

IN DISCIPLINARY DISTRICT III  
OF THE  
BOARD OF PROFESSIONAL RESPONSIBILITY  
OF THE  
SUPREME COURT OF TENNESSEE

FILED

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BOARD OF PROFESSIONAL  
RESPONSIBILITY

RW

EXEC. SECRETARY

IN RE: LISA ZARZOUR BOWMAN,  
BPR No. 17972, Respondent,  
an Attorney Licensed to Practice  
Law in Tennessee  
(Hamilton County)

DOCKET NO. 2016-2625-3-AW

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ORDER OF THE HEARING PANEL

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The Hearing Panel, following the conclusion of the proof on May 18, 2017, finds as follows:

**PROCEDURAL HISTORY**

1. This is a disciplinary proceeding against the Respondent, Lisa Zarzour Bowman, an attorney licensed to practice law in Tennessee in 1996.
2. The Petition for Discipline, Docket No. 2016-2625-3-AW, was filed August 24, 2016, and served upon Ms. Bowman.
3. On October 13, 2016, Ms. Bowman filed her Answer to Petition for Discipline.
4. On October 25, 2016, the Hearing Panel was appointed.
5. A pre-hearing Case Management Conference was held on November 29, 2016, and a Scheduling Order was entered December 19, 2016, setting the Final Hearing for March 31, 2017.
6. On February 15, 2017, Ms. Bowman filed a Motion to Strike, Dismiss and for Summary Judgment.

7. On March 6, 2017, an Amended Scheduling Order was entered resetting the Final Hearing for May 18, 2017.
8. On March 17, 2017, the Board filed a Response and Memorandum in Opposition to Motion for Summary Judgment.
9. On March 24, 2017, Ms. Bowman filed a Reply to the Board's Response in Opposition to Motion to Strike, Dismiss and for Summary Judgment and filed a Supplemental Reply on April 7, 2017.
10. On May 4, 2017, Ms. Bowman filed her Witness List.
11. On May 9, 2017, Ms. Bowman filed her Exhibit List, Pre-Trial Brief and Motion in Limine.
12. On May 9, 2017, the Board filed its Pre-Trial Brief and Witness and Exhibit List.
13. On May 10, 2017, the Hearing Panel entered an Order allowing the depositions of Ms. Bowman and Ms. Denayer to be considered for purposes of ruling on the pending motions.
14. On May 10, 2017, the Hearing Panel entered an Order granting summary judgment on the allegation of a violation of Rules of Professional Conduct (RPC) 1.7 and denying the remaining portions of the Motion to Strike, Dismiss and for Summary Judgment.
15. On May 12, 2017, Ms. Bowman filed a Rule 56.04 Motion.
16. On May 15, 2017, Ms. Bowman filed an Objection to Exhibit List and Witness List.
17. On May 16, 2017, the Board filed a Motion in Limine and Memorandum in Support to Exclude Expert Opinion Testimony.
18. On May 17, 2017, Ms. Bowman filed a Response to Motion in Limine to Exclude Expert Opinion Testimony.

19. On May 17, 2017, Ms. Bowman filed a Motion for Recusal.

20. On May 17, 2017, the Hearing Panel entered its Order on Rule 56.04 Motion.

21. The Final Hearing was held May 18, 2017, before a duly constituted Hearing Panel consisting of L. Blair Bennington Cannon, Stephen Davis Crump and chaired by Philip McCarroll Jacobs. Ms. Bowman was represented by John P. Konvalinka, and the Board was represented by A. Russell Willis.

22. At the close of the proof, the Board moved to amend the pleadings to conform to the evidence pursuant to Rule 15.02 of the Rules of Civil Procedure.

23. The Board moved to enter deposition of Bowman into evidence.

24. Bowman objected, and filed an objection to Petitioner's submission of Respondent's deposition

### **INTRODUCTION**

25. The Petition for Discipline consists of one (1) complaint alleging Ms. Bowman (a) failed to reasonably respond to Ms. Denayer's request to discuss the waiver of conflict document sent to Ms. Denayer in September, 2012; (b) failed to prepare and file with the Court an Order adopting the mediated child visitation agreement executed by Ms. Denayer and her husband on January 3, 2013; (c) failed, over a period of approximately nine (9) months, to promptly prepare a Final Decree of Divorce after announcing an agreement to the Court at the final hearing on January 14, 2014; (d) over a period of approximately fifteen (15) months failed to promptly file a Final Decree of Divorce after announcing an agreement to the Court at the final hearing on January 14, 2014; (e) failed to reasonably communicate with Ms. Denayer regarding changes Ms. Bowman made in the Final Decree of Divorce previously approved by Ms. Denayer and (f) filed a Final Decree of Divorce Ms. Denayer had not approved which

omitted a material term negotiated by Ms. Denayer with her husband in violation of the Rules of Professional Conduct (RPC) 1.3 (diligence); 1.4 (communication); 3.2 (expediting litigation) and 8.4 (misconduct).

