Report of the Work of
The Disciplinary Board of the Supreme Court of Pennsylvania
601 Commonwealth Avenue, Suite 5600, PO Box 62625, Harrisburg, PA 17106-2625
For the Year 2014

Budget

For Fiscal Year 2013-2014, the Board's revenues totaled $9,770,427 and expenses totaled $10,286,744. After factoring in the unrealized gain on investments of $1,400,895, revenues exceeded expenditures by $884,578. The Board's invested funds experienced unrealized losses of $737,052 in 2008-2009, $288,119 in 2007-2008 and $140,000 in 2011-2012 and saw gains of $1,476,300 in 2009-2010, $1,481,533 in 2010-2011, and $987,152 in 2012-2013, respectively.

On February 28, 2014, the annual Lawyer Assessment Committee telephone conference call took place. At that time, the Board submitted a tentative Budget for Fiscal Year 2014-2015, which proposed a 5.73% increase in its Budget and projected that expenses would exceed revenues by approximately $945,923. This Budget was based on an annual fee allocation of $130.00 per attorney for the Disciplinary Board.

By Order dated May 1, 2014, the Supreme Court revised the annual fee allocations of the Disciplinary Board to provide for annual fees of $125.00 per attorney, $40.00 per attorney was allocated to the PA Lawyers Fund and $35.00 per attorney was allocated to the IOLTA Board.

General Statistics

The attorney population in Pennsylvania has increased dramatically since the Board began its operations. The number of active paid attorneys for the 1972-1973 Fiscal Year was **13,057** as compared to **64,161** active and **10,805** inactive paid attorneys as of December 31, 2014.

The efficient disposition of complaints is a matter that the Board is continually required to keep under review. During the year 2014, **4,110** new complaints were received by the ODC. **3,974** complaints were disposed of during the year, **257** of which resulted in discipline. A tabulation of the disciplinary actions taken since the beginning of the Board's operations in 1972 is set forth on the attached chart. In 2014, the Supreme Court ordered the disbarment of **46** attorneys and suspension of **42** attorneys for periods ranging up to five years (this does not include 16 attorneys who received interim temporary suspensions). Due to the fact that a number of disciplinary matters involve multiple complaints of misconduct against that attorney, the number of complaints resulting in discipline will not equal the total disciplinary actions taken in any given year.

Discipline on Consent

Effective June 11, 2005, the Supreme Court approved amendments to Rule 215, Pa.R.D.E. In July 2005, the Board established a procedure for three-member panels to review Joint Petitions for Discipline on Consent. When Joint Petitions are filed with the Board, they are assigned to three-member panels to review and either approve or deny the Joint Petitions.

When a decision is made, the Panel Chair returns the signed Recommendation page to the Board Secretary. If the Joint Petition is approved, the Secretary's office notifies the respondent-attorney of the approval and that the necessary expenses must be paid as a condition to the grant of the Petition. The respondent-attorney is given ten days in which to do so. Upon receipt of payment, the Panel's Recommendation is forwarded to the Supreme Court, if the joint recommendation is for some form of public discipline.

During the 2014 year, **24** Joint Petitions in Support of Discipline on Consent were filed with the Board. **8** of those joint petitions were filed prior to scheduled disciplinary hearings. **19** joint petitions were approved and **1** was denied. Of those approved, **2** resulted in private discipline and **17** resulted in public discipline. As of December 31, 2014, **4** of the joint petitions filed in 2014 were not yet final.

Since consent discipline was adopted in Pennsylvania in 2005, **298** Joint Petitions in Support of Discipline on Consent were filed with the Board.

Board Activities

During the year 2014, the Disciplinary Board met in person five (5) times. All of these meetings combined administrative and executive business. At its executive sessions, the Board adjudicated **24** proceedings involving formal charges. Of the 24 major adjudications, **20** were referred to the Supreme Court, together with the Board's Report and Recommendations. In addition to regularly scheduled meetings, three-member Board panels heard oral argument in **4** matters. Three-member review panels considered recommendations for summary Private Reprimands in **6** cases, and summary Public Reprimands in **7** cases. **3** respondents appeared before three-member Board panels and received private reprimands and **5** respondents received public reprimands. Finally, **1** Board Member conducted a hearing on a petition to dissolve a temporary suspension, and **3** Board Members reviewed and approved the filing of petitions for emergency temporary suspension with the Supreme Court.

