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

In the Matter of:	:	
	:	
SHARON STYLES ANDERSON,	:	
	:	Board Docket No. 17-ND-010
Respondent.	:	Bar Docket Nos. 2015-D315,
	:	2015-D325, 2015-D337, &
A Member of the Bar of the	:	2016-D132
District of Columbia Court of Appeals	:	
(Bar Registration No. 412158)	:	

REPORT AND RECOMMENDATION OF THE AD HOC HEARING COMMITTEE APPROVING PETITION FOR NEGOTIATED DISCIPLINE

I. PROCEDURAL HISTORY

This matter came before the Ad Hoc Hearing Committee (the "Hearing Committee") on February 12, 2018, for a limited hearing on an Amended Petition for Negotiated Discipline (the "Petition"). The members of the Hearing Committee are Edward Baldwin, Esquire, Chair; Dr. Robin J. Bell, Public Member; and Arlus J. Stephens, Esquire, Attorney Member. The Office of Disciplinary Counsel was represented by Deputy Disciplinary Counsel Elizabeth A. Herman, Esquire. Respondent, Sharon Styles Anderson, was represented by Lita T. Rosario, Esquire.

The Hearing Committee has carefully considered the Amended Petition for Negotiated Discipline signed by Disciplinary Counsel, Respondent, and Respondent's counsel, the supporting Affidavit submitted by Respondent (the "Affidavit"), the representations during the limited hearing made by Respondent,

Respondent's counsel, and Disciplinary Counsel, and the testimony of Ms. Virna Daniels, the complainant in Docket No. 2016-D132 (dismissed as part of the agreement), which was taken pursuant to Board Rule 17.4(a) (permitting the Hearing Committee to consider the complainant's statements). The Hearing Committee also has fully considered its *in camera* review of Disciplinary Counsel's files and records, and its *ex parte* communications with Disciplinary Counsel. For the reasons set forth below, we approve the Petition, find the negotiated discipline of a one-year suspension with a fitness requirement and restitution is justified, and recommend 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 Petition and Affidavit are full, complete, and in proper order.

2. Respondent is aware that there is currently pending against her an investigation into allegations of misconduct. Tr. 20;[1] Affidavit ¶ 2.

3. The allegations that were brought to the attention of Disciplinary Counsel are that Respondent violated Rules 1.1(a) (competent representation), 1.1(b) (skill and care), 1.3(a) (diligence and zeal), 1.3(c) (reasonable promptness), 1.4(a) (failure to keep client reasonably informed), 1.4(b) (failure to explain matter to client), 1.16(d) (termination of representation), 5.5(a) (unauthorized practice of law), 8.1(b) (failure to respond to lawful demand for information from disciplinary authority), 8.4(c) (dishonesty), and 8.4(d) (serious interference with the

[1] "Tr." Refers to the transcript of the limited hearing held on February 12, 2018.

administration of justice), as well as D.C. Bar Rule XI, § 2(b)(3) (failure to comply with an order of the Board). Petition at 4-6.

4. Respondent has freely and voluntarily acknowledged that the material facts and misconduct reflected in the Petition are true. Tr. 20-21; Affidavit ¶ 4. Specifically, Respondent acknowledges:

