



The
DISCIPLINARY BOARD
of the Supreme Court of Pennsylvania

November 2025
Newsletter



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From the Chair

Last month, the Disciplinary Board released aggregate results of the [demographic](#) and [succession planning](#) data collected during the 2025-2026 Annual Attorney Registration process. This report offers insights into the Pennsylvania bar such as that nearly a quarter of PA attorneys are aged forty to forty-nine and that the gap between the number of men and women attorneys is slowly, but consistently, narrowing.

Readers can also see that [approximately fifteen percent](#) of PA attorneys have private clients but have not named an individual or law firm as his or her successor. The Board strongly feels that succession planning is integral to any legal practice and urges all attorneys to plan for the unexpected. If you do not currently have a successor to your practice, I encourage you to read the [story](#) generously shared by my colleague and former Board Vice-Chair Gretchen A. Mundorff in a 2022 issue of the PBA's *Pennsylvania Bar News*. The future is always uncertain, but there are efforts that each of us can make to protect our practice and our clients.



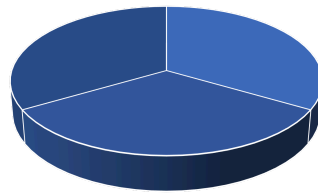
And, finally, as the Thanksgiving season nears, we recall all that we have to be grateful for and proud of as members of the Commonwealth's legal profession. On behalf of the Board, I wish a truly happy and meaningful Thanksgiving to you and your families.

With gratitude,

David S. Senoff
Board Chair

Discipline Imposed

October 2025



- Informal Admonition - 0
- Private Reprimand - 0
- Public Reprimand - 0
- Public Censure - 0
- Disability Inactive - 1
- Temporary Suspension - 0
- Probation - 0
- Suspension - 1
- Disbarment - 1

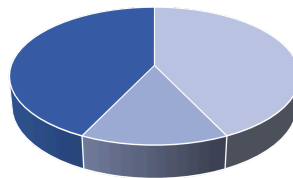
Disability Inactive
[Sally A. Frick](#)

Suspension
[Paul S. Peters, III](#)

Disbarment
[Jin-Ho Cynn](#)

Reinstatements

October 2025



- From Inactive - 3
- From Retired - 1
- From Administrative Suspension - 0
- From Disability Inactive - 0
- From Suspension - 3
- From Disbarment - 0
- Reinstatement Denied - 0

From Inactive
[Joseph Michael Duome](#)
[Stefanie Hobbs Ray](#)
[Remy Smith](#)

From Retired
[Chantel Elizabeth Hull](#)

From Suspension
[Roarke Thomas Aston](#)
[Ryan D. Breen](#)
[Albert R. Meyer](#) (to administrative suspension)

Note: The above-listed granted reinstatement matters reflect only those granted by Supreme Court Order. An attorney listed as reinstatement granted, but whose current license status does not reflect reinstatement, has yet to submit the fees necessary to finalize reinstatement.

Disciplinary Board News

Disciplinary Board Releases 2025-2026 Annual Attorney Registration Demographic and Succession Planning Data

The Disciplinary Board has released the aggregate results of demographic and succession planning data collected during the 2025-2026 Annual Attorney Registration process.

Read more about this year's [demographic results](#) and [succession planning results](#) on the Board's website.

If Retirement Is Around the Corner, What Should You Plan to Do with Your License?

Retirement tends to be a common end-of-year event. If you are considering an end to your law practice in Pennsylvania, what should you do about your license? One thing is for sure -- do not do nothing.

Your retirement from the practice of law only affects your license status if you effect a change. If you simply choose to not complete your annual registration or your CLE requirement, you will receive late penalties and ultimately be administratively suspended. Instead, pursue one of the following options:

- **Continue maintaining active status.** If you would like to maintain your ability to practice law, you should complete all requirements of an actively-licensed attorney (annual registration, CLE, etc.).
- **Assume inactive status.** While inactive status still requires annual registration, assuming such status automatically defers your CLE requirement. If you are unsure of your need to practice law in the future, consider maintaining inactive status. Please see the Board's ["Reinstatement" webpage](#) for information about reinstatement from inactive status.
- **Assume retired status.** If you believe that your need to practice law in Pennsylvania has concluded, assuming retired status will end your annual requirements (annual registration, CLE, etc.). Please see the Board's ["Reinstatement" page](#) for information about reinstatement from retired status.
- **Assume emeritus status.** After assuming retired status, an attorney may request to assume emeritus status. Emeritus status allows a retired attorney to provide pro bono services to eligible Legal Aid Organizations. For more information, please see the FAQs regarding emeritus status and the Board's ["Pro Bono" page](#).

