

THIS REPORT IS NOT A FINAL ORDER OF DISCIPLINE*

DISTRICT OF COLUMBIA COURT OF APPEALS
BOARD ON PROFESSIONAL RESPONSIBILITY
AD HOC HEARING COMMITTEE



FILED

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In the Matter of: :
 :
 JOHN T. SALATTI, : Board on Professional Responsibility
 :
 Respondent. : Board Docket No. 25-ND-002
 : Disciplinary Docket No. 2023-D169
 :
 A Member of the Bar of the :
 District of Columbia Court of Appeals :
 (Bar Registration No. 503247) :

REPORT AND RECOMMENDATION OF
THE AD HOC HEARING COMMITTEE

APPROVING THE AMENDED PETITION FOR NEGOTIATED DISCIPLINE

I. PROCEDURAL HISTORY

This matter came before The Ad Hoc Hearing Committee on January 7, 2026, for a limited hearing on an Amended Petition for Negotiated Discipline (the “Amended Petition”). The members of the Hearing Committee are Rebecca C. Smith, Esquire, Chair; Cecilia Carter Monahan, Public Member; and Eric Gibson, Esquire, Attorney Member. The Office of Disciplinary Counsel was represented by Assistant Disciplinary Counsel Dru M. Foster, Esquire. Respondent, John T. Salatti, Esquire (hereinafter “Salatti” or “Respondent”), appeared *pro se*.

* Consult the ‘Disciplinary Decisions’ tab on the Board on Professional Responsibility’s website (www.dcattorneydiscipline.org) to view any subsequent decisions in this case.

The Hearing Committee has carefully considered the Amended Petition signed by Disciplinary Counsel and Respondent, the supporting Amended Affidavit of Negotiated Disposition submitted by Respondent (the “Affidavit”), and the representations during the limited hearing made by Respondent and Disciplinary Counsel. The Hearing Committee also has fully considered the Chair’s *in camera* review of Disciplinary Counsel’s files and records, *ex parte* communications with Disciplinary Counsel, and the Confidential Memo prepared by Disciplinary Counsel. *See* Confidential Appendix. For the reasons set forth below, the Hearing Committee finds that the negotiated discipline of a fully stayed 30-day suspension and unsupervised twelve-month probation with conditions, to commence upon approval by the D.C. Court of Appeals, is justified and recommends that it be imposed by the Court.

II. FINDINGS PURSUANT TO D.C. BAR R. XI, § 12.1(c)
AND BOARD RULE 17.5

The Hearing Committee, after full and careful consideration, finds that:

1. The Amended Petition and Affidavit are full, complete, and in proper order.
2. Respondent is aware that there is currently pending against him an investigation involving allegations of misconduct, the nature of which are set forth in the Amended Petition. Tr. 19¹; Amended Affidavit ¶ 2.

¹ “Tr.” refers to the transcript of the limited hearing held on January 7, 2026.

3. The allegations that were brought to the attention of Disciplinary Counsel are that Respondent's conduct violated D.C. Rules of Professional Conduct 1.4(a) and (b) (failing to keep client reasonably informed and failing to explain matter), 1.8(e) (accepting compensation from a third-party for the representation without obtaining client's consent), 1.5(b) (failing to communicate the rate and basis of a fee and scope of the representation in writing), and 5.5(b) (assisting non-attorneys and paralegals in the unauthorized practice of law). Amended Petition at 5.

4. Respondent has freely and voluntarily acknowledged that the material facts and misconduct reflected in the Amended Petition are true. Tr. 20; Amended Affidavit ¶¶ 4, 6. Specifically, Respondent acknowledges that

1. Salatti was admitted to the D.C. Bar on March 5, 2007, and assigned Bar Number 503247. Salatti is also admitted to practice in Georgia. Salatti joined the law firm Remus Enterprises Law Group, LLC, which was founded by Solon Phillips[, Esquire]. As of May 2025, Salatti is listed as a partner on the firm website. Salatti also practices under his own firm name, The Law Offices of John Salatti.

2. In January 2023, Salatti agreed to represent an immigration client through a company called Visa to America. Visa to America advertises itself as a full-service immigration network firm composed of experienced immigration attorneys, financial advisors, and legal experts. Joseph Barr and Bob Babanian, both non-lawyers,

are the principles [sic] of Visa to America. Although they are not lawyers, Barr and Babanian both provide legal services to Visa to America clients.

