

# COMPLAINT

## VIRGINIA STATE BAR

**Mail to:  
VIRGINIA STATE BAR  
INTAKE OFFICE**

707 East Main Street, Suite 1500  
Richmond, VA 23219-2800  
Telephone: 804/775-0570

**We cannot accept complaints  
about lawyers electronically.**

NOTE: Send in this form if you wish to file a formal complaint that a lawyer has acted unethically. The Complaint might result in discipline to the lawyer. If you are seeking other remedies against the lawyer, you may need to seek legal advice from a lawyer in private practice. Also, the Bar may require your further involvement in an investigation of your complaint by asking you to be interviewed by a Bar investigator and/or to participate at a hearing.

**YOUR  
NAME:**

Mr.  
Mrs.  
Miss  
Ms.

Iviewit Holdings, Inc. (a Delaware corporation)

*first*

*initial*

*last*

**YOUR  
ADDRESS:**

10158 Stonehenge Circle, Suite 801

*street*

Daytime Telephone No.:

home (561) 364-4240

work

Other Telephone No. and  
times you can be reached:

home (561) 523-2240

work

Mobile

Boynton Beach

Fla.

33437

*city*

*state*

*zip code*

**LAWYER'S  
NAME:**

William

J.

Dick

*first*

*initial*

*last*

**LAWYER'S  
ADDRESS:**

*lawyer's law firm, if known*

115 Las Brisas Circle

*street address or P.O. Box*

Lawyer's Telephone No.:

(561) 547-8006

Hypluxo


Fla.

33462

*city*

*state*

*zip code*

See next page for more information we need from you to analyze your complaint. 

LAWYER'S  
ACTIONS  
COMPLAINED  
OF:

See attached.

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*(Continue on a separate page if you need more space. Also, attach **copies** of any documents that help explain your complaint.)*

 **P. Stephen Lamont**  
Signature Valid  


Digitally signed by P. Stephen Lamont  
DN: cn=P. Stephen Lamont, o=Iviewit Holdings, Inc., ou=Corporate, c=US  
Date: 2003.09.23 19:49:21 -04'00'

**YOUR  
SIGNATURE:**

Chief Executive Officer (Acting)

DATE: 09/23/03

**COMPLAINT MUST BE SIGNED AND DATED**

See next page for more information we need from you to analyze your complaint. 🖱️

See attached.

List the names, addresses, and phone numbers of persons who might be able to give additional information about your complaint:

Horizontal lines for listing names, addresses, and phone numbers.

PLEASE ANSWER THE FOLLOWING QUESTIONS:

1. Have you or a member of your family complained to us about this lawyer before? [ ] yes [x] no
If yes, please state when you complained and the outcome of that complaint.

Horizontal lines for providing details for question 1.

2. Have you filed a complaint or legal action about this matter anywhere else? [ ] yes [x] no
If yes, state where and the outcome.

Horizontal lines for providing details for question 2.

3. Did you hire this lawyer? [x] yes [ ] no If yes, give the approximate date you employed him/her, the nature of your legal case, and estimate how much money, if any, you paid him/her.

Employed on or about April 2000 to May 2001, with an engagement pertaining to patent

prosecution counsel, and estimated paid billings of \$200,000.

Horizontal lines for providing details for question 3.

4. If you did not hire the lawyer, what is your connection with the lawyer?

Horizontal lines for providing details for question 4.

5. Is your complaint only that you think the lawyer charged you too much? [ ] yes [x] no
If yes, you should contact the Virginia State Bar at 804/775-0500 and ask for information on fee dispute resolution.

6. Have you read the pamphlet describing the Bar's complaint process? [x] yes [ ] no

## **Lawyers actions complained of:**

### **William J. Dick**

1. **Knowing and willful misrepresentations to the company with regard to his past involvement in patent malfeasances with Brian G. Utley at Utley's past employer, Diamond Turf Lawnmower.**
  - a. **Utley was a past President of the company and formerly a President of Diamond Turf Lawnmower and had referred Dick without reference to their past patent disputes at Utley's prior employer, which led to the termination of Utley and the closing of Diamond Turf Lawnmower.**
  - b. **These misrepresentations and frauds have led to similar damage to the Company, as a result of the stolen inventions by Utley, aided and abetted by Dick, Boehm and Becker. Moreover, the company found patents written into Utley's name, not disclosed or assigned to the company, and that Dick was fully aware that inventors Bernstein, Schirajee, Rosario, and Friedstein had developed the inventions. Blakely Sokoloff Taylor and Zafman LLP discovered these patents, and then attempted to re-assign said falsely filed and stolen patent applications to the company.**
2. **Perpetrating a fraud on the USPTO, by submitting applications with false information and wrong inventors.**
3. **Knowing and willful misrepresentations to the company's investors, including Wachovia Securities, a unit of Wachovia Corp., a registered bank holding company in Charlotte, N.C., by Dick and Utley of patent applications filed and inventions covered.**
4. **Knowingly committing fraud of USPTO, company shareholders, and potential investors by switching inventors and invention disclosures.**
5. **Participation in a civil and criminal conspiracy to bury patent applications and inventions.**
6. **Not reporting information to proper tribunals regarding Rubenstein and Joao malfeasances.**
7. **Furthering work of Rubenstein and Joao to not capture inventions and identify inventors;**
8. **Knowing and willful destruction of company records**
9. **Aiding and abetting Utley in filing patents in Utley's name disclosed to Dick under attorney-client privilege.**