

THE FLORIDA BAR
Unlicensed Practice of Law
Complaint Form

There is a requirement for you to execute the oath at the end of this form. False statements made in bad faith or with malice may subject you to civil or criminal liability. A copy of your complaint may be sent to the nonlawyer during the course of the investigation. Additionally, if the nonlawyer asks who complained, your name will be provided. Further information may be found in the pamphlet "Filing an Unlicensed Practice of Law Complaint."

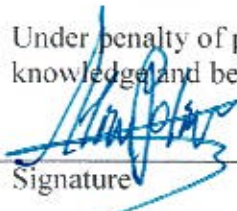
Your
Name: Kimberly Poling
Address: 3432 N.E. 15t Ave.
City: Oakland Park
State & Zip: FL 33334
Telephone: 561-573-7008
Email: kimberlypoling29@yahoo.com

Nonlawyer's
Name: Ankur Mehta
Address: 1616 SE 2nd Ct.
City: Ft. Lauderdale
State & Zip: FL 33301
Telephone: 904-612-3757 / 904-273-5634
Email: ankur@howardjustice.com

Describe your complaint and attach a copy of relevant documents. Please limit complaint and attachments to 25 pages. See mailing instructions on second page.

See Complaint with Exhibits attached

Under penalty of perjury, I declare that I have read the foregoing document and that to the best of my knowledge and belief the facts stated in it are true.

Signature 

Date 2/15/18

*****SEE MAILING INSTRUCTIONS ON SECOND PAGE*****

**COMPLAINT AGAINST ANKUR
MEHTA TO THE UPL
DEPARTMENT OF THE
FLORIDA BAR**

My name is Kimberly Poling. I write to file a complaint against non-lawyer Ankur Mehta for the unlicensed practice of law. This complaint relates to two pending complaints filed with the Florida Bar, Case Nos.: 18-7379 and 18-9536, which the Bar is currently investigating.

At all times relevant, Mr. Mehta acted as the consigliere for attorney Tim Howard, Ph.D., Bar no. 655325, owner of the law firm Howard & Associates ("H&A").

H&A has or had three offices, 3522 Thomasville Road, Ste. 500, Tallahassee, FL 32309; 101 NE Third Ave., Ste. 1500, Fort Lauderdale, Florida 33301; and Riverplace Tower, Suite 2101, 1301 Riverplace Blvd., Jacksonville, FL 32207. I worked for H&A in its Ft. Lauderdale office as a Legal Assistant from March 1, 2017 to December 8, 2017. H&A's main office is in Tallahassee.

By way of background, Mr. Mehta has a lengthy arrest record for violating numerous criminal statutes

across the state of Florida. These violations range from Criminal Mischief; Trespass Other Than Structure or Conveyance; and Disorderly Intoxication; to Leaving the Scene of an Accident; and Violations to Restrictions Placed on his Driver's License. (See Case Nos.: FLMONROE279331; FLDUVAL779270-1; FLDUVAL779 2 70-2; FLAALACH UA14 8 7 3 9 - 1; and 0112001TC002269A).

Mr. Mehta's blatant disregard for the law did not stop him from wanting to pursue a career in the law. After graduating Florida Coastal Law School in Jacksonville, FL, Mr. Mehta sat for the Bar exam and thereafter applied for admission to the Florida Bar, either while the results were pending, or after passing the test. Either way, the Florida Bar rejected his application based on his lengthy rap sheet.

Failing to gain admission to the Florida Bar, Mr. Mehta then applied to become a member of the North Carolina Bar. Discovering his criminal past in Florida, the North Carolina Bar also rejected his application for admission. Mr. Mehta, however, would not take no for an answer and began to practice law without a license under the auspices of Dr. Howard.

Everyone employed by H&A is or was treated as an independent contractor and paid through an alter ego of H&A titled, Mehta Consulting, LLC, a Florida Limited Liability Corporation, CC2595400110. (See 2017 Annual Report attached as Exhibit "A"). Mr. Mehta is the Manager of Mehta Consulting.

Personally, I believe Mehta Consulting was established as an attempt to shield Dr. Howard and H&A from the illegal and unethical conduct described below. Although Dr. Howard is not listed as an officer of Mehta Consulting, payroll and other checks issued by Mr. Mehta Consulting, Regions Bank account no. 0213650653, are signed by, or stamped with, Dr. Howard's name. Mr. Mehta also signs checks issued on Mehta Consulting's operating account.

USING IOTTA FUNDS TO COVER OPERATING EXPENSES

Multiple times throughout my employment, I witnessed Mr. Mehta, with the knowledge and consent of Dr. Howard, instruct me and my former colleague, Legal Assistant Surya Cherian, to transfer funds from H&A's IOTA Trust Account,

to either Mehta Consulting's account, or to H&A's operating account to cover operating expenses, which the Bar is currently investigating.

