BOARD NOTES

FALL 2026

Published by: The Board of Professional Responsibility
of the Supreme Court of Tennessee



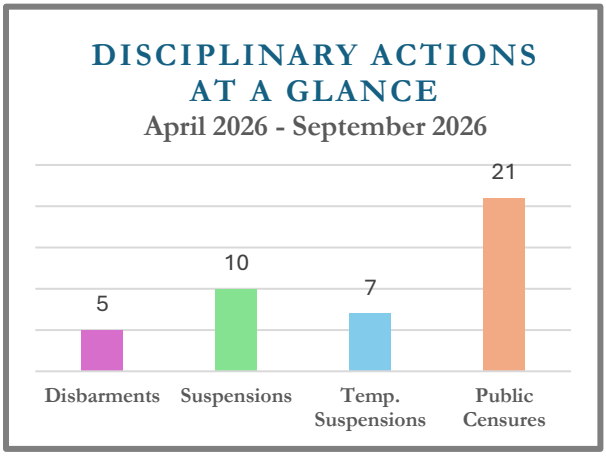
GREETING FROM JUSTICE DWIGHT E. TARWATER

I would like to thank Chief Justice Bivins for asking me to serve as the Tennessee Supreme Court's liaison to the Board of Professional Responsibility. This is indeed a distinct privilege for me, a practitioner for more than forty years. Ours is a profession of honor. All of us, working together, are vital to upholding justice and the integrity of our legal system.

Before me, Chief Justice Bivins, Chief Justice Kirby, and Chief Justice Page all served as our liaison to the Board. Their contributions have been immense, and their legacies on matters of professional responsibility and ethics will stand the test of time.

Our board members, volunteers, and staff are uniquely dedicated, diligent, and capable. Their jobs are not easy. Tennessee lawyers, judges, and the public are well served.

The Board and I hope that this edition of Board notes will provide helpful insights and guidance as we all work together to advance justice and maintain the honor of profession in Tennessee. Thank you for your continued dedication and service.



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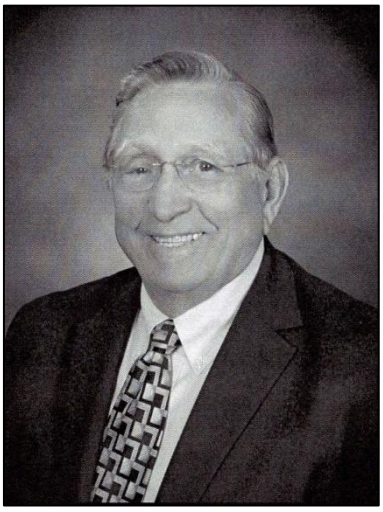
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In Remembrance of Former Chief Disciplinary Counsel Lance Bracy



Former Chief Disciplinary Counsel Lance Bracy passed away on May 20, 2026, at age 90. Mr. Bracy was hired as Disciplinary Counsel for the Board of Professional Responsibility (the Board) in 1976 and was appointed Chief Disciplinary Counsel in 1979. Mr. Bracy served the Board and the Tennessee Supreme Court as Chief Disciplinary Counsel until his retirement in 2007. During his tenure at the Board, Mr. Bracy drafted approximately 140 formal ethics opinions and 600 advisory ethics opinions, while personally responding to more than 12,000 informal ethics inquiries from attorneys. Mr. Bracy taught continuing legal education courses on ethics and was an adjunct Professor at the Vanderbilt University School of Law from 1993 to 1994. He was a Fellow of the Tennessee Bar Association, and a member of the Tennessee Bar Association, the Tennessee Trial Lawyers Association, and the National Organization of Bar Counsel. A memorial service was held in June in Joelton, Tennessee.

Welcome New Board of Professional Responsibility Member

By Order filed September 29, 2026, the Tennessee Supreme Court appointed Andrew Farmer to the Board of Professional Responsibility.



Andrew Ellis Farmer is an attorney, businessman, and member of the Tennessee House of Representatives, where he represents the 17th District, including portions of Jefferson and Sevier Counties. Raised in a family with deep roots in Sevier County, Farmer has built his career around the law, business, and public service in East Tennessee.

Farmer was born in Sevier County on December 14, 1979. He and his wife, Mariah, have two children, and Farmer enjoys spending time with his family. Outside of his professional and legislative responsibilities, he enjoys fishing, hunting, and golf.

Farmer studied business administration and marketing at East Tennessee State University, where he was a member of Sigma Phi Epsilon. He later earned his Juris Doctor from Thomas M. Cooley Law School in Lansing, Michigan. In 2008, Farmer founded The Law Offices of Andrew Farmer, PLLC. The practice serves individuals and families in East Tennessee and handles a range of legal matters, including criminal defense, personal injury, construction law, probate, and estate matters. As a trial attorney, Farmer represents clients facing significant legal challenges and works through complex court proceedings. He is also a co-owner of Hometown Title in Sevierville and Park Avenue Title in Johnson City, bringing business experience alongside his legal work.

Farmer was first elected to the Tennessee House of Representatives in 2012 and continues to represent the 17th District. His legislative leadership has included chairing the House Judiciary Committee and the Congressional Redistricting Committee during an extraordinary legislative session.

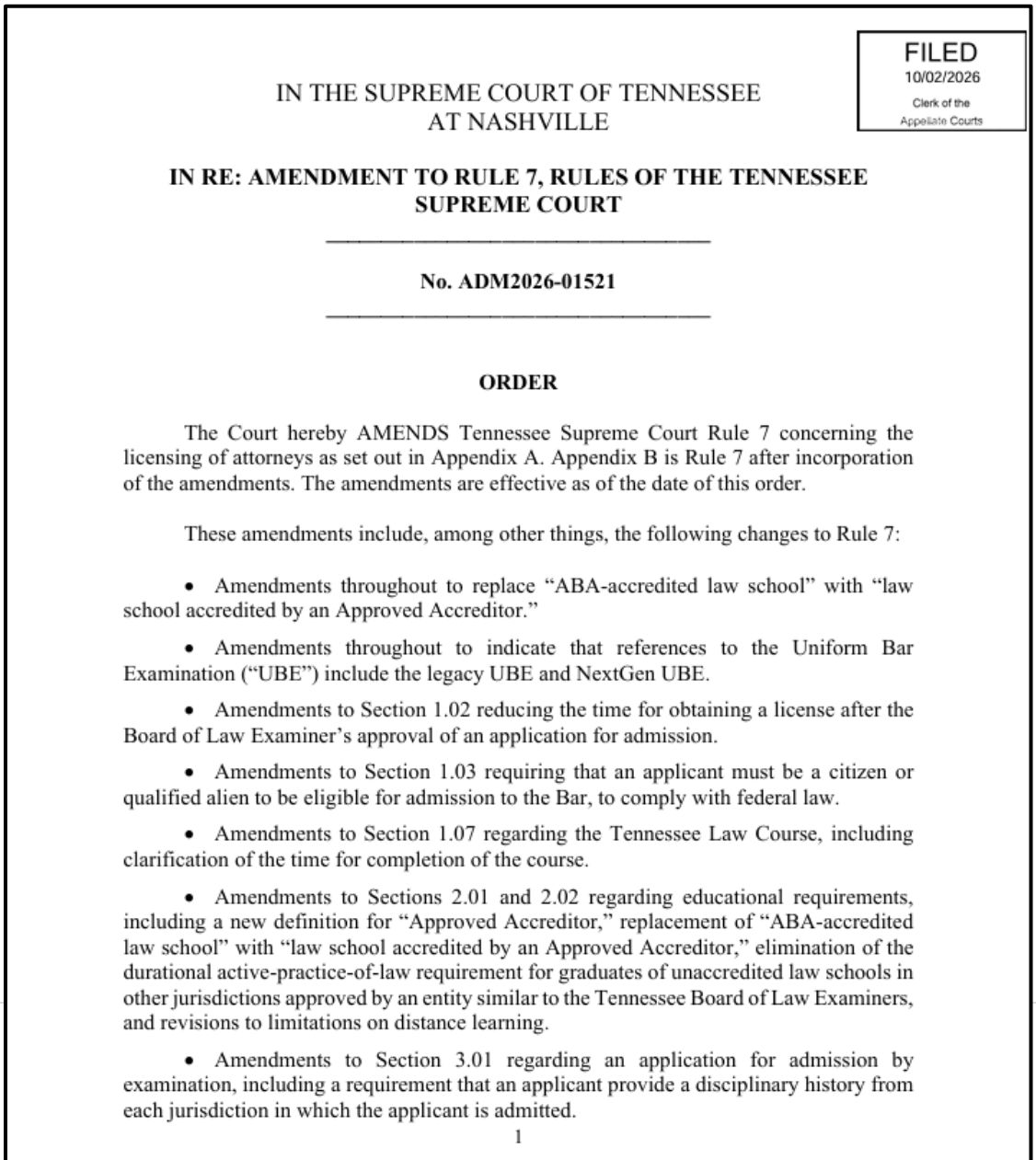
Farmer's professional affiliations have included the Tennessee Bar Association, Knoxville Bar Association, Sevier County Bar Association, and National Association of Criminal Defense Lawyers. His community involvement has included connections with First Baptist Church in Sevierville, Smoky Mountain Area Rescue Ministries, and chambers of commerce serving Jefferson and Sevier Counties. He has also participated in regional legislative work through the Southern Legislative Conference's Human Services and Public Safety Standing Committee.

Across his legal practice, business interests, and legislative service, Farmer's work has remained closely connected to East Tennessee. His professional life brings together courtroom advocacy, business experience, and participation in state government, while his family and community ties continue to anchor him in the region he represents.

Tennessee Supreme Court Amends Tennessee Supreme Court Rule 7 - Licensing of Attorneys

On October 2, 2026, the Tennessee Supreme Court filed an Order amending Tennessee Supreme Court Rule 7 concerning the licensing of attorneys.

[Supreme Court Order No. ADM2026-01521]



FILED
10/02/2026
Clerk of the
Appellate Courts

IN THE SUPREME COURT OF TENNESSEE
AT NASHVILLE

IN RE: AMENDMENT TO RULE 7, RULES OF THE TENNESSEE SUPREME COURT

No. ADM2026-01521

ORDER

The Court hereby AMENDS Tennessee Supreme Court Rule 7 concerning the licensing of attorneys as set out in Appendix A. Appendix B is Rule 7 after incorporation of the amendments. The amendments are effective as of the date of this order.

These amendments include, among other things, the following changes to Rule 7:

- Amendments throughout to replace "ABA-accredited law school" with "law school accredited by an Approved Accreditor."
- Amendments throughout to indicate that references to the Uniform Bar Examination ("UBE") include the legacy UBE and NextGen UBE.
- Amendments to Section 1.02 reducing the time for obtaining a license after the Board of Law Examiner's approval of an application for admission.
- Amendments to Section 1.03 requiring that an applicant must be a citizen or qualified alien to be eligible for admission to the Bar, to comply with federal law.
- Amendments to Section 1.07 regarding the Tennessee Law Course, including clarification of the time for completion of the course.
- Amendments to Sections 2.01 and 2.02 regarding educational requirements, including a new definition for "Approved Accreditor," replacement of "ABA-accredited law school" with "law school accredited by an Approved Accreditor," elimination of the durational active-practice-of-law requirement for graduates of unaccredited law schools in other jurisdictions approved by an entity similar to the Tennessee Board of Law Examiners, and revisions to limitations on distance learning.
- Amendments to Section 3.01 regarding an application for admission by examination, including a requirement that an applicant provide a disciplinary history from each jurisdiction in which the applicant is admitted.

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- Amendments to Section 3.03 regarding the deadlines applicable to an application for admission by examination, including a Final Deadline of March 1 for taking the July examination and October 1 for taking the February examination and new Laptop Registration Deadlines.

- Amendments to Section 3.05 regarding admission by transferred UBE score, including deletion of the provision that previously addressed expired UBE scores in light of amendments to Section 5.01 regarding the durational active-practice-of-law requirement for comity applications.

- Amendments to Section 3.07, previously Section 3.04, to clarify that withdrawal of an application for admission by examination or transferred UBE score must be in writing and that a withdrawn application may not be reinstated.

- Amendments to Section 4.08 regarding withdrawal from examination, including circumstances involving failure to appear, late arrivals, and dismissal for misconduct.

- Amendments to Section 5.01 regarding comity applications, including a reduction of the durational requirement for the active practice of law to three of the five years immediately preceding the date of application, and the requirement that an applicant provide a disciplinary history from each jurisdiction in which the applicant is admitted.

- Amendments to Section 5.03 regarding withdrawal of a comity application.

- Amendments to Section 6.04 regarding the duty of candor, including clarification of the process for referral to the Tennessee Lawyers Assistance Program.

- Amendments to Section 6.06 regarding the certificate of character and fitness to clarify that an applicant must provide both a certificate of admission and a certificate of good standing with disciplinary history from each jurisdiction in which the applicant has been admitted.

- Amendments to Section 10.06 regarding the temporary license of a military servicemember or the spouse of a military servicemember, including amendments to comply with federal law.

- Amendments to Section 10.07 regarding practice pending admission by an applicant licensed in another jurisdiction, including substantive amendments and reorganization to improve clarity. Among other changes, the amendments eliminate the one-year cap on the period of practice pending admission and allow practice pending admission until further order of the Board unless otherwise terminated.

- Amendments to Section 12.01 regarding the composition of the Board of Law Examiners, changing the terms to five years with the ability to serve two successive five-year terms.

- Amendments to Section 12.11 regarding the confidentiality of Board records and files to clarify the scope of protected information and permitted disclosures.

- Amendments to Sections 12.12 and 12.13 regarding the powers of the Board, including the Board's ability to issue subpoenas and orders.

- Amendments to Sections 13.01–09 regarding formal proceedings before the Board and other procedures. These amendments clarify the nature and scope of the Board's powers, and address requirements for documents submitted under oath to the Board.

- Amendments to Section 14.01 regarding petitions for judicial review, including requirements for service on the Board and Attorney General.

The Board of Law Examiners has updated its Policies and Procedures consistent with these amendments, and this Court has approved the changes. *See* Tenn. Sup. Ct. R. 7, § 12.05(a). The updated Policies and Procedures are available on the Board's website at tnble.org/rules-policies. *See* Tenn. Sup. Ct. R. 7, § 12.05(b).

