

MEDIATOR QUALIFICATIONS BOARD

Northern Division

In Re: Keith Allen Manson

Case Number: QCC2013-057

Panel: The Honorable Ronald W. Flury

Bonnie Marmor

Carlotta Mitchell

Stephanie Murphy

Eugene Walker

**ORDER ACCEPTING ADMISSION TO FORMAL CHARGES AND IMPOSITION OF
SANCTIONS**

The Mediator Qualifications Board (MQB), Northern Division, by its duly designated five-member panel, met by conference call on October 14, 2014, discussed and considered the Admission and Stipulation, attached hereto and incorporated herein by reference, and finds the sanctions set forth in the agreement are appropriate. Therefore, the panel enters its ORDER in this matter pursuant to Fla. R. Certified and Court Appointed Mediators 10.820(b), as follows:

1. Upon concurrence of all five members of the panel, the Board accepts the respondents admission to the charges set forth in the Formal Charging document and imposes the sanctions set forth in the agreement as follows,
 - a) The Respondent/Applicant's application to be certified as a mediator by the Florida Dispute Resolution Center (DRC) is DENIED.
 - b) The Respondent/Applicant is forever barred and estopped from ever applying to be a certified mediator in the State of Florida, by and through the Dispute Resolution

Center, or its successors, under any certification areas. Should the Respondent/Applicant ever apply again, the application will be summarily denied and the matter will be returned to a reconstituted Panel of the Mediator Qualifications Board (MQB) or its successor boards, if any, for further disciplinary action. To this end, the MQB retains jurisdiction to enforce a breach of this ORDER, should any occur.

3. The Florida DRC shall comply with all provisions of Fla. R. Certified and Court Appointed Mediators 10.830 and shall follow all current internal DRC procedures with regard to notice and publication of imposed sanctions.

SO ORDERED.

Dated this the 20th day of OCTOBER, 2014.



Hon. Judge Ronald W. Flury, Hearing Panel Chair

2nd Judicial Circuit of Florida

301 South Monroe Street

Tallahassee, FL 32301

Copies by United States Mail to:

Respondent

Keith Allen Manson

[REDACTED]

In Re Keith Allen Manson QCC2013-057

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Order Accepting Admission to Formal Charges and Imposition of Sanctions



Florida Dispute Resolution Center

Director Janice Fleischer

500 South Duval Street

Tallahassee, FL 32399

MEDIATOR QUALIFICATIONS BOARD

In Re: Keith Alan Manson

Case No.: QCC2013-057

ADMISSION AND STIPULATION

WHEREAS, the Qualifications Complaint Committee of the Mediator Qualifications Board has found probable cause and brought formal charges against the above-referenced Applicant alleging violations of Rules 10.110, 10.110(c)(4)(A, C, D, E, F, G, H, I, J and K) and 10.110(d) of the Florida Rules for Certified and Court-Appointed Mediators; and

WHEREAS, a hearing on the formal charges against the Applicant has not yet been scheduled, and

WHEREAS, the Applicant wishes to admit to the formal charges, waive the right to a hearing and agree to the imposition of sanctions without the necessity of a hearing;

NOW, THEREFORE, the parties agree as follows:

1. The Applicant admits to all of the allegations set forth in the Formal Charges and the exhibits attached thereto, filed and fully incorporated herein by reference and attached hereto as Admission and Stipulation Exhibit A.
2. The Applicant accepts the imposition of the following Sanctions:
 - a) The Applicant's application to be certified as a mediator by the Dispute Resolution Center is DENIED.
 - b) The Applicant is forever barred and estopped from ever applying to be a certified mediator in the State of Florida, by and through the Dispute Resolution Center, or its successors, under any certification areas. Should the Applicant ever apply again, the application will be summarily denied and the provisions of Paragraph 3 will be applicable.
3. Any default of this agreement by the Applicant will result in this matter returning to an assigned Hearing Panel for further disciplinary action. The Applicant understands and agrees that jurisdiction is reserved to ensure the compliance by the applicant to the admission and sanctions set forth in this document.
4. Upon the acceptance of this Admission and Stipulation by the assigned Hearing Panel, the Applicant waives all rights to a Final Hearing; to seek review under the Florida Rules for Certified and Court-Appointed Mediators; or to otherwise challenge or contest the validity of this Admission and Stipulation and/or any final order to be entered by the

Hearing Panel. The applicant waives these rights knowingly and voluntarily and understanding the waiver is complete and binding.

