

**IN THE SUPREME COURT OF PENNSYLVANIA**

OFFICE OF DISCIPLINARY COUNSEL,	:	No. 3132 Disciplinary Docket No. 3
	:	
Petitioner	:	No. 44 DB 2025
	:	
v.	:	Attorney Registration No. 87421
	:	
PAUL S. PETERS, III,	:	(Montgomery County)
	:	
Respondent	:	
	:	

**ORDER**

**PER CURIAM**

**AND NOW**, this 9<sup>th</sup> day of October, 2025, upon consideration of the Recommendation of the Three-Member Panel of the Disciplinary Board, the Joint Petition in Support of Discipline on Consent is granted, and Paul S. Peters, III, is suspended on consent from the Bar of this Commonwealth for a period of two years. Respondent shall comply with the provisions of Pa.R.D.E. 217 and pay costs to the Disciplinary Board. See Pa.R.D.E. 208(g).

A True Copy Nicole Traini  
As Of 10/09/2025

Attest:   
Chief Clerk  
Supreme Court of Pennsylvania

**BEFORE THE DISCIPLINARY BOARD OF THE  
SUPREME COURT OF PENNSYLVANIA**

OFFICE OF DISCIPLINARY COUNSEL, :	No. 44 DB 2025
Petitioner :	
v. :	
	Attorney Reg. No. 87421
PAUL S. PETERS, III, :	
Respondent :	(Montgomery County)

**JOINT PETITION IN SUPPORT  
OF DISCIPLINE ON CONSENT  
PURSUANT TO Pa.R.D.E. 215(d)**

Petitioner, the Office of Disciplinary Counsel (hereinafter, "ODC") by Thomas J. Farrell, Chief Disciplinary Counsel, and Jennifer Flemister, Disciplinary Counsel and Paul S. Peters, III, Esquire (hereinafter "Respondent"), by and through his counsel, Daniel J. Siegel, Esquire, respectfully petition the Disciplinary Board in support of discipline on consent, pursuant to Pennsylvania Rule of Disciplinary Enforcement ("Pa.R.D.E.") 215(d), and in support thereof state:

1. ODC, whose principal office is situated at Office of Chief Disciplinary Counsel, Pennsylvania Judicial Center, Suite 2700, 601 Commonwealth Avenue, P.O. Box 62485, Harrisburg, Pennsylvania 17106, is invested, pursuant to Pa.R.D.E. 207, with the power and duty to investigate all matters involving alleged misconduct of an attorney admitted to practice

**FILED**  
**08/13/2025**  
**The Disciplinary Board of the  
Supreme Court of Pennsylvania**

law in the Commonwealth of Pennsylvania and to prosecute all disciplinary proceedings brought in accordance with the various provisions of the aforesaid Enforcement Rules.

2. Respondent was born in October 1976 and was admitted to practice law in the Commonwealth on October 25, 2001. Respondent is on active status and his last registered address is 5 Develon Road, Elkins Park, PA 19027. Respondent is subject to the disciplinary jurisdiction of the Disciplinary Board of the Supreme Court.

3. Respondent has no prior record of discipline in Pennsylvania.

4. Respondent's affidavit stating, *inter alia*, his consent to the recommended discipline is attached as Exhibit A.

### **SPECIFIC FACTUAL ALLEGATIONS ADMITTED**

#### **SCHULTE LITIGATION MATTER**

5. On December 30, 2020, a Writ of Summons was filed in the civil matter captioned: *Christie Schulte v. Christopher D Canale & David A. Feret, Jr.*, in the Court of Common Pleas of Chester County, Docket Number: 2020-09505-RC (hereinafter "Schulte Litigation").

6. On May 25, 2021, a Complaint was filed in the Schulte Litigation.

7. On July 6, 2021, a Default Judgement was entered against both Schulte Litigation Defendants for failure to file a responsive pleading.

8. On July 23, 2021, Respondent filed an Entry of Appearance in the Schulte Litigation on behalf of Mr. Canale and Mr. Feret.

9. On July 26, 2021, Respondent filed a Motion to Open Default Judgement in the Schulte Litigation.

10. On November 20, 2021, Judge Edward Griffith granted Respondent's Motion to Open the Default Judgement against Mr. Canale and Mr. Feret.

11. On December 21, 2021, Respondent filed an Answer and New Matter in the Schulte Litigation.

12. On November 22, 2022, Alexis Roth, Esquire entered her appearance in the Schulte Litigation on behalf of the Plaintiff.

13. On February 1, 2023, the Schulte Litigation was reassigned from Judge Griffith to Judge Anthony Verwey.

14. On February 17, 2023, Ms. Roth filed a Motion to Extend the Fact Discovery Deadline.

15. By Order dated February 27, 2023, Judge Verwey granted Ms. Roth's February 17, 2023 Motion and decreed that:

- a. All discovery be completed by May 3, 2023;

- b. Any expert report of Plaintiff should be delivered to Defendants no later than May 1, 2023;
  - c. Any expert report of Defendant should be delivered to Plaintiff no later than May 29, 2023;
  - d. The parties should file dispositive motions no later than July 16, 2023; and
  - e. The matter should be included on the first trial list published on or after August 2023.
16. Respondent received the February 27, 2023 Order.
17. Respondent failed to comply with the February 27, 2023 Order.
18. On March 7, 2023, Respondent was served with Plaintiff's first set of Interrogatories, Request for Production of Documents and Request for Admissions.
19. On March 16, 2023, Ms. Roth served Notices of Depositions to Respondent of Mr. Canale and Mr. Feret.
20. Respondent received both Notices of Depositions.
21. On April 10, 2023, Ms. Roth:
- a. called, emailed, and mailed a letter to Respondent informing him that all discovery responses, which were due on April 6, 2023, had not been provided;

- b. sent Respondent revised notices for the Defendants; and
- c. adjusted the date of the depositions of Mr. Canale and Mr. Feret to April 19, 2023.

22. Respondent was put on notice of the revised date of the depositions.

23. On April 17, 2023, Ms. Roth emailed Respondent the deposition confirmation and Zoom link for the approaching April 19, 2023 depositions of Mr. Canale and Mr. Feret.

24. Respondent received the April 17, 2023 email and Zoom link.

25. Respondent failed to:

- a. respond to Ms. Roth's April 10 and April 17, 2023 communications; and
- b. advise Mr. Canale and Mr. Feret of the April 19, 2023 scheduled deposition.

26. On April 19, 2023, neither Respondent nor his clients appeared for the scheduled deposition.

27. On April 19, 2023, Ms. Roth filed a Motion to Compel Discovery.

28. Respondent received the April 19, 2023 Motion, but did not respond.

29. By Order dated May 15, 2023, Judge Verwey granted Ms. Roth's Motion to Compel and decreed that:

- a. All matters properly subject to Plaintiff's requests are deemed admitted;
- b. Defendants were to provide answers to interrogatories and requests for production within 14 days of the order;
- c. Defendants were to appear for an oral deposition on an agreed upon date and time, but no later than 30 days from the date of the order;
- d. Defendants were to pay the court reporter fees within 5 days of the date of the order; and
- e. Upon completion of Defendants' depositions, Plaintiff's counsel could submit a revised scheduling order establishing the close of discovery thirty days after the final depositions and that all dates thereafter extended accordingly.

30. Respondent received notice of the May 15, 2023 Order, but failed to respond to Plaintiff's Interrogatories and Request for Production and failed to provide responsive documents.

31. In a certified letter and an email to Respondent dated May 16, 2023, Ms. Roth sent Respondent copies of the May 15, 2023 court order and the court reporter invoice.

32. Respondent received Ms. Roth's May 16, 2023 certified letter and email.

33. In an email dated May 18, 2023, Ms. Roth advised Respondent she had left him a voicemail and requested that Respondent provide proposed dates for depositions of Mr. Canale and Mr. Feret.

34. Respondent received Ms. Roth's May 18, 2023 email, but did not respond.

35. In an email to Respondent dated May 18, 2023, Angela Davis, a paralegal at Ms. Roth's law firm, sent Respondent the following:

"Good afternoon Paul,

This message is just following up on the voice message I left for you requesting the Depositions of Christopher Canale and David Feret, Jr. Per the Court's 5/13/23 Order we must schedule an agreed upon time for depositions. Please provide dates for these depositions as soon as possible. Thanks."