Having no legal background -- I am in the process of obtaining my MBA from the University of Miami -- the excuses I heard from Ms. Cherian and Mr. Mehta as to why IOTA Trust Fund were being used to cover operating expenses initially sounded legitimate.

After I became aware that IOTA Trust Funds were not to be used for operating expenses under any circumstances, I began to see that these transactions were done to cover H&A's payroll and other operating expenses. Again, this was done with Dr. Howard's knowledge and approval.

MR. MEHTA SOLICITED POTENTIAL CLIENTS

Mr. Mehta instructed me and Ms. Cherian to cold call individuals who are on a "Do Not Call" list. He often requested public requests searches from a Victoria Phillips. Her email is Victoria Phillips@freshfromflorida.com.

Mr. Mehta would request a list of people who had made complaints about unauthorized phone solicitations. Then he would order me and Ms. Cherian to call these same individuals. We were instructed to tell them that their rights had been violated by the unauthorized phone solicitations. Then, we would attempt to sign them up as clients, who would act as plaintiffs in a class action lawsuit against solicitors who had violated the Do Not Call list.

If a "good" client was hard to sign up, we were instructed to give Mr. Mehta their information, after which he would call the prospective client. Mr. Mehta instructed us, that if someone was interested in becoming a plaintiff, to notify him, to sign them up as a client of the firm, then to prepare a draft lawsuit on their behalf.

During my employment, I witnessed Mr. Mehta solely handle all negotiations and settlement offers for lawsuits of this type. An attorney that I worked with closely informed me that cold-calling individuals and attempting to solicit them as clients of the firm was illegal and

unethical. This attorney also informed me that he would never engage in this activity, even if he was requested to, since it was highly illegal.

MR. MEHTA HOLDS HIMSELF OUT AS A LAWYER

As mentioned above, Mr. Mehta graduated from Florida Coastal University in Jacksonville, FL. He uses "J.D." after his name. His title with H&A is "Director of Litigation," which he disseminates far and wide by using the internet and other forms of communications. (See Exhibit "B" attached hereto.)

At the beginning of my employment with H&A I witnessed Mr. Mehta engage in settlement discussions; make deals on behalf of clients; email members of law firms that he negotiated and closed deals with on behalf of clients; communicate directly with clients regarding legal matters; dispense legal advice and draft settlement agreements.

Again, a trusted attorney friend of mine brought to my attention the fact that Mr. Mehta should not be engaging in any of these activities, since he is not a

licensed attorney, and that this too violated Bar Rules.

From what I saw, Mr. Mehta was the main principal at H&A handling settlements for the firm. He was directly engaged in all settlements for BP Oil Spill cases, TCPA cases, and Misbranding Suits.

I also know that Mr. Mehta is listed as an attorney in the cases of, *Ira Reynolds, et al. v. Wal-Mart Stores, Inc.*, Case No.: 4:14-cv-00381-WS-CAS (U.S.D.C., Northern Dist. FL) (See *Joint Status Report* attached as Exhibit "C").

Moreover, Mr. Mehta made an appearance on the record during a deposition that he was representing H&A's client, Richard Harris, in the case of *Harris, et al. v. R.J. Reynolds Tobacco Company, et al.*, Case No.: 2014-CA-000337 (Gadsden Co., FL) (See deposition of Richard Harris Vol. 1, pp. 1-2 attached as Exhibit "D").

**FAILURE TO PAY EMPLOYEES ON TIME
AND FAILURE TO ISSUE TO ME MY FINAL PAYCHECK**

Throughout my employment, H&A continuously failed to make payroll on time. Starting in June 2017 to December 2017, Mr. Mehta and Dr. Howard came up with countless excuses regarding why funds are not available

for payroll.

After I voluntarily left the firm, I asked Mr. Mehta for my final paycheck on the day it was due. He sent multiple, harassing text messages to me, mocking, disparaging and insulting me. Since then, I requested to be paid for my final two weeks of work and he responded with comments like, "Really? Today is payday? Huh? Go figure. Well good for you." And it gets even nastier from there. (See complete text attached hereto as Exhibit "E").

After months of waiting I finally received my \$1,200 in back pay after I informed Dr. Howard that I had filed a Bar Complaint against he and Mr. Mehta.

This concludes my complaint against Mr. Mehta for the Unlicensed Practice of Law.

