

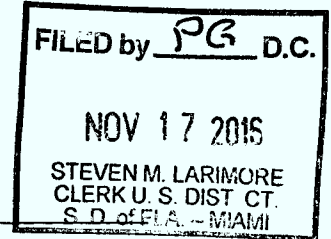
UNITED STATES DISTRICT COURT  
IN THE  
SOUTHERN DISTRICT OF FLORIDA

ROGERIO CHAVES SCOTTON,  
PLAINTIFF,

CASE NO: \_\_\_\_\_

vs.

KRISTIN FIGUEROA-CONTRERAS,  
DEFENDANT,



COMPLAIN FOR:

- A. ACTUAL FRAUD
- B. SHAM DEFENSE
- C. PROMISSORY FRAUD
- D. MISREPRESENTATION
- E. FRAUDULENT MISREPRESENTATION
- F. LEGAL MALPRACTICE
- G. FALSE ADVERTISING
- H. NEGLIGENCE
- I. ANTICIPATORY REPUDIATION
- J. BREACH OF DUTY
- L. FALSE PRETENSES

cat/div 1983/550/mia  
Case # 12 cr 60049 FAM-1  
Judge Rosenbaum  
Motn lfp yes Fee pd \$ 0  
Receipt # \_\_\_\_\_

For his complaint against lawyer Kristin Figueroa-Contreras ("DEFENDANT"), Plaintiff Rogerio Chaves Scotton ("PLAINTIFF") complains and alleges as follows:

1. At all times material here to, Plaintiff Rogerio Scotton was a Florida resident.

2. At all times material here to, Plaintiff was a Florida resident [currently in Federal Custody].

3. At all times material here to, defendant Kristin D. Figueroa-Contreras was a licensed lawyers approved to practice law in the state of Florida.

4. At all times material here to, Defendant Contreras has made promisses and has agreed to competently provide legal service as set for below.

5. Venue is proper in this judicial district and circuit because (a) the transactions described here in were entered into there and/or (b) the tortions conduct described occurred and caused serious losses, prejudicial damages and damages there and/or (c) Defendant Contreras agree to be subject to this lawsuit there.

**ALLEGATIONS COMMN TO ALL CAUSE OF ACTION**

6. On or about November of 2014, Defendant Contreras undertook representation of Plaintiff Scotton in connection with Plaintiff's direct appeal rights as a federal criminal defendant.

7. The representation was marred by numerous acts of fraud including actual fraud, sham defense, promissory fraud, misrepresentation fraud misrepresentation, legal malpractice, false advertising, negligence, anticipatory repudiation, breach of duty, and false pretenses.

**A. ACTUAL FRAUD.** Defendant contreras agreed to represent Plaintiff Scotton in that she would effectively and ably assist Plaintiff Scotton to present his criminal appeal brief in the court of Appeals for The eleventh Circuit. Her failure to prepare an appeal brief has caused serious injury to Plaintiff who relied upon defendant to perform this task.

**B. SHAM DEFENSE,** Defendant Contreras received \$62,000.00 advance from the \$120,000.0 she quoted to assist Plaintiff in his criminal direct appeal. The request was made with bad faith promises to provide legal representation in Plaintiff's direct appeal because there was no signed contract. After accepting the advance fees, the Defendant's statement that she would not withdraw the court-appointed attorney but rather she would be working together with him in the Plaintiff's direct appeal was fraud. No defense must mean a "sham defense". Defendant took the money and provided no service.

**C. PROMISSORY FRAUD,** Defendant Contreras accepted the fees from Plaintiff without performing any of promised legal assistance toward Plaintiff Scotton's direct appeal in front the Eleventh Circuit Court of Appeals. The evidence hereby attached proves that Defendant had made false statements in working together with the court appointed attorney Richard Klugh and such statement was a serious violation of Federal Courts procedure.

Indeed, court appointed attorney has asserted in a letter that he "never" received any input from Defendant Contreras towards Plaintiff's direct appeal.

**D. MISREPRESENTATION**, Defendant Contreras has made disgraceful (as a license attorney) false and misleading statements to Plaintiff, his friends and family in the matter of law and in the matter of her representation of Plaintiff in his direct appeals.

First, Defendant Contreras undertook her commission in this matter without signed contract, accepted the amount of \$62,000.00 [down payment from the \$120,000.00 requested] from Plaintiff without defining the legal services offered to Plaintiff toward his direct appeal.

Second, the Defendant Contreras engaged in disgraceful behavior by making false alarming statements to Scotton's elderly and infirm parents, and further misled Scotton's family by claiming she could be working with Scotton's court appointed counsel. Plaintiff has relied on Defendant false statements and misrepresentations with she knew as a licensed attorney were wrong. Defendant Contreras has also submitted false affidavits regarding her conduct to the Florida Bar.

**E. FRAUDULENT MISREPRESENTATION**, Detrimentally Plaintiff has rely on Defendant Contreras false statement that she knew as a license attorney to be false and was made recklessly deceitful.

furthermore, Defendant Contreras has submitted a forgery and false contract agreement along with a forgery and false affidavit

to the Florida Bar after Plaintiff filed his complaint against Defendant in order to cover-up her disgraceful grossly fraud. For this alone conduct Defendant Contreras license should be terminated.

**F. LEGAL MALPRACTICE.** Plaintiff Contends that defendant Contreras has failed to render Plaintiff any professional services using the skills, prudence, and diligence that are expected from any attorney. Rather Defendant Contreras has engaged in activities taking advantage of two old people in distress, and Plaintiff; made false promises to provide Plaintiff legal assistance in his direct appeal.

Furthermore, Defendant Contreras began engaging in more deceptive behavior when she began sending to Plaintiff numerous unrelated documents and case-law in an attempt to cover-up her negligent and abusive conduct. Rather than performing the legal assistance promised, after Defendant Contreras had received payment, she refused to refund the money back to Plaintiff and asserts that she was working with the court appointed attorney.

Defendant contreras has caused serious and permanent damage to Plaintiff and by refusing to return the money, she has prevented Plaintiff from retaining another attorney that could provide Plaintiff with with effective legal assistance in his direct appeal.

**G FALSE ADVERTISING,** Defendant Contreras falsely advertised to Plaintiff on numerous occasion of the quality of her services and ability as a competent attorney. She deceitfully her clients into buying false services. This disgraceful behavior cause serious damages to plaintiff as he could not afforded to retained another effective attorney.

**H. NEGLIGENCE**, Defendant Contreras failure to provide Plaintiff with competent service or any service toward his direct appeal. Defendant's conduct was beyond negligence because it was intentional, wanton and completely indifferent to Plaintiff's rights. Defendant's negligence as a license attorney is clearly unprofessional, and an unlawful act by making false representations to obtain an economic advance.

**-I. ANTICIPATORY REPUDIATION**, Defendant Contreras had accepted monetary funds before any contract was submitted or sign by Plaintiff with promises to effective provide legal assistance toward Plaintiff criminal direct appeal. This repudiation has occurred when Defendant unequivocally disavows the intention to perform the legal assistance promises during Plaintiff's Criminal direct appeal.

Plaintiff has given Defendant in numerous occasion two option to resolve this breach of agreement by (1) requesting Defendant to return the money or (2) for the Defendant to filing the notice of appearance to the appeal court and perform the service promised toward Plaintiff's direct appeal. Defendant failure to return the money and failure to appeal Plaintiff's direct appeal.

**J. BREACH OF DUTY**, Defendant Contreras has failure to act as the law obligates and by this violated a legal and moral obligation as a licensed attorney.

Defendant Contreras has obtained monetary funds from plaitiff prior to establishing a retainer contract agreement specifying all legal service promises, fees, hours rates and the signature of Plaintiff's to ensure they have accepted the conditions described in the contracted agreement.

**L. FALSE PRETENSES**, Defendant Contreras knowing that it is a criminal act to obtained monetary funds by misrepresenting with false promises of legal assistance towards Scotton's direct appeal with intent to defraud. In fact after Plaintiff requested their retainer money back, Defendant began into giving more false statements that she was working with the court appointed attorney and also in Plaintiff's immigration detainer issue.

7. At least Defendant Contreras was negligent as a matter of law in view of the foregoing. Defendant claim that she has provide Plaintiff assistance in his immigration detainer issue was intent to cover-up such grossly fraud. The record could only shows a letter allege to be sent to a local ICE office which no one response was obtained. If any effective legal assistance was ever provided (which was not) the record clearly shows that Defendant services was inadequate and falls bellow the objective standard. STRICKLAND v. WASHINGTON, 466 U.S. 668, 104 D. Ct. 2052, 80 L. Ed.2d 674 (1984).

**FIRST CAUSE OF ACTION**  
**(Fraud-against Plaintiff)**

8. Paragraphs 1-7 are incorporated herein by reference as though fully set forth at length.

9. Defendant Contreras obtained monetary founds in the amount of \$62,000.00 as down payment from the \$120,000.00 requested in order to provide to Plaintiff legal assistance in his direct appeal

in front of the court of appeals for The Eleventh Circuit.

10. Defendant Contreras has failed to submitted a notice of appearance to the Federal Court in order to represent and provide legal assistance to Scotton in his direct appeal.

11. Defendant Contreras has taken \$62,000.00 before presenting to plaintiff any contract to described the legal services she will provided to Plaintiff. In fact on more than two occasions, Defendant advised that she will mail such contract agreement and will submitted the notice of appearance to court. Defendant began send numerous documents to Plaintiff that was nothing to do with Plaintiff criminal direct appeal, nothing to do with contract agreement. Rather, Defendant has submitted a immigration documents requesting Plaintiff to sign. As Defendant advice and instructed Plaintiff has reply with the request. Nothing much was done in the ICE detainer issue.

12. Plaintiff contends that, months has passed without any assistance toward Plaintiff direct appeal by Defendant Contreras. Plaintiff requested the money back so that his family could retain another attorney. However, Defendant Contreras then immediantly visited Plaintiff while he was in custody to convince Plaintiff that she will file the notice of appea~~R~~. But, this was after the court appointed attorney had already submitted the appeal brief to the court of appeal.

13. Defendant Contreras continued to mislead Plaintiff and Plaintiff's family by starting that she was working together with the court appointed attorney toward the appeal. The court appointed



has advised Plaintiff that he has never worked with defendant Contreras or even received any input toward the direct appeal (see attorney letter).

14. Plaintiff attempted to contacted Defendant numerous times by Phone, Mail, his family phone, mail and emails. Defendant has failed to respond or communicate with client (Violation of rule 4.1.4).

**SECOND CAUSE OF ACTION**  
**(LEGAL MALPRACTICE-FALSE PRETENSES)**

15. Incorporate paragraphs 1-7 herein by reference as though fully set forth at length.

16. Committed legal malpractices as following:

a) file notice of appear to court of appeal. Plaintiff requested several times for Defendant to file a notice of appear to the court of Appeals for The Eleventh Circuit and Defendant Contreras has refuse and failed.

b) Plaintiff requested Defendant in numerous times to file motion to withdraw the court appointed attorney. Defendant refuse and failed to do so even knowing that she has already taking \$62,000.00 to do those task mention above.

c) Plaintiff requested Defendant to file a motion to release pending appeal and Defendant refuse and could not provide the legal assistance because she failed and refuse to submitted the notice of appear.

d) Plaintiff requested Defendant to correct and file his appeal brief (which Plaintiff draft) and Defendant failure and refuse by not submitted the notice of appear to the district court as promised by the Defendant who has already receive \$62,000.00 without any sign contract.

17. Plaintiff requested Defendant to prepare an invoice for any legal work or assistance she may have perform toward Plaintiff's direct appeal. Defendant failed to do so.

18 FALSE PRETENSES.

Defendant sent a letter to Plaintiff in November of 2014 starting falsely that she could provide Plaintiff with effective legal assistance in his criminal direct appeal. Plaintiff's family and friends that began raising money to retain an effective attorney in order to properly appeal Plaintiff criminal conviction in front the Eleventh Circuit.

Defendant who has represented Plaintiff's friends before, told them that she could help. Therefore, Plaintiff's friends loaned the money to plaintiff and wired this money from Portugal to Defendant. Defendant advised Plaintiff's friends that she would need the amount of \$120,000.00 [One Hundred twenty five thousand dollars) to appeal Plaintiff criminal conviction in front of the eleventh Circuit and a down payment must be received before Defendant could filed any notice of appear in court. Defendant has claim that as soon she receive the down payment she could began into work in the Plaintiff's direct appeal and in the ICE detainer in Plaintiff Immigration case.

19. Defendant offer of her legal assistance to Plaintiff family and friends was made without any contact with or discussion with Plaintiff in the matter of any contract agreement, charges or fee from the legal assistance offered toward his direct appeal.

20. On one occasion Defendant sent an email to Plaintiff's friends in Portugal with some offer of legal assistance that she could provide to Plaintiff toward his criminal direct appeal. Plaintiff has never received a copy of this email or details of any such proposal.

21. Plaintiff was informed by his family that Defendant has undertaken a loan of \$62,000.00 (Sixth five thousand dollar) to effectively provide Plaintiff with legal assistance toward his direct appeal. Not one single document has any specification of fees, hourly rate or a discription of the legal service Defendant would be provided has been given to Plaintiff himself.

22. Defendant has never presented any contract or agreement or proposal to Plaintiff's family or Plaintiff himself prior to accepting the monetary founds of \$62,000.00 or before Plaintiff's official complaint to the Florida Bar. After Plaintiff's complaint to the Florida Bar, Defendant engage in serious and grossly fraud by forgery a contract agreement and false affidavit by a staff claiming that she was retained to do provide legal immigration assistance and section 2255 toward Plaintiff criminal case. The contract is an outrageous and disgraceful attempt of Defendant into cover-up her disgraceful fraud as a license attorney. This court must serious sanction this Defendant because her conduct is beyond to a grossly conduct tolerant by a license attorney.

23. Defendant has violated rules by obtaining funds from clients without presenting an agreed contract of the legal services offered.

24. Plaintiff's representatives request defendant immediately returns the money since Defendant failed to inform the District Court and Appeals Court that she would be representing plaintiff in his direct appeal. Further Plaintiff requires Defendant to immediately refund the money so that Plaintiff may communicate and engage with another lawyer. Defendant already refunded the sum of \$2,000.00 (two thousand dollar) from the \$63,000.00 (Sixth thousand) Defendant had received as down payment.

25. Defendant claims in the misleading contract agreement that she was retained the total amount of \$60,000.00 to deal with the I-247 immigration detainer and potential 28 U.S.C. § 2255. The defendant has not provided the assistance for the ICE detainer, neither has she provided any legal assistance toward Plaintiff criminal case, specially when Plaintiff are currently in his direct appeal.

Plaintiff has numerous time request the money back because defendant has not provided any legal assistance to Plaintiff, specially any section 2255. Hence, Defendant has also submitted misleading documents to the Florida Bar in the attempt to cover-up her unlawful and unprofessionad conduct. Defendant conduct has prejudiced Plaintiff's case to provide an effective presentation to the appeal court in his direct appeal. The damage cause by Defendant extends to losses to Plaintiff race career, the two years of incarceration without performing any racing or receiving endorsements from sponsors. Plaintiff has continued to

suffer serious losses to his racing career due to Defendant's unprofessional conduct.

26. Defendant's negligence of duty, cause a loss and prejudice Plaintiff are clear and intentional malpractice and misrepresentation. LARSON & LARSON PA v. TSE INDUS INC., 22 50 3d 36, 34 (FLA 2009).

Plaintiff has provided sufficient ground to his entitle[ment] or relief and the evidence hereby attached clearly requires a decision in the Plaintiff's favor. BELL ATLANTIC CORP. v. TWOMBLY, 550 U.S. 544, 555, 127 S. Ct. 1955, 167 L. Ed. 2d 929 (2007).

27. This court should seriously consider applying sanctions and awarding punitive damages against Defendant to demonstrate that justice will not and does not tolerate this type of conduct by an licensed attorney, whose act have caused serious damages to Plaintiff and have severely prejudiced him. POLK v. LESLIE POLK & PLUMBING LLC. 70 50 3d 363, 372 (ALA. Cir. app. 2011); BMW NORTH AMERICA INC., v. GORE, 517 U.S. 559, 116 S. Ct. 1589 (1996).

**WHEREFORE, PLAINTIFF PRAY FOR JUDGMENT AS FOLLOWS  
(WHERE SPECIFIED, THE PRAYER IS AS TO ACTION)**

1. As a for actual fraud, sham defense, promissory fraud, misrepresentation, fraudulent misrepresentation, legal malpractice, false advertising, negligence, anticipatory repudiation, Plaintiff prays for actual damage in the sum of one hundred and twenty thousand (\$120,000.00) Dollars.

2. As for breach of duty and false pretenses, Plaintiff prays for permanent damages and punitive damages in the sum of one hundred thousand (\$100,000.00) dollars.

3. As for the punitive damages and cost of the lawsuit, Plaintiff prays that the honorable court incurred herein as Defendant Contreras has acted recklessly, malicious and deceptively as a Florida License attorney and to make clear example to others attorney, Plaintiff request that Defendant Florida Bar License be revoked and a fine judgment sum of two hundred thousand (\$200,000.00) dollars.

4. For a cost such other further relief as the court may deem just and proper.

\_\_\_\_\_x\_\_\_\_\_

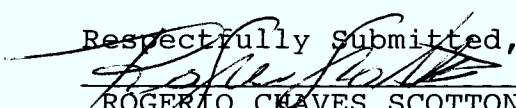
Plaintiff also prays that this court construe this pleading liberally and hold it to a less stringent standard than formal pleading to state valid claims on which litigant could prevail, it should do so despite failure to cite proper legal authority, confusion of legal theories, poor syntax and sentence construction, or litigant's unfamiliarity with pleading requirements. BOAG v. MACDOUGALL, 454 U.S. 36470, L. 2d 551, 102 S. Ct. 700 (1982). Plaintiff contends that pro se pleading are held to a less stringent standard than pleading draft by attorney and will, therefore, be liberally construe. TANNENBAUM v. UNITED STATES, 148 F.3d 1262, 1263 (11th cir. 1998).

CONCLUSION

The issue presented in this lawsuit for this honorable court review are clear and are supported by facts, evidence, affidavit and law that requires a judgment against the Defendant for her illegal and outrageous conduct as an license attorney.

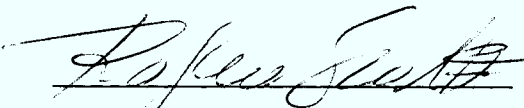
Plaintiff prays that this court would rule in his favor as Defendant has taking monetary funds in the sum amount of \$62,000.00 in bad faith, false pretenses of a criminal representation in assist Plaintiff in his direct appeal, forgery documents and promises of refund \$25,000.00 which has been proved to be another false statement.

Respectfully Submitted,

  
ROGERIO CHAVES SCOTTON  
REG NO: 99370-004  
D. RAY JAMES C.F.  
P.O. BOX 2000  
FOLKTON GA 31537

PROOF OF SERVICE

I Rogerio Chaves Scotton, do certify that this November 10, 2016, I have served the attached lawsuit on the Southern District of Florida in the above proceeding. I have served such lawsuit via United States Postal Service (USPS) first-class mail though D. Ray James C.F. legal mail.

