

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA

MAH ADVISING, PLLC,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO.: _____
)	
SARAH GABR, MARK S. GURALNICK)	
BETTER BUSINESS BUREAU)	
DIRE WOLVES LEGAL GROUP)	
)	
Defendants.)	

EMERGENCY VERIFIED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiff MAH Advising, PLLC, hereby brings this Complaint against Sarah Gabr (“Defendant Gabr”), Mark Guralnick (“Defendant Guralnick”) and Better Business Bureau, (hereafter, “Defendant,” or “BBB”) Dire Wolves Legal Group, (“Defendant Dire Wolves Legal Group”) and in support thereof alleges as follows:

PARTIES

1. Plaintiff MAH Advising PLLC is a well-known, respected, national law firm that is a Florida Limited Liability Company with its principal place of business in Tampa, Florida.
2. Defendant Sarah Gabr is an individual and a resident of Portland, Oregon who was previously employed with the plaintiff’s firm located in Florida.
3. Defendant Dire Wolves Legal Group is a fictitious entity owned and operated by Sarah Gabr to do among other things, practice law without a license, defraud Plaintiffs clients and

induce them to believe Ms. Gabr can practice law located at 515 N. Flagler Drive, Suite 350 West Palm Beach, FL 33401.

4. Defendant Better Business Bureau (“BBB”) is a for profit corporation located in Florida.

5. Defendant Mark Guralnick is a licensed attorney in Florida with Bar number 516082.

6. BBB West appears to have no active registered agent in the State of Florida. The complaint and the summons to be served at their registered office 2655 McCormick Dr, Clearwater, FL 33759.

JURISDICTION & VENUE

7. Venue is proper in this County pursuant to Florida Statutes § 47.011 because the tortious conduct committed by Defendants against Plaintiff MAH Advising PLLC occurred in this County. The actions that give rise to this complaint took place within this jurisdiction, resulting in substantial harm to the Plaintiff’s business. Therefore, this Court has the authority to adjudicate the claims presented.

8. This is an action for damages with a value exceeding fifty thousand dollars (\$50,000.00), exclusive of interests, court costs, and attorneys’ fees.

9. All conditions precedent to the claims set forth herein have been fulfilled or waived.

A. FACTS COMMON TO ALL COUNTS

10. Plaintiff is a national law firm with an established law practice that provides legal services and represents clients in various practice areas from litigation, family law, criminal defense, civil defense, securities and corporate law among others.

11. Defendant Sarah Gabr was a former Paralegal of Plaintiff. Defendant Gabr’s employment was terminated by Plaintiff on April 17, 2024, due to her conduct at the firm.

12. Defendant BBB is a corporation that claims to be “dedicated to fostering a culture of honesty and fairness in business transactions.” BBB further claims in its website that it “is a go-to resource for making better, more informed purchasing decisions. With just a few clicks, people can find free, verified, and unbiased information on more than 5.3 million businesses in the United States and Canada at BBB.org.”¹

13. Defendant publishes profiles of business such as Plaintiff in its website. Some of the information published in the business profiles in Defendant’s website is the “BBB rating” that it gives to businesses listed on its website. Defendant, likewise, publishes whether the business has been "accredited" by BBB, consumer reviews on the business, and other background information regarding the business.

**B. DEFENDANT GABR STOLE TRADE SECRETS FROM PLAINTIFF
TO POACH CLIENTS FOR HER UNAUTHORIZED LAW PRACTICE.**

14. Shortly prior to Defendant Gabr’s termination, she had access to valuable trade secrets and proprietary and confidential business information consisting of Plaintiff’s client and prospective client lists, including particularized client information, such as client contact(s) and client contact information (e.g., phone extension(s), e-mail addresses, gained from targeted marketing efforts, individual contact and rapport with clients (the “Trade Secrets”).

15. Plaintiff has expended considerable time, effort, money, and resources to obtain, collate, develop, and maintain the Trade Secrets.

16. Defendant Gabr stole the Plaintiff’s trade secrets before her termination, using the information both for commercial gain and as an act of retaliation. Gabr utilized Plaintiff’s trade

¹ <https://www.bbb.org/all/about-bbb> (accessed as of August 21, 2024, 12:00 PM)

secrets to contact the Plaintiff's clients, attempting to persuade them to hire her as a paralegal, despite being unlicensed to practice law, instead of continuing their business with the Plaintiff.

17. The Plaintiff became aware of Defendant Gabr's conduct when it was discovered that Gabr had filed documents in the Plaintiff's case using her own e-filing, signing them as a paralegal, representing "X" clients despite being not licensed. This led to the initiation of an investigation by the Florida Bar and the FBI into Gabr's unauthorized practice of law. A true and correct copy of the Florida Bar complaint against Defendant Gabr is herein attached as **Exhibit "A."**

18. On information and belief, Defendant Gabr solicited, advertised, offered, and provided services to consumer clients of Plaintiff as a legal service company, Dire Wolves Legal Group. Defendant Gabr's unauthorized and highly unethical legal service company is marketed through the website <https://www.direwolveslegal.com/about>, which maintains reviews in Google, among others. Copies of screenshots of reviews of Defendant Gabr's website is herein attached as **Exhibit "B."**

19. Shortly after her termination, Defendant Gabr started directing business not only to herself and her Business Dire Wolves Legal Group but also to a Florida Attorney, Defendant Mark Guralnick. Defendant Gabr improperly and unlawfully used Plaintiff's Trade Secrets and communicated with Plaintiff's clients and potential clients, inducing them to contact Defendant Guralnick and to mention her by name.

20. On information and belief, Defendant Gabr sent emails or messages to Plaintiff's current and prospective clients where she made false statements against Plaintiff and offered her services to such clients. In one message, Defendant Gabr falsely claimed as follows:

*“Hi Chris, my name is Sarah, I used to work at MAH Law Firm (Attorney Michael Hurckes) as a Paralegal, and I’m reaching out to you because I’m currently helping clients who have had negative experiences with the firm, and I saw while I was there that you left a msg saying you hadn’t spoken to anyone there in over 2 weeks, that msg was from April, which I believe because it happens all the time at that firm. It had unfortunately come to my attention during my time there that the firm is engaging in unethical practices, including false advertising, scamming people out of loans with Affirm, and failing to work on clients’ cases, affecting over 550 people, causing them serious loss financially, emotionally, and legally. I would like to help you out if you haven’t been receiving the service they promised you, I’ve already helped over 30 people. If you would like to learn more about what is going on feel free to give me a call on 971-285-4387 or text me back here, as I can’t give out too much information before speaking to you directly. If you don’t want to be a part of this I completely understand, all I ask is that you please keep this confidential for the time being, as MAH’s involvement may cause harm to the people looking to get justice from them. Wishing you the best.” (See, **Exhibit - C**)*

21. On information and belief, Defendant Sarah Gabr solicited the assistance of Florida-licensed attorney Mark Guralnick to forward clients to him. Gabr allegedly did so by making false accusations of legal malpractice against the Plaintiff and promoting Defendant Guralnick's YouTube channel by sending links to increase views, while using her name as a referral to Defendant Guralnick.

Attorney Name: Mark Guralnick

Tampa Office: 813-872-9000 When you call tell them Sarah Gabr referred you regarding legal malpractice case

*Here is his YouTube channel and some related videos as well: YouTube Channel: <https://www.youtube.com/@lawofficesofmarks.gural>- (See, **Exhibit - D**)*

22. On information and belief, Defendant Gabr created fake accounts or online profiles to post, publish, or create negative reviews against Plaintiff in online websites such as Defendant BBB's website.

23. On information and belief, Defendant Gabr also used the Trade Secrets to reach out to Plaintiff's clients and potential clients, telling them false information about Plaintiff, influencing them, and inducing them to write bad reviews against Plaintiff.

24. When our investigators called Defendant Guralnick and asked for Ms. Gabr the receptionist informed us that Ms. Gaber would call them back tomorrow, confirming that Ms. Gabr and Defendant Guralnick are working together.

25. On information and belief, Defendant Guralnick intended to benefit from Defendant Gabr's actions, including her promotion of Guralnick's YouTube channel. Defendant Gabr forwarded links to Guralnick's channel to the Plaintiff's clients with the intent of increasing viewership and improperly influencing clients to engage Gabr's Dire Wolves Legal Group.

26. This conduct potentially violates Florida Bar Rules governing attorney ethics and professional conduct, indicating a breach of duties to avoid participation in unethical or illegal schemes, and exacerbates the harm to the Plaintiff's business reputation.

27. Upon Investigation Many of the Google reviews and reviews posted on Dire Wolves Legal Group are actually previous clients of Plaintiff, in which Defendant Gabr induced

to pay her for legal services without a license. One review of a previous client of Plaintiff wrote on Dire Wolves Legal Group.

*“Sarah is a lifesaver! After dealing with a fraudulent attorney, she got me to an attorney who’s filed a class action suit to get my \$ 5,000 back for services I never received. I thought I was going to have to write this money off as a loss until she entered the picture. I strongly recommend her services!!! (See, **Exhibit - E**)*

28. Ms. Gabr continued to mislead her clients by implying to them that a class action suit was filed to get the clients \$5,000 back from Plaintiff, however, no class action or legal action of any kind was ever taken against Plaintiff.

29. Upon Information and belief Defendant Gabr, a non-lawyer, referred the client to Defendant Guralnick for a fee violating professional ethics rules.