> (a) Count I (2015-D315): On or around December 2012 or January 2013, Kevin Weaver retained Respondent to represent him in a criminal case brought in the Superior Court of the District of Columbia, *United States v. Kevin Weaver*, Crim. No. 2012-CMD-21781. Mr. Weaver was charged with misdemeanor assault on a police officer. Mr. Weaver paid Respondent in cash for the representation. On November 18, 2013, Mr. Weaver was found not guilty by the court following a bench trial. On or about February 21, 2015, Respondent filed a civil complaint in the United States District Court for the District of Columbia on Mr. Weaver's behalf. The case was styled, *Weaver v. D.C. Metropolitan Police Department et al.*, 1:15-cv-00258. Mr. Weaver paid Respondent $2,900 in cash as a retainer for the federal civil case. Respondent failed to serve the defendants or [ ] provide proof of service or request additional time to do so. On September 9, 2015, the court dismissed the case for failure to provide proof of service. Respondent failed to inform her client, Mr. Weaver, of the case's dismissal. Sometime after September 9, 2015, Mr. Weaver on his own, discovered that the court had dismissed the case. When Mr. Weaver confronted Respondent with this information, she agreed that the case had been dismissed and offered to re-file the case. Before Respondent re-filed the case, she terminated the attorney/client relationship with Mr. Weaver. However, Respondent failed to refund any of the retainer fee paid to her. Petition ¶¶ 1-7.
>
> (b) Count II (2015-D337): In 2015, Respondent represented James Morrison, who sought a divorce from his wife in the State of Maryland. On April 30, 2015, the District Court for Prince George's County, Maryland imposed a "no contact" order against Mr. Morrison as to his wife and it remained in effect until May 7, 2016. Respondent is not licensed to practice law in the State of Maryland. Between June 2015 and December 2015, Respondent held herself out as able to practice law in Maryland to opposing counsel during the time that Respondent and opposing counsel were negotiating a separation agreement. This negotiation lasted approximately

six months until opposing counsel discovered that Respondent was not licensed to practice law in Maryland. Opposing counsel sent an email to Respondent asking whether she was licensed to practice in Maryland. Respondent did not respond. Petition ¶¶ 8-12.

(c) Count III (2015-D325): Disciplinary Counsel initiated investigations involving Counts I, II, and a third investigation in Docket No. 2015-D325 and requested that Respondent respond in writing to each of the allegations of misconduct in each matter. Respondent requested more time to respond to the allegations but failed to file a substantive response in any of the matters. On March 17, 2016, the Board ordered Respondent to file responses in each of the 2015 docketed matters within ten calendar days of the date of the order. On March 30, 2016, Respondent was personally served with the Board order and Disciplinary Counsel's previous letters with the complaints attached. To date, Respondent has failed to respond. On August 22, 2016, the Board ordered Respondent to file a response in 2016-D132. Respondent failed to respond in any of the three matters. [Disciplinary Counsel] sent subpoenas to Respondent for her client file in the matters involving James Morrison, Kevin Weaver and the third client matter involving Marquez Jackson. On March 30, 2016, Respondent was personally served with the subpoenas. Respondent failed to respond to the subpoenas. Petition ¶¶ 13-17.

See Petition at 2-4.

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

6. Disciplinary Counsel has made no promises to Respondent other than what is contained in the Petition for Negotiated Discipline. Tr. 28-29; Affidavit ¶ 7. Those promises and inducements are:

(a) In connection with this petition for negotiated discipline, Disciplinary Counsel agrees not to pursue any charges arising out of the allegations of misconduct in Docket Number 2016-D132. The former client in DN 2016-D132 alleges that Respondent failed to return file material to

her. The matter arguably also involved the unauthorized practice of law in Maryland.

(b) Disciplinary Counsel also agrees not to pursue any other charges arising from the conduct described in Section II other than those set forth above, or any sanction other than that set forth below. Disciplinary Counsel agrees not to pursue some charges that were in the Specification of Charges (in Counts I, II, and III) because the reciprocal disciplinary case (2017-D010) [now pending before the Court (D.C. App. No. 17-BG-228)] addresses the substantive facts and charges that had been outlined in Count II of the Specification, or other information has caused Disciplinary Counsel to not pursue certain charges.

Petition at 6. Respondent confirmed during the limited hearing that there have been no other promises or inducements other than those set forth in the Petition. Tr. 29.

7. Respondent has conferred with her counsel. Tr. 14-15; Affidavit ¶ 1.

8. Respondent has freely and voluntarily acknowledged the facts and misconduct reflected in the Petition and agreed to the sanction set forth therein. Tr. 20-21, 26, 29-30; Affidavit ¶¶ 4, 6.

9. Respondent is not being subjected to coercion or duress. Tr. 29-30; Affidavit ¶ 6.

10. Respondent is competent and was not under the influence of any substance or medication that would affect her participation at the limited hearing. Tr. 15-16.

