

IN THE SUPREME COURT OF FLORIDA  
(Before a Referee)

THE FLORIDA BAR,

Complainant,

v.

TROY DONAHUE HARRIS,

Respondent.

---

Supreme Court Case No.

SC19-1894

The Florida Bar File No.

2018-70,484 (11B)

**RESPONDENT’S ANSWER TO THE FLORIDA BAR’S COMPLAINT**

COMES NOW, the Respondent, Troy Donahue Harris, by and through undersigned counsel, and files this Answer to the Florida Bar’s Complaint in the above styled matter and states the following:

1. Respondent admits the statements in paragraphs 1, 2, 3, 5, 7, 9, 15, 16, 19, 20, 25, and 26.
2. Respondent admits paragraph 4 to the extent that it tracks the language in an immigration affidavit intended to assist Mr. Chukwudi Nwankwo in his Motion to Reopen Proceedings. Respondent further asserts that the use of the term “specifically” was not intended to be limiting or exclude other filings on behalf of the client.

3. Respondent admits paragraph 6 to the extent that it tracks the language in an immigration affidavit intended to assist Mr. Chukwudi Nwankwo in his Motion to Reopen Proceedings. Respondent further asserts that the Client, Mr. Chukwudi Nwankwo was made aware that he was technically not eligible for the I-485, but the Client insisted that the application be filed, and willingly and knowingly paid the associated fees.

4. Respondent denies paragraph 8 as written, and demands strict proof thereof. Notwithstanding this denial, Respondent asserts that the Client was fully aware of the potential outcome(s) from the filing of the I-485 application.

5. Respondent denies paragraph 10, and demands strict proof thereof.

6. Respondent denies paragraph 11 as written, and demands strict proof thereof.

7. Respondent admits that he filed a second I-130 petition for Mr. Nwankwo (receipt number WAC-10-069-14404) at the behest of Ms. Ekeya, but denies the remainder of paragraph 12 as written, and demands strict proof thereof.

8. Respondent denies paragraphs 13, 14, 17, 18, 21, 22, and 23; and demands strict proof thereof.

9. Respondent admits paragraph 24 to the extent that he executed an affidavit intended to assist Mr. Chukwudi Nwankwo in his Motion to Reopen

Proceedings. To the extent a denial is required, Respondent denies the remainder of paragraph 24, and demands strict proof thereof.

10. Respondent denies the allegations in paragraph 27, and demands strict proof thereof.

Wherefore, Respondent respectfully requests that the Referee consider all of the facts and circumstances in this matter, including mitigating factors, and determine the appropriate discipline, if any, in accordance with the Rules Regulating the Florida Bar.

Respectfully Submitted,

By: /s/ Calrie Marsh  
Calrie Marsh, Esq.  
Florida Bar No. 21097  
**CALRIE MARSH, P.A.**  
*Attorney for Respondent*  
701 Brickell Avenue, Ste. 1550  
Miami, Florida 33131  
Tel. (305) 728-5319  
Fax. (305) 728-5288  
c.marsh@calriemarsh.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the original of this Answer to the Florida Bar's Complaint has been furnished by First Class Mail to the **Honorable Yery Marrero**, Referee, Miami-Dade Children's Courthouse, 155 N.W. 3<sup>rd</sup> Street, Room 14337, Miami, FL 33128 and via email at **maalfonso@jud11.flcourts.org**; a copy has been furnished to Keri T. Joseph, Bar Counsel, via email only at **kjoseph@floridabar.org**; and to Patricia Ann Toro Savitz, Staff Counsel, via email only at **psavitz@floridabar.org**, this **28th** day of December, 2019.

/s/ Calrie Marsh  
Calrie Marsh, Esq.  
Florida Bar #: 21097