  
ROGERIO CHAVES SCOTTON  
REG NO: 99370-004  
D. RAY JAMES C.F.  
P.O. BOX 2000  
FOLKSTON GA 31537

# EXHIBIT

## A

The letter sent to Contreras on May 10, 2016 with the attached letter from Contreras date September 3, 2015 were she advise to refund \$25,000.00 but such was never refund.



May 10, 2016

NEGRI, TORRES & FIGUEROA-CONTRERAS  
ATTORNEY AT LAW.  
ATTN KRISTIN D. FIGUERO-CONTRERAS  
2030 SOUTH DOUGLAS ROAD, SUITE 214  
CORAL GABLES, FLORIDA 33134 US

RE: UNITED STATES v. ROGERIO CHAVES SCOTTON  
CASE NO: 1260049

FIGUEROA-CONTRERAS,

As you already know, the appeal was affirm by the appeal court after two yeas of sabotage and depravation of rights.

Klugh has complete his mission, in which was given by Rosenbaum and has already submitted a motion to withdraw from the case. Ironic I have requested the appeal court and Klugh itself to withdraw from the case and was deny.

I will attempt to requested the court for a re-hearing, which I believe will be denied anyway due that I have been requested justice and I have been sodomize by everyone involved in the judicial system. No that you care, but that is the truth.

Here is the letter you have send me September 3, 2015 in order to receive some of the money you have taking to work toward my direct appeal. No that I have agree with anything, but my family is very ill, without a car and in financial need.

Before I have to submitted I law suit against you and your firm, I want you to send this money to my mother.

I will not engage into tell you anything any more.  
You know what you have done. In fact the appeal was affirm.


I have been work with a lawyer in California that  
I have the pleasure to meet him when I was in FDC Miami. SO  
he has agree with me and has draft a complaint to filed in the  
matter of the damage your firm has cause me.

I do not have anything to loss at this time, and  
I do not care about nothing. But I will give you the chance  
to do the right thing. Here is your B.S. letter sign by me.

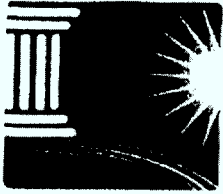
You have claim that the money was to you in order  
to do my 2255 application and you have not done that, and I  
do not wish to be represented by you or your firm in anything  
with respect of my life or legal needs.

Therefore, you need to return the amount of \$25,000.00  
(twenty five thousand and 00/100 U.S. dollars), to my mother  
as you have not done anything toward my criminal case or a 2255.

I will thank you in advance for your imput in this  
matter and to receive the check.

  
Rogerio Chaves Scotton  
REC NO: 99370-004  
D. RAY JAMES C.F.  
P.O. BOX 2000  
FOLKSTON GA 31537

*may 10, 2016*



# NEGRI, TORRES & FIGUEROA-CONTRERAS

ATTORNEYS AT LAW • ABOGADOS • ADVOGADOS

3 September 2015

*Via USPS Priority Mail Express with Delivery Tracking*

Rogerio C. Scotton  
Register No. 99370-004  
D. Ray James Correctional Institution  
Inmate Mail/Parcels  
P.O. Box 2000  
Folkston, GA 31537

**Re: Rogerio Chaves Scotton**

Dear Mr. Scotton:

Your response is requested. I thank you for your tremendous patience over the past month, as I have experienced several unrelated and unanticipated delays in reviewing and completing the multiple packages to send to you under separate cover. We are sending each topic (i.e. the very voluminous FOIA response with flagged redactions/withholdings, FOIA response with audio/video recording, confirmation of administrative appeal and draft FOIA complaint; information and response re: immigration detainer/bond request; civil grievance documents and draft (Section 1983 civil rights) complaint; bond motion and supplemental filing, etc.) separately from this letter; current Fedex case information, etc). We are also returning to you all original files, of which we have made the requested copies.

As I mentioned in earlier correspondence, because you have chosen to terminate us prior to completion of the anticipated representation, I absolutely agree that fairness dictates that you should be entitled to a return of a portion of the attorney's fees (Engagement Fee) paid to our law firm by third-party Joao Lino. Pursuant to your telephone conversation with our paralegal Emilio D'Arce, we would be willing to comply with your request and return a portion of the Engagement Fee paid by Mr. Lino, directly to you. Because we were hired on a flat-fee, immediately earned basis rather than an hourly (retainer) basis, we did not keep an exact record of all time spent working on your case. I have had to review all time (including the travel and prison visits) and approximate. Emilio and Kimiko have reviewed their phone calls, mailings, photocopies, PACER downloads and other administrative tasks.

As Mr. D'Arce advised you, of the \$60,000 flat-fee Engagement Fee, we offer to return to you the amount of \$25,000.00 (Twenty Five Thousand and 00/100 U.S. Dollars), and we consider this sum a fair settlement of the time spent thus far/work already done, based on our standard hourly rate. As you know and as is posted online, my standard hourly rate is \$400/hour. Most administrative (non-legal) tasks in your case, however, were completed by our senior paralegal and an administrative assistant. Their hourly rates are much lower, at \$120 and \$85 respectively.

Pursuant to Mr. Lino's request and your request, the separate costs deposit paid to us, i.e. \$2,000.00 (Two Thousand and 00/100 U.S. Dollars), was unused and returned to you in its entirety at the beginning of the representation via payment to your mother, Marina C. Colon, as she required assistance in covering certain expenses. Rather than requiring another costs deposit to replace the one sent to your mother, Mr. Lino agreed to reimburse our firm for any costs,

MIAMI OFFICE: THE MINDORCA, 2030 SOUTH DOUGLAS ROAD, SUITE 214  
CORAL GABLES, FLORIDA 33134 US  
TEL. (+1) 305-639-8599 / FAX: (+1) 305-397-1384  
WEB: WWW.NEGRI-TORRES.COM / E-MAIL: MIAMI@NEGRI-TORRES.COM

which include, but are not limited to: photocopying charges, PACER charges, airfare, lodging and automobile rentals. Mr. Lino asked that we invoice him for payment of costs, but, given the current situation, we will not be doing so and will have no choice but to waive all costs incurred to date.

Unless you choose otherwise, we will remain on the FOIA case through the completion of the administrative appeal and final adjudication of the anticipated FOIA lawsuit. It is likely that this administrative appeal will be denied, as they routinely are, and that you will have to proceed with the actual lawsuit in order to fight for your right to the extensively withheld information from your file. You

Our payment of the \$25,000.00 sum to you as a partial reimbursement of the Engagement Fee would resolve any and all outstanding disputes between you and our law firm and/or me. If you are in agreement, please sign below and return to me in the enclosed self-addressed envelope.

*If you are in disagreement with this sum, I ask that you please either respond directly to me in writing. I am enclosing a pre-paid, self-addressed envelope for this purpose. You may also contact our office so that we may arrange for a call. Please note, there have been several occasions when you have called, and my staff has accepted the call, but the line falls and the call is never connected.*


Thank you and I look forward to receiving your response.

Cordial regards,

  
Kristin D. Figueroa-Contreras

I, Rogerio Chaves Scotton, am in agreement with all of the above and hereby authorize NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC, to remit the aforementioned sum of \$25,000 to my mother, MARINA C. COLON, to whom I have granted a power-of-attorney and who will receive and be able to deposit same payment on my behalf.

Dated: MAY 10 ~~2015~~ 2016

  
Rogerio C. Scotton  
D. Ray James Ct  
P.O. Box 2000  
Folkston, GA 31537

NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
MIAMI OFFICE: THE MINORCA, 2030 SOUTH DOUGLAS ROAD, SUITE 214  
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TEL. (+1) 305-639-8599 / FAX: (+1) 305-397-1384  
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 Street and Apt. No., or PO Box No. **2030 SOUTH DOUGLAS ROAD, #214**  
 City, State, ZIP+4® **CORAL GABLE, FL 33134**

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ROGERIO CHAVES SCOTTON  
 D. RAY JAMES C.F.  
 P.O. BOX 2000  
 FOLKSTON GA 31537  
 REG NO: 99370-004

TO: LAW OFFICE OF NEGRI, TORRES & CONTRERAS  
 ATTN: KRISTIN CONTRERAS  
 2030 SOUTH DOUGLAS ROAD, SUITE 214  
 CORAL GABLES FL, 33134

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5/19/2016

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May 12, 2016 , 4:34 pm	Departed USPS Facility	MIAMI, FL 33152
May 12, 2016 , 12:50 pm	Arrived at USPS Facility	MIAMI, FL 33152
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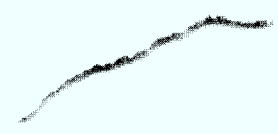
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**Message de Rogerio**

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Carlos Colon <taino1124@gmail.com>

Fri, May 20, 2016 at 6:34 PM

To: Kristy Figueroa-Contreras <Kristy@negri-torres.com>

El dia 13 de Maio você receio uma carta acignada por Rogerio para você devolver os \$25,000.00. Você vai a devolver o nao?

**EXHIBIT B**

Numerous letters sent to the Florida Bar, Contreras and even the District Court to resolved this issue of Contreras that has took retainer without contract and without perform the assistances in Scotton direct appeal as was requested from day one.



June 24, 2016

THE FLORIDA BAR  
ATTN: MAURA CANTER  
651 EAST JEFFERSON STREET  
TALLAHASSEE, FL 32300-2300

RE: KRISTIN FIGUEROA-CONTRERAS; RFA No: 16-3929

Ms. Maura Canter,

I hope you will be able to assist me with the continue issue I been have with the attorney mention above.

For you information, I'm attaching a copy of the letter I already have signed and returned to Kristin Figueroa Contreras, of the Law Firm, Negri, Torres & Figueroa Contreras in Coral Gables, Florida.

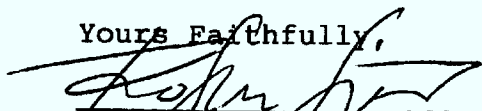
In this documents I have accepted a refund as she have proposed of \$25,000.00 of return paid fee were she was retained to do my appeal.

The letter as you can clear see, was send by certified mail and it was received by them on May 13, 2016. My family as well had attempted to contact her office by phone and email (see attached email) which no avail.

Since this date I have heard nothing from her office. Can Florida bar assist me in any way to get the refund which was been clearly promised? I look forward to hearing from you.

I will thank you in advance for your assistance  
in this important mater.

Yours Faithfully,



ROGERIO CHAVES SCOTTON  
REG NO: 99370-004  
D. RAY JAMES C.F.  
P.O. BOX 2000  
FOLKSTON GA 31537

January 4, 2016

THE FLORIDA BAR  
ATTN: MAURA CANTER, BAR COUNSEL  
651 EAST JEFFERSON STREET  
TALLAHASSEE, FL 32399-2300

RE: ROGERIO CHAVES SCOTTON v. NEGRI, TORRES & FIGUEROA-CONTRERAS

COUNSEL MAURA CANTER,

I have receive your letter date December 22, 2015 and I have to say that this is the second time you have mislead my letter or engage in cover-up the fraud of the attorney who hold an Florida Bar License and has outrageous committed a grossly fraud toward me and my family.

You also have receive the affidavit from Carlos and Marina Colon in which claim the same fraud conduct by the same Contreras.

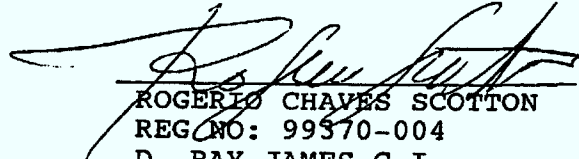
You keep missing the point here, the fact is that Contrera engage in sent me numerous letter to justify her fraud.

As even a clear evidence of the grossly fraud, one of his letter she state that will refund 25 thousand. HAVE SHE REFUND THE 25 THOUSAND DOLLARS??? No!!!

Please do not mislead my letters again, and for your information, I do not want The Florida Bar to be a intermediry rather I have requested for a investigation and justice.

I presume I will not get from your office, since your have continue to mislead my letter and protected the attorney.

At least, if you will ignore the facts presented to your office, please don't mislead my letter and evidence. Why your office would rule anything in a favor of a convicted rights? I guess would be something for the court to make a decision.



ROGERIO CHAVES SCOTTON  
REG NO: 99570-004  
D. RAY JAMES C.I.  
P.O. BOX 2000  
FOLKSTON GA 31537

December 5, 2015

THE FLORIDA BAR  
ATTN: MAURA CANTER, BAR COUNSEL  
ATTORNEY CONSUMER ASSISTANCE PROGRAM  
651 EAST JEFFERSON STREET  
TALLAHASSEE FL 32399-2300

RE: ROGERIO CHAVES SCOTTON, RFA NO: 16-3929

Dear Maura Canter,

I hope this letter find you well.

I would like to provide you with the lest certified letter I have send to the office of Kristy Figueroa Contreras on November 10, 2015.

I have requested Contreras to returning all my files and documents. But no avail.

Those documents that included my remedy files that I have submitted here in prison and to BOP in Washington in the matter of my medical issues, was taken by Contreras during the time she was here in prison.

Moreover, I have call Mr. Joao Lino who told me over the phone that has sent all emails and communication with Contreras that clearly will prove to your office that even before this money was transfer to Contreras, the only services requested was to handle my direct appeal.

My mother has also confirm that Mr. Joao Lino has order that all the communication and emails made by Contreras in the matter my appeal to be release to me to prove that Contrera's

statement and forgery documents are nothing but lies and cover-up.

Ms. Canter, I could not began to described to you the damage Contreras has cause to me and to my family. But as a lawyer you will agree with me that I should have by now my appeal resolved in the case we have pay a honestly and effective attorney to handle this appeal. Quit frankly this 18 months so far to do one direct appeal in a novel case is unprecedented.

The money she have take from us, should I have pay to a honestly attorney, I could already have prove my innocence and be home with my family.

Now, important documents may be lost or destroy due to the continue outrageous grossly behavior from this Florida license attorney (Contreras).

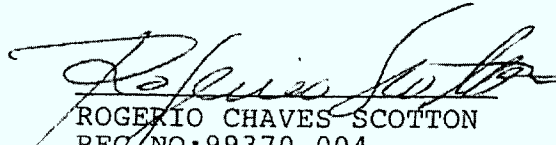
I would like to requested your assistance in obtain all my documents, including my medical record, my formal resolutions (remedy) and numerous others documents that included a records from a car accident I have been involved before my arrested that Contreras has taking from my mother.

I do not understand for the reason your office has not open a serious investigation in this serious matter of a license attorney committed fraud. May be for the reason that Contreras is a Florida license attorney and I am just another convicted criminal (what should I taking). But, the fact here is that I was defraud by a license attorney and forever prejudice in a grossly way by Contreras and I have provided your office with couple evidence. And so far absolute nothing has been done in the name of justice or anything to protect me and my family toward the fraud and this disgraceful behavior by Contreras.

So if you are able to help me in anyway or in recover  
al my files from Contreras, please let me know.

In the matter of the money, I would fight that in  
the court and hope God would do justice for me.

Have a very happy holidays,



ROGELIO CHAVES-SCOTTON  
REG NO:99370-004  
P.O. BOX 2000  
D. RAY JAMES C.I.  
FOLKSTON GA 31537

ATTACHED LETTER SENT TO Contreras.

NOVEMBER 6, 2015

NEGRI, TORRES & FIGUEROA CONTRERAS  
ATTORNEY KRISTY FIGUEROA CONTRERAS  
2030 SOUTH DOUGLAS RD SUITE 214  
MIAMI FL 33124

ATTORNEY CONTRERAS,

For the past month or two I have submitted couple letters to your office, in which you have not respond. (see attached letter).

The only purpose of this letter is to inform you again that you must return all my documents, including those motions, copy of my brief, all my remedy I have sent to Washington that you have taking from me here in prison during your visitation.

Since it is clear to see that you have never sent any notice of appearance to the court to inform that you and your office has been retained \$62,000.00 from the \$120,000.00 requested in order to appeal my criminal case, you have to return all legal document including those take from my mother in the matter of my car accident, my INS file, my remedy's files, my motions, my direct appeal brief and others; that along with the money as you have not perform any work toward my criminal appeal that you only have been requested to do so.

I have to say that I am not surprise to see how far you will take this matter and how grossly and disgreceful you are. I am not surprise that you forgery a retainer agreement and fabricate a false statement with your employee Emilio D'Arce



in order to cover-up your grossly and disgreceful outrageous inappropriate misconduct.

Have yourself some dignity, if you know what "dignity means. This cover-up will not change the facts that my friend, family and I have trust you and up-front give you \$62,000.00 to handle my direct criminal appeal case, that you should have sent months ago a motion to the district court or appeal court to inform that you have been hire to represent me in the direct appeal and to withdraw Richard Klugh. For whatever you have take the decision no tdo appeal my criminal case, Nevertheless you should return the documents with the money.

Do you understand that this money was not free and I will have to pay one day to Mr.Lino? Do you understand? Have you learning how to defraud people in distress in law school?

You cannot have any explanation to the Florida bar for what you have done. I hope you will have a better explanation to give to God one day for the damage have done to us. But, until them, I want all my documents back A.S.A.P.

You need to stop to lie and be dishonesty the Florida Bar Lino and my family; that along to yourself. This is disgreceful.

My life has been destroy over false allegation after a blow the whistle in the Federal Express drug scheme, and the onlything important thing for you is money? And now you began into engage in more untrude of facts and to creating a misleading impression to protect you deceive conduct? Have your self some dignity Contrera, you know that this forgery retainer agreement has never sent to me or anyone in the matter of my criminal case. That the statement from Emilio D'Arce was untrude and cover-up

of your deceive dishonesty grossly conduct.

Do you understand how grossly and disgraceful it is for a license attorney to forgery a document like you have done in this matter, and worse to sent even to the Florida Bar? Do you know? Do you know that your misconduct has increase the illegally incarceration I have suffer over 46 months? Do you know? I don't believe so!

Contreras, you don't have any rights to even suggesting to the Florida bar that you have been offended. Your grossly disgraceful behavior cannot justify anything. YOU HAVE COMMITTED FRAUD AS A LICENSE ATTORNEY, DO YOU UNDERSTAND THAT?

Presume you I.Q. is 120, you want make the Florida Bar to believe that we have give you \$62,000.00 to handle a \$2255 when I still in my direct appeal?

What you have done is a dishonesty conduct in tell everyone that you have been work with Richard Klugh in my criminal appeal, and now that everyone knows the true that you have deceive me and my family you engage in such disgraceful act into forgery documents, knowing that you have been hired one day one to handle only my direct appeal. No contract was given all this time or even a retainer. After I filed a complain to the Florida bar your better choice of cover-up was even worse. Have you see the letter that attorney Richard Klugh has sent to me after I was force to file a motion to the district court to withdraw him based in your false allegation in being working with him in my direct appeal? Do you understand that your deceive act has implicated other?

I urge you to do the right thing rather them continue to forgery documents and provide false statement to cover-up.