EXHIBIT "A"

2017 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT

DOCUMENT# L16000088206

Entity Name: MEHTA CONSULTING, LLC

Current Principal Place of Business:

1616 SE 2ND COURT
FORT LAUDERDALE, FL 33301

Current Mailing Address:

1616 SE 2ND COURT
FORT LAUDERDALE, FL 33301 US

FEI Number: 81-2513446

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

MEHTA, ANKUR
1616 SE 2ND CT
FT. LAUDERDALE, FL 33301 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title MGR
Name MEHTA, ANKUR
Address 1616 SE 2ND CT
City-State-Zip: FT. LAUDERDALE FL 33301

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: ANKUR MEHTA

MGMR

04/25/2017

Electronic Signature of Signing Authorized Person(s) Detail

Date

EXHIBIT “B”



J.B. Harris <jbharrisesq@gmail.com>

(no subject)

1 message


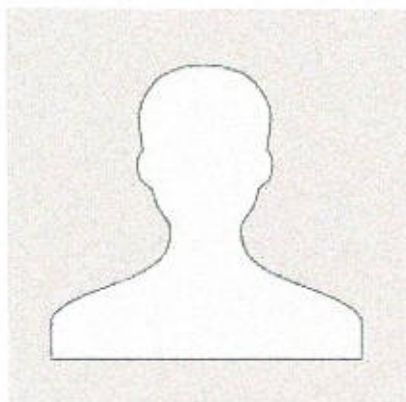
J.B. Harris <jbharrisesq@gmail.com>

Thu, Feb 15, 2018 at 7:20 PM

To: "J. B. Harris" <jbharrisesq@gmail.com>

Verizon LTE

11:37 AM

92%  Back**Ankur T
Mehta**

37 Years Old

1616 SE 2nd CT Fort Lauderdale...

(904) 273-5634

 CALL SEND SMS**1** Work

Title: Director of Litigation Division

Works at: Howard & Associates P.A

Since: 2010

**8**

Address History

EXHIBIT “C”

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION
Case No. 4:14-cv-00381-WS-CAS

IRA REYNOLDS and PATRICIA BELL,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

WAL-MART STORES, INC.,

Defendant.

JOINT STATUS REPORT

Plaintiffs IRA REYNOLDS and PATRICIA BELL, and Defendant WAL-MART STORES, INC. respectfully submit this Status Report, in compliance with the Court's Order dated December 4, 2015, and states as follows:

The parties have reached a settlement in principle, agreed to a document memorializing the settlement, and are simply awaiting finalization of an exhibit (a label exemplar) to the document. The parties anticipate execution of the agreement within the next several days.

Respectfully submitted,

/s/ P. Tim Howard

Tim Howard, J.D., Ph.D.

Ankur Mehta, Esq.

Howard & Associates, P.A.

2120 Killarney Way, Suite 125

Tallahassee, FL 32309

Phone 850-298-4455

Fax 850-216-2537

tim@howardjustice.com

/s/ John K. Londot

John K. Londot, Esq.

Florida Bar Number 579521

Greenberg Traurig, P.A.

101 East College Avenue

Tallahassee, FL 32301

Telephone (850) 222-6891

Facsimile (850) 681-0207

londotj@gtlaw.com

hoffmanm@gtlaw.com

Louis M. Bograd, Esq.
Center for Constitutional Litigation, P.C.
777 6th Street, N.W., Suite 520
Washington, DC 20001
Telephone: (202) 944-2860
Fax: (202) 965-0920
louis.bograd@cclfirm.com
Attorney for Plaintiffs

David E. Sellinger
Greenberg Traurig LLP
200 Park Avenue
Florham Park, N.J.
Phone 973-360-7925
Fax 973-301-8410
*Attorneys for Defendant
Wal-Mart Stores, Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 9, 2015, the foregoing document was electronically filed with the Clerk of Court using CM/ECF, which will serve the following counsel of record:

Tim Howard, J.D., Ph.D.
Howard & Associates, P.A.
2120 Killarney Way, Suite 125
Tallahassee, FL 32309
Phone 850-298-4455
Fax 850-216-2537
tim@howardjustice.com
Attorney for Plaintiffs

Louis M. Bograd
Center for Constitutional Litigation, P.C.
777 6th Street, N.W., Suite 520
Washington, DC 20001
Telephone: (202) 944-2860
Fax: (202) 965-0920
louis.bograd@cclfirm.com
Attorney for Plaintiffs

s/John Londot
JOHN LONDOT

EXHIBIT “D”

IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT
IN AND FOR GADSDEN COUNTY, FLORIDA

RICHARD HARRIS and MARGARET
HARRIS, his wife,

Plaintiffs,

vs.

CASE NO.: 2014-CA-000337

R.J. REYNOLDS TOBACCO COMPANY,
individually and as successor by
merger to BROWN & WILLIAMSON TOBACCO
CORPORATION, individually and a
successor by merger to AMERICAN
TOBACCO COMPANY, a foreign
corporation; PHILIP MORRIS-USA, INC.,
a foreign corporation; LORILLARD
TOBACCO COMPANY a foreign corporation,
Defendants.

