THE FLORIDA BAR

651 EAST JEFFERSON STREET
TALLAHASSEE, FL 32399-2300

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

850/561-5600
WWW.FLORIDABAR.ORG

August 26, 2009

Ms. Kim Lowry Picazio
Law Office of Kim L Picazio P A
100 SE 3rd Ave Ste 2500
Fort Lauderdale, FL 33394-0002

Re: Crystal Sheffield; The Florida Bar File No. 2010-50,286 (17I)

Dear Ms. Picazio:

Enclosed is a copy of an inquiry/complaint and any supporting documents submitted by the above referenced complainant(s). Your response to this complaint is required under the provisions of Rule 4-8.4(g), Rules of Professional Conduct of the Rules Regulating The Florida Bar, and is due in our office by **September 11, 2009**. Responses should not exceed 25 pages and may refer to any additional documents or exhibits that are available on request. Failure to provide a written response to this complaint is in itself a violation of Rule 4-8.4(g). You are **further requested to furnish the complainant with a complete copy of your written response, including any documents submitted therewith.**

Please note that pursuant to Rule 3-7.1(b), Rules of Discipline, any reports, correspondence, papers, recordings and/or transcripts of hearings received from either you or the complainant(s) shall become a part of the public record in this matter and thus accessible to the public upon a disposition of this file. Pursuant to Rule 3-7.1(f), Rules of Discipline, you are further required to complete and return the enclosed Certificate of Disclosure form.

If either you or the complainant(s) believe any material provided to The Florida Bar is confidential under applicable law, undersigned counsel should be advised of that fact so that measures can be taken to seal that portion of the file. It should be noted that The Florida Bar is required to acknowledge the status of proceedings during the pendency of an investigation, if a specific inquiry is made and the matter is deemed to be in the public domain.

Finally, the filing of this complaint does not preclude communication between the attorney and the complainant(s). Please review the enclosed Notice for information on submitting your response.

Sincerely,

Shanell M. Schuyler, Bar Counsel
Attorney Consumer Assistance Program
ACAP Hotline 866-352-0707
Enclosures (Certificate of Disclosure, Notice of Grievance Procedures, Copy of Complaint, Notice - Mailing Instructions)

cc: Crystal Sheffield

Pursuant to Rule 3-7.1(f), Rules of Discipline, you must execute the appropriate disclosure paragraph below and return the form to this office by **September 11, 2009**. The rule provides that the nature of the charges be stated in the notice to your firm; however, we suggest that you attach a copy of the complaint.

CERTIFICATE OF DISCLOSURE

I HEREBY CERTIFY that on this _____ day of _____, 200___, a true copy of the foregoing disclosure was furnished to _____, a member of my present law firm of _____, and, if different, to _____, a member of the law firm of _____, with which I was associated at the time of the act(s) giving rise to the complaint in The Florida Bar File No. 2010-50,286 (17I).

_____
Kim Lowry Picazio

CERTIFICATE OF DISCLOSURE
(Corporate/Government Employment)

I HEREBY CERTIFY that on this _____ day of _____, 200___, a true copy of the foregoing disclosure was furnished to _____, my supervisor at _____ (name of agency), with which I was associated at the time of the act(s) giving rise to the complaint in The Florida Bar File No. 2010-50,286 (17I).

_____
Kim Lowry Picazio

CERTIFICATE OF NON-LAW FIRM AFFILIATION
(Sole Practitioner)

I HEREBY CERTIFY to The Florida Bar on this _____ day of _____, 200___, that I am not presently affiliated with a law firm and was not affiliated with a law firm at the time of the act(s) giving rise to the complaint in The Florida Bar File No. 2010-50,286 (17I).

_____
Kim Lowry Picazio

NOTICE OF GRIEVANCE PROCEDURES

1. The enclosed letter is an informal inquiry. Your response is required under the provisions of The Rules Regulating The Florida Bar 4-8.4(g), Rules of Professional Conduct. Failure to provide a written response to this complaint is in itself a violation of Rule 4-8.4(g). If you do not respond, the matter will be forwarded to the grievance committee for disposition in accordance with Rule 3-7.3 of the Rules of Discipline.

2. Many complaints considered first by staff counsel are not forwarded to a grievance committee, as they do not involve violations of the Rules of Professional Conduct justifying disciplinary action.

3. "Pursuant to Rule 3-7.1(a), Rules of Discipline, any response by you in these proceedings shall become part of the public record of this matter and thereby become accessible to the public upon the closure of the case by Bar counsel or upon a finding of no probable cause, probable cause, minor misconduct, or recommendation of diversion. Disclosure during the pendency of an investigation may be made only as to status if a specific inquiry concerning this case is made and if this matter is generally known to be in the public domain."

4. The grievance committee is the Bar's "grand jury." Its function and procedure are set forth in Rule 3-7.4. Proceedings before the grievance committee, for the most part, are non-adversarial in nature. However, you should carefully review Chapter 3 of the Rules Regulating The Florida Bar.

5. If the grievance committee finds probable cause, formal adversarial proceedings, which ordinarily lead to disposition by the Supreme Court of Florida, will be commenced under 3-7.6, unless a plea is submitted under Rule 3-7.9

THE FLORIDA BAR
651 EAST JEFFERSON STREET
TALLAHASSEE, FL 32399-2300

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

850/561-5600
WWW.FLORIDABAR.ORG

August 26, 2009

Ms. Crystal Sheffield
12222 Mud Lake Rd
Glen St. Mary, FL 32040

Re: Kim Lowry Picazio; The Florida Bar File No. 2010-50,286 (17I)

Dear Ms. Sheffield:

Enclosed is a copy of our letter to Ms. Picazio which requires a response to your complaint.

Once you receive Ms. Picazio's response, you have 10 days to file a rebuttal if you so desire. If you decide to file a rebuttal, please send a copy to Ms. Picazio. Rebuttals should not exceed 25 pages and may refer to any additional documents or exhibits that are available on request. Please address any and all correspondence to me. Please note that any correspondence must be sent through the U.S. mail; we cannot accept faxed material.

Please be advised that as an arm of the Supreme Court of Florida, The Florida Bar can investigate allegations of misconduct against attorneys, and where appropriate, request that the attorney be disciplined. The Florida Bar cannot render legal advice nor can The Florida Bar represent individuals or intervene on their behalf in any civil or criminal matter.

Please review the enclosed Notice on mailing instructions for information on submitting your rebuttal.

Sincerely,

Shanell M. Schuyler, Bar Counsel
Attorney Consumer Assistance Program
ACAP Hotline 866-352-0707

Enclosures (Notice of Grievance Procedures, Copy of Letter to Ms. Picazio; Notice - Mailing Instructions)

cc: Ms. Kim Lowry Picazio

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LAW OFFICE OF
KIM L. PICAZIO, P.A.
ATTORNEY AT LAW

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KIM L. PICAZIO
FAMILY AND MATRIMONIAL LAW
COMMERCIAL LITIGATIOIN
GENERAL CIVIL PRACTICE

THE FLORIDA BAR
RECEIVED
SEP 14 2009
ACAP
TALLAHASSEE, FLORIDA

September 11, 2009

Via Federal Express Delivery

Shanell M. Schuyler, Bar Counsel
The Florida Bar
651 East Jefferson Street
Tallahassee, FL 32399-2300

Re: Crystal Sheffield: The Florida Bar No.: 2010-50, 286 (17I)

Dear Ms. Schuyler:

On Friday, September 11, 2009, I submitted my Response to the above-styled bar complaint. I do not believe my office provided the Certificate of Disclosure required by Rule 3-7.1(f). Enclosed please find a copy of such disclosure to add to this file.

Thank you for your attention in this regard.

Very truly yours,

KIM L. PICAZIO

Pursuant to Rule 3-7.1(f), Rules of Discipline, you must execute the appropriate disclosure paragraph below and return the form to this office by **September 11, 2009.** The rule provides that the nature of the charges be stated in the notice to your firm; however, we suggest that you attach a copy of the complaint.

CERTIFICATE OF DISCLOSURE

I HEREBY CERTIFY that on this _____ day of _____, 200___, a true copy of the foregoing disclosure was furnished to _____, a member of my present law firm of _____, and, if different, to _____, a member of the law firm of _____, with which I was associated at the time of the act(s) giving rise to the complaint in The Florida Bar File No. 2010-50,286 (17I).

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Kim Lowry Picazio

CERTIFICATE OF DISCLOSURE
(Corporate/Government Employment)

I HEREBY CERTIFY that on this _____ day of _____, 200___, a true copy of the foregoing disclosure was furnished to _____, my supervisor at _____ (name of agency), with which I was associated at the time of the act(s) giving rise to the complaint in The Florida Bar File No. 2010-50,286 (17I).

_____
Kim Lowry Picazio

CERTIFICATE OF NON-LAW FIRM AFFILIATION
(Sole Practitioner)

I HEREBY CERTIFY to The Florida Bar on this 9th day of September, 2009, that I am not presently affiliated with a law firm and was not affiliated with a law firm at the time of the act(s) giving rise to the complaint in The Florida Bar File No. 2010-50,286 (17I).

_____
Kim Lowry Picazio

RESPONSE TO CRYSTAL SHEFFIELD: THE FLORIDA BAR
FILE NO.: 2010-50, 286 (171I)

When I received this complaint to the Florida Bar by Crystal Sheffield, I was extremely saddened, and staggered by the allegations. I have been an upstanding member of the Florida Bar for fourteen (14) years, and have never been subject to any disciplinary action in my entire career. I presently serve as an active member of the Florida Bar's Family Law Section's Support Committee and Litigation Support Committee. I have always accepted complicated pro bono cases through Legal Aid Service of Broward County, Dade County Legal Aid Society, Put Something Back Program, judicially appointed Guardian Ad Litem assignments, and private cases I feel strongly about. I am a mother of three (3) young children, and when I was asked to represent another Mom who had just lost her five (5) year old daughter to an alleged abductor, I felt compelled to accept her case.

I was confronted with many difficult choices in this high-media case, which literally consumed my law practice, my family life, and my energy. Initially, I embarked on the Sheffield case with a fierce determination to right the wrongs of this mourning mother's life, and history of abuse. However, as an attorney, I was bound by the Rules of the Bar, and was constantly confronted with situations that do not regularly occur in my customary family law cases. And many times, such as the one under consideration here, clients resent the attorney that will not bend the rules governing the practice of law to achieve the results they demand.

In order to properly respond to the Complaint filed by Crystal Sheffield, I must give a detailed background of the events that transpired in the initial stages of my representation of the client. Haleigh Cummings, a five (5) year old child, disappeared from her Father's mobile home in Satsuma, Florida, on or around February 10th, 2009. She has not been found, and there are presently no suspects named, or in custody with regard to her disappearance. Her mother was my client, Crystal Sheffield. The Father of the child is Ronald Cummings, who was awarded custody of Haleigh and her four (4) year old brother, Ronald Cummings, Jr., by and through a Judgment of Paternity in 2005 in Putnam County, Florida.

A. INITIAL CONTACT WITH FAMILY

When I was contacted by Crystal Sheffield to be her spokesperson for the media and assist in family law issues, it had been approximately one (1) month since her five (5) year old child, Haleigh Cummings, had

disappeared from her Father's home. Crystal, her family, friends, and advocate, had already appeared on numerous occasions on national and local television, late night news shows, had given multiple interviews to journalists. As the mother of the missing child, Crystal Sheffield and her family were under intense scrutiny of the national and local spotlight. I did not represent Ms. Sheffield's family members in any capacity.

Contrary to the allegations in the Complaint, I was first contacted by Crystal Sheffield through her Advocate, Wayanne Kruger, on March 9, 2008. I did not initiate contact with anyone involved in the case, and quite frankly, had little knowledge of the circumstances other than what I had seen on late night news. My cellular telephone records reflect the date and the time of the initial three-way call I received from Satsuma, Florida from Child Advocate, Wayanne Kruger, and a private investigator for Ms. Sheffield by the name of William Staubs. **Exhibit to be Provided Upon Request**. I had been referred to the case by Mr. Staubs, an investigator and bail bondsman from whom I had personally knew from Fort Lauderdale, Florida. Crystal was being highly criticized by the media, as she was not the custodial parent of the missing child. Further, Crystal had become the object of the public's outrage, due to her admitted limited involvement with her children prior to Haleigh's disappearance, failure to pay child support since the Final Judgment of Paternity in 2005. In fact, days before the child went missing, Crystal had been served with a Motion for Contempt and a notice to appear in court for failure to pay child support to the custodial parent, Ronald Cummings.

There was active and intense media attention devoted to the missing child's case, which fell on the heels of Casey Anthony's arrest for the murder of her young daughter in Orlando, Florida. The family members, friends, and enemies on both sides of the missing child's family, were being subject to intense intrusions and investigations by the media and the public at large. The private investigator and advocate explained that they needed an aggressive non-local attorney to assist Ms. Sheffield attempt to overturn the previous court decision granting the Father primary custody, as Crystal had never been served with any pleadings on the matter prior to the Court's 2005 ruling. Further, they believed that Ronald Cummings family had corrupt "ties" with the local authorities, who were attempting to "cover-up" facts and circumstances about the child's abduction. They firmly believed that the family's telephones and homes were being wire tapped, and that they were under surveillance by authorities, the media, and the Cummings family.

The following day, March 10, 2009, I spoke with directly with Crystal Sheffield on the telephone for the first time. She was timid, and grief stricken. I attempted to get basic facts about her, and her background, but she was quite clearly too traumatized by the abduction of her daughter to speak at great lengths. I could almost feel the sheer grief in her voice, and when she asked me if I would come to Satsuma to help her, I did not hesitate. I initially informed Crystal that it is usually beneficial to have a local attorney litigate any post judgment issues in her paternity case, but she believed that all of the lawyers and law enforcement in Putnam County were "corrupt" and incompetent. After several telephone calls that day with Crystal Sheffield, I was determined to help this grieving mother who I believed had been a victim of media "spin", and had been unfairly treated in her original paternity litigation. I agreed to give my services to her on a pro bono basis. I understood that she would not be able to pay any litigation costs whatsoever, as she was indigent and unemployed, so agreed to personally cover those expenses as well.

By March 11, 2009, my office was being bombarded with calls from nearly every national and Florida media outlet in the nation. My office staff and I were literally inundated with hundreds of telephone calls and emails from concerned members of the public, well-wishers for, or detractors against, Crystal Sheffield, and psychics with "solid" theories of where the missing child could be found.

B. COMMENCEMENT OF REPRESENTATION/DILIGENCE

On March 11, 2009, I said goodbye to my own family, and drove from my home in Broward County, Florida, 4 ½ hours to Satsuma, Florida, to begin my role as spokesperson and attorney for Crystal Sheffield. During the drive to Putnam County, I received telephone call after telephone call from members of the press, and locals in the Putnam County area who wanted to tell me information they had with regard to the disappearance of Haleigh Cummings. Members of the community came out of the woodwork to describe a dangerous and abusive lifestyle led by the Cummings/Sheffield children while in the custody of their Father.

When I arrived in Satsuma, Florida on the evening of March 11, 2009, to personally meet my client, Crystal Sheffield, she was holding a televised candle light vigil for her missing daughter. She and her family had erected a tent outside the gates of the trailer park from which Haleigh went missing. The makeshift tarp was exposed to the elements, but friends and family gathered there during the day and evening to convene and stage

nightly Vigils in Haleigh's honor. In our initial meetings I attempted to gain background facts about my client, and her relationship with her children. The picture that was initially presented to me upon my entry into the case was much different than what I later learned to be factually true and correct. As a family lawyer, I understand that a client's perception of their family law case and the outcome of the litigation, may be colored by emotional bias.

The client and her family informed me that Crystal had begun living with Ronald Cummings, then age 16-17, when she was only 14 years of age. She and Ronald lived in a small mobile home, and were both using drugs for years during their relationship. Crystal did not work during the relationship. Haleigh was born when Crystal was still a teenager, and suffered from Turner Syndrome. Her medical condition required the child to have special and frequent medical attention. Ronald Cummings was gainfully employed during most of their relationship. After their second child was born, when Crystal was 19 years of age, the couple separated. Crystal explained that after their separation, Ronald kidnapped the children, by failing to return them after visitation. Thereafter, he retained the children in his custody, and filed a Paternity actions seeking primary residential parent status. Crystal claimed not to have been served with any pleadings or notices whatsoever by the Court. She later became aware that Ronald had intentionally given the Clerk of Court an incorrect address at which to serve her with process. The Final Hearing came and went, and Crystal was not allegedly aware that the proceedings had taken place. According to Crystal, custody of her children was awarded to the Father, Ronald Cummings, by default. No post-judgment requests for modification of child custody or timesharing were ever filed by Crystal.

Crystal and her family were very concerned about the welfare of the children for many years after the Final Judgment. According to the client and her family, the Father of the children physically abused the children. They stated they had called the Department of Children and Family ("DCF"), and had made numerous complaints over the years, but that no action was ever taken against Cummings. The client and her family gave me multiple pictures of the children with bruises and scrapes, which they claimed had been inflicted by the Father. Further, Crystal represented that Cummings had an extensive criminal history, however had never served jail time because his Mother worked for the court system and/or police, and they felt used her influence

to ensure criminal charges against her son were dropped. Crystal and her family were convinced that Cummings and teen girlfriend, Misty Croslin, were directly responsible for the disappearance of Haleigh. They demanded that I investigate the claims, and paint a more accurate portrait to the media of the background, and lifestyle, of Cummings and Misty Croslin.

Given the severity of the abuse allegations, I made an immediate appointment with the Putnam County Department of Children and Families, as well as the law enforcement authorities investigating the disappearance of little Haleigh. Crystal and her family encouraged me to keep Haleigh's face in the media, and to tell the world the truth about Cummings. They believed that if the world knew of his background, there would be a public demand to ensure law enforcement investigated his involvement in the abduction. Since the family believed that the authorities were corrupt and biased toward the Cummings family, they insisted that the "truth" about Haleigh's Father be subject to public scrutiny to ensure nothing was "covered up" for him.

It was clear that the matriarch of the family was Crystal's mother, Marie Griffis. Marie was at all times outspoken, demanding, and extremely controlling of Crystal. She insisted that certain aspects of the case be divulged to the media. Mostly, this information related to negative rumors about Ronald Cummings. When Haleigh disappeared, Marie and Crystal temporarily resided in Satsuma, FL. At that time, I learned that Marie Griffis had already begun a rather formal and publicized campaign for donations for her family. When I first arrived in Satsuma, I noted a handwritten poster at the family's Haleigh Tent advertising a raffle for a Ford Expedition to take place on March 16, 2009. **Exhibit To Be Provided upon Request.** The raffle had been arranged by Marie Griffis with a local car dealership in her local town. All proceeds of the raffle were to be donated to the Sheffield/Griffis family. Further, the family and their friends had organized charity events in Haleigh's honor at local businesses, set out donation jugs in town and at the tent, ordered tee shirts, pins and other trinkets with Haleigh's picture and information displayed, and were selling these items for a profit to locals and tourists. All proceeds were, at that juncture, unaccounted for to my knowledge, and were being spent as they came in by the Crystal and Marie Griffis.

Although my area of expertise is not in charitable organizations, I understood that these activities required legal formalities. I had several discussions with Crystal and family regarding the propriety of seeking

donations for their personal financial support. In my judgment, a request for temporary financial aid to Crystal would be appropriate during the initial states of the investigation. However, I cautioned the family, on numerous occasions, that as time went on, continued efforts by them to solicit funds and donations would not be well taken by the public. When I came into the case, the family was in the process of creating a website in Haleigh's honor, as the Father's side of the family had already put up a website and was receiving donation therefrom. The family requested a "PayPal" donation button on their own website, but I refused. Since the family had already been soliciting donations and had scheduled charity events planned in the near future, I was under extreme pressure to ensure they were acting legally. My staff spent long hours building the website for Crystal, and were able to secure a website design company, IBI Designs, out of Boca Raton, Florida to donate their services for free. **Correspondence and Staff Notes Provided Upon Request**. We constructed a link for visitors to leave an Anonymous Tip for any information regarding the disappearance of Haleigh on the website. All anonymous tips were diverted directly to my personal email address, and I would forward the same to law enforcement. I received over one hundred anonymous tips through the link on the Haleighbug.com website.

I also arranged for and paid for a toll free telephone number for the public to call to send well wishes to Crystal and/or leave information regarding Haleigh's disappearance. I purchased a separate cellular telephone which was answered by a paid staff member to field calls on the toll free number. I incurred over $70,000 in costs and expenses on Crystal Sheffield case. **Expense Spread Sheets and Receipts Provided upon Request.** In total, I spent over 1,280 hours of my own time handling the various issues involved in the case, working on the various public awareness projects, investigating the disappearance of Haleigh, meeting with family, law enforcement and other officials, working on post-judgment family law issues, and providing information to DCF.

It was immediately apparent that the Haleigh Tent erected by the family was not a suitable place for our staff to set up their various computers, printers, files and/or field calls. We were in need of a central location for my staff and team members to meet, and for friends and family of Crystal to convene during the day. I rented a small building on the main highway of Satsuma. Crystal called it "the Haleigh Bug Center", a term of endearment she had often called Haleigh prior to her disappearance. The building was not in good repair, so my

team members and local volunteers, spent days putting in carpet, flooring, making the bathroom functional, caulking windows, etc. We decided to paint the building purple, Haleigh's favorite color. Everyone who drove down the main street in Satsuma would then notice the purple building, in furtherance of our public awareness campaign of the search for Haleigh.

Crystal took great pride and happiness in fixing up The Haleigh Bug Center, which was decorated inside and out with Haleigh's favorite things. I spent thousands of dollars remodeling, furnishing and filling the building with office equipment and supplies for the family. The Haleigh Bug Center represented many things to many people, but I felt it was a place where Crystal and her family could convene with local residents to discuss their grief over the disappearance of Haleigh Cummings. The Haleigh Bug Center became the hub of the Satsuma community – a place where friends and families would come to visit Crystal, and pray for the return of Haleigh. Crystal and her family spent substantial time at the Center, a place of comfort for her. I ensured there was funding for community barbeques at the Center, with free food and drinks for the community to thank them for all of their support for the continued search for Haleigh Cummings.

C. TRUST AGREEMENT AND ACCOUNT

Due to the family's active solicitation of donations prior to my being involved in the case, my staff contacted one of the most reputable charity and fundraising law firms in the country, Copilevitz and Canter, PA, out of Kansas City, Missouri. The firm agreed to give us legal advice on a pro bono basis. **Correspondence to/from Gregory Lam, Esquire to be provided upon Request.** In order to legally solicit donations for a particular person, ergo, Crystal Sheffield, we would need to follow the requirements of Fla. Stat. § 496.413, and establish a Trust Account for Crystal to receive all donations solicited and received by her for her financial support.

The family did not want to establish a charitable account for in Haleigh's name, as they claimed Cummings was the primary custodial parent, and would have a right to access the funds. I retained Brian Page, Esquire, of Greenspoon Marder, P.A. in Florida, who agreed to draft the Trust Agreement on a pro bono basis. I worked with Page regarding the various provisions to be included in the trust, as well as the funds that were presently being received by the family. Mr. Page informed me that the small amount of donations received thus

far were not a concern, and that the family needed to fully account for all moneys received in the future with receipts. After the Trust document was executed, Crystal could open up a Trust Account at a local bank, and the funds would flow directly in and out of that account.

I informed Crystal and family of the attorney's advice, and to closely monitor all funds received, and spent by them. I also instructed the family to keep a log book to keep written record on the receipt and expenditure of all donations received. Marie Griffis personally kept a book of receipts and expenditures, and she has produced a copy of her entries to my office. **Document Provided Upon Request.** Marie informed me that her personal friend, Debbie Huddleston, retained other log entries of receipts, through written correspondence. **Email Provided Upon Request.** Crystal and Marie are well aware that I did not keep any books or receipts for their donations, as I never personally accepted, solicited or held any funds or donations whatsoever. Marie is in possession of every document she kept at the Haleigh Bug Center. Crystal received donations directly, usually handed to her directly in cash from friends or family, or mailed directly to her address. I was never ever in possession of, or had knowledge of the amount of funds the family received, or spent.

Crystal Sheffield told me on numerous occasions that she had given the envelope of cash donations to her personal friend, Jeremiah Regan. Jeremiah was the son of a local pastor, and had befriended Crystal prior to my entry into the case. I did not personally know Jeremiah Regan prior to this time, but it was the client's decision as to who should hold her funds. I conferred with Crystal on several occasions to confirm she wanted Jeremiah Regan to continue holding her funds, and she affirmed this to me on several occasions in front of friends, family and my staff members. Marie Griffis did not seem to like or trust Jeremiah, but Crystal felt comfortable with him holding her "envelope" for her. I have no information or evidence that Jeremiah Regan ever mishandled any funds contributed to Crystal Sheffield. He has provided a formal accounting of moneys expended from contributions, and a copy has been previously provided to Crystal and her family. **Document available upon Request.**

Until a Trust or other legal mode of soliciting donations was in place, I instructed the family to cease all attempts to collect funds from the public. **Emails provided upon Request.** We had several conflicts with

Crystal's choice of Trustee for her Trust. She could not decide who was to be named Trustee, and changed her mind on several occasions. Without a named Trustee, the trust attorney, Brian Page, was unable to complete the Trust Agreement for the family. Finally, Marie Griffis wrote me an email stating that she had given Crystal $1,400 to put in her personal account, and only had $217.00 left in donations. **Email Provided Upon Request.** Further, the family made numerous allegations against friends and/or family members stealing funds from the donations. **Emails Provided upon Request**. I could not control the bickering between friends and family over the funds, and they became very distrustful over one another. I would hold meetings with the family and their friends in an attempt to quell the issues between them, to no avail.

By early May, 2009, I was informed by Marie that all funds from donations had been spent by the family, they had not agreed on a suitable Trustee for their Trust Account. Marie Griffis expressed her desire to form the nonprofit organization to seek donations from the public to aid families of missing children, and the search for Haleigh Cummings. Further, Marie stated she wanted to "get her daughter off the couch" and have her do something besides watch television all day. I became aware that Marie had already been in negotiations with a concert promoter to hold a concert event to honor Haleigh, and to gain contributions and funds. **Email Provided Upon Request.** I highly disagreed with such organized efforts to raise money in the name of the search for Haleigh Cummings. **Email Provided Upon Request.** Already, there was a vocal minority of the public that felt that Crystal's seeking of donations was insidious, and was an attempt to make a living off her own missing child. The public began sending me "hate emails", chastising me for being involved in an effort to make money off of the name of a missing child. I did my best to curb the detractors, and was consistently having to engage in damage control to keep Crystal from appearing like a mother who was getting rich off her child's tragedy.

I never saw the funds that were received by the family, never received single dime from donations to Crystal, and never asked for, or received, a single reimbursement for the tens of thousands of dollars of supplies, costs, expenses, office equipment, and staff, I had gratuitously devoted to the case. I never opened a Trust Account for the family, as the Trust Agreement was not completed, and all funds collected were spent by the family. Marie kept all log books, documents and papers regarding the families' receipt of funds from the public.

The allegations of a "money scheme" by Haleigh Cummings' family increased over time, and the family was eventually reported to the Department of Agriculture. I agreed to assist them in the complaint process, and obtained legal advice from the law firm of Rothstein, Rosenfeldt, and Adler, PA, in Broward County, Florida. We began the process of setting up a charitable organization to be run by Marie Griffis and Crystal Sheffield. I personally paid for all fees for the incorporation, registration with the state and counties, and filled out required forms to be signed by Marie and Crystal. I did not have, nor did I desire, any interest in the corporation, Haleigh Bug Foundation, Inc. Initially, I was listed as the Registered Agent for the corporation, but later transferred that title to Marie Griffis. Haleigh Bug Foundation, Inc. was officially incorporated on May 8, 2009, and granted permission to solicit donations to the public on July 1, 2009. **All Official Documents and Correspondence to be Provided upon Request.** I have never had any dealings or association of any kind with the Haleigh Bug Foundation, Inc., other than the initial set-up process. I advised the family that we could obtain an accountant to go over record keeping procedures for the corporation, but Marie stated she was a certified tax planner, and had a nephew who was a certified public accountant to handle the books. **Emails To Be Provided Upon Request.**

D. DILIGENCE IN POST JUDGMENT FAMILY LAW ISSUES

In my first week on the case, I met with DCF officials regarding the allegations of abuse against Ronald Cummings, the children's custodial parent. Crystal attended the meeting with me. To my surprise, a DCF investigation was already ongoing with regard to the welfare of the child remaining in Ronald Cummings' care. For months thereafter, I worked tirelessly, giving additional information and witness names to the DCF caseworker in charge of the file. I provided the pictures of injuries to the children to the DCF caseworker, however I later learned that those injuries had previously been investigated by DCF at the request of Crystal Sheffield, and no evidence of abuse was found.