Visit the Board's ["Forms" page](#) to find appropriate forms to request the above status changes and, as always, make sure that your [contact information](#) is always up to date.

Rules

Supreme Court Modifies Conservatorship Rules

By [Order](#) dated October 7, 2025, the Supreme Court of Pennsylvania adopted a set of amendments to the Pennsylvania Rules of Disciplinary Enforcement regarding the appointment of conservators for suspended, disabled, deceased, or otherwise absent attorneys.

Most of the [amendments](#) to Rules 321 through 328 simply add titles to describe the content of each section. Some substantive changes to the rules are incorporated into the amendments.

[Rule 321\(d\)](#) is amended to add language stating that the court appointing a conservator may adopt, as its findings of fact and statement of grounds, some or all of the allegations of the application. If so, the court must attach the application to the appointing order.

[Rule 322\(b\)](#), regarding publication of notice of the conservatorship to inactive and old cases, is amended to specify that the notice must, at a minimum, appear on one day in a newspaper of general circulation and the legal journal in the county in which the absent attorney maintained a principal office.

[Rule 322\(d\)](#), dealing with representation of clients and referral to other counsel, is amended. The conservator and members of the conservator's firm remain prohibited from representing clients of the absent attorney, but the disqualification only applies until the termination of the conservatorship, not for three years. With the consent of the client, the conservator may now refer a client's matter to a lawyer not disqualified under this section.

Amendments to [Rule 325](#), regarding the duration of the conservatorship, now allow the conservator to apply for a nine-month extension of the conservatorship, up from six. Additional extensions of up to six months may also be granted. These extensions must be supported by findings of fact although the requirement of extraordinary circumstances is removed.

The amendments are effective in thirty days, or as of November 6, 2025.

Upcoming Public Proceedings

We encourage you to observe our public disciplinary and reinstatement hearings, oral arguments, and public reprimands on the [Board's YouTube channel](#). You can also view "Upcoming Public Proceedings" at the bottom of the Board's [home page](#).

Scheduled proceedings begin at 9:30 am unless otherwise noted.

<i>December</i>		
December 3	Mikel Peter Eggert	Reinstatement Hearing
December 4	Edward James Kaushas, 2 nd	Disciplinary Hearing
December 9-11	Ryan A. Mergl (<i>cont.</i>)	Disciplinary Hearing
December 16, 30	Jesse J. White	Reinstatement Hearing
<i>January</i>		
January 5-6	Ronnie Louis Creazzo	Disciplinary Hearing
January 7	Amy Lee Thomas	Disciplinary Hearing
January 28-29	Dustin William Cole	Disciplinary Hearing
<i>February</i>		
February 3	Albert R. Meyer	Reinstatement Hearing
February 6	John McDanel (<i>cont.</i>)	Disciplinary Hearing
February 23-24	Jeffrey Larkin Wertz	Disciplinary Hearing
<i>March</i>		
March 4-5	Ronald J. Bua	Disciplinary Hearing
<i>To Be Scheduled</i>		
Kelton Merrill Burgess - Public Reprimand		
Shaka Mzee Johnson - Public Reprimand		
Ian James Musselman - Public Reprimand		
Bruce K. Warren, Jr. - Disciplinary Hearing		

Articles of Interest

Black Screen Doesn't Justify Blue Language: Lawyer Found in Contempt for Zoom Slur Against Judge

A Michigan lawyer found out the hard way that, just because your screen goes black in a Zoom session, it doesn't mean you're free to insult the judge.

Michigan lawyer Marshall Tauber was participating by Zoom in a court hearing before Judge Yasmine Poles on his client's behalf via a Zoom linkup in his car. The hearing ended with the judge denying the relief sought by Tauber's client. Tauber was recorded saying, "Thank you, your Honor ..." followed seconds later by a [sexist slur](#). He then logged off the conference call.

