FILED
Jun 16, 2026
Disciplinary Board
Docket # 047

DISCIPLINARY BOARD
WASHINGTON STATE BAR ASSOCIATION

In re **ROBERT M. KEEFE,** Lawyer (Bar No. 5222).	Proceeding No. 24#00056 ODC File No. 22-01324 Resignation Form of Robert M. Keefe (ELC 9.3(b))

I, Robert M. Keefe, declare as follows:

1. I am over the age of eighteen years and am competent. I make the statements in this declaration from personal knowledge.

2. I was admitted to practice law in the State of Washington on October 18, 1973.

3. I was served with a Formal Complaint and Notice to Answer in this matter on October 9, 2024. I was served with the First Amended Formal Complaint in this matter on July 23, 2025.

4. After consulting with my counsel, Christopher J. Mainard, I have voluntarily decided to resign from the Washington State Bar Association (the Association) in Lieu of Discipline under Rule 9.3 of the Washington Supreme Court's Rules for Enforcement of Lawyer Conduct (ELC).

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5. Attached hereto as Exhibit A is Disciplinary Counsel's statement of alleged misconduct for purposes of ELC 9.3(b). I am aware of the alleged misconduct stated in Disciplinary Counsel's statement, but rather than defend against the allegations, I wish to permanently resign from membership in the Association.

6. I consent to entry of an order under ELC 13.9(e) assessing expenses of $1,500 in this matter.

7. I agree to pay any additional costs or restitution that may be ordered by a Review Committee under ELC 9.3(g).

8. I understand that my resignation is permanent and that any future application by me for reinstatement as a member of the Association is currently barred. If the Washington Supreme Court changes this rule or an application is otherwise permitted in the future, it will be treated as an application by one who has been disbarred for ethical misconduct. If I file an application, I will not be entitled to a reconsideration or reexamination of the facts, complaints, allegations, or instances of alleged misconduct on which this resignation was based.

9. I agree to (a) notify all other states and jurisdictions in which I am admitted, of this resignation in lieu of discipline; (b) seek to resign permanently from the practice of law in any other state or jurisdiction in which I am admitted; and (c) provide Disciplinary Counsel with copies of this notification and any response(s). I acknowledge that this resignation could be treated as a disbarment by all other jurisdictions.

10. I agree to (a) notify all other professional licensing agencies in any jurisdiction from which I have a professional license that is predicated on my admission to practice law of this resignation in lieu of discipline; (b) seek to resign permanently from any such license; and (c) provide disciplinary counsel with copies of any of these notifications and any responses.

11. I agree that when applying for any employment, I will disclose the resignation in lieu of discipline in response to any question regarding disciplinary action or the status of my license to practice law.

12. I understand that my resignation becomes effective on Disciplinary Counsel's endorsement and filing of this document with the Clerk, and that under ELC 9.3(c) Disciplinary Counsel must do so promptly following receipt of this document.

13. When my resignation becomes effective, I agree to be subject to all restrictions that apply to a disbarred lawyer.

14. Upon filing of my resignation, I agree to comply with the same duties as a disbarred lawyer under ELC 14.1 through ELC 14.4.

15. I understand that, after my resignation becomes effective, it is permanent. I will never be eligible to apply and will not be considered for admission or reinstatement to the practice of law nor will I be eligible for admission for any limited practice of law.

16. I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

6/16/26 Seattle
Date and Place

Robert M. Keefe, Bar No. 5222

ENDORSED BY:

Francisco Rodriguez, Disciplinary Counsel
Bar No. 22881

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EXHIBIT
A

DISCIPLINARY BOARD
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In re **ROBERT M. KEEFE,** Lawyer (Bar No. 5222).	Proceeding No. 24#00056 ODC File No. 22-01324 STATEMENT OF ALLEGED MISCONDUCT UNDER ELC 9.3(b)(1)

The attached First Amended Formal Complaint, filed on July 23, 2025, in Proceeding No. 24#00056, constitutes Disciplinary Counsel's statement of alleged misconduct under Rule 9.3(b)(1) of the Washington Supreme Court's Rules for Enforcement of Lawyer Conduct (ELC).

DATED December 23, 2025.

