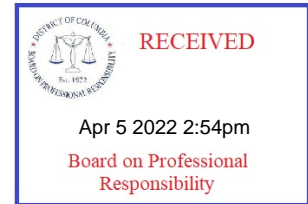


**DISTRICT OF COLUMBIA COURT OF APPEALS
BOARD ON PROFESSIONAL RESPONSIBILITY**

In the Matter of	:	
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MEHAK NAVEED, ESQUIRE	:	Disciplinary Docket No. 2019-D191
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Respondent	:	
	:	
	:	
A Member of the Bar of the	:	
District of Columbia Court of Appeals	:	
Bar Number: 1032942	:	
Date of Admission: July 8, 2016	:	



SPECIFICATION OF CHARGES

The disciplinary proceedings instituted by this petition are based upon conduct that violates the standards governing the practice of law in the District of Columbia as prescribed by D.C. Bar Rule X and Rule XI, § 2(b).

Jurisdiction for this disciplinary proceeding is prescribed by D.C. Bar R. XI. Pursuant to D.C. Bar R. XI, § 1(a), jurisdiction is found because:

1. Respondent Mehak Naveed is a member of the Bar of the District of Columbia Court of Appeals, having been admitted on July 8, 2016, and assigned Bar Number 1032942. Respondent is not licensed to practice law in any other state.

2. From at least June 13, 2018, through approximately February 3, 2020, Respondent was one of two managing lawyers at Meehan & Naveed, LLP, a now

defunct law firm located in the District of Columbia and Houston, Texas. Her partner was James P. Meehan, III.

The facts giving rise to the charges of misconduct are as follows:

3. On June 13, 2018, Respondent opened DC IOLTA Trust Account (ending x6746) at Bank of America. Respondent held the account under the name “Meehan & Naveed LLP” at 1025 Connecticut Ave, N.W., Suite 1000, Washington, D.C. 20036. Respondent and Mr. Meehan were the only two signatories on the IOLTA account.

4. On June 4, 2019, a check was issued from the IOLTA account in the amount of \$1,677.71. On June 6, 2019, the check was presented for payment, causing a negative account balance of \$1,112.71.

5. By letter dated June 10, 2019, Bank of America notified Disciplinary Counsel of the overdraft to Respondent’s IOLTA account. On June 27, 2019, Disciplinary Counsel forwarded the overdraft notice to Respondent.

6. On August 12, 2019, Disciplinary Counsel again wrote to Respondent and requested a substantive, written response explaining the circumstances of the overdraft. Disciplinary Counsel also requested records for the period of May 6, 2019, through August 12, 2019, reflecting the deposit and disbursement of all funds into

the escrow account as required by Rule 1.15 of the D.C. Rules of Professional Conduct.

7. On September 1, 2019, Respondent submitted a response to Disciplinary Counsel. She represented, in relevant part, that the firm maintained a master IOLTA ledger and individual client ledgers for each client whose funds were placed in the IOLTA account. Respondent, however, did not provide any of the financial records.

8. On November 27, 2019, Disciplinary Counsel issued Respondent a subpoena *duces tecum* directing her to provide copies of the financial records by December 11, 2019. Disciplinary Counsel served an identical copy of the subpoena on Mr. Meehan.

9. On December 6, 2019, Respondent called Disciplinary Counsel and asked for an extension of time to respond, which Disciplinary Counsel granted. Respondent's new deadline was December 27, 2019.

10. On December 28, 2019, Respondent requested an extension of time through December 30, 2019, due to a purported injury to her toe. Disciplinary Counsel granted Respondent's request and provided a new deadline of December 31, 2019. Respondent did not respond to the subpoena by the December 31, 2019 deadline or timely request an extension of time.

11. Mr. Meehan requested separate extensions of time, which Disciplinary Counsel also granted. On January 10, 2020, Mr. Meehan, through counsel, notified Disciplinary Counsel that he had relocated to California, and he was attempting to work with Respondent regarding production of the financial records.

12. On January 23, 2020, Disciplinary Counsel wrote to Respondent by certified mail and email, notifying her that Disciplinary Counsel had not received a response and requesting that she promptly submit the financial records.

