



## **I. Statement of the Nature of the Matter**

This matter was initiated by a self-report made by Respondent. Respondent admitted that she submitted a false resume and made false statements on her application to the Georgetown University Law Center's ("Georgetown Law") Masters of Law in Taxation ("Tax LL.M.") program. Following her admission to the program, Respondent submitted a false resume and altered transcripts inflating her grades and grade point averages to potential employers as part of Georgetown Law's Taxation Interview Program ("TIP"). Respondent's dishonesty was discovered by Georgetown Law and Respondent entered into a Consent Disposition with Georgetown Law which required her to report her misconduct to her employer and the Office of Disciplinary Counsel.

## **II. Stipulation of Facts and Charges**

The conduct and standards that Respondent stipulates to are as follows:

1. In May 2018, Respondent graduated from the University of North Carolina School of Law ("UNC Law") and obtained a juris doctorate.
2. Respondent's final grade point average from UNC Law was 3.300.
3. In May 2024, Respondent applied to Georgetown Law for admission in its Tax LL.M. program.
4. As part of her application, Respondent submitted a resume that falsely claimed that her GPA from UNC Law was 3.4, along with an official transcript that

correctly stated her GPA as 3.3.

5. Respondent also falsely claimed on her application that she had received merit certificates at UNC LAW for courses in torts and evidence, when she had not.

6. Respondent was accepted into Georgetown Law's Tax LL.M. program.

7. During her first term, Respondent received an F in the course on Tax of Property Transactions, which was an administrative grade based on Respondent's technical failure to submit her exam, which she had completed.

8. Following her first term, Respondent applied for employment at several law firms through Georgetown Law and New York University School of Law's joint TIP.

9. As part of her TIP application, Respondent submitted an altered transcript of her grades for the LL.M. program.

10. On the altered Georgetown Law transcript, Respondent changed the F she received in Tax of Property Transactions to an A.<sup>1</sup> She also changed a B+ in Taxation of Partnerships to an A- and a B+ in U.S. International Inbound Tax to an A-. These alterations changed her GPA from 2.72 to 3.44.

11. As part of her TIP application, Respondent also submitted an altered transcript of her grades from UNC Law.

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<sup>1</sup> Respondent later successfully petitioned Georgetown Law's Registrar to change the F grade to a Withdrawal due to administrative error, which resulted in a GPA of 3.24.

12. On the altered UNC Law transcript, Respondent changed her GPA from 3.30 to 3.53 and raised her grades in nine courses.

13. As part of her TIP application, Respondent also submitted a resume that falsely claimed that her Georgetown Law GPA was 3.44 and that her UNC Law GPA was 3.53.

14. The TIP resume also included the same false claim that she had received merit certificates at UNC LAW for course in torts and evidence. See ¶ 5 above.

15. Respondent submitted her TIP application with the false documents to 21 potential employers, including Morrison & Foerster.

16. Morrison & Foerster offered Respondent employment based on the false TIP application.

17. Administrators for Georgetown Law's LL.M. program discovered that Respondent had made false statements in her resume and referred her to Georgetown Law's Ethics Counsel.

18. Following an investigation, Respondent entered into a Consent Disposition with Georgetown Law.

19. In the May 2025 Consent Disposition, Respondent admitted that she submitted a false resume and altered transcripts as part of her TIP application and that she made false statements when applying to Georgetown Law's LL.M. program.

20. As a sanction for her misconduct, Respondent agreed that

- her LL.M. degree be withheld for one full academic year,
- her Georgetown Law transcript would contain a notation disclosing her misconduct,
- she would disclose the false statements in her application to Morrison & Foerster, and
- she would report her misconduct to the Office of Disciplinary Counsel.

21. On May 9, 2025, Respondent submitted a letter to Morrison & Foerster disclosing the false statements in her application and resigning from her position.

22. On May 27, 2025, Respondent reported her misconduct to the Office of Disciplinary Counsel.

23. Respondent's conduct violated the following District of Columbia Rule of Professional Conduct:

- a. Rule 8.4(c) in that Respondent engaged in conduct involving dishonesty.

### **III. Statement of Promises**

Disciplinary Counsel has not made any promises regarding the underlying matter other than to recommend the sanction set forth in this negotiated disposition.