F. Rodriguez

Francisco Rodriguez, Bar No. 22881
Senior Disciplinary Counsel

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Board

Docket # 025

DISCIPLINARY BOARD
WASHINGTON STATE BAR ASSOCIATION

In re **ROBERT M. KEEFE,** Lawyer (Bar No. 5222)	Proceeding No. 24#00056 FIRST AMENDED FORMAL COMPLAINT

Under Rule 10.3 of the Washington Supreme Court's Rules for Enforcement of Lawyer Conduct (ELC), the Office of Disciplinary Counsel (ODC) of the Washington State Bar Association charges the above-named lawyer with acts of misconduct under the Washington Supreme Court's Rules of Professional Conduct (RPC) as set forth below.

ADMISSION TO PRACTICE

1. Respondent Robert M. Keefe was admitted to the practice of law in the State of Washington on October 18, 1973.

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FACTS

2016 Disciplinary Investigation

2. In March 2016, ODC received notice that five checks drawn on Respondent's trust account had been returned unpaid due to insufficient funds in the account and opened a grievance file to investigate the matter.

3. The total amount of the 2016 overdrafts was almost $24,000.

4. In response to the 2016 grievance, Respondent explained to ODC that Respondent's office had inadvertently deposited some client payments into the clients' bank accounts before Respondent had received the corresponding funds from the Washington Department of Labor & Industries (L&I).

5. After investigating the overdrafts, ODC informed Respondent that ODC had identified RPC violations relating to Respondent's trust account practices.

6. Respondent agreed to make changes to Respondent's trust account policies and recordkeeping practices to comply with the RPC.

7. ODC subsequently elected to dismiss the grievance.

8. ODC's June 6, 2016 letter dismissing the grievance identified the following RPC violations:

a. Disbursement of funds on behalf of a client or third person in excess of funds on deposit for that person in violation of RPC 1.15A(h)(8);

b. Funds belonging to a lawyer were maintained in the trust account in violation of RPC 1.15A(h)(1); and

c. Failure to maintain a checkbook register that complies with RPC 1.15B(a)(1).

9. To address these violations, Respondent agreed not to issue trust account checks to clients before the corresponding funds had been deposited into Respondent's trust account.

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10. Respondent also agreed to review Respondent's trust account records monthly and to remove all of Respondent's earned fees from the trust account every month.

Supervision of Accountants

11. From at least 2016 through 2023, Respondent was a sole practitioner focusing on workers' compensation cases.

12. During at least 2021 and 2022, Respondent's law firm handled a large volume of financial transactions, with deposits and disbursements of over $200,000 each month.

13. From at least 2016 through 2023, Respondent outsourced the bookkeeping and trust accounting for Respondent's law firm to Minar Northey, a Seattle accounting firm with a staff of about 16 accountants.

14. During this time, Respondent did not supervise Minar Northey's work.

15. During this time, Respondent's client ledgers, trust account check register, and other electronic accounting records were maintained exclusively by Minar Northey.

16. During this time, Minar Northey used QuickBooks software for Respondent's accounting, including Respondent's trust account check register, client ledgers, and reconciliations.

17. During this time, Respondent did not have access to the QuickBooks file for Respondent's law firm.

18. During this time, Respondent did not review the electronic check register or electronic client ledgers for Respondent's law firm.

Process for disbursal of L&I payments

19. From at least 2016 through 2023, when Respondent's workers' compensation clients prevailed on their claims, they received monthly pension payments, usually from L&I.

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20. During this time, Respondent collected a set percentage of each pension payment as legal fees.

21. During this time, payments for Respondent's pension clients were electronically deposited directly into Respondent's trust account. These deposits occurred on the fifteenth of the month, unless the fifteenth fell on a weekend or bank holiday, in which case the funds were deposited into Respondent's trust account on the preceding business day.

22. During this time, many of Respondent's clients were low-income and depended on timely receipt of their checks to pay their bills.

23. In 2021 and 2022, Respondent provided clients with their monthly L&I payments (less Respondent's legal fees) by having an assistant either mail a check to the client or deposit a check directly into the client's bank account.

24. During this time, Respondent was not always physically present to supervise Respondent's staff because Respondent sometimes resided at Respondent's second home in Hawaii.

