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

BOARD OF PROFESSIONAL
RESPONSIBILITY

REC'D EXEC. SEC.

In the Matter of)
JENNIFER ELIZABETH MEEHAN,) DOCKET NO: 2016-2614-0-WM (22.3)
BPR #22932, Respondent.)

Findings of Fact, Conclusions of Law, and Judgment of Disciplinary Hearing Panel

I. Introduction

This is a disciplinary proceeding initiated by a Petition for Final Discipline filed by the Disciplinary Counsel for the Tennessee Board of Professional Responsibility on August 10, 2016. Following Respondent Jennifer E. Meehan's conviction of one count of bank fraud under 18 U.S.C. §1344¹ via guilty plea in the Northern District of Alabama, Petitioner Disciplinary Counsel seeks disbarment under Tennessee Supreme Court Rule 9, section 22.3(c). Following appointment of a three-member disciplinary hearing panel, proceedings were held on January 25 and July 31, 2017, at which Respondent Meehan called numerous witnesses in opposition to the final discipline of disbarment sought by Petitioner Disciplinary Counsel. Following the evidentiary hearing, the parties submitted proposed findings and conclusions on August 21, 2017, and Respondent submitted a response on August 29, 2017. This document constitutes the

¹ "Whoever knowingly executes, or attempts to execute, a scheme or artifice—

(1) to defraud a financial institution; or

(2) to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution, by means of false or fraudulent pretenses, representations, or promises;

shall be fined not more than \$1,000,000 or imprisoned not more than 30 years, or both." 18 U.S.C. §1344.

written findings of fact, conclusions of law, and judgment of the hearing panel under Rule 9, section 15.3(a). In accordance with section 33 of that Rule, it may be appealed within 60 days in the appropriate Circuit or Chancery Court.

II. Issue Presented

Under Rule 9, section 22.3(c), after conviction of a "serious crime" as defined in section 2, "the sole issue to be determined shall be the extent of the final discipline to be imposed." The Petitioner Disciplinary Counsel bears the burden of proof on this issue, which is to be determined in accordance with the American Bar Association Standards for Imposing Lawyer Sanctions. Facts must be proven by a preponderance of the evidence.

III. Findings of Fact

A. Parties

1. Petitioner is the Disciplinary Counsel of the Tennessee Board of Professional Responsibility, who is charged with prosecution of violations of the Rules of Professional Conduct. Tenn. Sup. Ct. R. 9, §§ 2, 7.3.

2. Respondent Jennifer Elizabeth Meehan is an attorney formerly licensed to practice in Tennessee, South Carolina, and Texas. Ms. Meehan was licensed in Tennessee in 2003 and has a BPR number of 22932. She was licensed in South Carolina in 2008 and in Texas in 2010. Her Tennessee and South Carolina licenses have been suspended since her conviction; she has voluntarily surrendered her Texas license. Exhibits 7 (records of S.C. disciplinary proceeding), 8 (Texas resignation). Ms. Meehan is a resident of Anderson, South Carolina, where she was practicing prior to her suspension.

B. Respondent's Education and Professional Background

3. Ms. Meehan attended the University of Alabama as an undergraduate, where she was a member of the Gamma Phi Beta sorority. This was a formative experience for Ms. Meehan, who built a strong bond with her sorority sisters and a strong desire to reform a sorority system that she saw as elitist and exclusionary. She served as President of her sorority in her junior year, prior to graduation in 1998.

4. Following her graduation from the University of Alabama, Ms. Meehan attended the Texas Tech University School of Law in Lubbock, Texas, from which she graduated in 2003. In that year, she moved to Nashville and took the Tennessee bar exam. Ms. Meehan lived in Nashville for the next six years.

5. Although interested in copyright and entertainment law, Ms. Meehan had difficulty in finding a position in that field. She worked for the Tennessee Department of Commerce and Insurance's Board for Licensing Contractors, as well as for the firm of King & Ballew, where she assisted on a large copyright infringement case. According to Ms. Meehan, she has not represented a client in Tennessee since December 2007.

6. In 2008, Ms. Meehan's father was diagnosed with melanoma and she established a legal practice in Anderson, South Carolina, so that she could assist in the family business and obtain a contractor's license.

7. In 2009, Ms. Meehan applied for a job with the Tennessee Department of Health. At that time, she was hoping that her brother Dr. Jay Meehan would match for a residency at Vanderbilt University Medical Center. In her résumé submitted to the Department of Health (and others), Ms. Meehan falsely represented that she had served as a law clerk to a United States district judge, while in fact she had served as an extern. Exhibits 3 (conditional guilty

plea), 9 (Protocol Memorandum). In addition, the résumé included a published article that, while placed in proofs, was never actually published. In addition, Ms. Meehan made false statements to Disciplinary Counsel for the Board in connection with the disciplinary proceeding. *Id.* This incident led to a prior disciplinary proceeding and a September 23, 2011, Order of Enforcement imposing a public censure for violation of RPC Rules 7.1, 8.1, and 8.4. *Id.* South Carolina imposed a reciprocal public reprimand based on the Tennessee discipline.

8. Ms. Meehan eventually moved back to South Carolina and began practicing in Anderson. She was in a solo practice until her indictment and arrest in June 2015, working with hospital clients on privacy issues and some large estates. Exhibit 7 (S.C. disciplinary proceedings).

C. The Gamma Phi Beta Sorority House Project

9. As noted, Ms. Meehan's membership in the Gamma Phi Beta sorority was an important part of her undergraduate experience at the University of Alabama. Following her graduation, she remained active in the chapter as an alumna. That involvement included membership on the sorority's Housing Board, of which she became President in 2008.

10. Like other fraternities and sororities at the University of Alabama, Gamma Beta Phi contracted with Greek Resource Services, Inc., to provide financial management services. Gamma Beta Phi's Housing Board managed the sorority's house and worked with Greek Resources in doing so.

11. Although Gamma Beta Phi originally leased a house from the University of Alabama, it eventually purchased the original house, using financing from the University. Although the original sorority house was refurbished, it proved too small, which was a hindrance to recruitment. Ms. Meehan and others considered the construction of a new sorority house

important to the chapter's future. The sorority was granted a lot for a new house by the University in 2012.

12. After an architect selection process was completed, Gamma Phi Beta secured a construction loan to build a new 45,000 square foot sorority house. That construction loan was in the \$10-11 million range and the total price for the new house was \$14-15 million. Exhibit 1 (Plea Agreement). The balance after the construction loan proceeds was to come from the sale of the original house back to the University and from other chapter assets.

