

June 2024 Newsletter









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From the Chair

In May of 2018, the Supreme Court of Pennsylvania adopted Pennsylvania Rule of Disciplinary Enforcement 403, creating a special emeritus status that allows retired attorneys to volunteer their expertise to the provision of pro bono legal services. Volunteer emeritus attorneys help to narrow the gap between the need for and the availability of free legal services through their work with legal aid and other nonprofit programs throughout the Commonwealth. Emeritus attorneys need not obtain their own professional liability insurance; all emeritus attorneys are covered by their approved eligible legal aid organization. Emeritus attorneys also have



reduced <u>Continuing Legal Education (CLE) requirements</u>. Each year since the program's inception, several attorneys moving to retired status through <u>Annual Attorney Registration</u> have simultaneously applied for the Disciplinary Board's emeritus status program. Once again, the Board is proud to welcome additional lawyers into the program and extends its gratitude to all furthering access to justice in through their service as emeritus attorneys.

Every year, all active and inactive status attorneys are obligated under <u>Pa.R.D.E. 219</u> to complete <u>Annual Registration</u> through the Unified Judicial System Web Portal. In recognition of the unique experiences and challenges facing some attorneys, a May 2022 Supreme Court <u>Order</u> amending Rule 219 permits attorneys to apply for a <u>waiver</u> of the annual fee under the condition of extreme financial hardship. In order to be eligible, an attorney must be on active status, and his or her income must be equal to or below the <u>federal poverty guideline</u>. All waiver applications for the 2024-2025 registration period are due by July 1, 2024.

Prior to the assessment of last year's second late fee, over 98% of PA attorneys had successfully completed their registration responsibility. My fellow Board Members and I implore each attorney to complete registration obligations by the July 1st deadline to avoid the imposition of late payment penalties or administrative suspension of his or her license to practice law.

Wishing you a safe and restful summer,

Annual Attorney Registration

2024-2025 Registration Due July 1st

The online <u>2024-2025 online registration</u> is open in the Unified Judicial System Web Portal. Attorneys must register by **July 1, 2024**. <u>Exemptions</u> from the requirement of *online* filing are available for good cause but must be requested in writing.

Registration fees are \$275 for active status and \$100 for inactive status; there is no fee for attorneys assuming retired status. Attorneys may choose to pay online with a credit card or to mail a check and printed voucher. Vouchers *cannot* be created after the initial July 1st deadline.

The first \$200 late fee is assessed after July 16th, and the second \$200 late fee is assessed after August 1st. These late payment penalties are imposed automatically and are not waivable by the staff or Board. An additional fee of \$25 will be assessed in the event of any returned payment. Failure to complete registration by August 1st may be deemed a request for transfer to administrative suspension under Pa. R.D.E. 219(f).

Payment Note: If you choose to "Pay Online" with a credit/debit card, it is recommended to manually enter your information on the payment screens and not allow your browser to autopopulate your information.

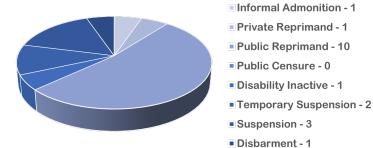
As always, please ensure that your contact information is up-to-date with the Board.

In cases of extreme financial hardship, a <u>waiver</u> of the annual fee may be granted. Eligible attorneys must be registering for active status and have an adjusted gross income less than or equal to the federal poverty guidelines for the applicable household size.



Discipline Imposed

May 2024



Public Reprimand

Jonathan C. Dunsmoor

Brian Christopher Eves

Emeka Igwe

Richard P. Kimmins

Timothy M. Kolman

Ivan Erik Lee

David Edward Mulock

John Patrick Sanderson, III

Scott Richard Sanderson

Andrew B. Shaw

Disability Inactive

James A. Katz, Jr.