I ordered the case file in the parties 2005 Paternity case, including having all hearings transcribed. Upon reviewing the court file, I found that my client had not been completely honest with me regarding her involvement in the Paternity proceedings of 2005. The Court file reflected an Affidavit of Service of the original Petition for to Establish Paternity, personally served on Crystal Sheffield. Crystal then missed the Final Hearing, and the Court entered a Final Judgment of Paternity in favor of the Father. Ms. Sheffield then wrote a

letter to the Court explaining that she had never been served with the paperwork or a Notice of Hearing. The Court granted a rehearing of the case, and Ms. Sheffield was represented by counsel, Charles Behm, Esq., in those proceedings. At the Final Hearing, Ms. Sheffield's attorney was not in the Courtroom, pursuant to the transcript. The Court took testimony from both parties during the Final Hearing. The testimony reflects that Crystal did not have a job or job prospects at the time of the trial, that she had used drugs during the relationship, that she had missed twelve (12) recent doctor appointments for the children, that she had no way of providing medical insurance to the children, that she was living with her mother who financially supported her, that she would need to share a bedroom with one of the children while living with her mother, and that she made few attempts to have timesharing with the children for months after the Father took custody of them due to his concerns with her cocaine use. The Court ruled that the Father be designated primary custodial parent, and that Crystal could visit the children on alternating weekends (with shared holidays). Crystal was imputed minimum wage income for purposes of child support.

Thereafter, Crystal filed exceptions to the General Magistrate's Report, requesting a reconsideration of the ruling. The Court held a hearing on the motion, and denied relief. The Circuit Court Judge then ratified and approved the Magistrate's Report and Recommendations. Upon reading the court file, I realized that I had not been given thorough or accurate information regarding the procedural history of the paternity action. The procedures followed by the Court were standard. Crystal had had her day in Court, and had lost – fair and square.

Prior to my coming onboard in the case, Crystal and her family, in an effort to raise her public image, had told numerous media outlets that the only reason that she did not have custody of her children was that she was not served with court papers, and had lost custody by default. Also, she claimed on national television that Ronald had kidnapped the children, and that his family, through their collusion and "connections" in the courthouse, made sure that Ronald retained custody of the children. This claim was simply untrue, and I was wholly unwilling to corroborate their previous version of the court file. I spent numerous meetings with Crystal and her mother, explaining that I could not attest facts that were untrue to the media, or to anyone else. At that time, I believe that a wedge began to form between Marie Griffis and I.

Crystal's former private investigator William Staubs entered into a contract for investigative work with Crystal's Father, Johnny Sheffield. Surprisingly, Crystal's own father began doing interviews with avant guard media forums claiming that Crystal had a present drug problem, and was in need of rehabilitation. **Media Content Provided Upon Request.** In late March, 2009, Crystal Sheffield suffered a seizure while driving her vehicle with her infant daughter in the car. Upon learning of the car accident, I was then informed by Crystal's fiancé for the first time that Crystal had been previously instructed not to drive her vehicle by her primary care physician, as she had suffered seizures in the past.

Unbeknownst to me, Crystal's father had come upon the scene of her car accident to assist his daughter. Crystal's Father has allegedly executed a sworn affidavit stating that when he came upon the scene of the accident, Crystal admitted to being on prescription pain medication (unprescribed), and gave her father the pills to hide from the police who were on their way to the accident site. I was not aware of Crystal's drug use, or of the affidavit executed by her own Father, until months later, in June, 2009.

The Department of Children and Families became aware of the allegations of drug use by Crystal. DCF requested a random toxicology test of Crystal Sheffield, during the course of their investigation, as they found it relevant to investigate Crystal's fitness as a parent. At that time, in June 2009, I learned from DCF that Crystal's infant daughter, Chloe, not even one (1) year of age, had been born with illegal narcotics in her system due to Crystal's drug use during her pregnancy. The DCF caseworker had not informed me of this DCF case against my client, and I had no prior knowledge of the case until that time. DCF dismissed the investigation against Ronald Cummings, without explanation.

I felt as if I was only being told relevant information by the family, after a fiasco had occurred. I could not represent a client who was not being honest with me, and was taking illegal drugs. To make matters worse, In April 2009, Crystal admitted to me that she had taken unprescribed pain medication. Further, her mother, Marie Griffis, reported to me that Crystal had stolen her step-father's pain medication after he had surgery in April 2009. I was extremely concerned over my client's drug use. Crystal assured me that it was not an addiction, and that it had only taken a few pills due to back pain from an old car accident. In April, 2009, Crystal suffered another seizure, and was taken to the hospital by ambulance. All of these incidents played out

loudly in the media. Despite my requests to family and friends to withhold all comments to the media about Crystal's seizures, they defied my recommendations. As such, I then was forced to issue numerous press statements regarding Crystal's status. **Emails and Media Content Provided Upon Request.**

After learning of these incidents, I had multiple conversations with my client regarding her potential for success in a family court proceeding to modify custody. She was again unable to drive due to her seizures, and had not begun to look for a job. She had no ability to support herself or her children, and there was evidence of her recent drug use and driving while under the influence of unprescribed pain medication. Further, her own Father had strongly represented to the media that he would testify that she was not fit to care for her children, due to her consistent drug use. After multiple conferences with Crystal, we decided to request a copy of the toxicology report from the Hospital where she was taken after her car accident, to confirm whether there was documentary evidence of her driving under the influence of drugs. Documentary evidence of that sort would be devastating to her chances at modifying custody, even in the most perfect of circumstances.

Despite repeated requests, both in writing and orally, Crystal failed to request the toxicology test results from the Putnam County Medical Center. **Correspondence Provided Upon Request.** Despite Marie Griffis demanding I file a modification proceeding to seek custody of Crystal's son in Ronald Cummings' care, I was not willing to lie to the Court, and I did not feel that such an action would be successful. Marie Griffis became increasingly angered at my hesitancy to file a court action for a change of custody. In good faith, I was simply not willing to file such a pleading, knowing my client was using drugs, suffered seizures and could not drive. Further, Crystal was prescribed very heavy medication for her seizures, which caused her to be disoriented, dizzy, and have slurred speech. Filing an action for a change of custody was simply not going to be successful at that juncture. I informed Crystal and Marie on several occasions of my recommendations and my opinions, but it was met with anger and frustration. There were many times that I requested private meetings with my client alone, as otherwise, her mother would insert her own feelings and demands on me and the case strategy, leaving Crystal's feelings and desires unheard and discarded.

I turned my attention on resolving conflicts between the parties with time sharing, pick-up and drop off, and co-parenting. Crystal had never complained about her complete lack of involvement in her children's lives

since 2005. She did not attend doctors or dentist appointments, or even know who their medical care providers were. She did not ever visit the children during the week, even though her Final Judgment provided that the alternating weekends were a minimum visitation schedule, and permitted her to see the children during the week upon notice. Crystal did not speak with her children over the telephone during the week, and her only contact with them was roughly four (4) days per month on alternating weekends. Crystal had not been involved in Haleigh's school, school functions, and did not even know what school Ronald, Jr. would be attending in the Fall of 2009. In an effort to increase her awareness and involvement in Ronald, Jr. life and upbringing, I worked amicably with opposing counsel, Jerry Snider, Esquire, of Palatka, Florida.

I conferred with Crystal about all the typical problems that had historically arisen between the parties involving the children. I asked what she "would like" to happen in the future with regard to her involvement in the children's lives. And I was able to enter into an Agreed Order resolving all of these conflicts in Crystal's favor. The Agreed Order gave Crystal a renewed sense of parenting Ronald, Jr., and would lend in reestablishing her relationship with Haleigh, if found and returned home safe.

E. DISCLOSURE OF PRIVILEGED INFORMATION TO MEDIA AND/OR INTERNET BLOGGERS

Prior to this case, I had no idea what a "blog" was, and had never been on any discussion or message board. From the very inception of my role on the case, Marie Griffis began sending me emails from various blog sites, and/or comments posted by members of the public following internet news stories. As stated, in March 2009, Crystal Sheffield was disliked and distrusted by the public, and there was a growing internet public that spread rumors about Crystal and her family. I instructed the entire family and their friends to stay away from the Internet blogsites, and that my staff would monitor the discussion boards for any pertinent information or issues to be handled by me. **Emails To Be Provided Upon Request.**

I kept in close contact with the Putnam County Sheriff's Office during my representation of Crystal Sheffield. When I was first retained by Crystal, I conferred with the lead members of the Task Force investigating Haleigh's disappearance. It was my understanding that Crystal was not a prime suspect in the case. The lead investigator on the Haleigh Task Force is Detective Peggy Cone, with whom I had multiple telephone calls with on a weekly basis. Every credible lead or tip received by me or members of my team were

given, usually in writing, to Detective Peggy Cone. I made it clear to Putnam County Sheriff's Office that I did not want my role as Crystal's attorney to impede the investigation in any way, and that we were there to assist in any way we could. It was imperative that every member of my team, or those associated with Crystal Sheffield, remained above-board, and in good standing with law enforcement. I insisted upon proper procedures being followed by all of my employees, as well as the volunteers who assisted in the case. I enjoyed a good relationship with the detectives on the Task Force, and was given assurances that they appreciated how I handled the difficulties of case.

Although I gave specific recommendations and guidance to Crystal to call the Sheriff's Office once per week to check on the status of Haleigh's case, she failed to do so. I do not believe she called the Sheriff's Office for a status report on a single occasion during my representation. As such, I took the initiative and kept in close contact with the investigators on the case. I arranged for meetings between Crystal and the Task Force on several occasions. On one occasion, it was intimated that the intense media coverage was causing a circus type atmosphere in the case. After the conclusion of the meeting, I spoke at great lengths with Crystal and her mother about slowing down our appearances in the media. Marie Griffis was extremely upset, and demanded that we keep Haleigh's face on the news. We discussed the pros and cons of the continued media appearances, and I attempted to persuade the family that we needed to heed the directives of law enforcement. Unfortunately, my recommendations were met with great resistance and anger by Marie Griffis. Thereafter, I spoke with Crystal, advised her that we needed to respect law enforcement's wishes, and she agreed. I then began to gradually accept less media offerings, with the consent of my client.

At all times, Crystal and Marie Griffis were aware and encouraged me to continue having staff members monitor the discussion boards for relevant information, and to quell rumors. Marie was very distressed about the internet rumor mill, and I felt she put too much emphasis on the "name calling" that was going on over the internet. Prior to my entry on the case, Marie, members of the family, and their friends, engaged in a war of words over the internet to fend off Crystal's detractors. I encouraged them to stop blogging, and allow members of my staff to monitor the internet. If a comment or rumor needed to be handled, I often times discussed the matter with Crystal and or made announcements through the media with the express client's consent. In May

2009, Marie Griffis again began to blog on the internet. **Blogs to be Provided Upon Request.** When asked about this issue, she denied the same to me.

I soon learned that much of the public's conversation regarding the Haleigh Cummings case over the internet served as the foundation for media and news stories. My staff members had strict instructions never to blog – just to report any issues that I may need to be aware of. Interestingly, my staff came upon relevant internet chatter by local residents to the Putnam County and surrounding areas, swapping rumors or eye witness accounts of the behavior, lifestyles, and whereabouts of Ronald Cummings and Misty Croslin. Many of the posters on the internet knew them personally, or lived in their neighborhoods. The monitoring of the discussion boards became an important tool in gaining inside information about Ronald Cummings and Misty's lifestyle leading up to the disappearance of Haleigh.

I contacted the Administrators of two (2) of the most reputable News Crime Websites, who set up accounts for my staff. Again, my staff did not blog, they only monitored relevant information being discussed, and passed the same along to me. I became quite friendly with the two (2) Administrators of the crime/news websites, who would likewise pass along information to me that was relevant in the case, e.g. arrests of key persons of interest, sitings of Haleigh around the country, rumors of mistreatment of Ronald, Jr. witnessed by locals. Marie and Crystal were fully aware that my staff monitored the internet for information, and were copied on multiple occasions with various information my staff had come upon. **Emails provided upon Request.**

There were numerous occasions wherein the media and/or Administrators from news/crime websites, Kendall Clark, a/k/a Pirate Girl, and Karen Devine, a/k/a Top Gunner, requested confirmation or denial about a particular rumor or case fact. As a the media spokesperson for Crystal, it was part of my job function to confirm and/or deny rumors regarding the case and my client, whether it be to the media with a camera, or to internet news website Administrator. So long as the information was not privileged or could impede the investigation, I kept the public updated about the facts and status of the case, and quashed rumors or untruthful allegations regarding Haleigh or my client. I was careful with information, and only released facts that I felt were appropriate for public dissemination, or that I felt needed to be addressed in the best interest of my client. Again, whether to a news website, a newspaper reporter, or to Nancy Grace herself, I was charged with giving

truthful and accurate information to the public regarding the status of the Haleigh Cummings case, and my client.

I was well known as a fierce advocate for Crystal Sheffield, and would not hesitate to defend her credibility, reputation, ability to parent, and extreme state of grief over her daughter's disappearance. Crystal depended upon me for legal advice, emotional support, security, and personal advice on every issue in her day to day life. I would have never said or done anything to disparage or detract from her in the public eye, or elsewhere. At no time did I ever give private or privileged information regarding Crystal Sheffield or her case to the public or media. I was adamant about keeping the status of the DCF case extremely confidential, and would not release any facts, witness names or any information whatsoever to the media or public. I did not even divulge the caseworker's name to the public or media, as I did not want anything to impede the investigation into the welfare of Crystal's children. DCF officials have thanked me repeatedly for my discretion and ability to keep all information about their investigation confidential, and prevent any leaks whatsoever to the media. DCF officials often expressed their surprise that the status of their investigation was just about the only aspect of the case that the media never could pry open.

In an the email exhibit attached to the Complaint wherein I spoke of information I had gotten regarding Misty Croslin slapping the Ronald Junior in the back of the head, this information had already been released to the media through the eye witness to the event. I had discussed the incident on the news that evening. I had followed up with law enforcement in writing regarding the incident to Det. Peggy Cone, as well as to the DCF caseworker, Bonnie Warner, to ensure they were aware of the allegations. This was not new or novel information that I was divulging to a blogger. Quite to the contrary, such claims had been the topic of discussion in the media and the public at large. Further, Tammy Spratt, a/k/a Badme, is a personal friend of mine.

In a second email exhibit attached to the Bar Complaint, I am conversing with Administrator, Kendall Clark (Pirate Girl), regarding my own monitoring of rumors on the internet. The email references me "fighting with Ksue". Karen Simmer, a/k/a Ksue, is a well known blogger on the Blogger News Network Forum, who has made false reports about me, and my clients to law enforcement, the Sherriff's Office, America's Most

Wanted, the FBI, as well as the FDLE. To be clear, I have never blogged on Blogger News Network (BNN). Our office account for (BNN) is set up and registered under "Lanie", for which I can provide a status report reflecting no posts have ever been made through that account. Never.

All information confirmed to news or crime website Administrators was in the best interest of my client, portrayed my client in the best light possible, and was most often utilized quell allegations of criminal activity and fraud on behalf of my client. If the internet buzzed with rumors, such topics were sure to be a topic of discussion in the media within 24 hours, as all major media networks monitored the internet for topics of public interest. Early on in the case, I presented information to law enforcement that I my staff had gleaned over an internet news discussion board from a local resident of Putnam County. The Captain of the Haleigh Task Force at the Putnam County Sheriff's Office confirmed to me on many occasions that he personally monitored the internet for information, tips and leads in the case. Several Putnam County Detectives informed me that the internet was a useful tool in their investigations, as many individuals had relevant "inside" information, but were too intimidated to officially report the same to the police. At some juncture during the case, Marie came into email contact with Administrator Kendall Clark of The Garden Discussion Board. Kendall Clark and I were no longer on good terms, due to several occasions wherein I had refused to give her sensitive information about the case. Marie Griffis was given Kendall's private email account information for the purpose of reading every email we had ever exchanged between one another. When I became aware of this sneaking behavior on the part of Marie, I immediately confronted her with it, and told her that I had no issue with her reading all correspondence I had ever written or received in the entire case.

I received nearly fifty (50) emails per day from members of the general public, expressing theories on the case, or sending well wishes to Crystal. I responded personally to each individual in writing, as I knew they had taken the time out of their day to write to me regarding their concern with the disappearance of Haleigh Cummings. There were several individuals who wrote to me quite often, and many expressed their gratitude to me for continuing to vigorously defend Crystal, the mother of a missing child.

As the spokesperson for the family, it was my job and my duty to update the media about developments in the case of the missing child Haleigh Cummings, and the custody investigation being handled by DCF. At no

time did I ever divulge disparaging or confidential information about my client's background that was not appropriate. Of course, when one appears on live television, there is no script or forewarning about questions that will be asked prior to the interview. As such, it was my job to answer questions honestly, but throwing the best possible light on my client. If there was information that I believed was confidential, disparaging or would be inappropriate to divulge to the media, I would not comment, or state that I could not answer the question. It is not possible to anticipate the questions that will be asked during any given live interview. As the attorney and spokesperson for Crystal Sheffield, I was under an obligation to make split second decisions about how to answer questions to the media, which were, by the nature of "live television", at my discretion.

I appeared in over twenty (20) interviews with, or on behalf of Crystal Sheffield. That was what I was retained to do by the client. In each and every interview, I attempted to turn the media and the public around; to resurrect the public image of Crystal, to inform the public of the status of the case, and to answer questions about Crystal's feelings and intentions. Again, that was my job. By July, 2009, the majority of the media and public had a sympathetic view of Crystal Sheffield. It was a slow and gradual process, but I believe that the majority of the public who follow the Haleigh Cummings case have a positive outlook on Ms. Sheffield, and her fitness as a parent.

From the very beginning of the case, I requested that the family and family friends not make media appearances, or give comments to the press. This was due to the fact that their animosity toward Ronald Cummings had previously resulted in family members and friends erupting to reporters, cursing, and present as vindictive. Such public animosity took credence away from claims being made to DCF, and to any potential modification of custody action Crystal may file in the circuit court in the future.

For example, when Crystal was confronted by Nancy Grace on live television about her prior claim of a biased and corrupt paternity proceeding wherein she was never served with papers, I stepped in and assisted my client with the answering of the question. I agreed that she had been given proper due process, but that she was incapable, emotionally, of defending herself in court. It was the best I could say under the circumstances. In each media appearance, I was being called to the carpet regarding Crystal's failure to remain involved in the children's lives, her failure to pay child support, and her history of drug abuse. I fiercely defended her recovery

from drug addiction, and was able to somehow turn most of the country around with regard to their outlook on Crystal's life and background. I was requested by the family to continue appearing on media outlets, sometimes with Crystal by my side, and other times alone. However, at all times, Crystal was well aware of my media appearances, which were usually at the Haleigh Bug Center with her standing by. The few appearances that I made on national television outside of the Satsuma area were from Broward County, Florida, and were usually Tivo'ed by the family. I do not believe I was under any obligation to "ask" Crystal about each interview that I undertook, as we had specifically spoken on numerous occasions about her desire that I keep media attention high as to the disappearance of Haleigh, and to rectify her public image. However, in nearly all media appearances, Crystal was informed of media appearances before they took place, conducted the interview with me, or was present at the time the interview was being conducted.

Marie Griffis directly defied my recommendations not to speak directly to the media. On one occasion, an investigative reporter who I had come to know, called me and told me that Marie had just done a live interview, and had publically chastised and insulted the law enforcement team investigating the search for Haleigh. Although I could not persuade the reporter to withhold the media footage, he agreed to edit her strong language toward law enforcement officials, as a personal favor to me. **Emails and Content Provided Upon Request.**

Such public animosity and unbridled blame did not serve Crystal's interests, or make good impressions on the law enforcement team that were investigating Haleigh's disappearance. It was in Crystal's interest, and in the interest of her missing daughter, that law enforcement felt extreme empathy for Crystal and her family, so that they would want to go the extra mile in investigating the child's disappearance. However, no matter how much I pleaded with the family and their close friends to stay off the media and the internet, I was constantly putting out fires with regard to malicious statements and accusations being made and publicated by them. **Emails Provided Upon Request.**

F. CHILD SUPPORT REDUCTION/TERMINATION

I conferred with my client on numerous occasions about her child support obligation. I informed her from the beginning of my representation that her child support obligation could be decreased due to the fact that

there only remained one child to support in the Cummings household. Crystal had paid less than one thousand dollars ($1.000) of her child support obligation since 2005. **Itemization of Child Support Payments to Disbursement Unit Provided Upon Receipt.** Of course, in the initial months of Haleigh's disappearance, the last thing that I thought was appropriate would be to seek a modification of child support based on the fact that one child had been abducted. At all times, Marie Griffis felt we should file a court action lowering the amount Crystal was to pay to Ronald Cummings for support. Such an action was, in my opinion, highly inappropriate while investigators were still actively seeking to find little Haleigh and bring her home safely.

Further, I had meetings with Crystal and her fiancé, Chad Griffis, regarding the child support issue. It was their desire and intention to pay down the arrears, and not seek a modification of child support until a future date. Crystal did not want to seek a modification of her support based upon Haleigh's disappearance, as she did not want to ever believe that her daughter was not alive, and coming home. Consequently, Chad and Crystal had several discussions with me about paying down the child support arrears in bulk, and knew a family member that could assist them with a loan for this purpose.

I also had an agreement with opposing counsel to revisit the child support issues due to Haleigh's disappearance and Crystal's medical condition. **Correspondence Provided Upon Request**. During the course of the my tenure as Crystal's attorney, I have managed to gradually create a public outpouring of support for this mother of a missing child, who had lived in an abusive relationship with Ronald Cummings since the age of fourteen (14). Through media appearances with Crystal, we were able to tell the public that she was a struggling mother, who had made mistakes while she was young, but who desperately wanted her children in her custody where they would be safe from their present abusive and dangerous environment.

I received an email from a lady by the name of Barbara Johnson from Texas, who had seen my appearance regarding Crystal's struggles on the news one night. She wrote to me about how she was moved by Crystal's story and background and wanted to financially assist her. She represented that she wanted to pay down Crystal's child support arrears, as Ronald Cummings seemed to use her failure to support the children over the years, as testament to her lack of interest in the children. I exchanged several emails with Ms. Johnson, and over a course of weeks, she sent funds to completely extinguish Crystal's child support arrears.

Correspondence and Documentary Evidence Provided Upon Request. The total amount paid by Ms. Johnson toward Crystal's child support arrears was over $12,000. By July 1, 2009, Crystal Sheffield owed no child support arrears whatsoever, due to the generous donor from Texas. For the first time since 2005, Crystal was no longer at risk of a contempt sanction by the Court.

In early June 2009, I commenced discussions with Ronald Cummings attorney regarding the reduction of child support due to the number of children remaining in the home. Haleigh had yet to be found, and I felt that it was not too early to discuss a temporary reduction of child support. Further, I discussed other options with Crystal regarding child support. We could seek a temporary termination of child support, due to her medical condition (seizures). I asked Crystal to get a doctor's note prohibiting driving and/or working while she was undergoing tests to find the cause of her seizures. Although she attended doctor's appointments, she consistently forget to request such documentation from her medical caregivers. If she could obtain a doctors written prohibition of driving, we could seek a temporary suspension of Crystal's child support obligation. Regardless of my constant reminders, both orally and in writing, Crystal did not remember to ask her doctor for written recommendations in this regard. **Correspondence Provided Upon Request.**

On July 1, 2009, I once again called and wrote to Crystal prior to going to a scheduled doctor's appointment, and reminded her to get a doctor's written recommendation on work and/or driving. Finally, on July I, 2009, I received an email from Marie Griffis from Crystal's doctor, with illegible scribble, and a question mark on the space provided for a date to return to work. **Email Provided Upon Request.** I could not read the writing on the note, and neither could Marie or Crystal. I requested on numerous occasions for them to call the doctor's office and obtain a typed and signed recommendation from the doctor, but I received no further communication from either Marie or Crystal on this issue. **Emails Provided Upon Request.** I was extremely frustrated by the family's complete indifference to these issues, and their increasing lack of contact with me on important matters in their case. It was difficult to obtain any information from them to deliver to opposing counsel, who was patiently waiting for me to contact him on how we intended to proceed on the child support issues.

Marie Griffis continued to insist in sporadic emails that I file a modification of custody action against Ronald Cummings. On one occasion, I had arranged for the commencement of summer visitation with Crystal pursuant to the Agreed Order entered by the Court. The child was to be picked up by Crystal Sheffield on a date certain to commence his six (6) week summer visitation with his mother. Without giving me any notice whatsoever, Marie Griffis arranged for law enforcement from two (2) counties to search her property and home for Haleigh's remains on the start date of summer visitation between Crystal and her son. I awoke to telephone calls by the media, who were demanding a comment on my client's property being raided by over 40 law enforcement agents, who were actively digging up the property with machinery, and divers were searching the lakes and ponds for Haleigh's remains. I was flabbergasted, and completely taken off guard by Ms. Griffis' arrangements. Opposing counsel, who was on vacation at the time, called me frantically from his cell phone to cancel the commencement of summer visitation due to the fact that law enforcement was tearing up my client's property looking for missing Haleigh's body.

Marie continued to take dramatic measures and use self help throughout the case. These measures were not in the best interest of Crystal, was an impediment to the orderly course of my job functions, and became unmanageable. I believe as the attorney and spokesperson for the family, I should have been told of Ms. Griffis' plans and arrangements with law enforcement so that I could have forewarned opposing counsel, and indirectly, the Father of the child, that the search was being done at the invitation of Marie Griffis – not because law enforcement had credible information that the child was buried on Crystal and Marie's property. To make matters worse, I was shocked to be sent an email by my staff, noting that Marie had written a "Tweet" on her Twitter account, stating that she knew ahead of time about the search, but that "KP" did not. **Twitter by Marie Griffis to be Provided Upon Request.**

After that time, it was clear that Crystal's mother, Marie, was determined to disparage me and my reputation. I attempted to speak with her on several occasions about our relationship, but she assured me that everything was fine, and that she appreciated me continuing in the case. Unfortunately, this was not true, and I became aware that Marie was posting disparaging comments about me over the internet, and our relationship was irreparably damaged. Gradually, I was spending more time in the Broward County area, and less time in

Satsuma. I was having daily telephone contact with both Marie and Crystal, until I recommended against filing a custody modification action until we could see the results of Crystal's toxicology tests from the hospital after her car accident. At that juncture, their communications with me became less, and I would leave messages for them that went unreturned for days.

In June, 2009, without my knowledge, Marie travelled to Satsuma and completely cleared out the Haleigh Bug Center. She took every piece of furniture, every printer, file folder, etc., and took the contents of the building to her farm in Glen St. Mary, Florida. I had paid the rent, security deposit, and all utility bills on the Haleigh Bug Center for each month from March through June, 2009, with the exception of one month paid by Marie with donations from the public. All office items were taken by the family, and I have not seen or been copied with any of the documents that were taken from the Haleigh Bug Center. Further, I had hired Marie Griffis' best friend to work at the Center as an employee. I had been paying her for several weeks to keep track of tips, leads, and generally, to "keep the doors open". When Marie surprised us with an abrupt move-out of the Center, I gave her friend, Jennifer, a week's severance pay so that she could find alternate employment.

