

# **EXHIBIT F**

IN THE SUPREME COURT OF FLORIDA

THE FLORIDA BAR,

Petitioner,

Case No.

TFB File No. 2008-90,111(OSC)

v.

LAURA L. HESS,

Respondent.

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**PETITION FOR CONTEMPT  
AND ORDER TO SHOW CAUSE**

THE FLORIDA BAR, files this, its Petition for Contempt and Order to Show Cause and request for a 91-day suspension against respondent, Laura L. Hess, and says:

1. In Florida Supreme Court Case No. SC04-1498, by order dated January 27, 2005, respondent received a public reprimand and was placed on probation for 3 years.
2. Respondent's probation was scheduled to end on January 27, 2008.
3. Respondent has had 8 new complaints filed with The Florida Bar during her probationary period which resulted in a finding of probable cause for misconduct committed during the probationary period by the grievance committee. See, January 15, 2008 Amended Notice of Finding of Probable Cause for Further Disciplinary Proceedings and Record of Investigation filed in The Florida Bar File Nos. 2007-50,983(17H) attached hereto as Exhibit "A."

FILED  
SAW

4. Rule 3-5.1(c), Rules Regulating The Florida Bar, provides in pertinent part:

Failure to observe the conditions of probation or a finding of probable cause as to conduct of the respondent committed during the period of probation shall terminate the probation. In such event, even though such finding of probable cause shall be made after the expiration of the period of probation, the judgment shall be reconsidered and an appropriate judgment shall be entered. On termination of probation for failure to observe the conditions of probation or on a finding of probable cause for misconduct committed during the period of probation, the attorney may be punished for contempt or suspended from the practice of law on petition by The Florida Bar, and any such suspension shall continue until the respondent may be reinstated to the practice of law as provided elsewhere in these rules.

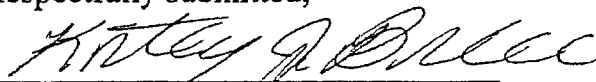
5. Thus, pursuant to Rule 3-5.1(c), The Florida Bar requests that respondent receive a 91-day suspension, so that she is required to demonstrate rehabilitation in reinstatement proceedings as a prerequisite to returning to the practice of law.

6. Due to a finding of probable cause for misconduct which occurred during the probationary period, The Florida Bar was obligated to file this Petition for Contempt.

7. The other members of The Florida Bar should not have to pay for respondent's misconduct which occurred during her probationary period resulting in the instant proceeding. Therefore, pursuant to Rule 3-7.6(q)(1)(I), Rules Regulating The Florida Bar, the Bar is requesting administrative costs of \$1,250.00 against respondent.

WHEREFORE, petitioner, The Florida Bar, respectfully requests this court enter its order suspending respondent Laura L. Hess, from the practice of law for ninety-one (91) days and assessing costs in the amount of \$1,250.00 to The Florida Bar.


Respectfully submitted,



Kathy Jane Bible  
The Florida Bar  
651 East Jefferson Street  
Tallahassee, Florida 32399-2300  
(850) 561-5823  
Florida Bar No. 654019

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition for Contempt and Order to Show Cause has been forwarded by Certified Mail Return Receipt Number 7003 1680 0002 4612 1159 to Respondent's Counsel, Kevin P. Tynan, in TFB File Nos. 2007-50,983(17H), et al., at his record bar address of Richardson & Tynan, P.L.C., 8142 North University Drive, Tamarac, Florida 33321-1708, and by Certified Mail Return Receipt Number 7003 1680 0002 4612 1166 to Respondent's Counsel, Charles Wender, in TFB File No. 2004-50,991(17H), at his record bar address of 190 West Palmetto Park Road, Boca Raton, Florida, 33432-3828 and by regular U.S. Mail to Juan Carlos Arias, Bar Counsel, 5900 North Andrews Avenue, Suite 900, Fort Lauderdale, Florida, 33309 on this 17<sup>th</sup> day of February, 2008.



Kathy Jane Bible

IN THE SUPREME COURT OF FLORIDA  
(Before a Grievance Committee)

THE FLORIDA BAR,

Complainant,

v.

LAURA L. HESS

Respondent.

The Florida Bar File Nos.

2007-50,983(17H),

2007-51,816(17H),

2007-51,797(17H),

2007-51,632(17H),

2007-51,482(17H),

2007-51,866(17H),

2007-51,340(17H),

2008-50,264(17H)

**AMENDED NOTICE OF FINDING OF PROBABLE CAUSE**  
**FOR FURTHER DISCIPLINARY PROCEEDINGS**  
**AND RECORD OF INVESTIGATION**

TO: Laura L. Hess  
c/o Kevin P. Tynan, Esq.  
Richardson & Tynan, P.L.C.  
8142 North University Drive  
Tamarac, Florida 33321

You are hereby notified that Seventeenth Judicial Circuit Grievance Committee "H," at a duly constituted meeting on the 15<sup>th</sup> day of January, 2008, and by majority vote of eligible members present, found probable cause for your violations of the following Rules:

R. Regulating Fla. Bar 3-4.2, 3-4.3, 4-1.3, 4-1.4(a), 4-1.4(b), 4-1.15, 4-7.2(a)(2), 4.5.5(a), 4-8.1(a), 4-8.4(a), 4-8.4(c), 4-8.4(d) and 5-1(a)(1)

All matters of record considered by the grievance committee have been referred to the undersigned staff lawyer for the drafting and filing of a formal Complaint pursuant to Rule 3-7.4(l).

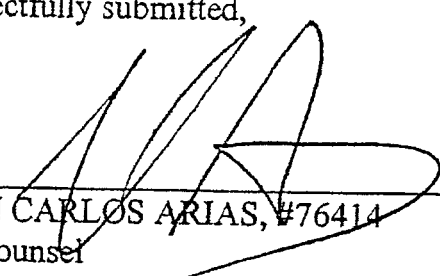
Your further attention is called to Rule 3-7.9.



Please note that plea negotiations for consent judgments may be entered into until two weeks before the final hearing. After that date, bar policy prohibits further negotiations.

Dated this 23rd day of January, 2008.

Respectfully submitted,



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JUAN CARLOS ARIAS, #76414

Bar Counsel

The Florida Bar

5900 North Andrews Avenue, Suite 900

Fort Lauderdale, Florida 33309

(954) 772-2245

cc: Staff Counsel  
The Florida Bar  
651 East Jefferson Street  
Tallahassee, Florida 32399-2300

Johanna S. Shields, Chair  
Seventeenth Judicial Circuit  
Grievance Committee "H"  
Klauber, Hurtig, Shields  
8751 West Broward Boulevard, Suite 410  
Plantation, Florida 33324

Eugene Keith Pettis, Esq.  
Designated Reviewer  
Haliczer, Pettis & Schwamm  
One Financial Plaza, 7<sup>th</sup> Floor  
Fort Lauderdale, Florida 33394