The Clerk shall provide a copy of this order, including Appendix A and Appendix B, to LexisNexis and to Thomson Reuters. In addition, this order, including Appendix A and Appendix B, shall be posted on the Tennessee Supreme Court's website.

PER CURIAM

Ethical Obligations Owed to Former Clients

By: Steven J. Christopher
Deputy Chief Disciplinary Counsel
The Board of Professional Responsibility

Many of Tennessee's ethical requirements apply only to present clients. For example, an attorney's obligation to diligently pursue a client's objectives begins with the commencement of the attorney-client relationship and expires after the representation ends. However, while many of an attorney's obligations do not continue after the conclusion of the attorney-client relationship, Tennessee's ethical rules also define certain ethical duties owed to former clients. This article will summarize the ethical requirements that survive the conclusion of the attorney-client relationship.

Confirming the Conclusion of the Representation

When an attorney concludes their work, the attorney should ensure that the client understands that the representation has ended. In many instances, this will be self-evident, such as where the client discharges an attorney as their counsel of record in a legal proceeding and the attorney obtains leave to withdraw. However, there are circumstances where a client may mistakenly believe that their attorney is continuing to perform legal work on their behalf after the representation has concluded. Consider the scenario where an attorney represents a client in pursuing a civil claim and obtains a favorable judgment through bench trial. The fee agreement signed by the client does not specify if the scope of representation includes collection or enforcement of any judgment. The attorney's understanding is that the

representation concludes following entry of a judgment. They provide the client with a copy of the final order and close their file. The client mistakenly believes that the attorney is taking action to collect the judgment, and on this basis, does not pursue enforcement of the judgment pro se or through successor counsel. The defendant relocates to another state, creating logistical difficulties in collection of the judgment.

Tennessee's ethical rules do not expressly require the provision of notice to a client when the attorney-client relationship ends. However, providing notice to the client when the representation concludes will help prevent confusion and harm to the client. A well-drafted form closing letter will confirm that the attorney has concluded their work. A closing letter also provides occasion for the provision of other pertinent information. If the attorney is representing a client in a pending legal proceeding, the closing letter will provide an opportunity to notify the client of any applicable procedural deadlines. An attorney may also use their closing letter to notify the client of their rights concerning their client file and the attorney's file destruction policies.

In addition to a closing letter, a preemptive step that will help prevent misunderstanding about the conclusion of the attorney-client relationship is a well drafted written fee agreement signed by the client a the commencement of the representation that specifies when the attorney-client relationship will conclude and demarcates between the work that falls within and outside the scope of representation.[1] The inclusion of such language does not obviate the need for a closing letter, as the client may not recall the language in the fee agreement when the representation concludes or understand it's significance.

Ongoing Attorney-Client Relationships

There are circumstances where an attorney provides ongoing services for a client rather than limiting the representation to a single legal matter. For example, an attorney that represents a business entity in the periodic drafting and negotiation of contractual agreements. There may be

[1] Inclusion of such information in a written fee agreement will help ensure compliance with the obligation to define the scope of representation of the client at or soon after the commencement of the representation. TENN. SUP. CT. R. 8, 1.5(b). The Tennessee Rules of Professional Conduct, codified at Rule 8 of the Tennessee Supreme Court Rules, will be cited as RPC _._.

periods of time in such an ongoing relationship where there are no services being provided. In this context, it is crucial for the attorney to be cognizant about whether the client remains a present client, or if the representation concludes following the completion of each legal matter. Without such cognizance, the attorney would not be able to effectively fulfill their ethical obligations. For example, without an understanding about whether an individual or entity is a present or former client, the attorney cannot engage in an accurate conflict analysis.

To help ensure clarity about the nature of the attorney-client relationship, the attorney should clarify in a fee agreement or letter of engagement whether the representation will be considered to be ongoing, or whether the representation will conclude with the completion of each matter, and then resume when additional legal work is needed. In the latter circumstance, a closing letter should also be transmitted.

Protecting a Client's Interests Following Withdrawal or Discharge

Following the conclusion of the representation of a client, an attorney is required to take whatever steps are reasonably necessary to protect the client's interests.[2] RPC 1.16(d) identifies six ethical obligations that may or may not be applicable when the attorney-client relationship concludes: (1) giving reasonable notice to the client of the attorney's intention to withdraw; (2) allowing time for the employment of other counsel; (3) cooperation with successor counsel; (4) promptly surrendering papers and property to which the client is entitled and any work product prepared by the lawyer for the client and for which the lawyer has been compensated; (5) promptly surrendering work product to the extent permitted by other law but only if the retention of the work product will not have a materially adverse effect on the client regarding the representation; and (6) promptly refunding any advance payment of fees that have not been earned or expenses that have not been incurred.

The duties itemized at RPC 1.16(d) are not exhaustive. The steps required to comply with RPC 1.16(d) will depend upon the unique circumstances of the representation. However, an attorney is not required to take all action requested by the client. Like other ethical obligations, the steps that an attorney is required to take to

[2] RPC 1.16(d).

protect their client's interests following withdrawal or discharge is defined by an objective reasonableness standard rather than by the client's own subjective position.[3]

The attorney's obligation to protect the client's interests after the conclusion of the representation applies even where the attorney-client relationship has ended on negative terms. such as where the client has threatened to file or has filed a malpractice lawsuit or a board complaint.[4] Similarly, protecting the client's interests following withdrawal or discharge does not obviate the attorney's right to pursue claims against the client, such as filing suit to collect fee arrears or asserting an attorney fee lien, or to take reasonable steps to protect themselves against the client's pending or prospective claims.

Duties In Seeking Withdrawal Before a Tribunal

When an attorney is discharged or chooses to withdraw in a pending legal proceeding, the attorney is required to comply with any applicable rules of the tribunal in seeking leave to withdraw.[5] These requirements will typically include the filing of a motion, the provision of notice to a client, and appearance before the tribunal for adjudication of the motion. There may be circumstances where an attorney may need to request leave to withdraw on an expedited basis, but to the greatest extent possible, the attorney should provide as much notice as feasible under the circumstances of their intention to withdraw.

Commensurate with their general duty to protect a client's interests following discharge, an attorney should disclose as little information as possible regarding the reason(s) for seeking leave to withdraw in their written motion and in open court.[6] This is particularly the case when the attorney's reasons for seeking leave to withdraw would create potential harm to the client if disclosed. Unless applicable rules of court require a more specific statement, it is suggested that the attorney's written motion track the language from the applicable ground(s) for mandatory or permissive

[3] "Reasonable" or "reasonably", when used in relation to conduct by a lawyer, denotes the conduct of a reasonably prudent lawyer." RPC 1.0(h).

[4] See RPC 1.16, Comment [9]: ("even if the lawyer has been unfairly discharged by the client, a lawyer must take all reasonable steps to mitigate the consequences to the client").

[5] RPC 1.16(c).

[6] Whenever confidential information covered by RPC 1.6(a) is disclosed, disclosure should only be made to the extent reasonably necessary to effectual the purpose of the disclosure.

withdrawal codified at RPC 1.16(a)-(b) without providing greater specificity. For example, if the attorney is withdrawing due to nonpayment of fees, the attorney may recite in the motion that the "client has failed substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled."[7]

If the tribunal requests greater specificity in open court or otherwise, the attorney may provide additional information relating to the representation protected by RPC 1.6, again only disclosing as little information as possible to both comply with the tribunal's directive while seeking to protect the client's interests. Ultimately, however, if the tribunal gives a verbal or written order to the attorney to make more specific disclosure regarding their request to withdraw, the attorney will be required to comply, after raising any available defenses based upon attorney-client privilege or other grounds.[8]

If an attorney seeks leave to withdraw from the representation of a client, the client remains a present client for purposes of an attorney's ethical obligations until such time that the tribunal grants the request to withdraw. Until entry of an order granting withdrawal, the attorney remains obliged to take whatever action is reasonably necessary to further the client's legal objectives, as required by RPC 1.3, to respond to a client's reasonable requests for information pursuant to RPC 1.4, and to otherwise fulfill all of their ethical duties applicable to present clients. The tribunal has discretion to require the attorney to remain counsel of record, and if ordered to do so, the lawyer shall continue the representation even where they have demonstrated good cause to terminate the representation.[9]

The attorney's obligation to continue to pursue their client's interests pending withdrawal applies even when they have been discharged by their client and the client directs them not to take any further action. Even if the attorney is discharged by the client, they remain counsel of record with an affirmative obligation to expedite litigation and to comply with applicable scheduling orders and rules of court.[10] The attorney's

[7] RPC 1.16(b)(5).

[8] RPC 1.6(c)(2) requires disclosure of information relating to the representation of the client to the extent reasonably necessary to comply with an order of a tribunal.

[9] RPC 1.16(c).

[10] See RPC 3.2 (requiring an attorney to expedite litigation); RPC 3.4(c)(prohibiting knowing

ability to take continued action for the client in this circumstance is implicit in RPC 1.2(a), which provides that an attorney is required to comply with a client's directives concerning the objectives of the representation, but is only required to consult with the client concerning the means to achieve those objectives.[11] When there is action that an attorney deems reasonably necessary after discharge by a client, the attorney should advise the client of the proposed course of action, and may proceed even over the client's disapproval as long as the action falls within the means to achieve the client's objectives, rather than the objectives themselves.

A client may mistakenly believe that the filing of the attorney's motion to withdraw, rather than entry of an order of withdrawal, concludes the attorney-client relationship, particularly where the client has discharged the attorney. On this basis, it is recommended that an attorney notify the client that the attorney remains counsel of record pending leave of the tribunal.

Continuing Confidentiality Duties

An attorney is required to maintain confidentiality regarding any information obtained in connection with the representation of the client.[12] An attorney's confidentiality duties survive the end of the attorney-client relationship, although they are marginally modified, as discussed infra.[13]

A lawyer's confidentiality duties to former clients is governed by RPC 1.9(c). A lawyer who has formerly represented a client, or whose present or former firm has formerly represented a client in a matter, is prohibited from using or revealing information obtained relating to the representation to the disadvantage of the former client unless the former client gives informed consent to the disclosure,[14] the disclosure would be permitted or required for a present client

disobedience with an obligation under the rules of a tribunal).

[11] RPC 1.2(a).

[12] RPC 1.6(a).

[13] RPC 1.6, Comment [20]("The duty of confidentiality continues after the client-lawyer relationship has terminated."); RPC 1.9, Comment [1]("After termination of a client-lawyer relationship, a lawyer has certain continuing duties with respect to confidentiality").

[14] Attorneys seeking to obtain confidentiality waiver should be conscious of the high standard for establishing the client's informed consent. RPC 1.0(e) defines informed consent as an agreement by a person to a proposed course of conduct after the lawyer has communicated adequate information and

pursuant to RPC 1.6(b)-(c),[15] or where the information has become generally known.[16]

A present client may waive confidentiality through informed consent, and RPC 1.9(c) incorporates all the permissive and mandatory grounds for disclosure for present clients codified at RPC 1.6(b)-(c). Consequently, the distinction between an attorney's confidentiality obligations for present and former clients is that attorneys may disclose information relating to former clients, but not present clients, when the information has become "generally known." RPC 1.9, Comment [8a] provides guidance about when information falls within the "generally known" exception. Information falls within the generally known exception if contained in records in public libraries, public-record depositories, or publicly accessible electronic databases if the information may be obtained through publicly available indexes or similar means.[17] In contrast, information is not generally known if the information could only be obtained through "special knowledge, substantial difficulty, or expense."[18]

Conflicts Checking for Former Clients

After conclusion of the attorney-client relationship, a lawyer has continuing obligations to prevent conflicts of interest arising out of their representation of the former client.[19] Attorneys with managerial obligations in their law office should ensure that their conflicts checking protocols are inclusive of former clients.[20]

Tennessee's conflict rules regarding former clients prohibit an attorney that has represented a client in a matter from representing another person in the same or substantially related matter in which that person's interests are materially adverse to

explanation about the material risks of and reasonably available alternatives to the proposed course of action.

[15] The circumstances where disclosure of information is permitted are defined at RPC 1.6(b)(1)-(6), and the circumstances where disclosure is required are defined at RPC 1.6(c)(1)-(3).

[16] RPC 1.9(c); RPC 1.9, Comment [8a](providing guidance about when information becomes "generally known" for purposes of RPC 1.9(c) analysis).

[17] RPC 1.9, Comment [8a].

[18] Id.

[19] RPC 1.9, Comment [1]("After termination of a client-lawyer relationship, a lawyer has certain continuing duties with respect to…conflicts of interest.")

[20] The creation and promulgation of appropriate conflicts checking protocols falls within a managerial attorney's obligation to create and promulgate protocols to ensure their office's compliance with Tennessee's ethical rules. RPC 5.1(a). See also RPC 5.1, Comment [2](identifying the implementation of conflicts checking procedures as among the protocols required by RPC 5.1).

the former client, unless the former client gives informed consent, confirmed in writing.[21]

The "same" matter for purposes of RPC 1.9(a) would include the circumstance where a lawyer represents a client on one side of contested litigation and switches to represent an adverse party, or where a lawyer switches sides in a transactional matter.[22] However, a lawyer who handles a type of matter on a recurring basis for a client is not precluded by RPC 1.9(a) from representing another client adverse to the former client in a factually distinct case of the same type.[23] Consider the circumstance of an attorney that represents a landlord in pursuing eviction matters on an ongoing basis ceasing further representation of the landlord, and then subsequently representing a tenant in defense of an eviction action against the landlord. The matters would not be considered the same for purposes of RPC 1.9(a). Despite this, the matters could potentially be deemed to be "substantially related" for purposes of RPC 1.9(a) analysis, and the attorney may additionally be precluded from litigating against the former client if the adverse action would involve use of information obtained through the representation of the landlord to the landlord's detriment, as prohibited by RPC 1.9(c).

The Comments to RPC 1.9 suggest a broad meaning of what matters are "substantially related" for purposes of RPC 1.9(a) conflict analysis.[24] Matters are deemed to be substantially related if they involve the same transaction or legal dispute, when they involve the same work the lawyer completed for the former client, and even more expansively, "where there is a substantial risk that confidential factual information that would normally have been obtained in the prior representation would materially advance the client's position in the subsequent matter."[25] As an example of a circumstance that falls within the last of these three criteria, consider an attorney that represented a client where the client provided significant financial information, and then representing the former client's spouse in a divorce action where the financial

[21] RPC 1.9(a).