**C. BBB’S KNOWLEDGE OF CRIMINAL ACTIVITY AND FALSITY YET
PUBLISHING THE CONTENT WITH ACTUAL MALICE.**

30. Plaintiff only became aware of the BBB complaints due to clients letting them know. Plaintiff does not nor would ever believe a BBB profile is appropriate because Attorney Client Privilege would prevent it from responding to complaints publicly in the way BBB demands.

31. Beginning in 2024, BBB has published Plaintiff’s business profile and, along with it, seventeen (17) complaints against Plaintiff made by anonymous profiles claiming to be its customers.

32. Plaintiff was deeply concerned and unsure why such a rapid attack was made on the otherwise highly reputable firm when the vast majority are happy clients. Plaintiff retained a

Consultant to investigate what had occurred and what was causing this issue. The result of such investigation has confirmed Defendant Gabr induced Plaintiffs clients to leave the firm, in order to hire her services, and to leave false reviews.

33. Plaintiff, the Consultant and General Counsel for BBB have been in talks for over a month about potential solutions. BBB is aware that most of the reviews are false, BBB is aware that most are induced by Defendant Gabr's conduct, they have seen the screenshots and emails from Defendant Gabr. Plaintiff further informed BBB that the former employee is currently the subject of an FBI and Florida Bar investigation relating to Defendant Gabr's unauthorized practice of law.

34. BBB published statements that alluded to Plaintiff as being engaged in the fraudulent practice of obtaining loans for its clients without their knowledge. A publication in BBB's website claimed that "[A] loan was taken out for my aunt in the amount of \$7,500, without her knowledge and consent, and no one ever called her for weeks and months to confirm any information with her." True and correct copies of the publications in BBB's website are herein attached as **Exhibit "F."**

35. Plaintiff further informed BBB that the statements contained in the reviews are absolutely false. Plaintiff pointed out that some of the reviews were made by individuals who were not even its clients and who never retained the firm's services.

36. Plaintiff further informed BBB that it adheres to industry and ethical standards in its transactions – particularly regarding the alleged unauthorized loan financing arrangements. Plaintiff informed BBB that it is impossible for Plaintiff to obtain loan financing for its customers without the latter's express authorization, consent, and approval.

37. Plaintiff informed BBB that the reviewing customers who alleged unauthorized loan financing actually availed of Lawpay's Pay Later - a legal fee financing solution. The Pay Later financing allows law firms to receive the full invoiced amount at the start of an engagement while allowing clients to pay their legal fee loans over time in automated installments.

38. Plaintiff further informed BBB of Lawpay's application, verification, confirmation, and procedures prior to being approved for the financing. BBB was also informed that Lawpay's verification includes confirmation by e-mail or text messages, verification and confirmation of personal ID cards, and verification by phone call with facial recognition. Given the underwriting standards it is impossible for Plaintiff due what is accused of.

39. Accordingly, Plaintiff requested the removal of its business profile from BBB's website because it allowed negative consumer reviews consisting of false, fraudulent, disparaging, and defamatory remarks against Plaintiff. True and correct copies of email communications between Plaintiff and BBB reflecting the above are herein attached as **Exhibit "G."**

40. Upon Settlement discussions breaking down, BBB has ceased posting actual reviews left by clients, and mainly only posted the negative false reviews.

41. On information and belief, BBB also refuses to publish or, at the very least, cover-up or hide any positive reviews in favor of Plaintiff.

42. BBB, with knowledge of the false statements being made, gave plaintiff an F review. Defendant BBB further republished the false statements contained in the defamatory reviews. To date over 15 clients have had their favorable reviews refused to be published on BBB's site, nor has any attempt been made to contact them.

43. On July 26, 2024, Plaintiff sent a demand letter to BBB demanding BBB to take down Plaintiff's profile in its website, the negative reviews published, and the negative rating against Plaintiff. True and correct copies of the letter sent to BBB through registered agent via certified mail and e-mailed to Counsel for BBB is herein attached as **Exhibit "H."**

44. To this date, BBB has refused to comply with Plaintiff's legal demand and the defamatory statements remain posted online.

45. Plaintiff has suffered damages due to Defendant Gabr's unlawful acts and Defendant BBB's publication of defamatory reviews which caused the termination of retainer agreements between Plaintiff and its clients, interfered with potential clients retention of Plaintiff's services, and caused the cancellation of contracts and services between Plaintiff and its payment processors.

COUNT I

Temporary and Permanent Injunction

(Defendant BBB)

46. Plaintiff repeats and incorporates by reference all of the allegations set forth in Paragraphs 1 to 45 above.

47. Plaintiff will suffer irreparable harm if Defendant BBB does not take down the disparaging, false, and defamatory reviews against Plaintiff as well as Plaintiff's profile from its website.

48. Plaintiff will suffer irreparable harm if Defendant BBB is not enjoined from continuing to post the disparaging, false, and defamatory reviews against Plaintiff.

49. Plaintiff has no adequate remedy at law.

50. Plaintiff has a substantial likelihood of success on the merits.

51. A temporary and permanent injunction will serve the public interest.

WHEREFORE, Plaintiff respectfully requests this Court to enter a temporary **injunction** and a permanent **injunction** against Defendant BBB directing it to take down the false and negative reviews from its website, directing it to take down Plaintiff's profile from its website, and enjoining it from further posting or publishing Plaintiff's profile, the false and defamatory reviews, and from posting any information relating to Plaintiff.

COUNT II

Temporary and Permanent Injunction

(Defendant Gabr)

52. Plaintiff repeats and incorporates by reference all of the allegations set forth in Paragraphs 1 to 45 above.

53. Plaintiff will suffer irreparable harm if a temporary and permanent injunction are not granted requiring Defendant Gabr to return the Trade Secrets and she is not enjoined from processing, utilizing, or otherwise making use of the Trade Secrets.

54. Plaintiff will suffer irreparable harm if Defendant Gabr is not enjoined from continuing to communicate, contact, or reach out to Plaintiff's clients and potential clients.

55. Plaintiff has no adequate remedy at law.

56. Plaintiff has a substantial likelihood of success on the merits.

57. A temporary and permanent injunction will serve the public interest.

WHEREFORE, Plaintiff respectfully requests this Court to enter a temporary **injunction** and a permanent **injunction** against Defendant Gabr enjoining her from processing, utilizing, or otherwise making use of the Trade Secrets and from continuing to communicate, contact, or reach out to Plaintiff's clients and potential clients.

COUNT III

Defamation against Defendant BBB

58. Plaintiff repeats and incorporates by reference all of the allegations set forth in Paragraphs 1 to 45 above.

59. Defendant BBB published false and defamatory statements against Plaintiff on the internet by publishing the supposed customer review on the BBB website which is viewable to at least one third party.

60. The negative reviews published in the BBB website are false and defamatory and Defendant knows it to be false.

61. BBB published the false and negative reviews knowing that the same were made by Defendant Gabr or at least improperly made through her efforts and improper use of Plaintiff's Trade Secrets.

62. Defendant BBB's publication of the defamatory reviews against Plaintiff were made willfully with intent to harm Plaintiff or to induce Plaintiff to obtain BBB accreditation for a price and as a result of Settlement talks failing.

63. Defendant's publication of the defamatory reviews against Plaintiff were made with knowledge of their falsity considering that it has been sufficiently informed of the truth surrounding the negative reviews. However, Defendant still refuses to remove the negative reviews it knows are false.

64. Defendant's publication of defamatory reviews has caused damage to, and continues to cause damage to Plaintiff by way of damaged business interests and reputation, lost income, and lost opportunities.

65. Defendant's publication of defamatory reviews caused the termination of retainer agreements between Plaintiff and its clients, interfered with potential clients retention of Plaintiff's services, and caused the cancellation of contracts and services between Plaintiff and its payment processor.

66. Defendant's actions have caused the termination of Plaintiff's contractual relationship with banks and financial partners.

WHEREFORE, Plaintiff respectfully requests this Honorable Court to enter judgment for damages including, but not limited to, compensatory damages, court costs, interest, and attorneys' fees pursuant to Fla. Stat. § 57.105, if appropriate, and such other and further relief as the Court deems just and proper.

COUNT IV

Defamation against Defendant Gabr

67. Plaintiff repeats and incorporates by reference all of the allegations set forth in Paragraphs 1 to 45 above.

68. Defendant Gabr published false and defamatory statements against Plaintiff on the internet by making anonymous user accounts, submitting false statements as complaints to BBB, and causing the publication of such false statements in the BBB website which is viewable to at least one third party.

69. Defendant Gabr published false and defamatory statements against Plaintiff by sending e-mails and text messages containing false statements and grave misrepresentations to Plaintiff's clients and prospective clients.

70. The negative reviews published in the BBB website are false and defamatory and Defendant knows it to be false.

71. Defendant's publication of the defamatory reviews against Plaintiff were made willfully with intent to harm Plaintiff, to induce Plaintiff to directly pay money to Defendant Gabr, or to poach Plaintiff's clients for her own benefit.

72. Defendant knows that the defamatory statements and reviews are false.

73. Defendant's publication of defamatory reviews has caused damage to, and continues to cause damage to Plaintiff by way of damaged business interests and reputation, lost income, and lost opportunities.

74. Defendant's publication of defamatory reviews caused the termination of retainer agreements between Plaintiff and its clients, interfered with potential clients retention of Plaintiff's services, and caused the cancellation of contracts and services between Plaintiff and its payment processor.

75. Defendant's actions have caused the termination of Plaintiff's contractual relationship with banks and financial partners.