After ordering a transcript, Judge Poles found Tauber in direct contempt of court and fined him \$7,500. She commented, "[The comment] does not fairly roll off my tongue as easily as it does [appellant's] ... That is, wow."

On appeal, Tauber's counsel argued that Tauber was technically inept and thought he was disconnected from the Zoom call when he turned off the engine of his car and the screen went black. She argued that the comment was not willful because Tauber thought no one else would hear his comment and it was expressed out of frustration. The [Michigan Court of Appeals](#) rejected

these arguments. The Court found that whatever Tauber's intent, the statement was recorded on the transcript and was thus made in court, shocking the judge, court staff who heard it, and even Tauber's client. The Court stated, "The willful disregard consists of a statement that tends to impair the court's authority or impedes its functioning. ... Demeaning or belittling the trial court, particularly in front of a client, erodes the public's confidence in the judicial system." The imposition of the fine was upheld.

Tauber has announced his intention to [appeal](#) the matter to the Michigan Supreme Court, arguing that he should have received a hearing on the contempt charge and that reasonable doubt exists as to whether his remark was directed at the Courts.

Perhaps the incident is also a cautionary tale about this wisdom of attending online hearings in one's car.

California Supreme Court Rejects Proposal to Expunge Disciplinary Records

The Supreme Court of California, in a brief [Order](#), has rejected a [proposal](#) of the California State Bar for a one-time expungement of discipline other than disbarment from a licensee's public record of discipline after eight years.

In a separate [Order](#), the Court also rejected a State Bar proposal that would have significantly reduced the monetary sanctions imposed on disciplined attorneys. The proposal sought the Court's approval to lower fines for disbarment from \$5,000 to \$1,000, and to reduce to zero the existing \$2,500 sanction for an actual suspension and the \$1,000 sanction for a resignation with charges pending. It did approve changes in the way disciplined attorneys could pay the sanctions.

A [press release](#) from the Supreme Court of California announced the decisions without elaborating on the Court's reasoning.

ABA Formal Opinion Addresses Lawyer's Duties When Clients Commit Crimes Against the Lawyer

The ABA's Standing Committee on Ethics and Professional Responsibility has issued [Formal Opinion No. 515](#) which discusses [when a lawyer has discretion to report a crime](#) committed by a client against the lawyer or against someone associated with or related to the lawyer.

The Opinion begins by noting hypothetical situations where a client might commit a crime against the lawyer or someone connected to the lawyer. These include:

- Stealing from the lawyer by posing a fraudulent transaction in which a bad check is delivered to the lawyer;
- Seeking to retain the lawyer as part of a scam;
- Physically attacking the lawyer or staff while enraged at the law office; and
- Stealing property from the lawyer while in the law office.

The Opinion examines the lawyer's duties of confidentiality under Rules 1.6 (confidentiality) and 1.18 (prospective clients). It expresses the view that a person who contacts a lawyer for the purpose of defrauding the lawyer has not entered into a good-faith client-attorney relationship and that the duty of confidentiality does not apply to such relationships.

In addition, the Committee notes that Rule 1.6(b) allows the lawyer to reveal information relating to the representation to the extent the lawyer reasonably believes necessary for certain purposes. Rule 1.6(b)(1) allows the lawyer to reveal information "to the extent the lawyer reasonably believes necessary . . . to prevent reasonably certain death or substantial bodily harm." This may allow the disclosure if the lawyer has reason to believe it may prevent future injury to the lawyer or another. Rule 1.6(b)(3) allows disclosures "to prevent, mitigate or rectify substantial injury to the financial interests or property of another that is reasonably certain to result or has resulted from the client's commission of a crime or fraud in furtherance of which the client has used the lawyer's services." Rule 1.6(b)(5) permits disclosures "to establish a claim or defense on behalf of the lawyer in a controversy between the lawyer and the client," although the Committee notes that this exception would not apply to the hypotheticals it listed.

Further, the Opinion expresses the belief that there may be an implicit exception to the

confidentiality rule permitting disclosure to the extent reasonably necessary to report a crime against the lawyer, lawyer's family, or others associated with the lawyer. It states, "Occasionally, lawyers may metaphorically take a bullet for the client, but they cannot reasonably be expected to take a bullet *from* the client and to keep quiet about it." This implied exception also applies to situations where the lawyer is a witness to a client's crime against someone associated with the lawyer or related to the lawyer.

