

IN THE SUPREME COURT OF FLORIDA
(Before a Referee)

THE FLORIDA BAR,

Complainant,

v.

ANDREA MARIE ROEBUCK,

Respondent.

Supreme Court Case
No. SC21-1558

The Florida Bar File Nos.
2019-30,319 (5B);
2019-30,611 (5B);
2019-30,718 (5B)

RESPONDENT'S ANSWER

COMES NOW, ANDREA MARIE ROEBUCK, Respondent, and files her Answer to the Complaint of The Florida Bar, and admits or denies the allegations as follows:

1. Admit.
2. Admit.
3. Admit.
4. Without knowledge.
5. Admit.
6. Admit.
7. Admit.
8. Admit.
9. Admit.

10. Admit.
11. Admit.
12. Admit.
13. Admit.
14. Admit.
15. Admit.
16. Deny as plead.
17. Admit.
18. Admit.
19. Admit.
20. Admit.
21. Admit.
22. Admit.
23. Admit.
24. Without knowledge. Supposed to be an attorney on each file.
25. Admit.
26. Admit.
27. Admit.
28. Without knowledge.
29. Admit.

30. Admit.

31. Admit.

32. Admit.

33. Without knowledge.

34. Admit.

35. Admit.

36. Admit.

37. Admit.

38. Admit that Respondent supervised and communicated regularly with the paralegal in charge of the timeshare case managers.

39. Admit.

40. Without knowledge.

41. Without knowledge. Admit that Glen Piccard approached Lim and Respondent to discuss working with Attorney Campbell on foreclosure matters.

42. Admit.

43. Admit.

44. Admit.

45. Admit.

46. Admit.

47. Without knowledge.

48. Admit.

49. Without knowledge.

50. Admit.

51. Admit.

52. Admit.

53. Admit.

54. Admit that Lim was to point Campbell in right direction for
bankruptcy – bootcamp offered for new practitioners.

55. Admit.

56. Admit.

57. Admit.

58. Admit.

59. Deny as pled.

60. Admit.

61. Deny as pled. Noted that Campbell may have made these
allegations.

62. Deny as pled. Noted that Campbell may have made these
allegations.

63. Without knowledge, in part since Federal Bankruptcy pleadings and the Federal non-Bankruptcy pleadings continued to go to Campbell.

64. Admit.

65. Admit that there were calendaring systems in use by office staff, one used by Respondent for Best Defense Law through Google and another Respondent did not use through Practice Panther. Admit that there was another legal software for Bankruptcy only that was not used by Respondent, but this legal software was used by office staff for Bankruptcy.

66. Without knowledge as to what Attorney Campbell supervised and allowed to be filed by staff on his behalf.

67. Admit.

68. Admit.

69. Admit.

70. Admit.

71. Admit that Respondent was counsel of record on the foreclosure claims.

72. Admit that Respondent was counsel of record on the foreclosure claims.

73. Admit that Respondent was counsel of record on the foreclosure claims.

74. Deny as pled.

75. Admit.

76. Admit.

77. Admit that timeshare unit owners believed respondent to be their attorney because they had to execute their power of attorney for Respondent.

78. Admit that timeshare case managers were always located in another office suit in the same office building. Admit that Respondent supervised and communicated on a regular basis with the paralegal in charge of the timeshare case managers that reported to her.

79. Admit.

80. Admit.

81. Admit.

82. Admit.

83. Admit.

84. Admit.

85. Admit.

86. Admit.

87. Admit.

88. Admit.

89. Admit.

90. Admit.

91. Admit that Raman spectroscopy has been long accepted in the Scientific community. Admit that Raman spectroscopy has not yet gained acceptance in a courtroom when it comes to foreclosure matters.

92. Admit that Raman spectroscopy has been long accepted in the Scientific community. Admit that Raman spectroscopy has not yet gained acceptance in a courtroom when it comes to foreclosure matters.

93. Admit that material was provided to Respondent by Boling. Admit that material provided to Respondent by Boling was reviewed and edited if it was to be used by Respondent.

94. Admit.

95. Admit.

96. Admit.

97. Admit.

98. Admit.

99. Admitted, though this was not reflective of any intent to mislead.

100. Neither admitted nor denied. Respondent denies enabling any actions by others and she is without knowledge was to Boling and Howell's objectives.