5. If requested, the Applicant authorizes the Hearing Panel and/or MQB to review and examine all investigative file materials concerning the Mediator in connection with the consideration of this Admission and Stipulation. The Applicant agrees that consideration of this Admission and Stipulation and other related materials by the Hearing Panel and/or the MQB shall not prejudice or preclude the Hearing Panel, the MQB, or any of their members from further participation, consideration, or resolution of this proceeding if the terms and conditions of this Admission and Stipulation are not deemed acceptable by the Hearing Panel. Furthermore, the Applicant understands that the final ORDER in this cause will be entered by the Hearing Panel and/or MQB and that ORDER is binding on the parties. The Applicant understands the DRC shall follow all of its normal practices and procedures regarding disclosure of an Admission and Sanction and corresponding ORDER from the Hearing Panel and/or MQB and shall abide by any and all ORDER by the Hearing Panel and/or MQB.


Keith Alan Manson

STATE OF FLORIDA)
COUNTY OF Duval)

Before me, personally appeared Keith Alan Manson whose identity is known to me by the production of the following identification FLDL exp 10/26/22 and who, under oath, sworn and subscribed, acknowledges that he executed this document freely, knowingly and voluntarily and for the purposes herein expressed.

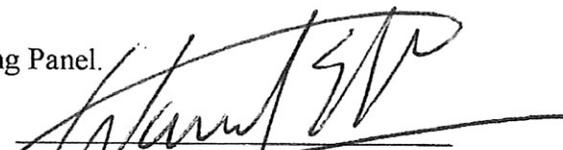
Sworn and subscribed before me this the 4th day of October, 2014.

[SEAL]




NOTARY PUBLIC

Agreed, pending approval of the Hearing Panel.


Warren Eth, Esq.
Prosecutor

MEDIATOR QUALIFICATIONS BOARD

Qualifications Complaint Committee

In Re: Keith Alan Manson

Case No. QCC2013-057

FORMAL CHARGES (without exhibits attached)

The Mediator Qualifications Board, Qualifications Complaint Committee, duly constituted pursuant to the Florida Rules for Certified and Court Appointed Mediators, having examined the Application for Circuit Court Mediator by Keith Alan Manson, hereinafter the Applicant, the attachments thereto, the information submitted by the Applicant, the Applicant's disclosed Criminal History and, thereafter, having reviewed the non-disclosed Criminal History and other documents and facts as set forth herein, to determine whether the Applicant meets the good moral character requirement as set forth in the Rules, the Qualification Complaint Committee finds probable cause that:

The Applicant fails to possess the good moral character as required by Rule 10.110, Florida Rules for Certified and Court Appointed Mediators, for any mediator certification by the Florida Supreme Court.

This finding is based on the following findings of fact, averred as follows:

- A. The Applicant was convicted in a general court-martial and sentenced to a term of confinement at the United States Disciplinary Barracks, Fort Leavenworth, Kansas, for conduct unbecoming and consensual sodomy as follows:
 1. The Applicant was charged with violations of the Uniformed Code of Military Justice, the facts of which were stipulated to before the Indiana Supreme Court, which recounted the misconduct as follows: “[o]n September 18, 1992, the respondent met a client (the “client”) twice in his capacity as legal assistance attorney for the NLSO. He advised her about issues related to her upcoming divorce and custody of a child from a previous marriage. The client and the respondent also discussed the possibility of dismissing a traffic ticket which she received on the base, although she ultimately paid the fine by mail prior to her scheduled hearing date. At the end of their second meeting on September 18, 1992, the respondent invited the client to accompany him to a military social function. She accepted, and they first went together to a bar, the “Tikki Hut.” Unable to locate the social function, they proceeded to the officer's club, then back to the Tikki Hut, where they discovered the function in progress in a picnic area adjacent to the bar. The client willingly accompanied the respondent to both places. At approximately 6:30 p.m., the