36. Respondent received Ms. Davis' May 18, 2023 email.



37. Respondent did not respond to Ms. Davis' May 18, 2023 email or return Ms. Davis' phone call.

38. In a certified letter and an email to Respondent dated May 22, 2023, Ms. Roth stated in part:

“Per the Court’s May 15, 2023, Order Defendants are to appear for oral depositions within 30 days. We have been trying to contact you by phone and email to coordinate a date, however, you have not responded to our attempts. Therefore, enclosed, please find the 2nd Notices of Depositions of Defendants Canale and Feret, both for June 5, 2023, to be taken by Zoom. Please contact us within the next seven days if these dates are not amenable. If we do not hear from you, we will move forward with the depositions as scheduled.”

39. Respondent received Ms. Roth's May 22, 2023 certified letter and email, but did not respond.

40. Respondent failed to propose alternative dates to Ms. Roth for the depositions of Mr. Canale and Mr. Feret.

41. On May 31, 2023, Ms. Roth filed a Motion for Contempt for Defendants' failure to comply with the May 15, 2023 Order.

42. By Order dated June 22, 2023, Judge Verwey decreed that:

- a. Fact and expert discovery would end on July 7, 2023;
- b. Dispositive motions should be filed no later than 30 days from the close of discovery on August 7, 2023;
- c. The parties should file responses to dispositive motions no later than 30 days and replies to responses no later than 14 days thereafter; and
- d. The matter should be included on the first trial list published on or after November 2023.

43. Respondent received a copy of the June 22, 2023 Order, but failed to comply with the June 22, 2023 Order.

44. On August 8, 2023, Ms. Roth filed a Motion for Summary Judgment.

45. On October 23, 2023, Judge Verwey denied Ms. Roth's Motion for Summary Judgment.

46. On October 30, 2023, Judge Verwey granted Ms. Roth's Motion for Continuance and rescheduled the trial to May 2024.

47. In or about February of 2024, Respondent requested an emergency telephone conference with opposing counsel and Judge Verwey.

48. During the February 2024 phone conference, Respondent informed Judge Verwey and Ms. Roth that Respondent:

- a. was suffering from anxiety and believed he could not continue his representation in the Schulte Litigation; and
- b. would notify Mr. Canale and Mr. Feret that he was unable to continue his representation and that they should find new counsel.

49. As a result of Respondent's disclosure regarding his health, the trial in the Schulte Litigation was rescheduled from May 2024 to September 9, 2024.

50. Following the February 2024 phone conference, Respondent failed to notify Mr. Canale or Mr. Feret that Respondent was unable to represent them, nor did Respondent counsel them to obtain new representation.

51. Following the February 2024 phone conference, Respondent failed to take prompt action to withdraw his representation of Mr. Canale and Mr. Feret.

52. Between February 2024 and September 4, 2024, Respondent took no steps to withdraw his appearance in the Schulte Litigation.

53. Between February 2024 and September 4, 2024, Respondent missed pre-trial filing deadlines and failed to contact Ms. Roth about potential settlement in the Schulte Litigation.

54. On March 22, 2024, William T. Lawson, III, Esquire entered his appearance on behalf of Defendant David Feret in the Schulte Litigation.

55. On July 10, 2024, Ms. Roth filed a Motion for Leave to Discontinue Case Against Defendant David A. Feret, Jr.

56. On August 7, 2024, Judge Verwey granted Plaintiff's Motion for Leave to Discontinue the case against Mr. Feret.

57. On August 23, 2024, Ms. Roth filed a Motion in Limine, Pre-Trial Statement and Proposed Findings of Fact and Conclusions of Law in the Schulte Litigation.

58. Ms. Roth's Motion in Limine requested that the Court:

- a. prohibit Defendant Canale from offering documentary and testimonial evidence at trial; and
- b. direct Mr. Canale to pay reasonable legal fees.

59. Respondent failed to respond to Mr. Roth's Motion in Limine and failed to file a Pre-Trial Statement.

60. Respondent failed to notify Mr. Canale of Plaintiff's August 23, 2024 Motion in Limine and its potential ramifications.

61. On September 4, 2024, 5 days before the scheduled trial in the Schulte Litigation, Respondent filed a Motion to Withdraw as Counsel and

Allow Defendant Christopher Canale Time to Obtain New Counsel, stating in part that:

- a. Respondent was “unable and unprepared to proceed to trial on Defendant Canale’s behalf and provide the necessary and competent legal representation Defendant Canale deserves or requires”;
- b. Mr. Canale’s “interests and rights would be best served through new counsel with whom Counsel Peters will cooperate and provide whatever information is necessary;” and
- c. Respondent believed that allowing Mr. Canale to obtain new counsel would not prejudice the Plaintiff or Co-Defendant.

62. By Order dated September 5, 2024, Judge Verwey granted Respondent’s Motion to Withdraw.

63. Respondent failed to terminate his services and withdraw his representation of Mr. Canale and Mr. Feret due to his physical or mental condition which materially impaired his duty to represent them.

64. From at least May 2023, Respondent was suffering from a physical or mental condition which materially impaired his ability to represent his clients, yet he failed to timely withdraw his representation of Mr. Canale and Mr. Feret.

65. On September 13, 2024, attorney Scott Jeffrey Werner entered his appearance in the Schulte Litigation on behalf of Defendant Canale.

**COMPLAINT OF PATRICK J. BRADLEY**

66. On June 21, 2021, Patrick Joseph Bradley, a disbarred attorney, was sentenced after he pleaded guilty to over 80 charges including theft by unlawful taking, theft by deception, receiving stolen property theft by failure to make required disposition of funds received, deceptive business practices and unauthorized practice of law.

67. On July 6, 2022, Mr. Bradley filed a Pro Se Motion for Post Conviction Collateral Relief. (“PCRA”)

68. By Order dated July 18, 2022, Judge Wendy Rothstein appointed Respondent as PCRA counsel for Mr. Bradley in the matter captioned: *Commonwealth of Pennsylvania v. Partick Joseph Bradley* in the Court of Common Pleas of Montgomery County Docket No. CP-46-CR-0003075-2017. (Hereinafter “PCRA Matter”)

69. The July 18, 2022 Order, in part:

- a. served as Respondent’s Entry of Appearance; and
- b. granted Respondent 60 days from the date of the Order to either file an Amended PCRA Petition or a Turner/Finley letter.

70. By letter to Respondent dated August 23, 2022, Mr. Bradley, stated *inter alia*:

a. "I am writing to follow up with you regarding my PCRA petition pending in front of Judge Rothstein. Presumably you have already received a copy of the PCRA petition I filed and may have also had time to gather some of the transcripts as well as the complete file. . ."

b. "There are multiple issues I would like to discuss with you prior to filing an amended petition, as well as a few other issues to explore adding to the petition."

c. "P.S.S. I use the inmate email system and can send you a multitude of information quickly if you wish to use it to communicate with me."

71. On September 21, 2022, Respondent untimely filed a Request for an Extension of Time in Mr. Bradley's PCRA matter.

72. On September 22, 2022, Respondent received Mr. Bradley's August 23, 2022 certified letter, but did not respond.

73. By Order dated September 22, 2022, Judge Rothstein granted Respondent's request and gave Respondent an additional 30 days from the date of the Order to file an Amended PCRA or Finley letter.

74. On November 7, 2022, Respondent untimely filed a Request for an Extension of Time in Mr. Bradley's PCRA matter.

75. By Order dated November 9, 2022, Judge Rothstein granted Respondent's request and gave Respondent an additional 30 days from the date of the Order to file an Amended PCRA or Finley letter.

76. On November 12, 2022, Respondent:

- a. met with Mr. Bradley via a video visit; and
- b. assured him that Respondent would be filing an amended PCRA petition and a request to schedule an evidentiary hearing no later than early 2023.

77. After November 12, 2022, Respondent:

- a. ceased all communication with Mr. Bradley;
- b. effectively abandoned his representation of Mr. Bradley; and
- c. failed to take the any action in Mr. Bradley's PCRA matter.

78. Respondent failed to file an amended PCRA or Finley letter in Mr. Bradley's PCRA matter by the deadline set by the Court in its November 9, 2022 Order.

79. In a letter to Respondent dated January 30, 2023, Mr. Bradley wrote, in part:



“I’m writing to follow up from my last letter of December 27, 2022 regarding several issues to be addressed.”

