



# Washington Discipline System 2023 Annual Report

WASHINGTON STATE  
BAR ASSOCIATION



# Washington Discipline System 2023 Annual Report

## EDITORIAL STAFF

**Rachel Agent**, Disciplinary Program and Systems Manager

**Rhianna Eley**, Disciplinary Program and Systems Admin



## WASHINGTON STATE BAR ASSOCIATION

1325 4th Avenue, Suite 600

Seattle, WA 98101-2539

206-727-8207

[www.wsba.org](http://www.wsba.org)

# Contents

<b>Executive Summary</b>	<b>1</b>
<b>The Lawyer Discipline System</b>	<b>4</b>
Structure of the Lawyer Discipline System . . . . .	4
The Office of Disciplinary Counsel . . . . .	5
Review Committees of the Disciplinary Board . . . . .	5
Hearing Officers. . . . .	6
Disciplinary Board . . . . .	6
Washington Supreme Court. . . . .	7
2023 by the Numbers. . . . .	8
<b>Lawyer Grievance and Other ODC Statistics</b>	<b>9</b>
Disciplinary Grievance Statistics . . . . .	9
Diversion . . . . .	13
Auditor Activities . . . . .	13
<b>Lawyer Hearings and Appeals</b>	<b>14</b>
Review Committees. . . . .	14
Hearing Officers . . . . .	14
Disciplinary Board . . . . .	15
Washington Supreme Court . . . . .	15
<b>Final Outcomes in Lawyer Discipline Cases</b>	<b>16</b>
Disciplinary Actions . . . . .	16
Ethics Rules Violations . . . . .	18
<b>Lawyers Disciplined</b>	<b>20</b>
<b>Other Components of the Discipline System</b>	<b>21</b>
Adjunct Disciplinary Counsel Panel. . . . .	21
Probation and Other Conditions of Discipline. . . . .	22
Lawyer Disability Matters. . . . .	22
Client Protection Fund . . . . .	23
Funding the Lawyer Discipline System. . . . .	24
<b>LPO and LLLT Discipline System</b>	<b>25</b>
Statistical Information . . . . .	26

## Executive Summary

*The Washington State Bar Association (WSBA, or the Bar) is pleased to present the 2023 Discipline System Annual Report.<sup>1</sup> This report is published to share publicly available information about the operations of Washington’s lawyer and limited license practitioner discipline system.*

**T**he Washington Supreme Court has exclusive governmental responsibility over the discipline system, many aspects of which are delegated by court rule to be administered by the WSBA. Consistent with the Supreme Court’s mandate in [General Rule \(GR\) 12.2](#), the WSBA administers an effective system of discipline to fulfill its obligations to protect the public and ensure the integrity of the profession. The WSBA’s lawyer discipline functions are discharged primarily by the WSBA’s Office of Disciplinary Counsel (ODC), the WSBA’s Office of General Counsel (OGC), the Disciplinary Board, and Washington Supreme Court-appointed hearing officers. The WSBA discipline functions for limited licenses to practice law are discharged by ODC and the WSBA’s Regulatory Services Department (RSD), each license’s respective Supreme Court regulatory board, OGC, and Washington Supreme Court-appointed hearing officers.

---

1 For purposes of this report, references to “the discipline system” encompass both the discipline and disability systems.

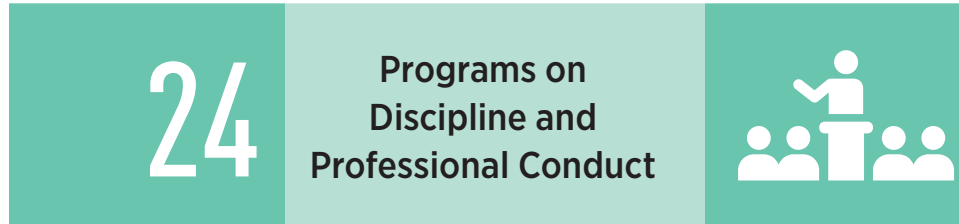
Key components include:

- Reviewing and investigating allegations of ethical misconduct and incapacity.
- Prosecuting violations of the applicable ethical rules.
- Seeking and approving the transfer of practitioners to disability inactive status.
- Addressing less serious matters with diversion.
- Informing the public about licensed legal professionals, the legal system, and means to address difficulties involving lawyers and other licensed legal professionals.
- Informally resolving non-communication issues and file disputes (disputes regarding clients requesting their files).
- Administering a random examination program to assess trust account compliance and to educate practitioners on the proper handling of client funds held in trust.
- Administering the Client Protection Fund.
- Educating practitioners about the discipline system and their ethical responsibilities.
- Participating in the development and improvement of the law of ethics and discipline.

*This report summarizes the WSBA's efforts in these areas and highlights accomplishments from the 2023 calendar year.*



In 2023, ODC lawyers and auditors appeared as speakers in twenty-four programs around the state, at national conferences, and in webinars and webcasts, educating lawyers, law students, and legal professionals.



Program topics included:

- Trust Account Recordkeeping and Compliance
- The Discipline System
- Leadership Principles
- Handling Challenges to Reciprocal Discipline
- Intake Practices and Procedures
- Career Changes for Lawyers
- Litigation Skills

---

### The WSBA Professional Responsibility Program

The WSBA Professional Responsibility Program—which is distinct from and independent of the discipline system—also provides ethics education and outreach to practitioners. In fiscal year 2023, the Ethics Line staff provided advice to 1900 callers. There were 37 programs around the state and nationally, including live, webinar and webcast events.



# The Lawyer Discipline System

The Washington discipline system for lawyers is composed of several entities that operate as part of the judicial branch of government under the authority of the Washington Supreme Court. The lawyer discipline system is administered by the WSBA, which operates the investigative and prosecutorial functions separately from the adjudicative functions. ODC oversees the investigative and prosecutorial functions. OGC provides administrative and legal support to the hearing officers and the Disciplinary Board, which carry out the adjudicative and decision-making functions. OGC further manages the records for disciplinary proceedings. See [LPO and LLLT Discipline System](#) later in this Report for details about the discipline system for limited license legal professionals.