13. On January 24, 2020, Mr. Meehan wrote to Disciplinary Counsel and advised that Respondent “control[ed] the Texas office” and that several attempts to procure documents from Respondent resulted in no success.

14. On February 3, 2020, Mr. Meehan, through counsel, wrote to Respondent and formally withdrew and disassociated from Respondent’s firm.

15. Between January 31, 2020, and February 24, 2020, Respondent and Disciplinary Counsel exchanged emails in which Respondent made various representations concerning her failure to provide the financial records. Respondent claimed that she had a “series of serious health setbacks,” including a “hospitalization with level two trauma injuries due to an accident[.]” She stated that if Disciplinary Counsel required proof, that she would be “happy to oblige.” Disciplinary Counsel replied and asked for proof, but Respondent never provided it.

16. On February 12, 2020, Disciplinary Counsel emailed Respondent, reminded her that she had not produced the financial records and medical documentation, and requested that she submit them by February 14, 2020.

17. On February 14, 2020, Respondent replied to Disciplinary Counsel and stated that while she was gathering the healthcare documents in her “feeble condition,” she underwent an “unanticipated emergency procedure at the ER last week[.]” She stated that she would provide what Disciplinary Counsel requested by Monday, February 17, 2020.

18. Respondent failed to provide the financial records or any medical documentation by February 17, 2020.

19. On February 18, 2020, Respondent emailed Disciplinary Counsel and explained that the reason she had not provided notes from her healthcare providers was because they were not “complete.”

20. On February 24, 2020, Respondent emailed Disciplinary Counsel and stated that she was “finally able to get back to work today[.]” and Disciplinary Counsel would be “receiving the response shortly.” Respondent did not provide the financial records or any medical documentation.

21. On February 26, 2020, Disciplinary Counsel filed a motion to enforce its November 27, 2019 subpoena *duces tecum*. Respondent did not file a response.

On March 9, 2020, Respondent emailed Disciplinary Counsel and confirmed that she received the motion.

22. From March 9 to 26, 2020, Respondent and Disciplinary Counsel exchanged emails about her proposed submission of the response. Respondent stated that her response was “more or less 200 pages.”

23. On March 11, 2020, the District of Columbia Court of Appeals granted Disciplinary Counsel’s motion to enforce and served a copy of its order on Respondent. The Court ordered that Respondent comply with the terms of Disciplinary Counsel’s subpoena within 10 days. The Court emailed a copy to Respondent the same day.

24. Respondent failed to produce any of the financial records by March 22, 2020, as directed by the Court’s order.

25. On March 26, 2020, Respondent emailed Disciplinary Counsel and stated, in pertinent part, that “[o]ne way or another, the response will be sent [...] at the latest by tomorrow.” She admitted that it was “being prolonged for no reason.” Respondent failed to provide her response the next day.

26. On March 31, 2020, Respondent stated that she could not send the response via FedEx, but that she would send the documents electronically “as soon as possible.”

27. On April 28, 2020, Disciplinary Counsel emailed Respondent and reminded her that no response had been received. Later that day, Respondent replied that she would email Disciplinary Counsel the response the next day because she was “unable to send the response from [her] phone.” She assured Disciplinary Counsel that the response “has been complete[.]” Respondent did not provide the response by the next day.

28. On December 8, 2020, Disciplinary Counsel emailed Respondent and reminded her that no response had been received regarding the subpoena or her explanations for her delay. Respondent was provided another copy of the Court’s March 11, 2020 Order.

29. On December 9, 2020, Respondent emailed Disciplinary Counsel, blaming her delayed response on “COVID-19 related mailing limitations” and “unprecedented challenges (especially with [her] health)[.]” In response, Disciplinary Counsel requested all information, including medical records, to support her “unprecedented challenges” by December 18, 2020.

30. Respondent failed to respond or supply any medical documentation.

31. Before, during, and after December 2020, Disciplinary Counsel advised Respondent that she could produce the records by U.S. Postal Service, by email,

through a secure file transfer service, SendThisFile.com, or through any electronic delivery service of her choice.

32. On February 24, 2021, Disciplinary filed in the Court of Appeals a Motion for Order to Show Cause regarding Respondent's violation of the Court's March 11, 2020 Order. Disciplinary Counsel served Respondent a copy via email on the same day.