[22] RPC 1.9, Comment [1a].

[23] RPC 1.9, Comment [2].

[24] RPC 1.9, Comment [3a]-[3b].

[25] RPC 1.9, Comment [3]-[3b].

information would be used to advance the spouse's interests.[26]

Even where the matters involving the representation of the former and present client are not the same or substantially related, as discussed supra, an attorney's confidentiality duties to former clients preclude using or revealing information obtained from a former client to the former client's detriment, unless the former client provides informed consent, disclosure would be permitted by RPC 1.6(b) or required by RPC 1.6(c), or where the information has become generally known.[27] On this basis, even where the matters involving the representation of the present and former client are not deemed to fall within the substantially related standard, the attorney would be precluded from proceeding if doing so would require using or revealing information relating to the representation of the former client that does not fall within the exceptions codified at RPC 1.9(c).

Maintaining Client Files

Following the conclusion of the representation of a client, an attorney has a continuing obligation to maintain and protect client file materials. This obligation is evident in RPC 1.9(c), which defines an attorney's confidentiality duties to former clients to include any information obtained in connection with the representation of the client, as well as RPC 1.15, Comment [1], which imposes a fiduciary obligation on attorneys for all client and third-party property in their possession.

Tennessee Formal Ethics Opinion 2015-F-160 provides guidance for Tennessee attorneys regarding the duty to protect and maintain client file materials. Tennessee Formal Ethics Opinion 2015-F-160 defines the parameters of what constitutes the "client file" that must be maintained and protected after the conclusion of the representation. The opinion endorses the "entire file" approach adopted by a majority of state jurisdictions.[28] The entire file approach holds that the client file consists of all materials generated by the attorney or obtained by the attorney relating to the representation of the

[26] This particular example of the meaning of when matters are "substantially related" is drawn from RPC 1.9, Comment [3b].

[27] RPC 1.9(c).

[28] See, e.g., Iowa Sup. Ct. Attorney Disciplinary Bd. v. Gotschalk, 729 N.W.2d 812 (2007); Alaska Bar Ass'n Ethics Comm. Op. 2003-3 (2003); Ariz Formal Op. 04-01 (2004); Colo Bar Ass'n. Formal Op. 104 (1999); D.C. Bar Op. 333 (2005); Or. Bar Ass'n Formal Op. 2005-125 (2005); Va. State Bar Op. 1399 (1990).

client. The materials would thereby include, for example, intraoffice memos, case notes, and intraoffice communications.

In adopting the entire file approach, Tennessee rejected the minority rule, referred to as the "end-product" rule.[29] This approach requires surrender of client file materials that are the "end-product" of the attorney's services, but not file materials that led to the creation of the "end product," such as preliminary drafts of documents.[30]

Formal Ethics Opinion 2025-F-160 also confirmed that the client file is the property of the client.[31] Given this conclusion, a lawyer's fiduciary obligation defined at RPC 1.15, Comment [1] extends to all of the information and documentation that constitutes the client file under the "entire file" approach.[32] Additionally, as the client file is the client's property, it must be transmitted to the client within a reasonable time upon request.

While an attorney has a general responsibility to transmit the client file to the client upon request, the Tennessee Rules of Professional Conduct codify a very limited circumstance where an attorney may claim a lien against certain file materials for payment of fee arrears.[33] RPC 1.16(d)(5) provides that an attorney may retain work product to the extent permitted by other law but only if the retention of the work product will not have a materially adverse affect on the client with respect to the representation. This limited exception would require a direct correlation between the unpaid fees charged to the client and the work performed.

The Tennessee Rules of Professional Conduct do not specify the amount of time that the client file materials must be maintained after the conclusion of the representation. Tennessee Formal Ethics Opinion 2015-F-160 recommends that a client file be maintained for five years after closure of the file.[34] However, the opinion

[29] See, e.g., Ala. Ethics Comm. Advisory Op. 1986-02 (1986); Ill. State Bar Ass'n Advisory Op. 94-13 (1955); Kan. Bar Ass'n Op. 92-5 (1992); Miss Bar Formal Op. 144 (1988); Utah State Bar Ass'n Advisory Op. 06-02 (2006).

[30] ABA Formal Op. 15-471 (July 1, 2015).

[31] Tenn. Formal Ethics Op. 2015-F-160.

[32] A lawyer is required to hold the property of others with the care of a professional fiduciary RPC 1.15, Comment [1].

[33] RPC 1.16(d)(5). See also, RPC 1.16, Comment [9].

[34] While no legal authority other than Tennessee's 2015 formal ethics opinion defines a specific period of time for retaining client materials, Tennessee Supreme Court Rule 9, § 35(a)(2) confirms that any trust account records relating to the representation of the client must be maintained for a period of at least five years.

additionally confirms that depending upon the nature of the representation, certain file materials should be maintained for a longer period.[35] For example, files pertaining to minors should not be destroyed prior to the minor reaching the age of majority and after the expiration of the statute of limitations on any potential claims.[36]

It is recommended that an attorney notify the client when the representation concludes that they have a right to receive their client file upon request. An attorney should make their best efforts to respond to requests for expedient transmittal of file materials, particularly when there is a legitimate reason for prompt transmittal, such as an upcoming filing deadline in a legal proceeding.

The file should be transmitted to the client in a manner that best facilitates the duty to prevent disclosure of confidential information, and in accordance with the attorney's fiduciary duties. For file materials that are maintained conventionally, it is best practice to suggest that the client pick up the file materials at the attorney's office, with the client signing an acknowledgment of receipt. If the client requests that any conventionally transmitted materials be mailed, the attorney should confirm the delivery address and strongly suggest that transmittal be accomplished by certified or similar means that will mitigate the possibility that the client file will not be successfully delivered.

If all or part of the client file is maintained digitally, the attorney may transmit any digitally maintained client materials to the client in digital form only. If file materials are transmitted to the client digitally, the attorney should ensure that the client has requisite technology to receive and access the materials in the form that they are transmitted.

If a lawyer wishes to retain a copy of the client file following transmittal of the original to the client, the lawyer may do so conventionally or digitally, but this is not required. If a copy of the file is created, the lawyer is prohibited from charging the client for any costs associated with creating the copy.[37] Copies of client files are subject to the same confidentiality obligations as original materials.

It is recommended that attorneys create and implement a file destruction

[35] Tenn. Formal Ethics Op. 2015-F-160.

[36] Id.

[37] RPC 1.16(d) and RPC 1.16, Comment [9].

policy.[38] Such a policy should confirm the period that a file will be maintained prior to destruction and a mechanism for destroying files after the expiration of this period. Any file destruction policy should ensure that file materials are destroyed in a manner that will not compromise the confidentiality of the file materials.[39] The policy should be promulgated to staff and appropriate training provided to prevent the premature destruction or inadvertent disclosure of file materials. Prior to destruction, the attorney should ensure that non-replaceable documents are maintained, such as original copies of wills.[40]

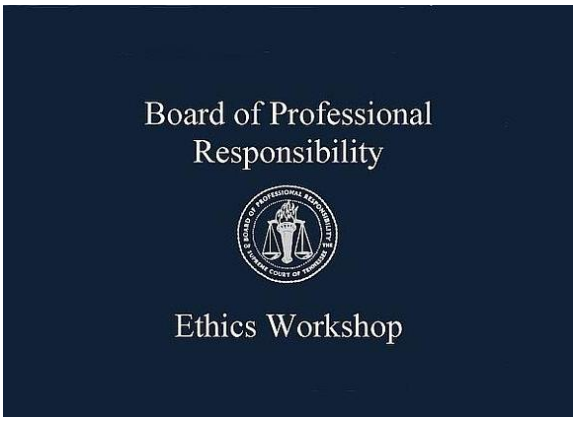
Further Inquiry

If you have questions about the content of this article, you may contact the author at schristopher@tbpr.org or (615) 361-7500, extension 203. Questions about the article may also be directed to the Board's Ethics Counsel, Laura Chastain, at lchastain@tbpr.org, or (615) 361-7500, extension 212.

[38] The creation of a file destruction policy is required by RPC 5.1, which requires the creation and promulgation of firm policies to ensure compliance with Tennessee's ethical rules.

[39] Tenn. Formal Ethics Op. 2015-F-160.

[40] Id.



Friday, November 13, 2026
8AM – 4:00PM (Central Time)
Nashville School of Law
4013 Armory Oaks Drive, Nashville, TN 37204
Purchase Tickets here

The Board's annual Ethics Workshop is scheduled for November 13, 2026, from 8 am until 4 pm central standard time.

In-person and remote registration is available for a cost of $100 providing 6 dual CLE credits.

Visit the Ethics Workshop event page **here** for speaker biographies and more information.

Workshop Agenda

	Presentation Title	Speaker
8:00	Registration	
8:25 – 9:25 1.0 (dual)	***Shut Up! A Refresher Course on Attorney-Client Privilege & Confidentiality*** The attorney-client privilege shields certain communications between a lawyer and client relating to legal representation. But a lawyer's duty to maintain confidentiality is far broader than merely preserving the privilege. Learn about the difference between those two critical obligations and discover the myriads of exceptions that apply to both. Become familiar with the steps needed to be taken to avoid ethics and other problems if client information is wrongly disseminated. In addition, a summary of significant recent trends in lawyer regulation will also be featured.	Jim Grogan

9:30 – 10:30 1.0 (dual)	***Thriving in a Demanding Career*** Presenter will explore features of the legal profession including stress, personality traits, stigma, and lawyers' susceptibility to mental health, behavioral, and substance use concerns. Presenter will outline practices that can help lawyers avoid potential impairments and develop greater success, fulfillment, and happiness in their careers and personal lives.	John Lesko
10:35 – 11:35 1.0 (dual)	***Navigating the Technology Maze: How lawyers can use, misuse, and abuse the latest legal technology*** Recent advances in technology (especially advancements in Artificial Intelligence) have continued to impact on the practice of law. This session will discuss the latest tech developments and how those developments can be used to your advantage, misused to your disadvantage, and abused to destroy tech's advantage.	Bill Ramsey
12:35 – 1:35 1.0 (dual)	***But They're Just Children: Ethical Issues in Representing Children*** In this session, attendees will learn the original purpose of juvenile courts and ethical implications for attorneys. We will discuss child development, adverse childhood experiences and how trauma affects development. The session will focus on the ethics of representing youth in several areas, such as competency and brain development, the balance between rehabilitation and punishment, the use of diversion, systemic racial bias, and the lifelong harm caused by transferring youth to the adult criminal system.	Judge Sheila Calloway
1:40 – 2:40 1.0 (dual)	***The New Frontier: Navigating AI and Deep Fakes in the Legal Landscape*** In an era where artificial intelligence and deep fakes are increasingly sophisticated, the legal community faces new challenges and opportunities. This session will equip attendees with the knowledge to understand and identify AI-generated content and deep fakes, exploring their implications in legal contexts.	Guest Speaker
2:45 – 3:45 1.0 (dual)	***Ethical Issues in Criminal Law*** A panel of District Attorneys General and defense counsel discuss the ethical issues faced in criminal law today.	District Attorney General Dave Clark District Attorney General Stacey Edmonson Richard McGee Ben Raybin

Board of Professional Responsibility

Trust Account Workshop

Wednesday, December 3, 2026
9AM - 12:30PM (Central Time)
Nashville School of Law
4013 Armory Oaks Drive, Nashville, TN 37204
Purchase Tickets here

In person participation is limited to 50 participants. Remote participation by livestream is also available. The cost of attendance is $50.

Steven Christopher, Deputy Chief Disciplinary Counsel of Investigations, and Douglas Bergeron, Disciplinary Counsel in Investigations, will be presenting this CLE. The Board has received approval from the Tennessee Commission on Continuing Legal Education for attendees to receive 3 hours of dual CLE credit for completion of the workshop.

This CLE Program will cover the following topics:

- A summary of best practices for trust account management
- An analysis of the ethical rules governing trust accounts
- How to Prevent Trust Account Scams

Speaker Biographies

Steven J. Christopher is Deputy Chief Disciplinary Counsel of Investigations for the Board of Professional Responsibility of the Supreme Court of Tennessee. Steve earned his J.D. degree from Harvard Law School in 2002, and also holds a Master of Divinity degree from Vanderbilt University Divinity School. Prior to being hired at the Board in 2016, Steve was a Managing Attorney at the Legal Aid Society of Middle Tennessee and the Cumberlands, a private non-profit law firm that provides free legal representation to indigent persons in civil and administrative legal matters. Steve handled a wide range of legal matters as a legal services attorney, including landlord tenant, domestic relations, and public benefits cases.

Douglas R. Bergeron is Disciplinary Counsel in the Investigations Section for the Board of Professional Responsibility of the Supreme Court of Tennessee. Prior to joining the Board, Doug was of counsel at Spicer Rudstrom PLLC, working primarily in Insurance defense litigation and Risk Management. Mr. Bergeron received his J.D. from the University of Memphis School of Law, in 1996, and a B.S.B.A., majoring in Finance, from the University of Central Florida.

Disciplinary and Licensure Actions
(April 2026 – September 2026)

PERMANENT DISBARMENTS

MARCUS ALLEN LIPHAM, BPR NO. 036403
MADISON COUNTY

Effective April 1, 2026, the Supreme Court of Tennessee permanently disbarred Marcus Allen Lipham from the practice of law and ordered him to pay restitution to seven (7) former clients in the total amount of $26,500.00.

After a final hearing upon the disciplinary petition containing nine (9) separate complaints, a Hearing Panel determined Mr. Lipham knowingly engaged in ethical misconduct that involved failure to provide competent representation, failure to act within the scope and authority communicated by clients, failure to act with reasonable diligence, failure to communicate with clients, charging of unreasonable fees, failure to properly terminate representation, failure to expedite litigation, making of false statements to courts and parties, failure to provide legal services after accepting fees, failure to respond to multiple Board inquiries for information, and multiple instances of misconduct involving prejudice to the administration of justice.

The Hearing Panel found by preponderance of evidence that Mr. Lipham knowingly committed the following violations of Tennessee Rules of Professional Conduct 1.1 (competence), 1.2 (scope of representation), 1.3 (diligence), 1.4 (communication), 1.5 (fees), 1.6 (confidentiality), 1.9 (duties to former clients), 1.15 (safekeeping property and funds), 1.16 (terminating representation), 3.2 (expediting litigation), 3.3 (candor toward Tribunal), 3.4 (fairness to opposing party and counsel), 8.1 (bar admission and disciplinary matters), and 8.4(a),(c), and (d) (misconduct).