80. Respondent received Mr. Bradley’s January 30, 2023 correspondence, but did not contact or respond to Mr. Bradley.

81. In a letter to Respondent dated March 1, 2023, Mr. Bradley, *inter alia*:

a. stated that he was following up from his letters dated December 23, 2022 and January 30, 2023;

b. complained that Respondent had only communicated with him on one occasion during the November 2022 video visit and had ignored numerous attempts by Mr. Bradley and his sister to communicate;

c. asked that Respondent communicate with him via the prison’s email system as Mr. Bradley did not have the funds to continue sending certified letters; and

d. requested Respondent to confirm receipt of Mr. Bradley’s letter.

82. Respondent received Mr. Bradley’s March 1, 2023 letter, but did not respond.

83. In a letter sent via certified mail to Respondent dated April 11, 2023, Mr. Bradley, *inter alia*:

- a. indicated that he was writing to Respondent out of concern for Respondent's lack of communication;
- b. stated that during Respondent's only communication on November 22, 2022, Respondent had told him an evidentiary hearing was necessary and that Respondent expected an evidentiary hearing no later than May 2023;
- c. maintained that Respondent told him that Respondent would be filing an amended petition and expected an evidentiary hearing no later than May 2023;
- d. noted that the last court ordered deadline to file the amended petition was December 9, 2022; and
- e. asked that Respondent reply and provide him with the status of his matter.

84. The April 11, 2023 letter was returned to Mr. Bradley as "Unclaimed Unable to Forward."

85. By letter dated May 8, 2023 to Judge Rothstein, Mr. Bradley:

- a. expressed his frustration and inability to contact Respondent and concern for Respondent's refusal to communicate with Mr. Bradley or members of his family; and
- b. requested that the Court appoint new counsel to represent Mr. Bradley in his PCRA.

86. In May 2023, Respondent contacted Judge Rothstein's chambers and:

- a. informed the Court of Respondent's ongoing medical issues rendering him unable to adequately handle Mr. Bradley's matter;
- b. requested new counsel be appointed for Mr. Bradley; and
- c. requested that Respondent be temporarily taken off of the court appointment list.

87. By Order dated June 13, 2023, Judge Rothstein stated that "in light of PCRA Counsel, Paul S. Peters III, Esquire's inability to represent Defendant" Respondent's services were terminated, and Mr. Bradley was appointed new PCRA counsel.

88. Respondent communicated with Mr. Bradley on only one occasion in almost eleven months in connection with Mr. Bradley's PCRA matter.

89. Respondent did not file an amended PCRA or Finley letter on behalf of Mr. Bradley, despite being granted multiple extensions by the Court.

90. To the extent that Respondent was unable to competently represent Mr. Bradley, Respondent failed to timely obtain the Court's permission to terminate his representation and failed to take reasonably practicable steps to protect Mr. Bradley's interests.

**COMPLAINT OF RICHARD GREENWALD**

91. On or about May 23, 2022, Richard Greenwald contacted Respondent regarding representation in a landlord-tenant matter.

92. Mr. Greenwald sought the return of his security deposit and disputed a final accounting from his landlord, the George Woodward Company (hereinafter "Woodward") including:

- a. late fees;
- b. an early termination fee;
- c. the relisting fee;
- d. May rent charges; and
- e. the water/sewer bill.

93. Mr. Greenwald requested Respondent to send Woodward, or their attorneys, a letter disputing the final accounting and then follow up with the landlord and negotiate on his and his wife, Nancy Katz's behalf.

94. On May 23, 2022, Mr. Greenwald sent Respondent the following email and copied Ms. Katz:

“Paul,

Please see attached. I created a cover note for you outlining the issue “Notes for Peter” and also provided lease and other documents including email exchanges. My hope is you reach out [to Woodward] and at best we get some of our deposits back.

Second best they drop any charges they are requesting from us.”

95. On May 24, 2022, Respondent responded to Mr. Greenwald’s May 23, 2022 email:

“Confirming receipt. I was in court all day today and will be as well tomorrow; therefore, I will review everything on Thursday.”

96. On May 27, 2022, Mr. Greenwald sent Respondent the following email:

“Hey Paul,

Just checking in to see if you had a chance to take a look at the materials.”

97. Respondent received Mr. Greenwald’s May 27, 2022 email, but did not respond.

98. On June 3, 2022, Respondent and Mr. Greenwald had the following email exchange:

a. Respondent: "Below is a link to my client management program, kindly complete and submit the form. From there an invoice will get generated, Thank you."

b. Mr. Greenwald: "Great filled it out and will turn the invoice right around. One thing to potentially add to the letter too is that over the years we asked for a copy of the water bill and we never got it. (There were three units in the building and we shared one water line I guess. . .)"

99. On June 3, 2022, Mr. Greenwald completed Respondent's Intake Form and paid Respondent's \$500 invoice to The Peters Firm, PLLC via a credit card payment.

100. On June 11, 2022, Mr. Greenwald sent Respondent the following email:

"Paul.

Any chance you could get that letter out soon?"

101. On June 14, 2022, Mr. Greenwald sent Respondent the following text:

“Paul, just wanted to see when you think you might be able to get that letter out to the Woodwards. Thanks, Richard.”

102. Respondent received Mr. Greenwald’s June 11, 2022 email and June 14, 2022 text message.

103. In a June 17, 2022 email to Mr. Greenwald Respondent stated:

“Richard,

Very sorry, I am finishing the letter right now. My daughter was in the hospital and it sent everything into chaos. She is all good and things are back to normal, so I am catching up. Again, very sorry. I will send over the letter once completed.”

104. On June 21, 2022, Mr. Greenwald sent Respondent an email stating in part:

“Hey Paul,

Any luck getting the letter out? I fear we may be taking too long-should I, or are we okay in terms of timing?”

105. Mr. Greenwald was concerned that without the letter from Respondent, Woodward would believe Greenwald and his wife were ignoring Woodward and expose Greenwald and his wife to potential legal action.

106. Respondent received Mr. Greenwald’s June 21, 2022 email, but did not respond.

107. On June 22, 2022, Mr. Greenwald sent Respondent a text message:

“Hey Paul do you have a sense when you might finish that letter for the Woodwards. Thanks, Richard”

108. On June 23, 2022, Respondent responded to Mr. Greenwald’s text message:

“Hi Richard, sorry in trial. The letter went out last Friday. I’ll resend it to you when I get back to the office this afternoon.”

109. Respondent’s representation that the “letter went out last Friday” was false and Respondent knew it to be false.

110. Respondent never sent a letter to Woodward throughout Respondent’s entire representation of Mr. Greenwald.

111. On June 26, 2022, Mr. Greenwald sent Respondent a text message:

“... hey Paul, just wanted to see if you sent it to me.”

112. On July 6, 2022, Mr. Greenwald forwarded Respondent an email he received from Woodward, which stated in part:

“We have emailed and mailed the accounting ledger, final statement and move in/out reports for 7902 Lincoln property on 5/17/22 to both Richard Greenwald and Nancy Katz. As of 7/6/22,



there is still a total balance of \$6,187.29. Please be advised we will be filing for collections.”

113. On July 6, 2022, Respondent and Mr. Greenwald had the following text message exchange:

- a. Mr. Greenwald: “Please listen to my vm – and see forwarded email. Woodward is taking us to collections and did not email that to you, but to us directly.”
- b. Respondent: “Thanks. I’ll deal with them. They never responded to me. Is it a collections letter or lawsuit?”
- c. Mr. Greenwald: “Collections... I forwarded the email to you. Thanks for handling this. And please share with me the original letter you sent them. I appreciate all this Paul [sic]”

114. Respondent’s representation that Woodward never responded to him was false and misleading because Respondent knew he had never contacted Woodward or anyone representing the Woodward.

115. On July 12, 2022, Mr. Greenwald left Respondent a voicemail inquiring about the letter Respondent purportedly sent to Woodward.

116. On July 13, 2022, Mr. Greenwald sent Respondent another email requesting that Respondent respond to Mr. Greenwald’s July 12<sup>th</sup> voicemail.

117. Respondent received Mr. Greenwald's July 13, 2022 email, but did not respond.

118. On July 15, 2022, Mr. Greenwald sent Respondent a text message:

"Did you see my email or hear my Voicemail [sic]? Thanks, Richard."