I will not allowing this outrageous behavior continue. You cannot continue to cover-up this matter anymore. NO ONE HAS REQUESTED YOU TO DO ANYTHING FOR ME RATHER THEM MY DIRECT CRIMINAL APPEAL. (filed a direct criminal brief). My friend and even my family could not be ask you to do a § 2255 since they do not understand what it the means of that. You have began to cover-up this fraud conduct since I have requested the money back. No one ask you to come to prison or to do anything that was not a direct criminal appeal. YOU HAVE PLAY ME AND MY FAMILY. YOU TOOK THOSE DOCUMENTS TO JUSTIFY THAT YOU HAVE BEEN WORKING IN THIS CASE. YOU ARE A MONSTER. You are disgraceful to the Florida bar association.

I have submitted today a forma complain with the emails, phone records, letters and others evidences to the FBI in Washington since I am in prison and they could proper investigate this matter and bring you to justice.

My family extent record that including phone recording with you employee Emilio D'arce and numerous others witnesses will clearly prove what this money was given to you for only represente me on my direct appeal, and that has been nine (9) months that we have requested you to stop play games and return the money. Even Mr. Lino and Ovidio Kalips has request by email and phone for you to return the money. Ovidio even mention not believe that we never going to see this money again. So far his presumption has conform. But does not mean you will get to walk without justice be done.

Further, you outrageous grossly conduct will tarnish the reputation of your partners in the firm.

I want my documents and you must return now; That along with the money you have dishonestly take from us.

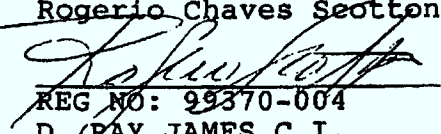
I have 5 witnesses that was present during two of your phone calls. I requested such so they can see and be witness of what you have done and how many time I have ask you and Emilio D' Arce for the money back because you are not my attorney.

I have give you sufficient time and opportunity to resolve this situation. You may be able to forgery documents and cover-up this fraud, the Florida Bar may protect you and allowed you walk way from this disgraceful fraud, but you cannot keep the truth from GOD. Do you know who GOD is?

The truth will be review in one way or in another.

I am here by request that you stop violated my substantial rights including the sixth amendment and give me back my documents.

Rogério Chaves Seotton

  
REG NO: 95370-004

D. RAY JAMES C.I.

P.O. BOX 2000

FOLKSTON GA 31537

CC: CARLOS & MARINA COLON  
FLORIDA BAR  
RICHARD KLUGH  
FBI WASHINGTON  
TINA CONTE  
JOAO LINO & OVIDIO KALIPS  
CONSULADO DO BRASIL

**PROOF OF SERVICE**


I Rogerio Chaves Scotton do certify that this November 10, 2015, I have served the attached letters and documents to the office of Negri, Torres and Figueroa Contreras (attorney Kristy Contreras) in the above proceedings and matter. I have served such letter and documents via United States Postal Services (USPS) certify first-class mail.



ROGERIO CHAVES SCOTTON  
REG NO: 99370-004  
D. RAY JAMES C.I.  
P.O. BOX 2000  
FOLKSTON GA 31537

**DECLARATION OF STATEMENTS AND DOCUMENTS**

I Rogerio Chaves Scotton hereby under the perjury to confirm that those letters and documents sent to the office of NEGRI, TORRES AND FIGUEROA CONTRERAS (attorney Kristy Figueroa Contreras), was not forgery or change. Those documents was sent and was delivery to the office of the attorney mention above.

  
\_\_\_\_\_  
ROGERIO CHAVES SCOTTON  
REG NO: 99370-004  
D. RAY JAMES C.I.  
P.O. BOX 2000  
FOLKSTON GA 31537

OCTOBER 22, 2015

THE FLORIDA BAR  
ATTN: MAURA CANTER, BAR COUNSEL  
ATTORNEY CONSUMER ASSISTANCE PROGRAM  
651 EAST JEFFERSON STREET  
TALLAHASSEE FL 32399-2300

RECEIVED  
NOV 12 2015

The Florida Bar - ACAP  
Tallahassee, Florida

RE: ROGERIO CHAVES SCOTTON RFA NO: 16-3929

RESPONSE TO CONTRERAS LETTER AND  
EMPLOYEE EMILIO D'ARCE FALSE AND  
FRAUDULENT AFFIDAVIT.

Dear Ms. Canter,

I have to say that at of delighted of receiving your correspondence regarding the request for assistance (RFA). I must admit you'reputation of expedient work supersedes your reputation.

In regard to the RFA 16-3929 I must clarify the fact I never offended counselor Contreras like she mention in the corresponded herein attached. In my culture, to be call a "pistoleira" means to extort people. In fact the counselor has extorted my family and began to engage in extorting me here in prison in order to refun \$25,000.00. I should be the one offended, we have paid Contreras to handle my appeal and she has lied to everyone.

Now as for the matter in question it could be clearly demonstrated that counselor Contreras has in many occassion the opportunity to present me with a retainer agreement in which

she failure to do so. The counselor could simply email or send to my family, or when she was here in prison on two occasion after my family and I has call her office and requested that she return the money since she will not represent me in my direct appeal. Why she has not brought me the retainer agreement to sign? Why I would refuse to sign any retainer especially when the money has been given to her? You would think since I have already given her \$62,000.00 to provide me with legal assistance in my direct criminal appeal in the Eleventh Circuit, Why would I refuse to sign?

And now in order to cover-up such outrageous misconduct by a license attorney, she engaged in more violation and fraud to forgery a retainer agreement that does not even have the day that was signed, does not have proof of service or any certification that was mailed to me, or when it was mailed. But her assistance Emilio D'Arce was told by Contreras to forgery a false affidavit and claim that he has attempted to in 3 occasion send such forgery retainer to me.

My family testimony and affidavit, in which has been sent to your office with the phone records and email attached will clearly shown how many times they have call Contreras office, even to talk to emilio D'Arce to let him know that she needs give the money back since she has not submitted the document to the court of appeal, to inform the court that she has been retained to handle my criminal appeal.

Also the phone system here in prison in which I have already have requested the transcripts will prove that Emilio D'Arce has forgery a affidavit and fraudulently made statements that he know are not true. For whatever may be the



reason , does not justify him given false statement in order to cover-up Contreras fraud and inappropriate behavior as a license attorney.

In numerous times I have personally talk to Emilio over the prison phone and advice him that Contreras must give my family the money back, that she has never submitted to the appeal court a motion to advice the court she has been retained to handle my criminal appeal, that she has never sent me the retainer agreement or even a invoice to justify what she has done with the \$62,000.00 that she took to handle the criminal direct appeal. But the phone transcripts review that both Contreras and her employee Emilio D'Arce have lie to you, to your office and worse, violated my due process and the code of ethics. Further, Emilio D'Arce affidavit, he mention that the attorney has sent this retainer in 3 occasion. But they cannot offer any authentication of proff of service, date of delivery to you, to your office and to the federal court. When it was sent, and why I have not signed 3 times such document since I have already given \$62,000.00 more then 10 months ago. The attached and forgery retainer agreement does not have any day, does not have any information or day how and when she receive the money, does not have the day that Contreras signed it or a proof of service. Why she does not offer to your office a copy of the money being transfered to her from the money trnansfer place in Lisboa, Portugal??? Why she has not provide in such forgery agreement the day the money was receive by her office and why this money as a retainer was not in the firm trust account???

Also in the forgery and fabricated contract in which is used to cover-up Contreras fraud, was mentioned that we retained her office at \$60,000.00 (rather than the \$62,000.00) for her to handle a I247 and §2255 application. This you will agree with me that is false statement, outrageous lie and intent to cover-up such fraud and justify such disgraceful behavior as my direct appeal still pending, and was not a reason to give any attorney such amount of money to handle a § 2255 when I have been on the direct appeal since May of 2014.

Evidence, affidavit, testimony from family, friends and even the staff of GEO Group, documents, phone transcripts, emails and other phone records that I will submit to the court, will prove such fraud, misconduct and disgusting outrageous conduct by a Florida License attorney. This evidence and others will not only show how inappropriate Contreras behavior was but the way she has taken advantage of my ill old parents; that along prejudice me toward my appeal.

Moreover, I have attached the letter that was sent by the attorney Richard Klugh, who was appointed to handle my appeal. You and your office again can see clearly in this letter that attorney Klugh has never work in this case with Contreras, or any assistance made by Contreras toward my appeal. All this despite what Contreras has told my family, friends and myself, that she was working with the attorney Klugh on the appeal. This is true because the only reason my family has agree to retain Contreras was due to the conflict with the court appointed that refuse to including all the issues on the appeal brief. To be even more clear during her visitation she had promised

to correct the brief I have drafted and sent to the appeal court.

I have also four (4) staff here in prison that has complete knowledge of Contrera's fraud and lies. Such staff have told me that is they are required to testify or given any statement to your office or any court in this matter they are in condition to provide you and your office evidences, emails and statements as they have been in the same room office with me when Contreras has call here at least 3 times and I have told her over the same phone to send the money back to my family, or file the motion to the court so she can represent me proper, the retainer and invoice of what she has done with the money.

It nothing she Contreras cant say that could explain why she would take money with promises to provide a service that she has never done. As another prove of her game and manipulation during all this time of her B.S., she ha sent me a G28 form from immigration to sing and to sent back to her (in order to cover-up her fraud), despite that she was retained to appeal the criminal case and was order to filed a notice of appear to the court of appeal. So I have sign the G28 form, why should I refuse to sign the retainer agreement? This is a clear prove that she has never send me any agreement, rather she attempte to make me to sign a letter and refund me only \$25,000.00.

In one occasion she even told my family that we could not take the court-appointed off the case because if the court find out that we have retainer her, I could be charge in lie to the court. I have told my mother that if was the true, why she them don't refund the money? Nevertheless, she cover this other lies by tell my family that she will be working with the court-appointed attorney in the

the criminal appeal and if was necessary she will be with him on the oral argument. As I have mention before your office should be investigate and contact the prison staff because they will be able to confirm everything I have said to you because during Contreras phone call I requested that the phone could be on the speak so everyone in the room could be witnesses of the way I have been defraud by a Florida license attorney.

You will be able to call direct Gray Franklin at (912) 496-6242 or email him at, gfranklin@geogroup.com as well ask for Ms. Reids, Ms. Kaiser, Ms. Hurst.

In the exhibit letter I have sent you before, if you look in the letter September 3, 2015 (Contreras extortion letter and cover-up the fraud) clearly you can see that by what she has put in this letter proves the retainer was forgery and it is with the only intent to cover-up what she has done. That she is working in my bond and supplement brief appeal, but under the forgery retainer Contreras has never mention anything toward my criminal appeal. Nevertheless, Contreras false alleged that we have paid her to work on a 2255 where I am still on my direct appeal.

I must ask you Ms. Canter, have you see any person that has been given a court-appoint attorney to appeal his criminal case retain at the same time another attorney to file a 2255? I have say again. I should be the one offended by such outrageous B.S., lies and fraud conduct for someone that claims to a honestly and competent attorney. You tell me Ms. Canter, in my situation if I have spend such money in a 2255 application were I am on my direct appeal?

Emilio D'arce has given a forgery and false affidavit to your office. Nothing they would say justify any service or will prove the fact that she have been pay from day one to handle my direct appeal. Later in order to cover-up such fraud she began to pretended to be working in other areas. She has not prove anything to your office with this forgery retainer that she has signed without date, without described when and how has pay her. Why have her presented the original transfer papers that show from were and when the money was given to her? I don't be surprise that they continue to forgery documents to cover-up such outrageous behavior.

Contreras did not even date her forgery agreement when she signed it. So, in order to received from her any agreement or document (in which I have requested 10 months ago) I have to file a complain with the Florida Bar Association? Why she has not attached to the agreement the prove of payment? Why them in September 3, 2015 she engage into force me to sign such letter to receive back \$25,000.00? Why Emilio D'Arce has told me over the phone that due to the Florida Bar Association policy Contreras could not give me all the \$25,000.00 up-front and need to be in small payment? The phone transcripts and prison staff will clearly prove that Contreras and her employee engage in more disgusting and outrageous fraud and are in desperation mode to cover-up such fraud. They should be criminal charge.

If the firm was hired in a engagement fee, Why has she now given a retainer after more them 10 months? Why she mention her hours rate in the September letter?

As I have say before and I will say again, your

office must open a serious investigation in this matter and call my family, friends and contact the prison staff for a interview and collect all records, because you will see that it does not matter what Contreras says or presented to your office or to a federal judge at this point, nothing will justify the fact that on day one, when my friends and family contacted her it was in order to appeal my criminal case (1260049) that is pending on the Eleventh Circuit, the rest of her lies and ~~they~~ is all to avoid been prosecuted for such fraud, misconduct and false representation.

Mr. Canter, this has been very hard on me and on my family. I am not even talking in reference to my federal criminal case. I am talking in reference to who my family put their trust, they believed in some one that has promise them a effective way to defend me and help me prove my innocence. And what has she done? In a outrageous and disgusting way, charged \$120,000.00, yes, HUNDRED AND TWENTY THOUSAND DOLLAR in which \$62,000.00 was given to her up-front and <sup>SAC</sup> engage in lies and sent me papers here that has nothing to do with my criminal case in intent to creating some record that she was working for me to justify the money she has taking from us on to pretente to working in my direct appeal.

It is very sad to see that we have individuals that has been given license by your office, like Contreras who has disregarding the fact that we are in such pain and distress, searching for the truth, and that she has taken advance of the situation so she would make some money.

I will not stop to pursue with all my power into seek justice in this matter. Contreras knew what she was doing and how far she can push the situation. But I have filed a complain

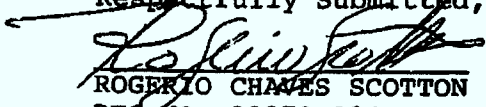
with the FBI and IRS. I will continue to sent copy of those documents to the press and submitted a law suit in this matter. The money she took I will have to pay back one day to my friend. I will expose her behavior and fraud worldwide on the internet so others could be protected from her firm. What she has done to my mother is disgusting human behavior.

I myself have put my trust in her after she was here and looked into my eye and told me that I should trust her because she knew that I as innocent and that she will appeal this case, that I have strong grounds. How can your office allowed people like that get way with this? Why she has not even sent such promise refund \$25,00.00 to my family? Because she does not have, she already spend all the money and now want us to believe in the Florida Bar Policy that she could not given the money up-front and need to be in a small payments. It is the Florida bar involved in such fraud? It is Florida Bar Association protected they license attorneys to do fraud?

Her license must be suspended during this investigation. Such a statement from her office into tell that Florida Bar Association has a refund policy is embarassed. So, if you get cut in defraud people make a small refund payment and cover-up the fraud?

I urge and demand a investigation in this matter.

Respectfully Submitted,

  
ROGERIO CHARLES SCOTTON  
REG NO: 99370-004  
D. RAY JAMES C.I.  
P.O. BOX 2000  
FOLKSTON GA 31537

PROOF OF SERVICE

I Rogerio Chaves Scotton do certify that this October 22, 2015, I have served the attached complain letter with exhibit attached on the Florida Bar Association in the above proceedings.

I have served such letter and documents via, United States Postal Service (USPS) first-class mail, through D. Ray James C.I. legal mail service.



ROGERIO CHAVES SCOTTON  
REG NO: 99370-004  
D. RAY JAMES C.I.  
P.O. BOX 2000  
FOLKSTON GA 31537



September 8, 2015

NEGRI, TORRES & FIGUEROA CONTRERAS  
KRISTY FIGUEROA CONTRERAS  
2030 SOUTH DOUGLAS ROAD SUITE 214  
MIAMI FL 33134

RE: ROGERIO CHAVES SCOTTON

Mrs. Contreras,

I am hereby advice you to returning every and all documents referent to my criminal case, immigration case or anything to do in the matter of my family, friends and myself.

I do wish not to be contact anymore by you or any one in your office, and as well do not contact my family or even my friends in the matter of my cases.

I am here still in prison thanks also to your negligence and outrageous conduct into take the money we have raise by friends with your promise to handle my criminal appeal and after receive the money began engage in tell us that you could only be able to help the court-appoint attorney that is in my case. In any way, you have done virtually nothing to help the court-appoint attorney as well me. Your act has given me more illegally incarceration. My family want to use the money to retaine an attorney to do my appeal and because your act of fraud we could not afforded one anymore.

I should be home by now, have you done what you have a license to do, instead to just take advance in two ill old people and me that is seating in prison.

I will not get into how many times I have ask you to presented a contract and a invoice to show your work toward my criminal appeal. I will not get into how many times you have promise thing and how many times you have change your statement s into how you will work in this criminal case.

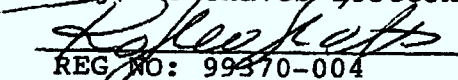
So please lets stop the B.S. and send all my documents

and files to my family at :

7797 GOLF CIRCLE DRIVE # 204 MARGATE FL 33063

Since you have never represented me in anything  
or even help the attorney Richard Klugh as you told everyone,  
it is not need to keep my documents.

Rogerio Chaves Scotton

  
REG NO: 99370-004

D, RAY JAMES C.I.

P.O. BOX 2000

FOLKSTON GA 31537

RICHARD KLUGH, P.A.  
INGLON BUILDING  
25 S.E. 2ND AVENUE, SUITE 1100  
MIAMI FL 33131

SEPTEMBER 7, 2015

RE: ROGERIO CHAVES SCOTTON

CASE NO. 14-2228-AA

v.

UNITED STATES OF AMERICA

MR. KLUGH,

THE PURPOSE OF THIS LETTER IS FOR THE REASON I HAVE NOT RECEIVE A COPY OF THE FINAL COPY OF YOUR DRAFT REPLY BRIEF OF THE APPELLANT.

AS PER OUR CONVERSATION OVER THE PHONE AROUND AUGUST 2015 AND YOUR LEAST LETTER, AS YOUR PROMISE TO KEEP INFORM AND SEND ME ANY DOCUMENT FILED IN THIS APPEAL. WELL I HAVE NOT RECEIVED ANY INFORMATION IN SUCH DOCUMENT RESPONSE TO BE FILED ON IN WHICH STAGE THAT APPEAL IS.

FURTHERMORE, I NEED TO ASK YOU TWO VERY IMPORTANT QUESTIONS, IN WHICH.

1. HAVE YOU FILE MY MOTION TO RELEASE PENDING APPEAL THAT IS ON THE DOCKET OF DISTRICT COURT AS WELL WITH THE APPEAL COURT?

2. ARE YOU INVOLVED WITH MRS. CONTRERAS IN DEFROND MY FAMILY AND FRIENDS FOR MONEY?

THE SECOND QUESTION IT IS FOR THE FACT THAT MRS. CONTRERAS AFTER TAKING HALF OF THE MONEY REQUESTED TO FILED MY APPEAL, HAS INFORMED MY FAMILY, FRIENDS AND MYSELF

THAT SHE WAS WORKING WITH YOU IN MY CRIMINAL APPEAL (14-2228-AA/1260049).

I HAVE ADVISED MY OLD AND ILL FAMILY THAT THIS COULD NEVER BE ALLOWED AND THAT WAS IMPOSSIBLE DUE THAT, THE COURT ONLY APPOINTED YOU TO HANDLE THIS APPEAL BECAUSE I COULD NOT AFFORD TO RETAIN MY ATTORNEY. IN THE EVENT SUCH COULD CHANGE THE NEW ATTORNEY RETAINED SHOULD INFORM THE COURT WITH A MOTION TO WITHDRAW THE COURT-APPOINTED AND SUCH COURT ~~ORDER~~ WOULD ORDER TO DISMISS THE COURT-APPOINT.