## STRUCTURE OF THE LAWYER DISCIPLINE SYSTEM

### WSBA Office of Disciplinary Counsel

- Answers public inquiries and informally resolves disputes.
- Receives, reviews, and may investigate grievances.
- Recommends disciplinary action or dismissal.
- Diverts grievances involving less serious misconduct.
- Recommends disability proceedings.
- Presents cases to discipline-system adjudicators.

### Hearing Officers

- Conduct evidentiary hearings and other proceedings.
- Conduct settlement conferences.
- Approve stipulations to admonition and reprimand.

### Disciplinary Board

- Reviews recommendations for proceedings and disputed dismissals.
- Serves as intermediate appellate body.
- Reviews hearing records and stipulations.

### Washington Supreme Court

- Exclusive governmental responsibility for the system.
- Conducts final appellate review.
- Orders sanctions, interim suspensions, and reciprocal discipline.

## *The Office of Disciplinary Counsel*

---

ODC is responsible for reviewing, investigating, and prosecuting grievances about the ethical conduct of Washington lawyers and allegations of incapacity to practice law.

ODC has an intake team, a team of legal administrative assistants, three investigation/prosecution teams, a team of investigators, a team of paralegals, and a team of auditors. The intake team receives inquiries and written grievances and conducts the first review of grievances against lawyers. Some grievances are dismissed at the intake stage, while others are referred for further investigation by ODC investigation/prosecution staff, which includes disciplinary counsel, investigators, paralegals, and administrative assistants. After investigation, disciplinary counsel determine whether grievances should be dismissed or reported to a review committee of the Disciplinary Board. Some less serious matters are diverted from discipline. Rule 6.2 of the Rules for Enforcement of Lawyer Conduct (ELC) sets forth criteria for determining what conduct may qualify as “less serious misconduct.”

Disciplinary counsel prosecute matters ordered to hearing by a review committee of the Disciplinary Board. If a hearing-level decision is appealed, disciplinary counsel brief and argue the appeal to the Disciplinary Board and, in some cases, the Supreme Court.

## *Review Committees of the Disciplinary Board*

---

### **Administered by OGC**

Four review committees, each composed of two lawyer members and one community representative member of the Disciplinary Board, serve an oversight function in the lawyer discipline system, first to consider grievant appeals of disciplinary counsel dismissals, and second to consider disciplinary counsel recommendations for admonitions or public disciplinary hearings. Among other actions, a review committee may dismiss a matter, order further investigation, issue an admonition, or order a hearing. Review committees also have authority to order a hearing regarding a lawyer’s alleged incapacity to practice law. The WSBA’s OGC provides staff for legal and administrative support to the four review committees.



## *Hearing Officers*

---

### **Administered by OGC**

Volunteer hearing officers preside over hearings for disciplinary and disability cases. They receive evidence and issue findings, conclusions, and a recommendation on the discipline to be imposed, if any. Hearing officers also conduct settlement conferences in many discipline cases. In disability proceedings, hearing officers make recommendations regarding whether a respondent lawyer should be transferred to disability inactive status. They are also authorized to resolve cases by approving stipulations to reprimand, admonition, or dismissal. A Chief Hearing Officer supervises the hearing officers, assigns cases, assists with training, and monitors hearing officer performance. The WSBA's OGC provides staff for legal and administrative support to hearing officers.

## *Disciplinary Board*

---

### **Administered by OGC**

In addition to its review committee functions, the Disciplinary Board, composed of volunteer lawyers and community representatives, considers appeals of hearing officer decisions. The Disciplinary Board reviews the record when a respondent lawyer or disciplinary counsel has filed an appeal of the hearing officer's recommendation in a disciplinary matter. The Board also reviews appeals of lawyer disability cases and may review suspension and disbarment recommendations. If requested, the Board hears oral argument on the cases much like an appellate court, and then issues its decision. The Board also reviews stipulations submitted by the parties, which, if approved, will resolve the proceeding without a hearing. The WSBA's OGC provides staff for legal and administrative support to the Disciplinary Board in the performance of its adjudicative functions.









## ***Washington Supreme Court***

---

The Washington Supreme Court has inherent and plenary authority to regulate the practice of law, including the power to dispose of individual cases of lawyer discipline. All proceeding resolutions are sent to the Court, except for dismissals. The Court reviews the Disciplinary Board's suspension and disbarment recommendations, which are appealable as a matter of right. The Court also considers petitions for discretionary review of other adjudicated dispositions. Disciplinary and disability cases appealed to the Supreme Court, like other Supreme Court appeals, proceed with briefing and oral argument, followed by a written opinion by the Court. The Supreme Court may order reciprocal discipline of lawyers who have been disciplined in other jurisdictions, and order interim suspension of a lawyer if the Disciplinary Board recommended disbarment or if the lawyer was convicted of a crime, poses a risk of serious harm to the public, fails to cooperate with a disciplinary investigation, or asserts the lawyer's own incapacity to defend against a disciplinary proceeding.



## 2023 BY THE NUMBERS

40,771	Licensed Lawyers	
33,661 7,110	Currently Active	
	Pro Bono, Honorary, or Inactive	
1,759	Grievance Files Opened	
69	Disciplinary and Disability Proceedings Opened	
27	Public Formal Complaints Filed	
5	Disciplinary Hearings	
47	Disciplinary Actions Imposed	

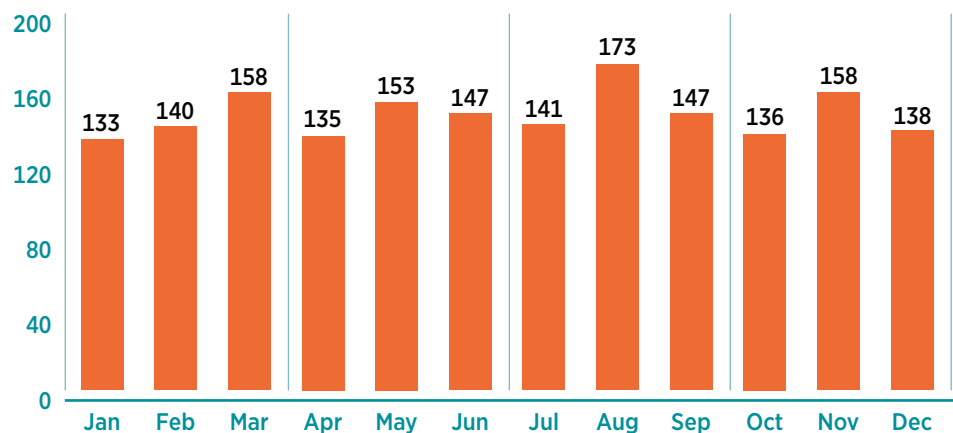
# Lawyer Grievance and Other ODC Statistics

## DISCIPLINARY GRIEVANCE STATISTICS

The following statistics relate to the intake, investigation, and prosecution by ODC of grievances against lawyers in the 2023 calendar year.