The Committee concludes that "when a client commits a crime against a lawyer or the lawyer witnesses a crime against someone associated with the lawyer or related to the lawyer, the Rule implicitly permits the lawyer to disclose information about the client's crime to the extent reasonably necessary to permit the relevant authorities to investigate and possibly prosecute the crime or to enable the lawyer to seek other services, remedy, or redress."

Note that this Opinion is advisory only. It is not binding on the Disciplinary Board of the Supreme Court of Pennsylvania or any other Court.

No, No, That's My Name: Ex-Judge Denied Attempt to Change Name to "Judge"

If you lost your title, you can't get it back by making it your name.

[John Dehen](#) served for fifteen years as a District Judge in Anoka County, Minnesota. He retired from the bench on October 10, 2025 after the Minnesota Supreme Court suspended him for multiple instances of misconduct. The Court found that he held a confidential hearing from a moving vehicle and improperly ordered an administrator to give his court reporter a raise despite a clear conflict of interest.

In August, Dehen filed a name change petition to change his legal name from "John Peter Dehen" to "Judge John Peter Dehen."

Ramsey County Judge Leonardo Castro, who is based in St. Paul, was assigned to Dehen's name change case. He would have no part in the name change and denied the petition.

Castro wrote that Dehen made his application "in bad faith and with intent to mislead." He added, "To permit a former district court judge, who has been suspended for abusing his position of authority, to regain the title he was stripped of, would make the administration of justice a practical mockery.... By using the name 'Judge,' the Applicant would be holding himself out as a judge, a position he held for fifteen years, but no longer holds."

Dehen's story is the second in this issue about a legal official who got in trouble for participating in a remote hearing from a car. Word to the wise.

Attorney Well-Being

Managing Stress This Holiday Season

Originally published in December 2023

For many, the holiday season is a time for great joy, celebration, and closeness with loved ones. However, with high expectations, emotional triggers, difficult family dynamics, financial burden, and a seeming scarcity of time, the season can also beget a troubling abundance of stress. [Lawyers Concerned for Lawyers of Pennsylvania](#) (LCL) explains, "It is common to feel the pressure of overwhelming stress, depression, and loneliness during this time of year."

A 2022 poll conducted by the American Psychiatric Association (APA) [revealed](#) that nearly a third of Americans reported anticipating feeling more stressed that holiday season than even the year prior. APA President Rebecca W. Brendel, M.D., J.D. explained, "This is a busy time of year for many people, and it's common to put a lot of expectations on ourselves during the holidays."

However, the APA [offers](#) a few methods for coping with elevated stress throughout the holiday season:

- **Practice mindfulness and meditation.** Anyone can take simple, practical steps toward protecting his or her own mental health and well-being. [Mindfulness](#) and [grounding techniques](#) help to reconnect to a feeling of stability and awareness.

Prevent burnout and say “no” when needed. It’s OK to say “no” to events and activities that cause undue stress. Focus on goal feelings for the season rather than a perfunctory checklist of undertakings. The APA offers a commonplace example: “It might be nice to make your grandmother’s cookie recipe from scratch for every holiday, but if that’s stressful for you, buy cookies at the store and celebrate.” Additionally, avoiding individuals or circumstances that have repeatedly produced mistreatment is not only ok—it’s healthy.

- **Take breaks.** Treat the holiday season as a marathon or, better yet, a relay. Take breaks and accept help from those around you.
- **Get fresh air and sunlight.** Even small doses of fresh air and sunlight help to relax and calm. Myriad studies have correlated mental health benefits with spending time in nature.
- **Keep any regularly-scheduled therapy sessions.** For those who attend therapy, keep scheduled appointments. Sessions not only boost comforting structure and routine but also can address difficult emotions tied to the season or challenging personal interactions that may arise.
- **Honor grief and loss.** The winter holidays often are tied to strong memories, and many may struggle as they mourn a lost loved one (or even an experience of the past). Many psychiatrists recommend honoring cherished memories and celebrating those who have been lost rather than suppressing feelings of grief.
- **Budget and avoid overspending.** It is no surprise that financial burden is one of the most common stressors and is often exacerbated during the holiday season. Take time to budget for gift giving, holiday meals, and special events. Focus on presence and affection and consider incorporating homemade gifts or “Secret Santa” in holiday giving.

