

September 24, 2013

Heidi E. Brewer, Bar Counsel  
The Florida Bar  
651 East Jefferson Street  
Tallahassee, FL 32399-2300

Re: Rebuttal to letter received on behalf of Sabrina P. Salomon; The Florida Bar File No. 2014-50,249 (17D)

Dear Ms. Brewer,

As you can see from files in the case in question, Case No. 2011-021207-FC-04, the e-mails I sent to Mrs. Salomon, and witnesses who were aware of the case, it was my intention from day one to appeal the decisions made by judge Echarte since they had not been done considering the best interest of the minor children and had been based on false and misleading information from a CPT report that was later found to be completely false.

Given that my intention was to appeal the judge's orders, which is supported by all the evidence, I believe that Mrs. Salomon committed a judgment error that cause me grave financial harm, and put me in a very difficult position to defend my minor children; most specially my older son, who was an A/B student, and who had even been named student of the month while under my custody, but who later, due in great part to judge Echarte's mishandling of the case, developed Major Depression and Post Traumatic Stress Disorder, and is now requiring psychiatric medication.

Ms. Salomon knew very well of my intentions to appeal judge Echarte's decisions. However, by recommending that it was better to agree to pay for half of opposing counsel's legal fees than to be ordered to pay the full amount by the judge, she basically prevented me from being able to appeal the judge's order, something that was totally contrary to my intention to appeal all judge's orders. It certainly would not make sense for me to appeal other orders and not to include the order in question.

Furthermore, it would be unconscionable for me to agree to pay for opposing counsel's legal fees if I did not believe that this could be modified once we showed how opposing counsel had lied and misrepresented information in court to obtain the emergency order that caused the alienation from my children. Not only that, but I believed then, and I believe now even more strongly, than to pay for opposing counsel's legal fees when they had entered false and misleading information to separate me from my kids would only encourage this type of illegal behavior, but to pay would be to facilitate this illegal behavior; something that I know can psychologically hurt other children, and is totally contrary to my values and beliefs.

Had Mrs. Salomon clearly explained that by me agreeing to pay, I was basically forfeiting my right to appeal, I would have never done so, and this is clearly supported by the evidence. This I believe was an error on her part which needs to be rectified and dealt with in a proper manner to avoid other clients from suffering in the future. I am currently facing jail time for not being able to pay for opposite counsel's fees, as a direct result of Mrs. Salomon's unclear communication, and I would like to make sure that others do not suffer the same fate. I believe that it is the Florida Bar's responsibility to protect the public from this type of professional errors. Finally, as Mrs. Salomon's response notes, which I believe she may have found out from opposite counsel, I have filed two other complaints against opposite counsel. In these cases, the Florida Bar recommended that I pursue a civil case against them.

Best regards,

Mario A. Jimenez, M.D.

Cc: Jorge Diaz-Cueto, P.A. on behalf of Mrs. Sabrina P. Salomon