ELLIOT JAMES SCHUCHARDT, BPR NO. 027016
KNOX COUNTY

Effective April 14, 2026, the Supreme Court of Tennessee permanently disbarred Elliott James Schuchardt from the practice of law. The Supreme Court affirmed the decision of the Knox County Chancery Court and the disciplinary Hearing Panel finding Mr. Schuchardt violated the Rules of Professional Responsibility in four (4) cases and that disbarment was the appropriate sanction.

The Court affirmed the finding that Mr. Schuchardt's conduct in the four cases violated Tennessee Rules of Professional Conduct 1.1 (Competence); 1.3 (Diligence), 1.4(a)-(b) (Communication); 1.5(b) (Fees), 1.7(a)(1) (Conflict of Interest); 1.16(d) (Declining or Terminating Representation); 3.2 (Expediting Litigation); 3.3(a)(1) (Candor Toward the Tribunal); 3.4(c) (Fairness to Opposing Party and Counsel); 4.2 (Communication with a Person Represented by Counsel); 4.4(a)(1) (Respect for the Rights of Third Persons); 8.1(a) (Bar Admission and Disciplinary Matters); 8.2(a) (Judicial and Legal Officials); 8.4(c) (Misconduct-Dishonesty/Fraud/Deceit/Misrepresentation); and 8.4(d) (Misconduct-Administration of Justice).

ARTHUR C. GRISHAM, BPR NO. 001071
HAMILTON COUNTY

On April 27, 2026, the Supreme Court of Tennessee permanently disbarred Arthur C. Grisham, Jr., pursuant to Tennessee Supreme Court Rule 9, section 12.1.

Mr. Grisham, during the representation of a client, knowingly and repeatedly failed to respond to court orders, pleadings, and discovery requests he received; failed to communicate with his client regarding the impact of his failure to respond to the court, pleadings, and discovery requests; and by failed to inform his client of the resulting dismissal of his action. Further, Mr. Grisham knowingly filed an appeal without informing his client and obtaining authorization. Finally, Mr. Grisham knowingly ignored court orders to correct deficient pleadings, which resulted in the dismissal of the appeal and appellate costs being taxed to his client.

After reviewing the judgment of the Hearing Panel pursuant to Tenn. Sup. Ct. R. 9, §15.4(b) and (c), the Supreme Court determined Mr. Grisham engaged in pervasive misconduct over several years, causing actual harm to his clients. The Court conducted a comparative analysis of similar cases and reviewed the applicable ABA Standards for Imposing Lawyer Sanctions and concluded that permanent disbarment was warranted. Accordingly, the Court modified the judgment of the Panel from a (10) year suspension to permanent disbarment for conduct that violated Tennessee Rules of Professional Conduct 1.3 (diligence) and 1.4 (communication).

Mr. Grisham must comply with the obligations of Tennessee Supreme Court Rule 9, section 28.1 regarding the obligations and responsibilities of disbarred attorneys.

JAMES NATHAN HARGIS, BPR NO. 035171
PUTNAM COUNTY

On June 18, 2026, the Supreme Court of Tennessee permanently disbarred James Nathan Hargis from the practice of law. Pursuant to Tennessee Supreme Court Rule 9, Section 23.1, Mr. Hargis delivered to the Board of Professional Responsibility his Affidavit in Support of Permanent Disbarment by Consent affirming he could not successfully defend himself against charges detailed in pending disciplinary File Nos. 100675-2024-4-MH-INV; 101624-2025-4-MH-INV; 101994-2026-4-TT-INV; 102014-2026-4-TT-INV; 102021-2026-4-TT-INV; 102041 2026-4-TT-INV; and 102081-2026-4-TT-INV. Mr. Hargis misappropriated and converted client and third-party funds in violation of Rules of Professional Conduct 8.4 (misconduct).

On April 13, 2026, the Supreme Court of Tennessee temporarily suspended James Nathan Hargis from the practice of law upon finding that Mr. Hargis misappropriated client and third-party funds and posed a threat of substantial harm to the public. The Order of Temporary Suspension (Case No. M2026-00517-SC-BAR-BP) was dissolved upon entry of the June 11, 2026, Order of Enforcement.

Mr. Hargis must comply with the requirements of Tennessee Supreme Court Rule 9, Section 28 regarding the obligations and responsibilities of disbarred attorneys and is not eligible for reinstatement to the practice of law in this state.

CONNIE REGULI, BPR NO. 016867
WILLIAMSON COUNTY

Effective July 20, 2026, the Supreme Court of Tennessee permanently disbarred Connie Lynn Reguli from the practice of law. The Supreme Court largely affirmed the decision of the Williamson County Circuit Court and the disciplinary Hearing Panel finding Ms. Reguli violated the Rules of Professional Conduct based on a pattern of misconduct in a series of complaints, and the Court affirmed that disbarment was the appropriate sanction.

Ms. Reguli posted hyperbolic commentary on social media with false allegations about judges and judicial officials, publicly disclosed personal information of judges and justice system officials, urged her social media followers to send them harassing messages, intimidated judges and justice system officials, spread disinformation and conspiracy theories, and defied court orders. Her public comments to social media followers indicated she wished physical harm to judges and justice system officials, prompting them to fear for their safety and that of their families. In defiance of a protective order and an Amber Alert for a child in danger, Ms. Reguli enabled a client to evade law enforcement by supplying the client with a burner phone and hiding the client and her child inside her own home. All of Ms. Reguli's actions were connected to judicial proceedings in which she was participating.

The Court affirmed the finding that Ms. Reguli's misconduct violated Tennessee Rules of Professional Conduct 1.2(d) (Scope of Representation and Allocation of Authority Between Client and Lawyer); 3.1 (Meritorious Claims and Contentions); 3.3(a)(1), (e), and (f) (Candor Towards the Tribunal); 3.4(c) (Fairness to Opposing Party and Counsel); 3.5(a) and (e) (Impartiality and Decorum of the Tribunal); 3.6(a) (Trial Publicity); 4.2 (Communication with a Person Represented by Counsel) or 4.3 (Dealing with an Unrepresented Person); 4.4(a)(1) (Respect for the Rights of a Third Person); 5.1 (Responsibilities of Partners, Managers, and Supervisory Lawyers); 8.1 (Bar Admissions and Disciplinary Matters); 8.2(a)(1) and (2) (Judicial and Legal Officials); and 8.4(a), (c), and (d) (Misconduct).

Ms. Reguli must comply with the requirements of Tennessee Supreme Court Rule 9, Section 28.1 regarding the obligations and responsibilities of disbarred attorneys.

SUSPENSIONS

JEFFREY DENNIS JOHNSON, BPR NO. 029704
WASHINGTON COUNTY

Effective April 1, 2026, the Supreme Court of Tennessee suspended Jeffrey Dennis Johnson from the practice of law for two (2) years, with thirty (30) days to be served as an active suspension pursuant to Tennessee Supreme Court Rule 9, Section 12.2, and the remainder to be served on probation conditioned upon Mr. Johnson's engagement of a practice monitor, taking of additional CLE hours, and payment of incurred litigation costs.

Mr. Johnson represented a client in a criminal matter after representing the client in a separate criminal matter some years previously. The new representation was improperly conditioned upon the client making outstanding

payments for the prior representation. In a subsequent motion to withdraw from the most recent representation, Mr. Johnson made derogatory and disparaging statements about his client, and revealed confidential information related to the representation of the client without the client's consent.

Mr. Johnson executed a Conditional Guilty Plea acknowledging his conduct violated Tennessee Rules of Professional Conduct ("RPC") 1.6 (confidentiality), 1.7 (conflict of interest), 1.9 (duties to former clients), 1.16 (declining or terminating representation), 3.5(e) (decorum of the tribunal), and 8.4(d) (misconduct prejudicial to the administration of justice).

Mr. Johnson must comply with the requirements of Tennessee Supreme Court Rule 9, Sections 28 and 30.4, regarding the obligations and responsibilities of suspended attorneys and the procedure for reinstatement.

PATRICK BRYANT HAWLEY, BPR NO. 028264
HAMILTON COUNTY

On May 11, 2026, the Tennessee Supreme Court suspended Patrick Bryant Hawley from the practice of law until further orders of the Court pursuant to Tennessee Supreme Court Rule 9, Section 22.3. Mr. Hawley was adjudged guilty of one (1) count of Sexual Exploitation of Children.

Pursuant to the Order of the Supreme Court, the matter has been referred to the Board to institute formal proceedings to determine the extent of the final discipline to be imposed upon Mr. Hawley as a result of his conduct constituting a serious crime as defined by Tennessee Supreme Court Rule 9, Section 2.

Mr. Hawley must comply with the requirements of Tennessee Supreme Court Rule 9, Sections 28 and 30.4, regarding the obligations and responsibilities of suspended attorneys.

JASON SCOTT MANGRUM, BPR NO. 018098
WILLIAMSON COUNTY

Effective May 19, 2026, the Supreme Court of Tennessee suspended Jason Scott Mangrum from the practice of law for four (4) years pursuant to Tennessee Supreme Court Rule 9, Section 12.2, with five (5) months active suspension, and the remainder served on probation with conditions pursuant to Tennessee Supreme Court Rule 9, Section 14.1.

A Petition for Discipline containing two (2) complaints was filed by the Board alleging Mr. Mangrum failed to adequately represent clients, failed to abide by client wishes, failed to act diligently, failed to return client property, failed to respond to discovery, failed to respond to dispositive motions, dismissed a party and claim without authorization from the client, made frivolous claims, and failed to communicate.

Mr. Mangrum executed a conditional guilty plea acknowledging his conduct violated Tennessee Rules of Professional Conduct 1.2 (scope of representation), 1.3 (diligence), 1.4 (communication), 1.15(d) (safekeeping property), 1.16 (terminating representation), 3.1 (meritorious claims), 3.2 (expediting litigation), 3.4 (fairness to opposing party and counsel), and 8.4 (misconduct).

Mr. Mangrum must comply with the requirements of Tennessee Supreme Court Rule 9, Sections 28 and 30.4, regarding the obligations and responsibilities of suspended attorneys and the procedure for reinstatement.

SAMUEL ERVIN WHITE, BPR NO. 029973
SULLIVAN COUNTY

Effective June 25, 2026, the Supreme Court of Tennessee suspended Samuel Ervin from the practice of law for six (6) years pursuant to Tennessee Supreme Court Rule 9, Section 12.2, with four (4) years active suspension, and the remainder served on probation with conditions pursuant to Tennessee Supreme Court Rule 9, Section 14.1.

A Petition for Discipline containing two (2) disciplinary complaints was filed by the Board. In the first matter, Mr. White failed to comply with a Tennessee Supreme Court reinstatement order imposing numerous conditions including engaging a practice monitor and submitting the required practice monitor reports and engaging a certified public accountant to review his trust account and submit a report. In the second matter, Mr. White repeatedly misled his client to believe a petition had been filed and set for hearing. In addition, Mr. White delayed over two (2) years filing the petition for which he was retained and failed to promptly refund the retainer as represented to his client.

Mr. White executed a conditional guilty plea acknowledging his conduct violated Tennessee Rules of Professional Conduct 1.1 (competence), 1.3 (diligence), 1.4 (communication), 1.5(d) (fees), 1.16 (terminating representation) 3.2 (expediting litigation), 3.4 (fairness to opposing party and counsel), and 8.4 (misconduct)

Mr. White must comply with the requirements of Tennessee Supreme Court Rule 9, Sections 28 and 30.4, regarding the obligations and responsibilities of suspended attorneys and the procedure for reinstatement.

STEVEN CARL FRAZIER, BPR NO. 007098
SULLIVAN COUNTY

Effective July 14, 2026, the Supreme Court of Tennessee suspended Steven Carl Frazier from the practice of law for nine (9) months pursuant to Tennessee Supreme Court Rule 9, Section 12.2, with thirty (30) days to be served as an active suspension, and the remainder served on probation with conditions pursuant to Tennessee Supreme Court Rule 9, Section 14.1. Conditions of probation include employment of a practice monitor for the remaining eight (8) months of probation and incurring no new complaints of misconduct during the period of active suspension and probation.

A Petition for Discipline containing three (3) complaints was filed by the Board alleging Mr. Frazier failed to adequately represent his clients, failed to reasonably communicate with his clients, failed to act diligently, and failed to expedite litigation.

Mr. Frazier executed a conditional guilty plea acknowledging his conduct violated Tennessee Rules of Professional Conduct 1.2 (scope of representation), 1.3 (diligence), 1.4 (communication), 1.5 (fees), 1.16 (terminating representation), 3.2 (expediting litigation), and 8.4 (misconduct).

Mr. Frazier must comply with the requirements of Tennessee Supreme Court Rule 9, Sections 28 and 30.4, regarding the obligations and responsibilities of suspended attorneys and the procedure for reinstatement. Reinstatement to the active practice of law is further conditioned upon Mr. Frazier meeting all CLE requirements, payment of all registration and professional privilege taxes, payment of all Board and court costs assessed in this matter, and attendance at the Board of Professional Responsibility's ethics workshop.

KIRK D. CATRON, BPR NO. 023552
RUTHERFORD COUNTY

Effective August 10, 2026, the Supreme Court of Tennessee suspended Kirk D. Catron from the practice of law for six (6) months pursuant to Tennessee Supreme Court Rule 9, Section 12.2, with thirty (30) days active suspension, and the remainder served on probation with conditions pursuant to Tennessee Supreme Court Rule 9, Section 14.1.

A Petition for Discipline containing two (2) complaints was filed by the Board wherein Mr. Catron, in his effort to withdraw from representation, filed a Motion to Withdraw and attached an exhibit to the Motion containing pages of confidential communications between himself and his client. The inclusion of the confidential information was not authorized and no exception to the prohibition of disclosing client confidential information existed. In the second complaint, Mr. Catron failed to diligently represent his client in a domestic relations matter and further failed to protect his client's interest during a period of time Mr. Catron was unavailable.

Mr. Catron executed a conditional guilty plea acknowledging his conduct violated Tennessee Rules of Professional Conduct 1.3 (diligence), 1.4 (communication), 1.6 (confidentiality of information), 1.16 (terminating representation), and 8.4 (misconduct).