WHEREFORE, Plaintiff respectfully requests this Honorable Court to enter judgment for damages including, but not limited to, compensatory damages, court costs, interest, and attorneys' fees pursuant to Fla. Stat. § 57.105, if appropriate, and such other and further relief as the Court deems just and proper.

COUNT V

Tortious Interference against all the Defendants

76. Plaintiff repeats and incorporates by reference all of the allegations set forth in Paragraphs 1 to 45 above.

77. Plaintiff enters into contracts with its customers through a retainer agreement for its legal services under which agreement Plaintiff maintains legal rights.

78. Defendants had knowledge of these contracts.

79. Defendants intentionally and unjustifiably interfered with these contractual relationships by intentionally disparaging and defaming Plaintiff through the publication of false, unfounded and defamatory reviews against Plaintiff.

80. Defendants' unlawful conduct resulted in the termination of Plaintiff's contractual relationships with its customers.

81. As a result of Defendants' intentional interference, Plaintiff has suffered and continues to suffer damage by way of damaged business interests and reputation, lost income, and lost opportunities.

82. Defendants' intentional interference caused the termination of retainer agreements between Plaintiff and its clients, interfered with potential clients retention of Plaintiff's services, and caused the cancellation of contracts and services between Plaintiff and its payment processor.

83. Defendant's actions have caused the termination of Plaintiff's contractual relationship with banks and financial partners.

WHEREFORE, Plaintiff respectfully requests this Honorable Court to enter judgment for damages including, but not limited to, compensatory damages, court costs, interest, and attorneys' fees pursuant to Fla. Stat. § 57.105, if appropriate, and such other and further relief as the Court deems just and proper.

COUNT VI

Misuse Of Referral And Personal Influence; Collusion against Defendant Gabr and Defendant Guralnick

84. Plaintiff repeats and incorporates by reference all of the allegations set forth in Paragraphs 1 to 45 above.

85. Defendant Gabr used her name as a referral to Attorney Guralnick, intending to influence clients to retain his services.

86. This misuse of referral and influence, combined with defamatory statements and promotional activities, constitutes a breach of the Florida Bar Rules of Professional Conduct, which mandate that attorneys avoid dishonest, fraudulent, or misleading practices.

87. Defendant Guralnick knowingly accepted client referrals from Defendant Gabr, who was engaged in unethical practices.

88. Such acceptance of referrals from Gabr indicates collusion, representing a violation of Florida Bar Rules and ethical standards governing attorney conduct.

WHEREFORE, the Plaintiff asserts that the actions of both Defendants represent a severe breach of legal and ethical duties, resulting in substantial harm to the Plaintiff's business reputation. The Plaintiff seeks compensatory damages for reputational and financial harm, pursuant to Florida Statutes § 768.72 and § 768.81, injunctive relief to prevent further misconduct, as provided under Florida Statutes § 501.211, and an award of litigation costs and attorneys' fees in accordance with Florida Statutes § 501.2105. The Plaintiff requests any additional legal and equitable relief deemed just and appropriate by the Court.

COUNT VII

Violation of Florida's Uniform Trade Secrets Act, §§ 688.001-009, FLA. STAT. against

Defendant Gabr

89. Plaintiff repeats and incorporates by reference all of the allegations set forth in Paragraphs 1 to 45 above.

90. Plaintiff has built its reputation and business as a law firm for years. Plaintiff has expended considerable time, effort, money, and resources to obtain, collate, develop, and maintain the Trade Secrets.

91. Defendant Gabr was aware that certain information and knowledge, particularly, Plaintiff's client and prospective client list that she had access to, was receiving from Plaintiff, or exposed to during the course of her employment with Plaintiff were Plaintiff's trade secrets.

92. Defendant Gabr, with the intent to increase the viewership of Defendant Guralnick's YouTube channel, forwarded links to the channel to Plaintiff's clients. This conduct, coupled with the false accusations of legal malpractice against the Plaintiff, is alleged to be intended to divert clients and harm the Plaintiff's reputation. Such actions may constitute an unfair and deceptive trade practice in violation of Florida's Deceptive and Unfair Trade Practices Act (FDUTPA), Florida Statutes Chapter 501.

93. Plaintiff keeps the Trade Secrets in such a manner that only its employees who had a need to use them have access to it, and Plaintiff takes reasonable measures to preserve their secrecy.

94. Defendant Gabr misappropriated by improper means, including but not limited to, conversion, theft, and/or misrepresentation, Plaintiff's Trade Secrets in violation of Florida Statutes Chapter 688.

95. Defendant Gabr's violation of the Uniform Trade Secrets Act was intentional, malicious, and willful.

96. As a result of Defendant Gabr's misappropriation of Plaintiff's Trade Secrets, Plaintiff has been damaged.

97. If Defendant Gabr's unlawful actions in violation of the Uniform Trade Secrets Act are not temporarily and permanently enjoined, Plaintiff will continue to be irreparably injured and will have no adequate remedy at law.

98. The effects of Defendant Gabr's unlawful taking of Plaintiff's Trade Secrets may be far-reaching and are extremely difficult and/or impossible to ascertain due to their unique nature. Therefore, such damages are of a character which cannot be readily, adequately, and completely estimated or repaired in dollars and cents.

99. All conditions precedent to the maintenance of this action have been performed or fulfilled.

WHEREFORE, Plaintiff respectfully requests this Court to:

- a. enter a temporary **injunction** and a permanent **injunction** against Defendant Gabr enjoining her from processing, utilizing, or otherwise making use of the Trade Secrets and from continuing to communicate, contact, or reach out to Plaintiff's clients and potential client; and
- b. enter judgment for damages including, but not limited to, compensatory damages, court costs, interest, and attorneys' fees pursuant to Fla. Stat. § 57.105, if appropriate, and such other and further relief as the Court deems just and proper.

COUNT VIII

Violation of Florida Deceptive and Unfair Trade Practices Act

against Defendant BBB

100. Plaintiff repeats and incorporates by reference all of the allegations set forth in Paragraphs 1 to 45 above.

101. The Florida Deceptive and Unfair Trade Practices Act (“FDUTPA”) renders unlawful unfair methods of competition, unconscionable acts or practices, and unfair or deceptive acts or practices in the conduct of any trade or commerce. Section 501.204, Fla. Stat.

102. Promotion of Attorney Guralnick’s YouTube Channel: - Defendant Gabr has forwarded links to Attorney Guralnick’s YouTube channel to Plaintiff’s clients, with the intent of increasing the channel’s viewership. This conduct, in conjunction with the false accusations against Plaintiff, may constitute an unfair and deceptive trade practice under Florida’s Deceptive and Unfair Trade Practices Act (FDUTPA), Florida Statutes Chapter 501.

103. Plaintiff, its customers and potential customers, and viewers of Defendant’s website are consumers as defined by Section 501.203, Fla. Stat.

104. At all relevant times, Defendant solicited, advertised, offered, and provided services to consumer businesses through selling its memberships by advertising accreditation as a benefit to such businesses. Based on information and belief, Defendant makes most of its revenue by charging businesses to be “accredited.”

105. At all relevant times, Defendant solicited, advertised, offered, and provided services to customers or potential customers of consumer businesses to its website whether BBB accredited or not.

106. Defendant engages in deceptive and unlawful trade practice when it represents to consumer businesses and customers of such businesses who rely on its website that it has an unbiased rating system and that it conducts an investigation into the businesses for which it rates, when, in fact, it does not.

107. Defendant intends for the business profiles of companies listed in its website, including its ratings of businesses, the reviews posted for such business, and other information

therein to influence or otherwise affect the spending, purchasing, or decision-making of consumers and potential customers of such businesses.

108. Defendant engages in deceptive and unlawful trade practice when it fails to disclose that its rating system is not transparent. Defendant does not appropriately disclose the relation between its grading system and the grades businesses receive in its website.

109. Defendant engages in deceptive and unlawful trade practice when it fails to disclose to consumers who rely on its website that “accreditation” with Defendant plays a significant role in grading, evaluating, and publishing the business profile of consumers such as Plaintiff.

110. Defendant engages in deceptive and unlawful trade practice when it fails to disclose that it does not conduct a fair investigation of the unaccredited businesses (such as Defendant) listed in its website.

111. Defendant engages in deceptive and unlawful trade practice, when it published the negative and defamatory reviews against Plaintiff which contains false and misleading representations of fact.

112. Defendant’s actions have caused damage to potential customers and current clients of Plaintiff who were affected by Plaintiff’s negative and defamatory reviews in its website.

113. Defendant’s actions have caused damage to potential customers and current clients of Plaintiff to the extent that they relied on the negative and defamatory reviews and the false misrepresentations made against Plaintiff’s profile to terminate their retainer agreements with Plaintiff or were otherwise negatively affected by such misrepresentations.

114. Defendant’s unfair and deceptive practices caused the termination of retainer agreements between Plaintiff and its clients, interfered with potential clients retention of

Plaintiff's services, and caused the cancellation of contracts and services between Plaintiff and its payment processor.

115. Defendant's actions have caused the termination of Plaintiff's contractual relationship with banks and financial partners.

116. Defendant's actions have caused Plaintiff damage in an amount to be proven at trial.

WHEREFORE, Plaintiff respectfully requests this Honorable Court to enter judgment for damages including, but not limited to, compensatory damages, court costs, interest, and attorneys' fees pursuant to Fla. Stat. § 57.105, if appropriate, and such other and further relief as the Court deems just and proper.