33. On March 6, 2021, Respondent filed in the Court of Appeals a Motion for Extension of Time. She stated that in December 2020, she experienced symptoms of COVID-19, in January 2021 the symptoms "escalated," and in February 2021 she was diagnosed with a "lingering upper respiratory tract infection, among other preexisting condition(s)." In support, Respondent attached her own affidavit and notes from a February 22, 2021 medical visit. Respondent claimed that she was unable to respond to Disciplinary Counsel's Motion for Order to Show Cause because she needed time to rest and recover. Respondent requested an extension of 60 days.

34. Respondent did not file a response to Disciplinary Counsel's motion or otherwise supply the financial records within the 60 days she requested.

35. On June 8, 2021, Disciplinary Counsel filed with the Court of Appeals a Request for Action on Disciplinary Counsel's Motion for Order to Show Cause.

36. In response, on June 11, 2021, Respondent filed another Motion for Extension of Time. Respondent stated that she needed seven days in order to prepare an “adequate response.” Respondent did not file a response to Disciplinary Counsel’s motion or otherwise supply the financial records within the seven days she requested.

37. While Respondent was claiming to the Court and Disciplinary Counsel that she was unable to respond, she continued to practice immigration law and entered her appearance in at least eight matters while her responses were outstanding.

38. On June 29, 2021, the Court entered an order directing Respondent to show cause, within 10 days, why she should not be held in civil and/or criminal contempt, for failing to comply with the Court’s March 11, 2020 Order. The Court emailed a copy to Respondent.

39. Respondent failed to respond to the Court’s Order to Show Cause. Respondent did not provide the financial records to Disciplinary Counsel, in continued violation of the Court’s March 11, 2020 Order.

40. On August 16, 2021, the Court of Appeals assigned the Honorable Laura A. Cordero to serve as judge for the purpose of conducting a contempt hearing regarding Respondent’s violation of its March 11, 2020 Order. On September 29,

2021, Judge Cordero scheduled a remote status hearing for October 8, 2021, in the D.C. Superior Court.

41. On September 30, 2021, Disciplinary Counsel emailed Respondent, attached a copy of its November 27, 2019 subpoena, and requested that she submit the financial records before October 8, 2021. Respondent did not respond.

42. On October 8, 2021, the court held the remote status hearing. At the hearing, Judge Cordero asked Respondent whether she was “going to be providing the documents or whether we need[ed] to proceed and set a hearing for a contempt hearing.” In response, Respondent claimed that the package of over 200 pages “[had] been... mailed, physically mailed to [Disciplinary Counsel] as of today” via USPS priority two-day mail. In fact, the package had not been physically mailed to Disciplinary Counsel that day.

43. The same day, Respondent caused the label to be emailed to Disciplinary Counsel via the USPS website. The email notified Disciplinary Counsel that a package was scheduled to be shipped that day. Attached was a copy of the “Priority Mail 2-Day” shipping label with tracking number.

44. Also on October 8, 2021, the court issued an order scheduling a status hearing on October 18, 2021. The court noted that Respondent “represented that she

had sent documents responsive to the subpoena” and ordered her to “email a picture of the priority mail receipt” to Disciplinary Counsel by the end of the day.

45. Disciplinary Counsel emailed Respondent, stated that at the hearing she said she had already sent the financial records, and requested that she provide a picture of the postal receipt. Respondent replied, falsely, that “[w]e indeed created the label,” and stated that she reached out to her assistant “because [she] did not have access to that information when asked by the judge[.]”

46. Shortly thereafter, that same day, Disciplinary Counsel emailed Respondent and asked her again for a photo of the receipt. Respondent replied only that the “packet is in the USPS drop box.” Respondent then asked Disciplinary Counsel whether it wanted her “to take a picture of [her] dropping it off in the mailbox[.]” She then stated: “[i]f you would like for me to provide an actual picture of me dropping off the packet in the mailbox, then please inform me accordingly.”

47. By October 12, 2021, Disciplinary Counsel had not received Respondent’s financial records. Tracking information indicated that USPS was still awaiting the item. That day, Disciplinary Counsel emailed Respondent and asked both for a copy of the receipt, as well as a photograph of the packet being dropped off (in its native format). Disciplinary Counsel stated again its recollection that Respondent had advised the court that she had sent the package prior to the hearing.