119. Respondent received Mr. Greenwald's July 15, 2022 text message, but did not respond.

120. On July 16, 2022, Mr. Greenwald sent Respondent another text message:

"Paul, please respond to all my messages to you, and please share your original letters to the Woodward's [sic] and follow up to their collections email. I am concerned you have not communicated with us or sent an engagement letter etc. Thanks Richard"

121. On July 18, 2022, Respondent had the following text message exchange with Mr. Greenwald:

a. Respondent: "Sorry Richard, had a personal emergency with my daughter. However, I have been following up with Woodward, but no success in getting a response. I am trying to

research if they have a law firm they typically utilize so I can reach out to them.”

b. Mr. Greenwald: “Thank you for letting me know. And if you could email me the letter you sent them I would appreciate it. Hey, hopefully this does not turn into a big deal and take a lot of time. I appreciate you getting back to me. I sincerely hope your daughter is okay. Take care...”

122. Respondent’s representation that he had been “following up with Woodward, but no success in getting a response” was false and misleading and Respondent knew it to be false and misleading.

123. On Wednesday August 3, 2022, Mr. Greenwald sent Respondent the following via text message:

“Paul, I still have not received anything. Please just forward me the original letter- and inform me of any updates. Thank you.”

124. Respondent received Mr. Greenwald’s August 3, 2022 text message, but did not respond.

125. On August 10, 2022, Mr. Greenwald sent the following text message:

“I sent you another email just now – if you can’t respond and provide us what we need, let’s just disengage and you can refund us our \$500. That of course is not what we want.”

126. On August 10, 2022, Respondent and Mr. Greenwald had the following email exchange in part:

a. Mr. Greenwald: “Paul, Can you please give me an update of where we stand with the Woodwards, a copy of the engagement letter, and the letter you sent to the Woodwards. At this point I am very concerned. I just want to know you are doing what you said you would do.”

b. Respondent: “Richard, I have tried to reach out to them multiple times and follow-up periodically. In over 20 years of practicing law I have never experienced a company of their caliber completely ignore legal inquiries. If they will not respond to me, the next thing to do is wait and see if they make any move such as a lawsuit; from their respond and the [sic] defend the action based on our arguments of no contract existing, that you gave reasonable notice, and their charges are extraordinary, and outlandish. I hesitate to be the first one to attempt any proactive legal action such as suing for all or some of the money back, as

I do not want to wake a sleeping bear if they are making the legal decision to drop the matter. I am around all day tomorrow if you want to give me a call.”

127. Respondent representations to Mr. Greenwald in his August 20, 2022 email that Woodward was ignoring Respondent’s legal inquiries were false and misleading, because Respondent had never sent a letter to them and Respondent knew Mr. Greenwald was under the impression he had.

128. After August 10, 2022, Respondent:

- a. ceased all communication with Mr. Greenwald; and
- b. effectively abandoned his representation of Mr. Greenwald.

129. On October 30, 2022, Mr. Greenwald sent Respondent the following email:

“Paul, Just asking again, that you please send me the original letter you sent the Woodwards and any other documentation to show you tried to pursue them and they did not respond. Again, I will take your advice to let sleeping dogs lie; but I also fear that at some point if I get a random letter from their lawyer or collections agent, *I won’t have evidence that you reached out.* Paul I really need you to confirm this email and follow up and forward me what you sent.” (emphasis added)

130. Respondent received Mr. Greenwald's October 30, 2022 email, but failed to respond.

131. On November 4, 2022, Mr. Greenwald sent Respondent this text message:

"Paul, I sent you another email. Can you please respond or is there someone else in your office that can share the materials?"

132. Respondent received Mr. Greenwald's November 4, 2022 text message, but did not respond to it.

133. On December 5, 2022, Mr. Greenwald sent Respondent the following text message:

"Just sent another email with a simple request that you send me the letter you sent the Woodwards and documentation of the calls. Please do so by the end of the week."

134. Respondent received Mr. Greenwald's December 5, 2022 text message, but did not respond.

135. On December 23, 2022, Mr. Greenwald submitted to ODC his complaint against Respondent.

136. On June 23, 2023, Woodward filed in the Philadelphia Municipal Court a Complaint against Mr. Greenwald and his wife.

137. Woodward's Complaint alleged that:

- a. Mr. Greenwald and his wife had vacated their rental property in April 2022 leaving “a ton of damages;” and
- b. requested a judgment of \$6,187.29 in damages and \$600.00 in legal fees.

138. On September 27, 2023, Mr. Greenwald and Woodward reached a settlement in which Mr. Greenwald and his wife agreed to pay \$150.00 and forfeit their deposits.

139. Respondent never provided Mr. Greenwald with a copy of the letter Respondent purportedly sent to Woodward.

#### **COMPLAINT OF SAMANTHA SAMMONS**

140. In or about March of 2021, Samantha Sammons consulted with Respondent regarding representation in her no-fault divorce matter.

141. Pitter Chagas De Medeiros is Ms. Sammons’ estranged husband.

142. On March 26, 2021, Respondent emailed Ms. Sammons a letter regarding her divorce stating *inter alia*:

- a. “You will be filing an uncontested divorce based on irreconcilable differences. The process is as follows:

- i. File the divorce complaint with the Montgomery County Court of Common Pleas with you as Plaintiff and your Pitter as Defendant;
- ii. Serve the divorce complaint on Pitter, which he can sign an acceptance of service form I will send him.
- iii. Upon serving Pitter with the complaint, the required 90-day waiting period will begin;
- iv. During the waiting period, we will finalize and sign the Property Settlement Agreement, sign affidavits consenting to the divorce, affidavits waiving additional notice about the divorce getting entered, affidavits of non-military service, and verifications of signatures;
- v. When the 90-days pass, the documents mentioned above and a divorce decree will get forwarded to the court for final approval and signature by the assigned judge;
- vi. Once submitted, the divorce decree will get signed anywhere from 30-90 days depending on the judge assigned and when he or she gets to signing it."



- vii. “My goal and intention are to navigate and complete this process as quickly, painlessly, compassionately and dignified as possible.”

143. In or about April of 2021, Respondent provided Ms. Sammons with a Fee Agreement stating *inter alia*:

- a. “The fees and costs for legal services are a flat attorney fee of \$1,000.00 and the court filing fee of \$300.00, for a total cost of \$1,300.00;” and
- b. “This fee includes the following specific legal services:
  - i. Prepare, file, and finalize a No-Fault Divorce with property settlement agreement.”

144. On April 29, 2021, Ms. Sammons paid \$1,300.00 to The Peters Firm, PLLC via a check.

145. On May 9, 2021, Ms. Sammons sent Respondent the following email:

146. “Hello Paul, I sent the payment of \$1300. Can you confirm you received it?”

147. On May 13, 2021, Respondent sent the following email to Ms. Sammons:

"I did get it Samantha. Sorry have been stick [sic] in multiple trials. I will have the divorce complaint over to you for review first thing next week. Enjoy your weekend!"

148. After initially wishing to delay filing the divorce complaint, Ms. Sammons sent Respondent the following email on August 9, 2021:

"After much thought and back and forth, I have decided to move forward with the divorce. I am no longer waiting. Could you please start the paperwork and let me know if there is anything you need from me."

149. On August 24, 2021, Respondent and Ms. Sammons had the following email exchange:

- a. Ms. Sammons: "I am following up to see if you received my previous email. I would like to move forward with the divorce."
- b. Respondent: "Ok Samantha. I will get the documents you need to review and sign over to you this week."

150. On September 7, 2021, Respondent sent Ms. Sammons the following email in part:

"I will have the complaint over to you to sign this week."

151. On September 25, 2021, Ms. Sammons sent Respondent the following email:

"I am checking in. I didn't receive anything to sign yet. Did you send it?"

152. Respondent received Ms. Sammons' September 25, 2021 email, but did not respond.

153. On October 1, 2021, Ms. Sammons emailed Respondent the following:

"I would really like to start the process of filing for the divorce. Is there anything you are waiting for from me? I have not received anything from you."

154. Respondent received Ms. Sammons' October 1, 2021 email, but did not respond.

155. On October 11, 2021, Respondent and Ms. Sammons had the following email exchange:

a. Ms. Sammons: "I have not heard from you for some time. I would like to seek another lawyer to file for this divorce. Could you please refund me the money sent via venmo of \$1,300.00."

b. Respondent: "I sent you the divorce complaint on Friday to review so I could file it today or tomorrow."

c. Ms. Sammons: "Was it sent via email? Can you send it again?"

