

THIS REPORT IS NOT A FINAL ORDER OF DISCIPLINE*



DISTRICT OF COLUMBIA COURT OF APPEALS
BOARD ON PROFESSIONAL RESPONSIBILITY

Issued
July 30, 2026

In the Matter of: :
:
WILLIAM C. SWETT, :
: Board Docket No. 26-BD-038
Respondent. : Disc. Docket No. 2026-D029
:
A Suspended Member of the Bar of the :
District of Columbia Court of Appeals :
(Bar Registration No. 1005374) :

REPORT AND RECOMMENDATION
OF THE BOARD ON PROFESSIONAL RESPONSIBILITY

This matter is before the Board on Professional Responsibility (the “Board”) following Respondent’s guilty plea in the United States District Court for the District of South Carolina to wire fraud (18 U.S.C. § 1343) and money laundering (18 U.S.C. § 1956(a)(1)(B)(i)).

BACKGROUND

On March 19, 2026, in the United States District Court for the District of South Carolina, Respondent pled guilty to four counts of wire fraud (18 U.S.C. § 1343) and four counts of money laundering (18 U.S.C. § 1956(a)(1)(B)(i)). Respondent has not been sentenced, and the online docket in Respondent’s criminal case does not reflect a sentencing date.

On June 1, 2026, Disciplinary Counsel reported Respondent’s guilty plea to the District of Columbia Court of Appeals (the “Court”). On June 8, 2026, the Court

* Consult the ‘Disciplinary Decisions’ tab on the Board on Professional Responsibility’s website (www.dcattorneydiscipline.org) for more information about this case.

suspended Respondent and directed the Board to institute a formal proceeding to determine the nature of Respondent's offenses and whether the crimes involve moral turpitude within the meaning of D.C. Code § 11-2503(a) (2001).¹ On June 30, 2026, Disciplinary Counsel filed a statement with the Board recommending Respondent's disbarment based on his conviction of a crime involving moral turpitude *per se*. Respondent did not file a statement, the time for doing so having expired.

For the reasons that follow, the Board recommends that the Court disbar Respondent pursuant to D.C. Code § 11-2503(a) based on his conviction of a crime involving moral turpitude *per se*.

ANALYSIS

D.C. Code § 11-2503(a) requires the disbarment of a member of the District of Columbia Bar convicted of a crime of moral turpitude. The legal standard for moral turpitude was established in *In re Colson*, 412 A.2d 1160 (D.C. 1979) (en banc). In *Colson*, the Court held that a crime involves moral turpitude if “the act denounced by the statute offends the generally accepted moral code of mankind,” if it involves “baseness, vileness or depravity in the private and social duties which a man owes to his fellow men or to society in general, contrary to the accepted and customary rule of right and duty between man and man,” or if the act is “contrary to justice, honesty, modesty, or good morals.” *Id.* at 1168 (internal citations omitted). Once the Court determines that a particular crime involves moral turpitude *per se*,

¹ As of July 9, 2026, Respondent had not filed the affidavit required by D.C. Bar Rule XI, Section 14(g). *See* Disciplinary Counsel's Notice of Non-Filing.

the Board must adhere to that ruling and disbarment must be imposed. *Id.* at 1164-65.

The Court “has previously concluded that both mail and wire fraud are crimes of moral turpitude *per se*.” *In re Miller*, 258 A.3d 834, 834 (D.C. 2021) (per curiam); *In re Bryant*, 46 A.3d 402, 402 (D.C. 2012) (per curiam) (“[B]oth mail fraud and wire fraud are crimes of moral turpitude *per se*.” (quoting *In re Evans*, 793 A.2d 468, 469 (D.C. 2002) (per curiam))).

The Court has not yet determined whether a conviction under 18 U.S.C. § 1956(a)(1)(B)(i) involves moral turpitude *per se*. However, “[w]hen an attorney is convicted of multiple offenses, disbarment is imposed if any one of them involves moral turpitude *per se*.” *In re Hoover-Hankerson*, 953 A.2d 1025, 1026 (D.C. 2008) (per curiam). Thus, we need not analyze whether money laundering under 18 U.S.C. § 1956(a)(1)(B)(i) involves moral turpitude *per se*.

The fact that Respondent has not been sentenced should not delay the Board’s recommendation here; but, the Court should defer final action until after sentencing. Disciplinary Counsel should file a certified copy of the final judgment of conviction with the Court following Respondent’s sentencing so that the Court may take final action in this matter. *See, e.g., In re Allison*, Bar Docket No. 388-08, at 3 n.1 (BPR June 30, 2009), *recommendation adopted*, 990 A.2d 467 (D.C. 2010) (per curiam)

(respondent disbarred following receipt final judgment of conviction); *see also In re Hirschfeld*, 622 A.2d 688, 689 n.1 (D.C. 1993).²

CONCLUSION

For the foregoing reasons, the Board recommends that, upon receipt of a certified copy of the final judgment of conviction, the Court disbar Respondent pursuant to D.C. Code § 11-2503(a) based on his conviction of a crime involving moral turpitude *per se*.

BOARD ON PROFESSIONAL RESPONSIBILITY

By: 

William V. Hindle, M.D.

All members of the Board concur in this Report and Recommendation.

² In his plea agreement, Respondent waived “the right to contest either the conviction or the sentence in any direct appeal or other post-conviction action, including any proceedings under 28 U.S.C. § 2255.” The “waiver does not apply to claims of ineffective assistance of counsel, prosecutorial misconduct, or future changes in the law that affect [Respondent’s] sentence.” ODC Statement, Att. A at 8. *Cf.* Order, *In re King*, D.C. App. No. 24-BG-0275 (May 19, 2025) (staying consideration of the Board’s recommendation that the respondent be disbarred pending expiration of the time for respondent to note a direct appeal).