#### **IV. The Agreed-Upon Sanction**

##### **A. Agreed Sanction**

Respondent and Disciplinary Counsel have agreed that the appropriate sanction for the stipulated misconduct and Rule violations in this matter is a one-year suspension, with nine months stayed in favor of probation, beginning on the date on which the Court issues the order sanctioning Respondent and ending one-year after Respondent has served the three-month served suspension. The staying of a portion of the sanction is conditioned upon Respondent not engaging in any misconduct in this or any other jurisdiction during the probation period. If Disciplinary Counsel has probable cause to believe that Respondent has engaged in any misconduct, Disciplinary Counsel may request that Respondent be required to serve the remainder of the suspension previously stayed herein. The order shall include a requirement that Respondent notify any clients of the suspension and probationary period.

##### **B. Relevant Precedent**

As set forth below, the agreed-upon sanction in this matter is justified and not unduly lenient given the range of sanctions in cases involving dishonesty, as well as the mitigating factors present. Cases involving violations of Rule 8.4(c) have resulted in sanctions ranging from Informal Admonitions to disbarment. *See In re Baber*, 106 A.3d 1072 (D.C. 2015) (disbarment for flagrant dishonesty at expense of client's interest plus

other violations); *In re Hutchinson*, 534 A.2d 919 (D.C. 1987) (one year suspension for lying to SEC); *In re Chisholm*, 679 A.2d 495 (D.C. 1996) (six-months suspension, plus fitness, for persistent and extensive dishonesty plus neglect); *In re Schoeneman*, 891 A.2d 279 (D.C. 2006) (four-month suspension for lying to clients about status of their case plus other violations); *In re Schneider*, 553 A.2d 206 (D.C. 1989) (30-day suspension for false expense vouchers); *In re Heiser*, Bar Docket No. 2012-D110 (ODC Nov. 8, 2013) (informal admonition for false certification by lapsed bar member that she was still active member).

Cases specifically involving dishonesty in an application context generally result in a served suspension between one month and a year. *See In re Hawn*, 917 A.2d 693 (D.C. 2007) (30-day suspension for falsifying resume and altering law school transcripts in an attempt to obtain legal employment); *In re Jenkins*, 298 A.3d 293 (D.C. 2023) (30-day suspension for concealing prior discipline, employment, and bar membership when applying for job); *In re Rosen*, 570 A.2d 728 (D.C. 1989) (nine-month suspension with fitness for recklessly misrepresenting facts on application for admission to the Maryland bar); *In re Thomas-Bellamy*, 125 A.3d 1136 (D.C. 2015) (one-year suspension for false statements in D.C. Bar application); *In re Powell*, 898 A.2d 365, 365 (D.C. 2006) (one-year suspension with fitness for false statements on application for admission to federal district court bar).

**C. Mitigating Circumstances**

The following mitigating factors were considered in recommending the sanction in this matter: (a) Respondent has no prior discipline; (b) Respondent has taken full responsibility for her misconduct and has demonstrated remorse; and (c) Respondent has fully cooperated with Disciplinary Counsel.

**D. Justification of Recommended Sanction**

The recommended sanction of a one-year suspension with nine months stayed in favor of probation is justified because it falls within the range of discipline for 8.4(c) violations and specifically dishonesty in an application context. Respondent's lack of prior discipline distinguishes her case from those with the most severe sanctions and avoids the necessity of a fitness requirement. On the other hand, Respondent's pattern of dishonesty, lying in her applications to both Georgetown Law and to potential employers, distinguishes her cases from those on the low end of the range. In light of the mitigating factors and the recommended period of probation, which could lead to a significantly longer suspension if Respondent were to engage in further misconduct, the recommended sanction is not unduly lenient.

**WHEREFORE**, the Office of Disciplinary Counsel requests that the Executive Attorney assign a Hearing Committee to review the petition for negotiated disposition pursuant to D.C. Bar Rule XI, § 12.1(c).

Respectfully submitted,

*Hamilton P. Fox, III*

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Hamilton P. Fox, III  
Disciplinary Counsel  
Bar Number: 113050

*Kemper B. Warren*

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Kemper B. Warren, Esquire  
Respondent  
Bar Number: 1617183

*Hendrik deBoer*

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Hendrik deBoer  
Assistant Disciplinary Counsel  
Bar Number: 1028844

OFFICE OF DISCIPLINARY COUNSEL  
515 5<sup>th</sup> Street, N.W. Building  
A, Room 117 Washington,  
D.C. 20001  
Telephone: (202) 638-1501