- d. Respondent: Yes. I'm not on my way back from court, I'll resend first thing when I get back." [sic]
- e. Ms. Sammons: "Thank you!"
- f. Respondent: "Attached is the complaint for your review. If fine, please sign and return the page titled verification. I apologize for my nonresponse last week. The week before last my wife had surgery at John's [sic] Hopkins Medical Center and there were serious complications; therefore, the situation required my full attention. Everything is fine now, but I was in catch up mode last week. Again, if you get this signed over to me today, I can have the case filed and then out to Pitter right away. Thank you."

156. On October 11, 2021, Respondent filed Ms. Sammons' divorce complaint in the Court of Common Pleas of Montgomery County captioned: *Samantha Loudell Sammons v. Pitter Chagas De Medeiros* Case Number 2021-20263.

157. On October 26, 2021, Ms. Sammons emailed Respondent:

"Just following up, was there any response from Pitter?"

158. Respondent received the October 26, 2021 email from Ms. Sammons, but did not respond.

159. In a November 8, 2021 email Ms. Sammons again asked Respondent if he had any updates, to which Respondent responded:

“I have not. I am going to resend everything by mail, not email and do so with delivery confirmation. I will keep you updated.”

160. In another email to Respondent dated December 14, 2021, Ms. Sammons asked whether there was “any word on the divorce papers sent to Pitter.”

161. On December 16, 2021, Ms. Sammons sent Respondent the following email:

“Is there anything I can do to help get the papers to him? I am also wondering what happens next? I realize this could take some time. How long do we keep trying or waiting for him to sign?”

162. Respondent received Ms. Sammons’ December 14, 2021 and December 16, 2021 emails, but did not respond.

163. On January 3, 2022, Respondent and Ms. Sammons had the following email exchange:

a. Ms. Sammons: “Hope you had a great Christmas and New Year. I am checking in for any updates as well as following up

with my previous emails on that the next steps are. Please respond via email or call me on my cell.”

b. Respondent: “I did have a nice holiday, hope you did as well. I am going to head out to his residence this week or next to see if I can get it to him.”

c. Ms. Sammons: “Thank you for the update! What happens next, once the paperwork is given to him? Is there a limited amount of time he has to respond?”

d. Respondent: “Yes, he has 90-days, and after than [sic] the divorce can get entered.”

164. In an email dated January 21, 2022, Ms. Sammons asked Respondent whether he had served the Defendant.

165. Respondent received Ms. Sammons’ January 21, 2022 email, but did not respond.

166. In a subsequent email dated January 24, 2022, Ms. Sammons once again asked Respondent whether the Defendant had been served.

167. On January 28, 2022, Respondent sent Ms. Sammons an email stating:

“No one is there when I go. I am going to get a PI friend to help me. Have you heard from him?”

168. In an email dated February 23, 2022 Ms. Sammons stated that she was “following up” with Respondent to determine whether “there [had] been any progress.”

169. Respondent received Ms. Sammons’ February 23, 2022 email but did not respond.

170. On March 15, 2022, Respondent sent Ms. Sammons the following email:

“I am just waiting for Bucks County [sic] to issue a reinstated complaint to serve on him. After so many months the courts require the complaint to be reissued. I should have it today and then will send over to you with the affidavit of service to provide to the person serving him.”

171. On March 15, 2022, Respondent filed a Praecipe to Reinstate the Complaint in Ms. Sammons’ divorce matter.

172. Without Respondent’s help, Ms. Sammons found an individual to serve the Complaint on the Defendant on March 17, 2022.

173. On March 18, 2022, Ms. Sammons emailed Respondent:

“Papers were served. Please see attached affidavit. Do you need me to send you the hard copy? I am so happy to be getting all of

this over with. Now, it's only 90 days and everything will be completely filed and official, correct?"

174. On March 23, 2022, Respondent and Ms. Sammons had the following email exchange:

- a. Ms. Sammons: "Just confirming you received this email?"
- b. Respondent: "I finished a trial yesterday so am catching up on emails and yes I did get it. I am filing it with the court shortly. I have the 90 days marked on my calendar as June 16<sup>th</sup>. I will send you the documents to sign before that date. Did you get any response from him? I will let you know if I hear from him."

175. On June 16, 2022, Ms. Sammons sent the following email:

"Checking in. Is today the day?! I remember you said there was a paper to sign."

176. On June 17, 2022, Respondent responded to Ms. Sammons' June 16, 2022 email:

"Yes, working on drafting the documents today so we can get this matter wrapped up."

177. In an email dated June 20, 2022, Ms. Sammons copied the Defendant and sent Respondent the following:



“I attached Pitter to this email. He and I are wondering if you were able to draft the paperwork for the divorce?”

178. On June 21, 2022, Respondent emailed to Ms. Sammons an Affidavit of Consent, Waiver of Notice, Affidavit of Signature and Affidavit of Non-Military Service and advised:

“Once I have all documents returned I will submit them to the court for the final entry of divorce.”

179. In an email to Respondent dated June 22, 2022, Ms. Sammons stated the following:

“Thank you for sending these. Please see my attached signed documents in PDF format. Let me know if there is anything additional you need from me.”

180. On July 19, 2022, Respondent and Ms. Sammons had the following email exchange:

- a. Ms. Sammons: “Pitter sent these to me only, I apologize. I thought he “replied all” to the email but of course he didn’t.”
- b. Respondent: “Ok, thank you, I will get the final paperwork compiled and filed asap. Thanks.”

181. Between June 22, 2022 and July 19, 2022, Ms. Sammons provided Respondent with all of the requested documents and Respondent acknowledged receiving them.

182. On August 18, 2022, Ms. Sammons sent Respondent an email asking whether Respondent had any updates on her divorce matter.

183. Respondent received Ms. Sammons' August 18, 2022 email, but did not respond.

184. In an email dated August 29, 2022, Ms. Sammons once again requested that Respondent provide an update on the status of her divorce matter:

"Do you have any updates? Is there a divorce decree or something that we are waiting on?"

185. Respondent received Ms. Sammons' August 29, 2022 email, but did not respond.

186. On September 19, 2022, Ms. Sammons sent Respondent an email asking, "have the final documents been filed?"

187. On September 20, 2022, Respondent responded the following to Ms. Sammons:

"Yes, just waiting on the court to process and sign off on them."

188. Respondent's representation in his September 20, 2022 email that Ms. Sammons' final documents had been filed was false and misleading because he had not filed the final documents in Ms. Sammons' divorce matter.

189. At no time did Respondent file the "final documents" in Ms. Sammons' divorce matter with the court.

190. Respondent's September 20, 2022 email was his last communication with Ms. Sammons.

191. After September 20, 2022, Respondent effectively abandoned his representation of Ms. Sammons.

192. Respondent failed to notify Ms. Sammons he was terminating his representation.

193. On November 16, 2022, Ms. Sammons emailed Respondent:

"Pitter and I are both wanting to follow up. I know you have said we are waiting for the court to sign off and process the paperwork. Have you gotten anything back yet? If not, do you know how long the process will take?"

194. Respondent received Ms. Sammons' November 16, 2022 email, but failed to respond.

195. On November 21, 2022, Ms. Sammons sent Respondent an email stating that she was following up on her previous email.

196. Respondent received the November 21, 2022 email, but failed to respond.

197. After approximately three months of not receiving any further response from Respondent, Ms. Sammons called the Montgomery County Court of Common Pleas Prothonotary and was advised that contrary to Respondent's representations, the final documents in her divorce matter had not been filed.

198. On January 9, 2023, Ms. Sammons, on her own, filed the:

- a. Acceptance of Service from Mr. De Medieros on 3/17/2022;
- b. Necessary Affidavits;
- c. Waivers;
- d. Praecipe to Reinstate;
- e. Praecipe to Change Address; and
- f. Praecipe to Transmit/ 2 Certs.

199. On February 1, 2023, a Divorce Decree was issued in Ms. Sammons' divorce matter.

200. The only two documents Respondent filed for Ms. Sammons in her divorce matter were the Complaint on October 11, 2021, and the Praecipe to Reinstate on March 15, 2022.

**COMPLAINT OF KENJAH HUGHSTON**

201. On or about December 7, 2022, Respondent was appointed as conflict counsel in the criminal matter captioned: *Commonwealth of Pennsylvania v. Kenjah Javon Hughston* in the Court of Common Pleas of Montgomery County Docket Number CP-46-CR-0000591-2022. (hereinafter “Mr. Hughston’s Criminal Matter”)

202. On March 7, 2023, Respondent represented Mr. Hughston at a bench trial before Judge O’Neill, wherein Mr. Hughston was found guilty.