On November 18, 2014, the Board convened a special telephone conference call Meeting to review the comments received in response to its Notice of Proposed Rulemaking which was published for comment, hear the recommendations of the Rules Committee with respect to changes to the proposed Rules and approve the filing of the proposed amendments to the Rules of Professional Conduct and Rules of Disciplinary Enforcement with the Supreme Court.

In May 2009, Rule 218, Pa.R.D.E. was amended to provide a new procedure for attorneys petitioning for reinstatement from inactive or retired status for more than three years. The new Rule provides that if ODC has no objection to the reinstatement and files a certification with the Board Secretary stating that after review of the petition and reasonably diligent inquiry, they have determined that there is no impediment to reinstatement and the petitioning attorney will meet his or her burden of proof under the Rule if the petition were to proceed to hearing, the petition and certification are referred to a member to the Board for review and to issue a report and recommendation in accordance with the Rule. If the assigned Board Member approves the reinstatement, the matter is forwarded to the Deputy Prothonotary of the Western District of the Supreme Court.

In 2014, Board Members reviewed and approved **90** reinstatements from attorneys on inactive status, retired status or administrative suspension for more than three years. In addition,

this new procedure cuts down the processing time on these types of reinstatements from an average of six months to about three months. The costs charged to the petitioning attorney are also drastically reduced due to the elimination of the need for a hearing and the reduced number of copies being filed with the Court.

At the request of the Board, the Chief Disciplinary Counsel, the Executive Director and the Secretary of the Board have taken steps to speed up the disposition of complaints. The Board is cognizant of the fact that complainants and respondents deserve to have cases handled in a timely manner. A number of changes in procedures and productivity have served to significantly cut down the time it takes to process a case.

Board Committee Activities

Rules Committee

During 2014, the following proposed amendments were approved:

Pa.R.D.E. 214(h) – Amended by Order dated March 4, 2014, effective April 3, 2014 to clarify that both direct and indirect criminal contempt fall under the self-reporting requirements of that Rule.

Pa.R.D.E. 219(a) and RPC 1.15(u) – Amended by Order dated May 1, 2014. The Court directed that the Rules be amended to change annual fee allocations for the 2014-2015 annual attorney registration period.

Amendments to Board Rules of Organization and Procedure – Order No. 75 adopted effective June 2, 2014 made a conforming amendment consistent with the amendments made to Pa.R.D.E. 214(h) regarding direct and indirect criminal contempt.

RPC 1.7, 1.8, 1.15, 5.7 and 5.8 and Pa.R.D.E. 208, 213, 215, 217, 218, 219 and 221 – Amended by Order dated December 30, 2014, effective February 28, 2015 to reduce loss resulting from the misappropriation of client and third party funds.

In addition to the above Rule changes, the Board published a Notice of Proposed rulemaking soliciting comments on proposed amendments to the following Rules:

RPC 1.7, 1.8, 5.7, 1.15 and Pa.R.D.E. 208, 221, 219, 213, 215, 217 and 218 (relating to reducing loss resulting from the misappropriation of client and third party funds), published for comment on September 27, 2014 – 28 comments were received.

The adverse effects of a lawyer's theft of client funds can be felt on both a micro and a macro level. Typically, the client is misled and deprived of access to needed funds. When the dishonest lawyer is in charge of investing a client's funds, the client's life savings may be lost. The common thread running through many of the misappropriation cases coming before the Board is that the client trusted his or her attorney, the attorney told the client that the client needed either to give the attorney the money outright or to establish a trust designed by the attorney to "protect" the client's assets, the attorney then raided the client's funds or appointed himself or herself as trustee to convert the entrusted funds, and no banks were used by the

attorney to help safeguard the client funds. In other instances, the attorney used forged documents to mislead a bank into believing that the client had authorized transfers of funds to the attorney. While the disciplinary system can suspend or disbar a lawyer for engaging in this type of misconduct, restitution is another matter, as all of the funds are gone and there is no insurance coverage.