13. As President of the Housing Board, Ms. Meehan signed the construction loan on behalf of Gamma Phi Beta. None of the proceeds of the construction loan were involved in the 2016 criminal case.

14. Furniture, rugs, kitchen equipment, and art work for the new Gamma Phi Beta sorority house were to be paid from separate chapter funds. Ms. Meehan's role was to coordinate these orders and any upgrades over the standard allowances included in the original plans and price. Among the upgrades selected were a medallion for the entry hall floor, custom flooring, and a floating staircase.

15. Because the schedule for completion of the new sorority house was tight and Greek Resource Services often processed payments for supplier's invoices slowly, Ms. Meehan was concerned about ordering the upgraded items and insuring their installation prior to the start of the rush process for the new (2015) school year.

16. Ms. Meehan often received checks from Greek Resource Services to pay for various items at the house and to reimburse her for personal funds spent on the project and other sorority expenses. Many of these checks to Ms. Meehan from Greek Resource Services were in excess of the amount of actual expenditures. For the period March 2011 through June 2015, that

excess cash amounted to \$234,732.82, which she stored in a boot box in her closet and accounted for in a handwritten ledger (Exhibit 11 (ledger)). These funds were eventually returned in or around March 2016 and were not a part of the bank fraud charge to which she pled guilty. Exhibits 14 (Judgment), 15 (Statement of Reasons). According to Ms. Meehan, she intended to use this \$235,000 in cash to fund a scholarship for Gamma Phi Beta, an idea opposed by Greek Resource Services. This cash was returned to Gamma Phi Beta by Ms. Meehan's counsel some nine months after she was charged in the federal criminal case. *Id.*

17. One supplier of hardwood furniture for the new house was Teknion, a manufacturer whose products were sold in Alabama through AI Corporate Interiors. In an effort to avoid the perceived red tape and delays in processing orders and invoices through Greek Resource Services, as well as to secure a prompt payment discount, Ms. Meehan used software provided by AI Interiors to create two false invoices that appeared to be from Teknion. These two invoices totaled approximately \$375,000, which was paid in two checks issued by Greek Resource Services to Teknion and given to Ms. Meehan in September and November 2014.

18. Ms. Meehan opened an account in the name of "Technion" at a First Citizens bank branch in Carnesville, Georgia, on a return trip from Tuscaloosa (notwithstanding that First Citizens also had a branch in Anderson, South Carolina). To open this account, Ms. Meehan provided a corporate resolution, which purported be that of Teknion but, according to her, was actually prepared by AI Corporate Interiors. In any event, the Teknion paperwork was not what it purported to be: a corporate resolution authorizing opening a First Citizens' bank account in the name of the entity to whom the two Greek Resource Services checks were written.

19. Ms. Meehan testified that she was given the false corporate resolution by AI but did not review the documents. She testified that she was not aware that she was listed in that fraudulent resolution as the CFO for Teknion.

20. Ms. Meehan later transferred \$175,000 from the false "Teknion" First Citizens' account to a Bank of America account in her name to pay AI Corporate Interiors. Ex. 12 (cashiers' check dated 3/8/15). This was accomplished via a cashier's check to AI. *Id.*

21. The balance of approximately \$200,000 in Gamma Phi Beta funds in the false Teknion account were later returned to Greek Resource Services in March 2015.

22. The Gamma Beta Phi sorority house opened by August 1, 2015, its planned date of completion.

D. The Federal Fraud Charges, Conviction, and Sentence

23. Ms. Meehan was arrested on June 29, 2015. The original indictment of June 25, 2015, included eight felony charges: three counts of wire fraud, 18 U.S.C. § 1343 (Counts 1-3); one of bank fraud, 18 U.S.C. §1344 (Count 4); and four of money laundering, 18 U.S.C. §1957 (Counts 5-8). Indictment (Doc. 1), *United States v. Meehan* (N.D. Ala. No. 7:15-cr-00189-MHH-JHE).

24. Ms. Meehan pled guilty to Count 4 (bank fraud) of the indictment, entering into a Plea Agreement on July 12, 2016 (Ex. 1). The factual basis for the plea, to which Ms. Meehan agreed, is as follows:

The Government is prepared to prove, at a minimum, the following facts at the trial of this case:

Defendant JENNIFER ELIZABETH MEEHAN (MEEHAN) is a Graduate of the University of Alabama, a former member of the Gamma Phi Beta Sorority (GPBS), and as of August 1, 2011, was the President of the House Corporation Board of The Epsilon Lambda chapter of GPBS at the University of Alabama.

The GPBS was in the process of building a new sorority house at the University of Alabama which was a \$14,000,000 project. MEEHAN was responsible for coordinating and purchasing any and all furniture and associated implements for the sorority house under construction.

Greek Resource Services (GRS), 2118 8th Street, Tuscaloosa, Alabama 35401, is a contract company who acts as fiduciary, manager, and custodian of the accounts for multiple fraternities and sororities at the University of Alabama, including GPBS.

MEEHAN, in her capacity as the President of the House Corporation Board of The Epsilon Lambda chapter of GPBS at the University of Alabama, did knowingly and willfully execute a scheme and artifice to obtain moneys and funds owned by or under the custody or control of First Citizens Bank & Trust Company, and Bank of Tuscaloosa financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses and representations.

The Defendant submitted a false invoice from "Technion" LLC (number 98979879) for furniture to GRS for payment on September 23, 2014, causing GRS to generate a check from GPBS, drawn on the GPBS account at Bank of Tuscaloosa, Tuscaloosa, Alabama, payable to TECHNION ACCOUNTS RECEIVABLE at P.O. Box 251, Villa Rica, GA 30180 for \$88,311.60. This check was given directly to MEEHAN in Tuscaloosa, AL, on September 23, 2014. The Defendant previously purchased a post office box at P.O. Box 251, Villa Rica, GA 30180, under the business name "Teknion."

On September 26, 2014, MEEHAN opened a business checking account at First Citizens Bank & Trust Company, 9654 Lavonia Road, Carnesville, Georgia, (Acct # XXXXXXXXX9501) under the company name of Technion LLC. MEEHAN is in no way affiliated with the legitimate Teknion LLC, a New Jersey based furniture manufacturing company. MEEHAN also submitted an Employer Identification Number (EIN) for Technion of 58-2011597 and an address of P.O. Box 251, Villa Rica, GA 30180.

On September 26, 2014, shortly after opening the Technion business account, MEEHAN deposited the \$88,311.60 check into the fraudulently opened bank account at a different branch of First Citizens Bank & Trust Company (Account number XXXXXXXXX9501).