25. During this time, Respondent had an assistant prepare the pension payment checks to Respondent's clients in amounts specified by Respondent.

26. During this time, the amounts for the clients' pension payments did not vary from month to month, except when there were cost of living adjustments.

27. During this time, Respondent's assistant printed checks for Respondent's pension clients approximately one and a half to two weeks prior to the date Respondent anticipated receiving their pension payments from L&I.

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28. During this time, the assistant post-dated the pension payment checks to Respondent's clients, printing them with the date of the anticipated L&I deposit on the face of the checks.

29. During this time, for clients who received their checks by mail, the assistant mailed the checks to the clients approximately one week before the corresponding L&I payment was received.

30. The assistant did so at Respondent's direction.

31. When doing so, the assistant included a note asking the client not to deposit the check until the date on the check.

September 2022 overdrafts

32. On September 23, 2022, ODC received a notice a from US Bank regarding overdrafts on Respondent's trust account. The notice identified a total of eight overdrafts. All of the overdrafts related to checks deposited on September 14, 2022.

33. On September 23, 2022, ODC also received a letter from Respondent regarding two of the overdrafts on Respondent's trust account. Respondent's letter explained why Respondent believed the overdrafts occurred and the steps Respondent took to address the issue.

34. In Respondent's letter, Respondent explained that the September 2022 overdrafts occurred because an assistant had inadvertently deposited the client pension checks for September 2022 into the clients' bank accounts a day early, on September 14, 2022, before Respondent's bank had received the corresponding L&I deposits.

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35. Enclosed with Respondent's letter was a supporting statement from Respondent's assistant explaining that the early deposits[1] had been accidental and that prior to September 2022, the assistant had always deposited Respondent's checks to clients into the clients' bank accounts on the date the funds were available.

36. During ODC's January 26, 2024 deposition of Respondent, Respondent testified that Respondent believed the premature deposits in September 2022 had been an isolated incident and that Respondent did not know of any other instances in which Respondent's assistant had prematurely deposited checks into client bank accounts.

Pattern of early deposits

37. In fact, premature deposits of client checks had occurred every month from January 2022 through August 2022.

38. In March, April, May, and June 2022, Respondent's assistant made the hand-delivered bank deposits into client bank accounts a day early.

39. In each of these four months, more than 20 checks were prematurely deposited into clients' bank accounts before Respondent had received the corresponding funds from L&I.

40. In addition, in each month from January 2022 through August 2022 except May 2022, Respondent's clients deposited mailed checks prior to the date on the face of the check and prior to the date Respondent received the corresponding L&I deposit.

41. At Respondent's January 26, 2024 deposition, Respondent testified that Respondent did not know about the early deposits from January through August 2022 until ODC brought them to Respondent's attention during the deposition.

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[1] The phrases "early deposits" and "premature deposits," as used in this Formal Complaint, refer to deposits of pension payments checks issued by Respondent into the bank accounts of Respondent's clients before the corresponding payments from L&I were deposited into Respondent's trust account.

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42. In each month from March through June 2022, Respondent used over $30,000 in funds Respondent held in trust for client, G.J., to cover checks Respondent had prematurely issued to other clients.

43. On September 8, 2022, Respondent issued a trust check to G.J. in the amount of $100,000. The check cleared Respondent's bank on the same day.

44. After G.J.'s $100,000 had been removed from the trust account, Respondent had insufficient funds in Respondent's trust account to cover all of the checks to Respondent's clients that were deposited early on September 14, 2022.

45. During ODC's deposition of Respondent on January 26, 2024, Respondent acknowledged that the premature deposits that occurred in 2022 were due to Respondent's failure to adequately supervise Respondent's staff.

Minar Northey monthly reports

46. In at least 2021 and 2022, Minar Northey sent Respondent three monthly reports: an "IOLTA[2] Report," a "Reconciliation Detail," and an "Account QuickReport" listing the trust transactions for each client for that month.

47. During this time, the monthly IOLTA Report listed the overall balance held in the trust account for clients and the amount due to Respondent in earned fees held in the trust account.

48. During this time, although Minar Northey's monthly reports informed Respondent of the amount of earned fees held in the trust account, Respondent did not remove those fees from the trust account each month.