COUNT XIX

Violation of Florida Deceptive and Unfair Trade Practices Act against Defendant Gabr and Defendant Guralnick

117. Plaintiff repeats and incorporates by reference all of the allegations set forth in Paragraphs 1 to 45 above.

118. The Florida Deceptive and Unfair Trade Practices Act ("FDUTPA") renders unlawful unfair methods of competition, unconscionable acts or practices, and unfair or deceptive acts or practices in the conduct of any trade or commerce. Section 501.204, Fla. Stat.

119. Defendant Gabr forwarded links to Attorney Guralnick's YouTube channel to Plaintiff's clients, disparaging and making false statements and misrepresentations against Plaintiff, for the purpose of increasing the Youtube channel's views and, ultimately, Defendant Guralnick's clients.

120. Plaintiff, its customers and potential customers, are consumers as defined by Section 501.203, Fla. Stat.

121. At all relevant times, Defendant Gabr solicited, advertised, offered, and provided services to consumer clients of Plaintiff as a legal service company, Dire Wolves Legal Group. Defendant Gabr's unauthorized and highly unethical legal service company is marketed through the website <https://www.direwolveslegal.com/about>, which maintains reviews in Google, among others. **See Exhibit E.**

122. At all relevant times, Defendant Gabr solicited, advertised, offered, and provided services to consumer clients of Plaintiff to promote and poach its clients in favor of Defendant Guralnick.

123. Defendants Gabr and Guralnick engaged in deceptive and unlawful trade practice when they made false statements, and gross misrepresentations regarding Plaintiff's law firm to Plaintiff's customers and potential customers by sending text messages, emails, or otherwise communicating with such customers.

124. Defendants Gabr and Guralnick engages in deceptive and unlawful trade practice, when they caused the publication of the negative and defamatory reviews against Plaintiff which contains false and misleading representations of fact in BBB.

125. Defendant's actions have caused damage to potential customers and current clients of Plaintiff who were affected by Plaintiff's negative and defamatory reviews in its website.

126. Defendant's actions have caused damage to potential customers and current clients of Plaintiff to the extent that they relied on the negative and defamatory reviews and the false misrepresentations made against Plaintiff's profile to terminate their retainer agreements with Plaintiff or were otherwise negatively affected by such misrepresentations.

127. Defendant's unfair and deceptive practices caused the termination of retainer agreements between Plaintiff and its clients, interfered with potential clients retention of Plaintiff's services, and caused the cancellation of contracts and services between Plaintiff and its payment processor.

128. Defendant's actions have caused the termination of Plaintiff's contractual relationship with banks and financial partners.

129. Defendant's actions have caused Plaintiff damage in an amount to be proven at trial.

130. WHEREFORE, Plaintiff respectfully requests this Honorable Court to enter judgment for damages including, but not limited to, compensatory damages, court costs, interest, and attorneys' fees pursuant to Fla. Stat. § 57.105, if appropriate, and such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands trial by jury on all issues that are triable.

Dated: August 22, 2024.

MAH ADVISING PLLC
By: /s/ Michael A. Hurckes
Michael A. Hurckes, Esq.
Florida Bar No. 1040918
3001 N Rocky Point Dr East,
Suite 200
Tampa, FL 33607
Tel.: (917) 791-0636

Attorney for Plaintiff

VERIFICATION

STATE OF FLORIDA
COUNTY OF Mantatee

Danielle Menchen, who, being duly sworn, deposes and says:

1. I am the Head of Operations employed by the Plaintiff in the above-styled cause and am authorized to execute this verification on its behalf.
2. I have read the foregoing Complaint and know the contents thereof.
3. The statements contained in the Complaint are true and correct to the best of my knowledge and belief.

FURTHER AFFIANT SAYETH NAUGHT.

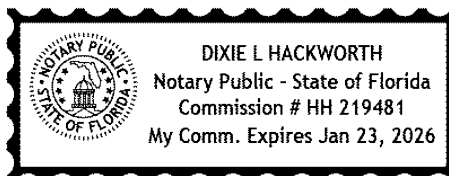
Dated this 22nd day of August, 2024.

Danielle Menchen
Head of Operations
MAH ADVISING PLLC

Sworn to (or affirmed) and subscribed before me by means of online notarization, this 22nd day of August, 2024, by **Danielle Menchen**, who is personally known to me or has produced Florida Drivers License as identification.

Dixie L Hackworth

Notary Public, State of Florida
Printed Name: Dixie L Hackworth, Online Notary



The notarial act was an online notarization, along with multi-factor authentication and audio/video recording.

EXHIBIT A

THE FLORIDA BAR
Unlicensed Practice of Law
Complaint

Your Name: Michael A. Hurckes	Nonlawyer's Name: Sarah Gabr
Address: 3030 N. Rocky Point Drive W., #150	Address: 3750 S River Pkwy. Apt. 453
City: Tampa	City: Portland
State & Zip: Florida 33607	State & Zip: Oregon 97239
Telephone:	Telephone: +1 (707) 285-0109
Email: mh@mahadvising.com office@mahadvising.com	Email: sarahgabr@icloud.com

COMPLAINT AGAINST SARAH GABR FOR UNAUTHORIZED PRACTICE OF LAW

1. I am a Florida¹ and New York² licensed lawyer in good standing. I am managing partner of MAH Advising PLLC (the “Law Firm”), a law firm with office addresses at 3030 N. Rocky Point Drive W., #150 Tampa, FL 33607 and in One World Trade Center, Fulton St #8500, New York, NY. My Law Firm has an established law practice with most of the clients being based out of Florida.
2. On April 4, 2024, MAH Advising PLLC hired Sarah Gabr (Nonlawyer) as an independent contractor to act as a paralegal / legal assistant for my firm.
3. On April 11, 2024, Nonlawyer’s services at the Law Firm were terminated due to failure to meet job requirements.

¹ Bar #1040918
² Registration No. 5910898

4. After termination of her services, Nonlawyer started reaching out to my clients in Florida and started defaming my firm and making offers to provide legal services, while not being licensed in Florida or even having a law degree or a paralegal license in Oregon. Nonlawyer contacted my clients Joseph Leathers, Katelyn Myers, Moline Luscar and Sheila Howard and offered her legal services by inducing clients to terminate their engagement with the Law Firm. Nonlawyer is engaged in the unlicensed practice of law in Florida as she is not an attorney licensed in Florida and is offering services to hire, direct, manage, control, and supervise Florida lawyers on behalf of litigants defending in Florida litigation when Nonlawyer is not a party to the litigation.
5. On April 26, 2024 Nonlawyer contacted the Court in Mr. Leather's case³ and informed the court that Nonlawyer submitted and e-filed a motion for continuance on behalf of Mr. Joseph Leathers, and Ms. Marlena Leathers. The email from Judicial Assistant to me and the motion to continuance filed by Nonlawyer is attached as **Annexure-A**. Nonlawyer is engaged in the unlicensed practice of law in Florida as she not an attorney not licensed in Florida and is providing legal advice, strategy and services to parties in litigation pending in Florida in which Nonlawyer is not a party.
6. Nonlawyer is filing pleadings on behalf of litigants and contacting courts on behalf of litigants and is engaged in unlicensed practice of law. Nonlawyer continues to cause defame my firm

³ Case No.: 16-2023-CA-011483-XXXX-MA, IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT IN AND FOR DUVAL COUNTY, FLORIDA, DENNIS J. LAFER, AS TRUSTEE OF THE DENNIS J. LAFER LIVING TRUST, DATED 11/3/1994, AND VIRGINIA W. LAFER, AS TRUSTEE OF THE VIRGINIA W/ LAFER LIVING TRUST, DATES 11/3/1994 v. JOSEPH RAY LEATHERS a/k/a JOEY LEATHERS AND MARLENA LEATHERS, and UNKNOWN OCCUPANTS

and will continue harm litigants in Florida by engaging in unlicensed practice of law in Florida remotely from Oregon.

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

Michael Hurckes

Michael A. Hurckes, Esq.

Date: May 2, 2024

ANNEXURE-A

RE: Confirmation of E-Filing/Request for Motion for Continuance – Case No. 2023-CA-011483-XXXX-MA

1 message

Powell, Sandra <PowellS@coj.net>

Fri, Apr 26, 2024 at 11:34 AM

To: Sarah Gabr <sarahgabr@icloud.com>

Cc: Joseph Leathers <jleathers2009@gmail.com>, James Bledsoe <JAB@bledsoejacobson.com>, "Michael A. Hurckes (mh@mahadvising.com)" <mh@mahadvising.com>

Including opposing counsel.

Thank you!

Sandi Powell

Judicial Assistant to the
Honorable Katie L. Dearing
Duval County Courthouse
501 West Adams Street
Jacksonville, FL 32202
904-255-1246

From: Sarah Gabr <sarahgabr@icloud.com>

Sent: Friday, April 26, 2024 11:25 AM

To: Powell, Sandra <PowellS@coj.net>

Cc: Joseph Leathers <jleathers2009@gmail.com>

Subject: Confirmation of E-Filing/Request for Motion for Continuance – Case No. 2023-CA-011483-XXXX-MA

EXTERNAL EMAIL: This email originated from a non-COJ email address. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Sandi,

I hope this message finds you well. I am writing to follow up on our conversation yesterday regarding the motion for continuance I submitted on behalf of Mr. Joseph Leathers, and Ms. Marlena Leathers, whom are currently representing themselves, pro se. The motion has now been e-filed, and we hope it will be duly considered by the Honorable Judge Katie Dearing.