Temporary Suspension

Roarke Thomas Aston

Andrew Scott Ziegler

Suspension

Daniel J. McCauley, III

William J. Weiss

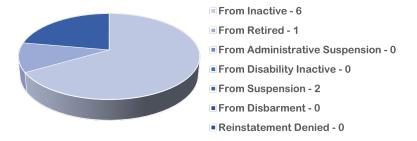
A.B. Zolfaghari Monfared

Disbarment

Jonathan Edward Olivetti

Reinstatements

May 2024



From Inactive

Lauren V. Amjed
Frank Louis DeFazio
Alison Kehner
Kristina Elizabeth Mirtti
Katrina Christensen Rogachevsky
Gregory Wilson

From Retired

Michael Kevin Williams

From Suspension
Suzanne Spencer Abel
William E. Gericke

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.

Upcoming Public Proceedings

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

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

June		
June 20	Stephen William Dotts	Disciplinary Hearing
July		
July 1 July 2	Christopher Nicholas Urbano	Disciplinary Hearing
July 29 July 30 July 31	Patrick C. Carey	Disciplinary Hearing
September		
September 5	Daniel Michael Dixon	Reinstatement Hearing
September 16 September 18	Daryl Alan Yount	Disciplinary Hearing
October		
October 8 October 9	Steven Ostroff	Disciplinary Hearing
To Be Scheduled		
Gordon Sander Brown - Public Reprimand		
Deon Basheer Browning - Public Reprimand		
Jessica Michelle Dean - Public Reprimand		
Paul M. Goltz - Public Reprimand		
Carlos A. Martir, Jr Public Reprimand		
James S. Tupitza - Public Reprimand		

Articles of Interest

Attorney Suspended for Attending Conferences While on Suspension

A Philadelphia attorney received a five-year suspension after he continued to appear at court conferences while his license was suspended.

William J. Weiss was suspended for one year and one day by Order of the Supreme Court dated March 5, 2019, effective April 5, 2019. This was his third suspension. Although he received notice of the order imposing the suspension, he appeared at and actively participated in case management conferences in two cases. In both instances, he appeared when counsel of record was unable to attend on behalf of clients represented by the law firm where he was employed. He also appeared at a settlement conference in a case in which he had entered an appearance prior to his suspension, accompanying an attorney on active status who introduced Weiss as his assistant. The Disciplinary Board found that he improperly attended the latter event even though he did not actively participate and was introduced as a legal assistant.

The Board found that Weiss violated four Rules of Professional Conduct and six Rules of Disciplinary Enforcement. In addition to his misconduct, the Board found several aggravating

factors in addition to his prior discipline. He evaded service of the Petition for Discipline; failed to attend the prehearing conference or comply with the prehearing order; was combative, rude, and disrespectful at the hearing; refused to acknowledge any wrongdoing; showed no remorse; and continued to present himself as a practicing attorney on social media. The Board disagreed with a Hearing Committee finding that his response to Disciplinary Counsel's initial letter of inquiry was a mitigating factor. The Board found that he had engaged in similar misconduct in response to his earlier suspension and identified him as a recidivist offender who had not learned from disciplinary experience.

The Disciplinary Board recommended a five-year suspension, the maximum length of suspension available under the rules. The Supreme Court accepted this recommendation and suspended Weiss for a period of five years.

How to Steal (Twelve) Million

Not all fare as well as Audrey Hepburn and Peter O'Toole.

A former New York lawyer <u>faces prison time</u> – again. Douglas Raymond Arnsten was sentenced to jail time in 2012 after pleading guilty to grand larceny and scheme to defraud, admitting that he stole over ten million dollars from clients. According to prosecutors, during his tenure as an associate at Crowell & Moring law firm, Arnsten funneled money from escrow funds into accounts that he controlled. He <u>spent</u> the stolen money on sporting events, expensive meals, strip clubs, various investments, and the purchase of businesses. He <u>was disbarred</u> in 2013 and served five years in prison.

