where she refrained from collecting \$3,500 until the docket sounding date which would have occurred March 1, 2018 and would not ask for the remaining \$5,000 with the expectation the case would be dropped on Mr. Guffey would be found not guilty at trial and he would need the \$5,000 to begin at life again after spendy more than a couple of decades in prison.

16. The Public Defender's Officers had previously requested discovery in Mr. Guffey's case, Respondent, Mr. Guffey, and the Public Defender's Office submitted a stipulation for substitution of counsel in November 2018. After discovery was not received from the Office of the Public Defender, Respondent requested discovery again in December. The way that the Manatee State Attorney's Office manages discovery is that a subsequent attorney must retrieve discovery from the previous attorney.
17. Mrs. Morgan agreed to take on and resolve Respondent's cases, neither Mrs. Morgan nor Respondent expected a suspension during the previous case before the Florida Bar, Mrs. Morgan had received "free" help from Respondent after she was released from Florida State Hospital on several serious felonies that went to trial.
18. Mrs. Morgan was on the appointed attorney list at the time she accepted Respondent's cases, there was enough owed by each client that would have either been the equivalent or very close to the amount the JAC paid Mrs. Morgan for serious felonies. All of the cases that Respondent proceeded to trial with Mrs. Morgan on were Court appointed cases.

19. There was never an agreement for Mrs. Morgan to pay Respondent or Respondent to pay Mrs. Morgan. Respondent provided the Florida Bar with text messages confirming that her former clients were instructed to pay Mrs. Morgan.
20. Respondent was limited regarding the number of pages she was allowed to submit her response, Respondent provided several dates of text messages and emails and a one page statement.
21. There was no testimony that Respondent spent hours speaking with Mrs. Sharie the day of the meeting, Respondent spent hours on the phone with Mrs. Sharie prior to being suspended.
22. Respondent also expected Mr. Guffey's trial to be resolved in March 2018 and motioned this Court to delay her suspension to complete the trial, of course she was already prepared, the case was to be resolved within speedy trial period, as she advised this Court in her January/February 2018 motion.
23. There was NEVER ANY TESTIMONY OR PROOF Respondent extensively communicated with Mrs. Sharie.
24. Respondent motion to this Court proves she had already reviewed the discovery because she advised this Court she was ready to proceed to trial in March 2018, Respondent had been

provided unofficial discovery in December 2017 and they official discovery in January 2018, after she requested a hearing and the circuit ordered the Office of the State Attorney to provide Respondent with discovery.

25. There was NEVER any TESTIMONY by Mrs. Morgan regarding that Mrs. Morgan was provided with anything other than case law research that Respondent gave, preparing for a motion hearing when your expecting to be reinstated is not unauthorized practice of law, telling someone not to mention something to someone is not the practice of law. Respondent never provided anyone with anything that could be viewed or said that the hearing had already been prepared for. Researching is not practicing law, and paralegals help attorneys prepare for hearings all the time.
26. Telling someone to ask from an individual cell is not the practice of law, after they have been beat up because of their charges.
27. There ARE NO TEXT MESSAGES or TESTIMONY stating or advising Respondent that Mr. Guffey had been advised of the conversations and ther were no messages passed to Respondent from Mr. Guffey.

28. There was only testimony that by Mrs. Morgan that Respondent had provided her with case law, paralegals do this every day for attorneys.
29. The August 11, 2018 email again advises Mrs. Sharie not to discuss anything with her brother, the email also advises that HER WORRIES SHOULD BE DISCUSSED WITH HIS ATTORNEY AND COMMUNICATED THROUGH THE ATTORNEY.
30. Forwarding discovery is not providing work, and Respondent is accused of doing no work prior to her suspension although the research she forwarded, all found on the internet from December 2017 by googling the victim's name or utilizing the department of corrections websites or clerks of courts website were provided to Mrs. Morgan prior to being forwarded to Mrs. SHARIE, its extremely discriminatory to accuse a person of not doing work and then stating that the work was improperly shared with his new attorney and his sister. She was entitled to "proof" Respondent had done work.
31. There was NO INJURY, THE CASE WAS DROPPED.
32. Mrs. Morgan signed the subpoenas that Respondent drafted emailed to her, she emailed back, and then sent to a process server.

33. At no time has Respondent ever directed Mrs. Morgan how to proceed while being suspended. Respondent never asked Mrs. Morgan for the discovery in Tyrone Brown's case or to review it, Respondent did anything a former attorney or a paralegal would have done once the realized the discovery had never been requested or provided. Respondent never even researched or asked whether Mrs. Morgan DID request discovery or receive it.

34. On August 17, 2017 the Office of the Public Defender filed the same document Mrs. Morgan, a former public defender filed on June 12, 2018, discovery was not provided until June 13, 2018 a day later. The email was sent to Mrs. Morgan on June 4 but discovery wasn't requested AGAIN until June 12, 2018. Respondent stipulated in as at the attorney in November 2017 and Mrs. Morgan stipulated in in February 2018, Respondent did not speak with or correspond with Mrs. Morgan prior to the depositions that she appeared for in the case on two different dates, there's no way Mrs. Morgan was not working to resolve the cases where she resolved a different case, and corresponded with counsel of a codefendant on a different case without speaking with or corresponding with Respondent about those cases, at the hearing Respondent only expected to respond

regarding Mr. Guffey not about the other cases that Mrs. Morgan also stipulated to that had once belonged to Respondent.

35. At the hearing the Referee said he would not consider Mr. Brown because Respondent was ambushed by the allegations during the hearing, Mr. Brown was brought up during argument, he was not apart of the allegations that were sent to the Referee.
36. Respondent advised the attorney for the Florida Bar that she would be reporting her regarding her harassing her intentionally and the way she spoke to her, in ways she could never speak to a white attorney, Respondent had this issue and reported Matthew Flicker as well, the prior Florida Bar counsel.

WHEREFORE, Respondent requests this Court review the report of the Referee in this matter.

CERTIFICATE OF SERVICE

I HEREBY AFFIRM that a copy of the foregoing has been served on opposing counsel, Katrina Brown Kschaffhouser@floridabar.org, 2002 North Lois Avenue Suite 300, Tampa Florida 33607; Tiffany Roddenberry tiffany.roddenberry@hklaw.com 315 South Calhoun Street 600 Tallahassee, Florida 32301; Kevin Cox kevin.cox@hklaw.com 315 South Calhoun Street 600 Tallahassee, Florida 32301 on August 10, 2021.

CERTIFICATION OF FONT SIZE

I hereby certify that this document complies with the requirements of Rule 9.210(a)(2) regarding font type and size.

_____/s
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