As mentioned in the motion and our discussion, we are in the process of filing a formal complaint against Mr. Leathers' previous attorney, Michael Hurckes, due to significant concerns about his ethical conduct and the impact of his actions on Mr. Leathers' case. We have detailed these issues in the motion, highlighting the challenges Mr. Leathers faces due to circumstances beyond his control that have necessitated this request for a continuance.

We would greatly appreciate the Court's understanding and consideration of Mr. Leathers' current situation. Please let me know if there is any additional information you require to facilitate the review of our motion.

Thank you for your time and attention to this matter. We look forward to your response and hope for a favorable consideration.

I have also attached the documents that have been e-filed to this email as well for your review. There are two copies, one with original signature, and one with e-signature.

Best regards,
Sarah Gabr - Paralegal
On behalf of Joseph and Marlena Leathers (cc'd)

Begin forwarded message:

From: <eservice@myflcourtagency.com>

Subject: SERVICE OF COURT DOCUMENT CASE NUMBER 162023CA011483XXXXMA LAFER AS TRUSTEE OF THE DENNIS J. LAFER LIVING TRUST, DATED 11/3/1994, DENNIS J. - LEATHERS, JOSEPH RAY

Date: April 26, 2024 at 6:01:07 PM GMT+3

Reply-To: <noreply@myflcourtagency.com>

Notice of Service of Court Documents

Filing Information

Filing #:

[197067744](#)

Filing Time:

04/26/2024 11:01:00 AM ET

Filer:

Sarah Gabr 971-285-4387

Court:

Fourth Judicial Circuit in and for Duval County, Florida

Case #:

162023CA011483XXXXMA

Court Case #:

16-2023-CA-011483-XXXX-MA

Case Style:

LAFER AS TRUSTEE OF THE DENNIS J. LAFER LIVING TRUST, DATED 11/3/1994, DENNIS J. - LEATHERS, JOSEPH RAY Emergency filing designation by the filer;

Documents

Click on the file name below to download or print your document NOW. The link expires in 14 days

Documents

Title	File
Motion For Continuance	Motion-for-Continuance_e-sign .pdf
Motion For Continuance	Motion_for_continuance_signed.pdf

E-service recipients selected for service:

Name	Email Address
Joseph Ray Leathers	jleathers2009@gmail.com
Marlena Leathers	Marlenaleathers0809@gmail.com
James A Bledsoe Jr	jab@bledsoejacobson.com
	tls@bledsoejacobson.com

Name	Email Address
	tls@bledsoejacobson.com
Sarah Gabr	sarahgabr@icloud.com
Sandi Powell	powells@coj.net

E-service recipients not selected for service:

Name	Email Address
ALEXANDER E BORELL	service@borell.com
	aborell69@gmail.com
Sandra Sosa	Ssosa@borell.com
Richard Beckish	RBeckish@borell.com
James Alexander Bledsoe, Jr	jab@bledsoejacobson.com
	tls@bledsoejacobson.com
	tls@bledsoejacobson.com
Alexander Edward Borell	service@borell.com
	aborell69@gmail.com
Michael Alexander Hurckes	mh@mahadvising.com
	legal@mahadvising.com
Timothy J. McDermott	tim@mcdermottmediation.com

This is an automatic email message generated by the Florida Courts E-Filing Portal. This email address does not receive email.

Document Access Link(s) will be active for 14 days (excluding weekends) after the Clerk accepts the submission or it is abandoned. In addition to access to the link for 14 days (excluding weekends), the documents will also be available, after acceptance by the Clerk, to counsel of record in the portal on the My Cases page, by clicking on the case number and then the document name, or by accessing the Clerk's website.

If you are not associated with this case and wish to be removed, please click [here](#) to request to be removed from the E-service list.

Thank you,
The Florida Courts E-Filing Portal

**DENNIS J. LAFER, AS TRUSTEE OF THE DENNIS
J. LAFER LIVING TRUST, DATED 11/3/1994, AND
VIRGINIA W. LAFTER, AS TRUSTEE OF THE VIRGINIA
W/LAFER LIVING TRUST, DATES 11/3/1994,**

Plaintiff(s)

VS

**JOSEPH RAY LEATHERS a/k/a JOEY LEATHERS
AND MARLENA LEATHERS, and UNKOWN OCCUPANTS,**

Defendant(s)

**IN THE COUNTY COURT, FOURTH
JUDICIAL CIRCUIT IN AND FOR
DUVAL COUNTY, FLORIDA**

**CASE NUMBER: 2023-CA-011483-XXXX-MA
DIVISION: CV-B**

DEFENDANTS MOTION FOR CONTINUANCE

COMES NOW, the Defendants, JOSEPH RAY LEATHERS and MARLENA LEATHERS, pro se, and hereby respectfully request this Honorable Court to grant a continuance of the hearing currently scheduled for May 6th, 2024, and in support thereof, states as follows:

1. The Defendants recently retained counsel, Michael Hurckes, Esq., to represent in the above-captioned matter.
2. Unfortunately, Mr. Hurckes did not file a notice of representation with the Court until three weeks after being retained, which has substantially impaired the Defendants' ability to prepare for the upcoming hearing.
3. Since the filing of the notice of representation, Mr. Hurckes has been unresponsive to communication attempts by the Defendants, failing to answer phone calls or provide substantive updates on the preparation for the hearing.
4. The Defendants have acted in good faith and have made every attempt to engage with their counsel to prepare a defense and respond to the Plaintiffs' claims.
5. Due to the lack of communication and adequate preparation by their counsel, the Defendants are prejudiced in their ability to properly defend themselves and participate in the upcoming hearing.
6. The Defendants are in the process of filing a complaint with the State Bar against Mr. Hurckes due to his lack of due diligence and communication.
7. In the interest of justice and to ensure fair proceedings, the Defendants now proceeding pro se, request that the hearing be continued to allow them adequate time to prepare their defense and properly present their case.
8. The Defendants also express their interest in proposing a settlement to the Plaintiffs and would like adequate time to prepare a fair and reasonable offer.

WHEREFORE, Defendants, JOSEPH RAY LEATHERS and MARLENA LEATHERS, respectfully request this Honorable Court to grant this motion for continuance and reschedule the hearing for a date at least 21 days from the date of the original hearing, the 6th day of May 2024, to allow the Defendants to adequately prepare for their case given the current circumstances that are out of their control.

Dated at Jacksonville, Duval County, Florida, this 25th day of April, 2024.

CERTIFICATE OF SERVICE

I hereby Certify that a true and correct copy of the above has been furnished by email, delivered via e-mail to the Judicial Assistant to the Honorable Judge Katie L. Daring (powells@coj.net).

Respectfully submitted by, Joseph Ray Leathers and Marlana Leathers, Address: 3140 Nain Rd Jacksonville, FL32207, Phone Number: 904-418-4276, Email: jleathers2009@gmail.com.

Joseph Leathers  *Marlena Leathers* 

Defendant(s) Signature

Joseph Leathers and Marlana Leathers

Defendant(s) Printed Name

3140 Nain Road

Defendant(s) Address

Jacksonville, FL32207

Defendant(s) City, State, Zip Code

904-418-4276

Defendant(s) Telephone Number

EXHIBIT B

Overview

Services

Reviews

Photos

About



Dire Wolves Legal Group (Owner)

a month ago

Thank you so much [REDACTED] for your review 😊 you have no idea how much it means to me to hear that, and I'm so glad I was able to help you out with your situation!



★★★★★ 4 weeks ago

Sarah is a lifesaver! After dealing with a fraudulent attorney, she got me to an attorney who's filed a class action suit to get my \$ 5,000 back for services I never received. I thought I was going to have to write this money off as a loss until she entered the picture. I strongly recommend her services!!!



★★★★★ a month ago

Dire Wolves Legal Group is a PHENOMENAL legal group that represents a wide range of legalities and are marked by a staff of professionalism, experience, kindness, respect and knowledge of the business inside and out. I strongly recommend ... [More](#)



Dire Wolves Legal Group (Owner)

a month ago

Thanks [REDACTED]

Overview

Services

Reviews

Photos

About

 a month ago

Thanks 



★★★★★ a month ago

Sarah is very sweet and professional at the same time. One thing is for sure she will always answer you all time, excellent customer service.



 Dire Wolves Legal Group (Owner)
a month ago


Thank you 



★★★★★ 3 weeks ago **NEW**

There is no other place I would put my trust when it comes to legal representation. If you have been searching for a reputable group, you have found them. Extremely responsive!



 Dire Wolves Legal Group (Owner)
a month ago

Thank you!!! 🙏😊



direwolveslegal.com
<https://www.direwolveslegal.com> > ...



Overview

Services

Reviews

Photos

About



Dire Wolves Legal Group (Owner)

a month ago

Thank you so much [redacted] for your review 😊 you have no idea how much it means to me to hear that, and I'm so glad I was able to help you out with your situation!



★★★★★ 4 weeks ago

Sarah is a lifesaver! After dealing with a fraudulent attorney, she got me to an attorney who's filed a class action suit to get my \$ 5,000 back for services I never received. I thought I was going to have to write this money off as a loss until she entered the picture. I strongly recommend her services!!!