In July 2014, the Board began to examine whether there was a disciplinary mechanism, short of barring attorneys from handling fiduciary funds altogether, that would prevent or at least deter large-scale defalcations. An ad hoc committee of trust and estate practitioners was formed. It consisted of former Disciplinary Board Members and Chairs, Marvin J. Rudnitsky and Louis N. Teti, as well as Attorneys Jack Meck from Eckert Seamans in Pittsburgh and Elyse Rogers from Saidis, Sullivan & Rogers in Lemoyne. Former Board Member and Chair M. David Halpern was also consulted. The experts were extremely helpful in explaining how most trust and estates cases are handled. The Committee came to a consensus that certain changes to the Rules would be beneficial. They focused on a Rule of Professional Conduct that would preclude a lawyer from brokering, selling or offering to place an investment product for a client, unless the lawyer is separately licensed to do so. They recommended the Enforcement Rules also be amended to require that attorneys list on their annual registration forms all financial institutions to which they hold client funds and have signatory authority and also provide the account information pertaining to their operating accounts. Finally, they recommended the Rules also be amended to make records more accessible to Office of Disciplinary Counsel inspection when there is evidence of misconduct involving trust accounts.

A number of changes were made to the proposed amendments after the Rules Committee reviewed all of the comments received in response to the Notice of Proposed Rulemaking.

Act 32 of 2014 – The Board was asked to consider recommending amendments to the Rules of Professional Conduct to protect children from suspected child abuse. The Rules Committee reviewed Act 32 of 2014 and in July 2014, reported to the Board that it had a number of reservations about amending the Rules of Professional Conduct to conform to the legislation due to the impact it would have on the lawyer/client relationship . They found the Act was too ambiguous and the Committee recommended the Board do nothing to amend the Rules. The Rules Committee felt current Comment 18 to Rule 1.6 appears to cover this situation. It states "Other law may require that a lawyer disclose information about a client. Whether such a law supersedes Rule 1.6 is a question of law beyond the scope of these Rules. When disclosure of information relating to the representation appears to be required by other law, the lawyer must discuss the matter with the client to the extent required by Rule 1.4". This recommendation was shared with the Court.

Finance & Pension Committee

The Finance & Pension Committee reviewed and approved the proposed Budget for Fiscal Year 2014-2015. The Committee also reviewed the audit performed by the Board's auditors, KPMG LLP.

In March 2014, the Committee recommended and the Board approved the assessment of an automatic late payment penalty of $150.00 on attorneys who failed to complete registration by July 31. A second, non-waivable late payment penalty of $150.00 was recommended and approved by the Board to be added to the delinquent account of any attorney who failed to complete registration by August 31st.

At its Meeting in May 2014, the Board approved the distribution of a newly drafted employee policy manual to all staff. Prior to this time, policies would be disseminated to staff when they were amended but there was no comprehensive manual. The Board's policies were compared to the AOPC policies, adjustments were made and the draft manual was reviewed by the Board's outside Counsel to ensure it complies with all State and Federal laws regarding employment.

At its meeting in May 2014, the Board also approved the recommendations of Board Member Douglas Leonard to establish an ad hoc committee on Succession Planning to begin planning for the transition of some key players in the Executive Office and the Office of Disciplinary Counsel. The Board appointed a Committee consisting of Board Members and staff to begin working on this project. Mr. Leonard will Chair this Committee.

In July 2003, the Board was notified by the Supreme Court of the establishment of the Investment Advisory Board ("IAB"). The IAB was established to assist the Supreme Court in its oversight and consolidation of investment portfolios that would enhance returns and reduce investment fees. The IAB developed an investment policy and selected an investment firm to implement the policy. In September 2005, the Supreme Court adopted Rules setting forth responsibilities and procedures to ensure that each participating Board's normal operations would not be adversely affected by this new investment structure. Effective July 1, 2005, the Administrative Office of the Supreme Court began investing the Board's funds in the consolidated account through PNC Advisors. The IAB consists of one representative from each of the participating Boards and four members appointed by the Supreme Court. The Court Administrator of Pennsylvania serves in an *ex officio* and tie-breaking capacity. The four Court-affiliated Boards involved are the Disciplinary Board, the PA Lawyers Fund for Client Security Board, the PA Continuing Legal Education Board, and the Pennsylvania Board of Law Examiners.

Board Member David E. Schwager is currently the Board's representative on the IAB.