Mr. Catron must comply with the requirements of Tennessee Supreme Court Rule 9, Sections 28 and 30.4, regarding the obligations and responsibilities of suspended attorneys and the procedure for reinstatement.

CARL ALLEN ROBERTS, BPR NO. 033509
CARTER COUNTY

Effective August 14, 2026, the Supreme Court of Tennessee suspended Carl Allen Roberts from the practice of law for nine (9) months pursuant to Tennessee Supreme Court Rule 9, Section 12.2, with thirty (30) days to be served as an active suspension, and the remainder served on probation with conditions including (1) engagement of a Practice Monitor for the remaining period of probation following reinstatement, (2) incurring no new complaints of misconduct during the period of active suspension and probation, and (3) completion of the Board of Professional Responsibility's ethics workshop.

A Petition for Discipline containing three (3) complaints was filed by the Board alleging that Mr. Roberts failed to act diligently, failed to reasonably communicate with his clients, failed to timely withdraw when it was mandatory to do so, failed to expedite litigation, knowingly disobeyed an obligation under the rules of a tribunal, and engaged in conduct contrary to administration of justice.

Mr. Roberts executed a conditional guilty plea acknowledging his conduct violated Tennessee Rules of Professional Conduct 1.3 (diligence), 1.4 (communication), 1.16 (declining or terminating representation), 3.2 (expediting litigation), 3.4 (fairness to opposing party and counsel), and 8.4 (misconduct).

Mr. Roberts must comply with the requirements of Tennessee Supreme Court Rule 9, Sections 28 and 30.4, regarding the obligations and responsibilities of suspended attorneys and the procedure for reinstatement.

WILLIAM AARON FIX, BPR NO. 032102
KNOX COUNTY

Effective August 21, 2026, the Supreme Court of Tennessee suspended William Aaron Fix from the practice of law for two (2) years and six (6) months pursuant to Tennessee Supreme Court Rule 9, Section 12.2, with one (1) year to be served as an active suspension, and the remainder served on probation with conditions pursuant to Tennessee Supreme Court Rule 9, Section 14.1. Conditions of probation include employment of a practice monitor during any period of probation following successful reinstatement and incurring no new complaints of misconduct during the period of active suspension and probation.

In the seven (7) disciplinary complaints submitted to the Board, Mr. Fix: (1) failed to provide competent representation to his clients, (2) failed to act diligently in his representation, (3) failed to reasonably communicate with his clients, (4) accepted fees and did not perform the services to which he was retained, (5) failed to return fees that were not earned, (6) failed to promptly and timely withdraw from his cases when he was required to do so, (7) failed to expedite litigation, and (8) and engaged in conduct that was dishonest and contrary to the administration of justice.

Mr. Fix executed a conditional guilty plea acknowledging his conduct violated Tennessee Rules of Professional Conduct 1.1 (competence), 1.3 (diligence), 1.4 (communication), 1.5 (fees), 1.15 (safekeeping property and funds), 1.16 (declining or terminating representation), 3.2 (expediting litigation), and 8.4 (misconduct).

Mr. Fix must comply with the requirements of Tennessee Supreme Court Rule 9, Sections 28 and 30.4, regarding the obligations and responsibilities of suspended attorneys and the procedure for reinstatement. Reinstatement to the active practice of law is conditioned upon Mr. Fix meeting all CLE requirements, payment of all registration and professional privilege taxes, payment of all Board and court costs assessed in this matter, attendance at the Board of Professional Responsibility's ethics workshop, and payment of restitution to two clients.

WILLIAM HENRY JACKSON, BPR NO. 036633
TENNESSEE

By Order of Reciprocal Discipline entered by the Supreme Court of Tennessee on September 2, 2026, William Henry Jackson received a six (6) month and one (1) day suspension retroactive to April 17, 2026, with the suspension stayed for twenty-four (24) months, subject to the conditions outlined in the conditional admission agreement and those stated within the Order Approving Conditional Admission Agreement entered by the Supreme Court for the State of Nevada on April 17, 2026. Those conditions include requirements that Mr. Jackson complete twelve additional hours of CLE in legal ethics before the end of the probation period, maintain current contact information with the Nevada Office of Bar Counsel, remain in good standing with the Nevada State Bar, not engage in any future misconduct, engage a law practice mentor, and pay a $1,000.00 fine to the State Bar. Mr. Jackson's unethical conduct involved violations of Nevada Rules of Professional Conduct 5.4(a) (professional independence of a lawyer) and 7.2(a) (advertising).

On July 15, 2026, the Supreme Court entered a Notice of Reciprocal Discipline directing Mr. Jackson to inform the Court, within thirty (30) days of receipt of the Notice, why the discipline imposed by the Supreme Court of the State of Nevada should not be imposed in Tennessee. Mr. Jackson did not file a written response to the Supreme Court of Tennessee within the time prescribed.

This stayed suspension does not affect the attorney's ability to practice law, subject to continuing compliance with the terms and conditions of the probationary period.

FRED C. DANCE, BPR NO. 007004
WILLIAMSON COUNTY

Effective September 4, 2026, the Supreme Court of Tennessee suspended Fred. C. Dance from the practice of law for five (5) years, with three (3) years to be served on active suspension and the remainder on probation. After considering sanctions imposed in similar cases, the Supreme Court held that Mr. Dance should be suspended rather than disbarred.

A client retained Mr. Dance to represent him and his siblings in a wrongful death action. The case settled for $20,000, and the defendant issued a check for $20,000, payable to Mr. Dance's Interest on Lawyer Trust Account ("IOLTA"). Mr. Dance did not promptly disburse the settlement funds to his client. He instead used the funds to pay for personal expenses while ignoring his client's inquiries about the money. Mr. Dance did not disburse any funds to his client for nearly four (4) years. The hearing panel recommended Mr. Dance be disbarred, and the trial court affirmed this finding.

The Supreme Court clarified that it used a de novo standard to review a hearing panel's recommended punishment in an appeal under Tennessee Supreme Court Rule 9, section 33.1(d). The Court affirmed the hearing panel's finding that disbarment was the presumptive sanction and its application of the aggravating and mitigating factors. The Court reviewed discipline in comparative cases and modified the punishment from disbarment to suspension in the interest of uniformity. Mr. Dance must comply with the requirements of Tennessee Supreme Court Rule 9, Section 28.1 regarding the obligations and responsibilities of suspended attorneys.

BENJAMIN SETH ADAMS, BPR NO. 033184
SULLIVAN COUNTY

Effective September 14, 2026, the Supreme Court of Tennessee suspended Benjamin Seth Adams from the practice of law for one (1) year pursuant to Tennessee Supreme Court Rule 9, Section 12.2, with ninety (90) days to be served as an active suspension, and the remainder served on probation with conditions pursuant to Tennessee Supreme Court Rule 9, Section 14.1. Conditions of probation include employment of a practice monitor during any period of probation following successful reinstatement, incurring no new complaints of misconduct during the period of active suspension and probation, and attendance at the Board's ethics workshop.

A Petition for Discipline and Supplemental Petition for Discipline, containing a combined total of five (5) complaints, was filed by the Board alleging that Mr. Adams: (1) failed to provide competent representation to his clients, (2) exceeded the scope of his representation by failing to consult with his client prior to entering into an Agreed Order on his client's behalf, (3) failed to act diligently in his representation, (4) accepted fees and did not perform the services to which he was retained, (5) failed to return fees that were not earned, (6) failed to promptly and timely withdraw from his cases when he was required to do so, (7) failed to expedite litigation, and (8) engaged in conduct that was dishonest and contrary to the administration of justice.

Mr. Adams executed a conditional guilty plea acknowledging his conduct violated Tennessee Rules of Professional Conduct 1.1 (competence), 1.2 (scope of representation), 1.3 (diligence), 1.4 (communication), 1.5 (fees), 1.16 (declining or terminating representation), 3.2 (expediting litigation), and 8.4 (misconduct).

Mr. Adams must comply with the requirements of Tennessee Supreme Court Rule 9, Sections 28 and 30.4, regarding the obligations and responsibilities of suspended attorneys and the procedure for reinstatement. Reinstatement to the active practice of law is conditioned upon Mr. Adams meeting all CLE requirements, payment of all registration and professional privilege taxes, payment of all Board and court costs assessed, and payment of restitution to two clients.

TEMPORARY SUSPENSIONS

JAMES NATHAN HARGIS, BPR NO. 035171
PUTNAM COUNTY

On April 13, 2026, the Supreme Court of Tennessee temporarily suspended James Nathan Hargis from the practice of law upon finding that Mr. Hargis misappropriated client and third-party funds and poses a threat of substantial harm to the public. Section 12.3(a) of Supreme Court Rule 9 provides for the immediate suspension of an attorney's license to practice law in cases where an attorney misappropriates funds to the attorney's own use or otherwise poses a threat of substantial harm to the public.

Mr. Hargis is immediately precluded from accepting any new cases, and he must cease representing existing clients by May 13, 2026. After May 13, 2026, Mr. Hargis shall not use any indicia of lawyer, legal assistant, or law clerk nor maintain a presence wherein the practice of law is conducted. Mr. Hargis must notify all clients being represented in pending matters, as well as co-counsel and opposing counsel, of the Supreme Court's Order suspending his law license and is required to deliver to all clients any papers or property to which they are entitled.

Mr. Hargis must comply with the requirements of Tennessee Supreme Court Rule 9, Sections 28 and 12.3(d), regarding the obligations and responsibilities of temporarily suspended attorneys and the procedure for reinstatement.

This suspension remains in effect until dissolution or modification by the Supreme Court. Mr. Hargis may, for good cause, request dissolution or modification of the suspension by petition to the Supreme Court.

DAVID ARTHR WALKER, BPR NO. 039452
BLOUNT COUNTY

On June 3, 2026, the Supreme Court of Tennessee temporarily suspended David Arthur Walker from the practice of law upon finding that Mr. Walker is substantially non-compliant with a Tennessee Lawyers Assistance Program monitoring agreement and poses a threat of substantial harm to the public. Section 12.3 of Supreme Court Rule 9 provides for the immediate summary suspension of an attorney's license to practice law

in cases where an attorney is substantially non-compliant with the Tennessee Lawyers Assistance Program monitoring agreement or deemed to pose a threat of substantial harm to the public.

Mr. Walker is immediately precluded from accepting any new cases, and he must cease representing existing clients by July 3, 2026. After July 3, 2026, Mr. Walker shall not use any indicia of lawyer, legal assistant, or law clerk nor maintain a presence wherein the practice of law is conducted. Mr. Walker must notify all clients being represented in pending matters, as well as co-counsel and opposing counsel, of the Supreme Court's Order suspending his law license and is required to deliver to all clients any papers or property to which they are entitled.

Mr. Walker must comply with the requirements of Tennessee Supreme Court Rule 9, Sections 28 and 12.3(d), regarding the obligations and responsibilities of temporarily suspended attorneys and the procedure for reinstatement.

This suspension remains in effect until dissolution or modification by the Supreme Court. Mr. Walker may, for good cause, request dissolution or modification of the suspension by petition to the Supreme Court.

TROY LEE BOWLIN, BPR NO. 025893
KNOX COUNTY

On June 3, 2026, the Supreme Court of Tennessee temporarily suspended Troy Lee Bowlin from the practice of law upon finding that Mr. Bowlin misappropriated client funds and poses a threat of substantial harm to the public. Section 12.3(a) of Supreme Court Rule 9 provides for the immediate suspension of an attorney's license to practice law in cases where an attorney misappropriates funds to the attorney's own use or otherwise poses a threat of substantial harm to the public.

Mr. Bowlin is immediately precluded from accepting any new cases, and he must cease representing existing clients by July 3, 2026. After July 3, 2026, Mr. Bowlin shall not use any indicia of lawyer, legal assistant, or law clerk nor maintain a presence wherein the practice of law is conducted. Mr. Bowlin must notify all clients being represented in pending matters, as well as co-counsel and opposing counsel, of the Supreme Court's Order suspending his law license and is required to deliver to all clients any papers or property to which they are entitled.

Mr. Bowlin must comply with the requirements of Tennessee Supreme Court Rule 9, Sections 28 and 12.3(d), regarding the obligations and responsibilities of temporarily suspended attorneys and the procedure for reinstatement.

This suspension remains in effect until dissolution or modification by the Supreme Court. Mr. Bowlin may, for good cause, request dissolution or modification of the suspension by petition to the Supreme Court.

K. SUZANNE MASTERS, BPR NO. 006569
KNOX COUNTY

On August 21, 2026, the Supreme Court of Tennessee temporarily suspended K. Suzanne Masters from the practice of law upon finding that Ms. Masters failed to respond to the Board of Professional Responsibility concerning one (1) complaint of misconduct.

Ms. Masters is immediately precluded from accepting any new cases and shall not use any indicia of lawyer, legal assistant, or law clerk nor maintain a presence where the practice of law is conducted.

Ms. Masters must notify all clients being represented in pending matters, as well as co-counsel and opposing counsel, of the Supreme Court's Order suspending her law license. Ms. Masters is required to withdraw from all representations and deliver to all clients any papers or property to which they are entitled.

Ms. Masters shall comply with the requirements of Tennessee Supreme Court Rule 9, Sections 28 and 12.3(d), regarding the obligations and responsibilities of temporarily suspended attorneys and the procedure for reinstatement.

This suspension remains in effect until dissolution or modification by the Supreme Court. Ms. Masters may, for good cause, request dissolution or modification of the suspension by petition to the Supreme Court.

JULIA ANNA TRANT, BPR NO. 035925
KNOX COUNTY

On September 4, 2026, the Supreme Court of Tennessee temporarily suspended Julia Anna Trant from the practice of law upon finding that Ms. Trant failed to respond to the Board of Professional Responsibility concerning one (1) complaint of misconduct.

Ms. Trant is immediately precluded from accepting any new cases and must cease representing existing clients by October 4, 2026. After October 4, 2026, Ms. Trant shall not use any indicia of lawyer, legal assistant, or law clerk nor maintain a presence where the practice of law is conducted.

Ms. Trant must notify all clients being represented in pending matters, as well as co-counsel and opposing counsel, of the Supreme Court's Order suspending her law license. Ms. Trant is required to withdraw from all representation and deliver to all clients any papers or property to which they are entitled.

