

FILED

Oct 15, 2025

Disciplinary
Board

Docket # 018

DISCIPLINARY BOARD
WASHINGTON STATE BAR ASSOCIATION

In re

SUELLEN HOWARD,

Lawyer (Bar No. 20506).

Proceeding No. 25#00004

ODC File No(s). 23-01839

STIPULATION TO REPRIMAND

Under Rule 9.1 of the Washington Supreme Court's Rules for Enforcement of Lawyer Conduct (ELC), the following Stipulation to Reprimand is entered into by the Office of Disciplinary Counsel (ODC) of the Washington State Bar Association (Association) through disciplinary counsel Francesca D'Angelo and Respondent lawyer Suellen Howard.

Respondent understands that Respondent is entitled under the ELC to a hearing, to present exhibits and witnesses on Respondent's behalf, and to have a hearing officer determine the facts, misconduct and sanction in this case. Respondent further understands that Respondent is entitled under the ELC to appeal the outcome of a hearing to the Disciplinary Board, and, in certain cases, the Supreme Court. Respondent further understands that a hearing and appeal could result in an outcome more favorable or less favorable to Respondent. Respondent chooses to resolve this proceeding now by entering into the following stipulation to facts, misconduct and sanction to

1 avoid the risk, time, and expense attendant to further proceedings.

2 **I. ADMISSION TO PRACTICE**

- 3 1. Respondent was admitted to practice law in the State of Washington on June 3, 1991.

4 **II. STIPULATED FACTS**

5 1. In October 2022, Client A hired Respondent to finalize Client A's dissolution by
6 attending mediation and completing the final dissolution paperwork.

7 2. Respondent did not enter into a written fee agreement with Client A.

8 3. In early October 2022, Respondent received \$2,500 from Client A.

9 4. At the time Respondent collected the \$2,500 payment, Respondent had not earned
10 any portion of the advance fee.

11 5. Respondent treated the funds as a flat fee.

12 6. Respondent did not deposit any of the funds into a trust account.

13 7. Respondent eventually earned the \$2,500 fee.

14 8. After the representation concluded, Client A requested their client file from
15 Respondent.

16 9. Respondent provided Client A with a copy of the physical records from Client A's
17 client file.

18 10. Respondent inadvertently provided Client A with documents containing information
19 related to the representation of one or more clients in matters unrelated to Client A's matter.

20 11. Respondent did not obtain informed consent of the clients whose information was
21 disclosed.

22 12. Respondent was not impliedly authorized to disclose the documents in order to carry
23 out the representations of the other clients.

1 **III. STIPULATION TO MISCONDUCT**

2 13. By failing to deposit client A's advance fees in a trust account, Respondent violated
3 RPC 1.15A(c)(2).

4 14. By disclosing information related to the representation of one or more clients, without
5 each of the clients' informed consent or any applicable exceptions permitting the disclosure(s),
6 Respondent violated RPC 1.6(a).

7 **IV. PRIOR DISCIPLINE**

8 15. In July 2013, Respondent received a reprimand for conduct violating RPC 8.4(d), RPC
9 8.4(c) and RPC 3.1.3(a)(1). The conduct involved filing a pleading purportedly signed under
10 penalty of perjury by a client, without the client's authorization or actual signature.

11 **V. APPLICATION OF ABA STANDARDS**

12 16. The following American Bar Association Standards for Imposing Lawyer Sanctions
13 (1991 ed. & Feb. 1992 Supp.) apply to this case:

14 17. ABA Standard 4.2 is applicable to a lawyer's duty to preserve client confidences.

15 ***4.2 Failure to Preserve the Client's Confidences***

16 4.21 Disbarment is generally appropriate when a lawyer, with the intent to
17 benefit the lawyer or another, knowingly reveals information relating to
18 representation of a client not otherwise lawfully permitted to be disclosed,
19 and this disclosure causes injury or potential injury to a client.

18 4.22 Suspension is generally appropriate when a lawyer knowingly reveals
19 information relating to the representation of a client not otherwise lawfully
20 permitted to be disclosed, and this disclosure causes injury or potential
21 injury to a client.

20 4.23 Reprimand is generally appropriate when a lawyer negligently reveals
21 information relating to representation of a client not otherwise lawfully
22 permitted to be disclosed and this disclosure causes injury or potential
23 injury to a client.

22 4.24 Admonition is generally appropriate when a lawyer negligently reveals
23 information relating to representation of a client not otherwise lawfully
24 permitted to be disclosed and this disclosure causes little or no actual or
25 potential injury to a client.

1 18. Respondent acted negligently.

2 19. There was potential injury to the clients whose information was revealed.

3 20. The presumptive sanction under ABA Standard 4.2 is reprimand.

4 21. ABA Standard 4.1 applies to Respondent's failure to put advanced fees into trust.

5 *4.1 Failure to Preserve the Client's Property*

6 4.11 Disbarment is generally appropriate when a lawyer knowingly converts
7 client property and causes injury or potential injury to a client.

8 4.12 Suspension is generally appropriate when a lawyer knows or should know
9 that he is dealing improperly with client property and causes injury or
10 potential injury to a client.

11 4.13 Reprimand is generally appropriate when a lawyer is negligent in dealing
12 with client property and causes injury or potential injury to a client.

13 4.14 Admonition is generally appropriate when a lawyer is negligent in dealing
14 with client property and causes little or no actual or potential injury to a
15 client.

16 22. Respondent should have known that Respondent was handling client funds
17 incorrectly.

18 23. The client was potentially injured because the client's funds were not safeguarded.

19 24. The presumptive sanction under ABA Standard 4.1 is suspension.