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

a) she has the right to assistance of counsel if Respondent is unable to afford counsel;

b) she will waive her right to cross-examine adverse witnesses and to compel witnesses to appear on her behalf;

c) she will waive her right to have Disciplinary Counsel prove each and every charge by clear and convincing evidence;

d) she will waive her right to file exceptions to reports and recommendations filed with the Board and with the Court;

e) the negotiated disposition, if approved, may affect her present and future ability to practice law;

f) the negotiated disposition, if approved, may affect her Bar memberships in other jurisdictions, and may affect her present employment; and

g) any sworn statement by Respondent in her affidavit or any statements made by Respondent during the proceeding may be used to impeach her testimony if there is a subsequent hearing on the merits.

Tr. 18, 34-36; Affidavit ¶¶ 1, 9-10, 12.

12. Respondent and Disciplinary Counsel have agreed that the sanction in this matter should be a one-year suspension, concurrent to any other disciplinary suspension Respondent may be serving in this jurisdiction at the time the Court imposes the sanction in this matter; a fitness requirement; and restitution to Mr. Weaver of $2,900, with interest, as a pre-condition to reinstatement. Petition at 7; Tr. 26.[2] Respondent further understands that:

a) she must file with the Court an affidavit pursuant to D.C. Bar R. XI, § 14(g) in order for her suspension to be deemed effective for purposes of reinstatement;

b) she will be required to prove her fitness to practice law in accord with D.C. Bar R. XI, § 16 and Board Rule 9.8 prior to being allowed to resume the practice of law; and

[2] The parties agreed at the limited hearing that interest would be calculated at the statutory rate, and that the date from which interest would begin to accrue would be determined during the reinstatement proceeding. Tr. 26-28.

c) the reinstatement process may delay Respondent's readmission to the Bar.

Tr. 37-38.

13. The Petition provides the following circumstances in aggravation, which the Hearing Committee has taken into consideration:

> Respondent has a history of prior misconduct which resulted in a public censure (2014) and two Informal Admonitions (2002 and 2006). The public censure involved the same misconduct alleged here in Count II, *i.e.*, unauthorized practice of law. The 2002 Informal Admonition involved violations of Rules 8.4(c) and 1.4(a). The 2006 Informal Admonition involved violations of West Virginia Rules 3.4(c) and 5.5(a). The 2006 Informal Admonition was issued based upon the unauthorized practice of law in West Virginia and violating the rules of that jurisdiction. Also, Virginia recently imposed a 15-month suspension on Respondent, which [was] forwarded to the D.C. Court of Appeals for reciprocal action [(D.C. App. No. 17-BG-228)]. At this time, it remains pending although the Court suspended Respondent on an interim basis pending final Court order.

Petition at 10; *see* Tr. 33-34.

14. The Petition provides the following circumstances in mitigation, which the Hearing Committee has taken into consideration:

> Respondent: (1) is remorseful and has taken responsibility for her misconduct, including acknowledging that she violated the Rules as set forth above; (2) has been suffering from health and family problems; and has stated that she (3) has put in place mental health support systems to assist her.

Petition at 10; *see* Tr. 30-31.

15. Ms. Daniels, a complainant in the case dismissed as part of the parties' agreement (2016-D132) gave a statement during the limited hearing

pursuant to Board Rule 17.4(a), which the Hearing Committee has taken into consideration. Tr. 40-52. No other complainants attended the limited hearing.

III. DISCUSSION

The Hearing Committee shall approve an agreed negotiated discipline if it finds:

> a) that the attorney has knowingly and voluntarily acknowledged the facts and misconduct reflected in the Petition and agreed to the sanction therein;
>
> b) that the facts set forth in the Petition or as shown during the limited hearing support the attorney's admission of misconduct and the agreed upon sanction; and
>
> c) that the agreed sanction is justified.

D.C. Bar R. XI, § 12.1(c); 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 Petition and agreed to the sanction therein. Respondent, after being placed under oath, admitted to the stipulated facts and charges set forth in the Petition, and denied that she is under duress or has been coerced into entering into this disposition. Tr. 29-30. Respondent understands the implications and consequences of entering into this negotiated discipline. Tr. 18, 34-36.