3. Yoni Nasi, an Israeli citizen, contacted Visa to America to assist him in obtaining an E-2 investor visa. An E-2 visa allows an individual to enter and work in the United States based on an investment in a U.S. business. Nasi had a real estate development company in Israel and hoped to start a property management company in the United States. Visa to America sent Nasi an invoice for \$8,000.00 for services related to his E-2 visa application. At the bottom of the invoice there was a note that read, “this amount does not include the Legal fees that will need to be paid to the attorney Solon Phillips in DC or any other attorney that is assigned on the case, (\$4,000).” Phillips was not ultimately assigned to the case, but Salatti was.

4. Visa to America and paralegals from Remus Enterprises Law Group prepared Nasi’s request for E-2 Investor Status and submitted it to U.S. Customs and Immigration Services (“USCIS”). Although he did not prepare any of the materials that were part of the request, Salatti signed the cover letter, a form entering his appearance, a form requesting “Premium Processing,” and the petition itself.

5. A few weeks after the petition was submitted, USCIS sent Salatti a request for evidence (“RFE”) to support Nasi’s petition. Barr

saw the request on the online docket and asked Salatti to send it to Visa to America to prepare the reply. Visa to America then prepared the response, and, on May 8, 2023, Barr sent Salatti an email with the subject, “Hi John I need you to sign this ASAP,” and attached the cover letter for the RFE response. Salatti responded on the same day, writing, “Because time is of the essence, I have signed the letter and have just given it a cursory read through for typos, punctuation, proofing errors.” The next day, Visa to America submitted a response to the RFE, which included a cover letter signed by Salatti.

6. On May 11, 2023, Salatti received an email notification that Nasi’s I-129 Petition for Nonimmigrant Work was approved. Salatti forwarded the email to Barr and Phillips, letting them know about the approval. Phillips responded, “I think you should forward this to Yoni too.” Salatti asked Barr if he had any comment, and Barr replied, “I texted him and he is very aware that his case was approved I provided him the confirmation we will wait for the original once it [has] arrived you can withdraw your representation as we are done.” Salatti did not forward the email to Nasi.

7. On June 5, 2023, Salatti sent Nasi a termination letter. Salatti wrote, “I write to congratulate you on receiving approval for your E-2 visa. With that outcome, the services that Visa to America and I agreed to perform for you have come to a close. Joseph has sent you

your file and thus all our obligations to you have ended. This letter is formal notice to you that our work is complete and our professional relationship has ended.” Despite the reference to “services ... I agreed to perform,” in his termination letter, Salatti had never entered into a written fee agreement with Nasi setting forth the basis for his fee or the scope of his representation; and, in fact, never communicated with Nasi during the representation. Barr paid Salatti \$1,000 for his work on Nasi’s case.

8. Salatti’s conduct violated the following D.C. Rules of Professional Conduct:

a. Rule 1.4(a) and (b), in that Salatti failed to keep Nasi reasonably informed about the status of the matter and failed to explain the matter to the extent reasonably necessary for Nasi to make informed decisions about the representation;

b. Rule 1.8(e), in that Salatti accepted compensation from Visa to America for representing Nasi without obtaining Nasi’s informed consent;

c. Rule 1.5(b), in that Salatti failed to communicate the rate and basis of his fee and the scope of representation in writing to Nasi; and

d. Rule 5.5(b), in that Salatti assisted non-attorneys and paralegals in the unauthorized practice of law.

Amended Petition at 2-5 (“II. Stipulation of Facts and Charges”).

5. Respondent is agreeing to the disposition because Respondent believes that he cannot successfully defend against discipline based on the stipulated misconduct. Tr. 18-19; Amended Affidavit ¶ 5.

6. Disciplinary Counsel has made no promises to Respondent other than what is contained in the Amended Petition. Amended Affidavit ¶ 7. Those promises are not to pursue any charges arising out of the stipulated conduct other than those charges agreed to and not to pursue any sanction other than that set forth in the Amended Petition. Amended Petition at 5. Respondent confirmed during the limited hearing that there have been no other promises or inducements other than those set forth in the Amended Petition. Tr. 24.

7. Respondent is aware of his right to confer with counsel and is proceeding *pro se*. Tr. 12; Amended Affidavit ¶ 1.

8. Respondent has freely and voluntarily acknowledged the facts and misconduct reflected in the Amended Petition and agreed to the sanction set forth therein. Tr. 22-24; Amended Affidavit ¶¶ 4, 6.

9. Respondent is not being subjected to coercion or duress. Tr. 24; Amended Affidavit ¶ 6.

10. Respondent is competent and was not under the influence of any substance or medication that would affect his ability to make informed decisions at the limited hearing. Tr. 13.