The Mayo Clinic Health System also [suggests](#) that maintaining healthy routines (e.g., sleep, movement, and nutrition) and being realistic with yourself and others can support your mental health and well-being during this season of cheer (and sometimes drear).

The Disciplinary Board would like to remind all PA lawyers that, even during the holidays, LCL is available to support the legal community through their free and confidential services. Their confidential helpline is open twenty-four hours a day, seven days a week at (888) 999-1941.

HOW CAN STRESS BE BEST MANAGED THROUGHOUT THE HOLIDAY SEASON?



Explore the Disciplinary Board's Lawyer Well-Being Webpage

The Disciplinary Board's "[Lawyer Well-Being](#)" [webpage](#) connects Pennsylvania attorneys with pertinent resources, [articles](#), events, and CLE opportunities to better understand and support their mental health and well-being. To access the Board's "Lawyer Well-Being" page, visit padisciplinaryboard.org/for-attorneys/well-being.

LAWYER WELL-BEING

Connect to available resources to better understand and support mental health and well-being as they relate to the legal profession.



Digital resources
Informative articles
Upcoming events
CLE opportunities

Lawyers Concerned for Lawyers is a confidential and safe resource for Pennsylvania attorneys and their family members who may be struggling with their mental health or substance use. Since 1988, LCL has confidentially assisted and supported thousands of individuals who have faced a myriad of challenges (including grief, stress, anxiety, depression, eating disorders, gambling problems, problematic alcohol or prescription drug use, etc.), helping them navigate through dark and difficult times. If you or someone you know is struggling, please call us. You may save a life.



There is help, and there is hope.



LAWYERS CONCERNED FOR LAWYERS
PENNSYLVANIA

lclpa.org | 1-888-999-1941

Evaluation by a
healthcare professional
Information and literature
Peer and staff support
Assistance with interventions
Recovery meetings
Online resources and CLE

[Lawyers Concerned for Lawyers](#) is a confidential assistance program for the Pennsylvania legal community and their family members. LCL may not report information about a subject attorney back to the Disciplinary Board.

Confidential 24/7 Helpline: 1-888-999-1941

Last year, the Supreme Court of Pennsylvania adopted amendments to the Pennsylvania Rules of Disciplinary Enforcement (Pa.R.D.E.) relating to confidentiality of proceedings, providing for three exceptions to the requirement of confidentiality under [Pa.R.D.E. 402\(d\)](#). Included in these exceptions is the allowance for Disciplinary Counsel to make a referral of an attorney to [Lawyers Concerned for Lawyers of Pennsylvania](#) (LCL) and share information as part of the referral. *However*, it is crucial to note that LCL may *not* report information about a subject attorney back to the Disciplinary Board. LCL is a **confidential** assistance program for the Pennsylvania legal community and their family members.

Around the Court



Pennsylvania Courts Highlight Access to and Key Statistics on Protection from Abuse Orders

A [Protection from Abuse \(PFA\) order](#) is a "civil court order to help protect victims of domestic violence, providing relief from abuse by an intimate partner, family or household member." A PFA can mandate an abuser to have no contact with the victim or victim's children, relinquish any

weapons, and/or leave the home where the victims lives.

In 2024, over 41,000 new petitions requesting relief under the PFA Act were filed in Pennsylvania – eighty-seven percent of temporary PFAs were approved. The Unified Judicial System (UJS) recently published a new infographic bringing awareness to PFA access and statistics.

Additional information about protection orders is available [here](#). Read the full press release and access the infographic [here](#) on the UJS website.

A closer look at statewide PFA filings



What is a PFA Order?

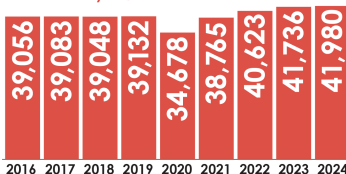
A protection from abuse (PFA) order is a civil court order that helps protect victims of domestic violence, providing relief from abuse by an intimate partner, family or household member.