101. Without knowledge.
102. Without knowledge.
103. Admit.
104. Without knowledge.
105. Admit.
106. Without knowledge.
107. Admit.
108. Without knowledge.
109. Admit that Respondent was working on timeshare cases from April through September of 2018.
110. Admit.
111. Deny as pled.
112. Deny as pled.
113. Deny as pled.
114. Admit that timeshare companies work off a lead system.
115. Admit that timeshare companies work off a lead system.
116. Admit.
117. Admit.
118. Admit.
119. Without knowledge.

120. Admit.

121. Admit.

122. Deny.

123. Admit that Respondent was in violation of a local rule in the USDC, Middle District of Florida Orlando Division.

124. Admit.

125. Admit.

126. Admit.

127. Admit.

128. Admit.

129. Admit.

130. Admit.

131. Admit.

132. Admit.

133. Admit that Campbell left Best Defense Law in late March 2018.

134. Admit that a response was filed, without knowledge that it was with the assistance of Bosecker.

135. Admit.

136. Admit that a reply was filed, without knowledge that it was with the assistance of Bosecker.

137. Admit that Respondent appeared as counsel for Jodell Altier.

138. Admit

139. Admit

140. Admit

141. Admit

142. Admit

143. Admit that Jodell Altier delegated legal matters to her husband.

Admit that Jodell Altier made mention of contact with Bosecker and suggested Bosecker was the one that assisted drafting documents.

144. Admit

145. Admit that testimony was provided from Jodell Altier. Without knowledge as to if that testimony is correct.

146. Admit for Altier matter Bosecker did not assist Respondent with any filings by her. Attorney Shealy assisted with court filings in the Altier matter from time of his appearance up until his withdrawal.

147. Admit that Respondent worked with Bosecker at Titans Reserve Group. Admit that Bosecker did not work on foreclosures cases for Resilient Group.

148. Admit.

149. Admit.

150. Admit.

151. Admit.

152. Admit.

153. Admit.

154. Without knowledge if Mr. Altier communicated with Campbell or
Lim. Admit that Lim appeared at a February 2018 hearing.

155. Admit.

156. Admit.

157. Admit.

158. Admit.

159. Admit.

160. Admit.

161. Admit.

162. Admit.

163. Admit.

164. Admit.

165. Admit.

166. Admit.

167. Admit.

168. Admit.

169. Admit.

170. Admit.

171. Admit.

172. Admit.

173. Deny as pled. Respondent did not make any intentional misrepresentations at deposition or at a hearing.

174. Deny as pled. Respondent did not make any intentional misrepresentations at deposition or at a hearing.

175. Deny as pled. Respondent did not make any intentional misrepresentations at deposition or at a hearing.

176. Deny as pled. Respondent did not make any intentional misrepresentations at deposition or at a hearing.

177. Admit.

178. Deny.

179. Without knowledge.

180. Admit.

181. Without knowledge.

182. Admit.

183. Admit.

184. Admit.

185. Admit.
186. Admit.
187. Admit.
188. Admit.
189. Admit.
190. Without knowledge.
191. Admit.
192. Admit. Respondent relief on staff to provide this information.
193. Deny as pled.
194. Admit.
195. Admit.
196. Admit.
197. Deny.
198. Supplemental Response 1. – Any allegation not specifically admitted is denied.
199. Supplemental Response 2. – “Deny as pled” used above generally means that while aspects of an allegation may be accurate, the Respondent cannot agree with the characterization or implication of the paragraph in question.

Respectfully submitted this 30th day of November, 2021.

/s/ Barry Rigby
Barry W. Rigby, Esq.
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Counsel for the Respondent,
Andrea Marie Roebuck

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished to the Honorable Alicia R. Washington, 410 Saint Johns Avenue, Courtroom 217, Palatka, Florida, 32177, at tblaha@circuit7.org; Laura N. Gryb, Bar Counsel, 1000 Legion Place, Suite 1625, Orlando, Florida 32801, via email to lgryb@floridabar.org; dsullivan@floridabar.org; and to Staff Counsel, The Florida Bar, 651 East Jefferson Street, Tallahassee, FL 32399-2300, via email to psavitz@floridabar.org, this 30th day of November, 2021.

/s/ Barry Rigby
Barry W. Rigby, Esq.
Fla. Bar No. 613770

NOTICE OF TRIAL COUNSEL AND DESIGNATION OF EMAIL ADDRESSES

The trial counsel for the Respondent in this matter is Barry Rigby, whose address is Law Offices of Barry Rigby, P.A., 1881 Lee Road, Winter Park, FL 32789, whose primary email address is barryrigbylaw@gmail.com, and secondary email address is rigbylaw@yahoo.com. Complainant need not address pleadings, correspondence, etc. intended for Respondent to anyone other than trial counsel.