★★★★★ a month ago

Dire Wolves Legal Group is a PHENOMENAL legal group that represents a wide range of legalities and are marked by a staff of professionalism, experience, kindness, respect and knowledge of the business inside and out. I strongly recommend ... [More](#)



Dire Wolves Legal Group (Owner)

a month ago



Overview

Services

Reviews

Photos

About



★★★★★ a month ago

Sarah has to be one of the most honest people I know! She has helped me tremendously; taking the time to understand what I'm fighting for and using every liberty to help. She is honest, kind, caring and very efficient at her job; paying ... [More](#)



Dire Wolves Legal Group (Owner)

a month ago

Thank you so much [redacted] for your review 😊 you have no idea how much it means to me to hear that, and I'm so glad I was able to help you out with your situation!



★★★★★ 4 weeks ago

Sarah is a lifesaver! After dealing with a fraudulent attorney, she got me to an attorney who's filed a class action suit to get my \$ 5,000 back for services I never received. I thought I was going to have to write this money off as a loss until she entered the picture. I strongly recommend her services!!!



Dire Wolves Legal Group is a PHENOMENAL legal group that represents a wide range of legalities and are marked by a staff of professionalism, experience, kindness, respect and

Overview

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Reviews

Photos

About

✓ Most relevant

Newest

Highest

Lowest



★★★★★ a month ago

Sarah is a great paralegal who cares about the outcome of her cases. Very knowledgeable person who offer great services and more than fair prices. She really helped me get the legal services I needed for my case when I had no idea where to go or how to handle my situation. I give five stars , highly recommended 👍



Dire Wolves Legal Group (Owner)

a month ago

Thanks so much [redacted]! I'm glad I was able to help, its a pleasure working with you :)



★★★★★ a month ago

I can say that it has honestly been a pleasure using Sarah's legal service. She is knowledgeable, intelligent and very attentive to the needs of her clients. I highly recommend her and would look forward to using her services again, should the need arise. She is trustworthy and a strong advocate for her clients!



EXHIBIT C

16:31

81



sarahgabr@icloud.com >

iMessage

Thu, May 30 at 12:31

Hi Chris, my name is Sarah, I used to work at MAH Law Firm (Attorney Michael Hurckes) as a Paralegal, and I'm reaching out to you because I'm currently helping clients who have had negative experiences with the firm, and I saw while I was there that you left a msg saying you hadn't spoken to anyone there in over 2 weeks, that msg was from April, which I believe because it happens all the time at that firm.

It had unfortunately come to my attention during my time there that the firm is engaging in unethical practices, including felon



iMessage



16:31

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sarahgabr@icloud.com >

engaging in unethical practices, including false advertising, scamming people out of loans with Affirm, and failing to work on clients' cases, affecting over 550 people, causing them serious loss financially, emotionally, and legally.

I would like to help you out if you haven't been receiving the service they promised you, I've already helped over 30 people. If you would like to learn more about what is going on feel free to give me a call on 971-285-4387 or text me back here, as I can't give out too much information before speaking to you directly.

If you don't want to be a



iMessage



16:31

📶 81



sarahgabr@icloud.com >

If you don't want to be a part of this I completely understand, all I ask is that you please keep this confidential for the time being, as MAH's involvement may cause harm to the people looking to get justice from them.

Wishing you the best.

Also, here is the link to the BBB Page, where you can see other clients complaints that have been verified by the BBB as valid, as they can't post any complaints without doing an investigation.

<https://www.bbb.org/us/fl/tampa/profile/legal-advice/mah-advising-llc-0653-90443591/>



iMessage



16:32

📶 📶 81



sarahgabr@icloud.com >

complaints (<https://www.bbb.org/us/fl/tampa/profile/legal-advice/mah-advising-pllc-0653-90443591/complaints>)

Sat, Jun 1 at 15:25

Attorney Name: Mark Guralnick

Tampa Office:
813-872-9000

When you call tell them Sarah Gabr referred you regarding legal malpractice case

Here is his YouTube channel and some related videos as well:

YouTube Channel: <https://www.youtube.com/@lawofficesofmarks.guralnick012/videos> (<https://>



iMessage



16:32

📶 81



sarahgabr@icloud.com >

nic918/videos (<https://www.youtube.com/@lawofficesofmarks.gural-nic918/videos>)

Is it Legal Malpractice if Lawyer fails to show up to case?: <https://www.youtube.com/watch?v=FSH6tABZAx8> (<https://www.youtube.com/watch?v=FSH6tABZAx8>)

How can you tell if your lawyer committed legal malpractice: https://www.youtube.com/watch?v=YuqxFql_K_Q (https://www.youtube.com/watch?v=YuqxFql_K_Q)

Is it legal malpractice if my lawyer steals my money? <https://www.youtube.com/watch?v=dDG64fhGpLA> (<https://www.youtube.com/>



iMessage



16:32

📶 81



sarahgabr@icloud.com >

Is it legal malpractice if my lawyer lies about his credentials?:

<https://www.youtube.com/watch?v=YLtpRgOIWsl>
(<https://www.youtube.com/watch?v=YLtpRgOIWsl>)

Is it legal malpractice if my lawyer doesn't return my phone calls?:

<https://www.youtube.com/watch?v=322kFTVZ1Bc>
(<https://www.youtube.com/watch?v=322kFTVZ1Bc>)

Facebook:

<https://www.facebook.com/lawofficeofmsg/> (<https://www.facebook.com/lawofficeofmsg/>)

The sender is not in your contact list.

[Report Junk](#)



iMessage



16:32

📶 81



sarahgabr@icloud.com >

(<https://www.youtube.com/watch?v=dDG64fhGpLA>)

About Mark Guralnick (Divorce): <https://www.youtube.com/watch?v=gq5nERGNV2I> (<https://www.youtube.com/watch?v=gq5nERGNV2I>)

Is it legal malpractice if my lawyer lies about his credentials?: <https://www.youtube.com/watch?v=YLtpRgOIWsl> (<https://www.youtube.com/watch?v=YLtpRgOIWsl>)

Is it legal malpractice if my lawyer doesn't return my phone calls?: <https://www.youtube.com/watch?v=322kFTVZ1Bc> (<https://www.youtube.com/watch?v=322kFTVZ1Bc>)



iMessage



EXHIBIT D

16:32

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sarahgabr@icloud.com >

complaints (<https://www.bbb.org/us/fl/tampa/profile/legal-advice/mah-advising-llc-0653-90443591/complaints>)

Sat, Jun 1 at 15:25

Attorney Name: Mark Guralnick

**Tampa Office:
813-872-9000
When you call tell them
Sarah Gabr referred you
regarding legal malpractice
case**

**Here is his YouTube
channel and some related
videos as well:
YouTube Channel: <https://www.youtube.com/@lawofficesofmarks.guralnick012/videos> (<https://www.youtube.com/@lawofficesofmarks.guralnick012/videos>)**

+ iMessage



EXHIBIT E



[Redacted name]

2 reviews



★★★★★ 4 weeks ago

Sarah is a lifesaver! After dealing with a fraudulent attorney, she got me to an attorney who's filed a class action suit to get my \$ 5,000 back for services I never received. I thought I was going to have to write this money off as a loss until she entered the picture. I strongly recommend her services!!!



EXHIBIT F

OPTIONS

- Home
- Complaints
- Reviews
- Help

Logout

BBB Customer Review for MAH Advising PLLC by David J. (rockefellerm2@gmail.com from zip/postal code: 90210) on 7/18/2024



DO NOT RETAIN. RUN away. If I could give 0 stars, I would! My relative has had ongoing issues with this "legal practice" since the beginning! The guy Michael who she spoke with who apparently runs this firm is the epitome of slime. He's about 28 years of age and knows absolutely nothing! Ran his background with the FL bar... his supposed law license dates only to 2022. But he talks a good game. A loan was taken out for my aunt in the amount of \$7,500, without her knowledge and consent, and no one ever called her for weeks and months to confirm any information with her. Michael and his staff call you 2-3 times to get your money then go missing when they receive your money. No one calls, send messages... can't speak with Michael... unable to leave voicemail... nothing. The FBI should look into this matter ASAP. Committed fraud against an elder.

To,

Better Business Bureau,

We at MAH Advising PLLC categorically deny the baseless and defamatory statements made by David J in the review dated 07/18/2024. It is crucial to note that David J has never been a client of our firm, nor has he had any direct dealings with us. Our firm maintains meticulous client records, and there is no evidence of any engagement or service provided to him.

The accusations made, including claims of unauthorized loans, lack of communication, and allegations of fraud, are completely unfounded and defamatory. Michael A. Hurckes, Esq., who is the principal of the firm, is a licensed attorney in good standing with the Florida Bar. The assertions questioning his credentials and professional conduct are entirely false and without merit.

We strongly urge the Better Business Bureau to exercise due diligence and not permit reviews from individuals who have not had a first-hand experience with the business in question. Allowing such unfounded allegations harms the reputation of legitimate businesses and undermines the integrity of the BBB review system.

We request that this review be removed promptly to prevent further dissemination of false information.

Sincerely,
Michael A. Hurckes, Esq.
MAH Advising PLLC
3030 N Rocky Point Dr East, Suite 200
Tampa, FL 33607
(917) 791-0636
mh@mahadvising.com

Michael A. Hurckes, Esq. on 07/26/2024

This REVIEW has been published and currently appears on the BBB Business Profile on bbb.org.

Share this link to promote your BBB Customer Reviews:

<https://www.bbb.org/west-florida/review/90443591/>

Comment on this Review

Your Response/Comment...

Your Name:

Your Email:

Submit my Response to BBB

Your comment will be published on bbb.org alongside the review on your BBB Business Profile. BBB staff will redact/remove any personally identifiable information or inappropriate language.