respondent and the client went back to his office at the NLSO. They engaged in sexual intercourse and oral sex in the NLSO courtroom”, *In Re Keith A. Manson*, No. 98S00-9604-DI-262 (Feb. 25, 1997). The opinion of the Indiana Supreme Court is attached hereto as Formal Charges Exhibit A and incorporated by reference herein.

2. The Indiana Supreme Court found that, “[t]he respondent's clandestine sexual foray with a client who had come to him for legal help at a moment of special vulnerability reflects a profound disrespect for the legal system by one sworn to “maintain the respect due to courts .” *See* Ind. Admission and Discipline Rule 22, Oath of Attorneys. Use of the court's official forum for the liaison aggravates the misconduct. Such actions erode the public's perception of the integrity of the legal profession. Accordingly, we find that the respondent violated Ind. Professional Conduct Rule 8.4(d) in that his conduct was prejudicial to the administration of justice”, *Id.*
 3. This conviction constitutes a felony offense under the laws of the State of Florida, *See* F.S. §775.08(1).
 4. The Applicant's Civil Rights were restored by the Office of Executive Clemency in 1994, *except* the right to own a firearm, Florida Parole Commission # FPC0461291. Therefore, while the applicant remains a convicted felon, his civil rights have been restored, except relating to possession of a firearm.
- B. The Applicant was suspended from the practice of law in Indiana for misconduct rooted in his behavior that led to the Court Martial, for six months, with a provision for automatic reinstatement, *In Re Keith A. Manson*, No. 98S00-9604-DI-262 (Feb. 25, 1997), Indiana Roll of Attorneys (Disciplinary History). The Indiana Roll of Attorneys record display is attached hereto as Formal Charges Exhibit B and incorporated by reference herein.
- C. The Applicant was conditionally admitted to the Florida Bar, thereafter suspended by emergency order and thereafter disbarred by the Florida Supreme Court. The entire path, from application, hearing, conditional admission, probationary term dovetailed with mandatory substance abuse treatment, to ultimate disbarment was riddled with disregard by the Applicant for the rules and ethical obligations of an attorney. The violations of the conditional admission were docketed, with the Clerk of the Florida Supreme Court, at SC09-2318. During the pendency of SC09-2318 proceedings, the Applicant was again petitioned for additional violations, resulting from actions he took when suspended in SC09-2318. This resulted in a ‘new’ proceeding docketed at SC10-1187. Those two disbarment proceedings were consolidated by the Florida Supreme Court and sent to the same hearing Referee. The full extent of the violations were set forth by Judge Peter T.

Miller, of the 7th Judicial Court of Florida, sitting as Bar Referee, in the formal Report of Referee filed on October 4, 2010 and approved in full by a unanimous Florida Supreme Court on July 20, 2011. The Referee's Report is attached hereto as Formal Charges Exhibit C and incorporated by reference herein. The Florida Supreme Court Opinion is attached hereto as Formal Charges Exhibit D and incorporated by reference herein. The Docket History of SC09-2318 and SC10-1187 is attached hereto as Formal Charges Exhibit E and incorporated by reference herein. The Applicants disbarment and the record evidence from those proceedings are evidence of a lack of good moral conduct.