11. Respondent is fully aware of the implications of the disposition being entered into, including, but not limited to, the following:

- a) he has the right to consult with counsel prior to entering this negotiated disposition;
- b) he will waive his right to cross-examine adverse witnesses and to compel witnesses to appear on his behalf;
- c) he will waive his right to have Disciplinary Counsel prove each and every charge by clear and convincing evidence;
- d) he will waive his right to file exceptions to reports and recommendations filed with the Board and with the Court;
- e) the negotiated disposition, if approved, may affect his present and future ability to practice law;
- f) the negotiated disposition, if approved, may affect his bar memberships in other jurisdictions; and
- g) any sworn statement by Respondent in his affidavit or any statements made by Respondent during the proceeding may be used to impeach his testimony if there is a subsequent hearing on the merits.

Tr. 12, 15-18; Amended Affidavit ¶¶ 1, 9, 10, 12.

12. Respondent and Disciplinary Counsel have agreed that the sanction in this matter should be a suspension from the practice of law for thirty days, fully stayed, on the condition that he be placed on unsupervised probation for a period of twelve months, to commence upon the approval of the D.C. Court of Appeals. Amended Petition at 5-6; Tr. 22.

During the period of probation, Respondent shall comply with the following terms:

a) Within 60 days of the Court's order approving the disposition, Respondent shall complete two continuing legal education (CLE) courses: Avoiding Malpractice and Bar Complaints 2025 and Avoiding the Unauthorized Practice of Law 2025. He will provide proof of completion to Disciplinary Counsel.

b) He shall not be found to have engaged in any unethical conduct before the probationary period expires.

c) During the twelve-month probation, Respondent shall inform all clients he represents (current and new clients), in writing or through the necessary engagement agreement, that he is serving a term of probation. Tr. 7-8.

If Respondent fails to comply with the terms of his probation, his probation may be revoked and he may be required to serve the thirty-day suspension, consecutively with any other discipline or suspension that may be imposed in the event of a finding that he engaged in further unethical conduct. Tr. 23-24.²

13. The parties have provided the following statement demonstrating the following circumstances in mitigation, which the Hearing Committee has taken into consideration:

Mitigating circumstances include that Salatti: 1) did not previously represent (before Nasi), nor does he regularly represent, clients through Visa to America; 2) has no prior disciplinary history; 3) has cooperated

² If his probation is revoked and Respondent is required to serve the previously stayed thirty-day suspension, a D.C. Bar Rule XI, section 14(g) affidavit must be filed in order for the suspension period to be deemed effective.

with Disciplinary Counsel; 4) has accepted responsibility for his misconduct; and 5) acknowledges that if he were to represent any clients through Visa to America (or any other referral service) he must enter into his own fee agreement with the client, have sufficient communication with the client to ensure the client understands the matter, review all matters for accuracy and sufficiency, and bear responsibility for all legal work and the proper handling of any advances for fees and expenses.

Amended Petition at 7-8.

15. The complainant was notified of the limited hearing but did not appear and did not provide any written comment. Tr. 10.

III. DISCUSSION

The Hearing Committee shall recommend approval of a petition for negotiated discipline if it finds:

- (1) The attorney has knowingly and voluntarily acknowledged the facts and misconduct reflected in the petition and agreed to the sanction set forth therein;
- (2) The facts set forth in the petition or as shown at the hearing support the admission of misconduct and the agreed upon sanction; and
- (3) The sanction agreed upon is justified. . . .

D.C. Bar R. XI, § 12.1(c)(1)-(3); *see also* Board Rule 17.5(a)(i)-(iii).

A. Respondent Has Knowingly and Voluntarily Acknowledged the Facts and Misconduct and Agreed to the Stipulated Sanction.

The Hearing Committee finds that Respondent has knowingly and voluntarily acknowledged the facts and misconduct reflected in the Amended Petition and agreed to the sanction therein. Respondent, after being placed under oath, admitted the stipulated facts and charges set forth in the Amended Petition, and denied that

he is under duress or has been coerced into entering into this disposition. *See supra* Paragraphs 8-9. Respondent understands the implications and consequences of entering into this negotiated discipline. *See supra* Paragraph 11.

Respondent has acknowledged that any and all promises that have been made to him by Disciplinary Counsel as part of this negotiated discipline are set forth in writing in the Amended Petition and that there are no other promises or inducements that have been made to him. *See supra* Paragraph 6.