203. From the time of his appointment in December of 2022 through the March 7, 2023 guilty verdict, Respondent failed to reasonably consult with Mr. Hughston or promptly comply with his reasonable requests for information.

204. Mr. Hughston, his father and his child’s mother attempted to reach Respondent by phone, email, and text message on multiple occasions from December 2022 through March 2023 and Respondent continuously failed to respond.

205. Sentencing in Mr. Hughston's matter was delayed until October 19, 2023.

206. Between the March 7, 2023 verdict and Mr. Hughston's scheduled October 19, 2023 sentencing:

- a. Mr. Hughston sent a letter to Respondent and left Respondent a voicemail on two occasions; and
- b. Mr. Hughston's family members attempted and failed to reach Respondent by telephone on his behalf.

207. Respondent was aware of the various attempts of Mr. Hughston and his family to reach Respondent regarding Mr. Hughston's Criminal Matter but failed to respond or communicate with Mr. Hughston.

208. Respondent failed to communicate with Mr. Hughston or his family from the time of his verdict until Mr. Hughston's October 2023 sentencing.

209. On July 24, 2023, Mr. Hughston filed a *pro se* Motion to Substitute Counsel stating his grounds for the motion were *inter alia*:

"Attorney abandonment for over 5 months despite approaching [sic] court date, non communicated [sic] postponed court date and petitiones [sic] repeated inquiries through email, texts and calls."

210. Respondent received notice of Mr. Hughston's *pro se* filings, but failed to communicate with Mr. Hughston until Mr. Hughston's October 2023 sentencing hearing.

211. After Mr. Hughston's October 19, 2023 sentencing, Mr. Hughston told Respondent that he wanted to move forward with a direct appeal.

212. On November 16, 2023, Mr. Hughston sent Respondent an email stating:

"Hi, My family has been trying to contact you to confirm that you received the appeal points that I sent you. They've left multiple emails and text messages. I wanted to make sure all the charges I appealed were in my direct appeal. You can reach my father at 2159809017."

213. Respondent received Mr. Hughston's November 16, 2023 email, but did not respond.

214. On November 20, 2023, Respondent filed a Notice of Appeal to the Superior Court in Mr. Hughston's Criminal Matter.

215. Respondent failed to communicate with Mr. Hughston and inform him that Respondent had filed the Notice of Appeal.

216. By Order dated November 30, 2023, Judge Steven O'Neill decreed in part that:

- a. Respondent should file with the Clerk of Courts a Concise Statement of Matters Complained of within 21 days of the date of the docketing of the Order;
- b. Failure to timely file and serve the Concise Statement within 21 days would be deemed a waiver of all claimed errors; and
- c. Any issue not properly included in the Concise Statement would be deemed waived.

217. Respondent received the November 30, 2023 Order.

218. Respondent failed to file a Concise Statement, therefore waiving all of Mr. Hughston's claimed errors.

219. On December 5, 2023, the Superior Court sent Respondent a Pa. R.A.P. 3517 Docketing Statement Form in connection with Mr. Hughston's appeal to be completed and returned within ten days.

220. Respondent received the Docketing Statement.

221. Respondent failed to complete and file the Docketing Statement in connection with Mr. Hughston's appeal.

222. By Order dated February 5, 2024, the Superior Court:

- a. dismissed Mr. Hughston's appeal for failure to comply with Pa. R.A.P. 3517; and



- b. directed that Respondent file a certification with the court within 10 days, stating that Mr. Hughston had been notified of the dismissal of Mr. Hughston's appeal.

223. Respondent received the February 5, 2024 Order, but failed to file the certification with the court or notify Mr. Hughston of the dismissal of his direct appeal.

224. Respondent communicated with Mr. Hughston on only two occasions in the course of Respondent's seventeen (17) month representation of Mr. Hughston.

225. Respondent failed to act with reasonable diligence and promptness in representing Mr. Hughston and failed to:

- a. preserve Mr. Hughston's potential claims for appeal by complying with Pa.R.A.P. 1925(b); and
- b. file a Pa. R.A.P. 3517 docketing statement with the Superior Court, resulting in dismissal of Mr. Hughston's appeal.

226. Respondent ceased his limited communication with Mr. Hughston on or about October 19, 2023, effectively abandoning his client and failed to take the any steps to reasonably protect Mr. Hughston's interests.

227. By letter dated June 11, 2024, ODC sent Respondent via email and certified mail a DB-7 Request for Respondent's Statement of Position ("SOP") relating to Mr. Hughston's complaint.

228. The June 11, 2024 DB-7 letter also requested production of a copy of Respondent's file in connection with his representation of Mr. Hughston.

229. Respondent received the June 11, 2024 DB-7 letter but did not respond.

230. On July 18, 2024, the June 11, 2024 certified letter mailed to Respondent was sent back to ODC as "Return to Sender Unclaimed."

231. By correspondence dated July 18, 2024, ODC:

- a. advised Respondent it had not received his SOP relating to Mr. Hughston's complaint;
- b. advised Respondent that failure to respond without good cause is an independent ground for discipline pursuant to Pa.R.D.E. 203(b)(7); and
- c. requested that Respondent submit a SOP by July 28, 2024.

232. Respondent received ODC's July 18, 2024 correspondence but did not respond.

233. Respondent failed to provide a SOP to the June 11, 2024 DB-7.

**COMPLAINT OF JOEL A. HARDEN, SR.**

234. Beginning in or about the early 2000s, Respondent began an attorney-client relationship with Joel Harden representing him in numerous matters including:

- a. real estate;
- b. insurance;
- c. landlord tenant; and
- d. code violations.

235. In or about December 2019, Mr. Harden retained Respondent's representation in a matter pertaining to a discrepancy on his credit report impacting his business and personal matters.

236. Mr. Harden had previously filed for bankruptcy in 2015, which was discharged on April 21, 2016.

237. Despite his April 21, 2016 bankruptcy discharge, Mr. Harden:

- a. discovered that after applying for a line of credit that a mortgage servicer had purchased a debt that he believed was included in his discharge;
- b. believed that the balance of almost \$900,000.00 was erroneously being reported; and

c. believed that this lien was preventing him from obtaining lines of credit for his real estate development business.

238. Mr. Harden wanted Respondent to file a lawsuit against the mortgage company on Mr. Harden's behalf under the Fair Credit Reporting Act.

239. In a December 16, 2019 email to Respondent Mr. Harden stated the following in part:

- a. "I've been trying to get you to file this for almost two months. I am in a very critical situation. I am going to lose my house."
- b. "It's always hard to get to you. When we talk we always leave it that you will have it ready in a few days and then I can't get you for two weeks or so and you don't return my calls."
- c. "I am also going to need you to see if we can get an injunction or some type of action to slow things down and give this matter time to be heard. Every day this isn't filed is a day longer out when the case will be heard. I am going to run out of time as the bank is pressing hard. This is my ONLY chance. Every day is critical. I can't stress to you enough I AM IN TROUBLE. This is my only defense."

d. “If there was a reason you didn’t want to do this I would have appreciated you telling me a few months ago. I try to get you everyday [sic] to no avail.”

240. Respondent received, but failed to respond to Mr. Harden’s December 16, 2019 email.

241. On January 8, 2020, Mr. Harden sent Respondent the following text message:

“Paul, ?????” [sic]

242. Respondent received Mr. Harden’s January 8, 2020 text message, but did not respond.

243. On February 12, 2020, Respondent filed a complaint on behalf of Mr. Harden in the United States District Court of the Eastern District of Pennsylvania captioned *Joel A. Harden v. Trans Union LLC, Experian Information Solutions, Inc., Equifax Information Services, LLC, Innovis, LLC, Rushmore Loan Management Services and U.S. Bank National Association ND* (Hereinafter “Trans Union Litigation”) Docket # 2:20-cv-00798-BMS.

244. On February 13, 2020, a Summons was issued to each of the Defendants in the Trans Union Litigation.

245. On July 16, 2020, Respondent filed a Praecipe to Reissue Summons in the Trans Union Litigation.

246. On July 16, 2020, the Summonses were reissued as to each of the Defendants.

247. Respondent failed to timely serve the Defendants in the Trans Union Litigation.

248. On November 24, 2020, the Court ordered that the Trans Union Litigation be dismissed without prejudice for lack of prosecution.