26. The Petitioner is required to prove its case by a preponderance of the evidence.

27. In its case in chief, the Board called Michelle Denayer and Robin Rubin Flores as witnesses.

28. In her case in chief, Ms. Bowman testified on her own behalf and called Jacqueline Bolton and Jennifer Lawrence as her witness.

29. The testimony and evidence presented to the Hearing Panel established the following facts:

#### **FINDINGS OF FACTS**

30. On or about July 13, 2012, Ms. Denayer retained Ms. Bowman to prosecute an action for divorce and executed a retainer agreement. (Exhibit 1)

31. Bowman drafted and filed a complaint, she prepared a motion for temporary support, a temporary proposed parenting plan, and a permanent parenting plan.

32. Ms. Bowman did not meet face to face or discuss the retainer agreement with Ms. Denayer before its execution.

33. After being retained in July, 2012, Ms. Bowman did not meet face to face or speak with Ms. Denayer until the parties attended mediation on January 3, 2013, approximately six (6) months after being retained.

34. Bowman represented Denayer during the mediation and Denayer stated that Bowman performed well at the mediation.

35. On or about September 29, 2012, Ms. Denayer received a letter and a conflict waiver from Ms. Bowman notifying Ms. Denayer that opposing counsel in the divorce action would be sharing office space with Ms. Bowman and requesting Ms. Denayer execute the enclosed Waiver of Conflict. (Exhibit 29, p. 71)

36. Ms. Denayer received the Waiver of Conflict and attempted to contact Ms. Bowman to discuss the potential conflicts she was being requested to waive; however, Ms. Bowman did not return Ms. Denayer's calls.

37. Ms. Denayer signed the waiver on October 15, 2012, without any conversation with Ms. Bowman.

38. On January 3, 2013, the parties participated in mediation and agreed to the terms of a child visitation agreement. (Exhibit 2)

39. Ms. Denayer testified that Ms. Bowman represented the executed mediated visitation agreement would be filed with the Court and, if approved, would govern the child visitation rights of the parties until the final hearing.

40. Ms. Bowman was responsible for preparing the Order to approve the mediated visitation agreement and filing the Order and the mediated agreement with the Court.

41. Ms. Bowman's itemized billing statement reflects she prepared the Order adopting the mediated agreement on January 4, 2013. (Exhibit 11)

42. On January 9, 2013, Ms. Bowman sent a proposed Order adopting the mediated agreement to opposing counsel and requested he execute and return to Ms. Bowman for filing. (Exhibit 12)

43. According to Ms. Bowman, and corroborated by the court's docket sheet, she did not file the Order or the mediated agreement with the trial court, and an order approving the

mediated agreement was never entered by the court. (Exhibit 29, pp. 30-31; Exhibit 20; Exhibit 21)

44. Ms. Denayer's husband did not abide by the visitation schedule set forth in the mediated agreement, and she raised the issue of enforcement with Ms. Bowman.

45. Ms. Denayer testified she was advised by Ms. Bowman that the visitation issue would have to be addressed at the final hearing.

46. A final hearing on the divorce was scheduled for January 14, 2014.

47. The parties did reach a full resolution of the divorce action.

48. Thereafter, Ms. Bowman and opposing counsel, outside of the presence of the parties, appeared in open court on January 14, 2014, and announced that they had an agreement to the judge, but not the terms.

49. The announcement to the trial court was not transcribed by a court reporter, and no written transcript or agreement exists.

50. Denayer communicated with six individuals on Bowman's staff during her divorce action.

51. Bowman supervised her staff and employees and gave them instructions to communicate to clients.

52. From January 14, 2014, to August 26, 2014, Ms. Bowman made no effort to prepare a draft Final Decree incorporating the agreement announced to the trial court, and in fact, the first draft of a Final Decree prepared by Ms. Bowman was October 30, 2014. (Exhibits 11 and 14)

53. On August 26, 2014, Ms. Bowman transmitted to Ms. Denayer a Final Decree prepared by opposing counsel. (Exhibit 3)

54. Ms. Bowman requested Ms. Denayer review the proposed Final Decree and Parenting Plan and, if she approved, sign the Parenting Plan and return to Ms. Bowman for execution.