On October 1, 2014, a representative of First Citizens Bank & Trust Company, contacted MEEHAN about possible incorrect information on her account when it was opened. The EIN of 58-2011597 that MEEHAN submitted was actually the EIN of "Advantage Office Solutions" an office furniture business in Villa Rica, Georgia. On October 6, 2014, MEEHAN contacted First Citizens Bank & Trust Company and provided information to them that the correct EIN should be 22-3785040 and the correct address should be 401 Fellowship Road, Mount Laurel,

New Jersey. This EIN and address provided by MEEHAN is the EIN and address of the legitimate Teknion LLC of New Jersey. MEEHAN also submitted various fraudulent documents, to include a false and fraudulent "Organizational Resolution of the Members of "Teknion" LLC, a Delaware Limited Liability Company" document to open the account. The "Organizational Resolution" listed the Chief Financial Officer as Jennifer Meehan. After receiving these documents, First Citizens Bank changed the account name to Teknion LLC, Mount Laurel, New Jersey, and changed the defendant's business account EIN to 22-3785040.

MEEHAN further created a false invoice (invoice number 98979987) from "TECHNION LLC," 65 Leggett Drive, Villa Rica, GA 30180, payable to "TECHNION" ACCOUNTS RECEIVABLE, P.O. Box 251, Villa Rica, GA 30180, in the amount of \$286,740.00, for various articles of furniture.

The Defendant submitted the false invoice (number 98979987) to GRS for payment on November 18, 2014, causing GRS to generate a check from GPBS, drawn on the GPBS account at Bank of Tuscaloosa, Tuscaloosa, Alabama, payable to TECHNION ACCOUNTS RECEIVABLE for \$286,740.00, on or about November 21, 2014. On November 21, 2014, this check was given directly to MEEHAN in Tuscaloosa, AL.

On December 12, 2014, MEEHAN deposited the \$286,740.00 check into the fraudulently opened bank account at the Buckhead, Georgia branch of First Citizens Bank & Trust Company (Acct number XXXXXXXXX9501).

It was further part of the scheme and artifice that MEEHAN, on January 8, 2015, entered the Anderson, South Carolina branch of First Citizens Bank & Trust Company and wired \$175,000 from the "Teknion" First Citizens Bank & Trust Company (Acct number XXXXXXXXX9501) to her personal business Bank of America bank account for her personal use. MEEHAN also changed the address for Teknion LLC back to 65 Leggett Drive, Villa Rica, GA 30180.

The Defendant and the Government agree that the loss amount in this case is between \$250,000 and \$550,000.

Exhibit 1 (Plea Agreement).

25. The Plea Agreement also included the following stipulation:

The defendant hereby stipulates that the facts stated above are substantially correct and that the Court can use these facts in calculating the defendant's sentence. The defendant further acknowledges that these facts do not constitute all of the evidence of each and every act that the defendant and/or any co-conspirators may have committed.

Id. (emphasis in original).

26. At Ms. Meehan's sentencing hearing, United States District Court Judge Madeline Hughes Haikala imposed a sentence below the U.S. Sentencing Guidelines range and sentenced Ms. Meehan to six months imprisonment, 40 months of supervised release (including 18 months of home detention), a fine of \$50,000, and restitution of \$34,815.41 to Greek Resources, which had already been paid. Exhibit 14 (Judgment).² This was in addition to forfeiture of \$234,648.00, the "boot box" cash stored in Ms. Meehan's closet, which had already been returned to Greek Resources and Gamma Phi Beta. In her statement of reasons, Judge Haikala found that Ms. Meehan did not personally profit from her offense and noted that she had lost her law license and practice as a result. Exs. 14, 15.

27. Ms. Meehan reported to the federal prison camp at Alderson, West Virginia, in January 2017 and served the custodial portion of her sentence. As part of her pre-release transition program, Ms. Meehan volunteered to serve at Community Kitchens of Birmingham, a charitable organization serving lunches to the homeless and hungry in Birmingham, Alabama. According to witness Kimberly Jeanty, Program Director for Community Kitchens, Ms. Meehan was of substantial assistance to that program and served with skill and integrity. Ms. Jeanty would not hesitate to hire her to work at the program.

E. Disciplinary Proceedings in Other States

28. Upon her indictment, Ms. Meehan reported the charges to licensing authorities in Tennessee, South Carolina, and Texas. Pursuant to Rule 9, section 22.3(a), her Tennessee license was automatically suspended. Likewise, her South Carolina license is under suspension. Exhibit 7 (S.C. disciplinary proceeding records).

² The copy of the Judgment entered into evidence is missing page 2 of 7, which sets out the custodial portion of the sentence. The parties agree that the period of incarceration was six months. In any event, the Judgment is available on the ECF site for the U.S. District Court for the Northern District of Alabama and the hearing panel may take judicial notice of that official court record under Rule 201 of the Tennessee Rules of Evidence.

29. Ms. Meehan negotiated the surrender of her Texas license in lieu of discipline on March 7, 2017. Exhibit 8 (Texas resignation in lieu of discipline).

30. Disciplinary proceedings remain pending in South Carolina. According to Ms. Meehan and her South Carolina counsel Mike Glenn, South Carolina will most likely follow whatever decision Tennessee makes as a matter of reciprocity, as it did with the prior 2011 public censure. Exhibit 6 (Rule 413, SCACR, Rule 29 (South Carolina Reciprocal Discipline Rule)).

F. Procedural History

31. Ms. Meehan's Tennessee law license was summarily suspended by the Tennessee Supreme Court on August 10, 2016. A Petition for Final Discipline was filed by the Petitioner Board of Professional Responsibility on August 10, 2016, to which Respondent filed her answer on December 2, 2016.

32. . The hearing on the Petition was originally set for January 11, 2017. On January 4, 2017, Respondent filed a Motion to Continue Hearing for Final Discipline, seeking an indefinite continuance until disciplinary proceedings were completed in her home state of South Carolina or, in the alternative, until January 25, 2017. She also indicated that she hoped to retain Tennessee counsel to represent her at a postponed hearing. The hearing panel granted that motion and continued the original hearing date to January 25, 2017, the date requested by the Respondent. Counsel were notified of the continuance and of the new hearing date via email on January 6 and via mail on January 9, 2017. The order was mailed to Ms. Meehan on January 9 at the address shown on her Motion to Continue. A separate notice of hearing was mailed to that address on January 10, 2017.