Ms. Trant shall comply with the requirements of Tennessee Supreme Court Rule 9, Sections 28 and 12.3(d), regarding the obligations and responsibilities of temporarily suspended attorneys and the procedure for reinstatement.

This suspension remains in effect until dissolution or modification by the Supreme Court. Ms. Trant may, for good cause, request dissolution or modification of the suspension by petition to the Supreme Court.

LISA GAYLE WOOLLEY, BPR NO. 038112
WILSON COUNTY

On September 16, 2026, the Supreme Court of Tennessee temporarily suspended Lisa Gayle Woolley from the practice of law upon finding that Ms. Woolley failed to respond to the Board of Professional Responsibility concerning one (1) complaint of misconduct.

Ms. Woolley is immediately precluded from accepting any new cases and must cease representing existing clients by October 16, 2026. After October 16, 2026, Ms. Woolley shall not use any indicia of lawyer, legal assistant, or law clerk nor maintain a presence where the practice of law is conducted.

Ms. Woolley must notify all clients being represented in pending matters, as well as co-counsel and opposing counsel, of the Supreme Court's Order suspending her law license. Ms. Woolley is required to withdraw from all representation and deliver to all clients any papers or property to which they are entitled.

Ms. Woolley shall comply with the requirements of Tennessee Supreme Court Rule 9, Sections 28 and 12.3(d), regarding the obligations and responsibilities of temporarily suspended attorneys and the procedure for reinstatement.

This suspension remains in effect until dissolution or modification by the Supreme Court. Ms. Woolley may, for good cause, request dissolution or modification of the suspension by petition to the Supreme Court.

MITCHELL RAY MILLER, BPR NO. 036126
WILLIAMSON COUNTY

On September 24, 2026, the Supreme Court of Tennessee temporarily suspended Mitchell Ray Miller from the practice of law upon finding that Mr. Miller failed to respond to the Board of Professional Responsibility concerning six (6) complaints of misconduct.

Mr. Miller is currently suspended from the practice of law pursuant to an Order of Enforcement entered by the Supreme Court of Tennessee (Docket No. M2025-01282-SC-BAR-BP) on September 5, 2025, and prohibited from engaging in the practice of law or using any indicia of lawyer, legal assistant, or law clerk or maintaining a presence where the practice of law is conducted.

Mr. Miller, to the extent he has not complied with the Order of Enforcement entered previously, shall withdraw from all representation and deliver to all clients any papers or property to which they are entitled.

Mr. Miller shall comply with the requirements of Tennessee Supreme Court Rule 9, Sections 28 and 12.3(d), regarding the obligations and responsibilities of temporarily suspended attorneys and the procedure for dissolution or modification.

This temporary suspension remains in effect until dissolution or modification by the Supreme Court. Mr. Miller may, for good cause, request dissolution or modification of the temporary suspension by petition to the Supreme Court.

PUBLIC CENSURES

THEODORE IVER JONES, BPR NO. 011017
SHELBY COUNTY

On April 1, 2026, Theodore Iver Jones, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Mr. Jones was hired to represent a client to obtain clear title on two separate properties. Throughout the representation, Mr. Jones failed to act diligently on behalf of his client.

Additionally, Mr. Jones misrepresented the status of the case to his client. By these acts, Mr. Jones has violated Rules of Professional Conduct 1.3 (diligence), and 8.4 (misconduct) and is hereby Publicly Censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

DAVID BENNETT LAROCHE, BPR NO. 025516
RUTHERFORD COUNTY

On April 7, 2026, David Bennett LaRoche, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Previously, Mr. LaRoche was issued a Private Reprimand and was ordered to refund his client's money. Mr. LaRoche failed to meet the condition of his Private Reprimand and did not refund his client. Therefore, Mr. LaRoche is being Publicly Censure for his failure to comply with the condition of the Private Reprimand.

On July 30, 2025, Mr. LaRoche was issued a Private Reprimand under TBPR Case No. 100906-2025-4 MH-INV for violations of the Rules of Professional Conduct 1.1 (competence); 1.3 (diligence); 1.4 (communication); and 1.16 (declining or terminating representation). Additionally, as a condition of the Private Reprimand, Mr. LaRoche was ordered to refund $500 to the Complainant within 60 days of issuance of the Private Reprimand. Mr. LaRoche failed to refund the money and failed to respond to a lawful demand for information from Disciplinary Counsel concerning this matter.

By these acts, Mr. LaRoche has violated Rules of Professional Conduct 3.1 (meritorious claims and contentions), 8.1 (bar admission and disciplinary matters), and 8.4 (misconduct) and is hereby Publicly Censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

AGNES SIPPLE TRUJILLO, BPR NO. 025229
JEFFERSON COUNTY

On April 7, 2026, Agnes Sipple Trujillo, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

In an appeal from Campbell County Chancery Court, Ms. Trujillo failed to file the trial transcript with the appellate court under Tenn. R. App. P. 24 and failed to file or request an extension to file a response to two (2) dismissal motions, resulting in the client's case being dismissed. Ms. Trujillo failed to provide her client with copies of pleadings in his case and failed to notify client that his case was dismissed. While Ms. Trujillo's service agreement provided for a nonrefundable fee of $7500, such fees are subject to the reasonableness standard and based on the de minimis legal services provided, Ms. Trujillo's fee was not reasonable. Ms. Trujillo failed to maintain the client's file and never returned the file to client, hindering his ability to obtain alternate counsel to seek further relief following the dismissal.

By these acts, Ms. Trujillo has violated Rules of Professional Conduct 1.1 (competence), 1.3 (diligence), 1.4(a) (communication), 1.5(a) (fees), 1.15(d) (safekeeping property and funds), and 8.4(d) (prejudice to the administration of justice) and is hereby Publicly Censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

EMILY CROSS MORLEY, BPR NO. 041583
HAWKINS COUNTY

On April 7, 2026, Emily Cross Morley, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Ms. Morley was hired to represent a client after a Petition to recover Personal Property was filed against her client. Ms. Morley failed to notify her client of the trial date. The court found that Ms. Morley's client committed wrongful conversion and entered a judgement in favor of the opposing side in September of 2024. Ms. Morley failed to communicate with her client about the outcome of the trial and judgment until October 2025.

By these acts, Ms. Morley has violated Rules of Professional Conduct 1.3 (diligence), 1.4 (communication), 3.2 (expediting litigation), and 8.4 (misconduct) and is hereby Publicly Censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

ZACHARY TY CARDEN, BPR NO. 036752
DAVIDSON COUNTY

On April 13, 2026, Zachary Ty Carden, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

In the first complaint, Mr. Carden represented a criminal defendant in connection with adjustment of jail credits and seeking a furlough. Mr. Carden delayed in taking action for the client and failed to respond to the client's communications.

In the second complaint, Mr. Carden represented a client in pursuing a custody matter. Mr. Carden completed limited investigation of the client's legal claims but did not file a petition or take other legal action. Mr. Carden also failed to respond to his client's communications, which ultimately resulted in the client discharging Mr. Carden. Following his discharge, Mr. Carden did not refund an appropriate portion of the client's fee.

In the third complaint, Mr. Carden represented a client in pursuing contempt sanctions in a post-divorce matter. Mr. Carden prepared a draft petition but did not complete any other work for the client. Mr. Carden also failed to respond to the client's requests for information about the status of the representation.

By these acts, Zachary Ty Carden has violated Rules of Professional Conduct 1.3 (diligence), 1.4 (communication), 1.5 (fees), and 1.16(d) (duties following withdrawal or discharge) and is hereby publicly censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

MARGARET JANE POWERS, BPR NO. 007328
CUMBERLAND COUNTY

On April 13, 2026, Margaret Jane Powers, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Ms. Powers agreed to represent a client in probating an estate. Ms. Powers' usual practice was to charge a security retainer and obtain the client's signature on a fee agreement confirming that the retainer was nonrefundable. Due to an inadvertent office error, no fee agreement was signed by the client. After undertaking the representation, Ms. Powers delayed in taking action for the client. After being discharged, Ms. Powers declined to refund the unearned portion of her security retainer despite being aware that no fee agreement had been signed by the client providing that the fee was nonrefundable. Ms. Powers also delayed in returning prepaid litigation expenses to the client.

By these acts, Margaret Jane Powers has violated Rules of Professional Conduct 1.3 (diligence), RPC 1.5(f) (fees), 1.15 (safeguarding client property), and 1.16(d) (duties following withdrawal or discharge) and is hereby publicly censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

BETH ANGEL GARRISON, BPR NO. 024434
SUMNER COUNTY

On April 15, 2026, Beth Angel Garrison, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

A client hired Ms. Garrison to prepare an agreed order for reduction of his child support to which the other parent had agreed. Ms. Garrison prepared the order and sent it to opposing counsel who requested minor changes. Ms. Garrison failed to take any action for eight months, until she was contacted by her client. At that time, she prepared the revised order and sent it to the client. After the client approved, however, Ms. Garrison failed to send the agreement to opposing counsel.

By these acts, Beth Angel Garrison has violated Rules of Professional Conduct 1.3 (diligence), 1.4 (communication), and 1.16 (termination of representation) and is hereby Publicly Censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

DALEN L. P. FARMER, BPR NO. 012629
RUTHERFORD COUNTY

On April 23, 2026, Dalen L. P. Farmer, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Mr. Farmer was hired by a client to defend her in a partition and promissory fraud action. A motion to compel was filed against his client for failing to provide discovery responses. Mr. Farmer did not provide a copy of the

motion to his client, and he did not file a response. Mr. Farmer failed to appear in court on the motion. The plaintiff received a judgment of default and sanctions against the client.

By these acts, Dalen L. P. Farmer has violated Rules of Professional Conduct 1.1 (competence), 1.3 (diligence), 1.4 (communication), 1.5 (fees), 8.4 (prejudice to the administration of justice), 3.4 (fairness to opposing party), and 8.1 (disciplinary matters) and is hereby Publicly Censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

CYNTHIA JANE BOHN, BPR NO. 016592
DAVIDSON COUNTY

On April 23, 2026, Cynthia Jane Bohn, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Ms. Bohn represented the mother in a custody dispute in which a guardian ad litem had been appointed for the children. Ms. Bohn met with the two minor children without the guardian ad litem present. Ms. Bohn discussed with the children the pending litigation, she informed them they could hypothetically be put into foster care under some circumstances, and she grabbed the arm of one child and held it during the meeting. Ms. Bohn was later disqualified from representing the mother by the court.

By these acts, Cynthia Jane Bohn has violated Rules of Professional Conduct 4.2 (communication with a person represented by counsel), 4.4 (respect for rights of third persons), and 8.4(d) (prejudice to the administration of justice) and is hereby Publicly Censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

ROBERT BRIAN DEBUSK, BPR NO. 035106
KNOX COUNTY

On April 28, 2026, Robert Brian DeBusk, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Mr. DeBusk worked as an assistant district attorney, and he discovered an email that a defendant had sent from jail to his attorney. This intercepted email became part of the basis for a motion to disqualify the district attorney's office. Mr. DeBusk was subpoenaed to testify at the hearing on the motion to disqualify. While in the hallway prior to testifying, Mr. DeBusk discussed the facts with an attorney not related to this matter. He was then called to testify. When asked about the facts, Mr. DeBusk stated "I don't recall" which was contrary to what he had discussed in the hall. He was further pressed on his recollection, and Mr. DeBusk refused to answer by pleading the "Fifth." Finally, Mr. DeBusk testified substantively about the facts of the matter.

By these acts, Robert Brian DeBusk has violated Rules of Professional 8.4(c) (conduct involving dishonesty) and 8.4(d) (prejudice to the administration of justice) and is hereby Publicly Censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

SORNAVIDYA SABA SANKAR, BPR NO. 037964
DAVIDSON COUNTY

On June 17, 2026, Sornavidya Saba Sankar, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Ms. Sankar admittedly abused substances and experienced mental health issues. During such time, Ms. Sankar failed to communicate with her clients about their cases being reset due to her circumstances, failed to appear in court without contacting her clients or the Court, and failed to respond to the Court's inquiries into her status, thereby delaying litigation. Ms. Sankar represented to the Court that she would appear at a hearing then failed to attend, resulting in multiple cases being reset and new attorneys being appointed to replace her. In her condition, Ms. Sankar failed to act competently in representing her clients. She also made multiple misrepresentations to a colleague about self-reporting to the Board.

By these acts, Ms. Sankar has violated Rules of Professional Conduct 1.1 (competence), 1.3 (diligence), 1.4(a)(3) (communication), 3.2 (expediting litigation), 8.4(c) and 8.4(d) (misconduct) and is hereby Publicly Censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

ROBERT DEAN FLYNN, BPR NO. 007941
SHELBY COUNTY

On July 6, 2026, Robert Dean Flynn, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Over the course of six months, Mr. Flynn knowingly comingled personal and client funds in his firm's IOLTA and paid personal and operating expenses from the account. Mr. Flynn held a client's funds for 49 days, during which time the IOLTA fell below the client's held balance of $3273.70 for a week before the account became overdrawn, placing the client's funds at risk. No clients suffered actual harm from Mr. Flynn's actions.

By these acts, Mr. Flynn, has violated Rules of Professional Conduct 1.15(a), (b), and (c) (safekeeping property and funds) and is hereby Publicly Censured for this violation.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

JULIA ANNA TRANT, BPR NO. 035925
KNOX COUNTY

On July 10, 2026, Julia Anna Trant, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Ms. Trant represented a client before the Tennessee Court of Appeals. Ms. Trant failed to timely file documents as required by the Court.

By these acts, Ms. Trant violated Rules of Professional Conduct 1.3 (diligence), 3.2 (expediting litigation), 3.4 (fairness to opposing party and counsel), and 8.4 (prejudice to the administration of justice) and is hereby Publicly Censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

PAUL FORREST CRAIG, BPR NO. 018359
SHELBY COUNTY

On July 10, 2026, Paul Forrest Craig, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

In the representation of a client in a property matter, Mr. Craig failed to communicate with his client and failed to provide his client with a complete copy of his file for over five months despite multiple requests.