1. The Applicant had a lack of candor on his sworn bar application and during his testimony at his 1995 investigative hearing with the Florida Board of Bar Examiners.
2. The Applicant had a lack of candor on his Florida Insurance License Application.
3. The Applicant had a lack of candor on his 1996 residential loan application.
4. The Applicant drove a car while intoxicated including his 1985 and 1998 arrests for DUI.
5. The Applicant was conditionally admitted to the Florida Bar and required to abstain from alcohol, controlled substances unless prescribed, attending AA/NA meetings, urinalysis screenings and other obligations. The Applicant executed an agreement with the Florida Supreme Court binding himself and agreeing to abide by the terms that conditionally admitted him to the bar. The entity to monitor the Applicant was the Florida Lawyers Assistance Program.
6. On December 15, 2009, the Florida Bar filed a Petition for Contempt and a Rule to Show Cause, averring that the Applicant had violated multiple conditions of his contract with the Florida Supreme Court and thereby his conditional admission to the Bar.
7. The Florida Supreme Court issued a Rule to Show Cause to the Applicant, as reflected in the docket of the Florida Supreme Court under SC09-2318, indicating the Court "command[s] you, Keith Alan Michael Manson, to show cause on or before January 5, 2010, why you should not be held in contempt of this Court and be suspended for 90 days from the practice of law for violating the provisions of your conditional admission order and be required to continue your compliance with the terms and conditions of your conditional admission under the Supreme Court Case Number SC05-399 (TFB File No. 2005-80,027(ACA)) during the suspension period

for the reasons set forth in The Florida Bar's Petition. The Florida Bar may serve its reply on or before January 15, 2010”.

8. The Applicant filed a response and on March 19, 2010, the Florida Supreme Court, “concludes that the series of acts and omissions on the part of respondent constitute a serious violation of the terms of respondent's conditional admission in Case No. SC05-399, a conditional admission authorized pursuant to Rule 1-3.2(b) of the Rules Regulating the Florida Bar. The Court expects strict adherence to all the terms and conditions set forth in conditional admissions. In this case, the violations over a two-year period of time were not brought to the attention of this Court previously, and the Court is concerned about the number of violations over this period of time. The Court is not persuaded by the reasons for non-compliance provided by the respondent. Accordingly, the Court hereby suspends the respondent from the practice of law for 90 days, effective thirty days from the date of this order so that respondent can close out his practice and protect the interests of existing clients. If respondent notifies this Court in writing that he is no longer practicing and does not need the thirty days to protect existing clients, this Court will enter an order making the suspension effective immediately. Respondent shall accept no new business from the date this order is filed until he is reinstated. The Court further refers this matter to the Chief Judge of the Seventh Judicial Circuit for the appointment of a referee to determine if any other sanctions should be imposed, including the revocation of the respondent's conditional admission. It is so ordered”.
9. On June 21, 2010 the Florida Bar filed for a *new* Rule to Show Cause and the Florida Supreme Court responded by “command[ing] you, Keith Alan Michael Manson, to show cause on or before July 6, 2010, why you should not be held in contempt of this Court and be disbarred and suspended indefinitely from the practice of law for violating the provisions of his suspension order for the reasons set forth in The Florida Bar's Petition. The Florida Bar may serve its reply on or before July 16, 2010”.
10. In this new case (SC10-1187), it was averred that after the Applicants suspension in SC09-2318 became effective, he failed to properly notify a client, continued to hold himself out as an attorney who could practice, notwithstanding his suspension and filed a false affidavit with the Florida Bar referencing his compliance with the suspension. This occurred specifically in reference to the case of *Chase Bank, N.A. v. James Gray*, 10-SC-168 MA (Duval County).
11. Insofar as SC09-2318, the Applicant failed, on multiple occasions to abide by his contract, as noted by Judge Miller, “[i]t is clear from the Order of the Supreme Court

of Florida of March 19, 2010 suspending the respondent as well as the testimony and evidence presented at the September 20, 2010 final hearing that respondent is in fact guilty of violating his agreement with the Supreme Court of Florida". Report of Referee at 12.