[2] Interest on Lawyer's Trust Account.

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49. From January 2022 through September 2022, the total amount of fees Respondent had earned but not removed from Respondent's trust account at the end of each month ranged from a low of $16,340.10 to a high of $45,971.66.

50. During this time, the Reconciliation Detail reports for Respondent's trust account prepared by Minar Northey purported to reconcile the check register balance for Respondent's trust account to the bank statement balance, but these reconciliations were not accurate because Minar Northey used adjusting journal entries to force the check register balance to reconcile with the bank statement balance when it otherwise would not.

51. During this time, neither Minar Northey, nor Respondent performed any other reconciliation of the check register balance for Respondent's trust account to the bank statement balance.

52. During this time, neither Respondent nor Minar Northey reconciled Respondent's trust account check register balance to the combined total of all client ledger records.

53. The "Account QuickReport" for each month included the monthly client ledger activity for each client with a running balance.

54. From January through September 2022, the Account QuickReports Minar Northey provided to Respondent reflected negative client ledger balances.

55. Respondent took no action to address the negative client ledger balances reflected in these reports.

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Client ledgers

56. In 2021 and 2022, Respondent's client ledgers reflected negative balances.

57. At Respondent's January 2024 deposition, Respondent testified that Respondent did not know that Respondent's client ledgers reflected negative balances until ODC raised the issue at the deposition.

58. Respondent's client ledgers for 2021 and 2022 were inaccurate.

59. Respondent's client ledgers for 2021 and 2022 were incomplete.

60. Respondent's client ledger entries during this period did not always list the payor or payee for each transaction.

61. Respondent's client ledger entries during this period did not always identify the purpose for which funds were received or disbursed.

62. For cases involving clients who received payments from private insurers, Respondent's client ledgers during this period improperly recorded funds as having been received from L&I rather than the private insurer.

63. Respondent's client ledgers during this period included entries for trust account deposits that were not made.

64. Respondent's client ledgers during this period included fee payments to Respondent in amounts that did not match the payment amounts recorded on the corresponding check stubs.

65. Respondent's client ledgers during this period included checks to vendors drawn on the operating account.

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66. As described below, Respondent's failure to maintain client ledgers that were accurate and complete resulted in Respondent collecting funds to which Respondent was not entitled.

67. From August 2020 through December 2023, Respondent wired pension payments for client A.S. to Mexico each month.

68. During this period, Respondent charged A.S. a $75 fee for each transaction, because Respondent's paper transaction receipts for the wire transfers indicated that the bank charged such a fee for international wire transfers.

69. However, Respondent's bank waives the fee for wire transfers originating from an IOLTA account.

70. Respondent's bank statements did not reflect any fee for the wire transfers to A.S.

71. Respondent did not separately record the $75 wire transfer fee on A.S.'s client ledger.

72. As a result, Respondent did not discover that the bank had not charged a wire transfer fee during the reconciliation process.

73. Between August 2020 and December 2023, Respondent collected approximately $3,000 from A.S. to which Respondent was not entitled.

74. In 2021 and 2022, Respondent's client ledgers did not accurately reflect the amounts being received, disbursed, and/or transferred in each trust account transaction.

75. For example, check #45636 issued to Respondent was listed on the client ledger for G.B. as a payment of fees and costs in the amount of $23,196.55.

76. However, the amount listed on the face of check #45636 was $19,112.00.

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Fee calculations

77. During 2022, in determining the amounts due to clients each month, Respondent rounded the amount owed to each pension client to a flat dollar amount.

78. Respondent's rounding process resulted in some clients receiving lesser payments than they were owed and others more than they were owed.

79. In September, October, and November 2022, this process resulted in Respondent collecting over a hundred dollars each month in unearned fees.

COUNT 1

80. By using G.J.'s funds to cover checks Respondent had issued to other clients and/or by improperly collecting wire transfer fees from A.S. and/or by improperly rounding Respondent's fee upward, Respondent violated RPC 1.15A(b) and/or RPC 1.15A(c)(1).