33. On the morning of January 25, 2017, the panel received a further emergency motion for continuance, in which Respondent indicated that she had surrendered to the Bureau of Prisons early to begin serving her six-month sentence and renewing her request for an indefinite continuance. (That emergency motion was apparently filed via fax at 5:04 p.m. the prior afternoon.) At the 1:00 p.m. CDT hearing, the panel heard the Petitioner's response and objection to a further continuance. Following confirmation that the Petitioner did not intend to present any live witnesses but merely to argue for the sanction of disbarment based on the Alabama federal bank fraud conviction, the panel heard Petitioner's argument. After that argument, the panel adjourned the hearing and issued an order allowing Ms. Meehan thirty days after receipt of the transcript of the January 25, 2017, proceedings to submit any evidence or argument on an appropriate sanction arising out of her bank fraud conviction.

34. On February 27, 2017, Tennessee counsel entered a notice of appearance for Respondent, who had previously represented herself. In addition, Respondent filed a Renewed Motion to Continue and a Submission of Evidence in Mitigation, including affidavits from Ms. Meehan and her mother and various documents from the Northern District of Alabama federal criminal case. The Petitioner filed a response to both and Respondent filed further replies on March 8 and 10, 2017.

35. Respondent's Renewed Motion to Continue of February 27 was granted in part. In that motion, Respondent again sought an indefinite continuance of these proceedings until completion of disciplinary proceedings in South Carolina. That portion of the renewed motion was denied on the grounds that Tennessee has an independent interest in the ethics and integrity of its bar and in protection of the public which should not await the conclusion of separate proceedings in another state. In the alternative, Respondent sought a continuance until after her

release from the U.S. Bureau of Prisons on June 16, 2017, so that she could attend a hearing in person and present additional evidence in mitigation of any final discipline. Although the panel had not heard any live witnesses on behalf of the Petitioner and Respondent has previously submitted affidavits and documentary evidence, the panel granted that portion of the motion and allowed a continuance until after June 16, 2017, to allow Ms. Meehan to attend in person should she choose to do so. That hearing was later set for July 31, 2017.

36. An in-person evidentiary hearing was held on July 31, 2017, at which Ms. Meehan attended and was represented by counsel. Together, the parties introduced sixteen exhibits and the testimony of ten live witnesses (one of whom testified by phone, without objection).

37. In its case-in-chief at the July 31 hearing, Petitioner Disciplinary Counsel reiterated the arguments and factual bases upon which it seeks disbarment as the final discipline. The Board relied upon the evidence previously introduced, including Ms. Meehan's conviction and the prior Tennessee public censure from 2011. Exs. 1 (Plea Agreement); 2 (Order of Enforcement (9/23/11)).

38. Respondent's first witness was attorney Mike Glenn, formerly of Anderson, South Carolina. Mr. Glenn practiced in Anderson for 52 years and is counsel for Ms. Meehan in her pending South Carolina disciplinary proceedings. Exhibit 5 (CV of Mike Glenn). He testified that he was retained around July 2, 2015, and wrote letters of voluntary disclosure to Tennessee and Texas bar officials. He noted that Ms. Meehan was currently on indefinite suspension with the South Carolina bar and introduced a copy of South Carolina's rule for reciprocal discipline. Exhibit 6. He opined that it was a "high bar" to avoid reciprocal disbarment under the "grave injustice" exception in that rule. He also noted that Ms. Meehan was cooperative with South

Carolina's receiver, Peyre Lumpkin, who was automatically appointed to wind up her practice upon her summary suspension. Mr. Glenn reported that all client matters were found to be in order and that no client funds were missing. Exhibit 7 (S.C. disciplinary proceeding records). Mr. Glenn also negotiated the surrender of her Texas license in lieu of discipline. Exhibit 8 (letter of resignation in lieu of discipline). He also testified that he has found Ms. Meehan to be honest and forthcoming and that her family has an excellent reputation in the Anderson, S.C., community.

39. Respondent's second witness was Anderson attorney Druanne White, who served as the elected Solicitor (district attorney) for Anderson, S.C., prior to entering private practice in 2005. Ms. White testified that she knew Ms. Meehan and her family both personally and professionally. She asserted that Ms. Meehan had an excellent reputation in the public at large and within the local bar. The prior Tennessee discipline in 2011 and the November 2016 Alabama federal conviction did not change Ms. White's opinion of Ms. Meehan's character. Ms. White would also be happy to serve as a mentor for Ms. Meehan if she were allowed to practice again.³ Ms. White admitted that the appearance to the public of allowing Ms. Meehan to continue to practice was a valid concern but also noted that "I don't want to be judged on my worst day."

40. Respondent's next witness was Carolyn Lazenby, the Executive Director of the Tennessee Board for Licensing Contractors. She knew Ms. Meehan from her work as a Tennessee Department of Commerce and Insurance (TDCI) staff attorney for the Board in 2005 and described her duties in that role. Lazenby was complimentary of Ms. Meehan's work for the Board and felt that the federal bank fraud conviction was "uncharacteristic" of the person she

³ Respondent filed a proposed Mentoring Plan and Agreement with Ms. White as part of her Post-Hearing Brief.

knew. She offered the opinion that Ms. Meehan was honest and had good character--an opinion not changed by the prior Tennessee discipline or the federal bank fraud conviction.

41. Don C. Sharp is a farmer in Allendale, South Carolina, and a friend of Ms. Meehan's father. He has known the Respondent for her entire life. Mr. Sharp serves on the South Carolina Foundation Seed Board and noted that Ms. Meehan had done work on a lease between that Board and Clemson University. He was very satisfied with the work she did for the Seed Board and spoke highly of Ms. Meehan's "wonderful big heart." He would be comfortable with hiring her in a legal matter and her conviction and prior discipline did not affect his opinion of her.

42. Cindy Shiftlett is a nurse by training and currently oversees HIPAA compliance for the Spartanburg Regional Health Center. In that role, she has worked with Ms. Meehan since 2010 on privacy issues such as HIPAA and HITECH compliance for the hospital. Ms. Shiftlett found Ms. Meehan's work to be "top notch" and was working on projects with her when Ms. Meehan was suspended. They had also become personal friends. Ms. Shiftlett felt that Ms. Meehan "always wants to do the right thing" and her conviction did not change that opinion.