By these acts, Mr. Craig has violated Rules of Professional Conduct 1.4 (communication), 1.15 (safekeeping property and funds), and 1.16 (declining or terminating representation) and is hereby Publicly Censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

VICTORIA WILLIAMSON GILLARD, BPR NO. 022803
SHELBY COUNTY

On July 10, 2026, Victoria Williamson Gillard, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Ms. Gillard was representing a client in a wrongful death case. The parties reached a settlement, and Ms. Gillard deposited the settlement money in her Trust Account in December of 2019. Ms. Gillard indicated she had some concerns about her client's mental health and therefore did not provide her client with the settlement funds. For years Ms. Gillard held the money in her Trust Account without taking any action. Finally, on August 18, 2025, Ms. Gillard filed a Petition for Interpleader. On October 16, 2025, the Court filed an Order directing Ms. Gillard to release the money held in her Trust Account to the Madison County Clerk and Master. On October 18, 2025, Mr. Gillard released the required funds to the Madison County Chancery Court. Ms. Gillard also failed to communicate with her client over the time period she held the money in her Trust Account.

By these acts, Ms. Gillard has violated Rules of Professional Conduct 1.1 (competence), 1.3 (diligence), 1.4 (communication), 1.15 (safekeeping property and funds), and 8.4 (misconduct) and is hereby Publicly Censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

DAVID A. STUART, BPR NO. 006770
ANDERSON COUNTY

On July 10, 2026, David A. Stuart, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Mr. Stuart is the owner of a law firm. After agreeing to represent a client in an immigration matter, Mr. Stuart assigned the calendaring of applicable deadlines to a nonlawyer in the firm. The nonlawyer failed to calendar the deadline for the filing of a pleading required by a scheduling order in the client's legal matter. As a result of the error, a request was filed by government counsel for entry of an order of removal. The nonlawyer overlooked the email transmitting notice of the request, and, as a result, no response to the request was filed and an order of removal was entered. Following notice of entry of the order of removal, Mr. Stuart filed a motion to reopen which was granted by the tribunal.

By these acts, David A. Stuart has violated Rule of Professional Conduct 5.1(a) (Responsibilities of Partners, Managers, and Supervisory Lawyers) and is hereby Publicly Censured for this violation.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

JOHN DAVID CARVER, BPR NO. 034712
DAVIDSON COUNTY

On July 17, 2026, John David Carver, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Mr. Carver's law license was administratively suspended due to his failure to comply with the requirements of the Tennessee Commission on Continuing Legal Education. Mr. Carver was aware of his failure to comply with the requirements. Mr. Carver practiced law for two months, including participation in nine court hearings in three counties, while his license was suspended.

By these acts, John David Carver has violated Rules of Professional Conduct 5.5 (unauthorized practice of law), 3.4 (fairness to opposing party and counsel), and 8.4(d) and (g) (misconduct) and is hereby Publicly Censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

ROBERT BRANDON WHITE, BPR NO. 022592
SEVIER COUNTY

On July 17, 2026, Robert Brandon White, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Mr. White entered a no contact order as part of criminal charges he received in a personal domestic matter. Five weeks later, Mr. White violated the terms of the no contact order.

In 2025, Mr. White missed four scheduled court dates in different courts, without notice to the Court or opposing counsel, resulting in at least one notice to show cause and multiple rescheduled hearing dates.

By these acts, Robert Brandon White has violated Rules of Professional Conduct 1.3 (diligence), 3.4 (fairness to opposing party and counsel), 8.4(b), (d) and (g) (misconduct) and is hereby Publicly Censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

HAROLD WAYNE GRAVES, BPR NO. 009780
WASHINGTON COUNTY

On July 23, 2026, Harold Wayne Graves, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Mr. Graves agreed to represent a client in connection with a closed probate matter. The client was a named beneficiary who requested that Mr. Graves review the court record and other documentation to confirm that the estate had been properly administered. The fee agreement drafted by Mr. Graves and signed by the client failed to adequately define the scope of representation. After undertaking the representation, Mr. Graves delayed taking action for the client and failed to respond to the client's communications about the status of the representation. Following discharge, Mr. Graves failed to respond to the client's requests for her file materials and a refund of her fees.

By these acts, Harold Wayne Graves has violated Rules of Professional Conduct 1.3 (diligence), 1.4 (communication), 1.5(a) (fees), 1.5(b) (scope of representation), 1.15 (safekeeping property and funds), and 1.16(d) (terminating representation) and is hereby Publicly Censured for these violations. The Public Censure shall be conditioned on Mr. Graves's payment of $600.00 in restitution to the client within sixty (60) days of the date of entry.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

GEORGE E. COPPLE, BPR NO. 006411
WILLIAMSON COUNTY

On September 28, 2026, George E. Copple, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Mr. Copple provided a monetary loan to a friend, who then hired Mr. Copple on a legal matter. Mr. Copple stated in writing that he was not charging the friend a fee. As the matter got more complicated, Mr. Copple told the client he would begin billing hourly. Mr. Copple made multiple references to the personal loan that the client had not yet repaid. While the matter was on appeal, Mr. Copple filed a lawsuit against the client for attorney fees and payment of the personal loan.

By these acts, George E. Copple has violated Rules of Professional Conduct 1.7 (conflict of interest) and 1.8(a)(3)(e) (conflict of interest, specific rules) and is hereby publicly censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

STEPHANIE BEANAM JOHNSON, BPR NO. 030782
PUTNAM COUNTY

On September 29, 2026, Stephanie Branam Johnson, an attorney licensed to practice law in Tennessee, received a Public Censure from the Board of Professional Responsibility of the Tennessee Supreme Court.

Ms. Johnson represented a client in a probate proceeding and in pursuing an order of protection. When Ms. Johnson undertook the representation, she was a partner in a private firm. While the representation was ongoing, Ms. Johnson left the firm and opened a solo practice. Ms. Johnson failed to notify her client of the move. After being discharged by her client, Ms. Johnson did not respond to the client's request for an accounting of her fees. Ms. Johnson also failed to respond to a request for information from Disciplinary Counsel after the opening of the Board's investigation.

By these acts, Stephanie Branam Johnson has violated Rules of Professional Conduct 1.4 (communication), 1.16(d) (terminating representation), and 8.1(b) (bar admission and disciplinary matters) and is hereby publicly censured for these violations.

A Public Censure is a rebuke and warning to the attorney, but it does not affect the attorney's ability to practice law.

REINSTATEMENTS AND PROBATION

JEFFREY DENNIS JOHNSON, BPR NO. 029704
WASHINGTON COUNTY

By Order of the Tennessee Supreme Court entered April 30, 2026, Washington County attorney Jeffrey Dennis Johnson, shall be reinstated to the active practice of law on May 1, 2026.

On April 1, 2026, Jeffrey Dennis Johnson was suspended by the Supreme Court of Tennessee for two (2) years with thirty (30) days to be served as an active suspension and the remainder on probation subject to conditions including employment of a practice monitor during the probationary period and repayment of all Board costs. Mr. Johnson filed a Petition for Reinstatement to the practice of law pursuant to Tennessee Supreme Court Rule 9, Section 30.4(c) on April 1, 2026. The Board found the petition to be satisfactory and submitted an Order of Reinstatement to the Court.

Mr. Johnson's reinstatement to the active practice of law is conditioned upon his continuing compliance with, and timely satisfaction of, the conditions set forth in the Order of the Supreme Court entered April 1, 2026.

KIRK D. CATRON, BPR NO. 023552
RUTHERFORD COUNTY

By Order of the Tennessee Supreme Court entered September 15, 2026, Kirk D. Catron was reinstated to the active practice of law.

On August 10, 2026, Mr. Catron was suspended by the Supreme Court of Tennessee for six (6) months with thirty (30) days active suspension and the remainder on probation conditioned upon his continuing compliance with and timely satisfaction of the conditions set forth in the Order of Enforcement entered August 10, 2026. Mr. Catron filed a Petition for Reinstatement to the practice of law pursuant to Tennessee Supreme Court Rule 9, Section 30.4(c) on September 8, 2026. The Board found the Petition was satisfactory and submitted an Order of Reinstatement to the Court.

CARL ALLEN ROBERTS, BPR NO. 033509
CARTER COUNTY

By Order of the Tennessee Supreme Court entered September 23, 2026, Carl Allen Roberts was reinstated to the active practice of law.

On August 14, 2026, Mr. Roberts was suspended by the Supreme Court of Tennessee for nine (9) months with thirty (30) days active suspension and the remainder on probation. Mr. Roberts filed a Petition for Reinstatement to the practice of law pursuant to Tennessee Supreme Court Rule 9, Section 30.4(c) on September 4, 2026. The Board found the Petition was satisfactory and submitted an Order of Reinstatement to the Court.

Mr. Roberts' reinstatement to the active practice of law is conditioned upon his engagement with a practice monitor during the probationary period, nine (9) months, and his attendance at the Board's Ethics Workshop in November 2026.

DISABILITY INACTIVE

MICHAEL FEARNLEY, BPR NO. 011817
SHELBY COUNTY

By Order of the Tennessee Supreme Court entered April 20, 2026, the law license of attorney Michael Fearnley was transferred to disability inactive status pursuant to Section 27.4 of Tennessee Supreme Court Rule 9.

Mr. Fearnley cannot practice law while on disability inactive status and shall comply with the requirements of Tennessee Supreme Court Rule 9, Section 28, regarding the obligations and responsibilities of attorneys transferred to disability inactive status. Mr. Fearnley may return to the practice of law after reinstatement by the Tennessee Supreme Court upon showing that his disability has been removed in accordance with Tennessee Supreme Court Rule 9, Section 27.7.

COURTNEY MICHELLE ROGERS PERRIN, BPR NO. 025664
DAVIDSON COUNTY

By Order of the Tennessee Supreme Court entered April 29, 2026, the law license of Courtney Michelle Rogers Perrin was transferred to disability inactive status pursuant to Section 27.3 of Tennessee Supreme Court Rule 9.

Ms. Rogers Perrin cannot practice law while on disability inactive status and shall comply with the requirements of Tennessee Supreme Court Rule 9, Section 28, regarding the obligations and responsibilities of attorneys transferred to disability inactive status. Ms. Rogers Perrin may return to the active practice of law by filing a petition in accordance with Tennessee Supreme Court Rule 9, Section 27.7 and thereafter, upon entry of an order by the Tennessee Supreme Court granting the petition.

NATHANIEL FOXWORTHY GREENE, BPR NO. 033318
DAVIDSON COUNTY

By Order of the Tennessee Supreme Court entered May 11, 2026, the law license of Nathaniel Foxworthy Greene, was transferred to disability inactive status pursuant to Section 27.3 of Tennessee Supreme Court Rule 9.

Mr. Greene cannot practice law while on disability inactive status and shall comply with the requirements of Tennessee Supreme Court Rule 9, Section 28, regarding the obligations and responsibilities of attorneys transferred to disability inactive status. In accordance with Tennessee Supreme Court Rule 9, Section 27.7, Mr. Greene may return to the practice of law upon entry of an order by the Tennessee Supreme Court reinstating his license to active status.

RICHARD LAMAR DUGGER, BPR NO. 006605
BEDFORD COUNTY

By Order of the Tennessee Supreme Court entered May 19, 2026, the law license of Richard Lamar Dugger, was transferred to disability inactive status pursuant to Section 27.4 of Tennessee Supreme Court Rule 9.

Mr. Dugger cannot practice law while on disability inactive status and shall comply with the requirements of Tennessee Supreme Court Rule 9, Section 28, regarding the obligations and responsibilities of attorneys transferred to disability inactive status. In accordance with Tennessee Supreme Court Rule 9, Section 27.7, Mr. Dugger may return to the practice of law upon entry of an order by the Tennessee Supreme Court reinstating his license to active status.

HARVEY RANDOLPH FALLIN, BPR NO. 015127
TENNESSEE

By Order of the Tennessee Supreme Court entered June 3, 2026, the law license of attorney Harvey Randolph Fallin, a resident of Tallahassee, Florida, was transferred to disability inactive status pursuant to Section 27.4 of Tennessee Supreme Court Rule 9.

Mr. Fallin cannot practice law while on disability inactive status and shall comply with the requirements of Tennessee Supreme Court Rule 9, Section 28, regarding the obligations and responsibilities of attorneys transferred to disability inactive status. Mr. Fallin may return to the active practice of law by filing a petition in accordance with Tennessee Supreme Court Rule 9, Section 27.7 and the entry of an order by the Tennessee Supreme Court granting the petition.

ADRIANNE GRIMM THOMPSON, BPR NO. 031836
DAVIDSON COUNTY

By Order of the Tennessee Supreme Court entered June 10, 2026, the law license of attorney Adrianne Grimm Thompson was transferred to disability inactive status pursuant to Section 27.3 of Tennessee Supreme Court Rule 9.

Ms. Thompson cannot practice law while on disability inactive status and shall comply with the requirements of Tennessee Supreme Court Rule 9, Section 28, regarding the obligations and responsibilities of attorneys transferred to disability inactive status. Ms. Thompson may return to the active practice of law by filing a petition in accordance with Tennessee Supreme Court Rule 9, Section 27.7 and the entry of an order by the Tennessee Supreme Court granting the petition.

PATRICIA SUE MCGUIRE, BPR NO. 003226
LAWRENCE COUNTY

By Order of the Tennessee Supreme Court entered August 17, 2026, the law license of attorney Patricia Sue McGuire was transferred to disability inactive status pursuant to Section 27.1 of Tennessee Supreme Court Rule 9.

Ms. McGuire cannot practice law while on disability inactive status and shall comply with the requirements of Tennessee Supreme Court Rule 9, Section 28, regarding the obligations and responsibilities of attorneys transferred to disability inactive status. Ms. McGuire may return to the active practice of law by filing a petition in accordance with Tennessee Supreme Court Rule 9, Section 27.7 and the entry of an order by the Tennessee Supreme Court granting the petition.

CARROLL ALEXANDRIA NAIL, BPR NO. 040750
PUTNAM COUNTY

By Order of the Tennessee Supreme Court entered August 28, 2026, the law license of attorney Carroll Alexandria Nail was transferred to disability inactive status pursuant to Section 27.3 of Tennessee Supreme Court Rule 9.

Ms. Nail cannot practice law while on disability inactive status and shall comply with the requirements of Tennessee Supreme Court Rule 9, Section 28, regarding the obligations and responsibilities of attorneys transferred to disability inactive status. Ms. Nail may return to the active practice of law by filing a petition in accordance with Tennessee Supreme Court Rule 9, Section 27.7 and the entry of an order by the Tennessee Supreme Court granting the petition.