Education Committee

The Education Committee designed the program for the Board's Educational Meeting in July 2014. The first topic was "The State of Ethics Education". The guest speaker was Professor Mark Yochum from Duquesne University School of Law. Professor Yochum was very informative and was well received by the Board. The second topic was "Legal Education

Advisory Committee". The Board discussed outreach to PA Law Schools and the establishment of a Legal Education Advisory Committee that would consist of designated representatives from the respective law schools. The role of the Committee would be to exchange information on ways to better educate students about the disciplinary system and share information with the law schools about changes to the Rules, procedures and other information that would be of interest to students and faculty. The Board also discussed establishing an Outstanding Ethics Award to be presented by the Board to one outstanding student at each of the Law School clinical programs. The last topic was Continuity of Discipline and consisted of three previously decided cases from PA to test members on the type of discipline that would be recommended today. The Board was very lucky to have Justice Todd participate in the program.

The Pennsylvania Bar Association's Solo & Small Firm section asked that some members of the Board make a presentation at their annual meeting in July 2014. Board Chair, R. Burke McLemore, Jr., Vice-Chair Stephan K. Todd and Member David E. Schwager did a one hour presentation which focused on cases involving solo practitioners and the areas of practice where most of the violations occurred.

The Education Committee also designed the program used at the Training Session & Refresher Course for all Hearing Committee Members held on October 24, 2014 in Hershey. A total of **116** Hearing Committee Members and Board Members attended the program. The program started with Chief Justice Ronald D. Castille providing some opening remarks and Justice J. Michael Eakin speaking on the role the Supreme Court has in the disciplinary process. Members also heard the story of Laurie J. Besden's journey through law school, addiction and recovery. She currently serves as the Deputy Executive Director of Lawyers Concerned for Lawyers.

The program then broke into two concurrent workshops. New members received information on the disciplinary system, their role in the process, how Hearing Committees are assigned and hearings are scheduled, and a review of the types of discipline and how discipline is determined. At the same time, panels of Senior and Experienced Hearing Committee Members provided tips on chairing hearing committees, presiding at hearings on subpoena issues, conducting prehearing conferences, and issues and questions other members had relating to their duties. Board Members and staff presented most of the program, along with guest speaker Ellen C. Brotman, who brought the perspective from respondents' counsel.

Communications Committee

The role of the Communications Committee is to provide oversight to the Board's Website, increase visibility, and to explore ways of improving communications with the general public, attorneys, law students and others.

In July 2008, the Board retained Suasion as its communications firm. Their primary function is to provide support for the Board's website and distribute the monthly Attorney E-Newsletter. As of December 31, 2014, there were 66,951 subscribers to the monthly Attorney E-Newsletter.

During 2014, the Communications Committee met monthly to review the statistics on the number of subscribers to the Attorney E-Newsletter, and the Board's Twitter page @DboardPa,

which now has 500 followers. In 2014, the Board launched a mobile app for use on android phones and iPhones.

In 2014, Suasion also updated a number of items and Rules on the website at the request of staff. They wrote and distributed press releases and articles concerning online attorney registration, appointments and reappointments to the Disciplinary Board and the new distribution of press releases on disbarments and suspensions. They also drafted and distributed two email blasts to attorneys concerning deadlines for attorney registration and how to do online registration.

In the Spring of 2014, the Communications Committee began discussions on ways to better communications with law schools and their students. They solicited feedback from students regarding appeal of the logo "Keep Calm and Follow the Rules" and after receiving positive reactions, began strategizing a campaign of posters and emails to get the word out about the Board and what it does. The Committee also developed the protocol for the Outstanding Ethics Award and hopes to get the Legal Education Advisory Committee up and running in 2015.

Disciplinary Board Website

On June 25, 2003, the Disciplinary Board launched its Website at www.padisciplinaryboard.org. In 2005, the Board purchased two additional domain names (www.padboard.org and www.padb.us) in an effort to provide easier access to the site.

In June 2006, the Board launched its redesigned website with the goal of making it more consumer friendly. The site features an attorney section, a consumer section, and an attorney look up section. The attorney section provides forms for registration and reinstatement, information on registration and reinstatement procedures, options to look up attorneys, frequently asked questions, current copies of the Rules, and other attorney related information. The consumer section allows consumers to look up attorneys, explains the process for filing a complaint, provides downloadable copies of the complaint form and informational brochures, and provides information to better understand how the disciplinary system works. The attorney look up section, which can be accessed directly from the Home page allows users to easily search registered Pennsylvania attorneys to verify public address information, the attorney's current status, date of admission, a history of public discipline, if any, and whether there are any public proceedings pending against that attorney.