In 2024:

41,980 new petitions requesting relief under the PFA Act (Title 23, Ch. 61) were filed
87% of temporary PFAs filed (valid until a final hearing) were granted

PFAs filed

In 2024 the number of PFAs filed increased by <1% from 2023.

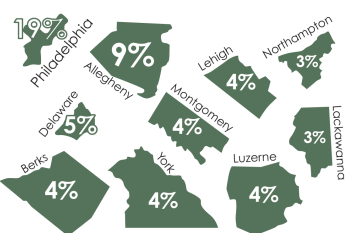


A PFA can order an abuser to:



- Have **no** contact with the victim or victim's children including: no texting, no calling, no communication via social media
- Relinquish any weapons
- Leave the home where the victim lives

Top 10 counties with highest number of new PFA cases in 2024:



Percentages given reflect the percent of total state filings.

PFA case outcomes:

	processed cases	% of total
Plaintiff did not appear in court	10,864	(26%)
Withdrawn by plaintiff	8,427	(20%)
Final order granted	7,260	(18%)
Agreement reached between parties	7,026	(17%)
Temporary order dismissed/denied	5,451	(13%)
Final order denied	1,900	(5%)
Case transferred/other dispositions	540	(1%)

Total # of PFA cases disposed in 2024: 41,468

Learn more at <http://www.pacourts.us/learn/protection-orders>

Additional data, including county-level data, are available at <http://www.pacourts.us/news-and-statistics/research-and-statistics/>.

*These data do not include Protection from Sexual Violence or Intimidation (PSVI) filings.

AOPC

From the Pennsylvania Bar Association



Thank You for Your Pro Bono Service

The Pennsylvania Bar Association (PBA) extends its heartfelt thanks to all members who participated in Free Legal Answers during October's Pro Bono Month. Pro bono service makes a meaningful difference in the lives of Pennsylvanians in need.

November Highlights from the Pennsylvania Bar Association

The PBA is rolling out a full calendar of events and initiatives this November, offering opportunities for professional development, civic engagement, and networking.

November 1st: New Member Promotion Begins

Starting November 1, new members can take advantage of a special offer: fourteen months of membership for the price of twelve. This promotion is designed to welcome new attorneys into the PBA community with extended access to benefits, CLE discounts, publications, and networking opportunities.

November 7th: Student Loan Update CLE Webcast

The Legal Academics Committee co-sponsored a webcast titled *"What's Happening with Student Loans: 2025 Legislative and Litigation Update."*

November 7th-8th: Commission on Women in the Profession Fall Retreat in Hershey

The Commission on Women in the Profession gathered for its annual retreat focused on leadership development and strategic planning for gender equity in the legal field.

November 12th-13th: Estate Law Institute in Philadelphia

The Real Property, Probate & Trust Law Section co-sponsored a two-day CLE event at the Wanamaker Building. Topics included estate planning, probate litigation, and tax strategies. Attendees earned up to 7.25 CLE credits per day.

November 20th-21st: [Committee/Section Day in Harrisburg](#)

Held at the Sheraton Harrisburg Hershey Hotel, this event brings together PBA committees and sections for collaboration, planning, and networking. The second day, the PBA's House of Delegates convenes for its fall session. Delegates will discuss policy matters and vote on resolutions shaping the future of the association.

For additional details, please visit pabar.org. The PBA hopes to see you this November!

Please note that the Disciplinary Board of the Supreme Court of Pennsylvania and the Pennsylvania Bar Association (PBA) are separate organizations. For more information about PBA, visit pabar.org or follow on Facebook, Instagram, and LinkedIn.

We Want To Hear From You...

We are always on the lookout for stories of interest relating to legal ethics, new issues in the practice of law, lawyer wellness, and funny or just plain weird stories about the legal profession. If you come across something you think might be enlightening, educational, or entertaining to our readers or social media followers, [pass it along](#). If you are our original source, there may be a hat tip in it for you.

Resources

[Pending Cases](#)

[Recent Cases](#)

[Case Research Collection](#)

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[FAQs – For Attorneys](#)

[Lawyer Well-Being](#)

[Pro Bono](#)

[Annual Report](#)

[Discipline Statistics](#)

[PA CLE Board](#)

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