Disciplinary Grievances, Informally Resolved Matters, and Public Inquiries	2023
Disciplinary Grievances Opened	1,759
Disciplinary Grievances Resolved <sup>2</sup>	1,795
Non-Communication Matters Informally Resolved	117
File Disputes Informally Resolved	43
Public Inquiries, Phone Calls, and Emails	3,557

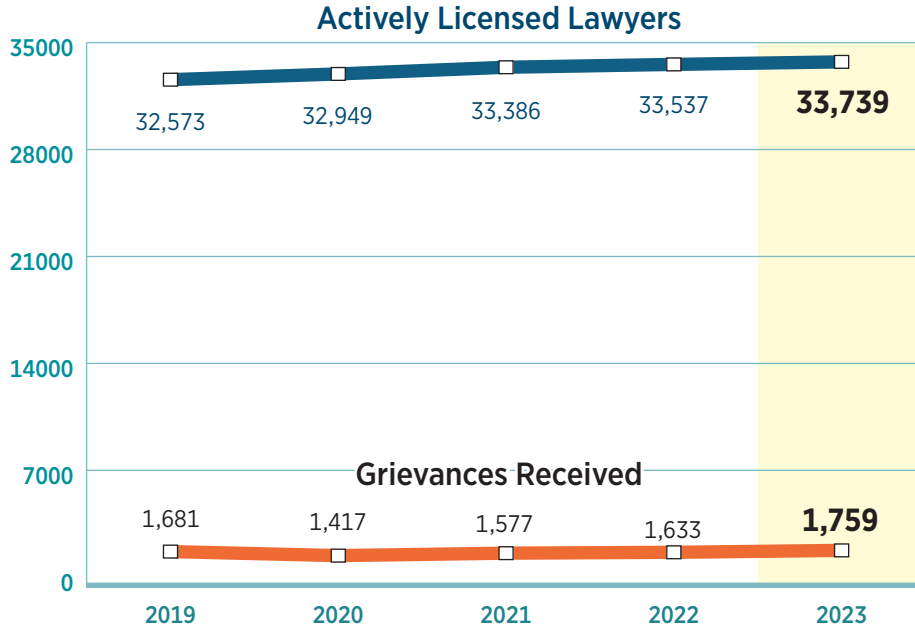
## Number of Grievances Opened – 2023



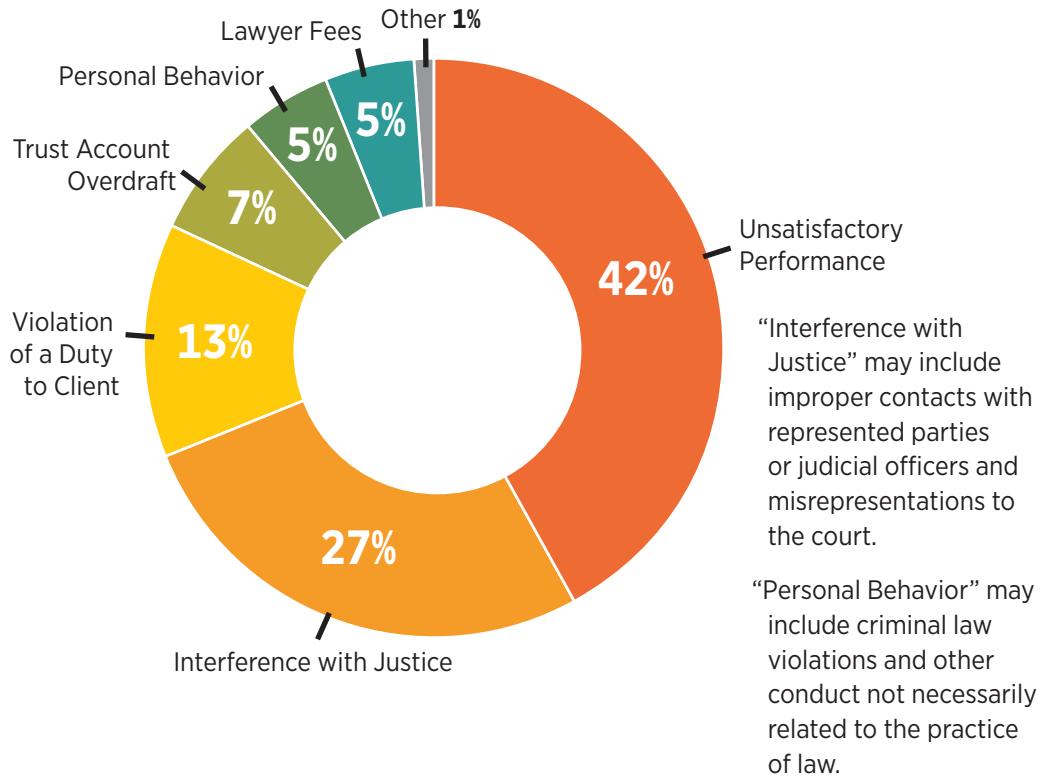
<sup>2</sup> “Grievances resolved” include all grievances that closed during the calendar year, including, but not limited to, grievances that were dismissed in intake or after investigation and those for which disciplinary action was imposed.