COUNT 2

81. By disbursing funds from Respondent's trust account before Respondent received the corresponding deposits and/or by disbursing funds to clients in excess of the funds the clients had on deposit in Respondent's trust account, Respondent violated RPC 1.15A(h)(7) and/or RPC 1.15A(h)(8).

COUNT 3

82. By commingling Respondent's funds with client funds in Respondent's trust account, Respondent violated RPC 1.15A(c) and/or RPC 1.15A(h)(1).

COUNT 4

83. By failing to maintain a complete and accurate check register for Respondent's trust account, Respondent violated RPC 1.15B(a)(1).

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COUNT 5

84. By failing to maintain complete and accurate client ledgers, Respondent violated RPC 1.15B(a)(2).

COUNT 6

85. By failing to properly reconcile the check register to the bank statements and/or by failing to properly reconcile the check register to the combined total of all client ledgers, Respondent violated RPC 1.15A(h)(6).

COUNT 7

86. By failing to make reasonable efforts to supervise Respondent's staff and/or Minar Northey, Respondent violated RPC 5.3(b).

ADDITIONAL FACTS RELATING TO COUNTS 8 THROUGH 15

87. Paragraphs 1 through 79 are incorporated by reference herein.

False Statements to ODC

88. In ODC's June 6, 2016 dismissal letter, ODC wrote that Respondent did not remove Respondent's earned fees from Respondent's trust account on a regular basis and appeared to have $27,000.00 of Respondent's funds in Respondent's trust account.

89. In a letter to Respondent dated December 6, 2022, ODC requested that Respondent answer a series of investigative inquiries.

90. ODC asked Respondent whether Respondent had withdrawn the $27,000.00 in earned fees identified in ODC's June 6, 2016 dismissal letter from Respondent's trust account.

91. ODC also asked Respondent to specify when any such withdrawal was made and to provide a copy of the bank statement reflecting the withdrawal.

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92. On December 7, 2022, Respondent sent ODC an email message responding to ODC's December 6, 2022 letter.

93. Respondent's email message stated that Respondent had withdrawn the $27,000.00 at or near the date of ODC's June 6, 2016 dismissal letter.

94. This statement was false.

95. Respondent did not withdraw the specified funds at or near June 6, 2016.

96. On February 6, 2023, Respondent sent ODC a letter responding to ODC's December 6, 2022 letter. Respondent's letter included a "Records Response Compliance Checklist."

97. In completing this checklist, Respondent indicated that the $27,000.00 referenced in ODC's December 6, 2022 letter had been removed from Respondent's trust account in July 2016.

98. Respondent identified three checks, check #43395, #43396, and #43479, as representing Respondent's withdrawal of the $27,000.00 referenced in ODC's December 6, 2022 letter.

99. Respondent's statement to ODC that Respondent had withdrawn the $27,000.00 in July 2016 was false.

100. Respondent's statement to ODC that Respondent had withdrawn the $27,000.00 via the three specified checks was false.

101. Respondent did not withdraw the $27,000.00 referenced in ODC's December 6, 2022 letter in July 2016.

102. The three checks identified by Respondent were regular monthly fee payments collected by Respondent.

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103. Respondent did not withdraw the $27,000 referenced in ODC's December 6, 2022 letter through the identified checks as Respondent indicated to ODC.

104. On May 13, 2024, Respondent's counsel sent ODC a letter in which Respondent, through counsel, stated that Respondent's practice of issuing post-dated checks to clients was a response to mail delivery delays caused by the COVID pandemic.

105. In July 2024, Respondent's counsel sent ODC a letter for submission to a Review Committee of the Disciplinary Board. In this letter, Respondent, through counsel, again stated that Respondent's practice of issuing post-dated checks to clients was a response to mail delivery delays caused by the COVID pandemic.

106. Respondent's statements that Respondent's issuance of post-dated checks to clients was a response to the COVID pandemic were false.

107. From December 2017 through January 2020, a period prior to the start of any COVID-related mail delivery delays, Respondent issued at least 50 post-dated checks to Respondent's clients.

108. Respondent issued these post-dated checks before Respondent had received the corresponding deposits in Respondent's trust account.

109. These post-dated checks were deposited into client bank accounts before the corresponding payments from L&I had been deposited into Respondent's trust account.