20 25. The following aggravating factors apply under ABA Standard 9.22:

21 (a) prior disciplinary offense; and

22 (i) substantial experience in the practice of law.

23 26. The following mitigating factors apply under ABA Standard 9.32:

24 (a) absence of a dishonest or selfish motive;

25 (b) remorse.

26 27. It is an additional mitigating factor that Respondent has agreed to resolve this matter
27 at an early stage of the proceedings.

1 28. On balance, the aggravating and mitigating factors support a sanction of reprimand.

2 **VI. STIPULATED DISCIPLINE**

3 29. The parties stipulate that Respondent shall receive a reprimand.

4 **VII. CONDITIONS OF PROBATION**

5 30. Respondent will be subject to probation for a period of six months beginning when
6 this stipulation receives final approval and shall comply with the specific probation terms set forth
7 below:

8 31. During the period of probation, Respondent shall use fee agreements for all clients.

9 32. During the period of probation, Respondent shall, by no later than the last day of each
10 month, provide ODC with a copy of all fee agreements for clients engaged during that month. If
11 no new clients have been engaged during the month, Respondent shall provide a statement stating
12 that no new clients have been engaged during the month.

13 33. During the period of probation, Respondent shall participate in two 30-minute office
14 management consultations with the Practice Management Advisor or designee. The Practice
15 Management Advisor is currently Margeaux Green, who can be reached at
16 margeauxg@wsba.org.

17 34. Respondent shall contact the Practice Management Advisor to schedule a consultation
18 within 30 days of the approval of this stipulation.

19 35. Respondent shall consult with the Practice Management Advisor to discuss and
20 implement procedures concerning some or all of the following issues:

- 21
 - Dealing with clients and managing their expectations;
 - 22 • Fee agreements;
 - Office layout and organization; and
 - 23 • Winding down law practice.

36. Respondent understands that the Practice Management Advisor may establish dates by which Respondent must comply with recommendations made and for follow-up communication. Respondent agrees to strictly comply with these dates. These subsequent contacts may be in person, email, or telephone, at the sole discretion of the Practice Management Advisor.

37. Respondent authorizes the Practice Management Advisor to report immediately to the Probation Administrator and/or ODC if Respondent fails to comply with any requirements or terms.

38. Respondent agrees to respond promptly to all inquiries from the Practice Management Advisor and the Probation Administrator regarding Respondent's compliance with the practice management requirements described herein.

VIII. RESTITUTION

39. No restitution is required by this stipulation.

IX. COSTS AND EXPENSES

40. In light of Respondent's willingness to resolve this matter by stipulation at an early stage of the proceedings, Respondent shall pay attorney fees and administrative costs of \$750 in accordance with ELC 13.9(i). The Association will seek a money judgment under ELC 13.9(l) if these costs are not paid within 30 days of approval of this stipulation.

X. VOLUNTARY AGREEMENT

41. Respondent states that prior to entering into this Stipulation Respondent had an opportunity to consult independent legal counsel regarding this Stipulation, that Respondent is entering into this Stipulation voluntarily, and that no promises or threats have been made by ODC, the Association, nor by any representative thereof, to induce the Respondent to enter into this

1 Stipulation except as provided herein.

2 42. Once fully executed, this stipulation is a contract governed by the legal principles
3 applicable to contracts, and may not be unilaterally revoked or modified by either party.

4 **XI. LIMITATIONS**

5 43. This Stipulation is a compromise agreement intended to resolve this matter in
6 accordance with the purposes of lawyer discipline while avoiding further proceedings and the
7 expenditure of additional resources by the Respondent and ODC. Both the Respondent lawyer
8 and ODC acknowledge that the result after further proceedings in this matter might differ from
9 the result agreed to herein.

10 44. This Stipulation is not binding upon ODC or the respondent as a statement of all
11 existing facts relating to the professional conduct of the Respondent, and any additional existing
12 facts may be proven in any subsequent disciplinary proceedings.

13 45. This Stipulation results from the consideration of various factors by both parties,
14 including the benefits to both by promptly resolving this matter without the time and expense of
15 hearings, Disciplinary Board appeals, and Supreme Court appeals or petitions for review. As
16 such, approval of this Stipulation will not constitute precedent in determining the appropriate
17 sanction to be imposed in other cases; but, if approved, this Stipulation will be admissible in
18 subsequent proceedings against Respondent to the same extent as any other approved Stipulation.

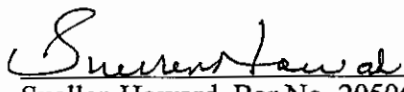
19 46. Under ELC 3.1(b), all documents that form the record before the Hearing Officer for
20 Hearing Officer's review become public information on approval of the Stipulation by the
21 Hearing Officer, unless disclosure is restricted by order or rule of law.

22 47. If this Stipulation is approved by the Hearing Officer, it will be followed by the
23 disciplinary action agreed to in this Stipulation. All notices required in the Rules for Enforcement

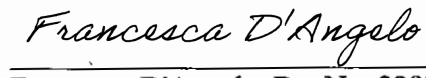
1 of Lawyer Conduct will be made.

2 48. If this Stipulation is not approved by the Hearing Officer and Supreme Court, this
3 Stipulation will have no force or effect, and neither it nor the fact of its execution will be
4 admissible as evidence in the pending disciplinary proceeding, in any subsequent disciplinary
5 proceeding, or in any civil or criminal action.

6 WHEREFORE the undersigned being fully advised, adopt and agree to this Stipulation to
7 Reprimand as set forth above.

8 
9 Suellen Howard, Bar No. 20506
Respondent

Dated: 10/14/25

10 
11 Francesca D'Angelo, Bar No. 22979
12 Managing Disciplinary Counsel

Dated: 10/14/2025