I HAVE SUBMITTED TO THE FLORIDA BAR ASSOCIATION AN FORM COMPLAIN AND I HAVE ADVISED THEM THAT I WILL PROCEED WITH A LAW-SUIT OVER THIS GROSSLY AND OUTRAGEOUS COMMITTED BY ATTORNEY CONTRERAS AGAINST ME AND ILL OLD CITIZEN OF THIS COUNTRY IN DISTRESS.

MRS. CONTRERAS HAS MADE SEVERAL STATEMENT OVER EMAILS, PHONE AND IN PERSON THAT SHE WAS WORKING WITH YOU IN THIS APPEAL. MY FAMILY AND FRIENDS WILL ALSO TESTIFY THE SAME AS THEY HAVE SUBMITTED A AFFIDAVIT IN THIS MATTER.

I MUST GET THE CLARIFICATION AND THE REASON ON YOUR SIDE BEFORE I HAVE TO FILE A MOTION TO ALL 3 COURTS OF SUCH FRAUD BETWEEN THE COURT-APPOINT ATTORNEY AND MRS. CONTRERAS, FOLLOWED BY ANOTHER COMPLAIN TO THE FLORIDA BAR ASSOCIATION, D.O.J. AND A LAW-SUIT.

YOU MUST PROVIDE ME YOUR ARGUMENT OR EXPLAIN WHY MRS. CONTRERAS WOULD TAKE OVER 62 THOUSAND FROM ME AND LATER ADVISE THAT WAS IMPOSSIBLE TO TALK YOU OFF THE CASE AND THAT SHE WILL WORK WITH

YOU, IN THIS CASE AND IN ANY IMMIGRATION  
ISSUE

MRS. CONTRERAS EVEN MENTION THAT IF  
THE APPEALS COURT REQUESTED AN ORAL  
ARGUMENT, THAT SHOULD BE WITH YOU FOR  
SUCH ARGUMENT.

HAVE YOU TAKING ANY PART OF THIS  
MONEY? ARE YOU INVOLVED WITH MRS. CONTRERAS  
IN THIS ACT OF FRAUD?

HAVE YOU WITH MRS. CONTRERAS ENGAGE  
IN DEFRAUD ILL OLD COUPLE IN DISTRESS?

THIS IS OUTRAGEOUS ACT AND GROSSLY  
BEHAVIOR OF ATTORNEYS.

I WILL NOT ALLOWED THIS TO CONTINUE  
AS I WILL FILED COMPLAIN TO FLORIDA BAY  
COURTS AND PROCEED WITH MAJOR LAWSUIT  
AND REQUEST THOSE INVOLVED TO BE CRIMINAL  
CHARGE WITH FRAUD.

I KNOW WE HAVE OUR PROBLEM AND  
CONFLICT TOWARD THE ISSUES ON MY APPEAL  
AND THE DEPRIVATION OF MY RIGHTS TO  
BE RELEASED, BUT DEFRAUD MY FAMILY IN  
MONEY THEY COULD AFFORD TO PAY BACK MY  
FRIEND IS GROSSLY AND OUTRAGEOUS ACT OF  
FRAUD. THOSE INVOLVED MUST BE CRIMINAL  
CHARGE WITH FRAUD AND HAVE THEIR LICENSE  
REVOKED.

IRONIC, I WAS CHARGED TO COMMITTED FRAUD.  
HENCE, IN THIS CASE THE BONDSMAN HAS RAPPED  
MY FAMILY OVER 16 THOUSAND DOLLARS AND NOW  
THE ATTORNEYS OVER 62 THOUSAND.

THAT ~~ALONG~~ <sup>ALONG</sup> OF ILLEGALLY INCARCERATION  
OF AN INNOCENT MAN OVER 42 MONTHS.

THE JUSTICE SYSTEM OF UNITED STATES OF  
AMERICA IS HANDLE BY AN HYPOCRITIC AND  
CORRUPT INDIVIDUALS NO ONE COULD RECEIVE  
ANY JUSTICE IN THIS COUNTRY!!

I AM HEREBY REQUESTED THAT YOU  
CALL ME A.S.P. OR RESPOND THIS LETTER TO  
LET ME KNOW YOUR INVOLVEMENT IN THIS CASE  
WITH MR. CONTRERAS THAT HAS DEPRIVED MY  
PEOPLE.

I ASSUME THAT SUCH STATEMENT FROM  
MR. CONTRERAS WAS TO COVER UP SUCH GROSS  
CONDUCT IN DEPRIVING ME IN THIS IMPORTANT  
MATTER, MY FREEDOM.

PLEASE YOU MUST RESPOND SUCH  
ACCEPTANCE A.S.P. AS I WILL FILE  
COMPLAIN TO COURT AND A LAWSUIT IN  
THIS MATTER.

*[Signature]*  
ROGERIO CHAVEZ SESTON  
ADDRESS: 9837  
P. BOX 2000  
FOLKS TOWN GA 31537.

CC: CARLOS AND MARINA CADON

CC: JOAO LINO

ATTACH TO THE FLORIDA BAR ASSOCIATION COMPLAINT  
AGAINST MR. CONTRERAS.

June 1, 2015

KRISTY FIGUEROA CONTRERAS ESQ.  
2030 SOUTH DOUGLAS ROAD SUITE 214  
MIAMI FL, 33134.

RE: UNITED STATES v. ROGERIO CHAVES SCOTTON CASE NO: 1260049  
ROGERIO CHAVES SCOTTON v. UNITED STATES CASE NO: 14-12228-A

Ms. Contreras,

The purpose of this letter is to express how much I am very unhappy with you and the way you have handle the situation in the matte of my criminal appeal.

I have received all the emails that was change between you and my family and frineds in Angola.

Furthermore, has been more than a months since you have see me here at prison and all the matters you have told me in reference of my brief, Immigration detainer or anything in the interest of my liberty has being done.

I have trust you and have expect high integrity from you as I have expect from any attorney. I do understand that I am not your only client, but I have call your office several times and left messages with Emilio (your Assistance), I have call your cellular, and you know how limited I am from prison to do anything.

I have request several times now from you and your office to have my contract send to me and to give me a invoice of the money my friend Jao Lino has send from Portugual for me in order to defend myself from this outrageous and corrupt system. I also need to know how much money is left under the your office account that is my.

I have not told you before, but I will tell you know, even I have ask you long time ago for your office to send me the contract you never have send. I was surprise that you took money from Joao Lino, my friend and Angola without sign and retainer contract with me. You know that was not rights and was illegal from your part to do so. Moreover, you told Mr. Lino and my family that you will handle my criminal appeal

in which you have never send any motion to District court or to the appeal court to inform of change of attorney.

Them later after you have received the money you have change the history. Please don't let you to believe that I do not know what you have done and what you are doing. I am a professional business race car driver and with good knowledge the way thing are.

I will not get in the details in this contract finance matter, and I do not taking will change anything at this point. But I will not continue to play this game anymore since is my life and my liberty is on the line. If I have to go to hell under those circumstances, that is ok, but I am planed to bring everyone that is involved with me.

Two weeks or more, you have told my family in one of those emails that I should received the brief document on Saturday and Emilio send other email to let my family know that a copy will be send to one week after o email. Still today June 1, 2015 more than one month after our conversation here at prison and you have not be able to delivery what you told me.

In the matter of the brief, I have to let know that because you have not done or even send to me the supplement brief, I have send to the appeal court what I have done here. So at last all my issues is on the docket.

This hole crime system is one big corruption and everyone involved is part of such corruption.

I will also filling a motion to the Immigration court at Miami and at Stewart Georgia in the matter of the illegally detaienr they have on me with the exhibits of all the forgery papers from the government in reference of my immigration.

You have now responded to me were is the other envelope you told me you have send to me together with the one I received with the FEDEX indictment. You have told me in you green pad note "because I cannot mail a box, am putting documents inseparate envelopes 1 of 2. I only received one envelope with the FEDEX indictment and some news about my case. So please let me knoww where is the envelope 2 and what was inside. If was lost I presume you have a copy and I will need.



I have also filling a motion to the district court to compel the cd audio transcripts in which my currently attorney has lied to me that federal court does not have such material. Still today no response. How much corruption in one single case we need to see? Has been more than a year that I have filling notice of appeal and still today not be able to proceeded with my appeal. I need to change the venue and this will be the next motion to be filed.

I would like for you to sed me A.S.A.P. a invoice with the break-down in how much you have spend of my money and what is left. I need to know by next Monday June, 8 2015, how much of the money Lino has sent to you in order for you to appeal my criminal case and the immigration as well.

I need to know everything you have done at this point since the money was transfer to you and both cases.

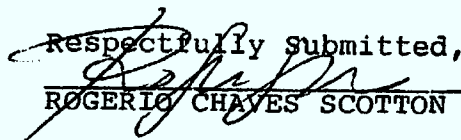
I would please requested that you returning ALL files and documents referent to any of my cases [criminal or immigration] back to my family or let they know where and when to pick-up.

I urge to have the invoice to show what you have done in this case since we never sign any contract before you have take the money from Lino and now that you told him and my family that you will not represent me on the criminal case despite the fact that the money send to you was for the criminal case.

I will urge you all so that I have not waive my rights and the confidentiality and privacy as a client.

I have call your office this morning 3 times around 11:00 am and no one has responded.

Please I requested that you take this letter serious and do the right thing.

Respectfully Submitted,  
  
ROGERIO CHAVES SCOTTON

CC: MARINA AND CARLOS COLON  
CC: JOAO LINO  
CC: OVIDIO KALIPS

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES,

CASE NO: CR-1260049-MORENO  
CV-14-2228-AA  
S.CT.-15-5426

v.

ROGERIO CHAVES SCOTTON,  
\_\_\_\_\_ /

MOTION TO WITHDRAW COURT-APPOINTED  
RICHARD KLUGH FOR OUTRAGEOUS  
MISCONDUCT AND FRAUD.

Come now movant Rogerio Chaves Scotton by and through Pro Se, moves this court to requested court-appoint attorney Richard Klugh to be withdraw for the reason of outrageous misconduct and fraud. In support of his motion, movant states that:

1. Court-appointed attorney Richard Klugh was appointed to handle movant appeal in front the Appeal Court For The Eleventh Circuit on May of 2014.

2. Mr. Joao Lino and family fo Movant Scotton began to raise money around Jun 2014 in order to retained an effective attorney.

3. Court-appointed attorney Klugh has deprive Scotton his rights to filing motion to release pending appeal and refuse to filed all the violation and issues that contents in this criminal novel.

4. Court-appointed attorney Klugh has continue the appeal 6 times without given Scotton any notice or even

a reasonable reason for such continuance and by them increase Scotton illegal incarceration.

5. Around November 2014, Attorney Kristy Figueroa-Contreras was retained by Scotton's friends in the total amount of \$62,000.00 to handle Scotton's appeal and subsequently to withdraw court-appointed attorney Richard Klugh by filing a motion to the court for attorney appear for a client.

6. Months later after Contreras received the retained money (\$62,000.00), attorney Contreras has failure to inform the court as a requirement mandatory by a license attorney and began to inform friends and Scotton's family that she could not withdraw court-appointed attorney Klugh from the case and will work with him in the appeal.

7. Joao Lino, scotton's family and himself has requested that attorney Contreras to return the money since she was no able to provide the legal service she has hired for and to inform the court that she has been retained for such criminal appeal.

8. Contreras began to states that she was helping court-appoint attorney Klugh and also was working on any immigration issues Scotton may have, despite that she was hired to provide Scotton with legal service in his direct criminal appeal and refuse to return the money.

9. Around December 2014, Scotton has draft his brief in which all the issues and violation was draft during his pretrial, trial and sentence that court-appoint attorney Klugh refuse to submitted. Both attorneys Klugh and Contreras has received a copy. Still both has refuse to submitted.

10. Around January, 2015 Contreras has advice friend and family of Scotton that she would be filing the notice of attorney appear for a client and subsequently to filing the appeal brief to court.

11. Contreras advice movant friends and family that she when to the court-appoint office and that their are working on the brief together despite numerous times the friends and family of Scotton has requested the money back.

12. Court-appoint attorney has violated scotton confidentiality and his private by sent to attorney Contreras and talk to her about Scotton criminal appeal without any authorization.

13. Movant Scotton submitted a motion to the Chief Justice at the Court of Appeals For The Eleventh Circuit to discharge court-appoint attorney for a good cause and the court denied.

14. Subsequently to the denial by the appeal court in discharge court-appointed, Attorney Klugh has sent a letter to movant Scotton and states that he would sent any and all documents to movant Scotton before their are filed do Scotton could review. But has already and again requested under two different motion to requested extention for reply brief without given any notice to Scotton. [see KLugh Leter].

15. Contreras began to cover-up the fraud scheme by sent to movant a extortion letter and offer to refund only \$25,000.00 after Scotton has filed to The Florida Bar a complaint. [see complaint and evidences].

16. Scotton has submitted a letter to court-appoint attorney Klugh and advice attorney assistance over the phone the topic of the letter and to respond what was his involvement with attorney Contreras in defraud my friends, my family and movant itself.

In the September letter and phone call, movant advice court-appoint attorney Klugh and his assistance that he must proper inform movant if he has any part on attorney Contreras fraud and now extortion scheme. Court-appoint attorney Klugh has not respond Scotton's letter or phone call in this matter. [see attached letter sent to court-appointed attorney Klugh.

ARGUMENT

Attorney Richard Klugh was appoint by the Southern district Court Judge Rosenbaum and agreed to competently provide legal service as set for in Scotton direct appeal.

Around Jun, 2015 attorney Klugh has refuse to release to Scotton all transcripts from his criminal trial for proper analysis and review, and also has refuse to filing all the violation, misconduct and abuse it discretion in this novel case.

An indigent defendant who cannot afford to retain an attorney has absolute rights to have counsel appointed by the court. See GIDEON v. WAINWRIGHT, 372 U.S. 335, 342 (1963).

An indigent defendant must demonstrate that his or her lack of financial resources in order to be eligible for appointed-counsel. UNITED STATES v. PARKER, 439 F.3d 81, 97-98 (2nd cir. 2006). Scotton has satisfy the requirement.

Further, as a indigent defendant Scotton has a right to appointed-counsel in his appeal if the appeal is granted as of right. UNITED STATES v. GILIS, 773 F.2d 549, 559 (4th cir. 1985), UNITED STATES v. DANIELSON, 325 F.3d 1054, 1077 (9th cir. 2003). Although a defendant has the right to retain an attorney of his choice, UNITED STATES v. GONZALEZ-LOPEZ, 548 U.S. 140, 147-48 (2006).

In any case if a defendant find himself capable to retain a attorney, such retained attorney has the obligation and must inform the court that he or she has being retained by the defendant by filing the notice of attorney appear for a client, or the court-appointed attorney has the obligation to inform the court that the defendant has retained a attorney.

Subsequently to the court-appointed attorney Klugh behavior and personal motivation in this case, he has failure to requested all trial transcript, he has failure to corrected the trial transcripts, he has refuse to submitted in the appeal brief all violations, misconduct and abuse it of discretion in this novel case.

Scotton fried Joao Lino has with other raise money so Scotton could retain a effective attorney that could

provide effective and honestly legal service. Consequently Attorney Kristy Figueroa-Contreras was retained and give the sum amount of \$62,000.00 to handle Scotton direct appeal, and to withdraw the Court-appointed attorney Klugh.

Court appointed attorney Klugh was inform that Contrera was retained and he has clear knowledge that he should discharge as attorney Contreras was hired to appeal Scotton case.

Kristy Figueroa-Contrera is an license approved attorney to practice law in the states of Florida, and has agreed to competently provide legal service to Scotton in his direct appeal as charge the amount of \$120,000.00 to his friend Joao Lino and has accept a down payment of \$62,000.00.

It is clearly that by taking the \$62,000.00 attorney Contreras undertook representation of Scotton criminal direct appeal as she was hired for. Hence, attorney Contreras has never filed any motion to the District Court or even the appeal court to inform that she has been hired to handle Scotton direct appeal.

Months has going by and attorney Contreras was advice to (1) filing to the court the required and proper document to inform the court that she has been hired to appeal Scotton case, (2) to returning the \$62,000.00 since she has not filing the proper motion to advice the court that she has been retained \$62,000.00 to appeal Scotton case and to discharge Klug.

Next, despite the request from friends and family to returning the money, attorney Contreras began into tell the fried and family of Scotton that she was working together witht the court-appoint attorney Klugh in Scotton direct appeal and in his immigration issues.

Scotton has requested to the courts to withdraw court-appointed attorney in numerous occasion over serious misconduct, ineffective given Scotton legal assistance, and fraud, in which the courts denied.

subsequently Scotton appeal to the Supreme Court [case no S. Ct. 15-5426].

According to such conflict between scotton and court-appointed attorney, Attorney KLugh has submitted to Scotton

a letter to inform that if Scotton wish to replace him with Kristy Figueroa Contreras with a Pro Se brief or a supplement was movant rights to do so, and has inform that attorney Contreras was copy in the same letter. [please see Klugh letter copy to Contreras].

In this letter Court-appointed Klugh has acknowledge the fact that Contrera was retained by Scotton family and friends and in the same time Klugh has again violated Scotton's due process rights by disclosure his case and his confidentiality to Contreras without authorization.

Further, court-appointed attorney Klugh failure to inform the court that Scotton friends and family has retained another attorney, and failure to withdraw himself from the case. Court-appointed attorney Klugh has conspired with attorney Contrera in violated Scotton due process and court rules, knowing that he is office of the court and that he has the obligation to to inform the court Contreras was retained ro handle Scotton's appeal.

Around August 7, 2015 Scotton has sent to the court-appointed attorney Klugh a letter after a phone call convertaion in which Scotton requested that the court-appointed attorney to filing the motion to release pending appeal that is seating on the docket of the district court and the appeal court. Court-appointed attorney has promises to looking into the motion to in order to filing. (see attched letter from Scotton August 7, 2015). Instead of to filed such motion, court-appointed Klugh has requested to the appeal court another extention, by them increase Scotton' illegal incarceration.

On September 7, 2015, Scotton submitted another letter to the office of the court-appoint attorney Klugh following by a phone call in which Scotton has left a message with Klugh assistance in the topic of the letter. (see September letter sent by Scotton). In this letter send in September to Klugh office, Scotton has requested that the court-appoint need to clarify his involvement with attorney Contreras in defraud my family and me over \$62,000.00 and why he has not inform the court that Contreras was retained.

Further, court-appointed attorney Klugh has clear shown that he does have interest and personal motivation to stay in this case since he has not comply with the laws and courts rules. Klugh has not only violated Scotton rights, but the courts itself rules. Klugh has continue Scotton's appeals 6 times since May 2014, without given any notice to Scotton or any reasonable reason for such continue, by them increase Scotton's outrageous incarceration. It is clear to see in this novel case that court-apointed Klugh does not have Scotton's best interest in this case as he refuse to filing Scotton's motion to release pending appeal or include in the appeal all the violation and issues, and violate court rules when he failure to proper inform the court that Contreras has been retained. Such grossly and no appropriate behavior has violated Scotton's due process.