I believe one of the most humiliating moments in my life came when I received an email from a complete stranger, bringing my attention to an email from Marie to a "blogger" which was being distributed on major websites across the internet. Marie stated to a complete stranger in the email that I had failed to file for custody of the child despite repeated demands to do so, that I had only been on the case to seek fame, and that I had an affair with a volunteer working at the Haleigh Bug Center, and that she was intent on making Crystal angry enough to fire me. She requested that the blogger find out more incriminating information against me, and stated she hoped to see me in jail from the allegations she was giving law enforcement. **See Email From Marie Griffis as Exhibit attached hereto.**

CONCLUSION

The last thing on my mind when I agreed to take on this complicated, highly charged case was media attention for myself. In fact, I had consistently cautioned the entire family about law enforcement's desire that we curb the media frenzy surrounding the case. I spent tens of thousands of dollars of my personal funds in mounting a public awareness campaign to keep the search for missing child Haleigh Cummings alive. I spent

literally over one thousand hours working on the case, which involved multiple issues, conflicts, and attacks against my personal reputation and integrity. Despite being urged to quit the case by my colleagues, friends, and family, I stayed in, through thick and thin, as I could not leave Crystal to fend for herself against the vicious intrusions and reputation attacks she had endured in the past.

With regard to media appearances, I was encouraged by Crystal and her Mother, Marie Griffis, to speak with every media outlet to ensure that Haleigh's case did not become a cold case file. Crystal insisted that we keep the media attention high to ensure Haleigh's search would not become a low priority for law enforcement. Crystal and I appeared together many times on national and local news. Again, it was important for the family to raise Crystal's public image, to force the nation to appeal for a continued search on numerous media appearances together. During the course of the case, I learned many difficult lessons. In an effort to aid and advocate for a mother of a missing child, I devoted my time, my staff, my energy, and my own family's funds. My client and her family had high expectations regarding results in the case involving custody of Ronald, Jr. that I did not feel comfortable bringing forward to the Court. I spent over $70,000 of my personal funds fighting and defending Crystal Sheffield and looking for her missing daughter, Haleigh. I never asked for a thing in return.

My only contact with Ms. Sheffield after my tenure on the case has been by a summarizing correspondence recapping the case, as well as one telephone message to ask her if she needed emergency assistance after Ronald Cummings was recently arrested. I have made no other contact attempts to Ms. Sheffield, or any other member of her family.

It should be noted that to date, Crystal Sheffield's new attorney, Carol Caldwell, Esquire, has not filed a Supplemental Petition for Modification of Custody or for a request for a Modification and/or Termination of Child Support. She has been retained as the family lawyer for Crystal Sheffield for nearly two (2) months.

THE FLORIDA BAR INQUIRY/COMPLAINT
KIM L. PICAZIO

THE FLORIDA BAR
RECEIVED
OCT 12 2009
ACAP
TALLAHASSEE, FLORIDA

RESPONSE TO KIM L. PICAZIO
FILE NO.: 2010-50,286 (1711)

Name: Crystal Sheffield Address: 12222 Mud Lake Road City: Glen St. Mary State: Florida Phone: (904) 373-4145 Zip Code: 32040 Name: Marie Griffis Address: 12222 Mud Lake Road City: Glen St. Mary State: Florida Phone: (904) 275-3471 Zip Code: 32040	Attorney's Name: Kim L. Picazio Address: One Financial Plaza Address:100 Southeast Third Avenue, Suite 2500 City: Fort Lauderdale State: Florida Phone: (954) 467-5558 Zip Code: 33394

The response filed by Kim Picazio addressing the original complaints contains her response to the specific complaints, along with a multipage narrative of the case. The superfluous narrative seems to serve no other purposes than to defame her clients and confuse the issues that have been reported in this complaint. Crystal Sheffield and Marie Griffis will only respond to valid rebuttals to reported infractions. Miss Picazio's attempt to disguise inflammatory, unrelated allegations as valid responses to the complaints should be noted.

The first issue that should be addressed is the fact that the Sheffield/Griffis Family was in the middle of a terrible crisis, the disappearance of a child, when Kim Picazio began representing them. The confusion, worry and stress that surrounded such a traumatic event had a profound physical and psychological effect on Kim Picazio's clients. In a situation such as this, it was very important for communication between attorney and client to be clear, consistent and documented.

The second issue that should also be addressed is the fact that Kim Picazio represented and spoke for Crystal Sheffield and her family, including Marie Griffis. One only has to read Kim Picazio's own response to establish that fact. There are numerous references to her advising and consulting with the family. She spoke for the family on multiple occasions. There is ample evidence that Kim Picazio advised the family on many legal issues and represented herself as a family spokesman.

Crystal Sheffield and Marie Griffis will not comment on the initial contact between Kim Picazio, William (Cobra) Staubs (personal friend of Kim Picazio) and Wayanne Kruger due to the fact that neither of them (Staubs or Kruger) were official representatives of the Sheffield/Griffis family. The issues discussed are irrelevant to establishing the professional relationship between Kim Picazio and the Sheffield/Griffis family.

RESPONSE TO KIM L. PICAZIO
FILE NO.: 2010-50,286 (1711)

The Rules of Professional Conduct 4-1.6 (a) Violations

The Florida Bar Rules of Professional Conduct 4-1.6 Confidentiality of Information *Subdivision (a) states Consent Required to Reveal Information. A lawyer shall not reveal information relating to representation of a client except as stated in subdivisions (b), (c), and (d), unless the client gives informed consent.*

Crystal Sheffield and Marie Griffis continue to contend that it was agreed that Kim Picazio would appear with Crystal Sheffield on television programs solely to support her and assist with any legal questions. There was no informed consent granted to release any other information beyond what was required for the television appearances. Crystal Sheffield and Marie Griffis also agreed that Kim Picazio would represent Crystal Sheffield in all child custody issues concerning HaLeigh Cummings and Ronald Cummings Junior. Both Sheffield and Griffis expressed their desire for Crystal Sheffield to gain custody of her children.

Crystal Sheffield and Marie Griffis continue to contend that these are the only activities that were discussed and agreed upon between the parties of Kim Picazio, Crystal Sheffield and Marie Griffis. All activities outside of these agreements were not discussed or authorized by Crystal Sheffield and Marie Griffis.

Kim Picazio has described her dissemination of information on the internet as if she was reigning in her unruly client Marie Griffis. She characterized her involvement as having her staff monitor internet crime boards to quell rumors and she denies any direct involvement in the posting of sensitive information herself. These are false statements. The emails previously attached as exhibits to the original complaint are just a small example of the type of information that was commonly posted. Electronic records available upon request.

The problem of Kim Picazio sending out sensitive information for posting on the internet became so out of control that Captain Dominic Piscatello, a lead investigator in the HaLeigh Cummings Case became very upset about vital information being leaked to the media and on internet blogging sites. Crystal Sheffield and Marie Griffis both heard Captain Piscatello tell Kim Picazio that she was hurting the case by giving this information to the media and to bloggers on the internet. Captain Piscatello instructed Kim Picazio and her staff to cease internet blogging.

RESPONSE TO KIM L. PICAZIO
FILE NO.: 2010-50,286 (1711)

The Rules of Professional Conduct 4-1.6 (a) Violations

On another occasion, Crystal Sheffield and Kim Picazio had a meeting with the FBI, FDLE and Putnam County Sheriff's Office. Important information has disclosed to them that had not been released to anyone outside of law enforcement. They were instructed by all agencies not to share this information with anyone. As soon as the meeting concluded, Kim Picazio was sharing the information with Marie Griffis. Later that night, Marie Griffis received a phone call that Kim Picazio, unbeknownst to her, was on an HLN talk show without Crystal Sheffield, discussing some of the extremely sensitive information that had been released by law enforcement earlier in the day.

On yet another occasion, as Marie Griffis was being administered a Layered Voice Analysis Test, Crystal Sheffield, Kim Picazio and Peggy Cone, Lead Detective on the HaLeigh Cummings Case stepped outside to smoke a cigarette. Detective Cone told Kim Picazio that she could no longer disclose information to her. Detective Cone stated that it had become a problem to discuss the case with Kim Picazio because whatever Cone disclosed to Picazio ended up on the internet.

Kim Picazio developed a close relationship with a number of online bloggers and began blogging herself. Unlike Miss Picazio's characterization that she or her staff was just monitoring the internet for rumors, she was very involved in the online crime board community. Kim Picazio used the screen name JERICO on Websleuths and posted semi-regularly. She also used this name on a private social forum named the Garden. Her staff not only monitored, but posted on other crime forums also. Electronic records are available upon request.

Kim Picazio befriended a number bloggers. One such blogger that Kim Picazio befriended was Kendall Clark aka Pirate from Websleuths and the Garden. According to Kendall Clark's statement, which is included as Exhibit A, very sensitive information was being leaked by Kim Picazio to be posted on the internet by herself, and two other bloggers Karen Devine-Spruill and Tammy Spratt.

Following is an excerpt from Kendall Clark's statement explaining the type of relationship she had with Kim Picazio and the depth of involvement Kim Picazio had with the online community.

However by the end of April I began to grow concerned with the nature of the information Kim often shared with Karen and me. At times I felt flattered that she trusted me, but more and more I was concerned that Kim should not be handing out information that included the names of potential witnesses in a missing child case. I knew that Kim talked with other people who were active on the internet and was fairly certain that she was sharing information as freely with these other people as she had with me.

RESPONSE TO KIM L. PICAZIO
FILE NO.: 2010-50,286 (1711)

The Rules of Professional Conduct 4-1.6 (a) Violations

Kim mentioned that she wanted to have as many bloggers as possible contact Bonnie Warner at Florida's Department of Children and Families to exert pressure to remove Ron Cummings Jr. from the custody of his father. She tossed out names of people with whom Ron Cummings was known to deal drugs and details about their statements to her investigators and to law enforcement.

Kim also wanted me to post defamatory information about John Merchant, a detective with the Putnam County Sheriff's office on Websleuths. She claimed that this detective was caught with cocaine in his personal vehicle in 2008 and was not punished beyond two weeks of desk duty. She also claimed that Mr. Merchant had been caught in possession of a boat that belonged to a drug dealer who he sent to prison. Kim claimed that Detective Merchant was helping HaLeigh's father, Ron Cummings continue to evade prosecution for his role in HaLeigh's disappearance. I had no desire to subject myself to a libel case and therefore declined to post the information about John Merchant.

Miss Picazio also took an especially aggressive stance toward Ron Cummings' attorney at the time, Greg Kimball. She told me that Kimball was known to use crack cocaine, engage in parties with prostitutes, and that he was likely involved in the drug trade with Ron Cummings. She also told me that his nickname on the streets of Putnam County is "Crackhead" Kimball and that he had a condominium on the waterfront in Palatka in which he hosted drug and sex parties. Kim and her private investigator, William Cobra Staubs both pressured me to share this information online.

Kim had a close relationship with a Bounty Hunter/Private Investigator named William "Cobra" Staubs. They were longtime friends and were working on HaLeigh's case together. Many times Kim called me when she was with Cobra and we would have three way conversations utilizing her cellular speaker phone. There were many times she called late at night and I assumed that she and Cobra were intoxicated because of their conduct. Around the middle of May Kim and Cobra had a falling out that resulted in an acrimonious war of words over the internet. One afternoon, Kim contacted me and she was extremely upset that Mr. Staubs/Cobra had recorded her discussing an extra marital affair she was having with a young man who worked at the Haleighbug Center named Jeremiah Reagan. She told me that one night when she was spending the night in a hotel room with Jeremiah in Palatka that Cobra called Kim's husband to report that this was happening and that he drove to Putnam County from Ft. Lauderdale and caught Kim in the hotel room with Jeremiah.

RESPONSE TO KIM L. PICAZIO
FILE NO.: 2010-50,286 (1711)

The Rules of Professional Conduct 4-1.6 (a) Violations

Kim was angry and upset and determined to exact revenge on Cobra for telling her husband about her affair with Jeremiah. She wanted to share some of Cobra's embarrassing personal information online and as I did with the information about John Merchant, I refused to participate. Shortly after this conversation with Kim, a man called my house and told me that he had information that could be used to damage Cobra and a reporter from Minnesota with whom Cobra was working named Tim Holmseth. I hung up on this caller and told Kim to never have anyone call me like that again.

My continued refusal to disseminate negative information about Kim's foes resulted in our relationship becoming strained. The final incident that resulted in my breaking ties with Ms. Picazio and Karen Devine was when Ms. Devine abused her privileges as a moderator at Websleuths in order to prevent Crystal Sheffield and her family from learning that Kim was spreading false information on the internet.

A story began to circulate that HaLeigh's father, Ron Cummings was planning to take HaLeigh's brother Ronald Jr. to Central America over the summer. I contacted Kim to see if this was true and she replied that Ron Cummings did request to take the child out of the country but that she was not going to allow it. She gave me permission to post this on Websleuths.... A day later, on June 8 Marie Griffis contacted me through private message at Websleuths to tell me that Ron Cummings never requested to take Ron Jr. out of the country. I apologized profusely to Marie and told her I would be glad to share the e mail with her in which Kim Picazio stated that he did make this request. Within hours Kim was leaving angry voice mails at my home questioning my loyalty to her. The next day I severed my relationship with Kim Picazio, Karen Devine-Spruill and Tammy Spratt in an e mail informing them how disgusted I was with the way they were treating the case and family of a missing child.

In the original complaint, there were exhibits attached that demonstrated the types of information that were disseminated by Kim Picazio. Electronic Records available upon request.

Marie Griffis told Kim Picazio on many occasions to cease speaking to the general public and the news media. Marie Griffis also told Kim Picazio to cease posting information on the internet and to stop disseminating information to bloggers. Kim Picazio did not stop these activities.

RESPONSE TO KIM L. PICAZIO
FILE NO.: 2010-50,286 (1711)

The Rules of Professional Conduct 4-1.3 Violations

The Rules of Professional Conduct 4-1.3 Diligence states *lawyer shall act with reasonable diligence and promptness in representing a client.*

Kim Picazio has not acted with reasonable diligence in the operation of the Haleigh Bug Center and Trust that was supposed to be created in April 2009.

In March 2009, Marie Griffis' bank, Country Federal Credit Union created a raffle for a 1999 Ford Ranger 4 x 4 with proceeds to be split between Marie Griffis and another bank customer beneficiary. Money for both families was to be used towards living expenses during a personal crisis. Marie Griffis did not initiate this fundraising event.

Proceeds from the raffle were $3,000. Marie Griffis kept receipts for her expenditures applied against the raffle money donations. The majority of the money went for fuel, supplies and buying HaLeigh t-shirts. This money was not donated to the HaLeigh Bug Center at all. It was a separate fundraiser that was held before the creation of the HaLeigh Bug Center or Foundation. All money was accounted for and Marie Griffis will be claiming the income on her personal 2009 tax return. Any correspondence concerning the receipts or records of this fund raiser, which Kim Picazio has referred to, is not affiliated with the HaLeigh Bug Center or Foundation. A statement from bank Country Federal Credit Union can be provided upon request.

Marie Griffis did open a bank account for the proceeds of the raffle and for a donation drive from coworkers. None of these donations were made to the HaLeigh Bug Center or Foundation.

In addition, Kim Picazio mentions an email where Marie Griffis states that she disbursed the remaining $1,400 from the raffle and $217 in donations to Crystal Sheffield. The $217 was the amount of two cash donations that were given before the HaLeigh Bug Center was opened. None of the monies described in the email that Kim Picazio mentions in her response were donations to the HaLeigh Bug Center or Foundation.

RESPONSE TO KIM L. PICAZIO
FILE NO.: 2010-50,286 (1711)

The Rules of Professional Conduct 4-1.3 Violations

At the beginning of March 2009, Wayanne Kruger was introduced to Crystal Sheffield and Marie Griffis by Reverend Richard Grund in Satsuma. Kruger, a self described Child Advocate, began to make suggestions to Sheffield and Griffis concerning ways that they could keep "awareness" up for the search for HaLeigh. She suggested that they sell HaLeigh t-shirts and get flyers printed up for distribution to keep HaLeigh's image in the media. She also suggested putting out donation buckets to help with living expenses and to fund these "awareness" projects. The donations that Kim Picazio refers to when she became involved in the case mainly centered around these "awareness" projects. Instead of waiting passively for the return of HaLeigh, the family actively became involved in the search by trying to raise "awareness".

In reading Kim Picazio's response, Crystal Sheffield and Marie Griffis became aware the HaLeigh Bug Trust was never properly set up. They will amend their statement to reflect that fact. Kim Picazio stated that the Trust was never created because the family could not agree on a Trustee. In fact, Marie Griffis stated that she would be the Trustee, but was informed that a family member could not hold the position. The Sheffield/Griffis family assumed that Kim Picazio had filled the position of Trustee and that the Trust was indeed legally established.

Picazio consulted with and hired an attorney named Brian Page who is a Trust Attorney with the firm Greenspoon Marder out of South Florida. She stated that she would set up a Trust Account with a local bank to serve the HaLeigh Bug Trust. It has now come to Crystal Sheffield and Marie Griffis' attention that this was never completed.

On or about the second week of April 2009, Kim Picazio set up the Haleigh Bug Center and stated that she would set up a trust account for donations to contribute to Crystal Sheffield's living expenses and HaLeigh Cummings awareness projects. The Haleigh Bug Center was Kim Picazio's idea and sole creation. Kim Picazio stated that they needed a command center. Marie Griffis did not understand why this was necessary as they lived a long distance from Satsuma and could not be there daily to run the center.

Kim Picazio secured the building that housed the HaLeigh Bug Center and paid for minor upgrades before opening up. All of the utilities were set up by Kim Picazio. All of the bills and utilities, with the exception of one month's rent was paid for by Picazio or her husband. Crystal Sheffield and Marie Griffis had no managerial or administrative involvement in the HaLeigh Bug Center at all.

RESPONSE TO KIM L. PICAZIO
FILE NO.: 2010-50,286 (1711)

The Rules of Professional Conduct 4-1.3 Violations

Kim Picazio secured Jeremiah Regan to run the Haleigh Bug Center. Crystal Sheffield and Marie Griffis did not request Jeremiah Regan to run the Center. Jeremiah Regan reported to Kim Picazio and William (Cobra) Staubs, a private investigator and personal friend of Kim Picazio's. All expenditures were to be tracked with a receipt and every donation would be noted. Kim Picazio stated that everything given to the Haleigh Bug Center and the family, included cash donations and gifts would be noted. Jeremiah Regan did keep the accounting records for the HaLeigh Bug Center and showed the financial records for March and April 2009 to Crystal Sheffield and Marie Griffis when they were visiting the HaLeigh Bug Center. Sheffield and Griffis were not at the HaLeigh Bug Center on a regular basis and do not know where these records are now located.

Jeremiah Regan was given all donations, unless checks were personally made out to Crystal Sheffield. Checks made out to Crystal Sheffield were deposited in her personal account and will be claimed on her 2009 tax return. The only funds that Crystal Sheffield received from HaLeigh Bug Center donations was approximately $350. Sheffield received the funds for living expenses and supplied receipts for those expenses. Jeremiah Regan was the person who disbursed the funds to Crystal Sheffield.

Marie Griffis has not received any funds from the HaLeigh Bug Center donations.

Crystal Sheffield and Marie Griffis were not aware of any of the actual administration of the HaLeigh Bug Center, nor were they given regular access to any banking records. Jeremiah Regan stated to Crystal Sheffield that he had turned over a record book to Kim Picazio of donations received. Crystal Sheffield and Marie Griffis have not seen the final record book and have no knowledge of the amount of donations that were received or how they were disbursed.

There were other individuals chosen to run the Haleigh Bug Center for a period of time, but Crystal Sheffield and Marie Griffis were not included in personnel decisions. Kim Picazio made all executive decisions for the Haleigh Bug Center. In the original complaint, there was an exhibit containing information that Kim Picazio told an internet blogger about her involvement in the running of the Haleigh Bug Center.

At the urging of Crystal Sheffield and Marie Griffis, the Haleigh Bug Center was scheduled to be shut down in June 2009. All contents were scheduled to be moved to the Griffis property in Baker County, Florida. The actual move occurred two weeks earlier than scheduled, but it was not an unexpected action. All of the contents of the HaLeigh Bug Center had been donated and were properly transferred to the new location.

RESPONSE TO KIM L. PICAZIO
FILE NO.: 2010-50,286 (1711)

The Rules of Professional Conduct 4-1.3 Violations

In response to Kim Picazio's allegations that there were many fights about the donation proceeds, Crystal Sheffield and Marie Griffis deny that allegation. There were legitimate questions raised by Crystal Sheffield and Marie Griffis concerning donations received by Jeremiah Regan, William (Cobra) Staubs) and Debbie Huddleston and how that money was accounted for. Those legitimate questions remain to this date.

Kim Picazio also arranged to set up the HaLeigh Bug Website. Contrary to Kim Picazio's allegations, it was Picazio herself that suggested the PayPal link be placed on the web page for the sales of tee shirts or bracelets to people from out of town. Crystal Sheffield and Marie Griffis had no knowledge of how to set up a PayPal button on a website.

The last mention that Kim Picazio makes is to a Benefit Concert for HaLeigh that was being set up by a singer in Austin. This singer contacted Marie Griffis and offered to put on a concert for the HaLeigh Bug Foundation. In Lieu of any donations being received by the HaLeigh Bug Foundation, Marie Griffis has arranged for all money to be disbursed directly to Putnam County Sheriff's Office, Texas EquuSearch and the Justice Coalition reward fund for HaLeigh. No monies will be distributed through the HaLeigh Bug Foundation.

Crystal Sheffield and Marie Griffis continue to assert that Kim Picazio has not acted with reasonable diligence in her failure to file for suspension of further child support obligations. With HaLeigh Cummings missing and Crystal Sheffield suffering seizures and unable to work, Crystal Sheffield's child support obligations should have suspended or at least reduced. Crystal Sheffield turned over a copy of her doctor's note verifying her inability to work or drive. A copy of this note is included in the original complaint.

RESPONSE TO KIM L. PICAZIO
FILE NO.: 2010-50,286 (1711)

Under penalty of perjury, I declare the foregoing facts are true, correct and complete.

Crystal Sheffield — 10-7-09
Signature — Date

Marie Griffin — 10-7-09
Signature — Date

RESPONSE TO KIM L. PICAZIO
FILE NO.: 2010-50,286 (1711)

EXHIBITS:

Exhibit A – Statement of Kendall Clark

My involvement with Kim Picazio began on March 23, 2009. I had been following the case of missing child, Haleigh Cummings since February 10 when the Amber Alert was issued. The home from which Haleigh disappeared is only about 30 miles from where I live and I paid special attention to the search for this little girl. At the time I participated in an internet crime forum called Websleuths (www.websleuths.com). At no time was I an administrator or moderator at this forum. I was simply a posting member.

A person posting as "Player" claimed to be a former neighbor of Haleigh Cummings. He said he was an elderly man and seemed to know a great deal about the day to day activities of HaLeigh's family. I had genuine concerns that he might be involved in HaLeigh's disappearance and felt that the authorities needed to investigate this person. Because of the nature of the internet, I hesitated to contact the authorities because I was not sure I would be taken seriously. In the meantime, Kim Picazio began representing HaLeigh's mother Crystal Sheffield. I watched several media interviews and noticed that Ms. Picazio seemed to be someone who might understand my concerns about the internet poster so I took a chance and e mailed her the evening of March 23. I received a prompt and positive response to my concerns and a regular correspondence began.

Originally I shared suspicious and interesting internet comments with Kim and occasionally asked her questions about information that was being posted on Websleuths. Kim was often willing to rebut negative information about HaLeigh's mother Crystal with detailed facts. As someone who firmly believed that HaLeigh's mother and her family were not at all involved in her disappearance, I was pleased to get the "truth" out for Kim.

On April 6 a moderator by the name of Top Gunner (aka Karen Devine) from Websleuths asked me for Kim Picazio's contact information and e mailed her an introduction/verification that the information I was posting was indeed appropriate to share. Kim Picazio responded quickly and confirmed that she was providing information to post at Websleuths. From this e mail exchange, Kim Picazio and Karen Devine established a relationship. Ms. Picazio made no effort to initiate contact with any moderators or administrators at Websleuths.

RESPONSE TO KIM L. PICAZIO
FILE NO.: 2010-50,286 (1711)

EXHIBITS:

Exhibit A – Statement of Kendall Clark

In the first weeks I continued to feel that I was helping. However by the end of April I began to grow concerned with the nature of the information Kim often shared with Karen and me. At times I felt flattered that she trusted me, but more and more I was concerned that Kim should not be handing out information that included the names of potential witnesses in a missing child case. I knew that Kim talked with other people who were active on the internet and was fairly certain that she was sharing information as freely with these other people as she had with me. Kim mentioned that she wanted to have as many bloggers as possible contact Bonnie Warner at Florida's Department of Children and Families to exert pressure to remove Ron Cummings Jr. from the custody of his father. She tossed out names of people with whom Ron Cummings was known to deal drugs and details about their statements to her investigators and to law enforcement. Kim also wanted me to post defamatory information about John Merchant, a detective with the Putnam County Sheriff's office on Websleuths. She claimed that this detective was caught with cocaine in his personal vehicle in 2008 and was not punished beyond two weeks of desk duty. She also claimed that Mr. Merchant had been caught in possession of a boat that belonged to a drug dealer who he sent to prison. Kim claimed that Detective Merchant was helping HaLeigh's father, Ron Cummings continue to evade prosecution for his role in HaLeigh's disappearance. I had no desire to subject myself to a libel case and therefore declined to post the information about John Merchant.

Ms. Picazio also took an especially aggressive stance toward Ron Cummings' attorney at the time, Greg Kimball. She told me that Kimball was known to use crack cocaine, engage in parties with prostitutes, and that he was likely involved in the drug trade with Ron Cummings. She also told me that his nickname on the streets of Putnam County is "Crackhead" Kimball and that he had a condominium on the waterfront in Palatka in which he hosted drug and sex parties. Kim and her private investigator, William Cobra Staubs both pressured me to share this information online.

I took a two week vacation between April 25 and May 7 and upon my return learned that Kim had taken another Websleuths member into her confidence, a woman named Tammy Spratt (aka BadMe) from Canada. I expressed my concerns to Kim about this person as she had never made a secret of the fact that she suffered from neurological and mental problems.

RESPONSE TO KIM L. PICAZIO
FILE NO.: 2010-50,286 (1711)

EXHIBITS:

Exhibit A – Statement of Kendall Clark

Within a couple weeks of my return from vacation, my concerns grew and my respect for Kim Picazio deteriorated for several reasons as listed below:

Kim had a close relationship with a Bounty Hunter/Private Investigator named William "Cobra" Staubs. They were longtime friends and were working on HaLeigh's case together. Many times Kim called me when she was with Cobra and we would have three way conversations utilizing her cellular speaker phone. There were many times she called late at night and I assumed that she and Cobra were intoxicated because of their conduct. Around the middle of May Kim and Cobra had a falling out that resulted in an acrimonious war of words over the internet. One afternoon, Kim contacted me and she was extremely upset that Mr. Staubs/Cobra had recorded her discussing an extra marital affair she was having with a young man who worked at the Haleighbug Center named Jeremiah Reagan. She told me that one night when she was spending the night in a hotel room with Jeremiah in Palatka that Cobra called Kim's husband to report that this was happening and that he drove to Putnam County from Ft. Lauderdale and caught Kim in the hotel room with Jeremiah.

Kim was angry and upset and determined to exact revenge on Cobra for telling her husband about her affair with Jeremiah. She wanted to share some of Cobra's embarrassing personal information online and as I did with the information about John Merchant, I refused to participate. Shortly after this conversation with Kim, a man called my house and told me that he had information that could be used to damage Cobra and a reporter from Minnesota with whom Cobra was working named Tim Holmseth. I hung up on this caller and told Kim to never have anyone call me like that again.

My continued refusal to disseminate negative information about Kim's foes resulted in our relationship becoming strained. The final incident that resulted in my breaking ties with Ms. Picazio and Karen Devine was when Ms. Devine abused her privileges as a moderator at Websleuths in order to prevent Crystal Sheffield and her family from learning that Kim was spreading false information on the internet.

