

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

**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

LAWYER'S
ACTIONS
COMPLAINED
OF:

See attached.

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

YOUR
SIGNATURE:



Signature Valid

P. Stephen Lamont



Chief Executive Officer (Acting)

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

DATE:

09/23/03

COMPLAINT MUST BE SIGNED AND DATED

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

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

See attached.

PLEASE ANSWER THE FOLLOWING QUESTIONS:

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

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

3. Did you hire this lawyer? 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.

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

5. Is your complaint only that you think the lawyer charged you too much? yes 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? 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.