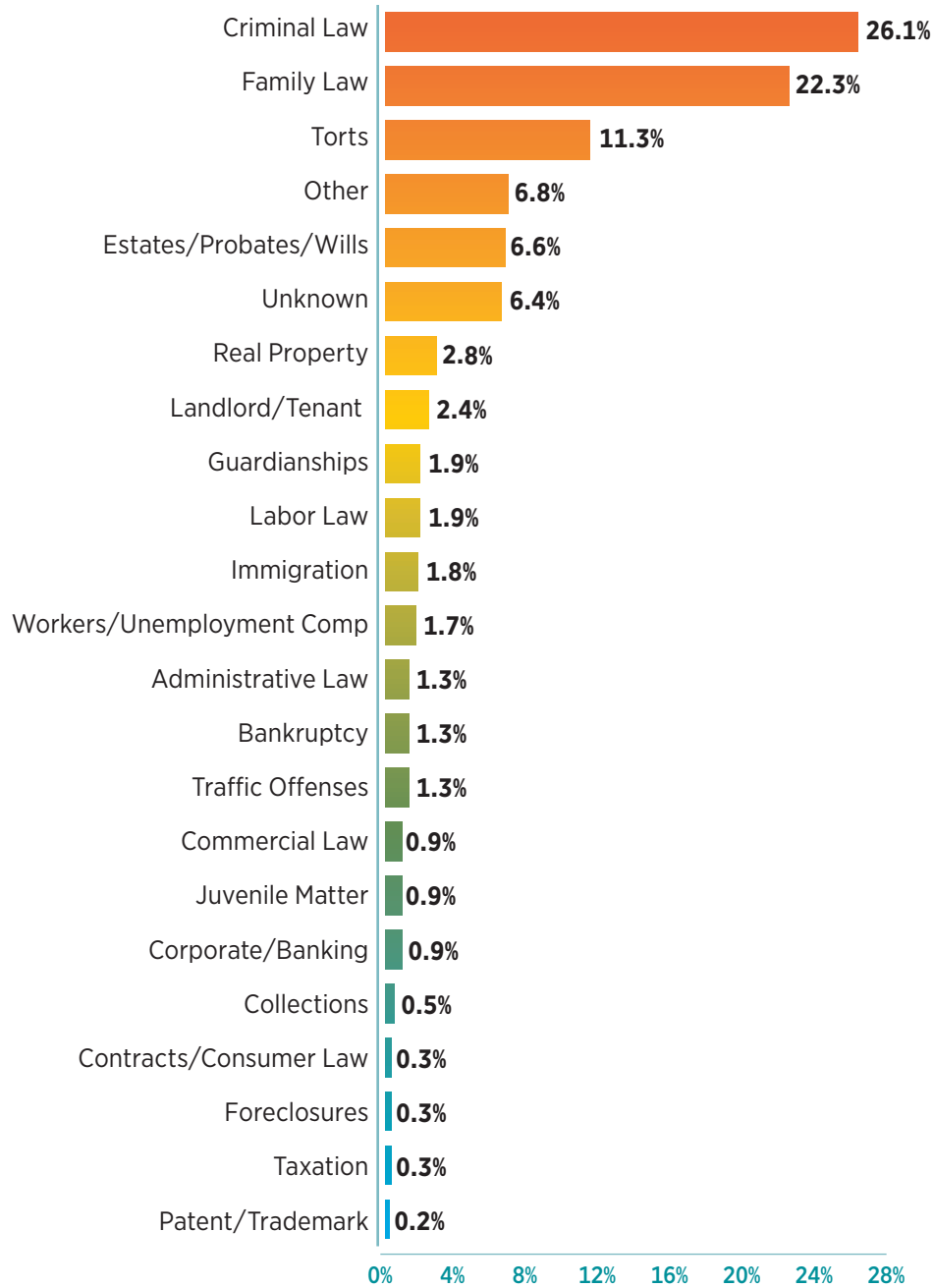
### Grievances Received in Relation to Number of Actively Licensed Lawyers 2019 – 2023



### Nature of Grievances – 2023



## Grievances by Practice Area – 2023

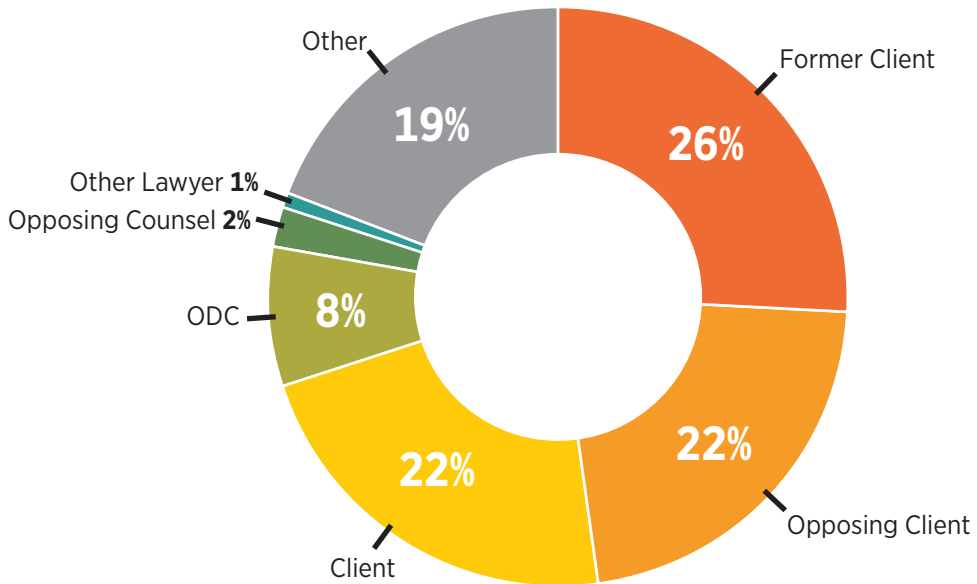


“Unknown” captures those grievances where there was too little information to determine a practice area.

“Other” reflects those practice areas that arise infrequently.



## Sources of Grievances Filed – 2023



“ODC” includes files opened in the name of ODC when potential ethical misconduct comes to the attention of disciplinary counsel by means other than the submission of a grievance (e.g. news articles, notices of criminal conviction, trust account overdrafts, etc.) or through confidential sources.

“Other” may include grievances filed by family members, neighbors, non-client members of the public, or other individuals.