Such behavior it is grossly and not appropriate by a license office of the court, and has outrageous violated Scotton's due process and clear shown that the allegation submitted before in this case by Scotton that the court-appointed attorney Klugh was with intention appointed to this criminal appeal By Rosenbaum with intent to cover-up the numerous misconduct, bias toward Scotton for exercise his rights, and several and outrageous abuse it descretion, has been clear proof as court-appointed Klugh continue deprive Scotton his rights to proper appeal his case and continue to increase Scotton's incarceration by outrageos extentions resquested numerous times by him in this appeal. This grossly and not appropriated behavior is unprecedente.

This is nothing to do with justice, it is everything with politics and money. I must ask, have Federal Express pay the Court-appointed Klugh to sabotage my direct appeal so I don't continue to blow the whistle in FedEx illegal drug Scheme?

Court-appointed attorney Klugh has clearly knowlegde that attorney Kristy Figueroa Contreras was retained to handle Scotton's appeal and he failure to withdraw himself form this case or even inform the court. This case should be dismissed.

This court should granted a evidentiary hearing in which the Court-appointed, the attorney Contreras, Scotton's friends and family, and others witnesses could given testimony



in camera to resolve and get the facts in those attorneys continue their outrageous behavior and into sodomize Scotton over money and more important, his freedom.

Scotton already has been defraud by the bailsbond David Rodrigues that was introduce by the court-appointed Adelstin over \$16,000.00 and now, court-appointed Klugh conspired with Contreras and undertook \$62,000.00 to handle Scotton appeal.

Scotton has submitted to The Florida Bar an complaint in this matter and has began a law-suit against the office of Kristy Figueroa Contreras for misconduct, false representation, fraud and extortion. (see Florida Bar Complaint).

The court-appointed attorney Klugh grossly behavior should not be accept by this court as Klugh failure to advice the court that Contreras was retainer to handle scotton's appeal and conspired with Contreras outrageous fraud. For whatever reason or for whatever may been Klugh motivation into continue in this case, he has outrageous violated court rules, conspired with a inappropriate behavior from the fraud committed by attorney Contreras and has violated Scotton's substantial rights to a fair judicial appeal.

Scotton's is entitle to a relief and an evidentiary hearing.

#### CONCLUSION

Base upon the foregoing, it is respectfully requested that court-appointed attorney Klugh be discharge from this case for violated scotton rights and court rules and the alternative to a evidenatiary hearing with all parties in camera given reasonable reason for not inform the court that Contreras was retained and why Scotton continue to be sodomize by this outrageous injustice system.

Respectfully Submitted,

  
ROGERIO CHAVES SCOTTON

REG NO: 99370-004

D. RAY JAMES C.I.

P.O. BOX 2000

FOLKSTON GA 31537

PROOF OF SERVICE

I Rogerio Chaves Scotton do certify that, this September 20, 2015, I have served the attached motion to withdraw court-appointed attorney for fraud that is under Scotton constitutional rights on the Southern District Court in the above proceeding. I have served such motion via, United States Postal Services (USPS) first-class mail, through D. Ray James C.I. legal mail services.



ROGERIO CHAVES SCOTTON  
REG NO: 99370-004  
D. RAY JAMES C.I.  
P.O. BOX 2000  
FOLKSTON GA 31537



## The Florida Bar

651 East Jefferson Street  
Tallahassee, FL 32399-2300

John F. Harkness, Jr.  
Executive Director

850-561-5600  
[www.FLORIDABAR.org](http://www.FLORIDABAR.org)

April 4, 2016

Mr. Rogerio Chaves Scotton  
D. Ray James Correctional Institution  
P.O. Box 2000  
Folkston, GA 31537

Re: Kristin D Figueroa-Contreras; RFA No. 16-3929

Dear Mr. Scotton:

I regret to read that you did not receive the mail. We sent it certified mail and have the return receipt. You will have to take that up with the facility.

Sincerely,

Maura Canter, Bar Counsel  
Attorney Consumer Assistance Program  
ACAP Hotline 866-352-0707



The Florida Bar  
651 East Jefferson Street  
Tallahassee, FL 32399-2300

John F. Harkness, Jr.  
Executive Director

850-561-5600  
www.FLORIDABAR.org

December 22, 2015

Mr. Rogerio Chaves Scotton  
D. Ray James Correctional Institution  
P.O. Box 2000  
Folkston, GA 31537

Re: Kristin D Figueroa-Contreras; RFA No. 16-3929

Dear Mr. Scotton:

I am sending you a copy of a letter from the attorney which appears to satisfy your most recent request. She is obviously willing to communicate with you, therefore I would request you do not use The Florida Bar as an intermediary to contact her. Thank you.

Sincerely,

Maura Canter, Bar Counsel  
Attorney Consumer Assistance Program  
ACAP Hotline 866-352-0707

Enclosures

cc: Kristin D Figueroa-Contreras, Esq. (enclosing Mr. Scotton's recent letter)



## The Florida Bar

651 East Jefferson Street  
Tallahassee, FL 32399-2300

John F. Harkness, Jr.  
Executive Director

850-561-5600  
www.FLORIDABAR.org

November 17, 2015

Sent Via Certified US Mail – RRR 7013 2630 0002 1612 3533

Mr. Rogerio Chaves Scotton #99370-004  
D. Ray James Correctional Institution  
P.O. Box 2000  
Folkston, GA 31537

Re: Kristin D Figueroa-Contreras; RFA No. 16-3929

Dear Mr. Scotton:

I am returning the documents you submitted because they contain original signed letters from Ms. Figueroa-Contreras. Please resubmit your letter if you choose to do so without original documents. Thank you.

Sincerely,

Maura Canter, Bar Counsel  
Attorney Consumer Assistance Program  
ACAP Hotline 866-352-0707



## The Florida Bar

651 East Jefferson Street  
Tallahassee, FL 32399-2300

John F. Harkness, Jr.  
Executive Director

850/561-5600  
www.FLORIDABAR.org

September 16, 2015

Ms. Kristin D Figueroa-Contreras  
Negri, Torres & Figueroa- Contreras, PLLC  
2030 S Douglas Rd Ste 214  
Miami, FL 33134-4620

Re: Rogerio Chaves Scotton; RFA No. 16-3929

Dear Ms. Figueroa-Contreras:

The Attorney/Consumer Assistance Program (ACAP) of The Florida Bar has received a Request for Assistance from the above indicated client. The nature of the request suggests that there may have been a lack of communication with your office which, if substantiated, could constitute a violation of certain Rules Regulating The Florida Bar, and could lead to disciplinary action by the Bar.

No disciplinary file has been opened at this time, but ACAP is requesting that you contact this client by September 30, 2015, in order that this matter might be resolved without a disciplinary file being opened and investigated.

By copy of this letter to Mr. Scotton, I am advising that should I fail to hear anything further from either of you within thirty days of the date of this letter, I will assume that the matter has been resolved. Pursuant to the Bar's records retention schedule, the computer record and file will be disposed of one year from the date of closing.

Thank you in advance for your efforts in assisting an expeditious and amicable resolution of this matter.

Sincerely,

Maura Canter, Bar Counsel  
Attorney Consumer Assistance Program  
ACAP Hotline 866-352-0707

cc: Mr. Scotton



## The Florida Bar

651 East Jefferson Street  
Tallahassee, FL 32399-2300

John F. Harkness, Jr.  
Executive Director

850/561-5600  
www.FLORIDABAR.org

September 16, 2015

Ms. Kristin D Figueroa-Contreras  
Negri, Torres & Figueroa- Contreras, PLLC  
2030 S Douglas Rd Ste 214  
Miami, FL 33134-4620

Re: Rogerio Chaves Scotton; RFA No. 16-3929

Dear Ms. Figueroa-Contreras:

The Attorney/Consumer Assistance Program (ACAP) of The Florida Bar has received a Request for Assistance from the above indicated client. The nature of the request suggests that there may have been a lack of communication with your office which, if substantiated, could constitute a violation of certain Rules Regulating The Florida Bar, and could lead to disciplinary action by the Bar.

No disciplinary file has been opened at this time, but ACAP is requesting that you contact this client by September 30, 2015, in order that this matter might be resolved without a disciplinary file being opened and investigated.

By copy of this letter to Mr. Scotton, I am advising that should I fail to hear anything further from either of you within thirty days of the date of this letter, I will assume that the matter has been resolved. Pursuant to the Bar's records retention schedule, the computer record and file will be disposed of one year from the date of closing.

Thank you in advance for your efforts in assisting an expeditious and amicable resolution of this matter.

Sincerely,

Maura Canter, Bar Counsel  
Attorney Consumer Assistance Program  
ACAP Hotline 866-352-0707

cc: Mr. Scotton



## THE FLORIDA BAR

RIVERGATE PLAZA, SUITE M-100  
444 BRICKELL AVENUE  
MIAMI, FL 33131-2404

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

305/377-4445  
WWW.FLORIDABAR.ORG

September 1, 2015

Mr. Rogerio Chaves Scotton  
P.O. Box 2000  
Folkston, GA 31537

**Re: Attorney Kristy Figueroa-Contreras**

Dear Mr. Scotton:

I am in receipt of your complaint regarding Ms. Figueroa-Contreras. However, since Ms. Figueroa-Contreras is an attorney, your complaint is being forwarded to the Attorney Consumer Assistance Program (ACAP) of the Lawyer Regulation Division of The Florida Bar, as they handle complaints against attorneys. **Please refer any other communications regarding this matter to the address listed below:**

**The Florida Bar – ACAP  
Lawyer Regulation Department  
651 East Jefferson Street  
Tallahassee, FL 32399-2300  
(850) 561-5845**

Thank you for bringing this matter to the attention of The Florida Bar.

Very truly yours,

JACQUELYN PLASNER NEEDELMAN  
Bar Counsel  
Unlicensed Practice of Law Department-Miami

JPN:ah

cc: ACAP, The Florida Bar - Lawyer Regulation Dept., with original complaint and enclosures





## The Florida Bar

651 East Jefferson Street  
Tallahassee, FL 32399-2300

John F. Harkness, Jr.  
Executive Director

850-561-5600  
[www.FLORIDABAR.org](http://www.FLORIDABAR.org)

July 20, 2016

Mr. Rogerio Chaves Scotton  
D. Ray James Correctional Institution  
P.O. Box 2000  
Folkston, GA 31537

Re: Kristin D Figueroa-Contreras; RFA No. 16-3929

Dear Mr. Scotton:

The Florida Bar is not a conduit to communicate with your former attorney regarding a business transaction. You may call her as she suggests and communicate with your mother who is the individual who was to receive the funds.

Sincerely,

Maura Canter, Bar Counsel  
Attorney Consumer Assistance Program  
ACAP Hotline 866-352-0707



**NEGRI, TORRES &  
FIGUEROA-CONTRERAS**  
ATTORNEYS AT LAW • ABOGADOS • ADVOGADOS

ATTORNEY-CLIENT COMMUNICATIONS  
PRIVILEGED AND CONFIDENTIAL

20 July 2015

*Via FedEx*

Mr. Rogerio Chaves Scotton  
BOP Register No. 99370-004  
D. Ray James Correctional Institution  
Inmate Mail/Parcels  
P.O. Box 2000  
Folkston, GA 31537

Re: **United States v. Rogerio Scotton**  
Eleventh Circuit Case No. 14-12228-AA

Dear Mr. Scotton:

Enclosed please find Appellee's Brief, filed by Jeanne Mullenhoff on Friday, 17 July 2015.

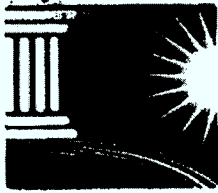
I have requested a legal call with you to resolve all pending matters relating to the representation. I need to know whether you are terminating me completely, in which case I agree that you are entitled to a return of a portion of the attorney's fees. Once you and I can agree on an amount that is reasonable, I would need authorization to remit any funds a third party. I look forward to our phone call. Thank you.

Sincere regards,

Kristin D. Figueroa-Contreras  
kristy@negri-torres.com

Enclosures:  
As stated

MIAMI OFFICE: THE MINDRCA, 2030 SOUTH DOUGLAS ROAD, SUITE 214  
CORAL GABLES, FLORIDA 33134 US  
TEL. (+1) 305-639-8599 / FAX: (+1) 305-397-1384  
WEB: WWW.NEGRI-TORRES.COM / E-MAIL: MIAMI@NEGRI-TORRES.COM



**NEGRI, TORRES &  
FIGUEROA-CONTRERAS**  
ATTORNEYS AT LAW • ABOGADOS • ADVOGADOS

**ATTORNEY-CLIENT COMMUNICATION  
PRIVILEGED AND CONFIDENTIAL**

9 June 2015

*Via Fedex Priority*  
Mr. Rogerio Chaves Scotton  
BOP Register No. 99370-004  
D. Ray James Correctional Institution  
Inmate Mail/Parcels  
P.O. Box 2000  
Folkston, GA 31537

Dear Mr. Scotton:

I hope this letter finds you well. I returned to work today after an extended personal leave of absence. As I let Counselor Franklin know via e-mail, I ended up having to stay out an extra week.

I understand that you called the office on several occasions while I was gone, requesting that I send you certain documents. I am sorry my staff was unable to figure out exactly what to send you in my absence.

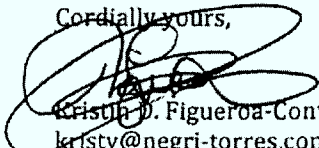
I am enclosing in this package my research in the several requested areas.

I am also currently working on getting your entire file copied for you. Would you like us to also send a copy to your mother and Mr. Colon?

As for your requested accounting of all work performed in your case this far, I am also working on getting this to you. I ask that you be patient as I review the file and figure this out. Because this was not billed on an hourly-basis, I did not keep a log of my time and thus can only promise to do my best to get you the closest possible approximate.

I would very much like to have a legal call with you once you have had the opportunity to review the enclosed. Should you wish to have a call with me, please let Counselor Franklin e-mail me to let me know. I do not anticipate taking any further leaves of absence anytime soon. Thank you.

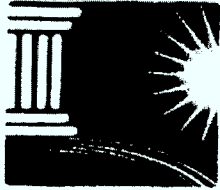
Cordially yours,



Kristy D. Figueroa-Contreras  
kristy@negri-torres.com

Enclosures

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**NEGRI, TORRES &  
FIGUEROA-CONTRERAS**  
ATTORNEYS AT LAW • ABOGADOS • ADVOGADOS

**ATTORNEY-CLIENT COMMUNICATION  
PRIVILEGED AND CONFIDENTIAL**

4 March 2015

***Via USPS Priority Mail***

Mr. Rogerio Chaves Scotton  
BOP Register No. 99370-004  
D. Ray James Correctional Institution  
Inmate Mail/Parcels  
P.O. Box 2000  
Folkston, GA 31537

**Re: FOIA Requests**

Dear Mr. Scotton:

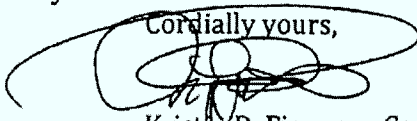
Pursuant to our conversation last night, I am re-sending the Form G-639 as well as Forms G-28 for ICE, CBP and USCIS. Please sign and return to me as soon as possible. In addition to your A-File, it is possible that CBP has records of the entries we discussed as well as notes taken at the time.

I am also returning to you the originals from your immigration file that you had given to me the last time we met.

I would like to go visit you before the end of March. I had purchased tickets on February 25, 2015 to visit you that same weekend, but Mr. Franklin advised that you did not want any visitors at that time. I am attaching proof of the reservations. The airline ticket was nonrefundable.

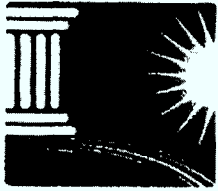
Please let me know. Thank you.

Cordially yours,

  
Kristy D. Figueroa-Contreras  
kristy@negri-torres.com

Enclosures

MIAMI OFFICE: THE MINORCA, 2030 SOUTH DOUGLAS ROAD, SUITE 214  
CORAL GABLES, FLORIDA 33134 US  
TEL. (+1) 305-639-8599 / FAX: (+1) 305-397-1384  
WEB: WWW.NEGRI-TORRES.COM / E-MAIL: MIAMI@NEGRI-TORRES.COM



**NEGRI, TORRES &  
FIGUEROA-CONTRERAS**

ATTORNEYS AT LAW • ABOGADOS • ADVOGADOS

3 de novembro de 2014

*Via USPS Regular Mail*  
Rogério Chaves Scotton  
BOP Register No. 99370-004  
D. Ray James Correctional Institution  
Inmate Mail/Parcels  
P.O. Box 2000  
Folkston, GA 31537

RECEIVED

NOV 30 2015

The Florida Bar - ACAP  
Tallahassee, Florida

Prezado Sr. Scotton:

Meus melhores cumprimentos.

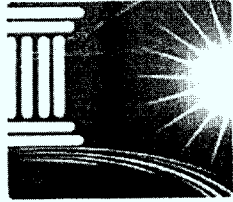
Eu sou a advogada que representou ao Sr. João Lino e seus dois empregados no seu caso criminal aqui em Miami há alguns meses atrás. Eles são os angolanos que estavam reclusos junto com o Sr. no presídio federal de Miami.

O Sr. Lino me disse que o Sr. tinha umas perguntas sobre seu caso e me pediu para entrar em contato com o Sr. Eu sou advogada criminalista e de imigração.

Por favor, guarde meu endereço e telefone e sinta-se à vontade em me contatar com as suas dúvidas. Obrigada.

Atenciosamente,

Kristin D. Figueroa-Contreras  
kristy@negri-torres.com



**NEGRI, TORRES &  
FIGUEROA-CONTRERAS**

ATTORNEYS AT LAW • ABOGADOS • ADVOGADOS

25 February 2015

**Re: *United States v. Fedex Corp., et al***  
**N.D. California Case No. CR14-00380CRB**

Dear Mr. Scotton:

I have had two telephone conversations with Mr. Kuang-Bao P. Ou-Young. He is a Taiwanese gentlemen and, as I mentioned to you previously, he was very receptive to your story.

Mr. Ou-Young feels that his biggest fight is against the DOJ. He filed for impeachment of Eric Holder through the House Judiciary Committee. As you may know, Attorney General Holder recently announced that he would be stepping down. Mr. Ou-Young wanted you to know that he had a hand in this resignation. I am not sure if this is true, but this is what he believes.

He is expecting to hear from you directly and wants to help with information. He feels he has had no luck so far in getting his day in court, and his motions to intervene in the FedEx prosecution in Northern California keep getting shot down.


Please contact Mr. Ou-Young at:

Kuang-Bao P. O-Young  
1362 Wright Avenue  
Sunnyvale, California 94087  
(408) 736-7793  
kbouyoung@yahoo.com

He reviewed the pleadings in your SD-FL case, and thinks it is best to write him as soon as possible.

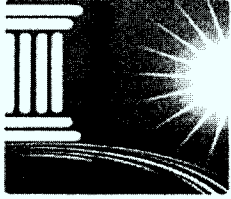
Thank you.