RESPONSE TO KIM L. PICAZIO
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My goal in contacting Kim was to help. The moment I learned I was creating problems for the people I wanted to help, I ceased contact with her and hoped that she would simply leave me alone. Instead, I have been subject to harassment via middle of the night phone calls, having my personal information (including full name, address, phone number, husband's name, child's name, employer) shared with strangers all over the internet. The only person who knew the specifics of my personal information was Kim Picazio and I hold her responsible at the very least for sharing my information and at worst using and encouraging others to use this information to harass and stalk me.

I have several e mails that will support the comments made in this statement. All will be made available upon request.

LAW OFFICE OF
KIM L. PICAZIO, P.A.
ATTORNEY AT LAW

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KIM L. PICAZIO
FAMILY AND MATRIMONIAL LAW
COMMERCIAL LITIGATIOIN
GENERAL CIVIL PRACTICE

October 28, 2009

THE FLORIDA BAR
RECEIVED
OCT 30 2009
ACAP
TALLAHASSEE, FLORIDA

Shanell M. Schuyler, Bar Counsel
The Florida Bar
651 East Jefferson Street
Tallahassee, FL 32399-2300

Re: Crystal Sheffield: The Florida Bar No.: 2010-50, 286 (1711)

Dear Ms. Schuyler:

Thank you for opportunity to provide the Florida Bar with a Sur-Reply to the Response filed by the Complainants, Crystal Sheffield and her mother, Marie Griffis. The allegations contained in this Inquiry have shocked me, an attorney who volunteered thousands of hours of pro-bono time, and tens of thousands of dollars in costs and expenses, to support and assist the mother of a missing child. The investigation of missing child Haleigh Cummings has created a nationwide obsession, and it continues to be a prime topic in local and national news, and internet crime news sites. See attached News Article from Orlando Times Union on the Haleigh Cummings Obsession.

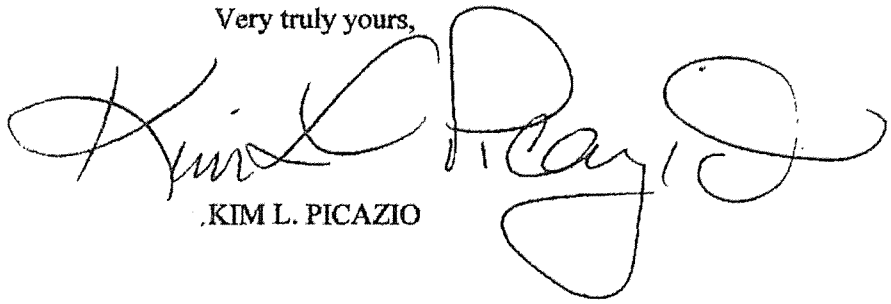
Unfortunately, many fine individuals have suffered tremendous personal attacks in their well-intentioned efforts to assist the Sheffield and Griffis family. Many members of my staff, as well as volunteer team members who donated hundreds of hours to protect and assist Crystal Sheffield, have suffered libelous attacks on their reputations by internet bloggers, and avant guard journalists. When I saw that a blogger named Kendall Clark had attached an affidavit to Ms. Sheffield's Response in this matter, I could not help by shake my head. It is widely known that Ms. Clark is writing a book about the disappearance of Haleigh Cummings, and I had always attempted to protect my client from these types of self-serving intruders who would befriend the family, or me, only to be secretly feeding a hidden agenda for fame, fortune, or the notoriety. From the inception of the Haleigh case, scheming bloggers have sought the coveted "inside scoop", attempting to befriend family members, journalists, and law enforcement officers. One blogger even convinced Marie Griffis, mother to Crystal Sheffield, that she was her Husband's extended family member, only be discovered after blogging inside information on the internet. It is sad to me that a family that I sought to protect with all my might and my wit, has fallen into this trap of what I, and many other individuals on my staff, tried desperately to prevent.

I have never worked so hard to defend a client in my entire career. At no time during my representation of Crystal Sheffield did I breach the Rules of Professionalism, which I so firmly adhered during the course of my role as lawyer, and spokesperson. In fact, it was my strong and unwaivering compliance with the Rules of Ethics, that ultimately alienated me from my client, and her family.

As for me, I am proud to say that I stood firm by my Oath to this Bar, and regardless of reputation attacks I suffered, most notably by my client's mother, Marie Griffis. I refused to stray outside the boundaries of ethics and integrity, specifically, by refusing allege false allegations to a Florida court by filing a custody proceeding for a Mother struggling with a drug problem.

With great sadness, I am forced to defend against my own client to this Bar, revealing facts about her that no one should ever hear or know, due to the fraudulent allegations contained in this Inquiry. I hereby address the allegations by Crystal Sheffield, Marie Griffis, and blogger, Kendall Clark a/k/a *Pirate Girl* in this Sur-Reply.

Very truly yours,



KIM L. PICAZIO

cc: Crystal Sheffield
Marie Griffis

news jacksonville.com

Haleigh Cummings mystery feeds online obsession

Local stories like Haleigh's become national fixations when observers with opinions take rants to the Web.

BY DANA TREEN STORY UPDATED AT 10:36 AM ON WEDNESDAY, OCT. 21, 2009

Twitter feeds, blogs related to Haleigh

haleighnewz Texas engineer Ellen Johnson created this account in support of Haleigh's mother.

hereforhaleigh A gathering spot of advocates for Ronald Cummings, Haleigh's father.

camille_2010 Wisconsin mom Kathy Schmidt says family hasn't been asked tough questions.

HopeforHaleigh Recent comments defend Ronald Cummings but ask the focus be on the search.

crystal0430 The Twitter account of Crystal Sheffield, Haleigh's mother.

artharris.com Emmy-winning journalist Art Harris reports on Haleigh, other cases.

Prayers4Haleigh With a middle of the road approach, this account tries to keep focused on the search.

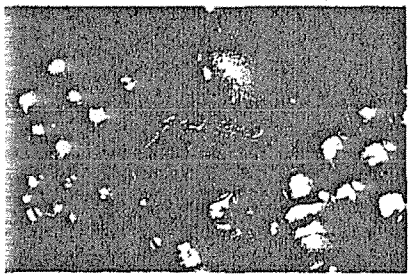
haleighside An anonymous Florida-based account supportive of Haleigh's father.

scaredmonkeys.net Crime and current events blog lists Haleigh as high-profile missing persons case.

Stephww.wordpress.com Courts and crime broadcast journalist Steph Watts covers Haleigh, other cases.

Marie1207 Twitter account of Haleigh's grandmother and mother of Crystal Sheffield is oriented toward Scripture quotations.

Haleigh Cummings photo gallery



Haleigh Cummings 911 call

The disappearance of 5-year-old Haleigh Cummings eight months ago occurred about the time Ellen Johnson got Internet access at home in east Texas.

"I didn't even have a computer in my house until just before this," she said.

Now, the 46-year-old petroleum engineer has a Twitter account called haleighnewz dedicated to the case and at summer's end, was in Putnam County to help with a school supply drive for Haleigh's classmates. Johnson met Haleigh's mother, Cryst Sheffield, and grandmother Marie Griffis there. She spends hours sharing her thoughts online and probing for information about the ongoing investigation.

It is as if the Internet has removed a wall.

Johnson is not alone. In the eight months since the kindergartner disappeared from the Satsuma mobile home where she we living with a younger brother, their father and his 17-year-old girlfriend, Misty Croslin, Haleigh has touched legions of hearts and spawned international attention in an online community.

Johnson says her attraction to the case is not something she understands completely. She had never posted on an online forum but is now immersed in Haleigh's story.

"You are interacting with the people themselves," she said. "There is not that distance between them and you."

Johnson said she is not married and has no children but was struck by the plight of a mother without her child.

"On some level I felt compassion for them," she said.

Steph Watts, a broadcast producer and journalist who has worked for Court TV, CNN and Fox and followed crime and justice stories, said there is a danger in becoming too close to a case. "We feel like we have permission and a right to be in their lives and we don't," he said.

Watts has a blog, Watts Up With This??? at stephww.wordpress.com that follows the Haleigh story.

"What the Internet has done is taken those local stories and made them national stories," he said.

Watts said he began writing about Haleigh in August.

"I think people are feeling they can become part of the story by weighing in," he said.

What has happened is not necessarily new, he said, and reactions from online observers are equivalent to earlier generations yelling opinions at the television.

"This is like a high-speed letter to the editor," he said.

Kathy Schmidt, 42, a mother of three in Madison, Wis., calls the case a "scattered puzzle."

Schmidt, who has a Twitter account, camille_2010, is scheduled to launch the Justice 4 Haleigh blog today with a friend she met online. It will be at justice4haleigh.wordpress.com.

Passion ebbs and flows in the forums, she said.

"Nobody is really in charge of anything," she said. "They just get a following."

Like Johnson, Schmidt said she had never been compelled by a case before Haleigh's.

"She didn't get treated right and she didn't deserve this," Schmidt said of the still-missing youngster.

She has an answer for her children, aged 10 to 14, when they ask her why she is so absorbed by a girl so far away that she never knew.

"I don't really see anybody fighting for Haleigh on either side," she tells them. "If it was you, I'd want someone fighting for you. Haleigh didn't just walk out of that trailer for the rest of her life."

It is as if these people can reach through their computer screens to ease the pain of Haleigh's family or nudge a detective's shoulder to prod them forward.

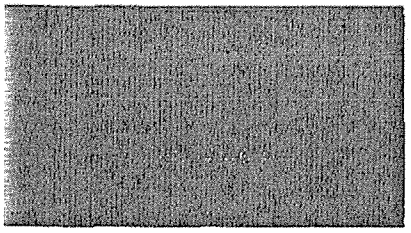
They e-mail the cops and politicians when investigations seem to sputter and urge state child safety workers to check the welfare of Haleigh's younger brother, said Chantell Wofter, 44, of Southern Ohio. She created her crwofter1 Twitter account because of the case.

"I feel close to the investigation," she said, one time even calling the FBI. "If there is a search or something is going on, I hear about it first."

Since Feb. 10, detectives and analysts have tried to crack the mysterious disappearance. They remain unconvinced that Croslin, who became Haleigh's stepmother after marrying 25-year-old Ronald Cummings in March, is telling all she knows.

But while searches, the Cummings' already dissolved marriage, standoffs by both Haleigh's parents and unrelated arrests of family members and others are strong fodder, they are not all that drives the story, said Art Harris, whose blog The Bald Truth at artharris.com gives her prominent coverage.

"There is something about Haleigh's picture," he said of the girl whose often-used image shows her with a bright smile and a pink bow in her hair.



00:00 02:04

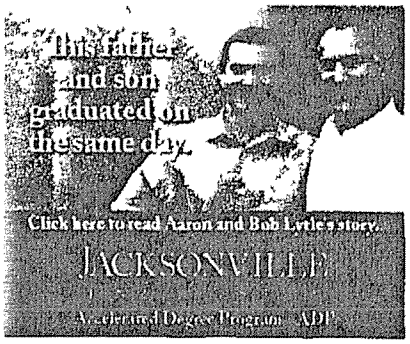
The search continues
Haleigh Cummings Putnam Cookout
Haleigh Cummings One Month Anniversary
Haleigh Church Service
Volunteers Search For Haleigh
Ronald Cummings Appeal for Missing Daughter

Related coverage

» **JAIL INMATES:** Learn more about everyone arrested in Duval County in the last 31 days
» **HOMICIDES DATABASE:** Learn more about Duval County's homicides since 2004 in a searchable database
» First Coast Fugitives
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» 'Give me my baby back,' pleads mother of missing Orange Park girl Somer Renee Thompson
» Ronald and Misty Cummings' divorce goes through
» Misty Cummings robbed with friends, 1 says they were there to buy drugs
» Search for Somer Renee Thompson continues into the night
» Somer Thompson's father: Birthmark on body found in landfill matches daughter's



"She is so winning," he said. "Just by looking at the pictures regardless of how you feel about her parents, she is an innocent."

Harris' posts are often biting and most likely focus on Ronald or Misty Cummings. Harris describes his coverage as "calling it the way you see it." He is regularly interviewed by cable television's Nancy Grace.

"My challenge is how do you get behind the motives and the reasons behind it," he said.

Lt. Johnny Greenwood of the Putnam County Sheriff's Office said bloggers Harris and Watts check information and have not caused heartburn for investigators.

"The only thing that is really discouraging is those bloggers who have bad information," he said.

Some hide behind online anonymity, he said.

"We don't know who they are. People take what these people say as gospel."

The Internet can offer a measure of secrecy but is still within the reach of the law, said Rick Karcher, a torts law professor at Florida Coastal School of Law.

Opinions are not illegal but the First Amendment does not protect against false, defamatory statements, he said.

"It's from the perspective of the reader," he said. "Would they think it is true?"

While the case has gripped a divided online following that casts public accusations about such troubled families, to Haleigh's relatives, much of the attention is a bombardment that puts them on the defensive.

"It just consumes too much of your time to continue to sit and try to keep up with who is saying what," said Griffis, who lives in Baker County. "I think they're irrelevant. Half of their information isn't true."

Now, she said, she limits her involvement to posting Scripture. Those who think they have a lead in the case need to contact detectives, she said.

"If it is someone I've become familiar with, I'll answer them, but nine out of 10 times I don't," she said.

Ronald Cummings' grandmother, Annette Sykes, lives in southern Putnam County and said her family has found support but also suffers sharply from the commentary.

"There's not much you can do," she said. "They are going to believe what they want to believe or say what they want to say."

dana.treen@jacksonville.com, (904) 359-4091

User Comments



Tell you what
Submitted by RetiredJSO on Tue. 10/20/2009 at 8:55 am
Quit reporting on this subject and people will quit posting comments.

Login Or Register To Post Comments Flag As Offensive



Haleigh Cummings
Submitted by 380lady38 on Tue. 10/20/2009 at 9:53 am
If Ronald called his house 20 times and got no answer, why didn't he call 911??? It just doesn't add up!

Login Or Register To Post Comments Flag As Offensive



Haleigh Cummings
Submitted by jacReader on Tue. 10/20/2009 at 12:06 pm
All the bloggers, tweaters or forum chatter isn't doing anything to find Haleigh, it's all for gossip entertainment

Login Or Register To Post Comments Flag As Offensive

SUR-REPLY BY KIM L. PICAZIO TO RESPONSE FILED BY COMPLAINANT(S)
FILE NO.: 2010-50,286 (1711)

I. LEGAL REPRESENTATION OF MARIE GRIFFIS

I did not represent Marie Griffis, and surely a lawyer's close contact and well-intentioned updates on the status of a family member's case, does not trigger an attorney client relationship with an entire family. The Complaint seeks to extend my legal representation of Crystal Sheffield to her mother, Marie Griffis, for the purpose of manufacturing or bolstering alleged Bar Rule violations. Proof of the scope of my legal representation can be demonstrated from Crystal Sheffield's own words in media appearances, and from the various interviews I did during my tenure as spokesperson and lawyer for Crystal Sheffield. In each appearance, both Crystal and I represented that I was a spokesperson and lawyer for Crystal, and Crystal alone. Members of my staff, members of the Putnam County community, representatives from Department of Children and Families, lead detectives of the Haleigh Cummings Task Force at the Putnam County Sheriff's office, and well-respected journalists, would agree that at no time did I ever hold myself out to the public as representing Marie Griffis, Crystal's mother.

Of course, on many occasions, I discussed the status of the case with my client's family, as I customarily do in other cases for clients who have concerned extended family members. However, in no way does this relationship with family members create a bonafide attorney client relationship with them. Further, there were many occasions wherein Crystal specifically asked me to withhold confidential information and facts from her Mother and other family members, which I did. Supporting Documents and Witnesses Upon Request. Quite simply, I did not give any legal advice to any individual other than Crystal.

There are several Sheffield family members and staff members who could testify to the fact that I had specifically, and more than once, informed Marie Griffis that I represented Crystal, and Crystal alone. Witnesses: William E. Staubs, Jeremiah Regan, Donna Wagoner, Marty Sheffield (Crystal's Father), Connie Sheffield (Crystals' Step Mother), Detective Peggy Cone of PCSO, and Jerri Green.

II. RULE 4-1.6(A) PROPER DISCLOSURES WITHIN SCOPE OF REPRESENTATION

A. *THE ROLE AND DUTIES OF A MEDIA SPOKESPERSON*

The internet is essentially where a growing number of the general public gets their news every day. I received thousands of emails from the public commenting on the Sheffield/Haleigh Cummings matter, some of which even told me how to better put on my make-up. The public sent tips, leads, support, well-wishes and sometimes screaming insults, my way. As the spokesperson for Crystal Sheffield, the release of positive information to the public, whether on the internet, or to other media sources, in furtherance her best interest or desired results, does not constitute a violation of the Rules of Professional Conduct. The very nature of the role of a "media spokesperson" is different in kind than

most other roles customarily served by an attorney. It requires the disclosure of information customarily thought of as "off limits" to the public and/or your opponents. This job requires more than showing up at media interviews. It requires complex strategy, intelligent calculation, finding and maintaining inside sources for information, and trusted contacts who can be your eyes and ears for the "feel" of the public. Damning information about a client that is swirled around the Internet will surely be aired in national headlines, and can devastate your client's image, credibility, case or cause. During the case, I utilized a media consultant, two-time Emmy winning journalist, Art Harris (formerly of CNN). Harris assisted Crystal and my team, lending us his expertise and advice on the strategic placement and release of information to turn around the negative press Crystal was receiving. Crystal and I spent a great deal of time with Art Harris.

The release of information, or breaking news, in a high media case, must be preplanned, time-sensitive, and intentional. A surprising release of damning information from your opponents is the last thing you've ever want to happen. Disclosures of information are aimed at directing, or redirecting, the media so that they air positive information about your client. Ronald Cummings' lawyers released damaging information about Crystal through press releases throughout the case. It was imperative that we kept key contacts in law enforcement, the community, the media, as well as on the internet, to properly counter many unflattering stories which could have destroyed Crystal's credibility and chances of ever having custody of her children. Quite simply, guiding, directing and dodging the release of information from your client's detractors, is an intensely calculated process in a high media case.

There have been numerous stories that have aired in the Haleigh Cummings/Sheffield matter from internet sources. Insidious bloggers can be devastating to a client in modern-day high media cases. Often fanatical about missing children's cases, bloggers spend countless hours "sleuthing" information about all people connected to the case, call and write to authorities with rumors for false tips, and try to become personally close with insiders or family members involved in the case. The most coveted information source for a blogger is to obtain insider information directly from a family member in a case. This manipulation is exactly what I attempted to protect my client from. Unfortunately, the Sheffield/Haleigh Cummings matter is a prime example of the intrusion and disruption caused by modern-day, fanatical bloggers, who go to great lengths for an "inside scoop" in high media cases. The internet and manipulative bloggers was, and remains, a hurdle to contend with in the Haleigh Cummings case by all involved.

There have been countless news articles on the subject of the internet frenzy that plagues the Haleigh case and investigators. The Haleigh Cummings case is the most active criminal investigation blogged about on the internet to date, other than the Caylee Anthony matter. Although I was surely not obsessed with blogging, the internet frenzy was a very real fact and hazard that existed in the case. At all times, my staff and I contended with the issue properly.

B. THE COMPLAINT FAILS TO ALLEGE A VIOLATION OF RULE 4-1.6

The Complainants have failed to bring forth a single example of improper disclosures in violation of the Rules. I have never divulged information that was defamatory to Crystal Sheffield, or leaked her confidential information in any way. Further, all information released to any public source, whether on television, radio, internet or newspaper, was well within the proper scope of my retention as spokesperson for the client.

Rule 4-1.6 states that "a lawyer shall not reveal information relating to representation of a client ***except as stated in subdivisions (b), (c), and (d),*** unless the client gives informed consent." {emphasis added} Pursuant to Section (c) of Rule 4-1.6, a lawyer may reveal such information to the extent the lawyer reasonably believes necessary to serve the client's interest unless it is information the client specifically requires not to be disclosed. The Rule further provides that an attorney may reveal such information to the extent the lawyer reasonably believes necessary to comply with the Florida Rules of Professional Conduct. The Official Comment to the rule states in pertinent part:

A lawyer is impliedly authorized to make disclosures about a client when appropriate in carrying out the representation, except to the extent that the client's instructions or special circumstances limit that authority. In litigation, for example, a lawyer may disclose information by admitting a fact that cannot properly be disputed or in negotiation by making a disclosure that facilitates a satisfactory conclusion.

During my representation of Crystal Sheffield, I made many disclosures about her, or the status of the case, when I felt it appropriate to further a satisfactory or desired result for her. Such disclosures are proper and expected under the Rules of Professional Conduct. All disclosures were made by me in furtherance of Crystal's best interest, public image, and to set a better stage for her in a potential custody litigation. I achieved all of these results in the case. Crystal was often by my side on countless interviews, being asked to make similar disclosures about her personal life. Crystal's lifestyle, emotions, and past mistakes were publically discussed and debated on national television night after night. We spoke about what she should say during interviews, and when I should "take over" answering questions involving potentially damaging issues. Crystal was more "informed" by me than any client I have ever represented, and I had an entire staff that was devoted exclusively to her case. Crystal was aware of every aspect of my representation and work on her behalf, and never once requested that I cease the positive headway I was making for her month after month. Witnesses and Support Documents Upon Request.

The Rules require a client to specifically inform the attorney of the information or issue which he or she is prohibited from disclosing. I never received any request by Crystal Sheffield to limit disclosures of any subject in her case. To the contrary, I was the individual who was most protective about information leaks which could disrupt our strategies, or the investigation into the whereabouts of her missing child.

It was widely and publicly known that I was Crystal Sheffield's spokesperson for media, and all other issues, as they arose during my retention. I handled every issue, problem, and/or conflict, personal or otherwise, that arose for this Mother of a missing child. Crystal specifically declined interviews on numerous occasions, and requested members of the media contact me for comment on all issues. Several reputable media figures can confirm this fact, as well as Crystal's express expectations of the scope of my representation of her in this case. Only after I informed the family that I could not, in good faith, file for custody of her four (4) year old son, was there ever any conflict between us.

The role served by a media spokesperson is unlike other forms of representation wherein a lawyer must holds all information about his client close to his breast. In this capacity, I was specifically retained to make disclosures about my client. I was authorized and obligated to disclose information regarding my client's life, children, relationships, and emotions. The parties were involved in a high media tragedy, and "fault" and "blame" for the disappearance of Haleigh Cummings is still being discussed nationwide. Disclosures of this nature were done in the obvious effort to steer suspicions away from her as a suspect in her daughter's disappearance, raise her public image, and gain an advantage in the very public custody issues that were being televised each day on the news.

The allegation that the Complainant was not given "informed consent" regarding disclosures of information is preposterous. Whether it be medical issues, allegations of unfitness as a parent, investigations about Haleigh's whereabouts, rumors of improper handling of funds that were donated to her by the public, visitation issues with her son, media appearances, meetings with authorities, child support arrears, living arrangements, employment issues, family squabbles – I was there to support, defend, and assist Crystal in her every need. I was her personal problem solver for many months, and she was dependent on me for guidance and direction. Support Documents and Witnesses Available Upon Request.

All disclosures I have ever made regarding Crystal Sheffield have been positive, and strategically built to cast the bet positive light upon her. The Complainants have not, and will not, be able to show the Florida Bar a single incident of me saying, writing, or disclosing a disparaging utterance or innuendo regarding Crystal Sheffield. It simply never happened. Nor does the Bar Inquiry allege such. I zealously defended Crystal's privacy and reputation, and was able to quell much of the negative information that could have been reported about her life, and lifestyle. Having good relationships with key media personalities was pivotal to my ability to shine a positive light on Crystal Sheffield in the eyes of the public, and the authorities.

Nowhere in the Complaint does it site to a single example of a violation of the Rule 4-1.6 given the capacity in which I was retained. All disclosures of information were suitable, appropriate and within the scope of my role as spokesperson. This complaint is simply implausible, given the context of this case, and the media appearances made with my client by my side.

(C) COMMUNICATIONS WITH THE PUBLIC

Thousands of people in the nation are concerned about the growing epidemic of missing children in the country. The Haleigh Cummings case spiked the public's outrage about the protection of children who have gone missing from the very hands of their parents. Crystal was well aware that I personally responded to well wishers with "thank you for your support" emails, often times specifically addressing their concerns about the authorities' lack of progress in finding Haleigh, fury over the lack of an arrest in the case, and prayers for Haleigh and her mom. I often forwarded these emails to Crystal. Crystal and her family knew I felt strongly about responding personally to each of her well-wishers or retractors, and often joked that I "lived on my Blackberry". Many times, the family expressed their amazement that I was able to write back to each and every person sent support her way. On several occasions, I explained to the family and my staff that since people took time out of their day to write a long email showing their sympathy and support for Crystal and Haleigh, they deserved a personal "thank you" from us. Supporting Documents and Witnesses upon Request.

With regard to individual bloggers, I responded to their inquiries as I did with every other member of the public. I had no idea who was an insidious blogger, and who was a warm hearted well-wisher. I had sophisticated computer equipment installed, and my staff member often "caught" fishing expeditions from bloggers attempting to get an email back from me. Emails are easily edited, and on many occasions, we caught these schemes as they were being planned in chat rooms dedicated to the Haleigh case. I did get updates from my staff, but I was normally too busy with authorities, investigative work, or with the media, to sit on my computer all day. This allegation is simply illogical, and physically impossible. Kendall Clark was a particular individual who befriended me, and would often pass along credible leads or tips that I forwarded to law enforcement or DCF for further investigation. Supporting Documents Upon Request. Crystal and her family were well aware of the sharing of her information, and have become friends with her since my termination. Clark lived near the Satsuma area, had contacts in the community, and we would often discuss the tips that she herself gave to me. I would not hesitate to ask Clark, or any other community member, about their knowledge of persons of interest, local hang-outs where POI's would frequent, etc. She would often times provide a good source of information for me so that my investigators could confirm or rule out different theories in the case. Requesting information from local sources is not an improper disclosure of information by any stretch of the imagination. Further, the Putnam County Sheriff's Office has countless memos from me, founded upon on local or internet information sources, firming up or refuting various leads and tips that have become relevant and helpful to their ongoing investigation of Haleigh Cummings' disappearance.

When Clark became too obsessive with the Haleigh case, and began being banned from most reputable crime news discussion boards for misconduct, I ceased communicating with her. See Statement Executed by Websleuths Crime Forum Moderator, Karen Devine. See also, Statement Executed by William E. Staubs. Never did I share any information with Clark that was not proper, suitable, or

within the scope of my capacity as Crystal's lawyer and spokesperson. Correspondence Available upon Request.

(D) CAPTAIN DOMINIC PISCITELLO, PUTNAM COUNTY SHERIFF

The Complainant(s) specifically alleges, on page 2 of the Response, that I was chastised by Putnam County Sheriff's Office, Captain Dominic Piscitello for "blogging" information over the internet. This is outright false, and can be refuted directly by Captain D. Piscitello, who can be reached at (386) 329-0800. In a meeting I personally arranged for the family with the authorities, the Captain stated he was incensed by the internet bloggers obsession with the case, and leaks of information that he believed were by "the family". It was widely known that members of Ronald Cummings family took to the internet to slander Crystal's reputation in the eyes of the public. Capt. Piscitello never stated that he believed that I, the attorney, was responsible for such disclosures, and I had nearly daily contact with either him, or the lead detectives on the case. In fact, I have spoken with the Captain on several occasions since my representation of Crystal was terminated, remain on excellent terms with the authorities, and have provided them requested information on leads they were following in the case.

In the Response, on Page 3, the Complainant(s) allege that I released information to Marie Griffis and/or the media regarding confidential communications received by Crystal and I during a meeting with law enforcement officials. Again, Captain Piscitello can directly refute this allegation, as it is completely false. First, the release of information from law enforcement to the grandmother of a missing child is not a violation of the Rules. And I did update Marie Griffis on the status of the authorities' investigation quite frequently. There was never a disclosure of confidential information by me on the media. This would similarly not be a violation of the rule of breach of my client's confidences, however it never occurred.