Disciplinary Counsel asked Respondent to confirm she “actually sent the packet containing the responsive documents *before* the October 8 hearing” (emphasis in original).

48. Respondent did not respond; nor did she provide either the “picture of the priority mail receipt” as the court required or the photograph of the packet she offered to provide Disciplinary Counsel.

49. Contrary to Respondent’s representations about mailing her financial records before the hearing, Respondent knew that she had not in fact mailed Disciplinary Counsel documents responsive to the subpoena.

50. On October 18, 2021, the court held a second hearing. At the hearing, the court asked Respondent: “[D]id you send [Disciplinary Counsel] a copy of the receipt for . . . mailing the document.” Respondent said, “Yes.” Disciplinary Counsel explained to the court that Respondent had not sent a picture of a priority mail receipt, as she had been ordered to do; she sent a shipping label with a tracking number from USPS, which indicated USPS was still “awaiting the item.” Respondent then claimed that she was previously “very clear” with the court that she was *not* sure whether the package was in fact mailed. She stated falsely, “I didn’t say . . . that I had already mailed it.” Still later, she again contradicted herself,

claiming that she was sure that she had mailed her subpoena response and had dropped it in a blue post office box.

51. Respondent repeated the false claim that she had “generated” or “created” the label prior to the October 8 hearing. Respondent knew that she had not created the label prior to the hearing.

52. Also at the October 18, 2021, hearing, Respondent said that she would provide her Google Drive documents to Disciplinary Counsel electronically. (“I guess I can do that. Not a guess, I will do that.”). The court told her, “Well, this is two years in the making so however much time it takes you, I think you can handle it.” The court added:

This is pretty serious, Ms. Naveed. I really -- I don't -- if you want to have a contempt proceeding, I don't think -- if you just provide the documents, we can avoid this whole situation. It's going to have a profound impact on your career. You need to turn those documents over...and this is two years in the making, Ms. Naveed. Two years.

Respondent said she would start sending the documents to Disciplinary Counsel electronically “within the hour.” Respondent also said she would send an email to Disciplinary Counsel every day to confirm whether they were receiving the documents she was sending electronically. But Respondent did not provide her Google Drive documents to Disciplinary Counsel electronically as she told the court she would, nor did she send confirmation emails to Disciplinary Counsel.

53. On October 18, 2021, the court issued an order scheduling a third status conference for November 1 and directed Respondent to email the financial records to Disciplinary Counsel by October 29. Respondent was also required to upload copies to the court via a Box.com link provided by the court.

54. On October 21, 2021, Disciplinary Counsel emailed Respondent, attached a copy of the court's order, and requested, in relevant part, that she provide the financial records. Respondent did not respond. She did not email or otherwise provide any financial records to Disciplinary Counsel before the November 1 hearing. Nor did she upload any documents to the court via Box.com.

55. On November 1, 2021, a third status hearing was held. Because Respondent had not provided any documents, the court scheduled a civil contempt hearing for November 18 and 19, 2021. Respondent said that she had the emails "ready to go" and would send the documents to Disciplinary Counsel.

56. The next day, Disciplinary Counsel emailed Respondent and advised her that it had not received anything from her, reminded her that she represented that she had the emails "ready to go," and requested that she submit the financial records promptly. She did not respond.

57. On November 17, 2021, Disciplinary Counsel wrote to Respondent and told her that it had not received anything from her. She did not respond.

58. On November 18, 2021, the court held a fourth hearing. Respondent represented that she was “trying to get this hand drop (*sic*) – like, you know, at a drop box.” During the video call, Respondent displayed what she claimed were financial records that she said she had “printed out.”

59. Respondent continued to provide various reasons for her failure to provide the financial records. She told the court:

[O]ne thing, Your Honor, before I go forward. It's not just me involved in this case, I have a partner, so I have to get his approval on a lot of these things before I can go forward. So it's not as convenient for me to go ahead and email back immediately, or that's why sometimes I call Mr. Kalantar because it's literally like -- it's not just me involved. Like whatever I submit, it's pretty much going to be (indiscernible) by my partner and for his case.

