



THE FLORIDA BAR

1200 EDGEWATER DRIVE
ORLANDO, FL 32804-6314

LAWYER REGULATION DEPARTMENT 407/425-5424
UPL DEPARTMENT 407/425-0473

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

March 23, 2000

Mr. Eddie Kahn
American Rights Litigators
2390 Old U.S. Highway 441
Mt. Dora, FL 32757

Re: UPL File No. 20003112(05)

Dear Mr. Kahn:

I spoke with you briefly several days ago. You will recall that we have opened a file because of concerns about the way your business may be providing legal services, and the manner in which attorneys are secured for customers, or customers are referred to attorneys. As I indicated, I would like to meet with you and speak to you about your business.

Please let me know whether you have an attorney with whom I can speak about the purpose and scope of this investigation, or whether I should deal directly with you. Thank you for your assistance in this regard.

Sincerely,

Barry W. Rigby
Branch Unlicensed Practice of Law Counsel

BWR/mcb

American Rights Litigators

4-18-00

Barry Rigby
The Florida Bar
Branch Unlicensed Practice of Law Counsel
1200 Edgewater Dr.
Orlando, Florida 32804

FAX: 407-841-5403

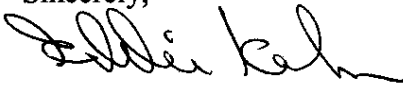
Dear Mr. Rigby,

In response to your letter of March 23, 2000, in which you state that you have "opened a file" on me and are doing an "investigation" concerning the UNLICENSED PRACTICE OF LAW, I will say this. As soon as I receive documented proof that you are authorized to make such an investigation, I will be happy to cooperate. Here are the documents that I need:

- 1) A copy of the law you say that I have possibly violated and the implementing regulation of the State Agency authorized to enforce that law.
- 2) A copy of your State ID that identifies you as an Agent of the State of Florida (Since your Florida Bar card only identifies you as being a member of a private club, that will not suffice) and the name of the State Agency you represent.
- 3) A copy of your license to practice law.
- 4) A legal document giving the definition of the "Unlicensed Practice of Law".
- 5) A copy of the Delegation of Authority that allows you to open a file on me, a private citizen, and to investigate same.

I am asking for these documents under the Sunshine Laws of the State of Florida of which all agencies of the State of Florida are subject to. Please provide me with the requested documents within 20 days from the date on this letter.

Sincerely,



Eddie Kahn

FIFTH

IN THE CIRCUIT COURT OF THE
~~NINETH~~ JUDICIAL CIRCUIT
IN AND FOR
LAKE COUNTY, FLORIDA

TFB UPL CASE NO. 20003112(05)

THE FLORIDA BAR
UPL INVESTIGATION OF

EDDIE KAHN,

Respondent.

SUBPOENA

PURSUANT TO RULE 10-6.2 RULES REGULATING THE FLORIDA BAR

THE STATE OF FLORIDA:

TO: Eddie Kahn
25525 State Road 46, Suite 1
Mount Plymouth, Florida 32776

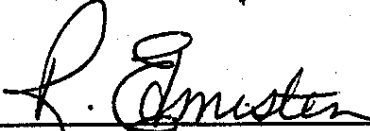
YOU ARE HEREBY COMMANDED to appear at Room 105, Lake County Courthouse, 550 West Main Street, Tavares, Florida on June ⁰⁵, 2000, at 10:00 a.m., and give testimony in the above-styled cause. This is not a trial, but your testimony is being taking for the purposes of investigation, pursuant to Rule 10-6.2, Rules Governing the Investigation and Prosecution of the Unlicensed Practice of Law (Rules Regulating The Florida Bar).

If you fail to appear as specified, and have not obtained a protective order, you may be in contempt of court. You are subpoenaed by The Florida Bar counsel whose name appears on this subpoena, and unless excused from this subpoena by that Florida Bar counsel or a court of law, you shall respond to this subpoena as directed.

DATED this 1 day of May, 2000.



THE NAME OF THE CHIEF JUDGE
WILLIAM T. SWIGERT, SR.


Deputy Clerk



THE FLORIDA BAR

1200 EDGEWATER DRIVE
ORLANDO, FL 32804-6314

LAWYER REGULATION DEPARTMENT 407/425-5424
UPL DEPARTMENT 407/425-0473

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

May 10, 2000

Eddie Kahn
American Rights Litigators
25525 State Road 46, Suite 1
Mount Plymouth, FL 32776

VIA HAND DELIVERY

Re: UPL Investigation of Eddie Kahn
File No. 20003112(05)

Dear Mr. Kahn:

This is in response to your letter of April 18, 2000, and fax of May 9. The Florida Bar is not a governmental agency subject to the Sunshine Law. Not only that, the Sunshine Law relates to government meetings being open to the public. It does not relate to requests for public information. Notwithstanding your misunderstanding of the law, I will attempt to address your questions in a reasonable fashion.