B. The Stipulated Facts Support the Admissions of Misconduct and the Agreed-Upon Sanction.

The Hearing Committee has carefully reviewed the facts set forth in the Amended Petition and established during the hearing and concludes that they support the admission of misconduct and the agreed-upon sanction. Moreover, Respondent is agreeing to this negotiated discipline because he believes that he could not successfully defend against the misconduct described in the Amended Petition. *See supra* Paragraph 5.

The Amended Petition states that Respondent violated **Rule 1.4(a)** (failing to keep client reasonably informed about the status of the matter) **and (b)** (failing to explain the matter to the extent reasonably necessary for the client to make informed decisions about the representation). The evidence supports Respondent's admission that he violated Rules 1.4(a) and (b) in that the stipulated facts describe how Respondent did not communicate with the client directly, but allowed Mr. Barr, a non-lawyer who was a principal of Visa to America, to notify the client about the status of the I-129 Petition, and Respondent failed to forward the email notification

about the I-129 Petition's approval to the client despite Mr. Phillips suggestion that he do so. *See supra* Stipulated Fact ¶¶ 2, 6. During the representation, in fact, Respondent never communicated with the client except when sending him a termination letter. *See* Stipulated Fact ¶ 7.

The evidence also supports Respondent's admission that he violated **Rule 1.8(e)** (accepting compensation for representing a client from one other than the client without the client's informed consent) in that the stipulated facts describe how Mr. Barr paid Respondent his \$1,000 fee and how Visa to America's invoice for \$8,000 did not show the client's informed consent to the payment arrangement. *See* Stipulated Fact ¶¶ 3, 7.

The evidence also supports Respondent's admission that he violated **Rule 1.5(b)** (written fee agreement) in that the stipulated facts support a finding that Respondent did not ever communicate the rate or basis of his fee and the scope of the representation in writing with the client. In fact, the first time he communicated with the client was when he sent a termination letter which referred to services performed. *See* Stipulated Fact ¶ 7.

Finally, the evidence also supports Respondent's admission that he violated **Rule 5.5(b)** (assisting person who is not a member of the bar in an activity that constitutes the unauthorized practice of law) in that the stipulated facts support a finding that Respondent permitted Mr. Barr, who is not a lawyer, and paralegals at Visa to America and Remus Enterprises Law Group to prepare the legal documents, specifically Mr. Nasi's petition for E-2 Investor Status and a subsequent response to

a Request for Evidence to support the petition. Stipulated Fact ¶¶ 2, 4-5. Mr. Salatti did not prepare any of these materials and did not review them for substance, but submitted a form entering his appearance, a form requesting premium processing, signed the E-2 petition, and signed cover letters accompanying the legal documents. *See* Stipulated Fact ¶¶ 2, 4-5. In doing so he assisted Mr. Barr and paralegals in the unauthorized practice of law.

C. The Agreed-Upon Sanction Is Justified.

The third factor the Hearing Committee must consider is whether the sanction agreed upon is justified. *See* D.C. Bar R. XI, § 12.1(c); Board Rule 17.5(a)(iii) (explaining that hearing committees should consider “the record as a whole, including the nature of the misconduct, any charges or investigations that Disciplinary Counsel has agreed not to pursue, the strengths or weaknesses of Disciplinary Counsel’s evidence, any circumstances in aggravation and mitigation (including respondent’s cooperation with Disciplinary Counsel and acceptance of responsibility), and relevant precedent”); *In re Johnson*, 984 A.2d 176, 181 (D.C. 2009) (per curiam) (providing that a negotiated sanction may not be “unduly lenient”). Based on the record as a whole, including the stipulated circumstances in mitigation, the Hearing Committee Chair’s *in camera* review of Disciplinary Counsel’s investigative file and *ex parte* discussions with Disciplinary Counsel, and the Committee’s review of relevant precedent, the Hearing Committee concludes that the agreed-upon sanction is justified and not unduly lenient, for the following reasons:

This matter arises out of Mr. Salatti's representation of a single client, Mr. Nasi. The charges—failing to communicate, failing to provide a written fee agreement, accepting compensation from Visa to America without informed consent, and assisting a person in the unauthorized practice of law—arise from this one representation. From the outset, Mr. Salatti deferred to Visa to America (non-lawyers) to handle the matter. He failed to grasp his independent and fundamental responsibilities as the lawyer representing Mr. Nasi: to formalize their retention and provide him a fee agreement, to obtain informed consent for compensation from one other than the client, to communicate with him about the status of the matter and respond to his inquiries, and to review the substance of the filings for accuracy and legal sufficiency.