So that's the -- that's what causes delay oftentimes for me, especially if I'm not (indiscernible), or whatever, whatnot, the case may be. So that's the first thing. I want to establish that, and perhaps I should have done that when we first -- were arguing our first hearing.

60. Contrary to her statements to the court, Respondent knew that she did not have a law partner and that Mr. Meehan had disassociated with Respondent and her firm in February 2020. She did not seek Mr. Meehan's approval to produce her financial documents, and Mr. Meehan had not prevented or otherwise delayed the production of the financial records to Disciplinary Counsel.

61. Over the course of approximately three hours, Respondent uploaded some, but not all, of her financial records to the court via Box.com.

62. Because Respondent was unable to produce all the records, the contempt hearing was continued again to December 10, 2021 at 12:00 PM.

63. At the conclusion of the November 18, 2021 hearing, and by order dated November 19, 2021, the court ordered Respondent, by November 19, 2021, (a) to submit the outstanding financial records to the court via email or Box.com, (b) to send to the court via FedEx a paper copy of “**all documents**” responsive to the subpoena, including the outstanding financial records, and (c) to provide the court a copy or photograph of her FedEx receipt. The court emailed its order to Respondent on November 19, 2021.

64. Respondent did not comply with the court’s order and did not submit the remaining records, mail the paper copy of the documents via FedEx, or provide a copy or photograph of her FedEx receipt.

65. On December 2, 2021, Disciplinary Counsel emailed Respondent and advised her that neither Disciplinary Counsel nor the court had received any documents. Disciplinary Counsel requested that she provide the documents immediately to avoid the necessity of a further hearing. That same day, Respondent replied, stating that Disciplinary Counsel should receive the documents that day. Respondent did not provide any of the documents by December 2, 2021, nor did she provide any evidence of a FedEx receipt.

66. On December 10, 2021, less than an hour before the contempt hearing, Respondent emailed Disciplinary Counsel and Judge Cordero's chambers an "Emergency Motion for Continuance" due to a "medical emergency."

67. On December 10, 2021, the court held a fifth hearing. Respondent did not appear. The Court continued the matter to December 16, 2021.

68. On December 16, 2021, the court held a sixth hearing. Judge Cordero asked Respondent to explain her medical emergency. Respondent claimed that she had been assaulted, but refused to provide additional information, claiming that the "hospital records are protected" and that she could not say more than this.

69. Respondent's justification for not providing the additional information was knowingly false. There was nothing that prevented Respondent from providing the requested information to the court.

70. Respondent did not provide the financial records or FedEx receipt before or during the December 16, 2021 hearing.

71. On December 16, 2021, the court entered an order continuing the contempt hearing to January 27, 2022, at 10:00 AM. It ordered Respondent to provide the remaining documents by the time of the hearing and to do so via Box.com. The court emailed a copy of the order to Respondent on December 16, 2021.

72. On January 18, 2022, Disciplinary Counsel wrote to Respondent and requested that she provide the remaining financial records and asked her to do so promptly to avoid the necessity of a further hearing on January 27, 2022.

73. On January 25, 2022, Respondent emailed Disciplinary Counsel and attached most but not all of the financial records that she had been ordered to produce.

74. Respondent failed to upload any of the remaining documents to the court via Box.com, in knowing violation of the court's order.

75. On January 27, 2022, the court held a seventh hearing. Although Respondent did not provide the complete financial records that she had been ordered to produce, she represented that she had produced all documents in her possession that were responsive to Disciplinary Counsel's subpoena. Based on her representation, Disciplinary Counsel moved to vacate the contempt proceedings, which the court granted.

THE CHARGES

76. Respondent violated the following provisions of the District of Columbia Rules of Professional Conduct:

- a. Rule 3.3(a)(1), in that Respondent knowingly made false statements of fact to the court;

b. Rule 3.4(a), in that Respondent obstructed Disciplinary Counsel's access to evidence;

c. Rule 3.4(c), in that Respondent knowingly and repeatedly disobeyed her obligations to produce records to Disciplinary Counsel pursuant to the rules of the Court and numerous court orders;

d. Rules 8.1 (a) and (b), in that in connection with a disciplinary matter, Respondent knowingly made false statements of fact to Disciplinary Counsel and the court, and/or failed to disclose facts necessary to correct her false statements about the status of her compliance with her obligations, and/or failed to respond reasonably to Disciplinary Counsel's lawful demands for information;

e. Rule 8.4(c), in that Respondent course of conduct in responding to Disciplinary Counsel's subpoena and her representations to Disciplinary Counsel and the court involved dishonesty, fraud, deceit, or misrepresentation; and

f. Rule 8.4(d), in that Respondent engaged in conduct that seriously interfered with the administration of justice.

