

IN THE SUPREME COURT OF FLORIDA
THE FLORIDA BAR,
Supreme Court Case

Complainant,
The Florida Bar
v.

No. SC-
File Nos.
2019-70,393 (11D), 2019-70,4
(11D), 2019-70,494 (11D)
2019-70,590 (11D)

CHRIS R. BORGIA,
Respondent.

_____ /

ANSWER TO COMPLAINT

1. Admit.
- 2.
3. Admit.
- 4.
5. Neither admit nor deny.
- 6.
7. Admit client was charged a non-refundable costs deposit of 299.00 per the executed costs agreement.
8. Admit I met with the client, her father and her step-father approximately two weeks before the hearing. Deny that I recommended that the family and/or the client obtain numerous medical records and reports to present at the hearing.
9. Neither admit or deny.
10. Admit all allegations but deny that I failed to contact the Judges office prior to the hearing.
11. Admit the client terminated Respondent prior to the expiration of any appeal deadlines.

12. Neither admit nor deny.

13. Neither admit nor deny.

14. Admit the non refundable costs were not placed in a trust account as it was not necessary. Deny the allegation that the funds were not used to obtain any and all necessary medical records required to prosecute the disability claim for the client.

15. Neither admit nor deny

16. Admit the client retained the Respondent and executed the standard fee agreement for legal services pursuant to the rules regarding fee agreement under the Social Security guidelines. Neither admit nor deny the remaining allegations.

17. Admit

18. Deny.

19. Neither admit nor deny.

20. Deny.

21. Admit

22. Neither admit nor deny.

23. Neither admit nor deny.

24. Admit.

25. Deny.

26. Deny.

27. Deny.

28. Admit.

29. Admit.

30. Neither admit nor deny.

31. Admit.

32. Deny.

33. Deny.

34. Neither admit nor deny.

35. Admit.

36. Admit the non refundable costs were not placed in a trust account as it was not necessary. Deny the allegation that the funds were not used to obtain any and all necessary medical records required to prosecute the disability claim for the client.
37. Neither admit nor deny.

/s/ Chris R. Borgia, Esq.
Fla Bar No. 620
4000 Ponce de Leon Blvd.
Suite 470
Coral Gables, FL 33146
305-562-7333
786-350-3622
Crborgia@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that this document has been efiled with The Honorable John A. Tomasino, Clerk of the Supreme Court of Florida, with a copy provided via email to Jennifer R. Falcone, Bar Counsel, at jfalcone@flabar.org on this 8th day of December, 2020.

/s/ Chris R. Borgia, Esq.