Last month, Arnsten once again <u>was sentenced</u> to prison. In December, he pleaded guilty to conspiracy to commit wire fraud, having pilfered approximately \$1.4 million in COVID-19 pandemic relief funds.

Throughout the summer of 2020, Arntsen engineered a scheme to submit fraudulent loan applications to the Small Business Administration through its Economic Injury Disaster Loan program which, in 2020, was expanded to "provide funding to help small businesses recover from the economic impacts of the COVID-19 pandemic". He recruited thirteen others to submit fraudulent loan applications claiming they owned small businesses with which they had no relation. Prosecutors stressed his influence over these individuals who believed him to be an active lawyer and legal expert.

Manhattan U.S. Attorney Damian Williams dubbed Arnsten a "recidivist fraudster" while U.S. District Judge P. Kevin Castel made clear that Arntsen had "not gotten the message" to not commit further crimes.

Pennsylvania Bar Association and Philadelphia Bar Association Issue Joint Formal Opinion Regarding Artificial Intelligence

The benefits of artificial intelligence (AI) in the practice of law are undeniable, and its prevalence across industries is growing rapidly. However, the application of AI has also presented ethical issues for the legal community. On May 22nd, the Pennsylvania Bar Association and Philadelphia Bar Association issued a <u>Joint Formal Opinion</u> on the use of AI.

In the Opinion, the two associations define pertinent terms, illustrate the challenges of Al

"hallucinations" and "false answers", explore the implications of Pennsylvania Rule of Professional Conduct, lay out guidelines for the ethical usage of AI, and expound guidance within other jurisdictions around the United States.

Read the full Joint Opinion issued by the PBA and Philadelphia Bar Association here. Note that this Opinion "is advisory only and is not binding on the Disciplinary Board of the Supreme Court of Pennsylvania or any other Court. This opinion carries only such weight as an appropriate reviewing authority may choose to give it."

ABA Ethics Committee Is Adamant: Don't Post Client Information on Listservs

Among the technological innovations of this time is the development of listservs, internet groups where lawyers can exchange information to enhance their practices (or for other purposes). Many times, lawyers will post inquiries on listservs, seeking information or advice on some area of practice. Some may be tempted to post client stories or issues in anonymous terms to seek advice, suggestions, or reactions. The ABA's Standing Committee on Ethics and Professional Responsibility has one word of advice on that subject: don't.

<u>Formal Opinion 511</u>, published by the Standing Committee on May 8, 2024, addresses what lawyers may post on listservs. The opinion focuses on the requirements of <u>ABA Model Rule 1.6</u> [<u>Pennsylvania version</u>], dealing with confidentiality of client information.

The Committee notes that Model Rule 1.6 "restricts communications that could reasonably lead to the discovery of information relating to the representation". It adds that, in the absence of informed client consent, lawyers are barred from disclosing such information even in anonymized, hypothetical, or in abstracted form if it is reasonably likely that someone might ascertain the client's identity or the situation involved.

The Opinion examines whether lawyers have implied authorization to reveal information relating to the representation of a client to a wider group of lawyers by posting an inquiry or comment on a listserv and concludes they are not. It states, "a lawyer must have the client's informed consent to post a hypothetical to a listserv if, under the circumstances, the posted question could reasonably lead to the discovery of information relating to the representation because there is a reasonable likelihood that the reader will be able to ascertain the identity of the client or the situation involved." The same reasoning applies to replies to inquiries, to attempts to build one's practice through networking, and to "war stories."

In some circumstances, such as when the inquiry is so general that it cannot be identified with any particular client, a lawyer may post general questions or hypotheticals if there is no reasonable possibility the inquiry could be identified with any particular client. The Committee adds, "The more unusual the situation, however, the greater the risk that the client can be identified, and therefore the greater the care that must be taken to avoid inadvertently disclosing client information."