1. Section 454.23, Florida Statutes (a copy of which is enclosed), makes unlicensed practice of law a first degree misdemeanor. In addition, the way you run your business could violate various opinions of the Supreme Court of Florida relating to unlicensed practice of law. Furthermore, the manner in which attorneys accept client referrals from you could violate Florida Bar rules on such matters. I suggested earlier that you consult with one of the attorneys with whom you maintain a relationship. Please do so, as they should be able to provide further guidance on possible problems with your business.

2. I have no "State ID" and I do not know what you mean by "Agent of the State of Florida." You may recall that there are three branches of government: the executive (such as the Governor); the legislative (the House and Senate); and the judicial (the courts). The Florida Bar is part of the judicial branch of government, and we have legal authority to proceed with this investigation.

3. I do not have "a copy" of a license to practice law. My Florida Bar Number is 613770. You may call The Florida Bar Membership Records Department in Tallahassee if you would like any additional information about me.

4. There is no single legal document which defines unlicensed practice of law. It is

Eddie Kahn
May 10, 2000
Page -2-

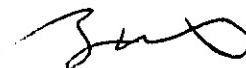
defined by statute, rules, and case law.

5. Please see number 2 above. I am also enclosing a copy of Rule 10-6.1 and 10-6.2, Rules Governing the Investigation and Prosecution of the Unlicensed Practice of Law. Under these rules, I am empowered to subpoena you and take your testimony.

I understand that you make your living by questioning government authority. I wouldn't expect you to do otherwise in this case, and I won't hold that against you. On the other hand, I consider it underhanded for you to fax me a letter questioning my responsiveness when you are aware that my process server has been attempting to serve you for several days. Had you accepted service, you would have received a prior version of this letter several days ago.

I have scheduled taking your testimony for June 5, 2000, at 10:00 at the Lake County Courthouse. An informal meeting with you will not be sufficient at this point. A copy of the subpoena is enclosed. You will be served before that date. I have given you ample notice to obtain an attorney and attempt to get a protective order, if you do not wish to appear to provide testimony to me. If you do not do so, I will expect to see you on June 5 at 10:00.

Sincerely,



Barry W. Rigby
Branch Unlicensed Practice of Law Counsel

BWR/mcb

enclosures

**In the District Court of the United States
Middle District of Florida, Orlando Division**

**Eddie Kahn,
25525 SR 46, Suite 2
Mount Plymouth, Florida 32776**

Case No:

plaintiff,

Jury trial required

vs.

**Barry W. Rigby
1200 Edgewater Drive
Orlando, Florida 32804**

and

**Mary Ellen Bateman
650 Apalachee Parkway,
Tallahassee, Florida 32399-2300**

and

in their individual and personal capacity,

and

**The State of Florida,
Serve: Bob Butterworth, Attorney General
The Capitol
Tallahassee, Florida 32399-1050**

and

**The Florida Bar Association,
Serve: John S. Harkness, Executive Director
650 Apalachee Parkway,
Tallahassee, Florida 32399-2300**

jointly and severally for declaratory relief,

defendants.

00 JUN - 2 PM 2:48
CLERK, U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO, FLORIDA

RECEIVED



THE FLORIDA BAR

1200 EDGEWATER DRIVE
ORLANDO, FL 32804-6314

March 1, 2000

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

407/425-5424

Roy F. Adams, Sr and Janice M. Adams
977 SW 114th Terrace
Davie, FL 33325

RE: Your Complaint Concerning Joseph John Brune, III
Case No. 2000-30.292 (19A)

Dear Mr. and Ms. Adams:

This is to advise you that on the basis of a diligent and impartial analysis of all of the information available as of this date, The Florida Bar has found no probable basis for further inquiry.

Mr. and Mrs. Adams you complained that Mr. Brune, who was employed by American Rights Litigators, received a letter on your behalf, from the U.S. Department of Justice, dated January 8, 1998. You also allege that he failed to notify you of his receipt of that letter. Mr. Brune provided a written response in which he explained that after October 16, 1997, he was no longer associated with American Rights Litigators and never saw the January 8, 1998 letter. Mr. Brune was advised by American Rights Litigators that a new attorney was taking over all the cases he was previously assigned to. We have spoke with Mr. Kahn, the manager of American Rights Litigators, who confirmed that after October 1997, Mr. Brune was no longer associated with their organization and that the letter was received by them but not forwarded to Mr. Brune. Although, we understand your frustration with this matter, we have insufficient evidence to prove Mr. Brune engaged in unethical conduct. Therefore, this case is now closed.

Because the Bar only has the authority to address questions of ethics, the Bar could not address any legal issue about which you may feel concerned. If you have any further questions about this ethical matter or any concerns about any legal issues, please consult with legal counsel of your choice.

This complaint will be purged from the discipline records and the file destroyed one year from the date of this letter.

Please be advised of our interest in the matter which you presented to The Florida Bar.

Sincerely yours,

Jan K. Wichrowski
Branch Staff Counsel

JKW ab

cc: Joseph John Brune, III