Client Ledgers

110. From January 1, 2024, to at least March 31, 2025, Respondent received monthly reports from Minar Northey listing the trust account balances for Respondent's clients.

111. For 13 of the 15 months during this period, the monthly reports Respondent received from Minar Northey reflected negative trust account balances for one or more clients.

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112. During the period from January 1, 2024, to April 30, 2025 (audit period), Respondent's QuickBooks client ledgers showed negative balances.

113. Respondent's client ledgers during the audit period were inaccurate.

114. For example, Respondent's client ledgers include an entry for a non-existent trust account check, check #0424.

115. Respondent's client ledgers during the audit period also include inaccurate entries for fee payment checks issued to Respondent.

116. On January 12, 2024, Respondent wrote check #46320 to Respondent for $12,404.18.

117. However, Respondent's trust account records show that Respondent linked $14,212.35 in client fee payments to this check.

118. In doing so, Respondent reduced Respondent's client ledger balances by $1,808.17 more than the check amount, even though Respondent did not actually withdraw the extra funds from the trust account.

119. As discussed below, Respondent's client ledgers during the audit period also include entries that do not accurately reflect the sources of trust account deposits.

Supervision of Minar Northey

120. Respondent failed to make reasonable efforts to supervise Minar Northey's handling of Respondent's trust account records during the audit period.

121. Respondent failed to review Respondent's electronic client ledgers maintained by Minar Northey during the audit period.

122. As of at least January 26, 2024, Respondent knew that the client ledgers maintained by Minar Northey prior to the audit period had not been accurate and complete.

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123. Respondent failed to take reasonable steps to ensure that Minar Northey was maintaining accurate client ledgers during the audit period.

124. As discussed in more detail below, Respondent also failed to take reasonable steps to ensure Minar Northey properly reconciled Respondent's trust account records during the audit period.

Disbursements Exceeding Funds on Deposit

125. During the audit period, Respondent disbursed funds to clients to which the clients were not entitled and which exceeded the funds the clients had on deposit in Respondent's trust account.

Example #1: Client D.L.

126. On May 15, 2024, Respondent issued trust account check #44426 to client D.L. in the amount of $5,203.00.

127. D.L. was only entitled to a disbursement of $3,033.90 at that time.

128. Respondent's payment exceeded the funds D.L. had on deposit in Respondent's trust account.

129. Respondent's overpayment resulted in a negative client ledger balance for D.L. of -$2,169.10.

130. On May 17, 2024, Respondent deposited $3,417.00 of Respondent's own funds into Respondent's trust account.

131. This deposit was credited to the client ledger for D.L.

132. The deposit resulted in $1,247.90 of Respondent's own funds being held in Respondent's trust account.

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133. Respondent did not remove the $1,247.90 from Respondent's trust account until June 13, 2024.

Example #2: Client B.C.

134. On April 3, 2024, Respondent issued check #46509 to client B.C. in the amount of $3,554.00.

135. B.C was only entitled to a disbursement of $2,842.94 at that time.

136. Respondent's April 3, 2024 payment to B.C. exceeded the funds B.C. had on deposit in Respondent's trust account.

137. Respondent's April 3, 2024 overpayment resulted in a negative client ledger balance for B.C.

138. On August 2, 2024, Respondent issued check #46499 to B.C. in the amount of $811.00.

139. B.C. was only entitled to a disbursement of $710.79 at that time.

140. Respondent's August 2, 2024 payment to B.C. exceeded the funds B.C. had on deposit in Respondent's trust account.

141. Respondent's August 2, 2024 overpayment resulted in a negative client ledger balance for B.C.

142. Respondent's client ledger for B.C. shows a deposit on September 6, 2024, in the amount of $711.00.

143. The source of the funds was Respondent, through a check written on Respondent's operating account.

144. The client ledger falsely identifies the source of this deposit as L&I.

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145. Respondent's client ledger for B.C. shows a deposit on September 25, 2024, in the amount of $89.11.

146. The source of the funds was Respondent, through a check written on Respondent's operating account.

147. The client ledger falsely identifies the source of this deposit as L&I.

Example #3: Client J.F.