TENNESSEE LAWYERS' FUND
for CLIENT PROTECTION

Tennessee Lawyer's Fund Payments

CHRISTOPHER SHAWN ROBERTS BPR NO. 033510
ROANE COUNTY

On October 7, 2025, the Tennessee Lawyers' Fund for Client Protection (Lawyers' Fund) paid a claim filed against Christopher Shawn Roberts, in the amount of $2,040.78.

Lawyers' Fund, financed by Tennessee lawyers and judges, was established by the Tennessee Supreme Court to reimburse individuals for losses caused by the rare instances of dishonest conduct by attorneys. The Tennessee Supreme Court appoints a Lawyers' Fund Board, consisting of six lawyers and three non-attorney members, who serve without compensation in considering and paying claims pursuant to Tennessee Supreme Court Rule 25.

Mr. Roberts is required to reimburse Lawyers' Fund for the amount paid to any claimant pursuant to Tennessee Supreme Court Rule 25 Section 16 and/or the Order of Enforcement entered by the Supreme Court of Tennessee.

FRANCIS ZAVIER SANTORE, JR. BPR NO. 011315
GREENE COUNTY

On December 2, 2025, the Tennessee Lawyers' Fund for Client Protection (Lawyers' Fund) paid a claim filed against Francis Xavier Santore Jr., in the amount of $5,000.00.

Lawyers' Fund, financed by Tennessee lawyers and judges, was established by the Tennessee Supreme Court to reimburse individuals for losses caused by the rare instances of dishonest conduct by attorneys. The Tennessee Supreme Court appoints a Lawyers' Fund Board, consisting of six lawyers and three non-attorney members, who serve without compensation in considering and paying claims pursuant to Tennessee Supreme Court Rule 25.

Mr. Santore is required to reimburse Lawyers' Fund for the amount paid to any claimant pursuant to Tennessee Supreme Court Rule 25 Section 16 and/or the Order of Enforcement entered by the Supreme Court of Tennessee.

DARREN VINCENT BERG BPR NO. 011315
KNOX COUNTY

On June 9, 2026, the Tennessee Lawyers' Fund for Client Protection (Lawyers' Fund) paid a claim filed against Darren Vincent Berg, in the amount of $35,000.00.

Lawyers' Fund, financed by Tennessee lawyers and judges, was established by the Tennessee Supreme Court to reimburse individuals for losses caused by the rare instances of dishonest conduct by attorneys. The Tennessee Supreme Court appoints a Lawyers' Fund Board, consisting of six lawyers and three non-attorney members, who serve without compensation in considering and paying claims pursuant to Tennessee Supreme Court Rule 25.

Mr. Berg is required to reimburse Lawyers' Fund for the amount paid to any claimant pursuant to Tennessee Supreme Court Rule 25 Section 16 and/or the Order of Enforcement entered by the Supreme Court of Tennessee.

FRANCIS ZAVIER SANTORE, JR. BPR NO. 011315
GREENE COUNTY

On June 9, 2026, the Tennessee Lawyers' Fund for Client Protection (Lawyers' Fund) paid a claim filed against Francis Xavier Santore Jr., in the amount of $32,600.00.

Lawyers' Fund, financed by Tennessee lawyers and judges, was established by the Tennessee Supreme Court to reimburse individuals for losses caused by the rare instances of dishonest conduct by attorneys. The Tennessee Supreme Court appoints a Lawyers' Fund Board, consisting of six lawyers and three non-attorney members, who serve without compensation in considering and paying claims pursuant to Tennessee Supreme Court Rule 25.

Mr. Santore is required to reimburse Lawyers' Fund for the amount paid to any claimant pursuant to Tennessee Supreme Court Rule 25 Section 16 and/or the Order of Enforcement entered by the Supreme Court of Tennessee.

DAVID STEELE EWING BPR NO. 016673
DAVIDSON COUNTY

On June 9, 2026, the Tennessee Lawyers' Fund for Client Protection (Lawyers' Fund) paid a claim filed against David Steele Ewing, in the amount of $100,000.00.

Lawyers' Fund, financed by Tennessee lawyers and judges, was established by the Tennessee Supreme Court to reimburse individuals for losses caused by the rare instances of dishonest conduct by attorneys. The Tennessee Supreme Court appoints a Lawyers' Fund Board, consisting of six lawyers and three non-attorney

members, who serve without compensation in considering and paying claims pursuant to Tennessee Supreme Court Rule 25.

Mr. Ewing is required to reimburse Lawyers' Fund for the amount paid to any claimant pursuant to Tennessee Supreme Court Rule 25 Section 16 and/or the Order of Enforcement entered by the Supreme Court of Tennessee.

MARGARET JANE POWERS BPR NO. 007328
CUMBERLAND COUNTY

On June 30, 2026, the Tennessee Lawyers' Fund for Client Protection (Lawyers' Fund) paid a claim filed against Margaret Jane Powers, in the amount of $1,633.00.

Lawyers' Fund, financed by Tennessee lawyers and judges, was established by the Tennessee Supreme Court to reimburse individuals for losses caused by the rare instances of dishonest conduct by attorneys. The Tennessee Supreme Court appoints a Lawyers' Fund Board, consisting of six lawyers and three non-attorney members, who serve without compensation in considering and paying claims pursuant to Tennessee Supreme Court Rule 25.

Ms. Powers is required to reimburse Lawyers' Fund for the amount paid to any claimant pursuant to Tennessee Supreme Court Rule 25 Section 16 and/or the Order of Enforcement entered by the Supreme Court of Tennessee.

ERIC JOHN MONTIERTH BPR NO. 007328
ROANE COUNTY

On June 30, 2026, the Tennessee Lawyers' Fund for Client Protection (Lawyers' Fund) paid a claim filed against Eric John Montierth, in the amount of $6,500.00.

Lawyers' Fund, financed by Tennessee lawyers and judges, was established by the Tennessee Supreme Court to reimburse individuals for losses caused by the rare instances of dishonest conduct by attorneys. The Tennessee Supreme Court appoints a Lawyers' Fund Board, consisting of six lawyers and three non-attorney members, who serve without compensation in considering and paying claims pursuant to Tennessee Supreme Court Rule 25.

Mr. Montierth is required to reimburse Lawyers' Fund for the amount paid to any claimant pursuant to Tennessee Supreme Court Rule 25 Section 16 and/or the Order of Enforcement entered by the Supreme Court of Tennessee.

MARCUS ALLEN LIPHAM BPR NO. 007328
MADISON COUNTY

On June 30, 2026, the Tennessee Lawyers' Fund for Client Protection (Lawyers' Fund) paid a claim filed against Marcus Allen Lipham, in the amount of $3,500.00.

Lawyers' Fund, financed by Tennessee lawyers and judges, was established by the Tennessee Supreme Court to reimburse individuals for losses caused by the rare instances of dishonest conduct by attorneys. The Tennessee Supreme Court appoints a Lawyers' Fund Board, consisting of six lawyers and three non-attorney members, who serve without compensation in considering and paying claims pursuant to Tennessee Supreme Court Rule 25.

Mr. Lipham is required to reimburse Lawyers' Fund for the amount paid to any claimant pursuant to Tennessee Supreme Court Rule 25 Section 16 and/or the Order of Enforcement entered by the Supreme Court of Tennessee.

DARREN VINCENT BERG BPR NO. 023505
KNOX COUNTY

On June 30, 2026, the Tennessee Lawyers' Fund for Client Protection (Lawyers' Fund) paid a claim filed against Darren Vincent Berg, in the amount of $30,000.00.

Lawyers' Fund, financed by Tennessee lawyers and judges, was established by the Tennessee Supreme Court to reimburse individuals for losses caused by the rare instances of dishonest conduct by attorneys. The Tennessee Supreme Court appoints a Lawyers' Fund Board, consisting of six lawyers and three non-attorney members, who serve without compensation in considering and paying claims pursuant to Tennessee Supreme Court Rule 25.

Mr. Berg is required to reimburse Lawyers' Fund for the amount paid to any claimant pursuant to Tennessee Supreme Court Rule 25 Section 16 and/or the Order of Enforcement entered by the Supreme Court of Tennessee.

MARCUS ALLEN LIPHAM BPR NO. 007328
MADISON COUNTY

On June 30, 2026, the Tennessee Lawyers' Fund for Client Protection (Lawyers' Fund) paid a claim filed against Marcus Allen Lipham, in the amount of $2,500.00.

Lawyers' Fund, financed by Tennessee lawyers and judges, was established by the Tennessee Supreme Court to reimburse individuals for losses caused by the rare instances of dishonest conduct by attorneys. The Tennessee Supreme Court appoints a Lawyers' Fund Board, consisting of six lawyers and three non-attorney members, who serve without compensation in considering and paying claims pursuant to Tennessee Supreme

Court Rule 25.
Mr. Lipham is required to reimburse Lawyers' Fund for the amount paid to any claimant pursuant to Tennessee Supreme Court Rule 25 Section 16 and/or the Order of Enforcement entered by the Supreme Court of Tennessee.

MARCUS ALLEN LIPHAM BPR NO. 007328
MADISON COUNTY

On September 15, 2026, the Tennessee Lawyers' Fund for Client Protection (Lawyers' Fund) paid a claim filed against Marcus Allen Lipham, in the amount of $5,500.00.
Lawyers' Fund, financed by Tennessee lawyers and judges, was established by the Tennessee Supreme Court to reimburse individuals for losses caused by the rare instances of dishonest conduct by attorneys. The Tennessee Supreme Court appoints a Lawyers' Fund Board, consisting of six lawyers and three non-attorney members, who serve without compensation in considering and paying claims pursuant to Tennessee Supreme Court Rule 25.
Mr. Lipham is required to reimburse Lawyers' Fund for the amount paid to any claimant pursuant to Tennessee Supreme Court Rule 25 Section 16 and/or the Order of Enforcement entered by the Supreme Court of Tennessee.

MARCUS ALLEN LIPHAM BPR NO. 007328
MADISON COUNTY

On September 15, 2026, the Tennessee Lawyers' Fund for Client Protection (Lawyers' Fund) paid a claim filed against Marcus Allen Lipham, in the amount of $3,500.00.
Lawyers' Fund, financed by Tennessee lawyers and judges, was established by the Tennessee Supreme Court to reimburse individuals for losses caused by the rare instances of dishonest conduct by attorneys. The Tennessee Supreme Court appoints a Lawyers' Fund Board, consisting of six lawyers and three non-attorney members, who serve without compensation in considering and paying claims pursuant to Tennessee Supreme Court Rule 25.
Mr. Lipham is required to reimburse Lawyers' Fund for the amount paid to any claimant pursuant to Tennessee Supreme Court Rule 25 Section 16 and/or the Order of Enforcement entered by the Supreme Court of Tennessee.

AMANDA HOWELL CASTILLO BPR NO. 037519
MAURY COUNTY

On September 15, 2026, the Tennessee Lawyers' Fund for Client Protection (Lawyers' Fund) paid a claim filed against Amanda Howell Castillo, in the amount of $1,500.00.

Lawyers' Fund, financed by Tennessee lawyers and judges, was established by the Tennessee Supreme Court to reimburse individuals for losses caused by the rare instances of dishonest conduct by attorneys. The Tennessee Supreme Court appoints a Lawyers' Fund Board, consisting of six lawyers and three non-attorney members, who serve without compensation in considering and paying claims pursuant to Tennessee Supreme Court Rule 25.

Ms. Castillo is required to reimburse Lawyers' Fund for the amount paid to any claimant pursuant to Tennessee Supreme Court Rule 25 Section 16 and/or the Order of Enforcement entered by the Supreme Court of Tennessee.

MICHAEL LLOYD FREEMAN BPR NO. 028698
DAVIDSON COUNTY

On September 15, 2026, the Tennessee Lawyers' Fund for Client Protection (Lawyers' Fund) paid a claim filed against Michael Lloyd Freeman, in the amount of $828.29.

Lawyers' Fund, financed by Tennessee lawyers and judges, was established by the Tennessee Supreme Court to reimburse individuals for losses caused by the rare instances of dishonest conduct by attorneys. The Tennessee Supreme Court appoints a Lawyers' Fund Board, consisting of six lawyers and three non-attorney members, who serve without compensation in considering and paying claims pursuant to Tennessee Supreme Court Rule 25.

Mr. Freeman is required to reimburse Lawyers' Fund for the amount paid to any claimant pursuant to Tennessee Supreme Court Rule 25 Section 16 and/or the Order of Enforcement entered by the Supreme Court of Tennessee.

AGNES SIPPLE TRUJILLO BPR NO. 025229
JEFFERSON COUNTY

On September 15, 2026, the Tennessee Lawyers' Fund for Client Protection (Lawyers' Fund) paid a claim filed against Agnes Sipple Trujillo, in the amount of $7,500.00.

Lawyers' Fund, financed by Tennessee lawyers and judges, was established by the Tennessee Supreme Court to reimburse individuals for losses caused by the rare instances of dishonest conduct by attorneys. The Tennessee Supreme Court appoints a Lawyers' Fund Board, consisting of six lawyers and three non-attorney members, who serve without compensation in considering and paying claims pursuant to Tennessee Supreme

Court Rule 25.

Ms. Trujillo is required to reimburse Lawyers' Fund for the amount paid to any claimant pursuant to Tennessee Supreme Court Rule 25 Section 16 and/or the Order of Enforcement entered by the Supreme Court of Tennessee.

JAMES NATHAN HARGIS BPR NO. 035171
PUTNAM COUNTY

On September 15, 2026, the Tennessee Lawyers' Fund for Client Protection (Lawyers' Fund) paid a claim filed against James Nathan Hargis, in the amount of $100,000.00.

Lawyers' Fund, financed by Tennessee lawyers and judges, was established by the Tennessee Supreme Court to reimburse individuals for losses caused by the rare instances of dishonest conduct by attorneys. The Tennessee Supreme Court appoints a Lawyers' Fund Board, consisting of six lawyers and three non-attorney members, who serve without compensation in considering and paying claims pursuant to Tennessee Supreme Court Rule 25.

Mr. Hargis is required to reimburse Lawyers' Fund for the amount paid to any claimant pursuant to Tennessee Supreme Court Rule 25 Section 16 and/or the Order of Enforcement entered by the Supreme Court of Tennessee.