The incident to which I believe the Complainants refer was a disclosure by a Private Investigator who was once paid by Crystal Sheffield during the case. Capt. Dominic Piscitello is well aware of this incident, and exactly who was responsible for the leak of information. Crystal's investigator was given information regarding the status of the investigation by me. The investigator improperly released this information to the public in a radio show. I immediately terminated him from any further dealings with Crystal, and my staff. I requested that Crystal file a complaint to the Department of Licensing against the investigator for his improper disclosures of confidential information in violation of statutes governing private investigators. To my knowledge, a complaint by Crystal was never filed. I informed law enforcement that Crystal could take action to prevent further disclosures by the investigator of confidential information he had learned by working with me. I researched the top attorneys in the area for this issue, and gave their names to Crystal in an attempt to obtain an injunction against the investigator. Crystal has yet to take any action to prevent such leaks of confidential information by the private investigator, contrary to our earlier assurances to law enforcement officials.

(E) DETECTIVE PEGGY CONE, PUTNAM COUNTY SHERIFF'S OFFICE

The Complainant(s) alleges, on page 2 of the Response, that lead Detective Peggy Cone informed me she would not continue giving information to me due to the fact she believed I was leaking the same to the internet. This statement is outright false, and can be refuted directly by Detective Peggy Cone herself. She can be reached at (386) 329-0800. I remain on good terms with Peggy Cone, and was in frequent and direct contact with her during the course of my representation of Crystal Sheffield.

On page 4 of the Response, blogger Kendall Clark, a/k/a "Pirate Girl", alleges that I had requested she put defamatory information about Detective John Merchant, PCSO, on the internet. This is false, and can be directly refuted by PCSO officials. In fact, during the course of the case, I personally called Peggy Cone and notified her of a plot by various individuals reporting on the Haleigh Cummings matter to demonstrate corruption by law enforcement. I further informed the Detective of a specific individual (identity intentionally omitted to protect criminal investigation) who wanted to tarnish the reputation of Detective Merchant by airing false information about him. Peggy Cone took a detailed report from me of this intent to defame Detective Merchant, prior to this Bar Inquiry being filed. As such, I have personally foiled a plot to do exactly what Ms. Clark claims I, myself, was attempting to accomplish. Again, Detective Cone can easily verify these events, as well as my report to her office to reveal those who were attempting to defame Detective Merchant. Upon a search of my files, however, I came upon emails from Clark who had asked me whether I believe Det. Merchant was corrupt. My response was "NO". Emails upon Request. I can also produce other emails from different individuals, wherein I explain that the information about Detective Merchant being a "dirty cop", was fraudulent and patently false. Emails upon Request. Further, I have documentary evidence from the blog forum founded by Clark, The Garden, wherein she and other bloggers were investigating Detective Merchant, pulling up his public records, and creating an appearance of impropriety. Copies of blogs from The Garden dated July 15, 2009 available upon Request.

Clark's attempt to create the fraudulent appearance of Detective Merchant's collusion with Ronald Cummings, and/or his best friend, Orlando Traylor, can be provided upon request. This effort by Clark was also reported directly to the Putnam County Sheriff's Office.

(F) ALLEGATION OF ENCOURAGEMENT TO MAKE FALSE CLAIMS TO DCF

Kendall Clark has alleged that I was interested in bloggers call in false claims to the Department of Children and Families against Ronald Cummings, father of Crystal's children. This allegation is outright perjurious and false, and I have never attempted to commit the crime of providing false information to authorities in my entire life and/or career.

Upon my retention in the case, I became aware that DCF had commenced an investigation of Ronald Cummings due to concerns about the welfare of Ronald Cummings, Jr. I met with top DCF officials in the County and the caseworker at the local DCF Office. Thereafter, I retained staff and investigators to supplement the ongoing case against Ronald Cummings, by supplying additional witnesses and

evidence of the dangers that surrounded the child in Cummings' custody. I worked very closely with DCF Caseworker, Bonnie Warner, for many months. We had nearly daily contact and communication. Ms. Warner and I collaborated on the scope and mode of witnesses that would be part of the open file investigating Ronald Cummings and Misty Croslin. We also supplied evidence and witnesses to the Sheriff's Office who was investigating the disappearance of Haleigh Cummings.

Bonnie Warner had lived in the small community of Putnam County for years, and knew just about everyone in town. False witnesses would have been irrelevant and immediately detectible due to Ms. Warner's close contacts in the community. Miscellaneous claims called in by the public were not what was being investigated by me or Ms. Warner. Further, most witnesses found by me and referred to DCF were interviewed solely by Warner, and not me, due to possible "tainting of testimony" claims. Ms. Warner invariably knew the witnesses and/or their families personally.

Due to the tremendous media coverage of the case, witnesses and evidence were carefully investigated by my team, as credibility, and lack of motive to lie, was imperative to our screening process. Those individuals who had "reason to lie" or did not have historical ties to Ronald Cummings and/or Misty Croslin prior to Haleigh's disappearance would be deemed ineffective, and wholly useless due to their lack of strong credibility. I often felt as if witnesses or evidence had to "earn" their way into my DCF related investigative file. This is essentially why, the allegations of me desiring bloggers or others to call in phony claims about Ronald Cummings is illogical, and preposterous. It doesn't "fit" with the mode in which I conducted the DCF portion of my representation of Crystal.

Ms. Warner and I were concerned with specific, concrete information which remains confidential – not miscellaneous claims called in by the general public. Please call Ms. Warner to dispose of this allegation outright. Ms. Warner can provide you with a detailed explanation of my role in the DCF case, and the way in which witnesses and evidence were investigated, and heavily screened, prior to becoming worthy of relevance in the DCF investigation.

You may also ask her about my trustworthiness with confidential information that was involved in the DCF case. To DCF's surprise, no information regarding witness identities or other evidence was ever leaked to the media, and was tightly guarded by Ms. Warner and myself. Bonnie Warner's telephone number at the Putnam County Department of Children and Families is (386) 329-3545. You may also consider speaking with Kevin Caldwell, Senior Attorney for DCF in Putnam County, as well as Ms. Warner's Supervisor. I was in close contact with DCF officials during the course of their investigation, and they will be able to provide the Bar with valuable insight as to why and how this allegation against me is patently false.

As further commentary, there were several bloggers who have told similar tales of Crystal or her attorney making false claims to law enforcement or to DCF. These types of false claims, attempting to discredit a lawyer or party in a high media case is unfortunate, but typical. Capt. Piscitello (telephone number previously provided herein) has had the unfortunate task of ferreting through false, blogger

based allegations of wrongdoing. There have been several instances of bloggers making false claims to authorities about me or other individuals involved in the Haleigh case. I have worked with Capt. Piscitello on several occasions to refute the false reports, usually from bloggers. In one instance, I was so incensed by a false report made against me, that I volunteered volumes of memos, correspondence, investigative materials, detailed telephone records, emails, and other corroborating evidence to completely refute the malicious report. Bonnie Warner, Captain Dominic Piscitello, and Det. Cone are all well aware of my integrity and veracity, and I encourage the Bar to call these individuals regarding the allegations made by Kendall Clark, a/k/a Pirate Girl. She had made these sort of false claims in the past, and has wasted the valuable time and resources of authorities.

(G) MEDIA/INTERNET ACTIVITIES OF MARIE GRIFFIS

The leaks of information throughout the case often came from family and their friends who aimed to clear Crystal's reputation, and/or to seek notoriety and/or importance in this highly televised case. Marie Griffis was an active blogger during the course of my representation of Crystal. This was widely known. Supporting Documents Available Upon Request. See Statement of Karen Devine, Moderator of Websleuths Crime Forum.

Marie had close friends who leaked confidential information about the status of the investigation, and Crystal's lifestyle, on various "blog forums". The executed Statement by Karen Devine-Spruill, Moderator of Websleuths Crime Forum, gives specific data and information on Ms. Griffis' blogging activities, and those of Maries' close friend, Diana White. These activities severely hampered my role as media spokesperson to Crystal, as the flow of information was not able to be controlled. Release of information needed to be accomplished strategically, and methodically. On several occasions, I admonished Marie, and her friends and family, in writing, to cease blogging and leaking information on the internet.

From: Kim Picazio
To: 'Marie'
Sent: Sunday, April 19, 2009 11:42 AM
Subject: RE: Diana

OK. But please ask her not to get sucked into the blogs. People are learning personal information about you and your family through her trying to defend you. That is exactly what the bloggers want – a person like Diana. She posts one tidbit of info incorrectly, and you guys are slammed. Please tell her that I know her heart is in the right place – defending her friend and your family – but these bloggers are extremely cunning and manipulative. They know she's an insider and will run to your defense. They will suck her in. Please – tell her to read – not write – till all this is over. BTW- was Mary a cop? Did you date his stepbrother, a "Johnny L"? Who is Savannah's father?

Kim L. Picazio, Esquire

I would constantly receive emails from Marie with cuts and pastes from various blogger sites. Emails available upon Request. I received several emails from Diana regarding information she had posted on blog sites. On one occasion, I angrily demanded that she stop blogging information on the internet.

From: Diana White [mailto:whit557@bellsouth.net]
Sent: Tuesday, April 28, 2009 9:39 PM
To: Marie; kim
Subject: what I posted tonight

Originally Posted by tfrohning
I think that need to put a web cam out side of Haleighbug, and get a shot of the buy in black??!

have said before but there really was a man outside the center.
It wasn't made up.
I don't think it is safe for Chrystal to stay there any longer

{snipped for space}

From: Kim Picazio [mailto:kim@picaziolaw.com]
Sent: Wednesday, April 29, 2009 11:17 PM
To: 'Marie'
Subject: RE: what I posted tonight

NO MORE BLOGGING!!!!!!!!!!!!!! ENOUGH! TELL HER TO STOP!

Nay Nay's pimp bonded her out. We're on fire right now. Will call you tomorrow.

Volunteers assisting the family also knew of my frustration with this issue. Here is an email I received from volunteer and friend of Marie Griffis, Jennifer Townson, who knew I was extremely upset at the blogging from those close to the family:

Hi, there Kim
I hope you and your family had a wonderful Easter.... anyway I'm just gonna get to the point. I spoke to Marie last night and her and I came up with a great Idea and that is for all of us to get together and have a meeting and we will get all this bloging mess handled and I also told Marie and easy way to handle all of this is to tell everyone as a group that if anyone is cought bloging about the Haleigh Bug Center at anytime they will no longer be need at the Haleigh Bug Center and will not be aloud to help the Haleigh Bug Center at this time as this is Hurting Crystal and Haleigh!!! and as adults we need to keep this kinda of shit out of the way for Crystal! I'm working and I have only weekends off and I'm really over Debbie and her bullshit we have to keep in mind this is Crystal's and your call and would like for you to give me a call at your earliest connivance.. thanks a million for all that you do for our family and may god bless you and your family

love Jennifer

I addressed the issue of information leaks with Marie Griffis as early as the first day I was in Satsuma, Florida to take the case, as well as countless times thereafter. See text from Marie on the first day I

came to town, after I became aware that someone from the family was leaking information on the internet.

------ SMS Text -----
From: 19046524641
Sent: Mar 12, 2009 4:22 PM
Subject: Didnt want to call this is...

Didnt want to call this is Crystal's mom Marie if u r worried about who is leaking info she is staying in our house and comunicating with u Marie

These information leaks were hurting Crystal's public image, enraging law enforcement authorities, and/or my disrupting case strategy. See text message from me, to Marie and Crystal urging them not to inform their friend, Diana about confidential information in the case due to chronic leaks by her.

------ SMS Text -----
To: 9043734145
To: 9046524641
To: 9043143967
To: 9043734026
Sent: Jun 19, 2009 9:05 PM
Subject: Marie - do not tell Diane or...

Marie - do not tell Diane or anyone about this. It will be all over the internet. Keep quiet or he will hide. Teresa is a blogger with blogger friends.

Marie Griffis sought media attention whenever possible. On several occasions, media figures wanted to interview me and Crystal, but Marie Griffis stepped in to intercept the interview for herself. This was done on more than one occasion.

(4) > -----Original Message-----
> From: Word, Ron [mailto:rword@ap.org]
> Sent: Monday, June 29, 2009 4:55 PM
> To: kim@picaziolaw.com
> Subject: Haliegh Cummings case.

> Kim:

> My name is Ron Word and I'm a reporter for The Associated Press in
> Jacksonville. I am attempting to do an update on the investigation into
> Haleigh Cummings disappearance.
>
> So far, investigators have ignored by emails and telephone calls. Would
> it be possible to talk with Ms. Sheffield for a few minutes about her
> daughter's case?
>
> Thanks,
> Ron Word
> rword@ap.org

----- Original Message -----
From: "Kim Picazio" <kim@picaziolaw.com>
To: "'Marie'" <luckylady@nefcom.net>; "Marie Griffis" <mar_griff@yahoo.com>; "Crystal Sheffield" <creepsheffield@yahoo.com>
Sent: Tuesday, June 30, 2009 12:01 PM
Subject: FW: Haliegh Cummings case.

> Someone please call me and let me know if they want to do an interview
> with the AP. This is the most legitimate media source in the country. Please
> advise ASAP!!
>
> Kim L. Picazio, Esquire

> -----Original Message-----
> From: Kim Picazio [mailto:kim@picaziolaw.com]
> Sent: Tuesday, June 30, 2009 12:16 AM
> To: Word, Ron
> Subject: RE: Haliegh Cummings case.
>
> I will send her your request. Thank you for your email.
>
> Kim L. Picazio, Esquire

-------- Forwarded message --------
From: Marie <luckylady@nefcom.net>
To: Kim Picazio <Kim@picaziolaw.com>
Date: Tue, 30 Jun 2009 12:10:32 -0700
Subject: Re: Haliegh Cummings case.

Taken care of I spoke with him this morning.

Supporting Emails from other media figures are available upon Request. See also, my email to Marie demanding that family and friends cease doing media interviews and requesting no blogging on internet.

-----Original Message-----
From: Kim Picazio [mailto:kim@picaziolaw.com]
Sent: Monday, April 13, 2009 11:36 PM
To: Marie Griffis (mar_griff@yahoo.com); Crystal Sheffield (creepsheffield@yahoo.com)
Subject: War of Words - Action News Jacksonville

Marie:
Please see media link below. Debbie Townsend, named as "family friend" made a statement to the media, claiming the Sheriff's office have no concrete leads... No one may make any statements to the media as a family friend. It is very important. Further, this statement is completely untrue, and pisses off the Sheriff's office. Unless they've cleared the info with me, we must urge all of your friends and family not to make any statements to media. I make very calculated statements. I don't need a source close with the family mucking up the Sheffield camp's positions on any issue. Please - no statements, no blogs.

(H) CONTINUED INTERNET BLOGGING BY THE FAMILY IS RAMPANT

Despite Captain Piscitello's admonishment to the "family" to stop leaking information over the internet, Ms. Griffis continues to rally Crystal supporters on blog sites, and/or divulge sensitive information to bloggers such as Clark a/k/a "Pirate Girl". By way of a recent example, Griffis has posted **525 entries** or "tweets" on open Twitter account. There, she updates bloggers about the status of the investigation, responds to bloggers' questions, and reports on why Crystal has done this or that. See Twitter website, Account Name Marie1207. Griffis posted a total of 27 "tweets" on her Twitter account, in the twenty four (24) hour period of October 26, 2009 to October 27, 2009. Many of Griffis' entries contain highly disparaging or inflammatory remarks about the Father of Crystal's children, Ronald Cummings and Misty Cummings, and send a call to bloggers to rally state authorities to give custody to Crystal and arrest Ronald and Misty.

III. CHILD SUPPORT MODIFICATION AND DUE DILIGENCE

The Complainant has alleged that I failed to act with diligence by not filing a Supplemental Petition for a decrease in Crystal's child support obligation to her two (2) children in Ronald Cumming's custody. As stated in my Answer to the Complaint, I did not feel it appropriate to request a modification based upon Haleigh's absence from the family during the initial few months after the child's abduction, for obvious reasons. I spoke with my client about this on numerous occasions, and in May or early June, we felt an appropriate time had passed since the child's disappearance to request a downward modification of child support due to Haleigh's absence, and/or Crystal's medical issues. I spoke with the Father's counsel, Jerry Snider, Esquire, who agreed to an amicable recalculation of child support. We exchanged several correspondence wherein he acknowledged and agreed to settle the issue of child support recalculation amicably. Records available upon request.

Crystal's entire child support arrears obligation had been paid in full by a generous donor from Texas. This donor's contributions to Crystal were expressly made, due to the interviews I had done on national television describing Crystal's difficult life and background. Emails from donor available upon Request. By April 2009, I had created a surge of public sympathy for Crystal, and an outpouring of support being offered to her.

A Standard Family Law Affidavit is required by a movant seeking a decrease in child support. I forwarded a form financial affidavit to Crystal to be filled out, but she never completed the required paperwork. I urged Crystal, and her family to assist her in gathering the proper paperwork to produce to then-cooperative opposing counsel to recalculate child support. Responses to my various requests for information and/or paperwork from my client were not forthcoming. I also have countless unanswered emails and texts requesting Crystal contact me regarding this issue. Finally, I wrote to Marie, expressing concern over their lack of cooperation regarding the modification of child support issue.

From: kim picazio [mailto:kim@picaziolaw.com]
Sent: Tuesday, June 30, 2009 3:25 PM
To: 'Marie'
Subject: Status

Marie:
I know you're busy with the hay season, but I have to speak with you about a few things. I am a bit confused about your lack of communication with me. Please give me a call, as there are several important issues we need to speak about. If you would rather do the child support modification on your own with Crystal, please let me know. I am unsure as to what you want me to continue with, as I have not spoken with you. If there is something bothering you, I would really like to discuss it. I have given my heart and soul to protect your family, as well as dedicated time and funds to assist you guys. I am willing to continue to do so, but need to be able to communicate with you. Crystal needs to have her child support modified, and we must discuss future custody issues. Please give me a call to discuss. Thanks.

I can provide numerous emails and texts wherein I am attempting to get my client's cooperation on the modification of child support issue.

----- SMS Text -----
To: 9043734145
Sent: Jun 30, 2009 3:43 PM
Subject: Please give me a call re: ...

Please give me a call re: modification of future child support.
Kim Picazio

I wrote to both Crystal and Marie Griffis explaining my frustrations about their lack of communication and cooperation in this regard. In order to suspend her support obligation, I would need a medical doctor to confirm that she was advised not to work or drive. I attempted to obtain this document from Crystal on countless occasions. Prior to each doctor appointment, I would text her and call her to remind her to obtain the necessary doctor's recommendation. Each time, she would forget to request the paperwork. It took me texting Crystal a reminder on July 1, 2009, an hour or so prior to a doctor's appointment, to finally obtain a note from the doctor. See reminder I sent to Crystal on that date.

----- SMS Text -----
To: 9046524641
To: 19043734145
Sent: Jul 1, 2009 10:14 AM
Subject: Remember to ask the doctor to give...

Remember to ask the doctor to give you a note that says NO DRIVING - if that's what he advises. And you need to ask him how he feels about you working right now. He needs to put his recommendations in writing. DON'T FORGET! Luv u!
Kim Picazio

After the appointment that day, Marie Griffis emailed me a copy of a doctor's illegible prescription with a question mark as to when Crystal could work. See doctor's note attached to Complaint. This document was wholly illegible, and was not going to be sufficient to produce to opposing counsel, or a Court, to request a modification or termination of child support due to bonafide medical disability preventing the ability to work or drive. I was frustrated, and asked Crystal to call the doctor back for an official, or at least more legible diagnosis and recommendation. None was forthcoming. Crystal never responded to me, and never produced any further documentation regarding her doctor's recommendations, or any information whatsoever about her medical condition. Even as of July 13, 2009, I was still attempting to get Crystal's cooperation with regard to this issue. I filed a Motion to Withdraw on or around July 16, 2009, three days later.

From: kim picazio [mailto:kim@picaziolaw.com]
Sent: Monday, July 13, 2009 3:44 PM
To: 'Marie Griffis (luckylady@nefcom.net)'; Crystal Sheffield (creepsheffield@yahoo.com)
Subject:

Crystal/Marie:
I spoke with Jerry Snider today regarding the child support going forward. I told him that I have no idea how you guys wanted to proceed. If you guys want me to assist suspending or modifying Crystal's child support, please contact me. Otherwise, I will assume that you do not want me to take action in that regard at this time.

I received a copy of Tim Holmseth's latest FBI Complaint. I believe this is the 3rd or 4th one he has written to them. I would really appreciate one of you getting back to me on these issues.
Thanks.

It should be noted that, Crystal's present attorney has likewise not filed a Supplemental Petition for a downward modification of child support, to date.

IV. DUE DILIGENCE AND MY ROLE AT THE HALEIGH BUG CENTER

In their original Bar Inquiry, the Complainant(s) falsely alleged that, "Crystal Sheffield and Marie Griffis were not aware of any of the actual administration of the Trust, nor were they given access to any banking records. They were not even aware of the location of the bank for the Trust due to the fact that Bank Atlantic branches were only located in Southern Florida. Crystal Sheffield received $300 in total from the trust for reimbursement of living expenses. Jeremiah Regan stated to Crystal Sheffield that he had turned over a record book to Kim Picazio of donations received. Crystal Sheffield and Marie Griffis have not seen the record book and have no knowledge of the amount of donations that were received or how they were disbursed."

Now, in their October 7, 2009 Response, the Complainants wholly retract this allegation, and admit that there was never a Trust Account opened by me for Crystal. This retraction comes oddly on the heels of their highly detailed previous version of the actual banking institution and county in which the phantom Trust Account was located. In my Answer to the original Inquiry, I explained that the Trust was not ever completed because the family could not decide who would be the trustee. Although Marie Griffis insisted on being Trustee, the trust attorney advising the family told them that Marie could not serve as a Trustee of the Trust.

I reiterate my representations contained in my original Response to the Complaint regarding my role at the Haleigh Bug Center. I paid for its set-up for the family's comfort as a placed to convene. I spent thousands of dollars in rent, utilities, and refurbishment to have the building suitable for occupancy, and available for the family and the community. I did not run the Center, nor did I have specific knowledge of what went on there. I did not spend much time in the building. I paid for the Center as a gift, in kind, to the family and the community, and would often stop by to visit or pick up Crystal and her family.

A full corroboration of my role at the Haleigh Bug Center can be found in the executed Statement of Jeremiah Regan. Other Witnesses and Supporting Documents Available Upon Request.

In their Response, the Complainant(s) state, "Contrary to Kim Picazio' s allegations, it was Picazio herself that suggested the PayPal link be placed on the web page for the sales of tee shirts or bracelets to people from out of town. Crystal Sheffield and Marie Griffis had no knowledge of how to set up a PayPal button on a website." This is a false statement. See email from Marie Griffis to me, urging me to set up a Paypal Account on the Website. I refused to do so.

—— SMS Text ——
From: 19046524641
Sent: Apr 28, 2009 11:21 AM
Subject: Call me when u get time i need to...

Call me when u get time i need to know about getting pay pal acc. Set up for donations for new flyers that are going up north Marie

I can produce emails and testimony from my staff members and other volunteers that this allegation is patently false, as many of us explained to Marie on several occasions that such an aggressive approach for donations to the family would be seen as inappropriate, and would create extremely bad press. I cannot imagine that a single volunteer for friend of Griffis/Sheffield would testify that I had any dealings with T-Shirt or other sales at the Haleigh Bug Center. This was absolutely an activity that Marie Griffis commenced, and had full control over. Marie purchased boxes of t-shirts, car magnets, bracelets, stickers, necklaces, etc. with Haleigh's face imprinted on them. Marie, Crystal, and their friends sold these items at the Center, and there are countless witnesses who would be willing to confirm this. See Statement Executed by Jeremiah Regan. Other Supporting Documents Available Upon Request.

I was never involved in any way in any activities at the Haleigh Bug Center, in the receipt of donations, fund raising, or keeping records of the same. I advised the family that they should keep track of these issues, as they would need to report the receipt of funds at the end of the tax year. Marie informed me that she was a certified tax planner, and had a nephew who was a CPA, and they would be handling these issues on their own. Supporting Documents Available Upon Request.

The Complainants have also claimed that JEREMIAH REGAN, was somehow complicit in their horribly false tale about the Haleigh Bug Center. JEREMIAH REGAN was a faithful volunteer and supporter of this family. Their allegations are false, and JEREMIAH REGAN has submitted a signed

statement in direct response to the false allegations made regarding the Haleigh Bug Center and funds received by the Sheffield/Griffis family. See Statement of JEREMIAH REGAN submitted simultaneously with this Sur-Reply.

Additionally, as stated in my Answer to the Inquiry, I did not have any books or records from the Haleigh Bug Center. I was so concerned for potential liability by Crystal, I requested that my brother in law, DONALD KNOP, drive to Satsuma and look for any receipts or records that Marie may have kept on hand. He found very few records or accounting documents, but emailed me what he found in the Center. Emails provided upon receipt. The only book or record of donations found at the Center is attached hereto as **Exhibit A,** a document clearly in Marie Griffis' handwriting. Miscellaneous receipts were also found at the Center, but only for supplies that I had personally purchased for the family.

I was very concerned about the sales and fund raising at the Center. I continued to warn the family and their friends about accounting procedures which could get Crystal in serious trouble for continued improper fund raising. Marie had complete control and knowledge of all funds donated for Crystal, which she disbursed to her in segments and/or spent on T-Shirts to be sold by her and her friends to the general public. See text message to me from Marie Griffis accounting for the funds in her possession and how she intends to distribute them to Crystal.

—— SMS Text ——
From: 19046524641
Sent: Apr 23, 2009 3:21 PM
Subject: Crystal has ur money and i gave...

Crystal has ur money and i gave her 1400 to go into her acc i only have 217 left i will give it to her in 2 weeks Marie

My concern over these issues led me to call a meeting of the family and the volunteers at the Center. I did not want to be associated with any improper conduct at the building I was renting for the family. Attached to the Statement from Jeremiah Regan is the accountant he personally gave to me and the family on April 8, 2009. I have personal knowledge and hereby confirm and corroborate every statement made in the Executed Statement of JEREMIAH REGAN.

Also present at the meeting was Crystal's Father, Johnny Sheffield, step-mother, Connie Sheffield, Center volunteer and friend, Debbie Huddleston, and my security guard, Chuck Martin. All of these individuals can testify to the fact that all money issues were discussed thoroughly on that day to everyone's satisfaction, that I had no active role in the raising or tracking of donations to the family, that the Trustee issue had yet to be decided, and that Jeremiah Regan had done a satisfactory accounting of any funds he had ever had in his possession. From that date forward, no funds were ever held or given to any individual other than Crystal and her mother, Marie.

The Complainants have now admitted that there was distrust regarding their friend, DEBBIE HUDDLESTON, who was requested by the family to volunteer everyday at the Haleigh Bug Center to sell t-shirts and bracelets to the public. Eventually, Crystal took Debbie's keys to the building away from her, and Debbie left without giving the family the accounting book she allegedly had in her

possession. I asked both Marie and Crystal to get in touch with Debbie on several occasions to retrieve her log book for their personal accounting at the end of the year. This request was ignored. I became very frustrated about the family's lack of diligence on these, and other issues. I was aware that there could be potential liability for Crystal if these matters were not handled properly. See my email to both Crystal and Marie, as a Reminder of things that had been repeatedly requested, to no avail. This email specifically mentions, and refutes, several areas and issues complained upon by the family. I simply was unable to gain their cooperation, despite constant clear and express reminders and instructions on these issues. (see mention of retrieving books from the Center from Debbie Huddleston, as #2):

From: Kim Picazio [mailto:kim@picaziolaw.com]
Sent: Wednesday, July 01, 2009 10:07 AM
To: 'Marie'; Marie Griffis; Crystal Sheffield
Subject: To Do List

REMINDERS:

(1) Ask Crystal's doctor for a note stating that she should not drive. Also, if she should not be working at this time, he needs to get her a note that says that as well.