43. Kimberly Jeanty is the Program Director for Community Kitchens of Birmingham, a 501(c)(3) organization that operates two facilities serving free lunches to those in need. Ms. Meehan worked as a volunteer at Community Kitchens while she was in transitional housing pending release in May or June of 2017. As a volunteer, Ms. Meehan helped with organizing volunteers, social media, answering phones, and the like. She worked eight hours per day, five days per week at Community Kitchens. Her performance was "excellent" and Ms. Jeanty found her to be "a really solid person." Ms. Jeanty understood from Ms. Meehan's

caseworker that Ms. Meehan was not required to work as part of her transition service but chose to do so.

44. Christy Stout McWhorter of Memphis is a lawyer who currently works in governmental affairs for a financial institution. She met Ms. Meehan in a Tennessee bar exam preparation class in 2003 and worked with her at TDCI thereafter. She and Ms. Meehan became friends in 2003 and she has found her to be dependable, trustworthy, and reliable. Neither the federal bank fraud conviction nor the prior Tennessee public censure has changed her opinion of Ms. Meehan. She found the bank fraud conviction to be "very out of character" for the person she knew.

45. Elizabeth Lee Lyons of Highlands, N.C., has known Ms. Meehan for over thirty years and has children of the same age. She employed Ms. Meehan as her counsel in connection with her father's will in 2006 and found her to be competent "above and beyond" Ms. Lyons' expectations. She would be comfortable hiring her again today, notwithstanding the criminal conviction, which--while shocking and disappointing to her--did not change her opinion of Ms. Meehan.

46. Dr. John Thomas (Jay) Meehan is the Respondent's brother. He is currently a fellow in cardiology at the Medical University of South Carolina and will specialize in interventional cardiology upon completion of his fellowship. He is three years younger than Ms. Meehan. Dr. Meehan was diagnosed with lymphoma during his fellowship and Ms. Meehan helped to care for him. He also described how Ms. Meehan had helped him with reading as a child and her active community service. He has always found her to be an honest and truthful person and noted that being a lawyer has always been important to her. He also testified that Ms. Meehan suffered from benign tumors of the uterus in 2007, a painful and debilitating condition

which required pain medication and surgery in 2009. In general, Dr. Meehan's testimony suggested that this illness and treatment, which made it unlikely that Ms. Meehan could have children of her own, strongly influenced her substantial involvement with Gamma Phi Beta. He also recounted that their father was diagnosed with melanoma in 2008 and Dr. Meehan himself with Hodgkin's' Lymphoma in late 2014. During 2015, Ms. Meehan was working in Anderson, S.C., traveling regularly to care for Dr. Meehan, and traveling regularly to Tuscaloosa to assist with the Gamma Phi Beta sorority house project. He believes that Ms. Meehan has learned that she needs to "stay in bounds" and not try to work around Greek Resource Services, even if they were a barrier. He also testified that she has exhibited remorse and has learned from this difficult experience.

47. Jennifer Meehan testified on her own behalf. She is forty years of age and, as noted, graduated from Texas Tech School of Law in 2003. She took the Tennessee bar in 2003 and lived in Nashville for six years. Around September 2009, she applied for a job with the Tennessee Department of Health (TDOH), which led to the Tennessee disciplinary charges for false statements in the résumé regarding a federal court clerkship and publication of an article in a non-existent law journal. There was an initial default in that proceeding, due to her failure to provide the Board with an updated address when she moved to Greenville, S.C. That default was later set aside and Ms. Meehan entered a conditional guilty plea to the two false statements in the résumé sent to TDOH, as well as a third in connection with the disciplinary proceeding itself. Exhibits 3 (conditional guilty plea), 9 (protocol memorandum). She later moved to Anderson, S.C., where she was in solo practice at the time of her arrest in June 2015.

48. Ms. Meehan explained that she pled guilty to one count of bank fraud and that the remaining seven counts of the indictment were dismissed. Exhibit 1 (plea agreement). She

testified that the two "Teknion" checks covered in Count 4 of the Indictment (the offense of conviction) were used to buy furniture or were returned to Greek Resource Services and Gamma Phi Beta. Exhibits 12 (Bank of America cashier's check for \$175,000), 15 (Statement of Reasons from sentencing). She recounted her involvement with Gamma Phi Beta and its House Board, the relationship with Greek Resource Services, the new sorority house construction project, and her goals for the new house and sorority. She became concerned over the tight construction schedule and the time lag required to secure payment from Greek Resource Services, which she testified took several weeks--time not available if the house was to be open by 2015 rush.

49. Ms. Meehan also explained the \$234,648.00 she held in cash in the boot box in her closet. These funds were accumulated over a period of years from excess reimbursement for various sorority-related expenses and accounted for in a handwritten ledger that she maintained. She hoped to use these funds for a Gamma Phi Beta scholarship but they were returned to Greek Resource Services and Gamma Phi Beta in March 2016 (after her arrest in June 2015). It does not appear from the record that anyone at Greek Resource Services, Gamma Phi Beta, or its Housing Board knew that she was accumulating these excess reimbursement and expense funds in cash and storing them in a box in her closet.

50. Due to her concern over timing of payments for furnishings for the new sorority house, Gamma Phi Beta attempted to arrange its own account but was told by Greek Resource Services that the sorority could not have any separate accounts. According to Ms. Meehan, the creation of the fraudulent "Teknion" First Citizens Bank account was a result of this concern. She testified that AI Corporate Interiors was the exclusive distributor for Teknion products in Alabama and that AI provided her with an invoice/order template. She used that template to

create two false Teknion invoices, which were not related to any actual order placed at the time and were intended to generate funds that she could set aside for prompt payment of future orders, without the burden of red tape and delay in getting them paid by Greek Resource Services in the normal course. The \$375,000 in funds for the two false Teknion checks issued by Greek Resource Services were from Gamma Phi Beta's account, which included profits from food services, proceeds from the sale of the old sorority house, and other sorority income. The two false Teknion invoices generated about \$375,000 in two checks from Greek Resources to "Teknion," which were deposited in the false Technion account at First Citizens, which she opened in Carnesville, Georgia. She testified that she was given the original Teknion EIN and the false corporation resolution by AI Corporate Interiors. She also testified that she did not know that she was listed as the CFO in that false resolution.

51. Ms. Meehan admitted that she moved \$175,000 from the false Teknion account at First Citizens to her Bank of America account, which she then used to purchase a \$175,000 cashier's check made out to AI on March 18, 2015. Exhibit 12 (cashier's check). The balance in the false Teknion account of approximately \$200,000 was returned to Greek Resource Services in approximately March 2015, prior to her arrest on June 29, 2015. As part of her sentence, Ms. Meehan paid \$34,815.41 in restitution to Greek Resource Services to cover the costs of an audit of the Gamma Phi Beta account. Exhibit 13 (check for restitution). Ms. Meehan agreed that she had defrauded the banks but testified that she did not personally profit from her acts.