12. Insofar as SC10-1187, as noted by Judge Miller, "[i]t is clear that respondent did, in fact, hold himself out as an attorney and remain counsel of record in a client's case without notifying the presiding judge, his clients, or opposing counsel of his suspension. It is further clear that respondent provided a false affidavit to The Florida Bar by failing to list the Gray matter on his required affidavit to the bar at the time when his conduct should have demonstrated the highest regard for the rules and their requirements", *Id.*
 13. The Referee found the following aggravating factors, and they are equally as pertinent in these Formal Charges, "dishonest or selfish motive", "a pattern of misconduct", "multiple offenses", "submission of false evidence, false statements, or other deceptive practices during the disciplinary process" and the "vulnerability of the victim", *Id.* at 15.
 14. The Report of the Referee was adopted by the Florida Supreme Court and the Applicant was disbarred by order of the Court (Wednesday, July 20, 2011).
- D. The Applicant has failed to notify the Indiana Bar of his suspension(s) with the Florida Bar and presently there is no record evidence on file in the Online System of the Indiana State Bar Roll of Attorneys that the Applicant has informed the Indiana Supreme Court of his disbarment in Florida, as required by the Indiana Rules and the Indiana Supreme Court. This is indicative of a repeated failure to abide by the Rules and a willful failure to report disbarment and presents a lack of good moral conduct. Furthermore, the Applicant, supplementing his lack of candor, did not disclose to the Dispute Resolution Center that he is currently a member in the Indiana Bar.
1. The Report of the Referee submitted and approved by the Florida Supreme Court noted the following, "[a]s further indication of respondent's disregard for the rules of ethics it is noted that respondent acknowledged, through questioning by the bar, he was a member of the Indiana Bar, that the Indiana rules of professional conduct required him to notify them of his Florida suspension; and that he had failed to provide them with such notice. Respondent indicated that he was unaware of the requirement and that he had no active cases in Indiana but acknowledged that he paid his yearly dues to Indiana and was a member in good standing there". Report of Referee at 11-12.

2. There is no record evidence that the suspensions were ever reported to the Indiana bar, as the last record activity of discipline within the Indiana system is the 6 month suspension in 1997.
 3. The Applicant remains, via the Indiana Roll of Attorneys, a member in good standing of the Indiana Bar at Member Number 16132-29.
 4. The Applicant was disbarred from the practice of law by the Florida Supreme Court on July 20, 2011. There is no record evidence that the Applicant has notified the Indiana Bar. Indiana Rules of Court and Rules for Admission to the Bar and Discipline of Attorney's Rule 23, Section 28, indicates that there is a reciprocal disbarment provision if a member is disbarred in any other jurisdiction. There is also a reporting requirement for the member to alert the Indiana Bar should an out of jurisdiction disbarment occur.
 5. As evidenced by no record proceeding occurring in Indiana and that he is still a "member in good standing" some *years* after disbarment indicates non-reporting and a willful and now repeated intent to not inform the Indiana Bar.
- E. The Applicant was untruthful and/or intentionally omitted prior criminal convictions of crimes in his Application for Mediator Certification submitted to the Florida Dispute Resolution Center September 24, 2013, as required by Section II of the application. All this notwithstanding the fact that the applicant swore or affirmed by jurat and oath to the contents of the application. By operation of Rule 10.110(d), the presumption of the knowing and willful violation of failing to supply the information in the applicant attaches.
- F. The Applicant, in his Application to the Dispute Resolution Center, willfully failed to disclose his conviction on June 9, 2011, in Case Number 2011 CT 00387, in the County Court of Clay County, Florida, to the First Degree Misdemeanor counts of Driving Under the Influence (DUI) 2nd Offense Outside of Five Years, contrary to Florida Statute 316.193 and Resisting or Obstructing an Officer without Violence, contrary to Florida Statute 843.02. The Applicant was adjudged guilty and adjudicated guilty of both offenses and placed on 11 months of reporting probation with multiple conditions. The Certified Judgment and Sentence, under seal of the Clerk of the Court is attached hereto as Formal Charges Composite Exhibit F and incorporated by reference herein. The Applicant was required to disclose this conviction, and failed to do so, notwithstanding a

requirement under Section II of the Application requiring disclosure of a conviction of a misdemeanor in the first degree.