(2) Marie – you need to call and to write Debbie requesting all documentation or books from the HB Center regarding donations or expenditures. You need it for tax purposes. Please put a "read notification" on your email to her so that you can be sent an email when she opens up your email to read it. That will confirm she has read your email. Also, put in a call to her about this. This is very important!

(3) Have Crystal call Bonnie Warner and let her know about Junior's behavior, kicking holes in the walls, and refusing to speak to father on the phone. Request DCF put services in effect so that the child can obtain counseling or something. A psychologist needs to evaluate Junior to ascertain where his anger is stemming from. Ask Bonnie what you guys should do, and if DCF can help this child.

(4) Someone call the Putnam County Medical Center (the hospital where Crystal went after the 2 seizures in Satsuma). We need the entire medical files for both the March and April 2009 seizures. They may be able to mail it to you after you sign HIPPA forms. I cannot move in a custody case until we check out these records. It is my understanding a Toxicology screen was done for the March seizure, but not for the April one. We need these medical records prior to filing anything on custody of the kids.

(5) Marie: at some point, get all the documents and records from the Haleigh Bug Center together so that if any authority requests an accounting of how much money was received, and where it went, you will be ready with an organized package.

(6) Be sure to look at Art Harris' latest story – I had him clear up the "crack" issue, and he posted pictures of Crystal and the kids to combat the "doctored" photo issue. The comments after his story seem very positive.

(7) Everyone should be instructed not to answer any questions about the crack pipe issue, or who the truck is owned by. No comment is the word on this. Marie: you need to be very careful of what Diane knows about this issue. If she reports that the truck was Chad's, and that they were his old pipes, that would be extremely bad. DCF would most likely get involved, and Chad could get arrested. Every "Ron" fan on the internet would call the authorities and demand action against Chad and Crystal.

(8) Marie: please change all of your internet account passwords for discussion boards. Especially Websleuths. Diane has signed on your account on at least one occasion.

(9) Warning: The guy Timothy Holmseth and Cobra seem to be on a mission to continue to report false allegations. It is my understanding that Tim wants to gather enough crap on the Haleigh case to sell to the National Enquirer. He has no money, and no job. He sells his blood every two weeks for funds to live on. He is even sending threatening emails to TJ Hart and Art Harris. I will forward the latest one to you. I believe he thinks that Crystal and family has received lots of money in donations, and refers to it as "blood money". Of course, this is not true, but he and Cobra are reporting everything they can to everyone they can. Cobra is involved with Reverend Grund from Orlando, and had previously had plans to make a movie about the search for Haleigh Cummings. His arrest and inability to get any information from either side of Haleigh's family is crushing that dream. He then befriended Connie and Ruby, who of course, would do anything to slander your names. Always have, always will. I believe they are trying to ruin you guys, (and me because I'm standing in the way). So we just need to keep an eye on their allegations to protect ourselves. The best thing we can do is continue to act properly, have the records of donations and expenditures ready, in case any authority they have called wants to check things out. You have done nothing improper, but we need to be ready for anything they may throw your way.

I WILL SEND A DIFFERENT EMAIL ABOUT THE CHILD SUPPORT MODIFICATION ISSUE, AND WHAT WE WILL NEED
(Aren't I a pain in your ass?)

VI. ALLEGATIONS IN STATEMENT FILED BY KENDALL CLARK A/K/A PIRATE GIRL

Kendall Clark, a/k/a Pirate Girl, and her blogger friends, have created blog sites that report rumors and other information on the Haleigh case as fact. She has been caught giving false information to leading journalists following the Haleigh Cummings investigation, which has resulted in law enforcement following up on bogus leads, wasting valuable time and resources on fraudulent information reported by her. On one instance, Clark reported a fraudulent tip to a national media figure who often appears on Nancy Grace and other CNN programs. She was appropriately chastised by the journalist, and became malicious to him when he revealed her scheme.

-----Original Message-----
From: T J Hart <TJHart@entercom.com<mailto:TJHart@entercom.com>>
To: scallywenchfl@aol.com<mailto:scallywenchfl@aol.com>
<scallywenchfl@aol.com<mailto:scallywenchfl@aol.com>>

Sent: Fri, Jul 24, 2009 8:51 am
Subject: RE: this is the pirate

Pirate,

Thanks, for the link. I've heard versions of this before, but not to this degree of detail. If you know the writer of the email or someone associated with it, I'd appreciate an introduction so I can follow up on this claim.

http://img132.imageshack.us/img132/2448/fulltippdm.jpg

TJ Hart
Director of News and Programming
News/Talk 97.3 The SKY WSKY HD1
97.3 WSKY HD2 Subterranean
WSKY Online News
3600 NW 43rd Street
STE "B"
Gainesville, FL 32606
O-352-377-0985 ext 705
C-352-316-1715
F-352-337-2968
[cid:image005.gif@01CA0D07.A21D93E0]

From: scallywenchfl@aol.com<mailto:scallywenchfl@aol.com>
[mailto:scallywenchfl@aol.com<mailto:scallywenchfl@aol.com?>]
Sent: Friday, July 24, 2009 9:26 AM
To: T J Hart
Subject: Re: this is the pirate

You are the only real journalist that has kept the story focused without giving too much credence to the storm swirling around the situation. I have a feeling that if you work with that blogger something good will happen.
I appreciate Art but I think he has damaged his credibility a bit by overreporting the soap opera aspects of the case. I think Cobra's heart may be in the right place but that he has too much fun playing cowboys and indians. Same goes for Kim. If the two of them had stayed focused on Haleigh instead of drama things may have been resolved by now.
It hurts me to know that there are people who love Haleigh and they don't know where she is. And it ticks me off that there are probably people who are supposed to love her and have the answers but are covering their own butts. And I worry every day about Ron Jr.
Maybe you can ask your friend Barack to sign an executive order to haul them all in and subject them to waterboarding until they talk.

From:scallywenchfl@aol.com<mailto:scallywenchfl@aol.com>
[scallywenchfl@aol.com<mailto:scallywenchfl@aol.com>]
Sent: Friday, July 24, 2009 7:09 PM

To: T J Hart
Subject: Re: this is the pirate

Have you been able to talk to Justice? They posted that the e mail did not come from a hot mail account.
Several people didn't seem surprised by the information and acknowledged knowing. I'm wondering if the "hoax" admission was the actual hoax. Justice was right when he said that anytime someone gets too close to the truth they come under attack.

What do you think?

-----Original Message-----
From: T J Hart <TJHart@entercom.com>
To: scallywenchfl@aol.com <scallywenchfl@aol.com>
Cc: T J Hart <TJHart@entercom.com>
Sent: Sat, Jul 25, 2009 7:31 am
Subject: RE: this is the pirate

Pirate, Justice, whoever that might be, is in some serious trouble.
I have my corporate lawyers looking into any possible actions that can be taken.
This was tremendous waste of valuable time since I covered Ron's whereabouts several months ago with a much different outcome as did Art Harris.

TJ Hart

From: scallywenchfl@aol.com [mailto:scallywenchfl@aol.com]
Sent: Saturday, July 25, 2009 8:39 AM
To: T J Hart
Subject: Re: this is the pirate

TJ I'm not sure why you are taking this up with me, you might be better served to share your concerns and threats with the blogger but be careful. I've studied the first amendment and it doesn't appear that this person has done anything wrong. The blog states clearly in the heading that it is based upon opinion and observation. Nothing is stated as fact and instead the audience is given the opportunity to make their own decisions about the unauthenticated data. I would think as a journalist you would know that.

You've tripped a few times already in this case by saying Crystal fled from DNA testing, that she was flirting with you and the infamous search this week. Take it easy and focus your anger where it belongs, on the people who will not disclose where Haleigh is.

Haleigh needs you and so does her family. These silly and unfounded threats don't help her and only damage your credibility. You've worked too hard and too long to let that happen.

From: T J Hart
Sent: Saturday, July 25, 2009 9:26 AM

To: 'scallywenchfl@aol.com'
Subject: RE: this is the pirate

Pirate,

I was informing you that the person who burned you on this email (Justice? Pia?) is the one at issue.
It was brought to my attention late yesterday that this person was on a mission to discredit you and YOUR site with this bogus information so I thought you might like to know.

Please look at the HLN PRIME NEWS video http://www.youtube.com/watch?v=eCSBtqTDbag , and you will see that I was the one who reported accurately and calmly that she told people she was going to a doctor's appointment while HLN was attempting to sensationalize the non-story. It's documented a fact.

I've atoned publicly for any missteps in reporting on this case, which means I take responsibility for my actions.

As far as the 1st Amendment is interpreted, you can say most anything you want unless it is slanderous or libelous. It also contains caveats that make it illegal to do things like yell FIRE in a crowded theatre where no fire exists.

TJ

The Statement allegedly provided by Clark is unsigned and outright perjurious. Further, her credibility is substantially lacking, as she is a known blogger, who has given false information to the media and law enforcement.

Clark's spiteful and fraudulent representations regarding my personal issues related to William Staubs and/or Jeremiah Regan are false. See Statement by William E. Staubs, Licensed Private Investigator. See also, Statement by Executed Statement by Michael J. Picazio.

Clark's claims of ceasing communications with me, and the reasons therefore, are false and untrue. See Statement of Karen Devine, Moderator to Websleuths Crime Forum. I can provide the Bar with an entire history of email correspondence between Clark and several other individuals, which clearly demonstrate Clark's scheme to defraud in order to gain personal access to the Sheffield family. Documents available upon Request. Further, Clark often asked me if she could speak with the family of Haleigh Cummings, and often made up excuses why she needed to speak with them. Emails upon Request. I would never allow her to contact my client. On one occasion, Clark even offered to purchase Crystal a spa package so that she could meet her. On another occasion, Clark drove to the Haleigh Bug Center bearing gifts for Crystal, stuffed animals for her children, and a Target gift card. I understood that Clark was on a mission to get close with my client, and was very apprehensive about this issue. I have emails from Clark documenting all of these facts and requests which can be provided upon Request.

I have emails and can provide Affidavits from individuals demonstrating Clark's fraudulent statements about me to Crystal Sheffield and Marie Griffis. I have correspondence showing direct admissions by Clark of creating false identities on blogger websites, e.g. "the EA" in the process of setting up the scheme to defraud Marie Griffis. I am also in possession of correspondence showing Clark contacting both Tammy Spratt, and Karen Devine, for the sole purpose of defaming me, and admitting that she was "2/3 wrong" about the information she had supplied to Marie Griffis about me. In one email to Tammy Spratt, she apologizes for her behavior. Email Correspondence available upon Request.

As recently as one month ago, Clark telephoned Tammy Spratt, whom she cruelly alleges has physical and emotional issues, and played her a messages allegedly of my voice. Clark claimed that I had recently called her, and stated defamatory information about Ms. Spratt. In July, 2009, Clark attempted to bribe Tammy Spratt, offering her defamatory information she claimed to have about me (in the form of 3-4 emails), in exchange for the name of "the leak" in her website membership, The Garden. Correspondence Available Upon Request. I am in possession of numerous emails from Clark to others, wherein she is plotting to "take down" another blogger, BusyLady, by impersonating other individuals on the Internet. Following her threats, I am in possession of screen shots of her actually impersonating friends of Ronald Cummings and his Mother, Teresa, in order to get information from bloggers. Provided upon Request. Clark launched a full-fledged attack on the reputation of independent journalist Art Harris, as well as the Moderator of his Website, The Bald Truth. Clark's manipulation, outright cyber fraud, cyber bullying, express threats, and vicious libel, has been reported to various authorities by Harris and his staff within the past few weeks, and is being investigated.

In summary, Clark is a blogger, who has become obsessed with the Haleigh Cummings case. She preyed upon this family of a missing child, and is presently under investigation by authorities. Unsigned statements by individuals of this character have no place in these proceedings, and should be wholly disregarded by the Florida Bar.

From: "KarenD415@aol.com" <KarenD415@aol.com>
To: pkat_2002@yahoo.com
Sent: Tuesday, June 2, 2009 9:25:32 PM
Subject: (no subject)

Is there anyway you can give me a link to where they're talking about Marie on Topix? I'm trying to do some investigating.

CONCLUSION

Each and every allegation contained in the subject Bar Inquiry either (1) would not constitute a violation of the Rules of Professional Conduct, or (2) is false or illogical, as refuted by emails or Statements of Witnesses, attached.

Donations acct for Haleigh

	Initials	Date
Prepared By		
Approved By		

	Date	Truck Raffle	Donations	T-Shirts	Bracelets	Necklaces
				$15.00	$2.00 + $3.00	$2.00
		$3090.00	Dollars ¢		Dollars ¢	
1	04		.00		.00	
2						
3	3/27/07	1350.00 reimbursement for T-shirts to Mexico				
4	3/30	260.00 reimbursement for Gas, Food, etc.				
5						
6	4/3	150.00 me + Crystal Nail Lunch	0.00 to Crystal			
7						
8	4/8	200.00 for Gas, Dessie Food				
9						
10	4/15	T-Shirts $365.00 - 80 = 4/5.00				
11						
12	4/22	650.00 Rent, Lights + Water / Fire Dust				
13	4/24	@3 Bracelets				
14						
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"Exhibit A"

October 27, 2009

From: Karen Devine
Re: Statement made by Kendall Cummings Clark

My name is Karen Devine and I am replying to statements made about me by Kendall Cummings Clark.

I am a moderator on a true crime forum, Websleuths.com. I have been a member since 2006. Websleuths is 12 years old with 21,588 members. It is owned by Tricia Griffith. Kendall Cummings Clark was a member from December 2008 to June 2009 when she was banned from Websleuths for gross misconduct.

Kim Picazio was a member of Websleuths. Her user name was KLP. She also had the name Jerrico but it was deleted and all posts were merged with KLP as only one user name per poster is allowed.

It is not uncommon for LE, lawyers, family members or friends of high profile cases to join Websleuths. We have had such members of Jon Bonet Ramsey, Scott Peterson, and OJ Simpson cases to name a few.

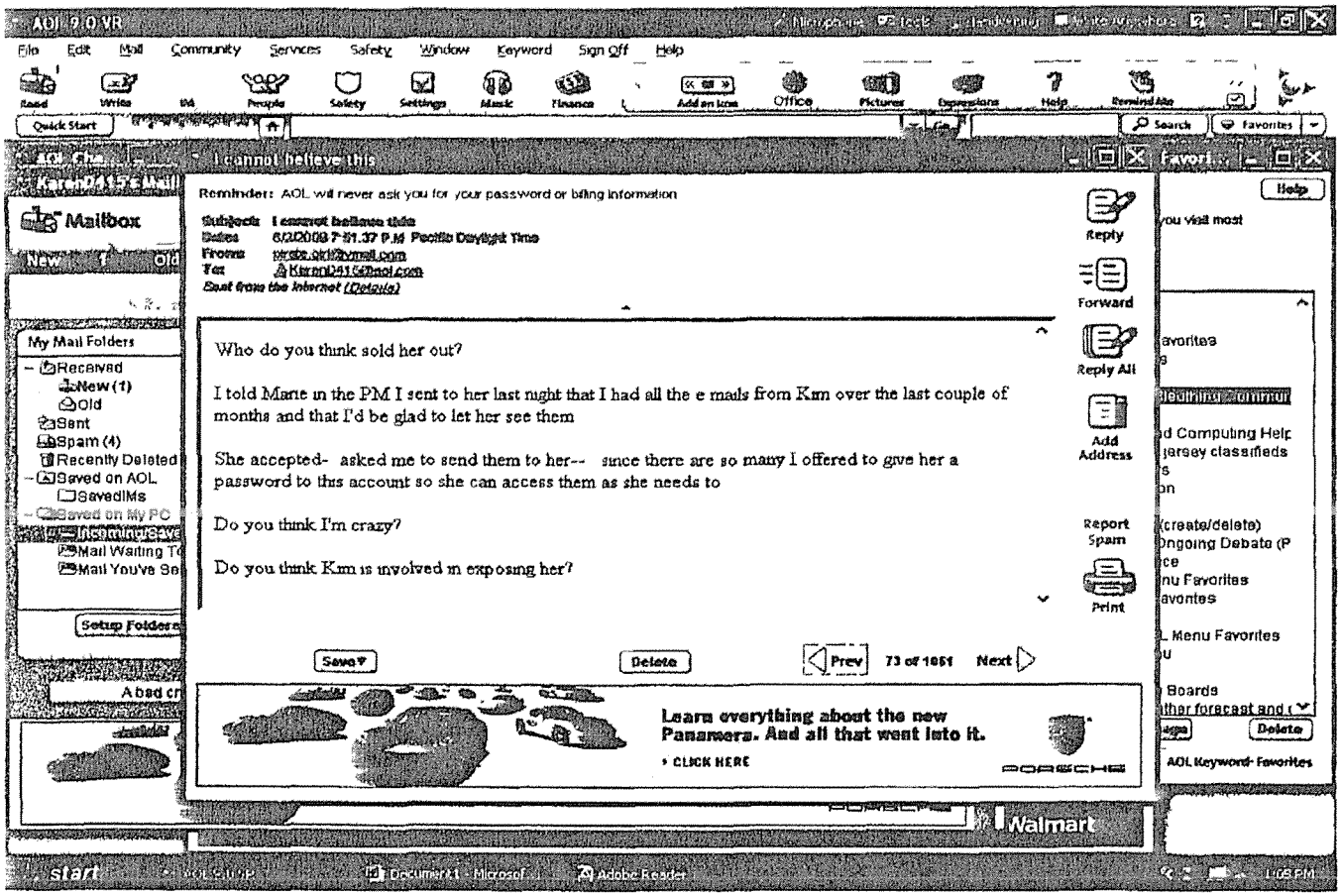
Kendall Cummings Clark is none of the above. She is not part of LE, a lawyer, a family member or friend of anyone associated with Haleigh Cummings. She told me she is a mustard and ketchup sales representative. She was an anonymous poster posting on both the Caylee Anothony case and the Haleigh Cummings case. Although it is rare, there have been occasions when poster like Ms. Clark over-step their boundaries and attempt to insert themselves into these cases where they don't belong.

Ms. Clark states that I "abused my moderator position" in order to prevent Crystal Sheffield and her family from learning that Kim Picazio was spreading false information on the internet. This is a bold face lie. Although Ms. Clark didn't elaborate for the courts, I will say that my only interaction with anyone in the family was with Marie Griffiths and it was very brief. Marie is also a member of Websleuths and is still a member, originally having the username Seeker4Truth, then I changed it to SNL411. Although she has not signed on in a few months, one of her friends, Diane (another Websleths member), signed into the SNL411 account about a month ago. Records of this are available.

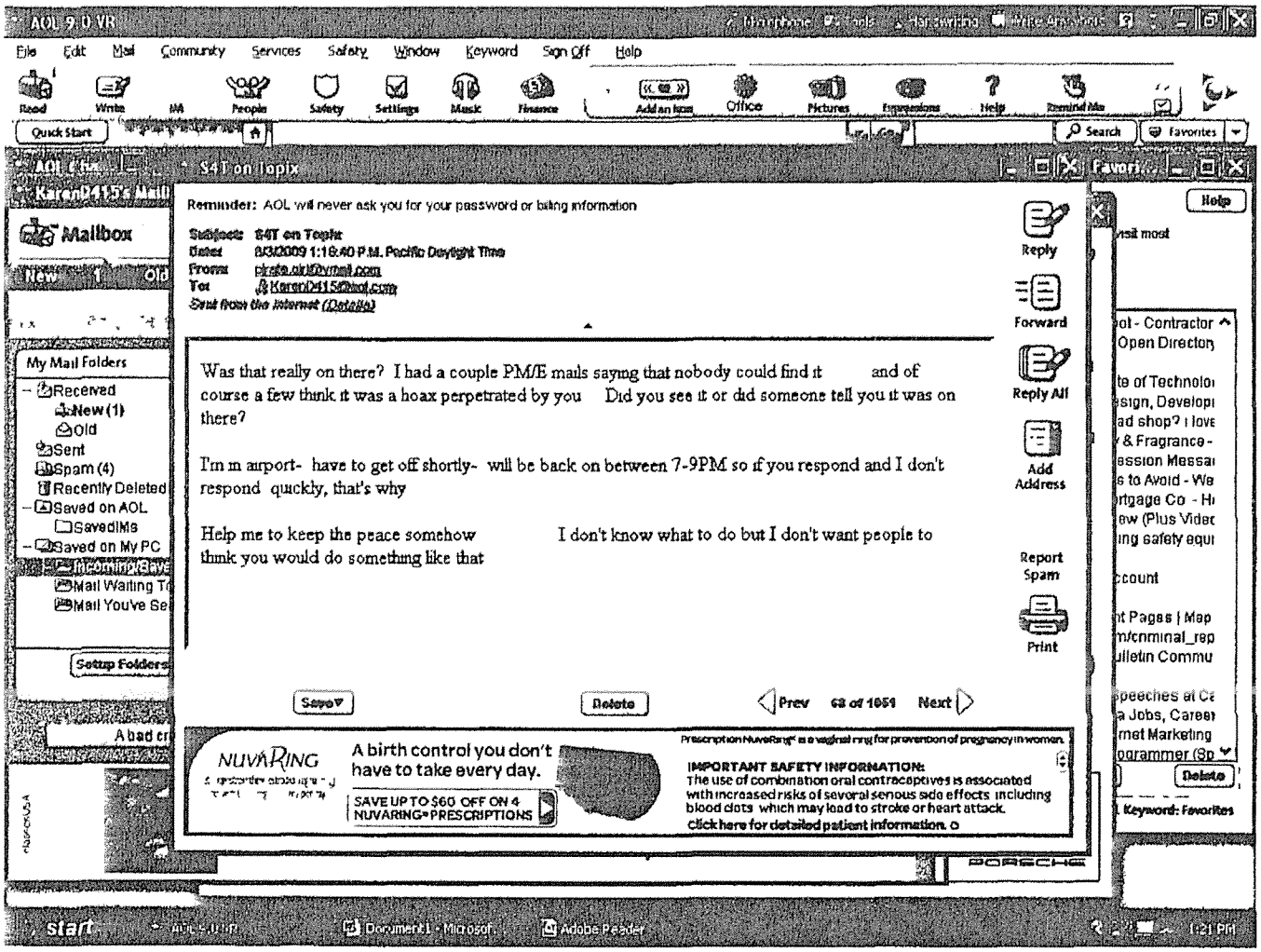
When Marie Griffiths was actively posting on Websleuths, another poster who uses the nic Busylady (Her real name is Penny _____. She has asked me not to use her last name here as she doesn't want Ms. Clark to have it, but she is willing to sign a separate affidavit stating what I say is true), contacted me via email to tell me that posters on another website (Topix) were talking about Marie posting on Webseluths. I immediately contacted to Marie to tell her what I heard so she could protect herself. Marie told me in a private message that she suspected who it was. I told her it was not Kim Picazio. Ms. Clark also TOLD me it was Kim Picazio and I told her no, Ms. Picazio wasn't even

aware that Marie was on Websleuths. I told her this in June and again in July via email (attached), that it was Busylady who told me.

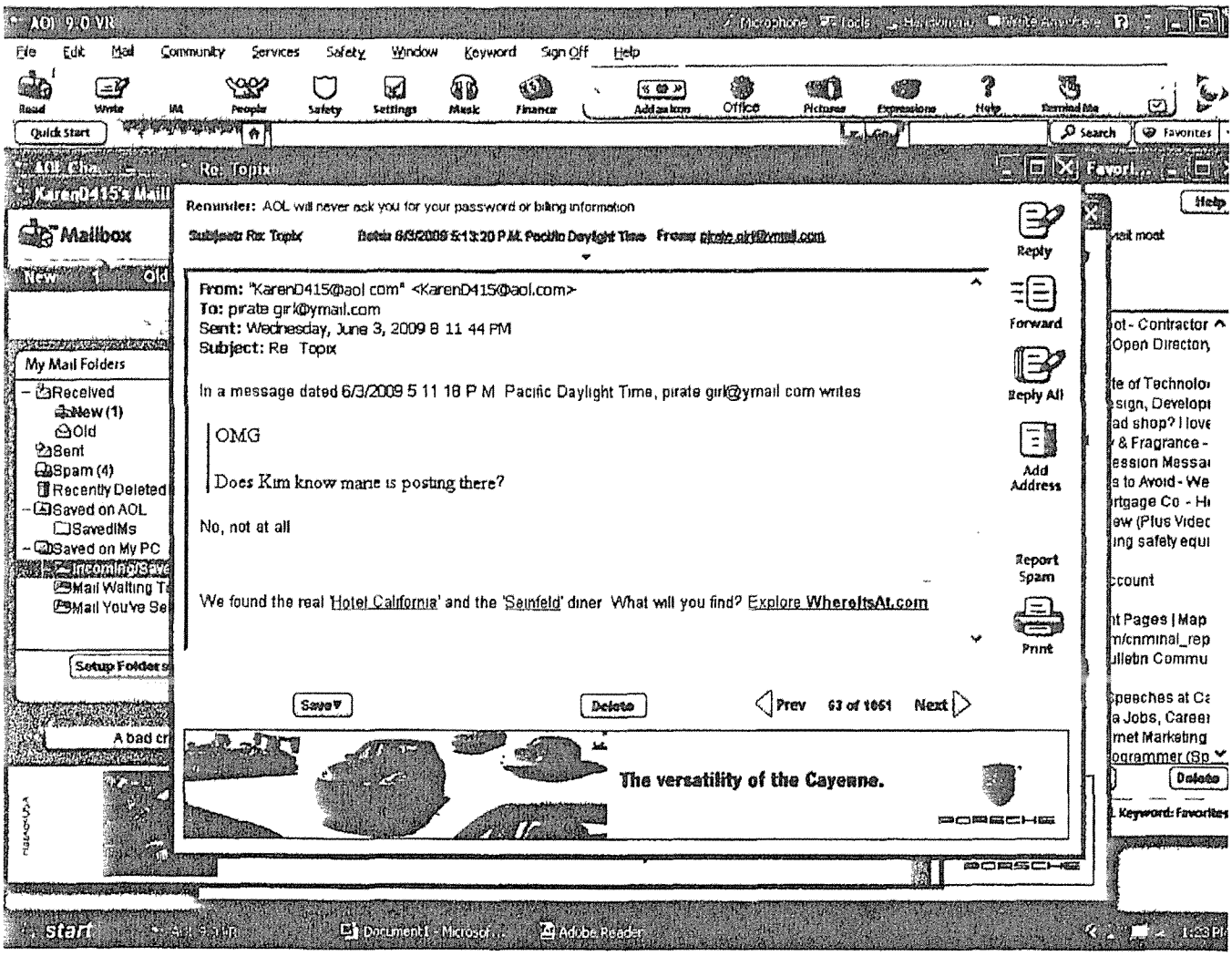
Here is an email from Kendall Cummings Clark aka Pirate, asking me if I knew who was saying Marie was posting on Websleuths This is dated June 2, 2009:



Here is her next email, insinuating that I had something to do with it. This is dated June 3, 2009.



This is another email dated June 3, 2009 where she continues to insinuate that it was myself or Ms. Picazio that said Marie was on Websleuths. You can see my reply where I said that no, Ms. Picazio did not know she was there:



The following email is dated July 17th, where again, I tell Ms. Clark that Kim Picazio had nothing to do with people saying Marie was on Websleuths. I'd like to add that Ms. Clark frequently tells people that she has emails stating such and such, but never shows them to anyone. Just threatens to expose people (extortionist). They don't exist, she makes it up. Ms. Clark is well known for doing this, for literally making them up…no originals available. Clearly my reply, written 3 months ago, is not only the truth, but I am going to include my emails with "Busylady" to back this up. This email is too big for a single copy, so the next two copies of emails are from the same original:

AOL 9.0 VR - [Re: GARDEN]

File Edit Mail Community Services Safety Window Keyword Sign Off Help

Read Write People Safety Settings Music Finance Add an Icon Office Pictures Expressions Help Remind Me

Quick Start Search Favorite

Reminder: AOL will never ask you for your password or billing information.