52. On cross-examination, Ms. Meehan admitted that she used the name "Technion" to open the Carnesville, Georgia, bank account on September 26, 2014, and that she used a post office box address in Villa Rica, Georgia, that she had opened. She was given the software

template for invoices and orders by AI Corporate Interiors and used it to generate the two false Teknion invoices paid by Greek Resource Services, which were deposited into the false Teknion account she had opened. She admitted that she had no authority from the real Teknion to open an account or to use its EIN. She also admitted that she deposited the second \$286,740.00 check from Greek Resource Services to "Teknion" at a different branch than the Carnesville branch where she opened the First Citizens account. The \$175,000 payment to AI was run through her business account at Bank of America. In all, she used at least three different branches of First Citizens to deposit and transfer the two "Teknion" checks she secured from Greek Resource Services with fraudulent invoices. She also admitted that the \$234,437.82 in cash in the boot box at her home resulted from reimbursement and advances. She also admitted that she became concerned that the real Teknion might seize the balance in the fake "Teknion" First Citizens account when the sorority changed its order to a smaller amount, leading to the return of the unused funds to Greek Resource Services.

53. In response to questions from the panel, Ms. Meehan agreed that she used at least three false documents to secure \$375,000 in sorority funds: two false Teknion invoices and a false Teknion corporate resolution. She also agreed that she had used the 2009 false résumé with other prospective employers in addition to TDOH. The statement regarding her publication in the University of Cincinnati law review would have been on her résumé from around 2005 forward. She also agreed that she submitted false statements during the 2009-11 Tennessee disciplinary process. When asked how she could have relied on false documents again after her prior discipline, she offered that she was "blinded" by the need to finish the sorority house. Ms. Meehan also testified that she has not had a drink in over two years, took a substance abuse class offered at FPC Alderson, and sees a counselor on her own.

54. Respondent's final witness was licensed independent social work Judith Alexander of Greenville, S.C.⁴ She has known Ms. Meehan as a client since July 2012, when she was first consulted over some relationship issues. Ms. Alexander testified that the sorority was a big part of Ms. Meehan's life and that she was very devoted to it. Gamma Phi Beta was something she loved and believed in but Ms. Alexander would not describe her devotion as obsessive. She testified that Ms. Meehan began drinking more heavily while dating a young man who was a heavy drinker. She worked with Ms. Meehan, who returned to lighter social drinking after that relationship ended. Ms. Alexander testified that Ms. Meehan did not suffer from a personality disorder or a character flaw, but admitted that she has had judgment issues. She believes that Ms. Meehan is committed to making wise decisions going forward.

55. Following completion of live testimony on July 31, 2017, the parties were given three weeks to submit any post-hearing briefs. Petitioner and Respondent both submitted such briefs on August 21, 2017. Respondent submitted an additional response to the Petitioner's post-hearing brief on August 28, 2017. Thus, the panel treats August 28, 2017, as the date on which the hearing was concluded under Rule 9, section 15.3(a).

IV. Conclusions of Law

A. Standards for Imposing Lawyer Sanctions

1. Under Rule 9, section 15.4(a), three types of attorney sanction are available: disbarment, suspension, or public censure. In selecting among these sanctions, the Panel is to consider the ABA Standards for Imposing Lawyer Sanctions. Those ABA Standards provide as follows:

⁴ Ms. Alexander testified under oath via telephone, without objection from Petitioner.

3.0 Generally

In imposing a sanction after a finding of lawyer misconduct, a court should consider the following factors:

- (a) the duty violated;
- (b) the lawyer's mental state;
- (c) the potential or actual injury caused by the lawyer's misconduct;
and
- (d) the existence of aggravating or mitigating factors.

American Bar Association, Annotated Standards for Imposing Lawyer Sanctions (2015) (hereafter, "ABA Standards").

2. In this case, the duty violated arises out of the Respondent's conviction of a Serious Crime, as defined in Rule 9 section 2. That serious crime was bank fraud in violation of 18 U.S.C. § 1344, which is crime which includes specific intent to defraud as an essential element. *United States v. Goldsmith*, 109 F.3d 714 (11th Cir. 1997); Eleventh Circuit Pattern Jury Instructions (Criminal Cases) 052: Bank Fraud (Dec. 2016) (available at <http://www.ca11.uscourts.gov/pattern-jury-instructions> (visited Sept. 22, 2017)). Ms. Meehan's plea agreement conclusively establishes her guilt of this crime and her intent to defraud. Exhibit 1; Tenn. Sup. Ct. Rule 9 § 22.6. The commission of a crime involving misrepresentation and fraud violates a duty to the public. ABA Standards 5.0, 5.1.

3. The Petitioner's Petition for Final Discipline also alleges a violation of Rule 8, RPC 1.15 and 8.4(a), (b), and (c). RPC Rule 1.15(d) requires a lawyer receiving funds in which a third person has an interest to promptly notify that person and to promptly deliver funds to the person entitled to receive them. Here, the \$375,000 received by Ms. Meehan as a result of the two fraudulent Teknion invoices belonged to Gamma Phi Beta and its financial manager, Greek

Resource Services. Her admitted failure to notify Gamma Phi Beta promptly and her deceit of Greek Resource Services constitute violations of Rule 1.15(d).

4. Likewise, RPC Rule 8.4(b) makes it a violation of the Rules of Professional Conduct for a lawyer to "commit a criminal act that reflects adversely on the lawyer's honesty, trustworthiness, or fitness as a lawyer in other respects." Rule 8.4(c) makes it a violation to "engage in conduct involving dishonesty, fraud, deceit, or misrepresentation." Ms. Meehan's conviction of bank fraud in violation of 18 U.S.C. § 1344, as well as the evidence presented at the hearing, establishes a violation of Rule 8.4(b) and (c).

5. Ms. Meehan's mental state in committing these violations was, as noted above, a specific intent to defraud, conclusively established by her guilty plea and supported by the evidence adduced at the hearing. Tenn. Sup. Ct. Rule 9, §22.6. As discussed in more detail below, Ms. Meehan's *motive* here may well have been to assist her sorority in completing an important construction project on time and to avoid the delays inherent in use of a third-party financial manager. She attempted to achieve this presumably legitimate goal, however, by fraud—that is, by the intentional, repeated, and sophisticated use of false documents to secure funds to which she was not entitled so as to avoid restrictions put in place to protect the assets of the sorority. While Respondent's post-hearing brief contends that her state of mind was knowing rather than willful, her admission to a specific intent to defraud as part of her guilty plea establishes intentional misconduct, as does the evidence adduced at the hearing.