## DIVERSION

For less serious misconduct, ODC may divert a grievance from discipline if the lawyer agrees to a diversion contract. A successfully completed diversion results in dismissal of the grievance. If the lawyer fails to complete the diversion contract, the grievance is reinstated and may result in public disciplinary action.<sup>3</sup>

Diversions	2021	2022	2023
New Diversions	16	12	14
Completed Diversions	19	17	10
Failed to Complete Contract	0	1	0

## AUDITOR ACTIVITIES

Washington lawyers who maintain client trust accounts must hold those accounts with financial institutions that report any overdraft of funds to the WSBA. Auditors in ODC assist in the investigation and resolution of grievances opened because of overdraft notices. Auditors also assist in the investigation of grievance files involving trust account issues, conduct random examinations of lawyer trust accounts to ensure compliance with the ethics rules, and review trust account records for lawyers on disciplinary probation.

Auditor Activities	2021	2022	2023
New Overdraft Files	77	66	74
Overdraft Files Closed	89	78	57
Investigation File Assignments	21	12	16
Random Examinations <sup>4</sup>	0	0	0
Re-examinations	0	0	0

<sup>3</sup> Total completed diversions include diversions entered into in the prior reporting year but completed in the reporting year.

<sup>4</sup> Due to an ongoing staffing shortage, no new files were opened in 2021-2023.



# Lawyer Hearings and Appeals

## REVIEW COMMITTEES

In 2023, the review committees of the Disciplinary Board met 15 times to consider 400 matters, including review of dismissals; admonition, advisory letter, and hearing recommendations; and other requests, e.g., deferrals of investigation, orders for costs, and other non-routine matters.

Review Committee Decisions	2021	2022	2023
Dismissals	189	315	302
Orders to Hearing	35	44	61
Other (Deferrals, Costs, etc.)	7	10	19
More Investigation	10	18	10
Advisory Letters	1	9	8
Admonitions	0	0	0

## HEARING OFFICERS

In fiscal year 2023,<sup>5</sup> 23 volunteer lawyers appointed by the Washington Supreme Court served as hearing officers.

Hearing Officer Work	2021	2022	2023
Hearings Held	7	9	5
Stipulations Approved	11	7	8
Settlement Conferences Held	8	9	13

<sup>5</sup> The WSBA's fiscal year is October 1 through September 30.

## DISCIPLINARY BOARD

The Disciplinary Board considered 20 disciplinary and disability matters (excluding denials of *sua sponte* review) and ordered the transfer of three lawyers to disability inactive status.

Disciplinary Board Matters	2021	2022	2023
Cases Reviewed by Appeal	0	1	4
Stipulations Considered	14	9	13
Oral Arguments	0	1	3

## WASHINGTON SUPREME COURT

The Supreme Court reciprocally disciplined 15 lawyers and suspended seven lawyers on an interim basis.

Supreme Court Decisions	2021	2022	2023
Interim Suspensions	4	12	7
Reciprocal Discipline	4	12	15
Oral Arguments	1	0	0
Published Opinions	1	0	0

# Final Outcomes in Lawyer Discipline Cases

## DISCIPLINARY ACTIONS

---

**D**isciplinary “actions,” which include both disciplinary sanctions and admonitions, result in a permanent public disciplinary record. In order of increasing severity, disciplinary actions are admonitions, reprimands, suspensions, and disbarments. A suspension from the practice of law may be for any period of time not to exceed three years<sup>6</sup>, and may include conditions to be fulfilled by the lawyer before reinstatement. A disbarment revokes the lawyer’s license to practice law. Disbarred lawyers are precluded from seeking readmission to the Bar for five years after disbarment. Only the Washington Supreme Court may order suspension, disbarment, or reinstatement.

Lawyers may also resign in lieu of discipline if they do not wish to defend against allegations of misconduct. A lawyer who resigns in lieu of discipline may not seek reinstatement to the practice of law in Washington.

Review committees of the Disciplinary Board also have authority to issue an advisory letter when it is determined that a lawyer should be cautioned. Advisory letters are neither a sanction nor a disciplinary action and are not public information.