Subject: Re: GARDEN Date: 7/16/2009 8:16:27 A.M. Pacific Daylight Time From: pirate.girl@ymail.com

From: "KarenD415@aol.com" <KarenD415@aol.com>
To: pirate.girl@ymail.com
Sent: Thursday, July 16, 2009 10:59:48 AM
Subject: Re: GARDEN

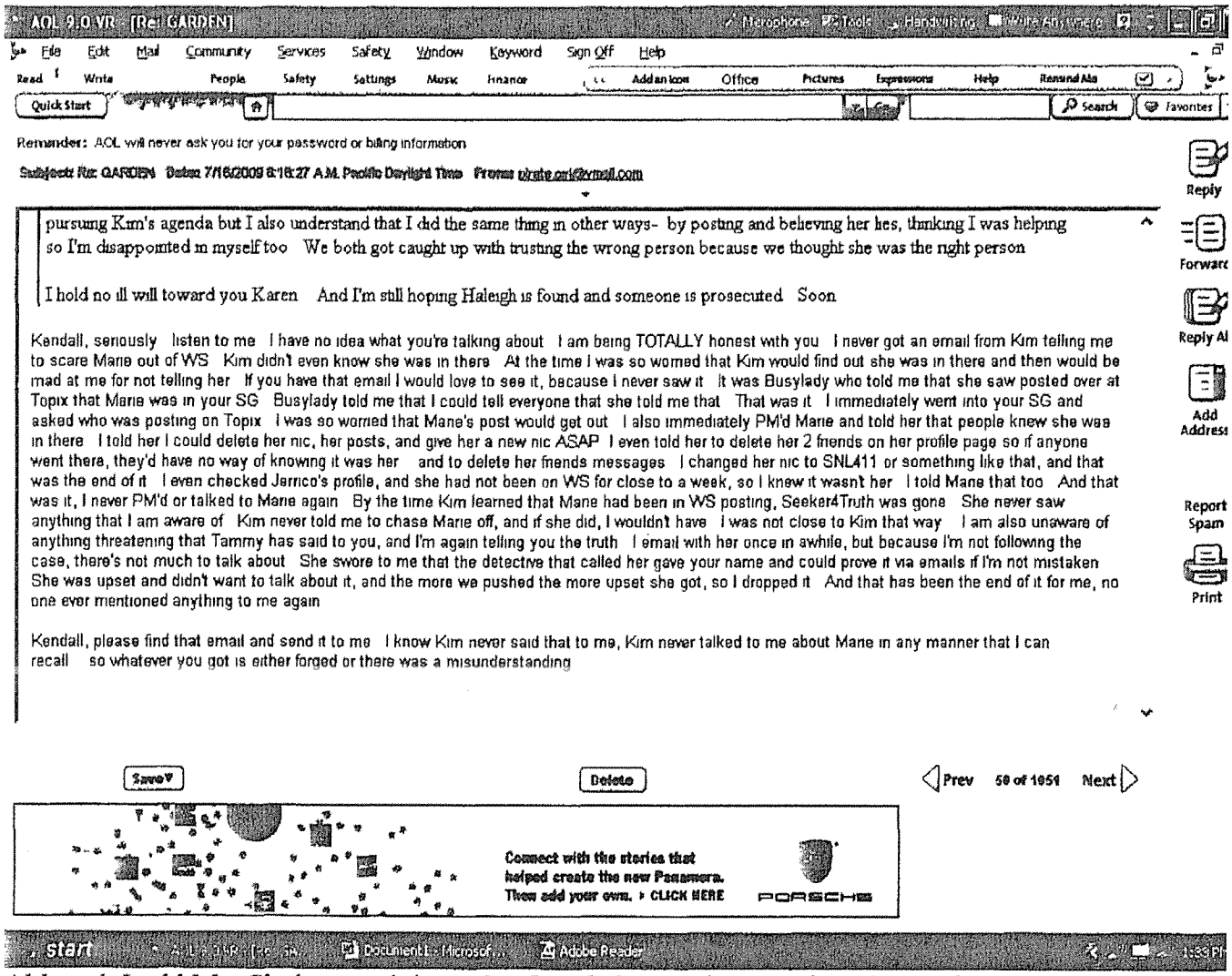
In a message dated 7/16/2009 7:45:46 A.M. Pacific Daylight Time, pirate.girl@ymail.com writes.

> When I saw the e mail that Kim wrote about having you scare marie out of websleuths I was furious. Of all people, Marie was the last person who deserved to be hurt even more. When I look at the four of us- Tammy, Kim, you and I, I really think you and I are the only two people who went into all of this for the right reasons and I think Kim was successful in convincing us that by buying into her bullshit we were helping.
>
> I think Kim is a sick and vengeful woman more focused on covering her own misdeeds than helping her client. And I think Tammy is cast from the same mold. I had my concerns about Tammy to begin with but when she started claiming that the PCSO called her I knew I was right. I have seen e mails that I supposedly wrote that have been doctored from the original version- by Tammy- who then sent them to other people who sent them to me I don't know what her problem is but she has continued to harass and threaten me via e mail since I left websleuths.
>
> It's too bad Karen because had all that not happened I'm sure we would have been great friends. I'm disappointed in the role you played in pursuing Kim's agenda but I also understand that I did the same thing in other ways- by posting and believing her lies, thinking I was helping so I'm disappointed in myself too. We both got caught up with trusting the wrong person because we thought she was the right person.

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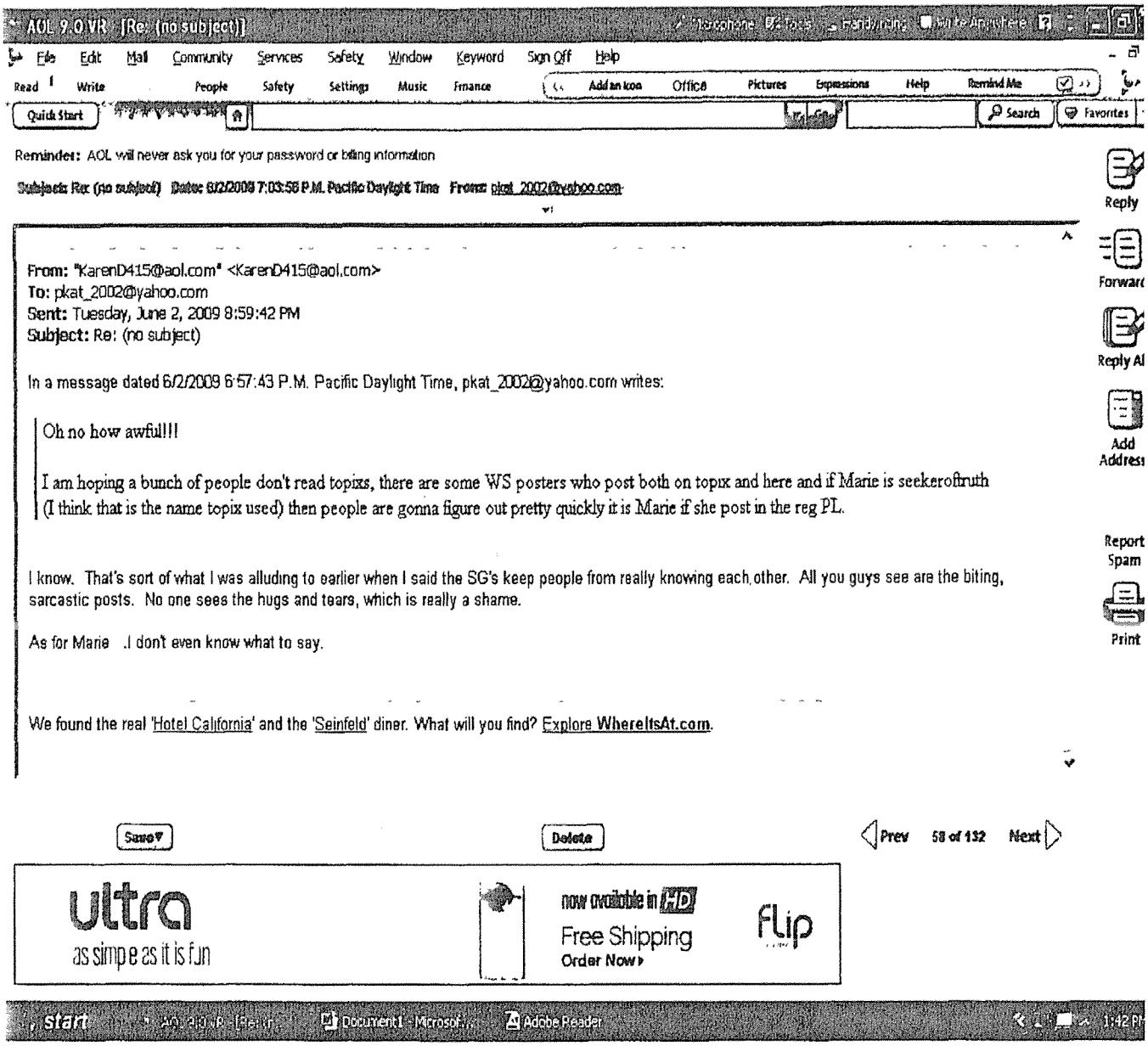
start AOL 9.0 VR - [Re: GA... Document1 - Microsof... Adobe Reader



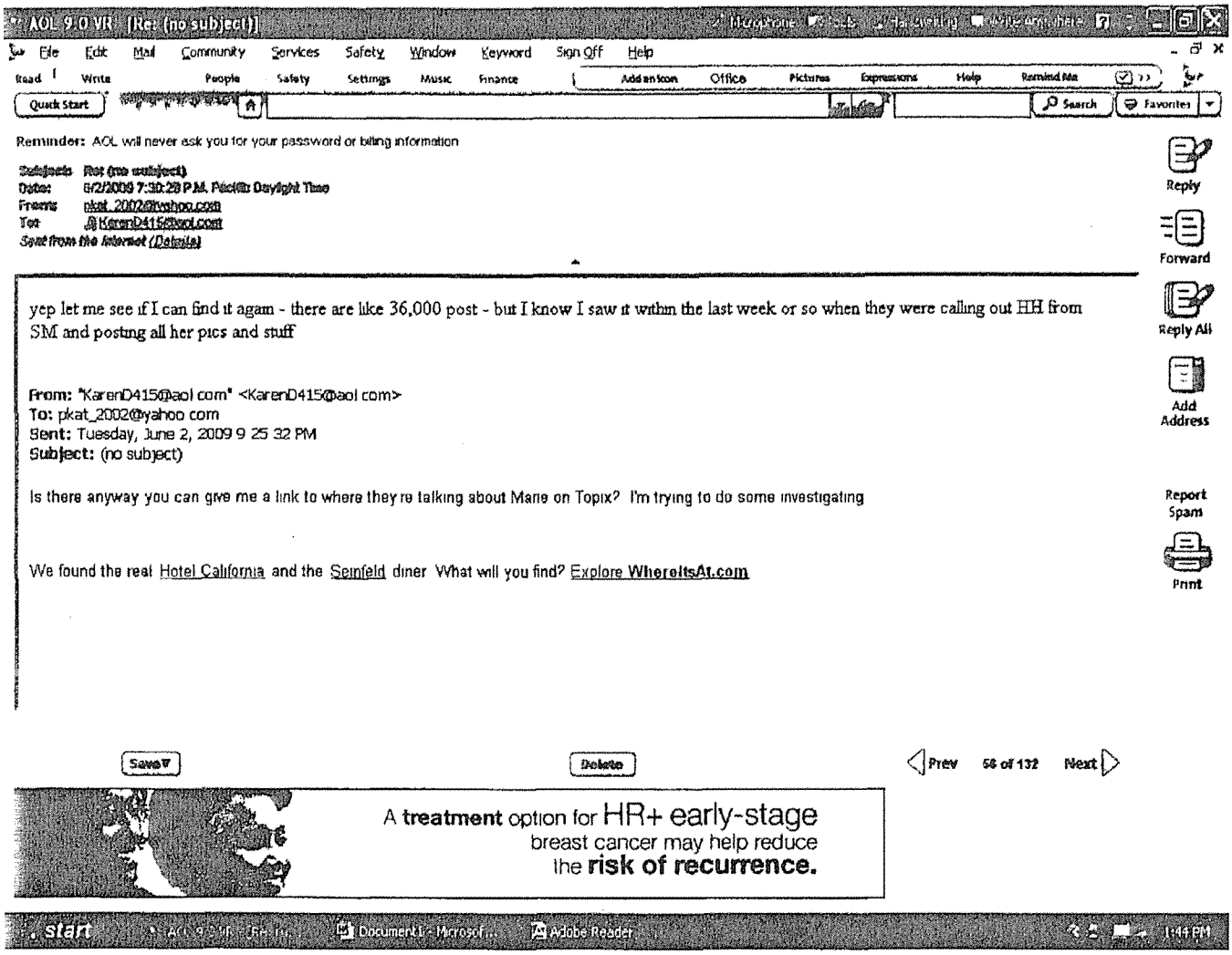
Although I told Ms. Clark several times that Busylady was the one who told me about Marie, not only did she ignore me, but she has posted this all over the internet…accusing me (and Kim Picazio) of wrong doing, totally slandering my reputation. I have never, until now, defended myself.

Going back to June when all of this occurred, here are the copies of my emails with Busylady discussing this very topic.

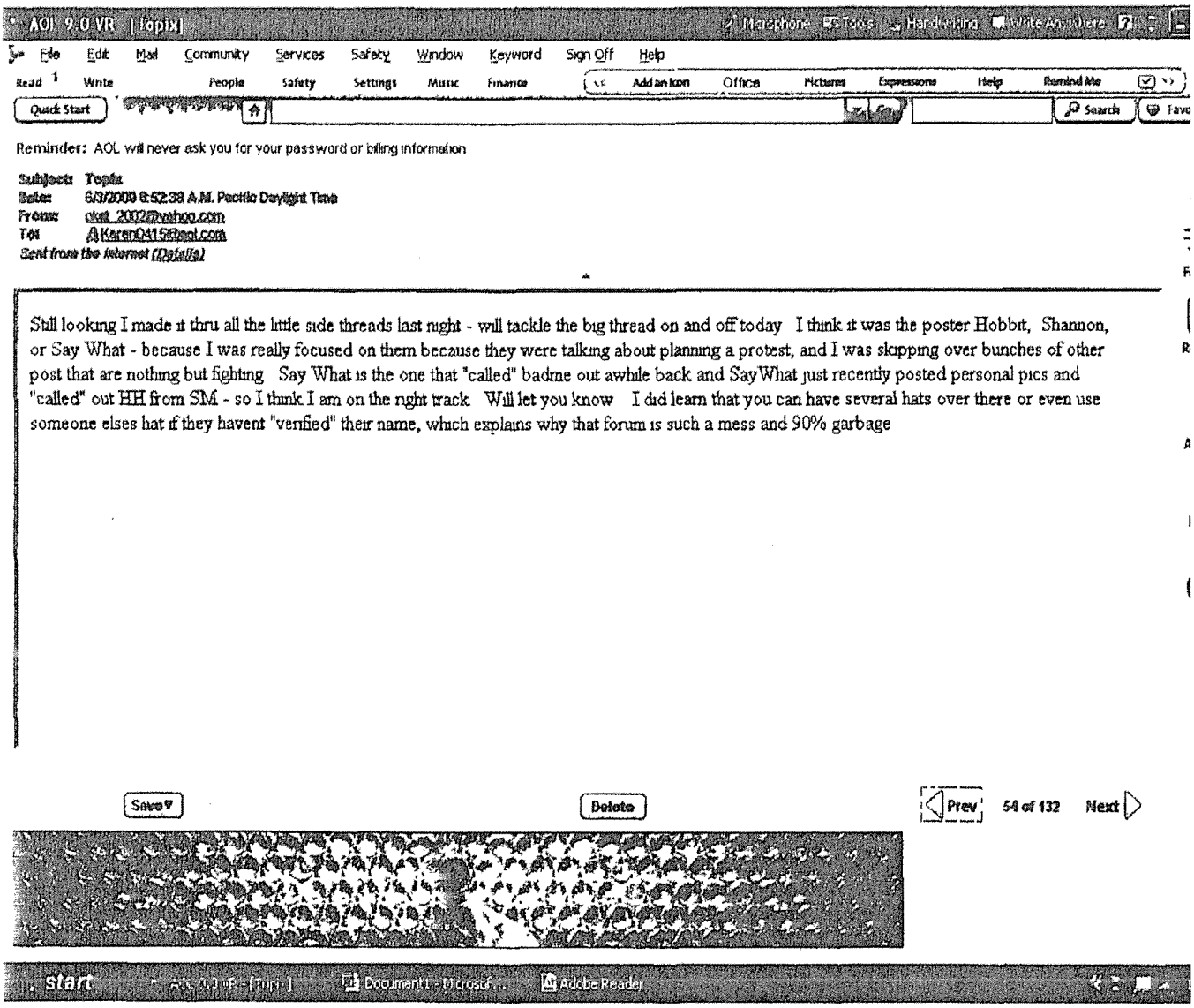
Here is the first email I received from Busylady informing me that posters were discussing Marie being on Websleuths. This is dated June 2, 2009:



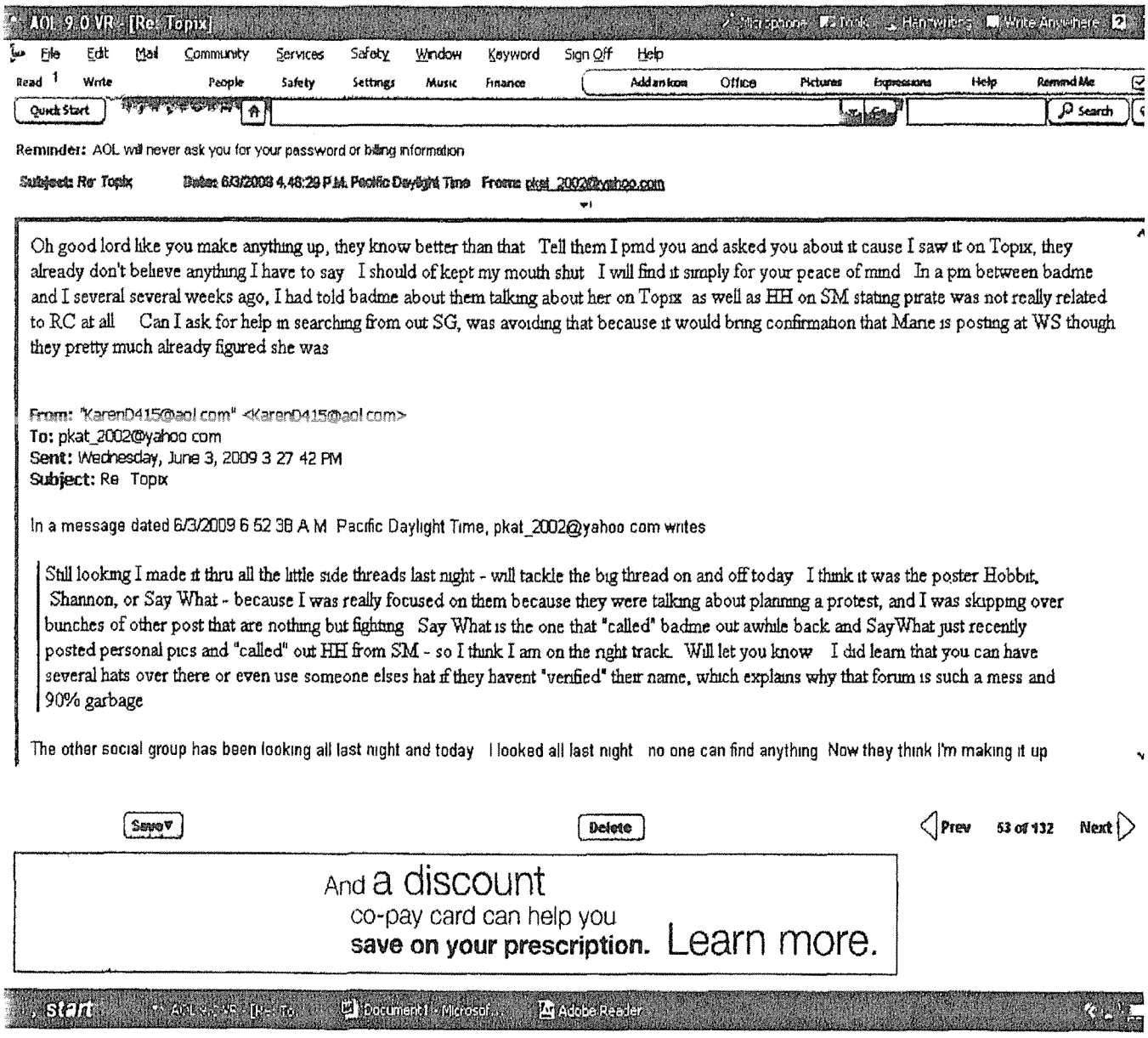
Also dated June 2, 2009, my email with Busylady where I am asking her for a link to where they're discussing Marie being on Websleuths:



This is an email sent the next day, June 3, 2009, from Busylady telling me she's still looking for the posts about Marie over on Topix:


AOL 9.0 VR [topix]
File Edit Mail Community Services Safety Window Keyword Sign Off Help
Read Write People Safety Settings Music Finance Add an Icon Office Pictures Expressions Help Remind Me
Quick Start
Search
Reminder: AOL will never ask you for your password or billing information
Subject: Topix
Date: 6/3/2009 6:52:38 A.M. Pacific Daylight Time
From: mist_2002@yahoo.com
To: AKaren0415@aol.com
Sent from the Internet (Details)
Still looking I made it thru all the little side threads last night - will tackle the big thread on and off today I think it was the poster Hobbit, Shannon, or Say What - because I was really focused on them because they were talking about planning a protest, and I was skipping over bunches of other post that are nothing but fighting Say What is the one that "called" badme out awhile back and SayWhat just recently posted personal pics and "called" out HH from SM - so I think I am on the right track Will let you know I did learn that you can have several hats over there or even use someone elses hat if they havent "verified" their name, which explains why that forum is such a mess and 90% garbage
Save
Delete
Prev
54 of 132
Next
start
Document1 - Microsof...
Adobe Reader

My reply to Busylady explaining that no one can find it and now people think I am making it up. She replies to me that I can tell people it came from her. This is dated June 3, 2009.



AOL 9.0 VR - [Re: Topix]

File Edit Mail Community Services Safety Window Keyword Sign Off Help

Read Write People Safety Settings Music Finance Add an Icon Office Pictures Expressions Help Remind Me

Quick Start Search

Reminder: AOL will never ask you for your password or billing information

Subject: Re: Topix Date: 6/3/2009 4:48:29 P.M. Pacific Daylight Time From: pkat_2002@yahoo.com

Oh good lord like you make anything up, they know better than that Tell them I pmd you and asked you about it cause I saw it on Topix, they already don't believe anything I have to say I should of kept my mouth shut I will find it simply for your peace of mind In a pm between badme and I several several weeks ago, I had told badme about them talking about her on Topix as well as HH on SM stating pirate was not really related to RC at all Can I ask for help in searching from out SG, was avoiding that because it would bring confirmation that Marie is posting at WS though they pretty much already figured she was

From: "KarenD415@aol.com" <KarenD415@aol.com>
To: pkat_2002@yahoo.com
Sent: Wednesday, June 3, 2009 3:27:42 PM
Subject: Re: Topix

In a message dated 6/3/2009 6:52:38 A.M. Pacific Daylight Time, pkat_2002@yahoo.com writes

> Still looking I made it thru all the little side threads last night - will tackle the big thread on and off today I think it was the poster Hobbit, Shannon, or Say What - because I was really focused on them because they were talking about planning a protest, and I was skipping over bunches of other post that are nothing but fighting Say What is the one that "called" badme out awhile back and SayWhat just recently posted personal pics and "called" out HH from SM - so I think I am on the right track. Will let you know I did learn that you can have several hats over there or even use someone elses hat if they havent "verified" their name, which explains why that forum is such a mess and 90% garbage

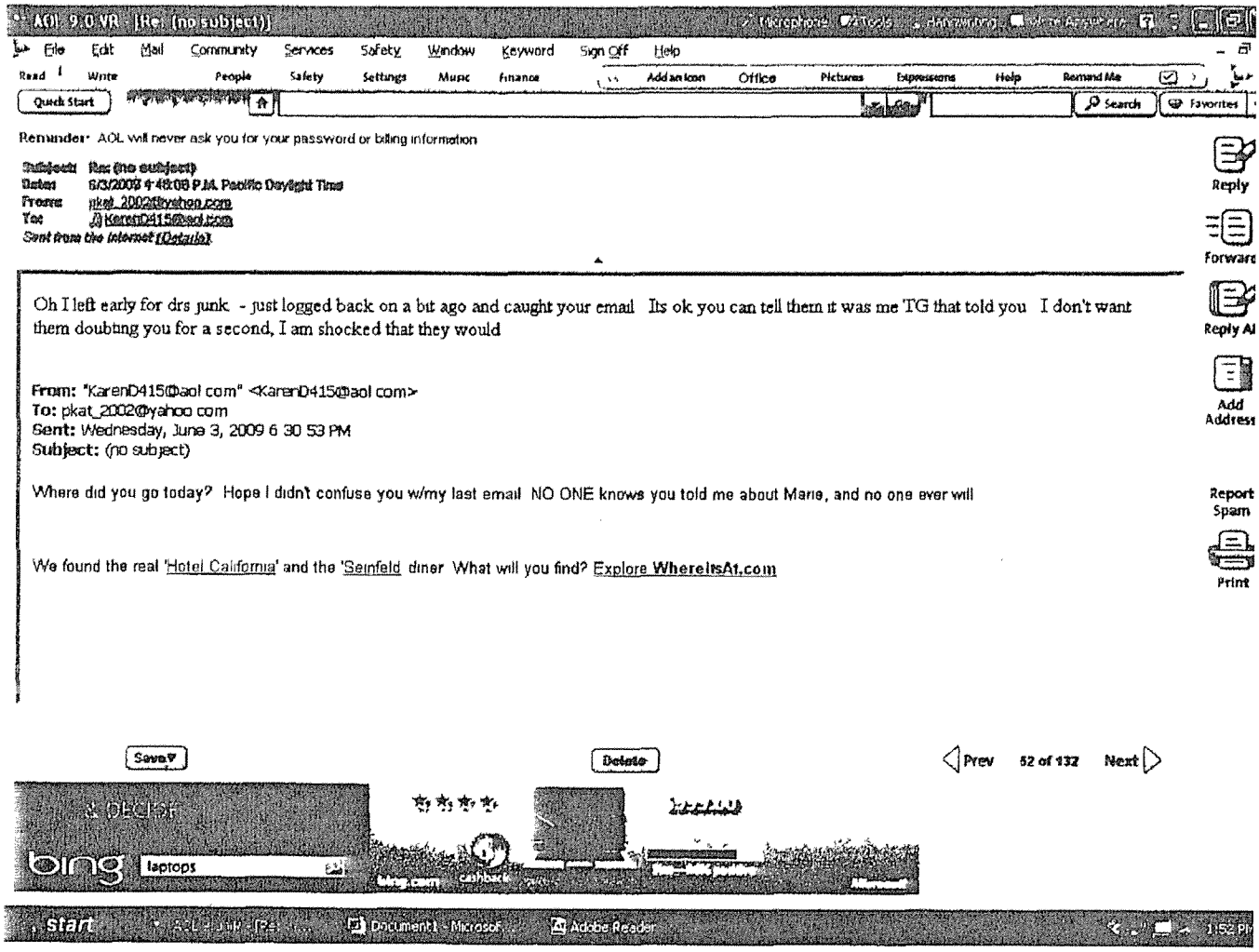
The other social group has been looking all last night and today I looked all last night no one can find anything Now they think I'm making it up

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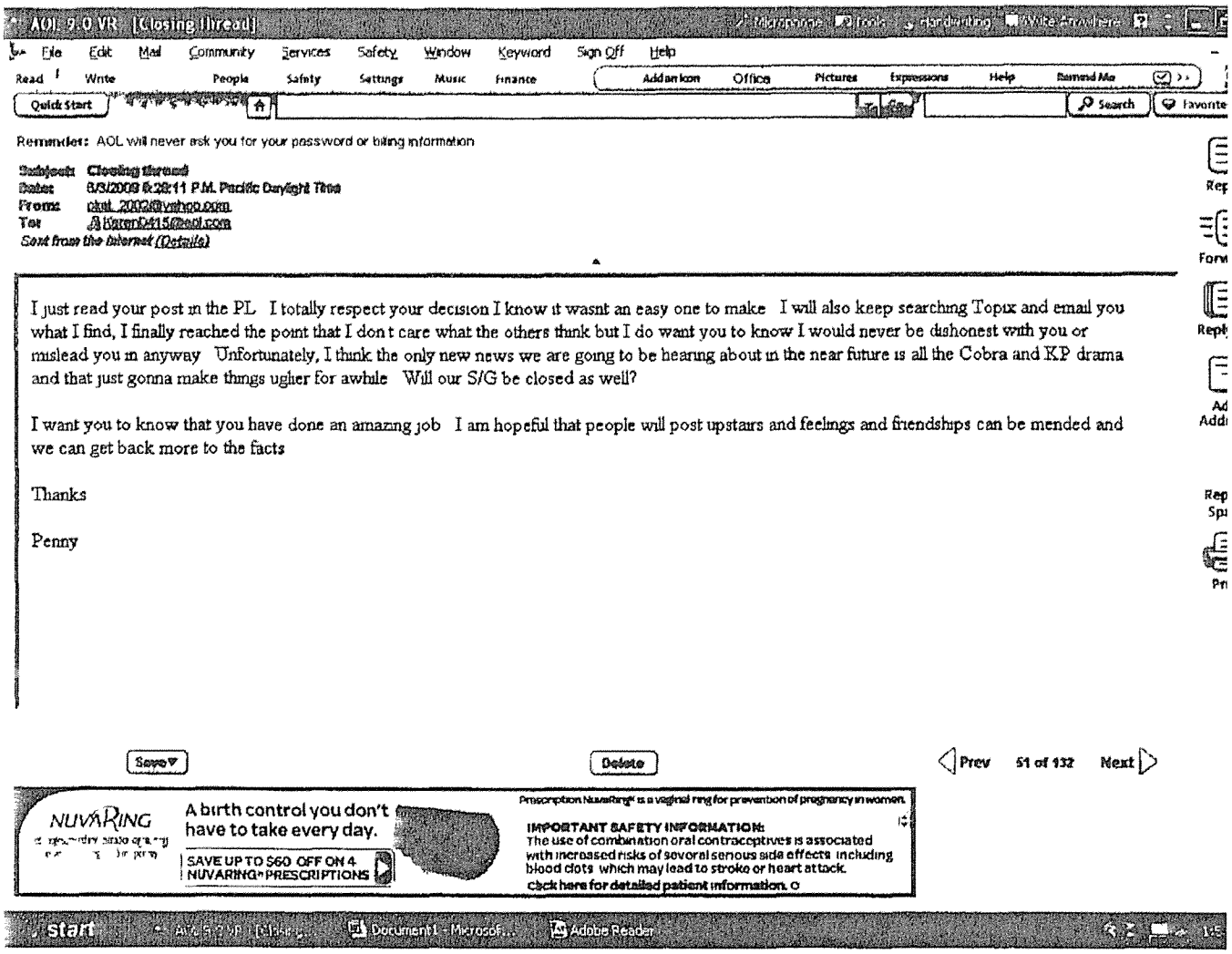
And a discount
co-pay card can help you
save on your prescription. Learn more.