249. Respondent did not inform Mr. Harden that the Trans Union Litigation was dismissed.

250. From about November 2020 through April 2021, Mr. Harden believed Respondent was working on the Trans Union Litigation.

251. On April 16, 2021, Mr. Harden sent Respondent an email that stated in part:

a. "I need to get these cases back open. I still don't understand how you could possibly have thought I wanted to abandon the FCRA case. . . . And if somehow you thought that shouldn't you have at least called me." [sic]

b. "I was unable to ply my trade at all for over a year behind this. You told me since we have them dead to rights it should really only be a damage hearing."

c. "We talked in early October and you said everything would be complete in two weeks. You text [sic] me on November 30<sup>th</sup>, I emailed you several times, I called 5 times a day since then and I text [sic] you too many times to count."

252. Respondent failed to keep Mr. Harden reasonably informed or promptly comply with reasonable requests for information about the status of his matter.

253. On May 3, 2021, Respondent sent Mr. Harden an email that stated in part:

a. "I spoke with the mortgage company's attorney on Friday and today about canceling the eviction."

b. "I took the FCRA case to see if I could get something to stick, maybe get you a couple thousand dollars, and to help ease your mind at the time; the case was weak, and proving damages were going to be almost impossible."

254. Respondent ceased all communication with Mr. Harden in or about May 2021.

255. Respondent failed to take any reasonably diligent action in the Trans Union Litigation which resulted in a dismissal of the matter for lack of prosecution.

**SPECIFIC RULES OF PROFESSIONAL CONDUCT AND**  
**RULE OF DISCIPLINARY ENFORCEMENT VIOLATED**

256. Respondent violated the following Rules of Professional Conduct and Pa.R.D.E.:

A. RPC 1.1, which states that a lawyer shall provide competent representation to a client. Competent representation requires the legal knowledge, skill, thoroughness and preparation reasonably necessary for the representation.

B. RPC 1.2(a), which states that subject to paragraphs (c) and (d), a lawyer shall abide by a client's decisions concerning the objectives of representation and, as required by Rule 1.4, shall consult with the client as to the means by which they are to be pursued. A lawyer may take such action on behalf of the client as is impliedly authorized to carry out the representation. A lawyer shall abide by a client's decision whether to settle a matter. In a criminal case, the lawyer shall abide by the client's decision, after consultation with the lawyer, as to a plea to be entered, whether to waive jury trial and whether the client will testify.

C. RPC 1.3, which states that a lawyer shall act with reasonable diligence and promptness in representing a client.



D. RPC 1.4(a)(2), which states that a lawyer shall reasonably consult with the client about the means by which the client's objectives are to be accomplished.

E. RPC 1.4(a)(3), which states that a lawyer shall keep the client reasonably informed about the status of the matter.

F. RPC 1.4(a)(4), which states that a lawyer shall promptly comply with reasonable requests for information.

G. RPC 1.4(b), which states that a lawyer shall explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation.

H. RPC 1.16(a)(1), which states that a lawyer shall not represent a client or, where representation has commenced shall withdraw from the representation of a client if the representation will result in a violation of the Rules of Professional Conduct or other law.

I. RPC 1.16(a)(2), which states that a lawyer shall not represent a client or, where representation has commenced, shall withdraw from the representation of a client if the lawyer's physical or mental condition materially impairs the lawyer's ability to represent the client.

J. RPC 1.16(d), which states that upon termination of representation, a lawyer shall take steps to the extent reasonably practicable to protect a

client's interests, such as giving reasonable notice to the client, allowing time for employment of other counsel, surrendering papers and property to which the client is entitled and refunding any advance payment of fee or expense that has not been earned or incurred. The lawyer may retain papers relating to the client to the extent permitted by other law.

K. RPC 3.2, which states that a lawyer shall make reasonable efforts to expedite litigation consistent with the interests of the client.

L. RPC 8.4(c), which states that it is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit or misrepresentation.

M. Pa.R.D.E. 203(b)(7), which states that "failure by a respondent-attorney without good cause to respond to Disciplinary Counsel's request or supplemental request under Disciplinary Board Rules, §87.7(b) for statement of the respondent-attorney's position" shall be grounds for discipline.

#### **SPECIFIC RECOMMENDATION FOR DISCIPLINE**

257. ODC and Respondent jointly recommend that appropriate discipline for Respondent's admitted misconduct is a suspension of two years.

258. Aggravating factors include:

- a. Respondent's misconduct caused harm to his clients, including delay and prejudice in their underlying representations.
- b. Respondent's initial lack of cooperation with ODC until after the Petition for Discipline was filed. In his SOP submitted in the Schulte Litigation matter, Patrick J. Bradley matter, Richard Greenwald matter, Samantha Sammons matter, and Joel A. Harden, Sr. matter, Respondent failed to provide requested information and failed to acknowledge his professional misconduct and the effects of such misconduct on his clients.
- c. Respondent's failure to respond to the Kenjah Hughston DB-7;
- d. Respondent's failure to answer the Petition for Discipline.

259. If this matter were to proceed to a hearing, Respondent would testify that the following are mitigating factors:

- a. Respondent has no prior history of discipline;
- b. Respondent suffers from depression and anxiety;
- c. In May 2023, Respondent attempted suicide after suffering from a severe bout of anxiety and depression;

- d. Respondent suffered from stretches of mental health issues throughout 2023 and 2024, leading him to ignore correspondences from ODC;
- e. Respondent regrets his decision to ignore ODC;
- f. Since 2018, Respondent has been in therapy and on medication;
- g. Respondent believes his mental health issues were a causal factor to his professional misconduct; and
- h. Respondent is remorseful for and embarrassed by his misconduct and understands that he should be disciplined, as is evidenced by his consent to receiving a suspension of two years.

260. Precedent establishes suspension of Respondent's license is an appropriate form of discipline due to the pattern of misconduct and the totality of the circumstances.

261. Discipline for misconduct arising out of neglect of multiple client matters supports a period of suspension requiring the attorney respondent to petition for reinstatement and establish his fitness to resume the practice of law at a reinstatement hearing. In *Office of Disciplinary Counsel v. Brian Oliver Williams*, 38 DB 2022 (D.Bd. Rpt. 3/10/2022) (S. Ct. Order 4/19/2022), Williams was suspended for one year and one day on consent for his

negligence in handling ten client matters during the course of seven months. His misconduct included failure to provide competent representation, communicate with clients, file timely pleadings, appear for court proceedings, and return client funds. Williams' lack of prior discipline was a mitigating factor. In *Office of Disciplinary Counsel v. Tangie Marie Boston*, No. 99 DB 2018 (D. Bd. Rpt. 12/10/2019) (S. Ct. Order 2/12/2020), Boston was suspended for a year and a day for misconduct in four client matters comprising incompetence, neglect, lack of communication, failure to refund unearned fees, and conduct prejudicial to the administration of justice. Boston's acceptance of responsibility and lack of prior discipline were mitigating factors.

In the matter of *Office of Disciplinary Counsel v. Sterling Artist*, No. 153 DB 2005 (D. Bd. Rpt. 4/27/2007) (S. Ct. Order 7/18/2007), the Court suspended Artist for one year and one day for neglect and incompetence; lack of communication; failure to return client files; and misrepresentation involving three client matters.

In matters resulting in suspension for more than a year and a day, the scope and nature of the misconduct was more serious than those where a year and a day was imposed, or the balance of aggravating and mitigating factors required a more severe sanction. In *Office of Disciplinary Counsel v.*

*Matthew Gerald Porsch*, No. 248 DB 2018 (D. Bd. Rpt. 2/20/2020) (S. Ct. Order 5/29/2020), Porsch was suspended for two years for his repeated acts of misconduct consisting of neglect, misrepresentation, and failure to refund unearned fees and return documents in three separate matters. His failure to respond to disciplinary authorities and prior discipline consisting of a public reprimand were aggravating factors. Porsch's failure to apologize and lack of sympathy for clients' situations were further aggravating factors.

In *Office of Disciplinary Counsel v. Robert A. Krug*, 89 DB 2014 (S. Ct. Order 12/30/14), the Court granted a Joint Petition in Support of Discipline on Consent and imposed a suspension on consent for a period of three years, where Krug neglected clients in four separate estate matters in which he accepted fees, performed some work, but then ceased to have contact with the clients. Krug had a history of discipline that included a Private Reprimand and a Public Censure, both of which involved client neglect. However, in mitigation, Krug admitted his misconduct, cooperated with Office of Disciplinary Counsel and was remorseful and embarrassed.