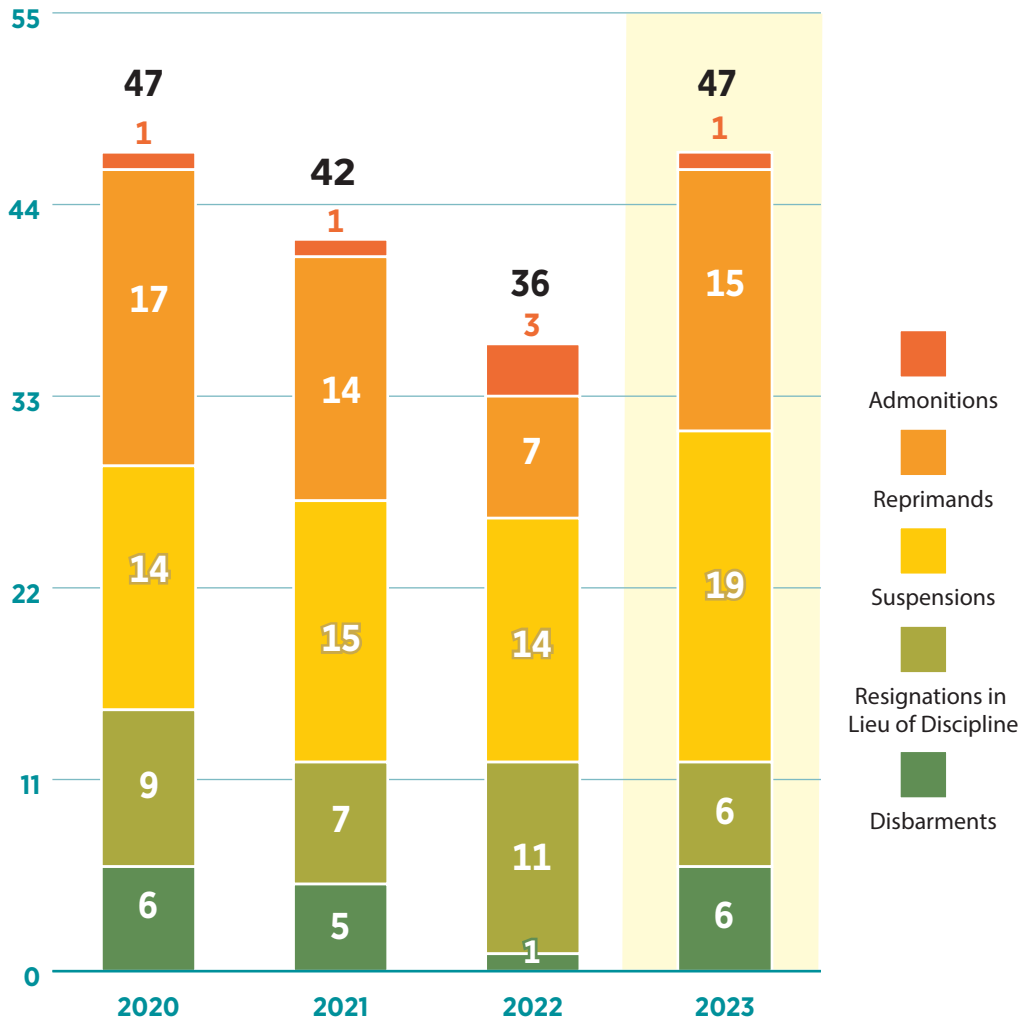
---

<sup>6</sup> Reciprocal suspensions may exceed three years to align with the discipline imposed in the originating jurisdiction.



In 2023, 42 lawyers were disciplined and five lawyers had more than one disciplinary action, for a total of 47 disciplinary actions. The following chart reports the number of disciplinary actions imposed over the last four calendar years.

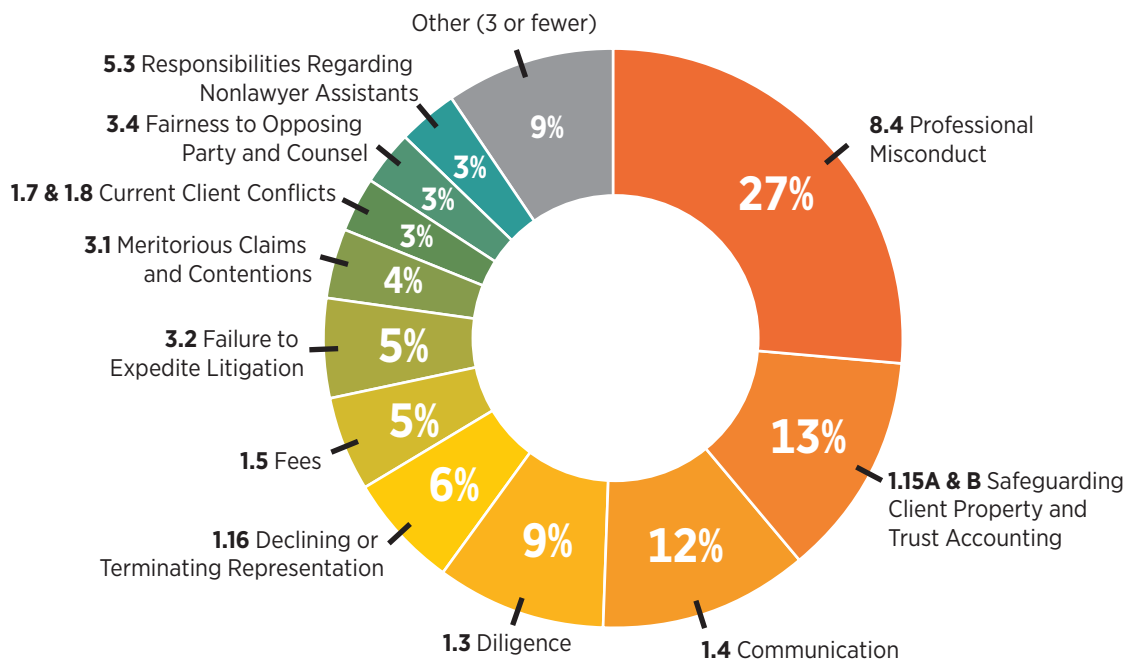
### Disciplinary Actions 2020 – 2023



## ETHICS RULES VIOLATIONS

In 2023, the most common rule violations in disciplinary proceedings were related to professional misconduct (RPC 8.4)<sup>7</sup>, safeguarding client property and trust accounting (RPC 1.15A, 1.15B), communication (RPC 1.4), and diligence (RPC 1.3). The following charts detail the RPC violations found in 2023 by group percentage and by individual count.<sup>8 9</sup> To review these and other RPC, visit the Washington Supreme Court's website at [www.courts.wa.gov](http://www.courts.wa.gov).