Respondent has acknowledged that any and all promises that have been made to her by Disciplinary Counsel as part of this negotiated discipline are set

forth in writing in the Petition and that there are no other promises or inducements that have been made to her. Tr. 29; Affidavit ¶ 7.

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 Petition and established during the hearing and we conclude that they support the admission(s) of misconduct and the agreed upon sanction. Moreover, Respondent is agreeing to this negotiated discipline because she believes that she could not successfully defend against the misconduct described in the Petition. Tr. 19; Affidavit ¶ 5.

With regard to the second factor, the Petition states that Respondent violated Rules of Professional Conduct 1.1(a) and (b). Rule 1.1(a) requires a lawyer to "provide competent representation to a client." Rule 1.1(b) mandates that "[a] lawyer shall serve a client with skill and care commensurate with that generally afforded to clients by other lawyers in similar matters." The comments to Rule 1.1 state that competent representation includes "adequate preparation and continuing attention to the needs of the representation to assure that there is no neglect of such needs." Rule 1.1, cmt. [5]. The evidence supports Respondent's admission that she violated Rules 1.1(a) and (b) in that the stipulated facts in Count I lay out facts that support the Rule violation: Respondent failed to provide proof of service or request additional time to do so after filing suit, leading to the case's dismissal.

The Petition states that Respondent violated Rules of Professional Conduct 1.3(a) and (c). Rule 1.3(a) states that an attorney "shall represent a client zealously and diligently within the bounds of the law." "Neglect has been defined as indifference and a consistent failure to carry out the obligations that the lawyer has assumed to the client or a conscious disregard of the responsibilities owed to the client." *In re Wright*, 702 A.2d 1251, 1255 (D.C. 1997) (per curiam) (appended Board Report) (citing *In re Reback*, 487 A.2d 235, 238 (D.C. 1985), *adopted in relevant part*, 513 A.2d 226 (D.C. 1986) (en banc)). Rule 1.3(c) provides that an attorney "shall act with reasonable promptness in representing a client." The Court has held that failure to take action for a significant time to further a client's cause, whether or not prejudice to the client results, violates Rule 1.3(c). *In re Speights*, 173 A.3d 96, 101 (D.C. 2017) (per curiam). The same stipulated facts that support the violation of Rules 1.1(a) and (b) also support Respondent's admission that she violated Rules 1.3(a) and (c).

The Petition states that Respondent violated Rules of Professional Conduct 1.4(a) and (b). Rule 1.4(a) provides that "[a] lawyer shall keep a client reasonably informed about the status of a matter and promptly comply with reasonable requests for information." Under Rule 1.4(a), an attorney must not only respond to client inquiries, but must also initiate contact to provide information when needed. *See, e.g.*, *In re Bernstein*, 707 A.2d 371, 376 (D.C. 1998). Similarly, Rule 1.4(b) states than an attorney "shall explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation." The

Rule places the burden on the attorney to "initiate and maintain the consultative and decision-making process if the client does not do so and [to] ensure that the ongoing process is thorough and complete." Rule 1.4, cmt. [2]. The evidence supports Respondent's admission that she violated Rules 1.4(a) and (b) in that the stipulated facts in Count I lay out facts that support the Rule violation: Respondent failed to inform her client that the case had been dismissed for failure to provide proof of service.

The Petition states that Respondent violated Rule of Professional Conduct 1.16(d), which provides: "In connection with any termination of representation, a lawyer shall take timely steps to the extent reasonably practicable to protect a client's interests, such as . . . refunding any advance payment of fee or expense that has not been earned or incurred." *See, e.g.*, *In re Samad*, 51 A.3d 486, 497 (D.C. 2012) (per curiam) (finding a violation where the respondent claimed that he did some work on the case, but did not "suggest that he earned the entire flat fee or that he returned any portion of the fee"). The evidence supports Respondent's admission that she violated Rule 1.16(d) in that the stipulated facts in Count I lay out facts that support the Rule violation: Respondent did not refund any portion of the advance fee Ms. Weaver had paid at the outset of the representation.