55. Ms. Denayer reviewed and noted numerous changes to the Final Decree and the Parenting Plan and returned the same to Ms. Bowman by letter dated August 29, 2014. (Exhibits 3 & 4)

56. On September 26, 2014, Ms. Bowman sent a second proposed Final Decree and Parenting Plan to Ms. Denayer and requested she review and advise of any needed changes or corrections. (Exhibit 5)

57. On October 2, 2014, Ms. Denayer provided her comments on the proposed Final Decree and Parenting Plan to Ms. Bowman. (Exhibit 6)

58. The proposed Final Decree Ms. Denayer reviewed and approved on October 2, 2014, provided that her husband would be responsible for debts he incurred since the 2010 separation despite his filing of bankruptcy. (Exhibit 5, para. 9)

59. On October 17, 2014, an unsigned Proposed Final Decree was filed by opposing counsel which did not contain the agreed provision that Ms. Denayer's husband would be responsible for debts he incurred since the 2010 separation despite his filing of bankruptcy. (Exhibits 13, 20 and 21)

60. On October 30, 2014, Ms. Bowman filed a Final Decree executed by Ms. Bowman but not opposing counsel which contained the provision that Ms. Denayer's husband would be responsible for debts he incurred since the 2010 separation despite his filing of bankruptcy. (Exhibits 14, 20 and 21)

61. Both Exhibit 13 and 14 contain a December 8, 2014 notation by the Court that attorneys were to submit an agreed order, and neither Final Decree was signed by the Court.

62. Neither Exhibit 13 nor 14, contain a Permanent Parenting Plan executed by the parties.

63. Ms. Denayer was not advised by Ms. Bowman of the filing of either Exhibit 13 or 14.

64. In fact, after September 26, 2014, Ms. Denayer did not receive any communications from Ms. Bowman until an email of March 9, 2015, arrived regarding a Motion filed by opposing counsel to terminate child support. (Exhibit 27)

65. According to Ms. Denayer, between January 2014, and March 26, 2015, she made a number of inquiries about the continuing delay in finalizing her divorce and received no adequate explanation from Ms. Bowman or her staff for the delay.

66. As a result of the lack of communication and progress on her divorce, Ms. Denayer hand delivered a letter of termination to Ms. Bowman on March 26, 2015. (Exhibit 15)

67. Shortly thereafter, Ms. Denayer retained new counsel, Robin Flores, to complete her divorce.

68. Upon being retained, Mr. Flores immediately reviewed the court's file and discovered the entry of a Final Decree dated March 26, 2015.

69. Mr. Flores notified Ms. Denayer of the recent filing and described her reaction to the information as surprised.

70. Mr. Flores identified the Local Rules of Civil Practice for the Chancery and Circuit Courts for Hamilton as a set of rules governing the practice of law in each court and the same was introduced as an exhibit. (Exhibit 18)



71. Mr. Flores testified that the Local Rules are mandatory rules that must be followed unless relief from the Court is obtained.

72. Pursuant to Local Rule 5.01, Orders are required to be prepared and forwarded to opposing within five (5) business days of the hearing or trial.

73. Rule 5.01 further provides that if counsel fails to prepare and lodge Orders with the Court within fourteen (14) days of the announcement of an agreement or a ruling, the Court may strike or dismiss the subject motion or pleading.

74. On March 25, 2015, Ms. Bowman filed a Final Decree with the Circuit Court for Hamilton County, signed by counsel for the parties but not by Ms. Denayer or her husband. (Exhibit 26)

75. According to Ms. Bowman, the Final Decree filed on March 25, 2015, was the result of her negotiations with opposing counsel.

76. Ms. Bowman admitted she executed and filed the negotiated Final Decree on March 25, 2015, without the prior knowledge or consent of Ms. Denayer.

77. Ms. Denayer testified she was unaware of any Final Decree being filed and never approved the March 25, 2015 Final Decree or authorized Ms. Bowman to execute and file the Final Decree.