### Ethics Rules Violations – 2023 by Group Percentage

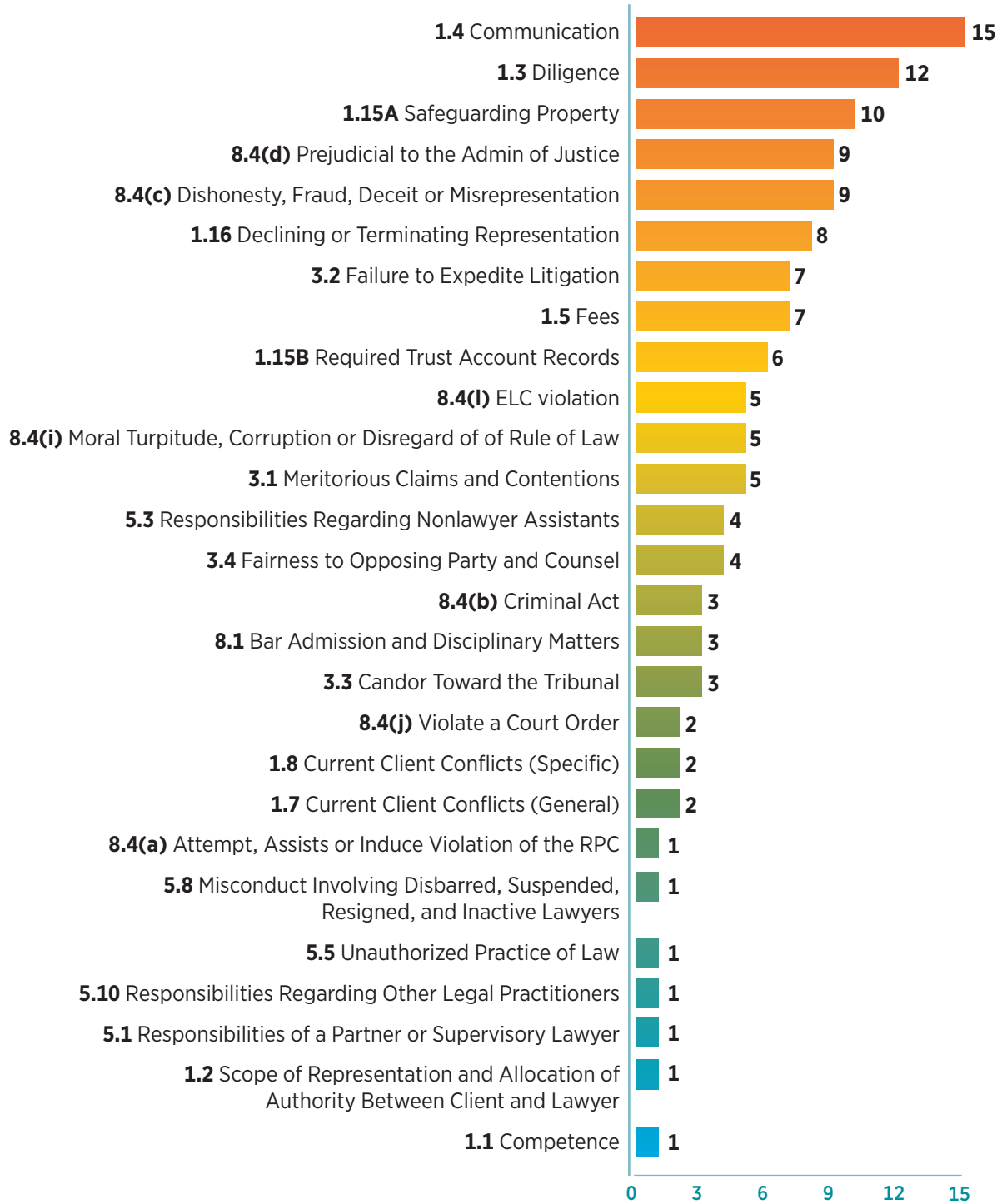


<sup>7</sup> RPC 8.4 violations may include, among other misconduct, criminal conduct, dishonesty, and conduct prejudicial to the administration of justice.

<sup>8</sup> The Ethics Rules Violations graph does not reflect multiple repeat rule violations in the same proceeding. Additionally, the chart does not reflect reciprocal discipline matters, as the applicable ethics rules vary among jurisdictions.

<sup>9</sup> "Other" reflects those RPC that individually amounted to less than 3% of the RPC violations found.

### Ethics Rules Violations – 2023 by Count





# Lawyers Disciplined

## DISBARMENTS (6)

- Fay, Nicholas A. – #47603
- Hanson, Maribeth Mae – #48474
- Haynes, Robin Lynn – #38116
- Jinhong, Dominique Louise Eng – #28293
- Kahr, Helga – #16338
- White, Richard Forrest – #19531

## RESIGNATIONS IN LIEU OF DISCIPLINE (6)

- Blondin, Andra Ruth – #28268
- Cross, Geoffrey Colburn – #3089
- Homsher, Frank Shigaihis – #26935
- Lipscomb, Jacob D. – #42977
- Parks, Arthur Colby – #22508
- Peick, John C. – #6249

## SUSPENSIONS (19)

- Dalton, Drew D. – #39306
- Du Wors, John David – #33987
- Han, Zhihua Josh – #46204
- Hartl, Colleen A. – #18051
- Hartl, Colleen A. – #18051\*
- Heckeke, Mark Walter – #55903
- Hendry, James T. – #37411
- Holady, Mark John – #19662
- Jones, Richard Llewelyn – #12904
- Leahy, Brice Carolyn – #48353
- Merdes, Ward M. – #20375
- Pidgeon, Stephen W. – #25265
- Polovina, Tarik – #52816
- Potter, Mark William – #23757
- Simon, Terry Hood – #15409
- Solodky, Brian M. – #36540
- Spencer, Merwin Moe – #40963
- Vance, Julie A. – #32189
- Yug, Elliott D. – #25254

## REPRIMANDS (15)

- Brouillard, Robert Patrick – #19786
- Brumley, Josh – #49851
- Brumley, Josh – #49851\*
- Everett, Jonathan Jubal – #43792
- Gilbert, Russell Harold – #24968
- Goldstein, Ari Rothman – #45993
- Hale, Leila Louisa – #47247
- Hale, Leila Louisa – #47247\*
- Hoxie, Christopher Michael – #46293
- Schneider, Jaye Lynn – #13515
- Siegal, Brooks Richard – #50766
- Slinde, Nicholas J. – #35316
- Sykes, Tuella O. – #36179
- Sykes, Tuella O. – #36179\*
- Yug, Elliott D. – #25254

## ADMONITIONS (1)

- MaGee, James Henry – #23434

\*Multiple sanctions were ordered.

For more information, please visit [wsba.org](http://wsba.org) or our webpage on [Professional Discipline](#).

## Other Components of the Discipline System

### ADJUNCT DISCIPLINARY COUNSEL PANEL

The Adjunct Disciplinary Counsel (ADC) Panel is established by Rule 2.9 of the Washington Supreme Court's Rules for Enforcement of Lawyer Conduct (ELC). Under ELC 5.3(c), disciplinary counsel may assign a grievance to an ADC for investigation under the supervision of the Office of Disciplinary Counsel. In addition, members of the ADC Panel may be called upon to serve as volunteers in the discipline system in a variety of other capacities, such as:

- Assisting disciplinary counsel with a portion of an investigation by reviewing court files, interviewing witnesses, or analyzing evidence.
- Serving as Special Disciplinary Counsel/Adjunct Trial Counsel to represent the WSBA in the prosecution of a disciplinary case.
- Providing disciplinary counsel with an opinion on an area of law relevant to a disciplinary hearing or investigation.
- Providing disciplinary counsel with advice on an aspect of a pending disciplinary proceeding.
- Serving as a probation monitor following imposition of a disciplinary sanction.
- Serving as a file custodian when a lawyer dies, disappears, or otherwise becomes incapable of protecting client interests.

In 2023, the ADC Panel consisted of 32 volunteer lawyer members, who assisted ODC in 16 investigations, one disciplinary proceeding, and six disciplinary related probations.

Learn more about the Adjunct Disciplinary Counsel Panel on our [website](#).