Start Document1 - Microsof... Adobe Reader

Also dated June 3, 2009, my reply to Busylady stating I won't tell anyone that it was her who told me about people saying Marie was on Websleuths.



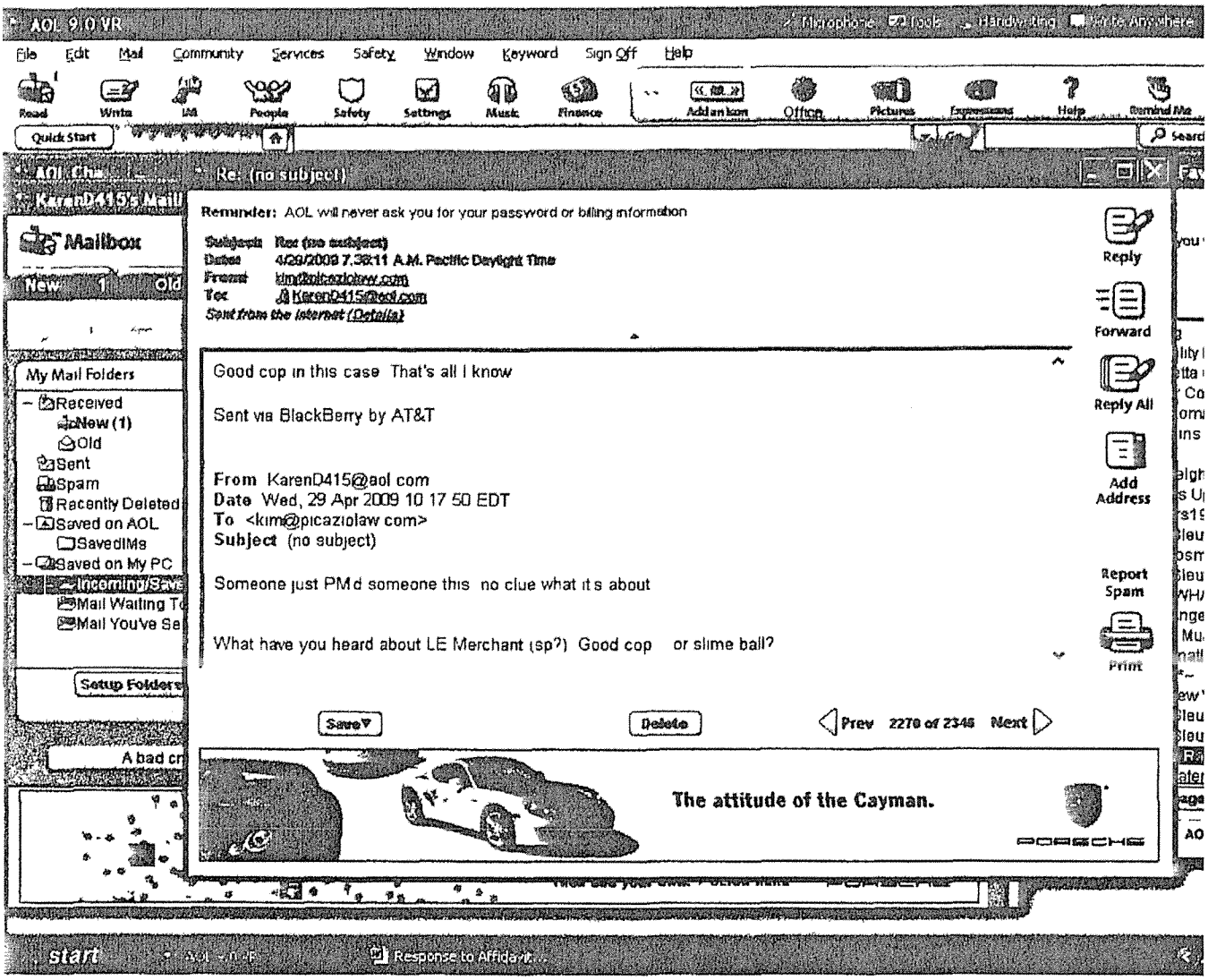
An email dated June 3, 2009 from Busylady to me where she tells me she is still looking for those posts on Topix:



This is where it ended. Busylady never found and/or emailed me links to where these posts were and I didn't pursue it further.

If you review all my emails with Ms. Clark as well as Busylady, from June thru to July, you will find everything matches, is consistent, and the truth.

Kim Picazio NEVER asked me to hide a thing from her client Crystal Sheffield or her family, including Marie Griffiths. Kim never approached me to do anything on her behalf against her client, nor would I if she had. I never saw Ms. Picazio post/say anything inappropriate, or not already out in the public. She never publicly or privately said a negative word about her clients to me. I saw the Ms. Clark stated on the affidavit that Ms. Picazio told her negative things about John Merchant, asking her (Ms. Clark), to post them publicly. I also asked Ms. Picazio about John Merchant (in an email, see below), as I was received a private message about him from someone else. Here is my email and her reply to me, dated April 29, 2009:



Also, I would like to address Ms. Clarks comment about Tammy Spratt aka Badme on Websleuths. She states in the affidavit that Ms. Spratt suffers from neurological and mental problems. Ms. Spratt is so distressed over these bogus allegations that she has asked me to speak for her. Ms. Spratt does indeed have Multiple Sclerosis but she does not suffer from any "mental" illnesses. I can attest to the fact that Ms. Spratt is a highly intelligent and very well like member of Websleuths, displaying nothing of the kind. I think it's a true testament to Ms. Clarks character that she would even mention an illness such as Multiple Sclerosis in such a derogatory, cruel manner

It is apparent that Kendall Cummings Clark is blatantly and intentionally committing perjury in an attempt to discredit Kim Picazio. I sincerely hope there are serious penalties for fraud.

Lastly, due to the serious nature of this issue, I am willing to Fed-X my laptop computer, at my expense, so that these emails can further be authenticated.

Sincerely,

Kyra Davis Sparrill

I, JEREMIAH REGAN, who after first being duly sworn, deposes and says:

(1) My name is JEREMIAH REGAN, and I am over 18 years of age. I met Crystal Sheffield in early March 2009, prior to Kim Picazio's representation of her. Kim Picazio and I had never met prior to March 2009. At that time, I was living in Hastings, Florida, a town around 20 minutes from where Haleigh Cummings went missing.

(2) When I met Crystal Sheffield, I was aware that she was the Mother of missing child, Haleigh Cummings. My Father was a local Pastor in town, and we offered Sheffield assistance and support during this tragic time in her life. Crystal lived in Baker County, Florida, nearly two (2) hours away from Putnam County, where her daughter went missing. She was staying in Putnam County while the investigation of her missing daughter was ongoing.

(3) After our first introduction, I began spending time with Crystal, and we became friends while she was staying in Putnam County. I assisted Crystal and her family, and was requested by them to assist in raising donations to help with the family's personal expenditures while staying in Putnam County. The family was actively seeking donations, and Marie Griffis organized and advertised for a Raffle for a car at a tent she set up outside the trailer park where Haleigh was last seen. Raffle tickets were sold by Marie and her friends at the tent. Marie also had T-Shirts made, imprinted with Haleigh's face, to be sold to the community at the tent. I had no involvement or knowledge with the receipt of these funds by the family. All donations were collected and kept by the family. Kim Picazio had not yet been retained by the family when these donation efforts were being organized by Marie Griffis, and her friends.

(4) I met Kim Picazio for the first time on March 13, 2009. At that time, Crystal was living in a trailer in Satsuma, Florida, lent to her by a friend. She and her family were asked to vacate the trailer in mid-March, 2009. Crystal was unemployed and did not have funds to support herself and her family, and had no place to stay in town. The family asked Kim Picazio and I to assist them in finding a central location where the family could convene in Putnam County. I found a small building to rent in town, where the family could be comfortable while the investigation for Haleigh was ongoing. Kim Picazio paid for the rent of the small building, as well as all materials to fix it up for Crystal and her family. The building was in disrepair. I personally donated my time and many hours to fix up the building for the family, put carpet on the floors, paint on the walls, remodeled the bathroom, etc. This was all done to assist the mother of a missing child, and her family.

(5) From mid-March to late April, 2009, Crystal and her family spent most of their days and some nights at the small building, nicknamed the Haleigh Bug Center. Crystal assisted me in this process, painting the building, and hanging curtains. Crystal set up the Haleigh Bug Center to her liking, and had a playpen and other provisions there so that her infant daughter, Chloe, could be comfortable. There was a cot for Crystal to sleep on. Chloe would often sleep in the playpen. Community members would come to the Center to visit Crystal and her family during the day and evenings.

(6) I did not run or "operate" the Haleigh Bug Center. After the initial set up was completed for the family, I had very little dealings with the Center, other than to convene with Crystal and her family there. There was no "personnel" at the building, other than Crystal, Marie Griffis, and their family friends who later chose to volunteer hours to keep the Center open to the public. There were no

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"executive decisions" for the Center, by me or Kim Picazio. Marie Griffis and her friends ran the Center exclusively.

(7) Crystal Sheffield and her family initially requested that I assist in fund raising for donations for Crystal. Marie Griffis wanted to put a PayPal button on the Haleigh Bug website. Kim Picazio I both informed Crystal that we thought this would not be appropriate. Marie Griffis was the primary person who organized fund raising efforts through T-Shirt Sales, and the sale of other items at the Center. Kim Picazio and I had no involvement whatsoever in these fund raising efforts, and cautioned the family about them.

(8) Kim Picazio and I also told Crystal and her mother on several occasions that it was not going to be appropriate to request donations for Crystal to remain in Putnam County. I also had several conversations with Crystal about how it would look to the public if she continued requesting donations after around 60 days from the date her child went missing. Kim and I both had extended conversations with Crystal that at some point, she should obtain employment and/or go back home to Baker County.

(9) At no time did Marie Griffis or Crystal ever request or suggest that the Haleigh Bug Center be closed, as they were actively selling Haleigh items from the building, and organizing fund raising events from there. Kim Picazio told them in my presence that she would pay for the building as long as they wanted to stay there, or until they could afford it themselves.

(10) At no time did Marie Griffis tell me or Kim Picazio that she did not "understand the use" for the Haleigh Bug Center. Marie Griffis, and her friends and family spent day after day at the Haleigh Bug Center. They organized community barbeques and other events at the building. They also sold many items printed with Haleigh's face and information. Marie kept files, records, and books at the Center regarding fund raising efforts, receipt of donations, and expenditures. Marie ran the Center like an office, and had her friends volunteer their time to keep the Center open during the day to sell bracelets and T-Shirts to the public.

(11) Kim Picazio and I did not have any involvement in what was sold at the Haleigh Bug Center. Those items were purchased by Marie, and sold by the family and the volunteers they put in place at the Center. The family kept the funds from those sales, and neither I, nor Kim Picazio were involved in any way in these sales. When we would visit the Center, Kim Picazio and I told Crystal, her family, and the volunteers that they needed to keep track of funds received, and to keep all receipts for their personal accounting.

(12) In March, 2009, Crystal specifically requested that I hold some of her donation money in an envelope for safekeeping. It contained a few hundred dollars of donation funds that community members had given her. She told me and Kim Picazio, on many occasions, in front of many family members, friends, and volunteers, that she did not want to personally hold the money in the envelope. Kim Picazio asked her on numerous occasions if she wanted the funds back, or for her mother to hold the envelope, but she insisted that I continue to hold the funds for her. Crystal and I spent a lot of time together during the month of March, 2009, and whenever she requested funds, she took it from the envelope I was holding for her.

(13) I never took or used a single dollar from the envelope for my personal use, or without proper authorization. I kept a log of each and every withdrawal that was taken from the envelope, and what the funds were used for. All expenditures were authorized directly by Crystal herself. Kim Picazio had no involvement or knowledge about the funds in the envelope or what they were used for. Instead, Crystal would give me authorization to use funds for specific things for the Center, for her own personal use, or for her Private Investigator.

(14) In early April, 2009, most of the funds had been spent by Crystal and her family. I drafted a full accounting of all funds, receipts, and expenditures, and gave the accounting to Kim Picazio and Crystal Sheffield on April 8, 2009 at the Haleigh Bug Center. A copy of the Accounting is attached to this statement. I also gave them all receipts for purchases that had been made by Crystal. After that date, I continued to spend time with Crystal and her family, and they always expressed their appreciation for my assistance with their family. I was very surprised at the allegations made in this official Inquiry, and had never been confronted by the family about any of the allegations against me, or Kim Picazio, until now.

(15) Crystal often received cash funds directly from people in the community who stopped by her family's tent, and later at the Haleigh Bug Center. I did not account for the funds, because Crystal, her mother, or their family friends, kept those funds and records themselves. Cash donations were put in Crystal's pocket, or received by Marie and her friends. I had no involvement with donations or fundraising after March 2009. I no longer volunteered at the Haleigh Bug Center after its initial set up. I stopped by the Center from time to time to visit Crystal, or to help the family with minor repairs at the building.

(16) Marie Griffis, Crystal's mother, kept records of donated funds. She also kept all receipts for all expenditures made with the donations, and ordered T-Shirts and other items to be sold at the Center. Kim Picazio and I had no involvement or specific knowledge about Marie's sales at the Haleigh Bug Center. Until the Center was closed, Marie kept the back room of the Haleigh Bug Center set up like an office for her fund raising events and sales at the Center. I did hear Kim Picazio remind Marie on several occasions that she would need to keep records of these items for her own accounting at the end of the year.

(17) Debbie Huddleston, a family friend of Marie Griffis and Crystal, was one of the volunteers at the Haleigh Bug Center. In April, 2009, Crystal informed me and Kim Picazio that she believed Debbie Huddleston was taking money from her donations and fund raising. Crystal then took the keys to the Haleigh Bug Center from Debbie Huddleston, who stopped volunteering for the Center. I was told by Crystal and her family that Debbie Huddleston and Marie Griffis had all the books and receipts of donations and their expenditures. Marie was the person who made purchases from the donations, such as T-Shirts, Pins, Bracelets, etc. Marie and Crystal's friends sold these items to the community, and kept the funds. I did not have any knowledge of the funds they received from selling these items.

(18) Kim Picazio attempted to have a trust set up for the family, but they could not decide on who would be the proper trustee for the trust. Kim Picazio was very frustrated, because she did not want the family to get into trouble for the fund raising and donations that they were receiving. I accompanied Kim Picazio to Bank of America to request the bank manager to serve this role, but she was later told that

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the bank could not serve as the Trustee. Kim Picazio, with my assistance, did everything we could to ensure that Crystal's donations were accounted for and disbursed according to the law, but reminding the family to keep records. Kim Picazio told the family on numerous occasions in my presence that she was not handling those issues for them, but would attempt to get a pro bono attorney to give them advice on the proper handling of donations.

(19) I never acted improperly in any way with regard to donations received by Crystal Sheffield. I never witnessed Kim Picazio act improperly in any way with regard to donations received by Crystal Sheffield, and never held any funds for the family. Kim Picazio and I constantly warned Crystal and her family to do things properly with regard to donations and fund raising events, and it was a major area of concern. We did not want them to get into trouble for things they were doing in this regard. It was an issue that we discussed numerous times.

(20) Crystal and her family have never expressed any concerns over my accounting of the donations that I held for Crystal, for a short time, and pursuant to her repeated requests. Crystal continues to call me as a friend, and we had a friendly conversation several weeks ago. At no time did she inform me that she had alleged impropriety on the part of me or Kim Picazio.

(21) Crystal and Marie Griffis did not insist that the Center be closed. Crystal and Marie told me that the Center was moved to Baker County after Crystal had a seizure and could not drive to Satsuma from her home where she was recuperating.

(22) I remain in contact and on good terms with Kim Picazio and her husband, Michael Picazio. Kim Picazio and I worked very hard to make sure this family was taken care of during this tragic time. We went to great lengths and volunteered hundreds of hours to making them more comfortable. The allegations that have been made are completely false, according to my personal knowledge.

FURTHER AFFIANT SAYETH NOT.

I understand that I am swearing or affirming under oath to the truthfulness of the claims made in this affidavit and that the punishment for knowingly making a false statement includes fines and/or imprisonment.

Date: October 25, 2009

JEREMIAH REGAN

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copy 2

$400 initial money from donations/bracelets from Debbie

+$200 donation (two one-hundred dollar bills)

+$100 donation (one one-hundred dollar bill)

+$140 checks (small checks from various donors) =$840

-$60 gas for cobra (upon Kim's instructions) i.e. if she wishes to keep bill, she must assist expenses

=$780

-$50 cash to crystal (upon request)

=$730

-$30 to "Todd" informant (gas) upon bills expense necessity request

=$700

-$40 gas to cobra upon necessity request

=$660

-$140 checks to crystal upon request

=$520

-$200 owed to bill (authorized by Crystal/Marie) remaining from the $500 Marie owed Bill

=$320

-$25 cash to Crystal upon request

=$295

-$155 3day @Penn motel for cobra and Mathew upon bills necessity request for emergency lodging

=$140

+$40 donations/bracelets from Debbie =$180

-$100 cash to crystal for house phone (Haleigh bug center) upon request

=$80

-$50 cash to crystal upon request 4/1/09

=$30 cash left. 4/1/09 Jeremiah Regan

STATEMENT OF WILLIAM E. STAUBS

My name is William E. Cobra Staubs, and I was a Private Investigator on the Haleigh Cummings missing child case. I was retained by Crystal Sheffield's father, Johnny Sheffield, to investigate the whereabouts of his missing granddaughter, Haleigh Cummings, and to ascertain who was responsible for her abduction. Later, I contracted with Ruby Kanger, Crystal Sheffield's step-mother. Kim Picazio and I worked closely together on the case, and have been friends for many years. I was the one who referred Kim Picazio to Crystal Sheffield for representation with the media and family law issues.

During my investigation in Satsuma, Florida, I discovered that Marie Griffis was blogging on the internet. I warned Kim Picazio to keep Crystal's family from leaking information of the ongoing investigation. It was very important that our investigative information was protected from the public and possible suspects in the small town of Satsuma, Florida. Marie Griffis and her friends continued to blog information on the internet, which disrupted my investigations, and Kim Picazio's efforts to represent Crystal Sheffield. I received emails from Marie Griffis which stated that she was going to get Kim Picazio off the case by any means, because she would not seek custody of Ronald Cummings, Jr. for her daughter, Crystal.

It has been alleged by the Bar Inquiry that Kim Picazio and I requested Kendall Clark, a/k/a Pirate Girl, to spread false information on the internet. This is outright false, and we would have never given sensitive information to a blogger. Kendall Clark constantly emailed Kim Picazio with rumors on the internet regarding the Haleigh Cummings case, asking us to confirm the rumors. Both Kim Picazio and I worked very hard in the field and in the media, and did not have time to spend blogging on the internet. Further, I stayed with Kim Picazio in the same in a hotel suite when she was in Satsuma, and I never saw her blogging on the internet.

I never called Kendall Clark while drinking, and neither did Kim Picazio. I do not drink alcohol. I never did a three way call with Kendall Clark and Kim Picazio to my knowledge. Kendall Clark, blogger Pirate Girl, called me numerous times seeking inside information in the Haleigh case to heat things up. She called me at various hours of the evening, asking for information she could put on the internet. She wanted information about any of the family members, who I was investigating for the abduction of Haleigh. Clark was more interested in the "dirt" on the family, than the facts of the disappearance of the missing child. Clark also used third parties on several occasions to make contact with me to get rumors or other information on the family members of Haleigh. She told me she was blogging information on the Internet. She told me she was blogging information on both Ronald Cummings and Crystal Sheffield to create a "drama".

At one point, it got so bad, that I took a stance, along with Kim Picazio, and we told Kendall Clark to stop divulging rumors on the internet. Disenchanted and unhappy with the cut off from information, she arranged through another blogger, Thomas Russo, a/k/a Nunzio on Websleuths, to have lunch with me in Satsuma, Florida. They asked if I would meet them with other bloggers to give them information on Kim Picazio and family members of Haleigh Cummings. At that meeting, she was interested in any negative things I knew about Crystal Sheffield. I did not give her any information. We had a friendly lunch, it was well received by everyone.

Several days later, Clark began blogging that I had "scared" her. She has constantly tried to reinvent herself by making different identities. She would hide behind different internet names, and refused to give me her real name when she asked me to meet her at lunch in Satsuma. Clark then began defaming Kim Picazio on the internet, and attempted to become close friends with Marie Griffis.

This attack on Kim Picazio is pure rhetoric. I was never asked to inflame stories by Picazio or anyone in her staff. Kim Picazio and I did not feel that Detective Merchant was corrupt, and would never ask anyone to represent he was. The conflicts between Kim Picazio and I during the Haleigh Cummings case did not result from in the false claims made by Clark about Haleigh staffer, Jeremiah Regan. These claims regarding Kim Picazio and Jeremiah Regan are false. I did not tape record any conversation with Jeremiah and Kim. Kim Picazio's husband and I remain close friends, as do Kim and I. Kim's husband never found her doing anything improper with Jeremiah or anyone else in a hotel room. These allegations by Clark are completely false, and were rumors spread on the internet, in part by Marie Griffis to get Kim off the case. Marie Griffis made these false claims against Kim during a time when Kim was representing her daughter, and would not file for custody.

Kim Picazio and I had conflicts during the case because she adamantly defended her client. During the course of the case, I personally witnessed Crystal Sheffield take illegal narcotics on several occasions. I attempted to tell Kim that her client was doing drugs. Kim Picazio did not want me releasing this information to the public. I confronted Crystal's family about her drug use, and they believed she should be put in rehab. I was present at a meeting between Crystal Sheffield and her Father, Marty Sheffield, when her father demanded Crystal go to rehabilitation for drug abuse and addiction. Crystal refused. At that time, Kim Picazio and I were naturally on different "sides" of the case, as she was representing Crystal Sheffield.

WILLIAM E. STAUBS
Licensed Private Investigator
Case Closed Investigations, Inc.

STATEMENT BY MICHAEL PICAZIO

(1) My name is Michael J. Picazio, and I am Kim Picazio's husband of nearly fifteen (15) years.

(2) My Wife represented Crystal Sheffield as a lawyer and spokesperson from mid-March 2009 to mid-July 2009. I have personal knowledge of several of the claims made by Crystal Sheffield, and Marie Griffis, contained in the Bar Inquiry.

(3) I had several conversations with Marie Griffis when she was forming the nonprofit organization, Haleigh Bug Foundation, Inc. I offered my assistance, and contacted my corporate lawyers to render advise on the proper procedures and paperwork for Marie Griffis to form this charitable organization. I also spoke with Marie, and the Department of Agriculture, about her registration for soliciting donations on behalf of Crystal, and the Haleigh Bug Foundation.

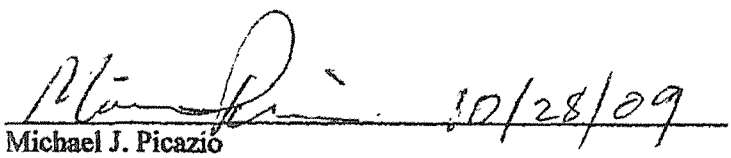
(4) In speaking with Marie, I informed her that we could have an accountant assist her at the Haleigh Bug Center, or for the Haleigh Bug Foundation, so that she could learn to keep books properly. Marie Griffis informed me, and my employee, Jerri Green, that she was a certified tax consultant. Further, she stated that her nephew was a Certified Public Accountant, and would be handling all of the books and records at the Center and for the Foundation.

(5) Marie informed me on several occasions that she had all of the books, logs, receipts, ledgers, and other documents involving the Haleigh Bug Center at her home in Baker County, after she abruptly took all of the contents of the building rented by my Wife and I for her family in Satsuma, Florida. Marie declined any assistance from me or my Wife regarding the books and records at the Haleigh Bug Center.

(6) With regard to allegations by Kendall Clark. I have never met Kendall Clark, nor do I know who she is. I would like to ensure the Florida Bar that I drove to Palatka, Florida only once during my Wife's representation of Crystal Sheffield. I did not drive to Satsuma and find my Wife doing anything improper in her hotel room, registered in my own name. I found her asleep alone, in her hotel room which I was given a key to by the front desk.

(7) My Wife and I remain on very good terms with Jeremiah Regan and his family. We are also very close friends with William E. Staubs, who lives in our hometown.

(8) The claims made by the Sheffield family and Kendall Clark are undeniably false. My Wife worked harder on the Sheffield case than I had ever seen her work. My family supported her in this endeavor, which often times took her away from her three (3) young children. My Wife, with the good blessings of our family, made a conscious decision to aid and support Ms. Sheffield, the mother of missing child Haleigh Cummings. The claims made by the family are simply malicious, and mind boggling.



10/28/09

Michael J. Picazio

EXHIBIT L