78. The Final Decree filed March 25, 2015, differed materially from the Final Decree Ms. Denayer approved on October 2, 2014, as it did not contain the agreed language that Ms. Denayer's husband would be responsible for debts he incurred since the 2010 separation despite his filing of bankruptcy.

79. From the announcement to the Court that the parties had an agreement on January 14, 2014, until the entry of the Final Decree by the Court on March 26, 2015, was a period of nearly fifteen (15) months.

80. According to Ms. Bowman, she was unable to prepare a Final Decree for nine (9) months or file a Final Decree with the Court for nearly fifteen (15) months after the January 14, 2014, settlement because of several factors including, being out of the office for several days after undergoing eye surgery shortly after January 14, 2014; a leave of absence taken by Judge Thomas from April, 2014, until approximately August, 2014; personal health issues related to blood pressure and transient ischemic attacks which she began experiencing in 2013; and she had a very busy practice and had a lot going on. (Exhibit 29, pp. 49-50, 53)

81. According to Ms. Bowman, the above factors did not prevent her from maintaining her work schedule and handling other clients' matters in a timely manner.

82. Ms. Bowman never disclosed to Ms. Denayer that personal health issues, other clients' matters or a leave of absence by Judge Thomas prevented Ms. Bowman from preparing a Final Decree until October 30, 2014, or filing a Final Decree until March 25, 2015.

83. Ms. Bowman told her client, her negotiations on January 13, 2014 were binding, despite no sworn announcement being made to the Court.

84. Ms. Denayer testified she informed Ms. Bowman on several occasions that she wanted her divorce finalized as soon as possible and further testified she would have hired new counsel had Ms. Bowman's difficulties and inabilities been disclosed to her.

85. On August 27, 2015, Ms. Bowman, with the consent of Ms. Denayer, filed a Motion to Alter or Amend the Final Decree to correct the errors and omissions contained in the Final Decree filed March 26, 2015. (Exhibit 9)

86. On October 16, 2015, the Court entered an Order amending the Final Judgment entered March 26, 2015, to include the material language Ms. Denayer had negotiated with her husband. (Exhibit 10)

87. Denayer received everything she reasonably wanted in the amended final divorce decree.

88. Denayer admitted that she suffered no detriment from Bowman's representation except the passage of time, and, due to the passage of time, received a benefit in the form of child support in excess to what she would have been entitled had the final order been entered earlier.

89. Denayer complained there was no allocation of certain credit card indebtedness that she wanted allocated to her husband in the non-amended final divorce decree.

90. Prior to the initiation of any divorce proceeding, there was a judgment awarded against Denayer for the amount of the credit card indebtedness, of which Denayer claimed that she was unaware.

91. Denayer admitted that Bowman filed a Rule 60 motion to amend the final decree to include an allocation of the credit card indebtedness and that the allocation of the credit card indebtedness was included in the amended final decree.

92. Denayer admitted that this allocation of the credit card indebtedness in the final decree did not resolve her issue with the credit card indebtedness or its consequences. In fact, the bankruptcy of her husband and the discovery of the judgment caused Denayer to file bankruptcy also. Denayer was discharged from her debts, including the credit card indebtedness and the amounts owed to Bowman.

93. The opposing counsel in Denayer's underlying case, which was the matter at issue in the Petition, was Alan Beard.

94. It is the experience of attorneys practicing domestic law in Chattanooga that it is a common problem to expedite litigation when Alan Beard is opposing counsel.

95. It is the experience of attorneys practicing domestic law in Chattanooga that, even when there is an agreement between the parties, Alan Beard delays a resolution in divorce cases for many months.

96. Denayer's underlying case was adjudicated in Division IV of the Circuit Court of Hamilton County.

97. Judge Thomas took medical leave in April and was vacant from the bench until September or October of 2014.

98. During Judge Thomas's absence, no other judge in Hamilton County would hear a contested case that was pending before Judge Thomas, a fact that was not communicated to Ms. Denayers.

99. Prior to the intervention in April of 2014, a case garnering significant publicity regarding the death of two young adults from Chattanooga took place over three weeks in Judge Thomas's courtroom during late January and early February of 2014.

100. It was the experience of attorneys practicing in Hamilton County that Judge Thomas would not handle any other matters during the lead up and pendency of this trial.

101. The parties were not able to announce the agreement to the Court on January 14, 2014 because the Court would not hear them due to the impending trial of the previously discussed unrelated tort case.

102. Beard continued the case, on his Motion, seven times until March 2015.

103. Bowman strategically did not file the final divorce decree based on her reasonable perception of her client's wishes and the circumstances occurring in Division IV during the time period of the underlying case.

