



STATE OF NORTH CAROLINA BEFORE THE
WAKE COUNTY DISCIPLINARY HEARING COMMISSION
THE NORTH CAROLINA STATE BAR

THE NORTH CAROLINA STATE BAR,

Plaintiff,

v.

PATRICK M.MEGARO and
JAIME T. HALSCOTT, Attorneys,

Defendants.

ANSWER WITH AFFIRMATIVE
DEFENSES

Docket # 24 DHC 13

PATRICK M. MEGARO hereby submits this Answer to the Complaint, and states as follows:

1. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

2. Admitted to the extent that Defendant Patrick M. Megaro was admitted to the North Carolina Bar in December 2013 by comity, denied as to the remainder of the allegations contained in this Paragraph of the Complaint.

3. Admitted to the extent that Defendant Jaime T. Halscott was admitted to the Florida Bar in 2013 and was an attorney licensed to practice in the State of Florida, denied as to the remainder of the allegations contained in this Paragraph of the Complaint.

4. Admitted to the extent that Defendant Patrick M. Megaro was admitted to the North Carolina Bar in December 2013 and licensed until May 27, 2021, and that Defendant Jaime T. Halscott was licensed in the State of Florida, denied as to the remainder of the allegations contained in this Paragraph of the Complaint.

5. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

6. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

7. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

8. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

9. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

10. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

11. Denied.

12. Admitted.

13. Admitted.

14. Admitted.

15. Admitted to the extent that Halscott Megaro, P.A. entered into a representation agreement with McCollum, Brown, and Geraldine Brown Ransom, denied as to the remainder of the allegations contained in this Paragraph of the Complaint.

16. Denied.

17. Admitted.

18. Denied.

19. Admitted.

20. Admitted.

21. Admitted.

22. Admitted to the extent that a petition was filed in the North Carolina Industrial Commission that was unopposed and that McCollum and Brown were awarded the maximum statutory amount of \$750,000.00 each as compensation for the wrongful convictions, denied as to the remainder of the allegations contained in this Paragraph of the Complaint.

23. Denied.

24. Admitted to the extent that Defendant Patrick M. Megaro negotiated a settlement with at least two of the defendants in the EDNC civil case to settle McCollum and Brown's claims against those defendants for \$1 Million, denied as to the remainder of the allegations contained in this Paragraph of the Complaint.

25. Admitted.

26. Admitted.

27. Admitted.

28. Admitted.

29. Denied as worded.

30. Admitted.

31. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

32. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

33. Admitted to the extent that Halscott Megaro, P.A.'s services were terminated by McCollum and Brown's guardians at a later time, denied as to the remainder of the allegations contained in this Paragraph of the Complaint.

34. Admitted to the extent that an Amended Complaint was filed in 2019, denied as to the remainder of the allegations contained in this Paragraph of the Complaint.

35. Admitted.

36. Admitted to the extent that the DHC filed an Order of Discipline containing certain findings of fact, denied as to the remainder of the allegations contained in this Paragraph of the Complaint.

37. Admitted to the extent that the Order of Discipline is attached as Exhibit 1 to the Complaint, denied as to the remainder of the allegations contained in this Paragraph of the Complaint.

38. Admitted to the extent that the DHC filed an Order of Discipline containing certain conclusions of law, denied as to the remainder of the allegations contained in this Paragraph of the Complaint.

39. Admitted to the extent that the Order of Discipline suspended Defendant Patrick M. Megaro for a period of five years, denied as to the remainder of the allegations contained in this Paragraph of the Complaint.

40. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

41. Admitted to the extent that Defendant Jaime T. Halscott filed a lawsuit in the Ninth Judicial Circuit Court of Orange County, Florida, denied as to the remainder of the allegations contained in this Paragraph of the Complaint.

42. Admitted.

43. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

44. Denied.

45. Denied.

46. Denied.

47. Admitted.

48. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

49. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

50. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

51. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint, and Defendant Patrick M. Megaro refers all questions of law to the DHC.

52. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

53. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

54. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

55. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

56. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint.

57. Denied.

58. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint, and Defendant Patrick M. Megaro refers all questions of law to the DHC.

59. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint, and Defendant Patrick M. Megaro refers all questions of law to the DHC.

60. Denied.

61. Denied.

62. Denied.

63. Deny knowledge or information sufficient to form a belief as to the allegations contained in this Paragraph of the Complaint, and Defendant Patrick M. Megaro refers all questions of law to the DHC.

64. Denied.

**FIRST AFFIRMATIVE DEFENSE
THE COMPLAINT FAILS TO STATE A CLAIM
UPON WHICH RELIEF CAN BE GRANTED**

1. The Complaint fails to properly allege a claim upon which relief may be granted.
2. The conduct alleged in the Complaint does not make out grounds for discipline pursuant to N.C. Gen.Stat. § 84-28(b)(2), Rules 1.5(f), Rule 3.1, Rule 8.4(d), Rule 5.1(a)

**SECOND AFFIRMATIVE DEFENSE
LACHES**

3. The conduct alleged in the Complaint occurred on or about May 25, 2021.
4. The Plaintiff negligently did not commence an informal grievance until on or about January 5, 2022.
5. The Plaintiff did not serve a Letter of Notice upon the Defendant Patrick M. Megaro until May 18, 2023 – approximately two years after the alleged conduct occurred.
6. The Plaintiff did not commence this action until July 10, 2024 – more than three years after the alleged conduct occurred.
7. There was no reasonable excuse for the delay in Plaintiff asserting the claims.
8. The delay has resulted in prejudice to the Defendant Patrick M. Megaro.

WHEREFORE, Defendant Patrick M. Megaro prays that the Panel dismiss the Complaint and that the costs of this action be taxed against the Plaintiff.

Dated: August 5, 2024



PATRICK MICHAEL MEGARO
Defendant
7566 Brightwater Place
Oviedo, Florida 32765
(516) 317-6660
patrickmegaro@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on August 5, 2024, I served the foregoing via email upon the parties listed below:

Dottie Miani
dmiani@ncbar.gov

G. Patrick Murphy
Attorney for Plaintiff
pmurphy@ncbar.gov

Jaime T. Halscott
Jhalscott@appealslawgroup.com



PATRICK MICHAEL MEGARO