Please contact BBB if you believe you did not have an interaction with this consumer. (Interactions don't require a transaction to have taken place.)

Otherwise, BBB assumes that there was an interaction and that the submission of this customer review was not incentivized by you.

EXHIBIT G

MAH ADVISING LLC
ATTORNEYS AT LAW

Office of MAH Advising PLLC <office@mahadvising.com>

Re: MAH Advising PLLC (90443591)

Michael Hurckes <mh@mahadvising.com>

Mon, Jul 29, 2024 at 11:01 AM

To: John Zajac <jzajac@bbbwestflorida.org>, Office of MAH Advising PLLC <office@mahadvising.com>

John,

Can you let me know what entity BBB West Florida is relating to? Otherwise, we're just going to sue all of them. Also, would you like to waive service or do you want us to formally serve your registered agent?

I always just prefer to have a copy of the complaint emailed to me. Looks like some of the reviewers are requesting that these reviews are removed, please ensure that is done quickly.

Our plan is that each review/ client, and Sarah Gobb and BBB is going to be a separate action. I think joining all reviews in one will be improper. So 17+ suits to be filed. Again, we're suing them no matter what the question is BBB going to be named in it. As you are aware you have 5 days from when we sent the demand letter to take these down. Otherwise, the law gives me the greenlight to bulldoze everyone in my way.

Michael Hurckes

Managing Attorney

Phone: (917) 410-1182

Email: mh@mahadvising.com

<https://mahadvising.com>

This email, including any attachments, is confidential and intended for the recipient specified in the message only. It is strictly forbidden to share any part of this message with any third party, without the written consent of the sender. If you received this message by mistake, please reply to this message to inform the sender, and follow with its deletion.

On Wed, Jul 24, 2024 at 1:36 PM John Zajac <jzajac@bbbwestflorida.org> wrote:

Michael,

We want to connect with you following our call last month.

During our conversation, we asked if MAH would share what information they could related to the former employee who breached MAH's database and stole a list of customers. Are you able to provide any additional information for our review?

MAH also indicated that they did not believe they had marketplace interaction with a number of people who posted complaints or negative customer reviews. Were you able to identify any of those?

Also, BBB has been informed by consumers that MAH is threatening to sue them if they do not remove their complaints or reviews. We would like to understand from you what has been happening involving your dealings with consumers.

Thank you,

John Zajac

Corporate Counsel

Better Business Bureau®

p: 727-479-1283

f: 727-539-6301

BBB.org

Serving West Florida

2655 McCormick Dr, Clearwater, FL 33759



**THE SIGN OF A
BETTER
BUSINESS**
BBB.org





Michael Hurckes <mh@mahadvising.com>

MAH Advising PLLC (90443591)

John Zajac <jzajac@bbbwestflorida.org>
 To: todd@thereputationmd.com, sgarces@mahadvising.com, mh@mahadvising.com
 Cc: Karen Nalven <knalven@bbbwestflorida.org>

Tue, Jun 18, 2024 at 1:31 PM

Todd and Michael,

Thank you for connecting with us.

We are happy to discuss everything that is transpiring at MAH Advising and help you with the resolution of your customers' complaints.

Please feel free to call me at your earliest opportunity.

Thank you!

John Zajac

Corporate Counsel

Better Business Bureau®

p: 727-479-1283

f: 727-539-6301

BBB.org

Serving West Florida

2655 McCormick Dr, Clearwater, FL 33759



----- Forwarded message -----

From: **Michael Hurckes** <mh@mahadvising.com>
 Date: Mon, Jun 17, 2024 at 4:40 PM
 Subject: Re: Recent "Unresolved" Closed out Complaints - MAH Advising
 To: Todd Lewis <todd@thereputationmd.com>
 Cc: Sophia Garces <sgarces@mahadvising.com>, Todd Eikenberry <teikenberry@bbbwestflorida.org>

Hi Mr. Eikenberry,

Please allow me to introduce myself. My name is Michael Hurckes I'm the managing Attorney of MAH Advising. The these negative reviews were brought on by an ex employee Sarah Gobb, who left and tried to practice law without a license and steal our clients. These negative reviews were an effort lead by her and do not reflect our client experience.

We are currently in touch with the investigative Agents of the FBI pursuing Ms. Gobb, as well as the Florida bar who will be prosecuting her.

In addition to that we have a civil suit coming against her too. By ABA and Bar rules we are not allowed to materially disclose client information to the BBB, the only way around this is to have a third party Todd here reach out and escalate this to our team internally.

We would prefer not to bring the BBB and yourself into these criminal and civil actions to get these defamatory, and false accusations off your website. Our consultant is attempting to work through these Diligently, however our next step is going to have to be adding you to the litigation in all honesty.

We'd much rather prefer to keep our relationship cordial and respectful. In addition, we would also accept complete removal of our business from the BBB.

Let us know,

Michael Hurckes, Esq

On Mon, Jun 17, 2024 at 10:14AM Todd Lewis <todd@thereputationmd.com> wrote:

Hey Todd,

I hope you are well,

I never heard back from you regarding MAH Advising so I am not sure if you received my emails. Nor am I sure if you received emails from both Michael and Sophia of MAH Advising (CC'd on this email). authorizing me to work on their account. Nonetheless, I have been working with MAH to try to be a better business and pay a heck of a lot more attention to the MAH's BBB pages.

Firstly, let's call out the elephant in the room. MAH has done an awful job when it comes to their BBB page and replying to complaints. Previous to hiring me, I don't believe that they responded to a single complaint. With that, and before they knew it, they quickly had an "F." They did not give the page the attention it deserved, but that has changed. They have to come to me to try to make things right. So please understand, while we understand the BBB may be "Licking their wounds" a bit when it comes to MAH, we need the BBB to understand that MAH intends to do all it can to make things right.

That brings me to my plan for improvement with MAH. As I stated in my email to you two weeks ago, my goal is to get MAH to a place where they can be proud of their page. The first order of business is to address all unresolved or unanswered complaints and that is what we have been doing. All 16 complaints have been reopened. This brings me to my first issue. As you know, in order to reopen a complaint, the company must respond to all

unanswered or unresolved complaints with a stance statement. When these complaints were reopened, MAH simply stated "We take consumer concerns very seriously. we will reach out to the consumer to try to resolve this issue ASAP." At that point, all consumers who made complaints were reached out to.

Now this brings me to one of the biggest flaws in the BBB response system. As you know, now that we responded and reopened the complaint, the consumer who made the complaint is going to get an email asking if they are "Satisfied" with the resolution. Well of course they are not. The consumer hasn't even spoken to the company yet. And this email unfortunately only makes the consumer more angry and resentful. So much so that many consumers refuse to even talk to the business. Such is the case with complaint # 21736050 "Katelyn Curran." This consumer complaint was closed out as "Unresolved." This consumer not only confirms that they did receive our correspondence to resolve this issue, but also officially states that they have no desire to work this out or to respond. And because of this, the BBB has chosen to mark the complaint "Unresolved" which now negatively reflects against MAH and makes it impossible for them to get a better grade. I don't understand how the BBB can take this stance. As unbiased mediators, you are rewarding the consumer and basically telling the company that the only way that the BBB is going to be unbiased is if you refund the consumer in full and that's it. How is this possible? If MAH is actively trying to resolve the issue, and the consumer refuses to try to resolve it, why would MAH be penalized by this? Should this complaint not be marked as "Answered?" This complaint has been closed out with no opportunity for it to be reopened. MAH requests that the complaint be reopened or the complaint be marked as "Answered."

There is a second case that also has been closed out as "Unresolved." Theresa Quirion, complaint # 21701155 has taken the same all or nothing stance. Via me, MAH has actively been trying to resolve things with this consumer. In fact, MAH has offered a substantial refund that has been refused by the consumer. Additionally, the BBB has closed this complaint as "Unresolved" with no ability to reopen it. This consumer too is saying she wants all of her money back or nothing. I can't assume that the BBB is supporting this stance and perhaps closing it out was an oversight. But just because a consumer doesn't like an offer, doesn't mean the company didn't make diligent efforts to try to resolve the issue. But closing the complaint out, and not allowing the company to try to resolve the issue, you are knowingly supporting and assisting the consumer in strong arming the company by using your platform as leverage to do so. This is not helping the business to become better and goes against everything the BBB stands for. Can this case be marked as "Answered" or at least can we reopen it?

In conclusion, I need your help Todd. I know that the BBB doesn't love me for a myriad of reasons but the bottom line is, I help businesses be better. I address consumer concerns and help turn companies around in regards to their BBB pages. I ask that you please do your best to not judge MAH on their past BBB interactions, (or lack thereof), and give them a shot to try to work with these consumers. I ask that you give them the same respect that you would to a company that already has an A. Please apply the same logic, reasoning, and decision making that you would if the company was in your good graces. MAH will get better. we just need the opportunity to do so.