104. Bowman's staff helped and supported Bowman throughout this time period.

105. After submitting a complaint to the Board of Professional Responsibility, Denayer hired Bowman again and signed a second retainer agreement with Bowman to file a motion to alter or amend the court's order. Bowman filed the motion and corrected the order exactly how Denayer requested.

#### **CONCLUSIONS OF LAW**

106. The Respondent, Lisa Zarzour Bowman, is an attorney admitted by the Supreme Court of Tennessee to practice law in the State of Tennessee in 1996. Ms. Bowman's most recent address as registered with the Board of Professional Responsibility is 23 Patten Parkway, Chattanooga, TN 37402-2211, being in Disciplinary District III. The Respondent's Board of Professional Responsibility number is 17972.

107. Pursuant to Tenn. Sup. Ct. R. 9, § 8 (2014), attorneys admitted to practice law in Tennessee are subject to the disciplinary jurisdiction of the Supreme Court, the Board of Professional Responsibility, the Hearing Committee, hereinafter established, and the Circuit and Chancery Courts.

108. Pursuant to Tenn. Sup. Ct. R. 9, § 1 (2014), the license to practice law in this state is a privilege, and it is the duty of every recipient of that privilege to conduct himself or herself at all times in conformity with the standards imposed upon members of the bar as conditions for the privilege to practice law.

109. Pursuant to Tenn. Sup. Ct. R. 9, § 11 (2014), acts or omissions by an attorney, individually or in concert with any other person, which violate the Rules of Professional Conduct of the State of Tennessee constitute misconduct and grounds for discipline, whether or not the act or omission occurred in the course of an attorney-client relationship.

110. The Rules of Professional Conduct (RPC) require lawyers to act with reasonable diligence and promptness in their representation of clients (RPC 1.3) and make reasonable efforts to expedite litigation. (RPC 3.2). Reasonable is defined as the conduct of a reasonably prudent and competent lawyer (RPC 1.0(f)) and taken together, the rules required Ms. Bowman to pursue Ms. Denayer's legal matter with commitment, dedication and zeal despite personal inconvenience, opposition or obstructions. (RPC 1.3, Comment1).

111. Based upon the evidence presented, the Hearing Panel finds by a preponderance of the evidence that Lisa Zarzour Bowman unreasonably delayed filing any order or motion to enforce the mediated agreement reached by the parties on January 3, 2013.

112. Based upon the evidence presented, the Hearing Panel finds by a preponderance of the evidence that Lisa Zarzour Bowman unreasonably delayed the preparation of Ms. Denayer's Final Decree of Divorce for a period of approximately nine (9) months in violation of RPC 1.3 (diligence) and 3.2 (expediting litigation).

113. Based upon the evidence presented, the Hearing Panel finds by a preponderance of the evidence that Lisa Zarzour Bowman unreasonably delayed the filing of Ms. Denayer's Final Decree of Divorce for a period of approximately fifteen (15) months in violation of RPC 1.3 (diligence) and 3.2 (expediting litigation).

114. The evidence presented leads the Panel to conclude that Ms. Bowman simply did not timely perform the work she was paid to perform and a client's interest can be adversely

affected by the passage of time. Even when the client's interests are not affected in substance, unreasonable delay can cause a client needless anxiety and undermine confidence in the lawyer's trustworthiness. (RPC 1.3, Comment 3)

115. Had Ms. Bowman promptly prepared and submitted the Final Decree of Divorce, it is reasonably likely Ms. Denayer's divorce would have been finalized before Judge Thomas took his leave of absence instead of nearly one (1) year later.

116. No agreement was announced to the Court, only that an agreement "had been reached." Under the circumstances, until a written Final Decree of Divorce was executed by the parties, Ms. Denayer was at risk that her husband would repudiate.

117. RPC 1.4 required Ms. Bowman: (1) to promptly inform Ms. Denayer of any decision or circumstance with respect to which the client's informed consent is required by the Rules of Professional Conduct; (2) to reasonably consult with Ms. Denayer about the means by which Ms. Denayer's objectives would be accomplished; (3) to keep Ms. Denayer reasonably informed about the status of her matter; (4) to promptly comply with reasonable requests for information; and (5) to explain matters to the extent reasonably necessary to permit Ms. Denayer to make informed decisions regarding her representation.