Respectfully submitted,

s/ *Hamilton P. Fox, III*

Hamilton P. Fox, III
Disciplinary Counsel



Ebtchaj "Eby" Kalantar
Assistant Disciplinary Counsel

OFFICE OF DISCIPLINARY COUNSEL
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(202) 638-1501

VERIFICATION

I declare on March 21, 2022, under penalty of perjury, that I believe the foregoing facts stated in the Specification of Charges and Petition are true and correct.



Ebtchaj "Eby" Kalantar
Assistant Disciplinary Counsel

**DISTRICT OF COLUMBIA COURT OF APPEALS
BOARD ON PROFESSIONAL RESPONSIBILITY**

In the Matter of

MEHAK NAVEED, ESQUIRE

Respondent

**A Member of the Bar of the
District of Columbia Court of Appeals
Bar Number: 1032942
Date of Admission: July 8, 2016**

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: **Disciplinary Docket No. 2019-D191**
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PETITION INSTITUTING FORMAL DISCIPLINARY PROCEEDINGS

A. This Petition (including the attached Specification of Charges which is made part of this Petition) notifies Respondent that disciplinary proceedings are hereby instituted pursuant to Rule XI, ' 8(c), of the District of Columbia Court of Appeals' Rules Governing the Bar (D.C. Bar R.).

B. Respondent is an attorney admitted to practice before the District of Columbia Court of Appeals on the date stated in the caption of the Specification of Charges.

C. A lawyer member of a Hearing Committee assigned by the Board on Professional Responsibility (Board) pursuant to D.C. Bar R. XI, § 4(e)(5), has approved the institution of these disciplinary proceedings.

D. **Procedures**

(1) **Referral to Hearing Committee** - When the Board receives the Petition Instituting Formal Disciplinary Proceedings, the Board shall refer it to a Hearing Committee.

(2) **Filing Answer** - Respondent must respond to the Specification of Charges by filing an answer with the Board and by serving a copy on the Office of Disciplinary Counsel within 20 days of the date of service of this Petition, unless the time is extended by the Chair of the Hearing Committee. Permission to file an answer after the 20-day period may be granted by the Chair of the Hearing Committee if the failure to file an answer was attributable to mistake, inadvertence, surprise, or excusable neglect. If a limiting date occurs on a Saturday, Sunday, or official holiday in the District of Columbia, the time for submission will be extended to the next business day. Any motion to extend the time to file an answer, and/or any other motion filed with the Board or Hearing Committee Chair, must be served on the Office of Disciplinary Counsel at the address shown on the last page of this petition.

(3) **Content of Answer** - The answer may be a denial, a statement in exculpation, or a statement in mitigation of the alleged misconduct. Any charges not answered by Respondent may be deemed established as provided

in Board Rule 7.7.

(4) **Mitigation** - Respondent has the right to present evidence in mitigation to the Hearing Committee regardless of whether the substantive allegations of the Specification of Charges are admitted or denied.

(5) **Process** - Respondent is entitled to fifteen days' notice of the time and place of hearing, to be represented by counsel, to cross-examine witnesses, and to present evidence.

E. In addition to the procedures contained in D.C. Bar R. XI, the Board has promulgated Board Rules relating to procedures and the admission of evidence which are applicable to these procedures. A copy of these rules is being provided to Respondent with a copy of this Petition.

WHEREFORE, the Office of Disciplinary Counsel requests that the Board consider whether the conduct of Respondent violated the District of Columbia Rules of Professional Conduct, and, if so, that it impose/recommend appropriate discipline.

s/ Hamilton P. Fox, III

Hamilton P. Fox, III
Disciplinary Counsel

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