The Petition states that Respondent violated Rule of Professional Conduct 5.5(a), which provides that a lawyer shall not "[p]ractice law in a jurisdiction where doing so violates the regulation of the legal profession in that jurisdiction." *See, e.g.*, *In re Kennedy*, 542 A.2d 1225, 1227 (D.C. 1988). The evidence supports

Respondent's admission that she violated Rule 5.5(a) in that the stipulated facts in Count II lay out facts that support the Rule violation: Respondent held herself out as able to practice law in Maryland when she was not a member of the Maryland Bar.

The Petition states that Respondent violated Rule of Professional Conduct 8.1(b), which provides that "a lawyer . . . in connection with a disciplinary matter, shall not . . . [f]ail to disclose a fact necessary to correct a misapprehension known by the lawyer. . . to have arisen in the matter, or knowingly fail to respond reasonably to a lawful demand for information from . . . [a] disciplinary authority . . . ." Thus, a knowing failure to respond to a request from Disciplinary Counsel regarding a disciplinary complaint constitutes a violation of Rule 8.1(b). *See, e.g.*, *In re Lea*, 969 A.2d 881, 888 (D.C. 2009). The evidence supports Respondent's admission that she violated Rule 8.1(b) in that the stipulated facts in Count III lay out facts that support the Rule violation: Respondent failed to respond to Disciplinary Counsel's requests for responses to allegations in three matters, even after the Board on Professional Responsibility ordered her to do so, and she has still not responded to date.

The Petition states that Respondent violated Rule of Professional Conduct 8.4(c), which provides that it is professional misconduct for a lawyer to "[e]ngage in conduct involving dishonesty, fraud, deceit, or misrepresentation." Dishonesty is the most general category in Rule 8.4(c), defined as "fraudulent, deceitful, or misrepresentative behavior [and] conduct evincing a lack of honesty, probity or

integrity in principle; [a] lack of fairness and straightforwardness . . . ." *In re Shorter*, 570 A.2d 760, 767-68 (D.C. 1990) (per curiam) (internal quotation marks and citation omitted); *see also In re Scanio*, 919 A.2d 1137, 1142-43 (D.C. 2007). Dishonesty in violation of Rule 8.4(c) does not require proof of deceptive or fraudulent intent. *See In re Romansky*, 825 A.2d 311, 315 (D.C. 2003). The evidence supports Respondent's admission that she violated Rule 8.4(c) in that the stipulated facts in Count II lay out facts that support the Rule violation: Respondent falsely held herself out to opposing counsel as being licensed to practice law in Maryland.

The Petition states that Respondent violated Rule of Professional Conduct 8.4(d), which provides that it is professional misconduct for a lawyer to "[e]ngage in conduct that seriously interferes with the administration of justice." To establish a violation of Rule 8.4(d), Disciplinary Counsel must demonstrate by clear and convincing evidence that: (i) Respondent's conduct was improper, *i.e.*, that Respondent either acted or failed to act when she should have; (ii) Respondent's conduct bore directly upon the judicial process with respect to an identifiable case or tribunal; and (iii) Respondent's conduct tainted the judicial process in more than a *de minimis* way, *i.e.*, it must have potentially had an impact upon the process to a serious and adverse degree. *In re Hopkins*, 677 A.2d 55, 60-61 (D.C. 1996). Failure to respond to Disciplinary Counsel's inquiries and orders of the Court constitutes a violation of Rule 8.4(d). Rule 8.4, cmt. [2]. The evidence supports Respondent's admission that she violated Rule 8.4(d) in that the stipulated facts in

Count II lay out facts that support the Rule violation: Respondent attempted to negotiate a separation agreement for six months while she was not licensed to do so, thus delaying resolution of the matter, and the stipulated facts in Count III provide that Respondent failed to respond to Disciplinary Counsel's inquiries in three matters.

The Petition states that Respondent violated D.C. Bar Rule XI, § 2(b)(3), which provides that "[f]ailure to comply with any order of the Court or the Board issued pursuant to [Rule XI]" is a ground for discipline. The evidence supports Respondent's admission that she violated D.C. Bar Rule XI, § 2(b)(3) in that the stipulated facts in Count III lay out facts that support the Rule violation: Respondent failed to comply with a Board order to respond to Disciplinary Counsel's inquiries in three matters.