## PROBATION AND OTHER CONDITIONS OF DISCIPLINE

Sanctioned or admonished lawyers may be placed on probation for a fixed time period. Conditions of probation may include alcohol and drug treatment, medical care, psychiatric care, office practice or management counseling, and periodic audits. Other conditions of discipline may include paying restitution to victims and paying the costs of the disciplinary proceeding. A suspension order may also impose conditions that must be complied with prior to reinstatement.

File Openings: Probations and Other Conditions	2021	2022	2023
Probation	15	12	16
Restitution	6	6	10
Costs	32	33	34

## LAWYER DISABILITY MATTERS

Special procedures apply when there is reasonable cause to believe that a lawyer is incapable of properly defending a disciplinary proceeding or is incapable of practicing law due to a mental or physical incapacity. Such matters are handled under a distinct set of procedural rules. In some cases, the lawyer must have counsel appointed at the WSBA's expense. In these cases, a determination that the lawyer does not have the capacity to practice law results in a transfer to disability inactive status. It is also possible for a lawyer to stipulate to a transfer to disability inactive status, and a transfer is required following judicial determination of a lawyer's incapacity, such as involuntary commitment. Although disciplinary procedural rules under the ELC govern disability proceedings, the proceedings are not disciplinary in nature.

Transfers to Disability Inactive	2021	2022	2023
Total	5	4	3



## CLIENT PROTECTION FUND

### Administered by OGC

The Client Protection Fund Board was established to promote public confidence in the administration of justice and the integrity of the legal profession. Its purpose is to relieve or mitigate a financial loss sustained by a client resulting from a WSBA member's dishonesty or failure to account for money or property entrusted to the WSBA member. The dishonesty or failure to account must have been in connection with the member's practice of law or role as a fiduciary in a matter related to the member's practice of law. To finance the Fund, WSBA lawyers on active status, lawyers with *pro hac vice* admissions, house counsel, foreign law consultants, and limited license legal technicians (LLLTs) on active status pay an annual assessment imposed by order of the Washington Supreme Court. In 2023, the Fund gave over \$342,000 in gifts.

Client Protection Fund <sup>10</sup>	2021	2022	2023
Member Assessment	\$25	\$20	<b>\$20</b>
Number of Requests Granted	29	33	<b>42</b>
Of These, Number of Lawyers Involved	18	13	<b>14</b>
Total Gifts	\$491,737	\$587,815	<b>\$342,424</b>

<sup>10</sup> The [Client Protection Board](#) reports on the WSBA fiscal year, which is October 1 to September 30.

## FUNDING THE LAWYER DISCIPLINE SYSTEM

License fees fund the lawyer discipline system—there is no public funding.<sup>11</sup>

Discipline System Revenue and Expenses <sup>12</sup>	2021	2022	2023
<b>Revenue</b>			
Recovery of Discipline Costs	\$107,513	\$85,405	<b>\$51,271</b>
Discipline History Summaries	\$19,087	\$19,433	<b>\$17,969</b>
Misc <sup>13</sup>	\$1,275	\$893	<b>\$850</b>
<b>Total Revenue</b>	<b>\$127,875</b>	<b>\$105,731</b>	<b>\$70,090</b>
<b>Expenses</b>			
Investigation/ Prosecution	\$5,703,554	\$5,743,648	<b>\$5,683,853</b>
Disciplinary Board Expenses	\$211,410	\$225,893	<b>\$260,801</b>
Hearing Officer Expenses	\$30,000	\$32,763	<b>\$30,891</b>
<b>Total Expenses</b>	<b>\$5,944,964</b>	<b>\$6,002,304</b>	<b>\$5,975,545</b>
<b>Net Total Expenses</b>	<b>\$5,817,089</b>	<b>\$5,896,573</b>	<b>\$5,905,455</b>

11 Approximately two percent of the discipline system revenue is funded from alternative revenue sources, including recovery of discipline costs, issuance of discipline history certificates, and recovery of revenue for auditor review of trust account records.

12 Lawyer discipline system expenses are based on the WSBA fiscal year.

13 Miscellaneous revenue includes audit revenue.

## LPO and LLLT Discipline System

Limited practice officers (LPOs) and limited license legal technicians (LLLTs) are also licensed to practice law by the Washington Supreme Court through regulatory systems administered by the WSBA.<sup>14</sup> LPOs may select, prepare, and complete forms for use in a loan, extension of credit, sale, or other transfer of real or personal property. See [Admission and Practice Rule \(APR\) 12](#) for more information about the LPO license. LLLTs are licensed to provide limited legal assistance to clients in family law matters. See [Admission and Practice Rule \(APR\) 28](#) for more information about the LLLT scope of practice.

A Washington Supreme Court-mandated regulatory board oversees each limited license: the Limited Practice Board for LPOs and the Limited License Legal Technician Board for LLLTs. Each licensee is subject to license-specific rules of professional conduct and disciplinary procedural rules. The WSBA administers a discipline system for these licenses.

The key differences between the lawyer discipline system and the limited license discipline systems are as follows:

- (1) Each regulatory board acts as the intermediate appellate body, akin to the Disciplinary Board, to review hearing records and stipulations.
- (2) A discipline committee of each regulatory board serves the function of a review committee.
- (3) RSD staff and the chair of each discipline committee conduct initial review of grievances and make intake decisions.

For both licenses, possible disciplinary actions include revocation, voluntary cancellation in lieu of revocation, suspension, reprimand, and admonition.

---

<sup>14</sup> On June 4, 2020, the Washington Supreme Court decided to sunset the Limited License Legal Technician program, and on June 9, 2022, the Court extended the deadline for LLLT applicants to complete the preadmission requirements to July 31, 2023. Further information is available on our [website](#).



## STATISTICAL INFORMATION

LPO Disciplinary Statistics	2021	2022	2023
Number of Active Licensees	802	793	731
Disciplinary Grievances Received	3	10	7
Disciplinary Grievances Resolved	2	7	7
Matters Diverted	0	0	0
Disciplinary Actions Imposed	0	1	0

LLLT Disciplinary Statistics	2021	2022	2023
Number of Active Licensees	66	76	81
Disciplinary Grievances Received	3	4	5
Disciplinary Grievances Resolved	1	3	5
Matters Diverted	0	0	0
Disciplinary Actions Imposed	0	0	0