Thanks

Todd Lewis

CEO

The Reputation MD

Direct: (818) 256-3840

Fax: (818) 533-6221
Email: Todd@thereputationmd.com
Website: www.thereputationmd.com

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Sincerely,

Todd Eikenberry
Director, Business Development
Better Business Bureau®
Office 727-479-1281
Fax 727-539-6301

BBB.org

Serving West Florida
2655 McCormick Dr, Clearwater, FL 33759



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MAH ADVISING LLC
ATTORNEYS AT LAW

Michael Hurckes <mh@mahadvising.com>

MAH Advising PLLC (90443591)

Michael Hurckes <mh@mahadvising.com>

Tue, Jun 18, 2024 at 2:03 PM

To: John Zajac <jzajac@bbbwestflorida.org>

Cc: Todd Lewis <todd@thereputationmd.com>, sgarces@mahadvising.com, Karen Nalven <knalven@bbbwestflorida.org>

Hi John,

What do you have in the beginning of the day tomorrow? I'll catch you up on the ULPL FBI and Floirda Bar investigation I'll try to find the complaint in the mean time made to both. The easiest path forward I believe would be the removal of the BBB page in the entirety. We can't materially respond to these complaints given attorney client privilege I do not believe BBB is the appropriate forum for this and needs to be referred to the Bar. Absent removal BBB is most likely ending up in federal court with Ms. Gobb.

Let us know your thoughts. We'd agree to a mutual release if BBB removes our page.

Michael Hurckes

Managing Attorney

Phone: (917) 410-1182

Email: mh@mahadvising.com



<https://mahadvising.com>

This email, including any attachments, is confidential and intended for the recipient specified in the message only. It is strictly forbidden to share any part of this message with any third party, without the written consent of the sender. If you received this message by mistake, please reply to this message to inform the sender, and follow with its deletion.

[Quoted text hidden]

▲ CURRENT ALERTS FOR THIS BUSINESS**Alert:**

BBB files indicate that this business has a pattern of complaints concerning customers alleging that the business did not contact them or work on their cases after they paid a retainer. Some customers alleged that the business opened loans without their approval. Complaints also alleged issues with receiving refunds. On May 30, 2024, BBB submitted a written request to the company encouraging them to address the pattern of complaints.

The business has responded to BBB, indicating that the complaints result from an ex-employee that wrongfully contacted customers encouraging them to file complaints. Additionally, the business indicated that retainers that customers paid for services are nonrefundable.

The business indicated that complaints and/or customer reviews that were submitted to BBB were posted from people that were not customers of the business. BBB requested that the business identify which people were not customers, however the business has not identified anyone.

[Read less](#)**Alert:**

It has come to BBB's attention that the business is allegedly requesting that customers withdraw the text of complaints or customer reviews posted on the BBB website, or it will file lawsuits against the customers. Consent to post the text of a complaint or customer review is solely at the discretion of the customer. The business may only choose whether to have its response to the complaint posted or not.

[Read less](#)[Contact Information](#)[Customer Reviews](#)[BBB Rating & Accreditation](#)

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Customer Reviews

 3.91/5

Average of 33 Customer Reviews

[Read Reviews](#)[Start a Review](#)**Customer Complaints**

26 complaints closed in last 3 years

26 complaints closed in last 12 months

[Read Complaints](#)[File a Complaint](#)**BBB Rating & Accreditation****F****THIS BUSINESS IS NOT BBB ACCREDITED**[Search for Accredited
Businesses in this category](#)**Customer Reviews are not used in the
calculation of BBB Rating**[Reasons for BBB Rating](#)

EXHIBIT H



July 26, 2024

Registered Agent
Better Business Bureau of Northwest Florida, Inc.
Christine Mathis
912 East Gadsden St,
Pensacola, FL 32501

Via Certified Mail

DEMAND TO CEASE & DESIST

Re: MAH Advising PLLC, Better Business Bureau False and Fraudulent Complaints

To Ms. Mathis,

We write to formally demand that Better Business Bureau (the “BBB”) immediately cease & desist from publishing in its website negative consumer reviews consisting of false, fraudulent, disparaging, and defamatory remarks against MAH Advising PLLC.

MAH Advising PLLC (the “Law Firm”) is a law firm with office addresses at 3030 N. Rocky Point Drive W., #150 Tampa, FL 33607 and in One World Trade Center, Fulton St #8500, New York, NY. Law Firm has an established law practice with most of its clients being based out of Florida.

BBB has published Law Firm’s business profile and, along with it, seventeen (17) complaints against Law Firm made by anonymous profiles claiming to be its customers. Pursuant to BBB’s own unpublished and uncommunicated criteria, BBB has also published an “F” rating against Law Firm.

At on or about June 17, 2024, Law Firm informed BBB by e-mail that the negative reviews it published on its website were not made by actual customers, and that said reviews were part of an ongoing effort by a former resentful employee to extort money from Law Firm. Law Firm further informed BBB that the former employee is currently the subject of an FBI and Florida Bar investigation relating to the former employee’s unauthorized practice of law. Accordingly, Law Firm requested the removal of its business profile from BBB’s website because it allowed negative

❖ 3001 N. Rocky Point Drive E., #200
Tampa, FL 33607

❖ One World Trade Center, Fulton St
#8500, New York, NY

❖ (813) 861-2132

❖ info@mahadvising.com



consumer reviews consisting of false, fraudulent, disparaging, and defamatory remarks against Law Firm.

Despite several correspondence between Law Firm and BBB's representative you have failed to process the removal of Law Firm's business profile in BBB's website. Likewise, BBB has failed to remove the negative consumer reviews consisting of defamatory remarks against Law Firm despite full knowledge that these reviews were made by Law Firm's former employee and not actual customers or individuals who transacted with Law Firm.

BBB's publication of the patently false complaints against Law Firm may be considered defamatory because such publication despite knowledge of its falsity constitutes reckless disregard of truth. *See Patio World v. Better Bus. Bureau, Inc.*, 43 Ohio App. 3d 6, 11 (1989) Denying motion for summary judgment stating that a jury could conclude "the BBB employees' statements that the plaintiff did not resolve its customer complaints were false and were published with reckless disregard as to the truth of the statements made to members of the public." BBB's publication of patently false and concocted negative reviews – which it knows were not made by Law Firm's actual customers but of an employee attempting extortion – may be considered defamatory for BBB's reckless disregard of the truth. *See also, Kimball v. Better Business Bureau of West Florida*, 613 Fed. Appx. 821, 825 (11th Cir. 2015) (holding that plaintiff alleged cause of action for libel and defamation against BBB organization for F rating)

BBB's publication of the false complaints may also constitute unfair or deceptive acts or practices under Florida's Deceptive and Unfair Trade Practices Act ("FDUTPA") Fla. Stat. § 501.204(1). *See Caribbean Cruise Line, Inc. v. Better Bus. Bureau of Palm Beach Cnty., Inc.*, 169 So. 3d 164, 167 (Fla. 4th DCA 2015) (reversing the trial court's dismissal of a FDUTPA claim because the plaintiff had alleged, among other things, that the BBB had made false statements about how it rated companies because such allegations were not "disputes with opinions issued by [the] BBB") *See also Home Performance All. v. Better Bus. Bureau of W. Fla.*, 354 So. 3d 1165, 1167 (Fla. 2d DCA 2023) (reversing trial court's dismissal of the FDUTPA claim and allowing amendment of complaint)

Based on the foregoing, consider this letter as our formal and final demand for you to cease & desist from publishing Law Firm's business profile on BBB's website and from publishing the negative consumer reviews consisting of defamatory remarks against Law Firm within five (5) days from receipt of this letter.

Your failure to heed our demand shall constrain us to file the necessary case against you to protect our interests. Causes of action to be filed against BBB may include but not be limited to, defamation and violation of the Florida Deceptive and Unfair Trade Practices Act ("FDUTPA"). Damages to be prayed for in this case may include but not be limited to, compensatory damages, moral damages, and attorney's fees, among others.

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Tampa, FL 33607

❖ One World Trade Center, Fulton St
#8500, New York, NY

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❖ info@mahadvising.com



Should you wish to resolve this matter amicably please reach out to the undersigned directly at (917) 791-0636 or via email at mh@mahadvising.com.

Sincerely,

/s/ Michael A. Hurckes

Michael A. Hurckes, Esq.

MAH ADVISING PLLC,

Florida Bar No. 1040918

3001 N Rocky Point Dr East,

Suite 200

Tampa, FL 33607

(917) 791-0636

mh@mahadvising.com

❖ 3001 N. Rocky Point Drive E., #200
Tampa, FL 33607

❖ (813) 861-2132

❖ One World Trade Center, Fulton St
#8500, New York, NY

❖ info@mahadvising.com



July 25, 2024

DEMAND TO CEASE & DESIST

Re: MAH Advising PLLC, Better Business Bureau False and Fraudulent Complaints

John Zajac
Corporate Counsel
Better Business Bureau
2655 McCormick Dr,
Clearwater, FL 33759

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Based on the foregoing, consider this letter as our formal and final demand for you to cease & desist from publishing Law Firm's business profile on BBB's website and from publishing the negative consumer reviews consisting of defamatory remarks against Law Firm within five (5) days from receipt of this letter pursuant to FL Statue § 770.01.

Your failure to heed our demand shall constrain us to file the necessary case against you to protect our interests. Causes of action to be filed against BBB may include but not be limited to, defamation and violation of the Florida Deceptive and Unfair Trade Practices Act ("FDUTPA"). Damages to be prayed for in this case may include but not be limited to, compensatory damages, moral damages, and attorney's fees, among others.

Should you wish to resolve this matter amicably please reach out to the undersigned directly at (917) 791-0636 or via email at mh@mahadvising.com.

Sincerely,

/s/ Michael A. Hurckes
Michael A. Hurckes, Esq.

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Tampa, FL 33607

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#8500, New York, NY

❖ info@mahadvising.com



MAH ADVISING PLLC,
Florida Bar No. 1040918
3001 N Rocky Point Dr East,
Suite 200
Tampa, FL 33607
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