Best personal regards,



Kristin Figueroa-Contreras

MIAMI OFFICE: THE MINDORCA, 2030 SOUTH DOUGLAS ROAD, SUITE 214  
CORAL GABLES, FLORIDA 33134 US  
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WEB: WWW.NEGRI-TORRES.COM / E-MAIL: MIAMI@NEGRI-TORRES.COM



**NEGRI, TORRES &  
FIGUEROA-CONTRERAS**

ATTORNEYS AT LAW • ABOGADOS • ADVOGADOS

*Privileged and Confidential*

Mr. Rogerio Chaves Scotton  
BOP Register No. 99370-004  
D. Ray James CI  
P.O. BOX 2000  
Folkston, GA 31537

**Re: Multiple miscellaneous articles regarding your case**

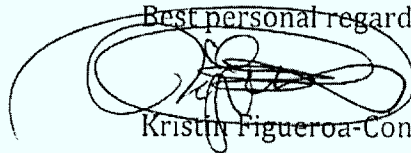
Dear Mr. Scotton:

For your reference, I am attaching multiple articles (in English, Portuguese and French) pulled from the internet regarding you and your case. Information concerning your arrest and the prosecution of your case was widely available online before and during your trial as well as thereafter.

Some of the commenters on these articles appear to know you personally.

Please feel free to discard these articles if they are not of use to you. Thank you.

Best personal regards,



Kristin Figueroa-Contreras

Enclosures

cc: Marina Colon

MIAMI OFFICE: THE MINORCA, 2030 SOUTH DOUGLAS ROAD, SUITE 214  
CORAL GABLES, FLORIDA 33134 US  
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WEB: WWW.NEGRI-TORRES.COM / E-MAIL: MIAMI@NEGRI-TORRES.COM

**EXHIBIT C**

**Carlos and Marina Colon affidavit.**



AFFIDAVIT OF CARLOS COLON

Come now hereby the affiant, Carlos Colon, who resides at 7797 golf circle drive apt 204 Margate FL, 33063 with phone number (954) 773 8344, declares and certifies under perjury that the following is truth, correct and based of personal knowledge, facts and evidence.

1. I am a United States Citizen and Air Force Disable Veteran.

2. I am currently employee at the Veteran Hospital in South FLorida.

3. I am marriage to Marina Colon who is ill and legally blind, mother of Rogerio Chaves Scotton.

4. I have been requesting via telephone call and emails to the attorney Kristy Figueroa Contreras to return the money that Mr. Joao Lino has sent to her in order to appeal Rogerio Scotton Federal Criminal Case (My step son) case number 1260049 -MORENO.

5. I have also requested attorney Contreras to respond Rogerio Scotton requested for a contract agreement and invoice to shown what she has done with the money.

6. Attorney Contreras was hired to appeal Rogerio Scotton criminal case only.

7. Attorney Contreras has charge one hundred twenty thousand dollar. (\$120,000.00) to appeal Rogerio Scotton criminal case.

8. After the money was given to Contreras she began into say that could not withdraw the court-appointed attorney, but will be working with him in the direct criminal brief appeal.

9. We requested the money back as well Joao Lino his employee Ovidio Kalips. Contreras began to tell that was working with the attorney Richard Klugh on his criminal appeal and also in his INS issue. Despite that Joao Lino has give the money for the direct appeal.

10. Emilio D'arce has told me that has already give the message to Contreras numerous times that she need to return the money. I told both Emilio D'Arce and Contreras that she was not his attorney because she has not inform the court with the proper document and the court has not advice any one that Contreras is the attorney and Richard Klugh has benn withdraw.

11. I request the retainer agreement by email numerous times, and over the phone to Emilio D'Arce. He told me that Contreras was out in another state but the message was give to her..

12. I have contact Contreras office several times to inform that she must return the money back as we need to pay another attorney that could appeal Rogerio Scotton criminal direct appeal. Since she was not, she should give the money back because was not need of her for anything else.

13. Contreras was never hired to do anything besides Rogerio Scotton direct appeal.

14. Contreras has never send any contract agreement to us or even to Rogerio Scotton before he filed the complain to the Florida Bar. And the contract Contrera has copy Rogerio Scotton with the response to the Florida Bar is forgery. She was never retained to do anything as metion in the aggrement, rather she was only hired to do his direct appeal.

15. Contreras when to prison to see Rogerio Scotton without anyone request and was after Scotton requested the money back.

16. At prison she has taking numerous documents from Rogerio Scotton in which we requested to be return back since she has not represented him.

17. Contreras intention in to take does documents was with the only reason to cover-up her misconduct and fraud. This is the truth because she took those documents and nothing has been done.

18. Joao Lino has sent from Lisboa, Portugual the

total amount of \$62,000.00 to appeal Rogerio Scotton criminal case (142228-AA).

When we request the money back (as well Joao Lino) she send to Rogerio Scotton mother a \$2,000.00 check.

This check was order from Joao Lino because he want to talk direct to Rogerio Scotton and could not because he was in prison and international call Scotton could not pay at the time. The reason for Joao Lino want to talk to Scotton was because Contreras continue to misleading him into tell that she was working on Scotton direct appeal with the Court-appoint attorney. After Scotton call Joao Lino and as well send him a letter, both Joao Lino and Ovidio Kalip has order Contrera to give the money back.

19. I am hereby to tell the truth that Contreras NEVER has sent to me, to Scotton Mother to Lino, to Ovidio or to Scotton any retainer agreement. If anyone looking into the dates on the emails you will be able to see that for several months she has lie to us and avoid to do return the money she has request to appeal Scotton criminal case.

20. I am here to inform as well Emilio D'Arce is another fraud and he should be charge for false statement. He has never sent any agreement to Scotton. Scotton mother has several times call the office of Contreras and has ask Emilio into tell Contreras to return the money or send to Scotton in prison the contract and a invoice to explain what she has done with the money. He has call my cell phone in June after Marina surgery to inform that Contreras will refund \$25,000.00. I told him that she could not talk and they need to inform Scotton

and not his mother. Days later, Emilio has call my house, left numerous message to tell the same thing. In Emilio D'Arce final call Marina told him to stop call the house and to have some dignity and respect, and if he has any problem deal with Scotton direct.

21. We have call Contreras several times in her cell phone and she has never call back. (305) 776 3025

22. The Emilio D'Arce affidavit is forgery and false. They have never give back Scotton documents from his civil case, his grievance that Contreras has taking from Scotton in prison, in which he has always send a copy to his monther to have. Every motion, letter, document sent by Rogerio Scotton to court, to attorneys, Department of justice or to anything toward his criminal case, he always copy his mothers. Because several times even Contreras like to play games into say that has not receive anything from Scotton, we sent to her a copy vial regitered mail and another via email.

23. In one occasion we have requested the money to be given to the office of Roy Black. She has never done.

24. Ovidio told me that him and Joao Lino has request the money back, but Ovidio mention that he does not believe we will see this money agains.

25. We call the office of Richard Klugh to ask if

Contreras was working with him toward Rogerio Scotton criminal direct appeal. Klugh told us that has never work with Contreras or even receive any call, any document or money in anything toward to Scotton criminal case or Scotton any case.

25. I affirm that no one has hired Contreras or her office to perform any legal work that was not in the matter Rogerio Scotton direct criminal appeal case number 1260049-MORENO Contrera should return the money that was requested 8 months ago. She has cause much more problem to us and pain to Scotton mother that continue to have her son illegally in prison.

26. I have receive the copy of the false document from Emilio D'Arce and Kristy Contreras forgery and false agreement. We cannot believe that she has done such thing.

I have also sent a copy of those forgery documents to Joao Lino as well. Contreras and Emilio should be in prison. The license the Florida Bar Association has given to her she was used to damage people.

I call many times her office and email to requested the money back so we could pay another attorney that could appeal my step-son criminal case.

Because her action my step-son continue in prison. And I do not believe that we going to see this money again. No one can't get justice in this country anymore. She has take this money from us with false promises to help my step son and no one will do anything.

I am hereby certify under the penalties of perjury that all the information declared by me is the truth.

Kristy Contreras has defraud us and serious prejudice my step son Rogerio Scotton in obtain a effective legal assistance in his criminal appeal. The money she has taking could not pay the time in prison we will endure more because her fraud.

*Carlos M. Colon*

CARLOS MANUEL COLON  
ID NUMBER: C450113574240  
7797 GOLF CIRCLE DRIVE APT 204  
MARGATE FL, 33063

**CERTIFICATION OF NOTARY PUBLIC**

STATE OF FLORIDA  
COUNTY OF: Broward

I hereby certify that this 27<sup>th</sup> day of November, 2015 the foregoing affidavit was sworn to and subscribed before me by Carlos Manuel Colon, who is present. C450-113-51-424-0

*[Signature]*  
NOTARY PUBLIC



NOTARY SEAL

**AFFIDAVIT OF MARINA COLON**

Come now by and through this affidavit Marina Colon, who resided at 7797 GOLF CIRCLE DRIVE, APARTMENT 204, MARGATE FLORIDA 33063, (954) 773 8344, declares and certifies under the penalties of perjury that the following is the truth, correct information based in my personal knowledge of facts in this matter of the firm of NEGRI, TORRES & FIGUEROS CONTRERAS, KRISTY CONTRERAS AND EMILIO D'ARCE has defraud my family, specially my son Rogerio Scotton who continue to be in prison illegally and because the disgraceful conduct of Contreras. In support of this affidavit I Marina Colon the affiant states that:

1. My name is Marina Colon, and I am a 72 years old United States Citizen, marriage to Carlos Colon and the mother of Rogerio Chaves Scotton, in which has been illegally convicted and incarcerated over 45 months.

2. In November of 2014 attorney Contreras began to call my house and to tell me and my husband that she will appeal my son (ROGERIO SCOTTON) criminal case 1260049.

3. Contreras has told me over the phone that Rogerio Scotton friend Joao Lino has sent from Portugal the amount of \$62,000.00 to began the process to appeal his criminal case.

4. Joao Lino has call me to inform that he love my son, that my son has done much more for him and he will be



help with the cost of attorney to appeal his case. Joao Lino advice that attorney Contreras has charge \$120,000.00 to appeal the conviction of my son Rogerio Scotton in front the court of appeal for the Eleventh Circuit.

5. Ovidio Kalips is Joao Lino employee. He has call me to inform that they have sent from Portugal direct to Contreras more them half of the money she ask for in order to appeal my son criminal case.

6. A month after Contreras received the money, she have told me over the phone that could not withdraw the court appointed attorney Klugh but she will be working with him in the criminal case.

7. I have give the message to my son Rogerio Scotton. After given him the message he told me to call Contreras office and requested the money back.

8. I call Contreras office cell phone and told her to give the money back since my son requested and explain that she was not told me the truth. I have told her that my son does need a effective attorney to appeal his criminal case, and since she has not done and will not do, she must give the money back. Contrera began into tell me that the reason she could not take Klugh of the case is because my son could be charge by the court for retainer her. But she will work hard with the court appointed attorney.

9. When my son Rogerio Scotton has call me back, I have inform him what Contreras has told me over the phone. My son told me to call her back to request the money back and he told me that she was misleading me with false information.

Because Joao Lino has sent the money, I call him to tell him this problem. I have told him to get the money back.

10. Joao Lino ask me to see if is possible that my son could call him. I told Joao Lino that my son could not call him due that he could not pay for a international call from prison.

11. Mr. Joao Lino and Ovidio Kalip has advice Contreras to send \$2,000.00 to put into Scotton prison account.

In February 2015 Contreras has sent to my house a check for \$2,000.00 to put into my son account in prison. (attached is the check).

12. My son told me that has also ask Joao Lino to get the money back and to give to Roy Black or John David firm. In the same day Ovidio Kalip has call to inform that they have requested Contreras to give the money back.

13. In March 2015 Contreras has disregarding what we already ask her to do (give the money back) and call me to inform that she will submitted to the court a motion to represent my son in his direct appeal and will go to the prison to see him without anyone ask her to do.

14. Contreras has not responded email or phone after

my son told her in prison to give the money back.

15. I call her office and told Emilio D'arce that she need to give the money back. She has lied to everyone and she has done nothing to help my son Rogerio Scotton in his direct appeal. So I told Emilio D'arce that it is no reason to hold the money that was given to her to appeal his criminal case since she will not do.

Emilio D'arce told me that he will give the message to Contreras.

16. Contreras has sent a grossly email to Carlos Colon to tell me to stop call her office. But still refuse to give the money back since she has not done what she was payed for.

17. Richard Klugh has advice us that has never work in this case with Contreras and send a letter to my son to let him know that.

My son them call and told Carlos Colon to sent a email to Contreras to let her know how much she has prejudice him and to give this money back or he will report this matter to the Florida Bar and to the police.

Contreras never responded.

18. My son told me that Contreras has sent him a extortion letter to force him into sign to receive \$25,000.00 toward the \$62,000.00 she has received to appeal his criminal case. If we take \$2,000.00 from the check she previous has sent she stil with \$60,000.00.

19. Contreras has never send any agreement to us or to my son. After my son submitted a complain to the Florida Bar Association, she has forgery this retainer agreement to cover-up her fraud. But does not matter because the truth was that she has been hired only to appeal my son criminal case. Instead into do appeal his case or give the money back, she sick mind believe that forgery documents is the solution.

20. Contreras has serious prejudice my son; that along took 60,000.00 illegally and over a promises to appeal his criminal case.

The problem with the justice system in this country everyone is involved. The judges, prosecutor and lawyers they are all together in this and one cover-up for the other. In this case here is clear to see that this person (Contreras) has been give license to defraud people and no one has done nothing because everyone is involved. It is clear, it is the truth, she has taking this money and one the first day she was advice to appeal my son criminal case that is on the Eleventh Circuit Court of Appeal. That she has never done anything in the matter of his appeal. No one ask her to do nothing different. She play us and she know that. I hope she understand what she has done to me and to my son since she is a mother as well.

We don't expect much to be done from the Florida Bar Association or even the department of justice, but if a investigation is conducted our phone records, our emails, the letters my son sent to her and her cell phone will clear show and prove the fraud she committed.

I truly certify that Kristy Figueroa Contreras has defraud my family and serious prejudice my son Rogerio Scotton. Her conduct should not be ignored from those that have give her a license and the department of justice.

Marina Colon  
MARINA COLON  
ID NO: C450570438870  
7797 GOLF CIRCLE DRIVE APT 204  
MARGATE FL, 33063

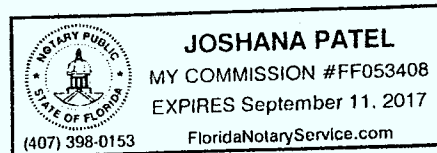
**CERTIFICATION OF NOTARY PUBLIC**

STATE OF FLORIDA  
COUNTY OF: Browns

I hereby certify that, on this day 27<sup>th</sup> of November, 2015, the foregoing affidavit with documents attached was sworn to and subscribed before me by Ms. Marina Colon, who is present.  
C450-540-43887-038



NOTARY PUBLIC, STATE OF FLORIDA



SEAL

**EXHIBIT D**

False and forgery agreement contract with a false affidavit from Contreras. Scotton Point out that Contreras come to prison in two occasion in order to cover up her fraud. If she has sent this forgery contract to Scotton before, Then why Scotton has not sign during the two occasion she was here in prison after already receive the money.



**NEGRI, TORRES &  
FIGUEROA-CONTRERAS**  
ATTORNEYS AT LAW • ABOGADOS • ADVOGADOS

29 August 2015

***Via Fedex Overnight***

Ms. Maura Canter, Bar Counsel  
The Florida Bar  
Attorney Customer Assistance Program (ACAP)  
651 E. Jefferson Street  
Tallahassee, FL 32399-2300

**Re: *Rogério Chaves Scotton; RFA No. 16-3929***

Dear Ms. Canter:

Greetings. The purpose of this letter and its attachments is to respond to your September 16, 2015 letter (copy attached) in connection with the Request for Assistance ("RFA") filed by Mr. Rogério Scotton, a federal inmate at the D. Ray James Correctional Facility in Folkston, GA.

While your letter requests that I contact Mr. Scotton directly, I was recently instructed by Mr. Scotton for my office and me to refrain from all contact with him or his family. As such, I am addressing this letter and its attachments directly to your attention, with a full and complete copy of this letter and its attachments to be sent to Mr. Scotton at the prison.

Enclosed please find the Affidavit of Emilio D'Arce, my senior legal assistant, enclosing yet another copy of the legal services agreement that Mr. Scotton now claims he never received, this despite our having mailed it to him on multiple occasions. Mr. D'Arce's Affidavit further notes that the June 1, 2015 letter attached to Mr. Scotton's RFA as Exhibit A was never received by our office. As for the itemized statement demanded by Mr. Scotton, both I and my staff explained to Mr. Scotton on multiple occasions that, because the representation was on a flat-fee, immediately earned basis in lieu of an hourly basis, we would not be issuing a monthly statement with an hourly breakdown. Further, in light of the dispute with Mr. Scotton, we are waiving collection of all out-of-pocket costs incurred by our Firm in connection with the representation. These out-of-pocket costs, as set forth in the enclosed legal services agreement, were to be paid by the same third-party payor who paid our engagement fee. Mr. Scotton is indigent.

As for the allegations made in the subject RFA and its attachments that I (1): am a "*pistoleira*" (Brazilian Portuguese for a "woman who takes money from rich older men in exchange for favors") and a "woman of the night"; and (2) have made threats to Mr.

MIAMI OFFICE: THE MINORCA, 2030 SOUTH DOUGLAS ROAD, SUITE 214  
CORAL GABLES, FLORIDA 33134 UNITED STATES  
TEL: (+1) 305-639-8599 / FAX: (+1) 305-397-1384  
WEB: WWW.NEGRI-TORRES.COM / E-MAIL: MIAMI@NEGRI-TORRES.COM

Ms. Maura Canter, Bar Counsel  
The Florida Bar  
29 September 2015  
Page 2

*Re: Rogerio Chaves Scotton; RFA No. 16-3929*

Scotton, his family and friends all are absolute fabrications. Because I have not been instructed by your office to respond to these allegations, I will state nothing further at this time, other than to certify that they are baseless and patently false.

I wholeheartedly regret that there has clearly been a breakdown of communication in this case, but this breakdown has been caused entirely by Mr. Scotton's actions. I do not take responsibility for his predicament and did my best to represent him zealously and diligently.

It is my position that the representation of Mr. Scotton has been effectively terminated under both subsections (a) and (b) of Rule 4-1.16 of the Rules Regulating the Florida Bar. Professional considerations and the Rule 4-1.16's mandatory withdrawal commentary necessitate immediate termination of the representation. Please allow this letter to serve as notice that I will be withdrawing from all pending representation while taking all reasonable steps to protect his interests, as required by Rule 4-1.16(d). Rule 4-1.16(c) is not applicable in this case.

We have mailed Mr. Scotton a full copy of his case file, including the originals he requested we return to him. Should he require a duplicate copy of his file, we ask that he please make arrangements directly with Mr. D'Arce of our office. It is a very voluminous file will take some time to duplicate.

Thank you for your prompt consideration of this matter. Should you have any questions, or should you require any additional information, please do not hesitate to contact me.