Based on Hearing Committee Chair's *in camera* review of the investigative file and *ex parte* discussions with Disciplinary Counsel, the Hearing Committee considered whether additional charges could be pursued. Consideration of those issues was reflected in Disciplinary Counsel's Confidential Memorandum. *See* Confidential Appendix. The Committee is satisfied that the record as developed does not support additional charges.

The typical sanction for cases involving assistance in the unauthorized practice of law, failure to communicate, third-party compensation without informed consent, and failure to provide a written fee agreement ranges from informal admonition to a short suspension. *See In re Hornal*, Bar Docket No. 2015-D292 (June 29, 2016) (informal admonition of senior partner of the law firm for violations

of Rules 5.5(b) and 7.1(a) in which nonlawyer sent a letter on behalf of the firm threatening legal action.); *In re Schwartz*, 221 A.3d 925 (D.C. 2019) (per curiam) (informal admonition for violation of Rule 1.4(a)); *In re Zieleniewski*, Disciplinary Docket No. 2020-D002 (April 25, 2023) (informal admonition for violations of Rules 1.5(b) and 1.8(e)); *In re Huang*, Disciplinary Docket No. 2017-D188, (March 5, 2018) (informal admonition for violations of Rules 1.1, 1.3(a), 1.4(a), 1.4(b), 1.5(b) and 1.16(d)); *In re Osemene*, 277 A.3d 1271 (D.C. 2022) (per curiam) (censure for violations of Rules 1.5(b) and 1.6(a) and engaging in dishonesty during disciplinary proceedings); *In re Francis*, 137 A.3d 187, 189, 193 (D.C. 2016) (per curiam) (thirty-day suspension fully stayed in favor of six-month probation for violations of Rules 1.3(b) and 1.4); *see also In re Zentz*, 891 A.2d 277, 278 n.2 (D.C. 2006) (per curiam) (commenting on a Rule 5.5(b) violation, “violations of the unauthorized practice rule, without more, normally justify the sanction of at most a public reprimand, *see, e.g., In re Kennedy*, 542 A.2d 1225 (D.C. 1988)”).

As reflected in the Mitigating Factors, prior to representing Mr. Nasi, Mr. Salatti had not previously represented any clients, nor does he regularly represent clients through Visa to America. *See* Amended Petition, Mitigating Factors, at 7-8. Further, Mr. Salatti does not have any prior disciplinary history. *Id.* His representation of Mr. Nasi and his misconduct in that representation appear to be an isolated instance. Mr. Salatti cooperated in the investigation and assumed responsibility for his conduct. *Id.*

While the facts of this case are distinct from the cited cases, a thirty-day suspension, fully stayed on the condition that Mr. Salatti be placed on unsupervised probation for a period of twelve months, is within the range of sanctions previously ordered by the Court for similar misconduct. The requirement that Mr. Salatti complete two continuing legal education courses: Avoiding Malpractice and Avoiding the Unauthorized Practice of Law, should reinforce his understanding of his fundamental responsibilities as a lawyer and prevent this sort of misconduct in the future. Considering the record as a whole, the agreed sanction is justified and not unduly lenient.

IV. CONCLUSION AND RECOMMENDATION

For the reasons stated above, it is the recommendation of this Hearing Committee that the negotiated discipline be approved and that the Court should impose a sanction of a thirty-day suspension, fully stayed, on the condition that Respondent be placed on unsupervised probation for a period of twelve months, to commence upon the approval of the negotiated discipline by the D.C. Court of Appeals.

During the period of probation, Respondent shall comply with the following terms:

- a) Within 60 days of the Court's order approving the disposition, Respondent shall complete two continuing legal education (CLE) courses: Avoiding Malpractice and Bar Complaints 2025 and Avoiding the Unauthorized Practice of Law 2025. He will provide proof of completion to Disciplinary Counsel.
- b) He shall not be found to have engaged in any unethical conduct before the probationary period expires.

c) During the twelve-month probation, Respondent shall inform all clients he represents (current and new clients), in writing or through the necessary engagement agreement, that he is serving a term of probation.

If Respondent fails to comply with the terms of his probation, his probation may be revoked and he may be required to serve the thirty-day suspension, consecutively with any other discipline or suspension that may be imposed in the event of a finding that he engaged in further unethical conduct.

AD HOC HEARING COMMITTEE



Rebecca C. Smith, Esquire
Chair



Cecilia Carter Monahan
Public Member



Eric Gibson, Esquire
Attorney Member