C. The Agreed-Upon Sanction Is Justified.

The third and most complicated factor the Hearing Committee must consider is whether the sanction agreed upon is justified and not "unduly lenient." *See* D.C. Bar R. XI, § 12.1(c); Board Rule 17.5(a)(iii); *In re Johnson*, 984 A.2d 176, 181 (D.C. 2009). Based on the record as a whole, the Hearing Committee Chair's *in camera* review of Disciplinary Counsel's investigative file and *ex parte* discussion with Disciplinary Counsel, and our review of relevant precedent, we conclude that the agreed-upon sanction is justified and not unduly lenient, for the following reasons:

Respondent has admitted to several charges brought by Disciplinary Counsel involving two separate client matters and interfering with the disciplinary process. This Hearing Committee considers these to be serious offenses. The Hearing Committee believes that the agreed-upon sanction is appropriate including, especially, the fitness requirement, in light of these offenses.

The Hearing Committee has taken account of the parties' agreement that Respondent took full responsibility for her misconduct and is remorseful. *See* Petition at 10; Tr. 31. Those mitigating facts were reinforced at the limited hearing where, in response to the Hearing Committee's series of question about the violations, Respondent accepted fault and showed remorse for the wrongful facts set out in the Petition. The Hearing Committee finds that the Respondent's acceptance of responsibility for these acts, as well as her remorse for these acts, was credible. The Committee also takes into account Respondent's prior discipline, consisting of two informal admonitions and one public censure, which show previous instances of dishonesty, unauthorized practice of law, and failure to communicate, two violations at issue in this case. The fact that Respondent violated these same disciplinary rules after having been sanctioned in the past is a significant aggravating factor.

The Hearing Committee further takes into account the charges that Disciplinary Counsel promised not to pursue: relating to both Bar Docket No. 2016-D132, dismissed as part of this agreement, and the charges originally included in the contested Specification of Charges in this matter. The Hearing

Committee finds that the sanction is appropriate in this case considering the charges that Disciplinary Counsel will not pursue. Based on the Chair's *in camera* review of Disciplinary Counsel's file and *ex parte* discussion with Disciplinary Counsel, the Committee agrees that the charges for which Respondent is not being sanctioned are ones for which the evidence was not as strong.

The Hearing Committee finds that a one-year suspension with fitness and restitution is in line with discipline in somewhat similar contested cases. For example, in *in re Schoeneman*, 891 A.2d 279, 284-87 (D.C. 2006) (per curiam) (appended Board Report), the respondent received a four-month suspension for neglect of three cases over a two-year period, resulting in prejudice to each client, a failure to notify clients of his suspension, and falsely telling one client that his case was "fine" after it had been dismissed. In addition, in *In re Carter*, 11 A.3d 1219, 1221-22 (D.C. 2011) (per curiam), the respondent was given an eighteen-month suspension *with fitness* where the respondent failed to attend hearings and missed a deadline for a motion opposing summary judgment, fabricated an excuse for his delay, failed to send a letter to the EEOC as promised or do any substantive work in a separate matter, and failed to cooperate with Disciplinary Counsel. Furthermore, the Hearing Committee finds that the fitness requirement and restitution provided for in the negotiated discipline as a precondition to reinstatement are appropriate given Respondent's harm to two clients, her interference with the disciplinary process, and her prior discipline. On balance, the

Hearing Committee finds that the negotiated disposition 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 impose a one-year suspension, concurrent to any other disciplinary suspension Respondent may be serving in this jurisdiction at the time the Court imposes the sanction in this matter; a fitness requirement; and restitution to Mr. Weaver of $2,900, with interest, as a pre-condition to reinstatement.

AD HOC HEARING COMMITTEE

/EB/
Edward Baldwin, Esquire
Chair

/RJB/
Dr. Robin J. Bell
Public Member

/AJS/
Arlus J. Stephens, Esquire
Attorney Member