1. The Applicant plead guilty, and as a result, the conduct in the sworn arrest affidavit authored by Deputy Sheriff R.E. Russel (06787) of the Clay County Sheriff's Office Case Number 2011-005429 is admitted. The Adult Arrest Report is attached hereto as Formal Charges Composite Exhibit F. In sum, Saturday, February 5, 2011 in Clay County Florida, the Applicant operated his vehicle in a manner that indicated he was impaired and thereafter did not immediately pull over when commanded (via emergency equipment). The Applicant refused to roll down his window when told to by Sgt. Coldiron. The applicant appeared intoxicated. The applicant thereafter refused to exit his vehicle when instructed by Deputy Russel. When the Applicant finally exited his vehicle, indicia of impairment was apparent. Upon being told he was under arrest, the Applicant failed to put his hands behind his back and tried turning around. The Applicant was redirected to the ground and arrested. Inventory of the Applicant's vehicle revealed a half full and cold bottle of Mike's Hard Lemonade. The Applicant refused to provide a lawful sample of his breath. The Deputy noted that a records check revealed a prior refusal by the Applicant to submit to breath-testing. The applicant was charged by the police with DUI, Refusal to Submit to Breath Test and Resisting an Officer without Violence.
 2. This event occurred notwithstanding the fact that the Applicant had an open and active disciplinary case in the Florida Supreme Court.
 3. The Applicant's probation was early terminated on December 22, 2011.
- G. The Applicant, in his Application to the Dispute Resolution Center, willfully failed to disclose his conviction on September 5, 2012, in Case Number 16-2012-CT-003649-AXX-MA, in the County Court of Duval County, Florida, to the First Degree Misdemeanor count of Refusal to Provide Breath, Blood or Urine (Second Refusal), contrary to F.S. 316.1939. The Certified Judgment and Sentence, under seal of the Clerk of the Court is attached hereto as Formal Charges Composite Exhibit G and incorporated by reference herein. The Applicant was adjudged guilty and placed on 12 months of reporting probation with multiple conditions. The Applicant was required to disclose this conviction, and failed to do so, notwithstanding a requirement under Section II of the Application requiring disclosure of a conviction of a misdemeanor in the first degree.
1. The Applicant plead guilty and as a result, the conduct in the sworn arrest affidavit authored by Deputy Sheriff F.L. Christmas (6715) of the Jacksonville Sheriff's Office

Incident Number 2012-156585 is admitted. The Arrest and Booking Report is attached hereto as Formal Charges Composite Exhibit G and incorporated by reference herein. In sum, Wednesday, February 29, 2012 in Jacksonville Florida, the Applicant operated his vehicle at high speed, 77 mph in a 55 mph zone. The Applicant was slow to stop, when signaled to stop, and, upon interaction, the Applicant smelled of alcohol and exhibited indicia of impairment. The Applicant performed poorly on the Standard Field Sobriety Exercises and was arrested for DUI. The Applicant indicated to the Deputy Sheriff that he knew his license was suspended for DUI. The applicant indicated he would refuse to provide a lawful sample of his breath. Notwithstanding the fact that the Deputy Sheriff advised him of the Implied Consent law. The Applicant was charged by the police with DUI, Driving While License Suspended and Refusal to Submit to Breath Testing.

2. The Applicant was arrested for this DUI, despite the fact he had been arrested for the same offense about a year earlier, was recently convicted of the same offense and had only recently been released from probation.