The Committee notes that some circumstances may pose an elevated risk of identification of the client from circumstances, such as where the lawyer represents a single client (e.g., as in-house counsel or government lawyer), the matter has received such wide media attention that the facts may be recognizable, or the message is posted to an online community so small and connected that members may be likely to recognize information the general legal population would not.

The Committee takes note that resources such as listservs serve a positive role for lawyers in maintaining their competence and providing effective service to clients. The Committee cautions,

however, that lawyers participating in them should always be aware of and guard against the risk that postings may result in the unintentional disclosure of confidential client information.

Law Firms and the Growth of Deepfakes

Coming in second only to malware infections, the rise of deepfakes has become a growing concern of law firms around the globe. A <u>deepfake</u>, or "a specific kind of synthetic media where a person in an image or video is swapped with another person's likeness", presents a particular kind of challenge for the world of cybersecurity. However, many law firms are coming to understand that training and thoughtful preparation for deepfakes will be essential to protecting the integrity of their practice in the near future.

Deepfakes could pose a wide variety of problems, including "client voice cloning". Considering the sensitive data that firms often hold for their clients, it is imperative that they are adequately guarded against threats to such information.

A panel of law and cybersecurity experts recently <u>offered</u> tips for the battle against deepfakes on the *Above the Law* blog. First, the authors urge recognition of common hallmarks of deepfake schemes:

- The communication is urgent, particularly when monies are to be wired immediately. The
 authors all agree that you should take special care when you are asked to deal in
 cryptocurrencies which are still often fraught with risks.
- Gifts cards? Oh yes, we have seen a law firm where an employee was asked to buy gift cards by the "managing partner". She bought \$1,200 worth of gift cards which ended up in the criminal's hands. And no, the firm did not reimburse her. A law firm's version of "tough love", we suppose.
- Other indicators of probable fraud include "don't tell anybody what you're doing" warnings, asking for personal/confirmation information, and telling you to keep the communication itself on the "down low".

Consider employing a code word to connote authentic communications. This chosen term should be one unlikely to come up naturally in a legal discussion. Although this practice is imperfect, it is simple.

Fortunately, as deepfakes become more sophisticated, so likely will detection technologies. The key is to stay informed and to provide practical and up-to-date training for firm employees to protect themselves and clients.

Michigan Man Attends Zoom Hearing While Driving Without a License

Over the past few years, many have fallen victim to the potential foibles of video conferencing. In fact, who can forget the havoc that a <u>cat filter</u> can wreak on a court proceeding? Nevertheless, one Michigan man has gained national attention for his <u>virtual blunder</u> during a May hearing.

Last month, Corey Harris attended a hearing via Zoom related to prior criminal charges. It took only a moment for the presiding judge, Hon. J. Cedric Simpson, to notice that Harris was driving as he joined the video meeting. Harris announced that he was, at present, pulling into a parking lot and proceeded to proudly confirm when his car was stationary.

The problem in this case, however, is that, as Judge Simpson queried knowingly, "This is a driver

with a license suspended?".

The prosecutor verified, "That is correct, your Honor."

"I don't even know why he would do that," Simpson uttered with disbelief. He revoked Harris's bond, ordering him to turn himself in by 6:00pm that day at the risk of the issuance of a bench warrant.

In a video excerpt of the proceeding <u>available via</u> CBS News, Harris is seen rolling his head in clear anguish as he realizes that he filmed himself committing a crime during his court hearing.

Is a Taco a Sandwich? An Indiana Court Says Yes

The online community, for years, has been debating what does and does not constitute a sandwich. Finally, an Indiana court has provided an answer – sort of.

Is a taco a sandwich? A Superior Court Judge in Allen County says yes.

In 2022, Fort Wayne restaurant-owner Martin Quintana <u>sought</u> to open a second location of his eatery The Famous Taco. The restaurant would prepare made-to-order tacos, burritos, and tortas in an area zoned for residential use. Limited commercial development is permitted in the area, allowing "a sandwich bar-style restaurant whose primary business is to sell 'made-to-order' or 'subway-style' sandwiches".