Respectfully submitted,



Kristin Figueroa-Contreras Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
FBN 643394

~~Copy to (attachments included):~~  
~~Rogerio Chaves Scotton, BOP 99370-004~~

NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
MIAMI OFFICE: THE MINDORCA, 2030 SOUTH DOUGLAS ROAD, SUITE 214  
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TEL. (+1) 305-639-8599 / FAX: (+1) 305-397-1384  
WEB: WWW.NEGRI-TORRES.COM / E-MAIL: MIAMI@NEGRI-TORRES.COM



LETTER AGREEMENT FOR LEGAL SERVICES

Rogério C. Scotton  
BOP 99370-004  
D. Ray James Correctional Institution  
Attn.: Inmate Mail/Parcels  
P.O. Box 2000  
Folkston, GA 31537

Dear Mr. Scotton:

1. The purpose of this letter is to set forth and confirm our understanding with respect to the agreement for your payment of attorneys' fees and costs, and our rendering of legal services on your behalf. Our representation pursuant to this Agreement shall become effective upon our acceptance of employment.
2. You have retained this firm to represent you in connection with your pending I-247 immigration detainer (including ATD/bond request); DHS Freedom of Information Act request and administrative appeal; Bureau of Prison civil grievance (administrative remedies); and potential 28 USC 2255 proceedings relating to *United States v. Scotton*, SDFL Case No. 12-CR-60049. You acknowledge that we have made no promises or guarantees regarding the outcome of your case. Instead, we have discussed with you the unpredictability of most legal matters, especially litigation.
3. This representation is on a flat-fee basis. The attorney's fee for this representation is a flat-fee of \$60,000 (Sixty Thousand and 00/100 U.S. Dollars). You agree that this fee is reasonable, immediately earned (earned on receipt), and is not based on an hourly rate. This fee will be deposited into our general operating account and will not be deposited into our client trust account. The Engagement Fee does not cover any costs. Even though the fee is earned on receipt, you may nevertheless discharge us at any time and in that event may possibly be entitled to a partial or total refund upon the time and value of the legal services provided prior to discharge.
4. Your Engagement Fee has been paid in its entirety by a third party, Mr. Joao Dos Santos Lino, and you have consented to this arrangement. There is no known conflict of interest, and this third-party payor does not interfere with our professional judgment or relationship with you. In accordance with Rule 4-1.6 (Confidentiality of Information), you and the third party understand that our ethical duties of confidentiality and communications are owed to you only. All decisions regarding the legal status and strategy of your case shall be discussed only with you and not the third party, unless you give express written permission. Any refund shall be returned to the party who provided the funds.
5. You are responsible for any out-of-pocket costs incurred on your behalf in connection with the representation. Typical costs include: filing fees, service of process, depositions, expert witness fees, travel expenses, long-distance telephone calls, Federal Express/UPS/DHL, courier services, photocopies (billed at \$0.15 per page), and online database retrieval charges (such as Pacer, Lexis and Westlaw). We are not taking a costs deposit to cover these costs at this time and will instead invoice and request reimbursement from you on a periodic basis. It is our understanding that the above-referenced third-party payor will be reimbursing us for all out-of-pocket costs incurred hereunder.

NEGRI, TORRES & FIGUERA-CONTRERAS, PLLC  
MIAMI OFFICE: THE MINDRCA, 2030 SOUTH DOUGLAS ROAD, SUITE 214  
CORAL GABLES, FLORIDA 33134 UNITED STATES  
TEL. (+1) 305-639-8599 / FAX: (+1) 305-397-1384  
WEB: WWW.NEGRI-TORRES.COM / E-MAIL: MIAMI@NEGRI-TORRES.COM



6. If it becomes necessary to take the deposition of a party or other witness, we may require a cost deposit. If such deposit is requested, it will be held in our trust account until we are invoiced by the court reporter.
7. If appropriate and necessary to the complete preparation of your case, we shall obtain your verbal approval for the utilization of our private investigator. He or she will then make separate arrangements with you to provide you with an itemized billing statement for services rendered and costs incurred.
8. In other cases where it is necessary to employ the services of an expert, accountant or other professional, we would appreciate your making separate arrangements with that person or firm to provide you with an itemized billing statement for services rendered and costs incurred.
9. We appreciate your expression of confidence in our work, and assure you that we will strive to obtain a resolution of this matter in a professional and cost-effective manner. Your duty is to cooperate fully with this Firm and be truthful at all times.
10. At the end of the representation, we will turn over a copy of your case file to you, at your cost. If you do not want a copy of your file, you agree the file may be destroyed in accordance with our document retention policy. Currently, it is our policy to destroy files ten (10) years after the termination of the representation.

NO GUARANTEES HAVE BEEN MADE AS TO THE FINAL OUTCOME IN THIS OR ANY LEGAL MATTER.

Please feel free to call me if you have any questions regarding the fee agreement as set forth herein. If not please execute the enclosed photocopy of this letter and return it to my office at your earliest convenience.



K. Figueroa-Contreras, Esq., on behalf of  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC

ACKNOWLEDGED AND AGREED on this \_\_\_\_\_ day of \_\_\_\_\_, 2015 by:

\_\_\_\_\_  
ROGERIO C. SCOTTON


NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
MIAMI OFFICE: THE MINORCA, 2030 SOUTH DOUGLAS ROAD, SUITE 214  
CORAL GABLES, FLORIDA 33134 UNITED STATES  
TEL. (+1) 305-639-8599 / FAX: (+1) 305-397-1384  
WEB: WWW.NEGRI-TORRES.COM / E-MAIL: MIAMI@NEGRI-TORRES.COM

**AFFIDAVIT OF EMILIO D'ARCE**

COMES NOW the Affiant, Emilio D'Arce, and declares and certifies that the following is true, correct and based on his personal knowledge.

1. I am the senior paralegal to Kristin Figueroa-Contreras, Esq. of Negri, Torres & Figueroa-Contreras, PLLC. I have been employed in this capacity for over seven (7) years.
2. I am responsible for preparing, copying and sending all correspondence on behalf of attorney Figueroa-Contreras. I am also responsible for opening, scanning and photocopying all correspondence sent to attorney Figueroa-Contreras.
3. The letter dated June 1, 2015 that is attached to Mr. Scotton's August 25, 2015 Florida Bar Inquiry/Complaint Form was never received by our office.
4. Our office has sent Mr. Scotton a copy of his retainer agreement on at least three (3) separate occasions on the past. Another copy of the retainer agreement is attached hereto as Exhibit "A".
5. Mr. Scotton has been mailed a copy of his entire file from our office.
6. Mr. Scotton attempted to call our office twice on September 24, 2015. Each time, I accepted the call and each time, the call was disconnected.

FURTHER AFFIANT SAYETH NOT.

  
 \_\_\_\_\_  
 Emilio D'Arce

**CERTIFICATION OF NOTARY PUBLIC**

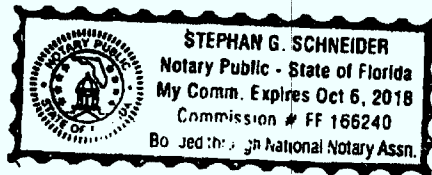
**STATE OF FLORIDA**

**COUNTY OF MIAMI DADE**

I HEREBY CERTIFY that, on this 29 day of September 2015, the foregoing was sworn to and subscribed before me by EMILIO D'ARCE, who is personally known to me.

  
 \_\_\_\_\_  
 Notary Public, State of Florida

[Affix seal here:]





**EXHIBIT E**

Numerous email communication between Scotton's family and Contrera were clear shows that the money was requested many time and that Contreras was not represent Scotton.

## Message from Marina...

Carlos Colon <taino1124@gmail.com>  
To: Kristy Figueroa-Contreras <Kristy@negri-torres.com>

Tue, Apr 28, 2015 at 7:08 PM

Yesterday I spoke with your assistant Emilio, I ask him to ask you, if Rogerio send something for me; like a message? all so if you took to him the forms of the medical records for him to sign? I could not talk to him because he did not have to much minutes to talk. Until now your assistant Emilio, has not answer me what I ask him. maybe you can answer me? Thank you Marina.

Kristy Figueroa-Contreras <Kristy@negri-torres.com>  
To: Carlos Colon <taino1124@gmail.com>

Tue, Apr 28, 2015 at 7:16 PM

Boa tarde. Lamento que eu não tenho tido o tempo para lhe escrever até agora, posto que ontem e hoje estive num julgamento e amanhã também estarei na corte no dia todo.

A visita lá na prisão foi boa. Conseguimos conversar bastante e resolvimos fazer algumas coisas.

O seu filho nao enviou nenhum recado para a Sra., e o release já foi assinado por ele. Estamos trabalhando junto com o Counselor para conseguirmos todos os records dele.

O Sr. Rogério me disse que a Sra. ia pegar o file dele da advogada de accidentes para que eu pudesse passá-lo para o advogado Weber, para ver se ele estaria interessado em tomar o caso do accidente do Sr. Rogério. Consiguiu pegá-lo?

O Sr. Rogério queria ver se o Sr. Lino estaria disposto a pagar um profissional para desenhar uma página web para informar ao público sobre o caso dele. A Sra. queria chamar ao Sr. Ovídio?

Obrigada e aguardo a gentileza da sus resposta para em breve.

Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
*Miami Office:*  
The Minorca  
2030 S. Douglas Road, Suite 214  
Coral Gables, Florida 33134  
United States  
Telephone: / Facsimile:  
E-mail:  
Skype Name: k.figueroa-contreras

Web:  
Follow me on Twitter:

PLEASE NOTE, this transmission is intended to be delivered only to the named addressee(s) and my contain information that is confidential, proprietary, attorney work-product or subject to the attorney-

**Call tomorrow after 2pm 405-639-8599**

**Kristy Figueroa-Contreras** <Kristy@negri-torres.com>  
To: Carlos Colon <taino1124@gmail.com>

Fri, May 15, 2015 at 6:47 PM

Dear Mr. Colón;

Please let Rogerio know that we have been trying to schedule an unmonitored call.

Right now I am in the middle of a big meeting, and I will not be able to talk to him tonight..

Please ask him if he could call me tomorrow Saturday after 2 PM at but keep in mind there are many important Things we cannot discuss over that monitored line. We need to get an unmonitored call ASAP

We mailed him an outline re supplemental brief and updates on the grievances as well as his immigration case.

I would rather not discuss this over email, but if ever there were a chance that you and Marina could come to my office, that would be wonderful. I can accommodate you until 8:30 PM any weekday.

Thank you.

Cordial regards,

Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
*Miami Office:*  
The Minorca  
2030 S. Douglas Road, Suite 214  
Coral Gables, Florida 33134  
United States  
Telephone: / Facsimile:  
E-mail:  
Skype Name: k.figueroa-contreras

Web:

Follow me on Twitter:

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**Kristy Figueroa-Contreras** <Kristy@negri-torres.com>  
To: Carlos Colon <taino1124@gmail.com>

Fri, May 15, 2015 at 6:50 PM

I apologize, and he's a pilot case, nothing is happened except for the appendix being filed April 16. The quarter allowed Mr. Kruger to file it out of time. He appears to still be listed on the case.

image1.PNG

Thank you.

Cordial regards,

Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC

*Miami Office:*

The Minorca

2030 S. Douglas Road, Suite 214

Coral Gables, Florida 33134

**United States**

**Telephone:** / **Facsimile:**

E-mail:

Skype Name: k.figueroa-contreras

Web:

Follow me on Twitter:

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[Quoted text hidden]

**image1.PNG**  
183K

**Kristy Figueroa-Contreras** <Kristy@negri-torres.com>  
To: Carlos Colon <taino1124@gmail.com>

Fri, May 15, 2015 at 6:51 PM

This is a better photo of the current docket:

**image1.PNG**

Thank you.

Cordial regards,

Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC

*Miami Office:*

The Minorca

2030 S. Douglas Road, Suite 214

Coral Gables, Florida 33134

**United States**

**Telephone:** / **Facsimile:**



E-mail:

Skype Name: k.figueroa-contreras

Web:

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On May 15, 2015, at 6:47 PM, Kristy Figueroa-Contreras <

> wrote:

[Quoted text hidden]

**image1.PNG**  
215K

## Message from Rogerio...

Carlos Colon <taino1124@gmail.com>  
To: Miami@negri-torres.com

Thu, Jan 29, 2015 at 10:08 PM

Rogerio want to know if you received the briefing that he send you, because if you did not received that copy, he send a copy to me that you can have. Just let me know as soon as possible so I can make a copy for you and let me know how to send to you...Thank you.

Marina Colon, Rogerio's mother

Kristy Figueroa-Contreras <Kristy@negri-torres.com>  
To: Carlos Colon <taino1124@gmail.com>

Fri, Jan 30, 2015 at 9:03 AM

Hello, thank you for your email. In the future, please write me at this email address instead, as it is my direct address and the other and address is just the general mailbox for the office.

I only received a package from Rogerio on Wednesday of this week. I don't know if it is the second time he sends it, but it is the first time that I receive it.

As for the brief, Mr. Klugh requested an additional extension, through March 2, 2015.

I waited for The unmonitored phone call that I had scheduled with Rogerio for Wednesday, but they never called me. I am not sure what happened, but I requested a call again.

Thank you.

Cordial regards,

Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
*Miami Office:*  
The Minorca  
2030 S. Douglas Road, Suite 214  
Coral Gables, Florida 33134  
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Telephone: / Facsimile:  
E-mail:  
Skype Name: k.figueroa-contreras

Web:  
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**Fwd: Reenc. SCOTTON, Rogerio (99370-004) Legal visit at prison for Sunday, April 26, 2015 (10:00 a.m. to close)**

Kristy Figueroa-Contreras <Kristy@negri-torres.com>  
To: Carlos Colon <taino1124@gmail.com>

Tue, Apr 7, 2015 at 4:38 AM

Mr Colon

Good morning. It is 4:33 am. I see that you forwarded my email to Mr Ovidio, as he forwarded to me again. Ms Marina is not understanding me, and this is not productive. I simply email her to keep her informed, but maybe my English is not clear to her.. Instead of emailing her so that she just forwards it to Mr Ovidio, I will have Mr Rogerio explain directly in Portuguese to her. I hope they let me speak with him tomorrow. All legal phone calls must be scheduled in ADVANCE through Mr Franklin. He did not answer the phone on Friday at all, even though when I spoke with Mr.Rogerio on Wednesday, Mr Franklin agreed to another call on Friday. I cannot simply call and ask for Mr. Rogerio and they go get him. I have many things that Mr Rogerio requested me to do last time we spoke, and I must speak directly with him about this. . From now on, I will ask that Mr Rogerio be the one to provide his mother with all information instead of taking the time to do it myself. It is not productive for Ms Marina to second-guess and misunderstand almost every single thing I write her. I feel I am confusing her. I am not upset with her, just disappointed that she is not understanding me.

Thank you.

Cordial regards,

Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
*Miami Office:*  
The Minorca  
2030 S. Douglas Road, Suite 214  
Coral Gables, Florida 33134  
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Begin forwarded message:

**From:** Ovidio Kalipe <[redacted]>  
**Date:** April 6, 2015 at 11:46:49 PM EDT  
**To:** Kristy Figueroa-Contreras <[redacted]>  
**Subject:** Reenc. SCOTTON, Rogerio (99370-004) Legal visit at prison for Sunday, April 26, 2015 (10:00 a.m. to close)

----- Mensagem original -----

De : Carlos Colon < >  
Data:07/04/2015 00:56 (GMT+00:00)  
Para: Ovidio Kalipe < >  
Cc:  
Assunto: Fwd: SCOTTON, Rogerio (99370-004) Legal visit at prison for Sunday, April 26, 2015 (10:00 a.m. to close)

Ovídio, Marina quer que você leia este correio electronica traducalo primeiro só não sebe Inglês, agora la advogada fala que e só advogada de immigracaon...Tchau

Carlos M. Colon

----- Forwarded message -----

From: Kimiko Tejada <Kimiko@negri- >  
Date: Mon, Apr 6, 2015 at 7:11 PM  
Subject: Re: SCOTTON, Rogerio (99370-004) Legal visit at prison for Sunday, April 26, 2015 (10:00 a.m. to close)  
To: Carlos Colon < >, "gfranklin@geogroup.com" <gfranklin@geogroup.com>

Ms. Colon

Whether Rogerio actually wants her to enter a formal appearance in the Eleventh Circuit, this something that she is to discuss with Ms. Anderson and Mr. Scotton. It is my understanding that Rogerio and Ms. Figueroa were deciding this matter and Ms. Anderson would be formally appearing on Mr. Scotton's behalf and Ms. Figueroa would assist her in a secondary capacity.

However, yes, Mr. Scotton has signed three G-28 Notices of Appearance of Attorney naming Ms. Figueroa as his attorney for Customs and Border Protection, Immigration and Customs Enforcement and U.S. Citizenship and Immigration Services and Ms. Figueroa is currently working with ICE to have Mr. Scotton's I-247 detainer lifted so that he can qualify for a bond pending appeal.

She has also entered an EOIR-28 Notice of Appearance at the Executive Office for Immigration Review, as they believe a Notice to Appear has already been issued and he may already have a file with immigration court, directly relevant to his immigration fraud conviction.

Mr. Scotton requested that she go visit him at D. Ray James as soon as possible, and she is reserved to be there on April 26. She was going to travel earlier than that, but her father's surgery did not go well last Wednesday.

Please let us know if you have any questions. Ms. Figueroa is in court tomorrow morning, but she appears to be free in the early afternoon, in case you would like to set up a phone call.

Thank you.

Kimiko Tejada  
Legal Assistant to Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
*Miami Office:*  
The Minorca  
2030 S. Douglas Road, Suite 214  
Coral Gables, Florida 33134  
United States  
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E-mail:

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From: Carlos Colon < >  
Date: Mon, 6 Apr 2015 19:00:16 -0400  
To: Kimiko Tejada < >  
Subject: Re: SCOTTON, Rogerio (99370-004) Legal visit at prison for Sunday, April 26, 2015 (10:00 a.m. to close)

Ms. Kimiko, in the appeal court do not count that Ms. Figueroa it is Rogerio's lawyer or representative for any reason. She has not send any documents to the court, explain it that she is his lawyer, until she send a register document with proof that she is his case. For this reason she is not his representative like Mr. Klugh was. His mother said so...Marina Colon Rogerio's mother.

Carlos M. Colon

On Mon, Apr 6, 2015 at 6:32 PM, Kimiko Tejada < > wrote:  
Dear Counselor Franklin:

Ms. Kristin Figueroa-Contreras represents Rogerio Scotton, BOP 99370-004. She would like to set up a visit at D Ray James for Sunday April 26, 2015 from 10 a.m. to close.

Please be advised that attorney Figueroa-Contreras' flight arrives in Jacksonville on 04/26/2015 at 8:26 AM, which means that once she rents the car and drives up to the prison, she would likely be there by 10 or 10:30 a.m. Her departure flight is at 9:40 PM, so she would be able to stay until 6:30 p.m.

The last time Ms. Figueroa-Contreras went there, she was prevented from seeing Mr. Scotton

again on Sunday. This time, she wants to be certain that she can meet with him all day that Sunday and that this were confirmed as far enough in advance as possible.