H. A Complaint by the Dispute Resolution Center was filed on January 10, 2014 and sent to the Applicant. In a Sworn Response from the Applicant, received by the Dispute Resolution Center on February 7, 2014, (both the Complaint and the Sworn Response are attached hereto as Formal Charges Exhibit H and incorporated by reference herein), the Applicant was not candid throughout as follows:

1. The Applicant downplayed the significance of the Court Martial and equated his behavior, found to be misconduct by the Indiana Supreme Court and conduct unbecoming an Officer in the United States Navy, by offering that his conduct would now fall under the now rescinded "Don't Ask Don't Tell" policy.
2. The Applicant did again not reveal his prior convictions, and did not mention any instance of DUI in relation to his substance abuse issue, and instead downplayed the significance of any substance abuse issue.
3. The Applicant downplayed the seriousness of the failure to inform a client after a suspension by the Florida Supreme Court by averring, "That client also confided that they felt more hassled and distressed by the Florida Bar Investigation then by the case".

I. The Applicant, in the cumulative and repeated incidents listed herein lacks rehabilitation and intentionally or by omission omits information in his Application and Response, notwithstanding an obligation to do so.

J. The Applicant was provided with an Amended QCC Complaint, wherein he was given the opportunity to respond, as he did to the initial Complaint, the amended component addressing the undisclosed misdemeanor convictions and the Indiana Bar Membership and No Proof of Disclosure of Florida Disbarment issues. The Applicant responded *requesting* his application be withdrawn and not considered. The written *request* is attached hereto as Formal Charges Exhibit I and incorporated by reference herein. That *request*, by operation of the filing of the instant formal complaint, is denied by the QCC and the lack of a response addressing the merits of the Amended Complaint are further indication of a lack of candor and a failure to admit or address responsibility. It also is indicative of an Applicant who seeks to evade the investigative and adjudicative functions, as enumerated in the Rules, particularly Rule 10.110(b), to a just conclusion. All of this is further indicative of the Applicant's lack of good moral character, lack of candor, lack of remorse and willful attempt(s) to evade reporting requirements.

AND NOW these factual allegations, when evaluated pursuant to the criteria set forth in Rule 10.110(c)(4), demonstrate that the applicant does not possess the good moral character necessary for Certification by the Florida Supreme Court, in any certification area:

1. The conduct of the Applicant demonstrates an inability and/or unwillingness to comply with the laws of the Military and/or the State of Florida, the Rules and court order relevant to the practice of mediation as required by Rule 10.520. Such conduct would necessarily interfere with the mediator's duties and responsibilities as considered under Rule 10.110(c)(4)(A).
2. The Applicant's conduct was serious, cumulative and continuing in nature, with a demonstrated inability to conform to the laws or refrain from conduct that threatens the life and safety of the community at large. Conduct that has resulted in recent convictions and reflective of an ongoing pattern, presenting serious issues under Rule 10.110(c)(4)(C, D, E, F, G and H).
3. The Applicant was not candid, in multiple regards, with the Dispute Resolution Center in his application or Sworn response to the QCC Complaint, contrary to and to be considered under Rule 10.110(c)(4)(J).
4. The Applicant was disbarred by the Florida Supreme Court under two separate proceedings, one commenced while the other was still pending, to be considered under Rule 10.110(c)(4)(K).
5. The Applicant's lack of candor, forthrightness and blame shifting are indicative of a lack of good moral character and a complete lack of remorse or rehabilitation under Rule 10.110(c)(4)(I).

6. The Applicants age, education and prior disciplinary action were insufficient to dissuade and prevent recidivism by the Applicant indicating a deliberateness to his actions despite being of age and past experience to know better, under Rule 10.110(c)(4)(D).
7. That the presumption afforded in Rule 10.110(d) is averred.

BASED ON THE FOREGOING, with probable cause found, the matter is hereby forwarded for assignment to a hearing panel pursuant to Rule 10.800(a)(3).

QCC Chair: 

Date: 8-13-14

Copies, at this time, to

Florida Dispute Resolution Center

Applicant: Keith Alan Manson

Copies shall have the same force and effect as originals.

Exhibits "A" through "T" attached, having been incorporated herein by reference.