In *Office of Disciplinary Counsel v. Allan K. Marshall*, No. 136 DB 2019 (D. Bd. Rpt. 10/16/2020) (S. Ct. Order 2/12/2021). Marshall engaged in misconduct in three client matters, including neglect, failure to communicate, misrepresentation, and dishonesty. Marshall showed no remorse for his

misconduct. Marshall had a history of discipline consisting of a private reprimand. The Court accepted the Board's recommendation and suspended Marshall for thirty months.

In the present cases, Respondent repeatedly demonstrated a lack of diligence, competence, failure to communicate with his clients and engaged in misrepresentations over an extended period of time. In his correspondence with ODC, Respondent repeatedly denied any struggles with his mental health and initially denied any wrongdoing in these matters. Respondent failed to provide any of the client files requested by ODC, neglected to respond to the Hughston DB7 and failed to file an Answer to the Petition for Discipline. Respondent engaged in a course of misconduct spanning from 2020 through 2024.


262. Under the totality of the circumstances, ODC and Respondent respectfully submit that Respondent misconduct warrants a two-year suspension. Respondent's misconduct in these matters were further aggravated by his disregard for the disciplinary process. Respondent's conduct during ODC's investigation demonstrates that there remain substantial questions regarding Respondent's fitness to practice law and status of his mental health.

A suspension of two years would require Respondent to establish his fitness to practice law by clear and convincing evidence and will provide time for Respondent to continue his course of treatment for his anxiety and depression.

WHEREFORE, Petitioner and Respondent respectfully request that, pursuant to Pennsylvania Rules of Disciplinary Enforcement 215(e), 215(g) and 215(i), a three-member panel of the Disciplinary Board review and approve the Joint Petition in Support of Discipline on Consent and file a recommendation with the Supreme Court of Pennsylvania that Respondent receive a two-year suspension.


Respectfully submitted,  
OFFICE OF DISCIPLINARY COUNSEL  
THOMAS J. FARRELL,  
Attorney Registration No. 20955,  
Chief Disciplinary Counsel

08/13/25  
DATE

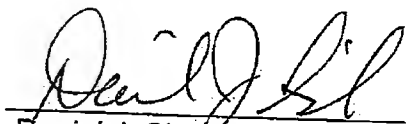
  
Jennifer Flemister  
Disciplinary Counsel  
Attorney Registration Number 326103  
Office of Disciplinary Counsel District II  
Suite 170, 820 Adams Avenue  
Trooper, PA 19403  
(610) 650-8210



8/11/25  
DATE

  
Paul S. Peters, III  
Attorney Registration Number 87421  
Respondent

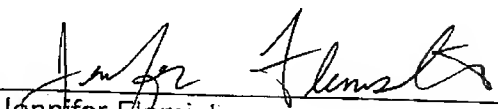
8/11/2025  
DATE

  
Daniel J. Siegel, Esquire  
Attorney Registration Number 40925  
Counsel for Respondent

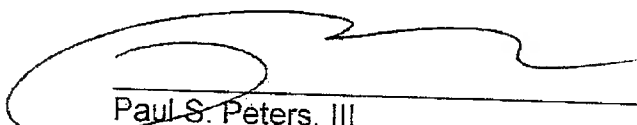
### VERIFICATION

The statements contained in the foregoing *Joint Petition In Support of Discipline on Consent Discipline* are true and correct to the best of my knowledge or information and belief and are made subject to the penalties of 18 Pa.C.S.A. §4904, relating to unsworn falsification to authorities.

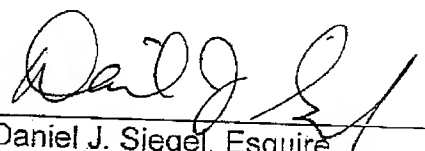
08/13/25  
DATE

  
\_\_\_\_\_  
Jennifer Flemister  
Disciplinary Counsel

8/14/25  
DATE

  
\_\_\_\_\_  
Paul S. Peters, III  
Respondent

8/16/2025  
DATE

  
\_\_\_\_\_  
Daniel J. Siegel, Esquire  
Counsel for Respondent

**BEFORE THE DISCIPLINARY BOARD OF THE  
SUPREME COURT OF PENNSYLVANIA**

OFFICE OF DISCIPLINARY COUNSEL,:	No. 44 DB 2025
Petitioner :	
v. :	
:	Attorney Reg. No. 87421
PAUL S. PETERS, III, :	
Respondent :	(Montgomery County)

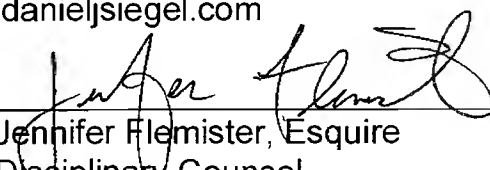
**CERTIFICATE OF SERVICE**

I hereby certify that I am this day serving the foregoing document upon all parties of record in this proceeding in accordance with the requirements of 204 Pa. Code §89.22 (relating to service by a participant).

**Email and First Class Mail, as follows:**

Daniel J. Siegel, Esquire  
Law Offices of Daniel J. Siegel, LLC  
66 West Eagle Road, Suite 1  
Havertown, PA 19083-1425  
Dan@danieljsiegel.com

Dated: 08/13/25

  
\_\_\_\_\_  
Jennifer Flemister, Esquire  
Disciplinary Counsel  
Attorney Registration No. 326103  
Office of Disciplinary Counsel District II  
820 Adams Avenue, Suite 170  
Trooper, PA 19403  
(610) 650- 8210

BEFORE THE DISCIPLINARY BOARD OF THE  
SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, :	No. 44 DB 2025
Petitioner :	
v. :	
:	Attorney Reg. No. 87421
PAUL S. PETERS, III, :	
Respondent :	(Montgomery County)

AFFIDAVIT  
UNDER RULE 215(d), Pa.R.D.E.

COMMONWEALTH OF PENNSYLVANIA:  
COUNTY OF MONTGOMERY:

Paul S. Peters, III, being duly sworn according to law, deposes and hereby submits this affidavit consenting to the recommendation of a two-year suspension in conformity with Pa.R.D.E. 215(d) and further states as follows:

1. He is an attorney admitted in the Commonwealth of Pennsylvania, having been admitted to the bar on or about October 25, 2001.
2. He desires to submit a Joint Petition in Support of Discipline on Consent Pursuant to Pa.R.D.E. 215(d).
3. His consent is freely and voluntarily rendered; he is not being subjected to coercion or duress, and he is fully aware of the implications of submitting this affidavit.

4. He is aware that there is presently pending a proceeding into allegations that he has been guilty of misconduct as set forth in the Joint Petition in Support of Discipline on Consent Pursuant to Pa.R.D.E. 215(d) to which this affidavit is attached.

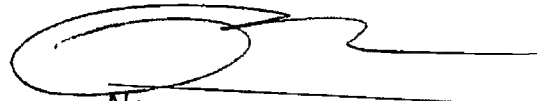
5. He acknowledges that the material facts set forth in the Joint Petition are true.

6. He submits the within affidavit because he knows that if charges predicated upon the matter under investigation were filed, or continued to be prosecuted in the pending proceeding, he could not successfully defend against them.

7. He acknowledges that he is fully aware of his right to consult and employ counsel to represent him in the instant proceeding. He has retained, consulted and acted upon the advice of counsel, in connection with his decision to execute the within Joint Petition.

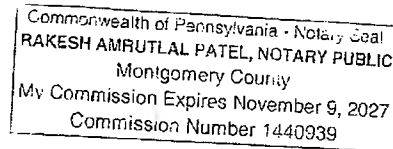
It is understood that the statements made herein are subject to the penalties of 18 Pa.C.S.A. §4904 (relating to unsworn falsification to authorities).

Signed this 11 day of August, 202<sup>5</sup><sup>\*\*\*</sup>.

  
Name

PA, Montgomery  
Sworn to and subscribed  
before me this 11<sup>th</sup> day  
of August, 202<sup>5</sup><sup>\*\*\*</sup> 2025


  
Notary Public



### CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Office of Disciplinary Counsel

Signature: 

Name: Jennifer T. Flemister, Esq.

Attorney No. (if applicable): 326103