118. Ms. Bowman failed to notify Ms. Denayer of material changes Ms. Bowman made to the Final Decree of Divorce and failed to consult with Ms. Denayer and receive her approval regarding the material changes prior to submitting the Final Decree of Divorce to the Court on March 26, 2015, in violation of RPC 1.4 (communication).

119. Bowman caused no injury or potential injury to the justice system.

120. Bowman caused injury to Denayer by failing to timely prosecute the case and failing to communicate the circumstances that caused delay. Whether delays were unavoidable

or unforeseen, the delays should have been communicated to Denayer, so she would be informed.

121. Injury occurred to Ms. Denayer, because she had an open, unresolved case for over eighteen (18) months, following an alleged resolution with no explanation to her of the reason for delay, and little effort to effectuate a reasonable resolution.

#### APPLICATION OF THE ABA STANDARDS

122. Pursuant to Tenn. Sup. Ct. R. 9, § 8.4, the appropriate discipline must be based upon application of the ABA Standards for Imposing Lawyer Sanctions, (“ABA Standards”).

123. Based upon the facts and misconduct previously cited, the Hearing Panel finds the following ABA Standards applicable and relevant to its determination of the appropriate discipline to be imposed against Ms. Bowman:

4.41 Disbarment is generally appropriate when:

- (b) a lawyer knowingly fails to perform services for a client and causes serious or potentially serious injury to a client; or
- (c) a lawyer engages in a pattern of neglect with respect to client matters and causes serious or potentially serious injury to a client.

4.42 Suspension is generally appropriate when:

- (a) a lawyer knowingly fails to perform services for a client and causes injury or potential injury to a client, or
- (b) a lawyer engages in a pattern of neglect and causes injury or potential injury to a client.

124. The board did not consider any of Respondent’s deposition in rendering the following judgment. The Panel requests that the disposition of Bowman be stricken from the record.



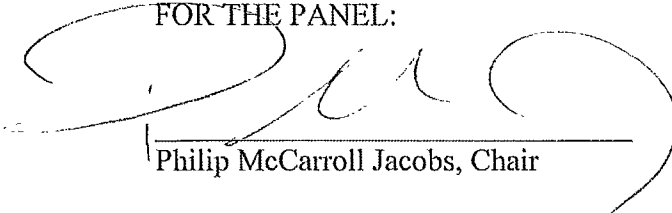
**JUDGMENT**

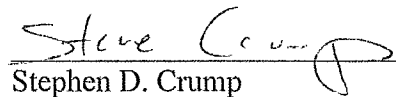
Based upon the facts in this case; the application of the Rules of Professional Conduct and considering the ABA Standards, the Hearing Panel finds by a preponderance of the evidence that Ms. Bowman committed disciplinary misconduct and should be suspended from the practice of law pursuant to Tenn. Sup. Ct. R. 9, § 12.2 for a period of one (1) year to be served on probation pursuant Tenn. Sup. Ct. R. 9, § 14.1. The grant of probation is further conditioned upon the appointment of a Practice Monitor in accordance with Tenn. Sup. Ct. R. 9, § 12.9 to review the office management practices of Ms. Bowman and address any deficiencies of Ms. Bowman related to (a) reasonable, timely and meaningful communications with clients and (b) timely preparation and filing of pleadings with the appropriate tribunal or agency.

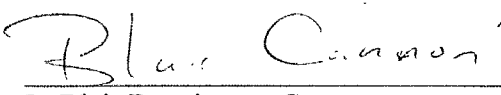
**NOTICE**

This judgment may be appealed pursuant to Tenn. Sup. Ct. R. 9, § 33 (2014) by filing a Petition for Review in the Circuit or Chancery Court within sixty (60) days of the date of entry of the hearing panel's judgment.

FOR THE PANEL:

  
Philip McCarroll Jacobs, Chair

  
Stephen D. Crump

  
L. Blair Bennington Cannon

with permission

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing has been sent to Respondent, Lisa Zarzour Bowman, 23 Patten Parkway, Chattanooga, TN 37402, and to her counsel, John P. Konvalinka, 633 Chestnut Street, Suite 900, Chattanooga, TN 37450, via U.S. First Class Mail, and hand-delivered to Disciplinary Counsel, Russell Willis, this the 6<sup>th</sup> day of October, 2017.

A handwritten signature in cursive script, appearing to read "Rita Webb", written over a horizontal line.

Rita Webb  
Executive Secretary