VOLUME 1

VIDEOTAPED DEPOSITION OF: RICHARD PAGE HARRIS

TAKEN AT THE INSTANCE OF: The Defendant R.J. Reynolds
Tobacco Company

DATE: June 20, 2016

TIME: Commenced at 1:40 p.m.
Adjourned at 4:02 p.m.

LOCATION: 708 NE 2nd Street
Havana, Florida

REPORTED BY: JO LANGSTON
Registered Professional
Reporter

Page 2	
1	APPEARANCES:
2	REPRESENTING THE PLAINTIFFS:
3	JAAKAN WILLIAMS, ESQUIRE
4	ANKUR MEHTA, ESQUIRE
5	Howard & Associates
6	2120 Killarney Way, Suite 125
7	Tallahassee, FL 32309
8	850-298-4455
9	ankur@howardjustice.com
10	jaakan@howardjustice.com
11	REPRESENTING THE DEFENDANT R.J. REYNOLDS:
12	EMILY BAKER, ESQUIRE
13	Jones Day
14	1420 Peachtree Street, N.E.
15	Suite 800
16	Atlanta, GA 30309
17	404-581-3939
18	ecbaker@jonesday.com
19	REPRESENTING THE DEFENDANT PHILIP MORRIS:
20	CHRISTOPHER P. NEASE, ESQUIRE
21	Shook, Hardy & Bacon, LLP
22	2555 Grand Boulevard
23	Kansas City, MO 64108
24	cnease@shb.com
25	ALSO PRESENT:
	MICHAEL McLAUGHLIN, ESQ.
	MARGARET HARRIS
	VIDEOGRAPHER: CHRISTOPHER GREEN

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1	PROCEEDINGS
2	The following deposition was taken on oral
3	examination, pursuant to notice, for purposes of discovery,
4	for use as evidence, and for such other uses and purposes as
5	may be permitted by the applicable and governing rules.
6	Reading and signing of the deposition transcript by the
7	witness is not waived.
8	* * *
9	VIDEOGRAPHER: All right. Ladies and gentlemen,
10	we are now on the record. This is the videotaped
11	deposition of Richard Harris, taken in Mr. Harris's
12	home in Havana, Florida. Today is June 20th, 2016, at
13	1:40 p.m. This is case number 2014-CA-000337, styled
14	Richard Harris and Margaret Harris, his wife, versus
15	R.J. Reynolds Tobacco Company, individually, and
16	successor by merger to Brown & Williamson Tobacco
17	Corporation, et al., filed in the Second Judicial
18	Circuit in and for Gadsden County, Florida.
19	The court reporter Jo Langston, and the
20	videographer is Christopher Green. And we have a
21	number of people here. So can I have counsel identify
22	themselves for the record?
23	MR. WILLIAMS: Jaakan Williams for the plaintiffs,
24	Richard and Margaret Harris, on behalf of Howard &
25	Associates.

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1	MR. MEHTA: Ankur Mehta, with Howard & Associates,
2	on behalf of Richard and Margaret Harris.
3	MS. BAKER: Emily Baker from Jones Day on behalf
4	of R.J. Reynolds Tobacco Company.
5	MR. NEASE: Christopher Nease from Shook, Hardy &
6	Bacon on behalf of Philip Morris-USA.
7	VIDEOGRAPHER: And could I have the court reporter
8	please swear in the witness.
9	THE COURT REPORTER: Can you raise your right
10	hand?
11	Do you swear or affirm the testimony you're about
12	to give will be the truth, the whole truth, and nothing
13	but the truth?
14	THE WITNESS: To the best of my ability.
15	VIDEOGRAPHER: Thank you, ladies and gentlemen.
16	WHEREUPON,
17	RICHARD HARRIS
18	was called as a witness and, having been first duly sworn,
19	was examined and testified as follows:
20	DIRECT EXAMINATION
21	BY MS. BAKER:
22	Q Good afternoon, Mr. Harris. Are you able to hear
23	me okay?
24	A Yeah. I've got my hearing aid. I can hear you
25	pretty good.

EXHIBIT “E”



J.B. Harris <jbharrisesq@gmail.com>

(no subject)

1 message

J.B. Harris <jbharrisesq@gmail.com>

To: "J. B. Harris" <jbharrisesq@gmail.com>

Thu, Feb

AT&T

6:34 PM



Ankur

Please let me know when you send
paycheck. Today is payday

Today 5:25 PM

Really? Today is payday? Huh? Go
figure. Well good for you!
M

I'm just attempting to clarify when
you will be sending my check. No
need for such unnecessary hatred
and sarcasm

Deliv

Today 6:31 PM

Just direct your questions to someone else. You are just a manipulative shit, and I have no respect whatsoever for you. I should have let you walk away that first day, or the time after that, or after that! I believed in your integrity, and you clearly demonstrated that you have none.