In 2007, the Board added a new component to its website to assure the public is informed of recent Supreme Court actions taken against attorneys. The new Recent Supreme Court Action tab is on the Board's Home page, and one click on the tab takes users to a Table which lists the discipline against attorneys during the last 60 days. The table contains the attorney's name, the date of the order, action taken, and, where available, a link to the Board's report or joint petition for discipline on consent. Within 24 business hours after a Supreme Court Order is entered, the case will be added to the table. Users can also access discipline going back to 2011, and these tables can easily be sorted by date, attorney last name, type of action taken, the county where the attorney is located and by attorney ID number.

In the Fall of 2012, the Board launched a new mobile-friendly website. The new website is now more accessible on various devices, including PCs, smartphones, IPads and more. The information and content has not changed, but how the information appears will be different based on the device being used. The Look Up Attorney section was upgraded to include a "Show/Hide Column" which allows users to choose which specific details they want or don't want to see regarding that attorney. This is especially helpful when trying to access the information on a smaller device, such as a smartphone.

During the 2014 year, the top pages visited were: Look up Attorney, Attorney Home Page, Recent Supreme Court Actions, Online Address Change and Consumers Home Page. 73% of the visits were made from Pennsylvania, with the top five locations being Philadelphia, Pittsburgh, Harrisburg, Norristown and West Chester. 51.04% of the traffic used search terms to find the site, 6.07% came from referral sites (such as the PBA and PA Board of Law Examiners), and 42.63% was direct traffic where the user typed in the Board's web address into a browser.

Hearings and Hearing Committees

In October 2004, the hearing committee organization was re-structured to give the Board the ability to assign formal hearings to committees within a disciplinary district using all available committee members. Members were ranked based on their experience. In addition to reorganizing the Hearing Committees, the Board also made changes in the procedures for scheduling hearings. At the same time the three Committee members are selected, they are contacted by telephone and prehearing and hearing dates are set. If one of the members is not available, the staff in the Secretary's Office can call another member to find someone available on the dates selected. The Notices of Prehearing and Hearing are sent to the parties and the Committee at the same time the assignment is made. This has eliminated the undue delays in scheduling the Board experienced in the past.

New procedures were put in place to try to eliminate overdue Hearing Committee Reports. After the briefing schedule has passed, the members of the Hearing Committee are sent a reminder letter by the Board Secretary giving them the due date for the Report. In addition, a week or two before the Report is due, Counsel to the Board places a reminder phone call or sends an email to the Committee Chair reminding him or her of the upcoming due date and offering assistance, if needed. Since the establishment of this new procedure, there have been very few Board Meetings where any Hearing Committee Reports were reported as overdue.

In August 2005, the Board launched a page on its Website exclusively for the use of Hearing Committee Members and Board Members. This section offers sample hearing committee reports, orders and other documents, Word templates for the preparation of all types of committee reports, as well as travel expense and other forms. The section also includes a research page which contains links to published Board Reports, a bank of Supreme Court Opinions and current copies of the Rules.

As of December 31, 2014, there are **145** Hearing Committee Members, consisting of **58** Senior members, **48** Experienced members and **39** New members appointed by the Disciplinary Board who serve on a pro bono basis to conduct hearings.

Other Highlights in 2014

Document Management & Case Management Systems – In January 2014, the Board's design team began work on creating the custom software needed to implement a new case management system so that it can be fully integrated with the DocuWare software currently being used for document management in the District Offices as well as the Board's Executive Office. The Board contracted with a software development firm and anticipates that the new system will be up and running before the end the first quarter in 2015.

AOPC IT Staff Support – In September 2014, the Board entered into a memo of understanding with the Supreme Court to provide IT support to the Board offices in an effort to cut costs, decrease downtimes and streamline support for all offices. The Board also budgeted to upgrade the servers and workstations used in the various offices.

Press Releases and Changes in Notices – In July, the Board agreed to change the notices published in the daily paper and legal journal when attorneys are suspended or disbarred to include the attorney's ID number as well as his or her last public address of record. This was done in an effort to eliminate confusion when attorneys with similar names reside in the same county. In addition, the Board received permission from the Supreme Court to begin issuing regional press releases when attorneys are suspended or disbarred to expand the coverage beyond the county where the attorneys maintained their offices.

The AOPC Communications Office graciously agreed to distribute the press releases for the Board since they have an extensive list of media contacts and that list is constantly changing.