Quintana requested an amendment to the agreement, which would allow him to open his restaurant on the property, but was denied by the Fort Wayne Plan Commission. He appealed to the county court who ultimately ruled in his favor. Judge Craig J. Bobay's decision stated that Quintana's amendment proposal was "certainly courteous [but] not necessary" as the restaurant's planned offerings, in fact, would fall within the scope of the original zoning terms.

The decision concludes:

The Court agrees with Quintana that tacos and burritos are Mexican-style sandwiches, and the original Written Commitment does not restrict potential restaurants to only American cuisine-style sandwiches. The original Written Commitment would also permit a restaurant that serves made-to-order Greek gyros, Indian naan wraps, or Vietnamese banh mi if these restaurants complied with the other enumerated conditions.

Attorney Well-Being

Lawyers Concerned for Lawyers Hosts Annual Law School Deans Conference

"If we don't care about [students'] well-being, why should they care about others' well-being in practice?" posed Randy Lee, Professor of Law at Widener Commonwealth, at this year's annual conference for Deans of Students at Commonwealth area law schools. Recent literature articulates that a culture of well-being and accepted mental health support amongst legal professionals starts in law school. In legal practice, unchecked challenges to mental health may cause an attorney to neglect client needs, to lose focus on casework, or to act in an otherwise

uncharacteristic manner, even developing a pattern of behavior that may lead to disciplinary action.

On Monday, June 3rd, <u>Lawyers Concerned for Lawyers of Pennsylvania</u> (LCL) hosted its annual deans conference at Widener University Commonwealth Law School in Harrisburg. Also in attendance were representatives from the PA Board of Law Examiners as well as the Disciplinary Board. The conference facilitates open dialogue between law school administrators in and around the state and organizations supporting the legal profession.

Attendees discussed recent law school mental health studies, well-being needs of students and gaps in current resources, disability accommodations, networking and mentorship, life skills programming, and implications of an impending NextGen Bar Exam. School representatives also presented examples of well-being practices in place that currently are best assisting their students.

LCL offers a wide variety of excellent <u>resources</u> tailored to the unique experiences of <u>law students</u>, including referral to a qualified healthcare provider for a free and confidential consultation and diagnosis, development of a personalized treatment plan, peer support from a recovering law student or lawyer who has faced and overcome similar mental health or substance use challenges, and a wide variety of pertinent literature.



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 new "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, particularly as they relate to the legal profession.

DISCIPLINARY BOARD



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 ·

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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.



New AOPC Office of Behavioral Health Announced

Last month, the Administrative Office of Pennsylvania Courts (AOPC) announced the creation of its Office of Behavioral Health. This new office will "work to identify gaps in the system, to address key issues including access to services and support, and pinpoint intersections between at-risk populations and the courts in a wide range of matters, including truancy, domestic relations, juvenile delinquency and dependency, criminal justice and civil commitments."

In conjunction with May's Mental Health Awareness Month, the AOPC asserted its commitment to ensuring equal access to justice for all Pennsylvanians. PA Supreme Court Chief Justice Debra Todd noted, "Pennsylvanians with mental illness need access to early intervention, crisis stabilization, behavioral health treatments, and other supports to reach fair and appropriate outcomes."

Later this year, the AOPC, the Pennsylvania Commission on Crime and Delinquency, and other government and community organizations will collaborate to host a statewide mental health summit with the goal of creating a plan for action to better court responses to behavioral health issues.

Read the full press release here.

Pennsylvania Courts Releases New Infographic Featuring Mental Health Courts

The Administrative Office of Pennsylvania Courts recently <u>released</u> a new infographic featuring data from Pennsylvania's mental health courts.

Mental health courts "partner key justice system officials with leaders in the mental health system to divert offenders with severe mental illness into a judicially supervised program and includes community-based treatment", recognizing that, in recent years, the number of defendants with serious untreated mental illnesses has drastically increased. Currently, there are twenty-eight mental health courts throughout the Commonwealth.