6. The potential or actual injury here include the potential for tangible and intangible loss to the innocent parties to the transaction, including Greek Resource Services and the banks, the sorority itself, and the real Teknion. Ms. Meehan admits that she was concerned that the real Teknion would seize the funds in the false Teknion back account, which would have resulted in

their loss to the sorority, to whom she owed a fiduciary duty. Just as importantly, the potential or actual injury here includes the reputation of the legal profession, which the Rules of Professional Conduct and ABA Standards for Imposing Lawyer Sanctions are designed to protect. Tenn. Sup. Ct. Rule 8, Preamble: A Lawyer's Responsibilities; ABA Standards, Definitions.

7. Under ABA Standards 5.1, "Absent aggravating or mitigating circumstances," disbarment is generally appropriate when "a lawyer engages in serious criminal conduct a necessary element of which includes . . . misrepresentation, fraud" or "other intentional conduct involving dishonesty, fraud, deceit, or misrepresentation that seriously adversely reflects on the lawyer's fitness to practice." ABA Standard 5.1, 5.11(a) & (b). The parties proposed various aggravating and mitigating factors at the January and July 2017 hearings and in their post-hearing filings. These factors and their weight on the selection of final discipline are discussed below.

B. Aggravating Factors

8. Disciplinary counsel has proposed the following aggravating factors: dishonest motive; pattern of misconduct; substantial experience in the practice of law; illegal conduct; and prior discipline. The first, dishonest motive, is a close question. As noted above, the facts established by the guilty plea and the evidence show an intent to defraud. Motive, however, is a different issue. In this case, it appears that Ms. Meehan was motivated by a desire to assist the sorority. However misguided and disastrously ill-conceived her actions may have been, it does not appear that she acted for her own personal gain. She did, however, seek to avoid restrictions put in place to protect the assets of the sorority, deeming herself a better judge and guardian of those funds than the financial manager paid by the sorority to oversee its finances. While this can itself be seen as selfish, this unusual fact situation does not fall within the class of cases to

which this aggravating factor normally applies. *See* American Bar Association, Annotated Standards for Imposing Lawyer Sanctions 423-27 (2015).

9. Disciplinary Counsel has also proposed a pattern of misconduct as an aggravating factor here. This generally involves “repeated instances of similar misconduct.” *Id.* at 427. The evidence does not show repeated instances of similar misconduct here.

10. Substantial experience in the practice of law may be an aggravating factor under the ABA Standards. In this case, Ms. Meehan had been licensed in Tennessee since 2003, more than ten years prior to her use of false documents to procure \$375,000 in sorority funds for deposit to a fraudulent bank account. During that time, she had also been licensed in South Carolina and Texas, had practiced with a state agency and private firm in Tennessee, had started her own solo practice in South Carolina, and had developed expertise in estates and privacy law in the health care sector. This constitutes substantial experience in the practice law.

11. Disciplinary Counsel identifies illegal conduct as a fourth aggravating factor, while Respondent argues that consideration of this factor would be double-counting under Rule 9, section 22.3, which presupposes a criminal conviction. While no Tennessee case has adopted this prohibition on double-counting in disciplinary cases, the panel believes it more appropriate to consider the nature of the offense as relating to the duty violated, state of mind, and actual or potential injury under ABA Standard 3 rather than as an aggravating factor under standard 9.22(k). Thus, this factor will not be weighed as an aggravating factor here.

12. Finally, Disciplinary Counsel identifies Ms. Meehan’s 2011 public censure as prior discipline constituting an aggravating factor under 9.22(a). As noted, the prior discipline involved the use of a false document (résumé) and false statements in the disciplinary proceeding itself. That disciplinary proceeding resulted in a public censure (in both Tennessee and South

Carolina) in 2011. The underlying criminal conduct here occurred in 2014 and 2015. Given the seriousness of the prior discipline, its recent vintage, and the use of falsified documents in both cases, the panel finds the prior discipline to be an aggravating factor.

C. Mitigating Factors

13. [Respondent has identified twelve proposed mitigating factors under Standards 9.32. The first is the absence of a dishonest or selfish motive. The record conclusively establishes dishonest conduct and intentional fraud. As noted, the absence of a motive of personal financial gain does not equate to the absence of a selfish motive. Ms. Meehan believed herself to be a superior judge of the use and management of sorority assets than Greek Resource Services and set out on an elaborate scheme to obtain funds to which she was not entitled so that she might avoid the restrictions put in place by Greek Resource Services. The record does not support this proposed mitigating circumstance.

14. Respondent also posits personal or emotional problems as a mitigating factor under ABA Standard 9.32(c). Here, there is evidence of Ms. Meehan's personal health problems, as well as those of her father and brother. While certainly stressful and difficult, it is not clear how these may have related to the misconduct at issue. As noted, Ms. Meehan's counselor testified that she was not obsessed with the sorority, although she was "passionate" about it. At most, the panel finds these personal or emotional problems to be slightly mitigating.

15. Respondent identifies timely, good-faith efforts to make restitution to be a mitigating factor under Standard 9.32(d). This factor applies to "lawyers who make restitution voluntarily or make an effort on their own initiative to rectify the consequences of their misconduct." *Id.* at 462. Here, Ms. Meehan returned the balance of the two fraudulent Teknion checks in the approximate amount of \$200,000 prior to her arrest or knowledge of any criminal

investigation. According to her testimony, this was out of concern that the real Teknion might seize the funds left in the false Teknion bank account, not out of any effort to rectify the consequences of the earlier fraud. Likewise, the return of \$234,437.82 in cash from the boot box some nine months after her arrest is not good faith, timely restitution, particularly in light of the forfeiture count in the pending indictment and the forfeiture imposed as part of her sentence in that amount. Finally, the \$34,815.41 restitution imposed as part of her sentence is not a voluntary or self-initiated effort at restitution. The record does not support this mitigating factor.

16. Respondent's fourth proposed mitigating factor is full and free disclosure to disciplinary authorities or cooperative attitude toward the proceedings under ABA Standard 9.32(e). This factor is usually applied when "the lawyer's effort is above and beyond that normally required." *Id.* at 466. Ms. Meehan's report to the Supreme Court of her plea and conviction are mandatory and thus afford no basis for mitigation. Rule 9, § 22.1(b). At most, this factor is mildly mitigating here.