Costs of Publishing Notices – Also in July, the Board approved an amendment to the Rules that would require attorneys reimburse the Board when notices of suspension, disbarment or reinstatement hearings are published in the daily paper and legal journal in accordance with the Rules.

Change in CLE Courses Required for Reinstatement – In October 2014, the Board approved an amendment to the Schedule of courses required for reinstatement to increase the online hours from 12 to 16, effective January 1, 2015. This conforms to the change in the PA CLE Rules that takes effect starting with compliance periods ending in 2015.

National Meetings – In February 2014, Board Members, R. Burke McLemore, Jr., Douglas W. Leonard and Tracey McCants Lewis, Board Secretary Elaine Bixler and Assistant Secretary, Marcee Sloan, attended the Eleventh Annual Meeting of the National Council of Lawyer Disciplinary Boards (NCLDB) in Chicago, Illinois. Board Member Leonard also did a presentation on Motivational Drivers during that Meeting.

THE DISCIPLINARY BOARD OF THE SUPREME COURT OF PENNSYLVANIA
Calendar Years

Calendar Years	Informal Admon.	Private Reprimand	Public Reprimand	Proba-tion	Public Censure	Suspend	Disbar	Grant Rein.	Deny Rein.	Year-end Totals
1973	37	0		0	0	3	3	1	1	**45**
1974	55	7		0	2	12	4	2	2	**84**
1975	95	8		0	5	12	6	2	2	**130**
1976	81	9		0	8	8	5	3	0	**114**
1977	96	7		2	10	10	13	3	0	**141**
1978	102	14		1	7	13	6	4	3	**150**
1979	121	5		0	6	17	12	2	1	**164**
1980	98	5		0	1	8	12	6	5	**135**
1981	113	4		0	1	17	21	42	4	**202**
1982	156	6		0	2	12	33	21	0	**230**
1983	137	9		0	6	7	24	22	0	**205**
1984	125	21		0	1	7	21	25	2	**202**
1985	123	19		0	3	16	16	21	0	**198**
1986	101	27		0	2	5	29	17	2	**183**
1987	110	17		0	3	10	23	24	1	**188**
1988	106	25		0	0	17	32	34	1	**215**
1989	123	31		0	2	17	18	27	0	**218**
1990	98	26		1	1	18	26	34	1	**205**
1991	115	46		1	4	10	27	35	0	**238**
1992	82	42		7	1	20	38	27	1	**218**
1993	85	30		5	0	12	20	29	1	**182**
1994	75	41		5	1	23	32	24	0	**201**
1995	74	48		7	6	26	35	44	1	**241**
1996	70	31		3	3	37	41	31	0	**216**
1997	106	46		8	3	33	40	35	2	**273**
1998	88	43		5	7	24	33	33	1	**234**
1999	48	26		7	4	23	29	45	4	**186**
2000	45	29		3	0	30	32	35	2	**176**
2001	40	35		10	2	27	31	55	3	**203**
2002	54	32		8	2	29	42	64	4	**235**
2003	58	36		8	1	31	38	58	4	**234**
2004	106	34		20	1	38	37	75	2	**313**
2005	109	26		24	2	51	37	72	1	**322**
2006	77	22		11	4	65	39	93	1	**312**
2007	85	16		6	3	48	25	64	2	**249**
2008	90	25		15	5	45	38	82	1	**301**
2009	62	23		9	4	40	29	84	3	**254**
2010	55	16		8	2	34	45	106	1	**267**
2011	75	19		15	3	49	32	105	2	**300**
2012	56	15	9	11	5	50	36	88	2	**272**
2013	48	13	9	8	1	32	40	80	2	**233**
2014	76	6	8	10	0	42[1]	46[2]	107[3]	1[4]	**296**
Total	**3,656**	**940**	**26**	**218**	**124**	**1,028**	**1,146**	**1,761**	**66**	**8,965**

[1] This figure includes **14** suspensions on consent (Rule 215 Pa.R.D.E.) but <u>does not</u> include **12** temporary suspensions (Rule 214 Pa.R.D.E.) and **4** temporary suspensions (Rule 208(f) Pa.R.D.E.)

[2] This figure includes **28** disbarments on consent (Rule 215 Pa.R.D.E.)

[3] This figure includes **91** reinstatements to active status after being inactive, retired or administratively suspended three or more years, **14** reinstatements after having been suspended and **2** reinstatements after having been disbarred.

[4] This figure includes **1** reinstatement denied after being disbarred.