PA Supreme Court Justice Kevin Dougherty explained, "Across the nation, courts have seen the behavioral health crisis grow in severity, frequency and intensity and the Pennsylvania judicial system is not immune. Pennsylvanians are struggling and finding there are more barriers to the road to help and self-sufficiency than there are outlets for support. We must change that."

Access the full press release here.

Pennsylvania's Mental Health Courts



What are Mental Health Courts (MHC)?

MHCs are problem-solving courts that work with key justice system officials and leaders in the mental health system to divert offenders with severe mental illness into a judicially-supervised program, including community-based treatment.

Statewide admission data (2022):

367 people were admitted.

67% of participants were male.

Average age of participants is 36

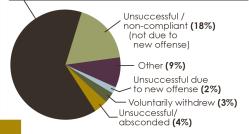
Among successful graduates, there was a

116% increase

in employment.

Statewide discharge data (2022):

64% (187) of all discharges graduated successfully



Pennsylvania's MHCs: 28 courts <u>currently</u>

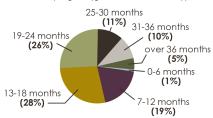


11% of participants

improved their **level of education** at discharge.

74% successfully completed the program in 2 years or less.

Months in program (graduated successfully):



Additional data, including county-level data, available at

http://www.pacourts.us/ news-and-statistics/ research-and-statistics/

AOPC

From the Pennsylvania Bar Association



PBA Offers Pro Bono Opportunities for the Summer

Looking to volunteer to provide pro bono legal assistance? The PBA offers many opportunities, regardless of practice area or setting, in which both members and non-members can participate!

Wills for Heroes

<u>Wills for Heroes Clinics</u> needs volunteer attorneys and attorneys. Most events occur on Saturdays and run from 9:00am to 4:00pm. From 9:00-11:00am, free mandatory volunteer training is provided, often for two CLE credits (1.0 ethics and 1.0 substantive). Then, from 11:00am to 4:00pm, volunteers provide estate planning for first responders and veterans. Please visit <u>Wills for Heroes (pabar.org)</u> for additional details.

Note these upcoming Wills for Heroes events:

- June 15, 2024 Cumberland County, Mechanicsburg, PA Bar Institute
- June 22, 2024 Bucks County, Lower Southampton Fire Department (event full)
- July 13, 2024 Lehigh County, Lehigh County Bar
- July 20, 2024 Allegheny County, White Oak
- August 10, 2024 Northern Tier (McKean, Potter, Tioga, Cameron Counties), details TBD
- August 17, 2024 Delaware County, details TBD

Pennsylvania Free Legal Answers

Lawyer volunteers are needed now for <u>Pennsylvania Free Legal Answers</u>, an automated tool developed by the American Bar Association.

Using a website form, a public user of the program can request brief advice about a specific civil legal issue. A volunteer lawyer provides basic legal advice without the expectation of long-term representation.

To participate, a legal volunteer completes three steps:

- Sign the <u>Attorney User Agreement;</u>
- Create a password to set up a volunteer account; and
- Provide contact information and PA Attorney ID number.

For additional details, visit <u>Pennsylvania Bar Association > For Lawyers > Pro Bono Services > Pennsylvania Free Legal Answers (pabar.org).</u>

Pro bono service is important; it helps the community and the operation of the judicial system. Read Chief Justice Todd's <u>letter</u> thanking attorneys who already provide pro bono service and urging those who do not to make this the year to volunteer to make a difference.

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 their website or follow 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

Resources

Pending Cases Recent Cases

<u>Case Research Collection</u> <u>Attorney Gateway</u>

Rules Search Opinions

<u>FAQs – For the Public</u> <u>FAQs – For Attorneys</u>

<u>Lawyer Well-Being</u> <u>Pro Bono</u>

Annual Report <u>Discipline Statistics</u>

PA CLE Board

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