17. Ms. Meehan's next proposed mitigator is inexperience in the practice of law under ABA Standard 9.32(e). As noted above, her more than ten years' experience, multiple law licenses, and varied practice preclude lack of experience as a mitigating factor.

18. Under ABA Standard 9.32(g), character or reputation may be a mitigating factor. Here, there was substantial evidence of good character and reputation, both in Tennessee and in South Carolina. While much of that was from friends or others with close personal or professional relationships, that was not always the case. Ms. Meehan's involvement in various community activities and work at Community Kitchens corroborated this testimony. The panel finds this mitigating factor has been established.

19. Imposition of penalties or other sanctions may be a mitigating factor under ABA Standard 9.32(k). Here, Ms. Meehan has served a custodial sentence of six months (a downward departure from her Guidelines range) and is serving a 40-month term of supervised release. She voluntarily surrendered her Texas license in lieu of discipline and is suspended in South Carolina pending completion of disciplinary proceedings there. None of these prior sanctions directly address the harm to the public or the profession from the conduct at issue. While certainly traumatic for Ms. Meehan and her family, they are only mildly mitigating of any penalty for the disciplinary violations at issue in this case, which are designed to protect the reputation and integrity of the Tennessee bar and protect the public.

20. Ms. Meehan also identified remorse as a mitigating factor under ABA Standard 9.32(l). Both from her own testimony and that of Dr. Meehan and others, it is clear that Ms. Meehan is remorseful for the conduct that led to her conviction and to this proceeding. This mitigating factor is established.

21. Ms. Meehan has also identified several general mitigating factors, not listed in ABA Standard 9.32. The panel acknowledges that the listing of potential mitigating factors in Standard 9.32 is illustrative, not exclusive. The first of these is Ms. Meehan's willingness to have a mentor if allowed to keep her law license. The panel does not find this proposed remedy to be a mitigating factor for her past conduct.

22. Another mitigator offered by Ms. Meehan is her volunteer activities and good works. The panel agrees that these are mitigating factors but has taken them into account in connection with the good character or reputation mitigating factor under ABA Standard 9.32(g).

23. Respondent's third non-textual proposed mitigating factor is her competence as an attorney and her client's satisfaction. Again, the panel has taken the client's opinions into

account as part of the good character and reputation fact under Standard 9.32(g). The panel does not find her competence as an attorney to be further mitigating.

24. Finally, Ms. Meehan poses a mitigating factor that no person was harmed by her conduct. The record shows that Gamma Phi Beta, Greek Resource Services, two banks, the South Carolina bar, and the Tennessee bar were harmed in tangible or intangible ways by the felony fraud committed by Ms. Meehan. Her suggestion to the contrary is rejected.

25. Thus, applying the analysis of ABA Standard 3, the presumptive discipline is disbarment. The panel finds two aggravating factors (substantial experience and prior discipline) and five mitigating factors (personal or emotional problems, cooperative attitude, character or reputation, other penalties or sanctions, and remorse). Determining the effect of these aggravating and mitigating factors is not, of course, simply a matter of counting, but rather of weighing each in light of the particular facts and circumstances presented by the case. Considering and weighing each of these factors, the panel does not find the balance of those aggravating and mitigating factors to justify a departure from the presumptive sanction under ABA Standard 5.11.

D. Final Discipline

Based on the foregoing findings of fact and conclusions of law, the ABA Standards for Imposing Lawyer Sanctions, and the record in this proceeding as a whole, the hearing panel finds that the appropriate final discipline for the Serious Crime in this case is disbarment.

V. Judgment and Notice of Appeal Rights

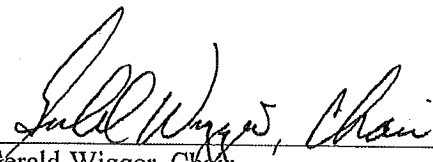
Based on the foregoing findings of fact, and applying the law as set out in the Rules of Professional Conduct and disciplinary rules of the Tennessee Supreme Court, the Hearing Panel finds that disbarment is the appropriate sanction for the violations committed. This constitutes

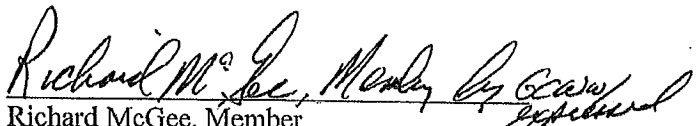
the findings and judgment of the hearing panel under Rule 9, section 15.3(a). Under the applicable disciplinary rule,

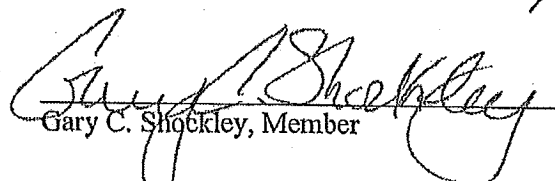
The respondent or petitioning attorney or the Board may appeal the judgment of a hearing panel by filing within sixty days of the date of entry of the hearing panel's judgment a Petition for Review in the circuit or chancery court of the county in which the office of the respondent or petitioning attorney was located at the time the charges were filed with the Board. If the respondent or petitioning attorney was located outside this State, the Petition for Review shall be filed in the circuit court or chancery court of Davidson County, Tennessee. If a timely application for the assessment of costs is made under Section 31.3(a), the time for appeal for all parties shall run from the hearing panel's submission of its findings and judgment with respect to the application for the assessment of costs unless, upon application of the Board to the Court and for good cause shown, the Court orders otherwise. In the absence of such an application and order, a Petition for Review filed prior to the hearing panel's submission of its findings and judgment with respect to the application for the assessment of costs shall be deemed to be premature and shall be treated as filed after the submission of the hearing panel's findings and judgment with respect to the assessment of costs and on the day thereof.

Tenn. Sup. Ct. R. 9, § 33.1(a).

It is so ordered.

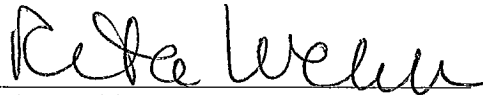

Gerald Wigger, Chair


Richard McGee, Member


Gary C. Shockley, Member

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been sent to Respondent, Jennifer Elizabeth Meehan, at PO Box 280, Sandy Springs, SC 29677-0280; and her counsel, Philip N. Elbert and Benjamin C. Aaron, 1201 Demonbreun Street, Suite 1000, Nashville, TN 37203, via U.S. First Class Mail, and hand-delivered to Disciplinary Counsel, Krisann Hodges and William C. Moody, this the 27th day of September, 2017.

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

Rita Webb
Executive Secretary