Kindly confirm the above. Thank you.

Kimiko Tejada  
Legal Assistant to Kristy Figueroa-Contreras, Esq.  
**NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC**  
*Miami Office:*  
The Minorca  
2030 S. Douglas Road, Suite 214  
Coral Gables, Florida 33134  
United States  
Telephone: / Facsimile:  
Web:  
E-mail:

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**SCOTTON, Rogerio (99370-004) Legal visit at prison for Sunday, April 26, 2015  
(10:00 a.m. to close)**

Kimiko Tejada <Kimiko@negri-torres.com>

Mon, Apr 6, 2015 at 6:32 PM

To: Carlos Colon <taino1124@gmail.com>, Kristy Figueroa-Contreras <Kristy@negri-torres.com>, "gfranklin@geogroup.com" <gfranklin@geogroup.com>

Dear Counselor Franklin:

Ms. Kristin Figueroa-Contreras represents Rogerio Scotton, BOP 99370-004. She would like to set up a visit at D Ray James for Sunday April 26, 2015 from 10 a.m. to close.

Please be advised that attorney Figueroa-Contreras' flight arrives in Jacksonville on 04/26/2015 at 8:26 AM, which means that once she rents the car and drives up to the prison, she would likely be there by 10 or 10:30 a.m. Her departure flight is at 9:40 PM, so she would be able to stay until 6:30 p.m.

The last time Ms. Figueroa-Contreras went there, she was prevented from seeing Mr. Scotton again on Sunday. This time, she wants to be certain that she can meet with him all day that Sunday and that this were confirmed as far enough in advance as possible.

Kindly confirm the above. Thank you.

Kimiko Tejada  
Legal Assistant to Kristy Figueroa-Contreras, Esq.  
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Carlos Colon <taino1124@gmail.com>

Mon, Apr 6, 2015 at 7:00 PM

To: Kimiko Tejada <Kimiko@negri-torres.com>

Ms. Kimiko, in the appeal court do not count that Ms. Figueroa it is Rogerio's lawyer or representative for any reason.

She has not send any documents to the court, explain it that she is his lawyer, until she send a register document with proof that she is his case. For this reason she is not his representative like Mr. Klugh was. His mother said so...Marina Colon Rogerio's mother.

Carlos M. Colon

[Quoted text hidden]

Kimiko Tejada <Kimiko@negri-torres.com>

Mon, Apr 6, 2015 at 7:11 PM

To: Carlos Colon <taino1124@gmail.com>, "gfranklin@geogroup.com" <gfranklin@geogroup.com>

Ms. Colon

Whether Rogerio actually wants her to enter a formal appearance in the Eleventh Circuit, this something that she is to discuss with Ms. Anderson and Mr. Scotton. It is my understanding that Rogerio and Ms. Figueroa were deciding this matter and Ms. Anderson would be formally appearing on Mr. Scotton's behalf and Ms. Figueroa would assist her in a secondary capacity.

However, yes, Mr. Scotton has signed three G-28 Notices of Appearance of Attorney naming Ms. Figueroa as his attorney for Customs and Border Protection, Immigration and Customs Enforcement and U.S. Citizenship and Immigration Services and Ms. Figueroa is currently working with ICE to have Mr. Scotton's I-247 detainer lifted so that he can qualify for a bond pending appeal.

She has also entered an EOIR-28 Notice of Appearance at the Executive Office for Immigration Review, as they believe a Notice to Appear has already been issued and he may already have a file with immigration court, directly relevant to his immigration fraud conviction.

Mr. Scotton requested that she go visit him at D. Ray James as soon as possible, and she is reserved to be there on April 26. She was going to travel earlier than that, but her father's surgery did not go well last Wednesday.

Please let us know if you have any questions. Ms. Figueroa is in court tomorrow morning, but she appears to be free in the early afternoon, in case you would like to set up a phone call.

Thank you.

Kimiko Tejada  
Legal Assistant to Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
*Miami Office:*  
The Minorca  
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## Mensagem de Marina...

Carlos Colon <taino1124@gmail.com>  
To: Kristy Figueroa-Contreras <Kristy@negri-torres.com>

Mon, May 4, 2015 at 9:25 PM

Rogério ligou e pergunto si você não vai mandar a correcao da apelcao que ele lhe entregou si ate 5a feira não chegou as mais dele, ele vai mandar na 6a feira o que ele tem. Pergunto si você recebeu a encomenda que eu Marina lhe envie 5a feira passada pelo correio de Deerfield Beach? seu assistente Emílio, falo hoje que não as recebeu nada.

Atenciosamente Marina

Kristy Figueroa-Contreras <Kristy@negri-torres.com>  
To: Carlos Colon <taino1124@gmail.com>

Tue, May 5, 2015 at 6:40 AM

Muito obrigada. Enviarei aquilo antes do final da semana. Não recebi a encomenda. Preciso disto urgente para ver se o advogado Weber estaria disposto a tomar o caso. O Dr. Weber ainda não falou que sim, ele precisa ver os documentos. Já faz mais de três meses que estou pedindo estes documentos da senhora.

E já deixei mensagem para o Warden Johns sobre a situação que está passando o Sr Rogério.  
Thank you.

Cordial regards,

Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
*Miami Office:*  
The Minorca  
2030 S. Douglas Road, Suite 214  
Coral Gables, Florida 33134  
United States  
Telephone: / Facsimile:  
E-mail:  
Skype Name: k.figueroa-contreras

Web:  
Follow me on Twitter:

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[Quoted text hidden]

sept 7 / 15

Ovi'dio:

Dias atrás lhe pedi que por favor enviasse o recibo do dinheiro 62 mil dolares que foram enviados para a advogada Eric Figueras, para defender o Rogério, o que ela nada fez, e também os meios que ela lhe deu. Peço por favor esclarecer e mandar. Rogério também já lhe pediu várias vezes. Se não puder ou não quer favor avisar.

Obrigada Maxima

Q: Onde?

Dias atrás ele pediu que  
por favor entrasse o ruído do  
dentinho bônus do fone que  
João enviava para a  
advogada Dêis Figueira,  
para atender o Rogério,  
que ele manda seg, e também  
os irmãos que ele lhe manda.  
Deu por favor explicar e  
mandar o Rogério também  
já lhe pediu várias vezes.  
Se não puder o não quer  
favor avisar... Brigada Mulher



MAILBOX FULL

---

**FW: 14-12228-AA USA v. Rogerio Scotton "Appendix Overdue"**

---

Kristy Figueroa-Contreras <Kristy@negri-torres.com>  
To: Carlos Colon <taino1124@gmail.com>

Fri, Mar 27, 2015 at 12:29 PM

Dear Mr. Colon:

Rogerio has asked that I forward all entries to your address. Please see "Appendix Overdue" below.

Thank you.

Cordial regards,

Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
*Miami Office:*  
The Minorca  
2030 S. Douglas Road, Suite 214  
Coral Gables, Florida 33134  
United States  
Telephone: (+1) 305-639-8599 / Facsimile: (+1) 305-397-1384  
E-mail: kristy@negri-torres.com  
Skype Name: k.figueroa-contreras

Web: <http://www.negri-torres.com>  
Follow me on Twitter: <https://www.twitter.com/ImmCrimDefense>

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From: "ecf\_help@ca11.uscourts.gov" <ecf\_help@ca11.uscourts.gov>  
Date: Friday, March 27, 2015 at 10:54 AM  
To: Kristy Figueroa-Contreras <Kristy@negri-torres.com>  
Subject: 14-12228-AA USA v. Rogerio Scotton "Appendix Overdue"

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United States Court of Appeals for the Eleventh Circuit

**Notice of Docket Activity**

The following transaction was filed on 03/27/2015

Case Name: USA v. Rogerio Scotton

**Case Number:** 14-12228

**Document(s):** Document(s)

**Docket Text:**

Appellant Rogerio Chaves Scotton has been notified by letter that the appendix is overdue and a motion for leave to file out of time is due within 14 days from this notice.

**Notice will be electronically mailed to:**

Richard Carroll Klugh, Jr.  
Jeanne Marie Mullenhoff  
Kathleen Mary Salyer

The following document(s) are associated with this transaction:

**Document Description:** DIS-1 Notice to Counsel/Parties

**Original Filename:** /opt/ACECF/live/forms/david\_thomas\_1412228\_7427829\_DIS-1Deficiency\_163.pdf

**Electronic Document Stamp:**

[STAMP acecfStamp\_ID=1160056652 [Date=03/27/2015] [FileNumber=7427829-0] [

22565b4655790059d5a8eb64d62fec295b9964d3451e7a8e3ff4577fa4a0e5cd145dd733b7d5da735fc059d9f2  
bf284613cbc39185fb48d6699fac93bd82f923]]

**Recipients:**

- Richard Carroll Klugh, Jr.
- Jeanne Marie Mullenhoff
- Kathleen Mary Salyer

Thank you.

Cordial regards,

Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
*Miami Office:*  
The Minorca  
2030 S. Douglas Road, Suite 214  
Coral Gables, Florida 33134  
**United States**  
**Telephone:** / **Facsimile:**  
E-mail:  
Skype Name: k.figueroa-contreras

Web:  
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[Quoted text hidden]

**Image1.PNG**  
183K

**Kristy Figueroa-Contreras** <Kristy@negri-torres.com>  
To: Carlos Colon <taino1124@gmail.com>

Fri, May 15, 2015 at 6:51 PM

This is a better photo of the current docket:

image1.PNG

Thank you.

Cordial regards,

Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
*Miami Office:*  
The Minorca  
2030 S. Douglas Road, Suite 214  
Coral Gables, Florida 33134  
**United States**  
**Telephone:** / **Facsimile:**

## Message from Rogerio...

**Carlos Colon** <taino1124@gmail.com>  
To: Kristy Figueroa-Contreras <Kristy@negri-torres.com>

Mon, Jun 15, 2015 at 9:18 PM

I do not want to SEND this or any message to you, but I am being force to do so...Carlos Colon

Rogerio want me to send you this message...He need you, to contact him s soon as possible. He want you to send him the four motins that Mr. Klung did continuance for his appeal. All so send urgently the record of his call to Mr. Klung from December 2014 to May 2015. Please respond to Rogerio (not to me) as soon as possible...  
Thank you.

**Kristy Figueroa-Contreras** <Kristy@negri-torres.com>  
To: Carlos Colon <taino1124@gmail.com>

Mon, Jun 15, 2015 at 9:51 PM

Received and understood,

Thank you.

Cordial regards,

Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
*Miami Office:*  
The Minorca  
2030 S. Douglas Road, Suite 214  
Coral Gables, Florida 33134  
United States  
Telephone: / Facsimile:  
E-mail:  
Skype Name: k.figueroa-contreras

Web:  
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On Jun 15, 2015, at 9:18 PM, Carlos Colon < > wrote.

I do not want to SEND this or any message to you, but I am being force to do so Carlos Colon

Rogerio want me to send you this message. He need you, to contact him s soon as possible. He want you to send him the four motins that Mr. Klung did continuance for his appeal. All so send urgently the record of his call to Mr. Klung from December 2014 to May 2015. Please respond to

## Message from Rogerio...

Carlos Colon <taino1124@gmail.com>  
To: Kristy Figueroa-Contreras <Kristy@negri-torres.com>

Sun, May 17, 2015 at 10:13 PM

Rogerio is asking for you to call him this week, the briefing do not need to be send any more. You said that you are going to send it to him over a week ago and it never arrived. He can not talk to you on the phone, when he call you in the phone because he spend his minutes and you assistant Emilio never now anything about you. He ask for you to urgently send his mother a copy of the Immigration detention, so she can send to him by mail or maybe you can send it to him if you thing that he is going to get it. The time is running and nothing it is happening on his case. What it is the big deal?

Kristy Figueroa-Contreras <Kristy@negri-torres.com>  
To: Carlos Colon <taino1124@gmail.com>

Mon, May 18, 2015 at 6:54 AM

I have been trying to get an unrecorded call with him. My father is in the hospital and very ill, which is why I have not been available to speak over my cell. Regardless, I do not like speaking on a recorded line with him.

We did indeed mail him a packet last week.

Quite frankly, I am tired of you and Ms. Marina constantly accusing me and sending me offensive messages.

I will deal directly with Mr. Rogerio.

Thank you.

Cordial regards,

Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
*Miami Office:*  
The Minorca  
2030 S. Douglas Road, Suite 214  
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Skype Name: k.figueroa-contreras

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[Quoted text hidden]



**Carlos Colon** <taino1124@gmail.com>  
To: **Ovidio Kalipe** <ovidiokalipe@hotmail.com>

Wed, May 20, 2015 at 9:15 PM

Isto e desagradavel! Hoje Rogerio disse todo para voces. isto nao e nada ofensivo es lo que Rogerio pide para manda para ella. Nao comunique nada a ella... Obrigada Marina  
[Quoted text hidden]

**FW: 14-12228-AA USA v. Rogerio Scotton "Transcript Order Form Processed"**

Kristy Figueroa-Contreras <Kristy@negri-torres.com>  
To: Carlos Colon <taino1124@gmail.com>, Emilio D'Arce <Emilio@negri-torres.com>

Mon, Mar 23, 2015 at 4:54 PM

Greetings Sr. Colon

Please advise Ms. Colon that Counselor Franklin e-mailed to state that was unable to give me the phone call with Rogerio today, but he asked that I call in at 10:30 a.m. tomorrow (Tuesday), so I hope to speak with Rogerio tomorrow at 10:30.

Below is the latest transaction from the appeal, dated 23 March 2015. It is simply a confirmation that the transcript order of the jury selection proceedings has been processed.

Thank you.

Cordial regards,

Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
*Miami Office:*  
The Minorca  
2030 S. Douglas Road, Suite 214  
Coral Gables, Florida 33134  
United States  
Telephone: / Facsimile:  
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Skype Name: k.figueroa-contreras

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**From:** " " < >  
**Date:** Monday, March 23, 2015 at 1:04 PM  
**To:** Kristy Figueroa-Contreras < >  
**Subject:** 14-12228-AA USA v. Rogerio Scotton "Transcript Order Form Processed"

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---

**Carlos Colon** <taino1124@gmail.com>

Fri, Mar 13, 2015 at 10:27 AM

To: Kristy Figueroa-Contreras <Kristy@negri-torres.com>

It is being 2 days that Rogerio do not have minutes to call home, the last time he called he said that he was running out of minutes. I believe it is better for you to call him and do not wait until he call home to get this message, it may be to late due to a lack of minutes on his account...Thank you.

Carlos M. Colon

70c2901527  
[Quoted text hidden]

---

**Kristy Figueroa-Contreras** <Kristy@negri-torres.com>

Fri, Mar 13, 2015 at 10:32 AM

To: Carlos Colon <taino1124@gmail.com>

Good morning. I spoke with him last night, but I reminded him not to mention anything confidential. We have requested an unmonitored call be scheduled so we can call in to Counselor Franklin this afternoon.

Thank you.

Cordial regards,

Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
*Miami Office:*  
The Minorca  
2030 S. Douglas Road, Suite 214  
Coral Gables, Florida 33134  
United States  
Telephone: (305) 351-3838 / Facsimile: (305) 351-3838  
E-mail: [kristy@negri-torres.com](mailto:kristy@negri-torres.com)  
Skype Name: k.figueroa-contreras

<https://mail.google.com/mail/u/0/?ui=2&ik=0fbf44725f&view=p...> 3/13/2015



Carlos Colon <taino1124@gmail.com>

---

## Phone call

3 messages

---

**Kristy Figueroa-Contreras** <Kristy@negri-torres.com>

Thu, Mar 12, 2015 at 6:33 PM

To: Carlos Colon <taino1124@gmail.com>

Hi, Rogerio was trying to call me, I believe. I pressed "1" by accident and it hung up. Please have him try me again at 395-776-3025. I am away from Miami

Thank you.

Cordial regards,

Kristy Figueroa-Contreras, Esq.  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC

*Miami Office:*

The Minorca

2030 S. Douglas Road, Suite 214

Coral Gables, Florida 33134

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Telephone: (+1) 305-639-9599 / Facsimile: (+1) 305-639-9514

E-mail: [kristy@negri-torres.com](mailto:kristy@negri-torres.com)

Skype Name: k.figueroa-contreras

Web: <http://www.negri-torres.com>

Follow me on Twitter: <https://www.twitter.com/negri-torres>

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<https://mail.google.com/mail/u/0/?ui=2&ik=0fbf44725f&view=p...> 3/13/2015

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---

**Carlos Colon** <taino1124@gmail.com>

Mon, Apr 6, 2015 at 7:00  
PM

To: Kimiko Tejada <Kimiko@negri-torres.com>

Ms. Kimiko, in the appeal court do not count that Ms. Figueroa it is Rogerio's lawyer or representative for any reason. She has not send any documents to the court, explain it that she is his lawyer, until she send a register document with proof that she is his case. For this reason she is not his representative like Mr. Klugh was. His mother said so...Marina Colon Rogerio's mother.

Carlos M. Colon  
7862991636  
[Quoted text hidden]

Carlos Colon <taino1124@gmail.com>

---

**SCOTTON, Rogerio (99370-004) Legal visit at prison for  
Sunday, April 26, 2015 (10:00 a.m. to close)**

2 messages

Mon, Apr 6, 2015 at 6:32  
PM

Kimiko Tejada <Kimiko@negri-torres.com>

To: Carlos Colon <taino1124@gmail.com>, Kristy Figueroa-Contreras  
<Kristy@negri-torres.com>, "gfranklin@geogroup.com"  
<gfranklin@geogroup.com>

Dear Counselor Franklin:

Ms. Kristin Figueroa-Contreras represents Rogerio Scotton, BOP 99370-004. She would like to set up a visit at D Ray James for Sunday April 26, 2015 from 10 a.m. to close.

Please be advised that attorney Figueroa-Contreras' flight arrives in Jacksonville on 04/26/2015 at 8:26 AM, which means that once she rents the car and drives up to the prison, she would likely be there by 10 or 10:30 a.m. Her departure flight is at 9:40 PM, so she would be able to stay until 6:30 p.m.

The last time Ms. Figueroa-Contreras went there, she was prevented from seeing Mr. Scotton again on Sunday. This time, she wants to be certain that she can meet with him all day that Sunday and that this were confirmed as far enough in advance as possible.

Kindly confirm the above. Thank you.

Kimiko Tejada

Legal Assistant to Kristy Figueroa-Contreras, Esq.

**NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC**

*Miami Office:*

The Minorca

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Gmail - Rogerio Scotton



Carlos Colon <taino1124@gmail.com>

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**Rogerio Scotton**

1 message

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**Emilio D'Arce** <Emilio@negri-torres.com>

Thu, May 21, 2015 at 12:19 PM

To: Carlos Colon <taino1124@gmail.com>

Buenas Sra. Colon. Espero sue ud este bien. Le aviso por este medio que la doctora esta fuera de la oficina hasta el martes que vine, pero yo me encargo de enviar por servicio expedito las copias a su hijo.

Su hijo va a recibir las copias mañana, y ya se programo una llamada a la prisión el martes a las 2pm.

Saludes,

Emilio D'Arce, Senior Paralegal  
NEGRI, TORRES & FIGUEROA-CONTRERAS, PLLC  
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