148. On August 15, 2024, September 13, 2024, and October 15, 2024, Respondent issued checks to client J.F., each in the amount of $2,590.00.

149. J.F. was only entitled to a disbursement of $2,559.56 on each of those dates.

150. Each of Respondent's three payments to J.F. exceeded the funds J.F. had on deposit in Respondent's trust account.

151. Respondent's client ledger for J.F. lists a deposit of funds in the amount of $30.00 on September 26, 2024.

152. The source of the funds was Respondent, through a check written on Respondent's operating account.

153. The client ledger falsely identifies the source of this deposit as L&I.

154. Respondent's client ledger for J.F. had a negative balance as of April 30, 2025, due to Respondent's overpayments of Respondent's fees in 2024.

Conversion of Client Funds

155. During the audit period, Respondent withdrew funds from Respondent's trust account to which Respondent was not entitled.

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Example #1: Office expense paid from trust account

156. On February 2, 2024, Respondent paid $263.37 from Respondent's trust account to Deluxe Business Systems.

157. The $263.37 was paid using client funds.

158. However, the expenditure was for an office expense of Respondent's.

159. Respondent was not entitled to these funds.

Example #2: Check #46188

160. During the audit period, Respondent also disbursed funds from the trust account to which Respondent was not entitled by issuing checks for amounts in excess of the fees to which Respondent was entitled.

161. On March 15, 2024, Respondent issued check #46188 payable to Respondent in the amount of $14,686.77.

162. However, Respondent's trust account records show that only $12,925.35 in client fee payments were recorded on Respondent's client ledgers for this check.

163. Respondent disbursed the remaining $1,761.42 to Respondent without entitlement to the funds.

Example #3: Check #46374

164. On May 1, 2024, Respondent issued check #46374 to Respondent in the amount of $565.05.

165. However, Respondent's trust account records show that only $384.32 in client fee payments were recorded on Respondent's client ledgers for this check.

166. Respondent disbursed the remaining $180.84 to Respondent without entitlement to the funds.

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Example #4: Check #46617

167. On November 22, 2024, Respondent issued trust account check #46617 to Respondent in the amount of $993.48

168. However, Respondent's trust account records show that only $551.74 in client fee payments were recorded on Respondent's client ledgers for this check.

169. Respondent disbursed the remaining $441.74 to Respondent without entitlement to the funds.

Example #5: Client B.C.

170. Respondent also collected funds from Respondent's trust account to which Respondent was not entitled by overbilling clients.

171. For example, on April 26, 2024, Respondent collected a fee payment of $125.22 from client B.C. to which Respondent was not entitled.

172. Respondent had already collected all fees then due to Respondent from B.C. on April 17, 2024.

173. Respondent was not due an additional $125.22 in fees from B.C. on April 26, 2024.

Example #6: Client M.W.

174. On September 24, 2024, Respondent collected $683.26 in fees from M.W.

175. Respondent was only entitled to $25.33 in fees from M.W. at that time.

176. Respondent collected $657.93 in fees from M.W. on September 24, 2024, to which Respondent was not entitled.

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Example #7: Client D.W.

177. On September 24, 2024, Respondent collected $177.06 in fees from D.W. to which Respondent was not entitled.

178. Respondent had already collected all fees then due to Respondent from D.W. on September 13, 2024.

179. Respondent was not due an additional $177.06 in fees from D.W. on September 24, 2024.

Example #8: Client R.L.

180. On September 24, 2024, Respondent collected $155.33 in fees from R.L. to which Respondent was not entitled.

181. Respondent had already collected all fees then due to Respondent from R.L. on September 13, 2024.

182. Respondent was not due an additional $155.33 in fees from R.L. on September 24, 2024.

Example #9: Client D.L.

183. On September 24, 2024, Respondent collected $27.75 in fees from D.L. to which Respondent was not entitled.

184. Respondent had already collected all fees then due to Respondent from D.L. on September 13, 2024.

185. Respondent was not due an additional $27.75 in fees from R.L. on September 24, 2024.

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Respondent's repayment of converted funds

186. On February 21, 2025, Respondent issued check #10500 drawn on Respondent's operating account in the amount of $4,635.64.

187. The memo for check #10500 in Respondent's QuickBooks file states the check was issued to: "Repay IOLTA fees."

188. Respondent deposited this check into Respondent's trust account on or about February 24, 2025.

189. Respondent deposited these funds to reimburse clients for fee payments Respondent had previously collected from the trust account without entitlement.

190. Respondent's client ledgers falsely identify the source of these funds as L&I.

Rounding

191. During the audit period, in disbursing funds owed to clients each month, Respondent rounded the amount owed to each pension client to a flat dollar amount.

192. Respondent's rounding process resulted in some clients receiving lesser payments than they were owed and others more than they were owed.

Reconciliations

193. During the audit period, Respondent failed to accurately reconcile Respondent's trust account check register balance to the combined total of all client ledger records.

194. During the audit period, Respondent's trust account reconciliations were performed by Minar Northey.

195. In performing reconciliations during the audit period, Minar Northey did not use an accurate figure for the total client ledger balance.

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196. In addition to using an inaccurate total client ledger balance, Minar Northey further adjusted the total client ledger balance up or down each month to force it into balance with the trust account check register.

197. For example, in performing the January 2025 reconciliation for Respondent's trust account, Minar Northey used $7,274.63 as the total of the client ledger balances as of January 31, 2025.

198. This figure was incorrect.

199. The total of the client ledger balances as of January 31, 2025, was $8,717.91.

200. Minar Northey then further adjusted the total client ledger balance by subtracting $2,495.69.

201. The $2,495.69 figure does not correspond to any disbursement of funds from the trust account.

202. As of January 31, 2025, Respondent's trust account check register balance, after subtracting outstanding checks, was $4,778.94, which did not match the combined total client ledger balance of $8,717.91.

203. However, by using an incorrect total client ledger balance of $7,274.63 and making an additional downward adjustment of $2,495.69, Minar Northey made it appear as though the balances reconciled at $4,778.94.

204. Through these practices, Minar Northey produced inaccurate reconciliation reports showing the trust account register balance matched the total client ledger balance when it did not.

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205. Despite receiving monthly reports reflecting the improper reconciliations, Respondent took no corrective action to bring Minar Northey's practices into compliance with the RPC.

COUNT 8

206. By submitting one or more false statements to ODC regarding Respondent's withdrawal of Respondent's funds from Respondent's trust account in 2016, Respondent violated RPC 8.4(c), RPC 8.4(d), and/or RPC 8.4(*l*) (by violating ELC 5.3(g)).

COUNT 9

207. By submitting one or more false statements to ODC and/or a Review Committee of the Disciplinary Board regarding Respondent's practice of issuing post-dated checks to clients, Respondent violated RPC 8.4(c) and/or RPC 8.4(d).

COUNT 10

208. By disbursing funds from Respondent's trust account before Respondent received the corresponding deposits during the period from December 1, 2017, to January 31, 2020, Respondent violated RPC 1.15A(h)(7).

COUNT 11

209. By disbursing funds to clients in excess of the funds the clients had on deposit in Respondent's trust account during the period from December 1, 2017, to January 31, 2020, Respondent violated RPC 1.15A(h)(8).

COUNT 12

210. By failing to maintain complete and accurate client ledgers during the period from January 1, 2024, to April 30, 2025, Respondent violated RPC 1.15B(a)(2).

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COUNT 13

211. By withdrawing client funds from trust to which Respondent was not entitled, for Respondent's own use, during the period from January 1, 2024, to April 30, 2025, Respondent violated RPC 1.15A(b) and/or RPC 1.15A(c)(1).

COUNT 14

212. By failing to properly reconcile the trust account check register balance to the combined total of all client ledgers during the period from January 1, 2024, to April 30, 2025, Respondent violated RPC 1.15A(h)(6).

COUNT 15

213. By failing to make reasonable efforts to supervise Minar Northey during the period from January 1, 2024, to April 30, 2025, Respondent violated RPC 5.3(a) and/or RPC 5.3(b).

THEREFORE, Disciplinary Counsel requests that a hearing be held under the Rules for Enforcement of Lawyer Conduct. Possible dispositions include disciplinary action, probation, restitution, and assessment of the costs and expenses of these proceedings.

Dated July 23, 2025.

F. Rodriguez

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