

WASHINGTON STATE
BAR ASSOCIATION

Washington Discipline System 2024 Annual Report



WASHINGTON STATE BAR ASSOCIATION

1325 Fourth Avenue, Suite 600, Seattle, WA 98101-2539

206.727.8207 | www.wsba.org

Washington Discipline System 2024 Annual Report

EDITORIAL STAFF

Rachel Agent, Disciplinary Program and Systems Manager

Rhianna Eley, Disciplinary Program and Systems Admin



WASHINGTON STATE BAR ASSOCIATION

1325 Fourth Avenue, Suite 600, Seattle, WA 98101-2539

206.727.8207 | www.wsba.org

Contents

Executive Summary	1
The Lawyer Discipline System	3
Structure of the Lawyer Discipline System	3
The Office of Disciplinary Counsel.....	3
Review Committees of the Disciplinary Board.....	4
Hearing Officers	4
Disciplinary Board	4
Washington Supreme Court.....	5
2024 by the Numbers	5
Lawyer Grievance and Other ODC Statistics	6
Disciplinary Grievance Statistics	6
Diversion	9
Auditor Activities.....	9
Lawyer Hearings and Appeals	10
Review Committees	10
Hearing Officers	10
Disciplinary Board	11
Washington Supreme Court.....	11
Final Outcomes in Lawyer Discipline Cases	12
Disciplinary Actions	12
Ethics Rules Violations	13
Lawyers Disciplined	15
Other Components of the Discipline System	16
Adjunct Disciplinary Counsel Panel	16
Probation and Other Conditions of Discipline.....	16
Lawyer Disability Matters	17
Client Protection Fund.....	17
Funding the Lawyer Discipline System.....	18
Updates to the Discipline and Disability Case System and Document Management Software	18
LPO and LLLT Discipline System	19
Statistical Information.....	19

Executive Summary

The Washington State Bar Association (WSBA, or the Bar) is pleased to present the 2024 Discipline System Annual Report.¹ This report is published to share publicly available information about the operations of Washington's lawyer and limited license practitioner discipline system.

The 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.

This report summarizes the WSBA's efforts in these areas and highlights accomplishments from the 2024 calendar year.

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 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; and
- > **Participating** in the development and improvement of the law of ethics and discipline.

CONTINUED >

In 2024, ODC lawyers and auditors appeared as speakers in seventeen programs around the state, at national conferences, and in webinars and webcasts, educating lawyers, law students, and legal professionals.

PROGRAM TOPICS INCLUDED:

- > confidentiality and transparency in lawyer discipline;
- > intake practices and procedures;
- > indigent defense standards and legal ethics;
- > the ethics of witness preparation;
- > and litigation skills.

A key highlight for 2024 was the implementation of a new internal case and document management software system. *Details can be found in the [Other Components of the Discipline System](#) section of this report.*

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 2024, the Ethics Line staff provided advice to 1900 callers and engaged in 40 education programs around the state and nationally, including live, webinar, and webcast events.



2024 > BY THE NUMBERS



17

Programs on
Discipline and
Professional
Conduct



1,900

Calls Providing
Ethics Advice



40

Ethics Education
Programs

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.

The Office of Disciplinary Counsel (ODC)

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,

STRUCTURE OF THE LAWYER DISCIPLINE SYSTEM



WSBA Office of Disciplinary Counsel (ODC)

- > 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 (Administered by OGC)

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



Disciplinary Board (Administered by OGC)

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



Washington Supreme Court

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

CONTINUED >

CONTINUED >

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 when they are 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 staff provides 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 staff provides 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 staff provides legal and administrative support to the Disciplinary Board in the performance of its adjudicative functions.

CONTINUED >

CONTINUED >



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.



2024 > BY THE NUMBERS



40,967

Total Licensed Lawyers



33,830

Actively Licensed Lawyers



7,137

Other Licensed Lawyers*



1,822

Grievance Files Opened



29

Public Formal Complaints Filed



53

Disciplinary (47) and Disability Proceedings (6) Opened

7

Interim Suspension Disciplinary (4) and Disability (3) Proceedings Opened



8

Disciplinary Hearings



51

Disciplinary Actions Imposed



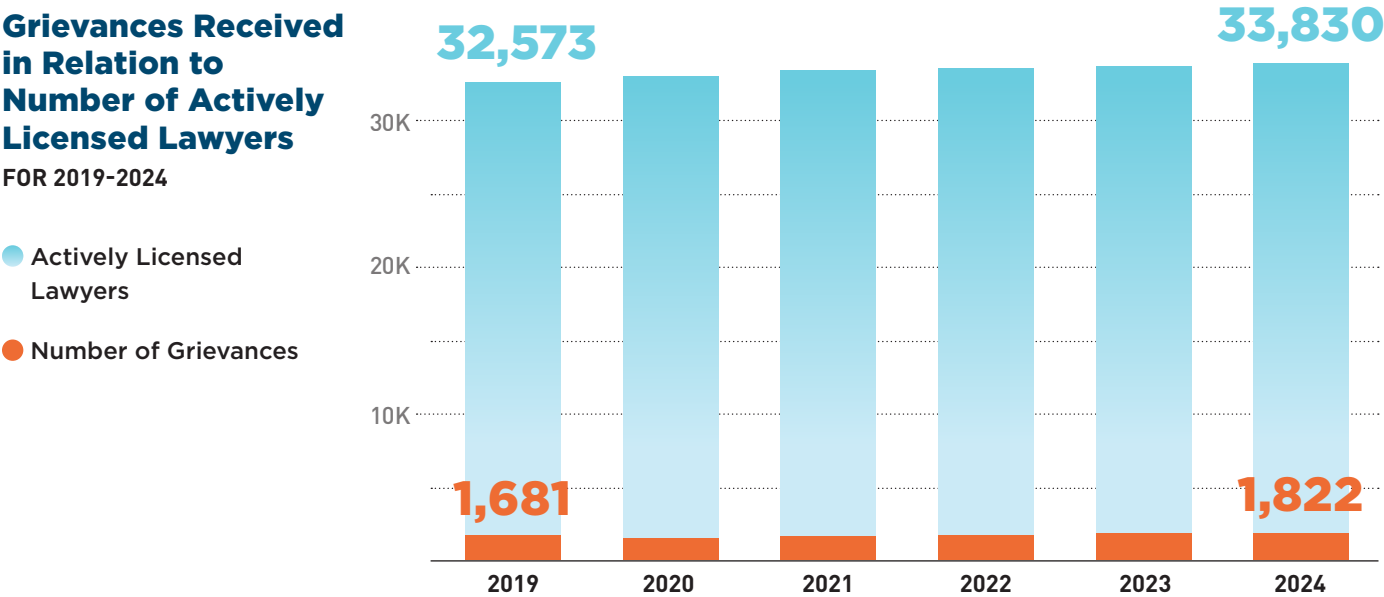
3

Supreme Court Opinions

* Honorary, Inactive, Pro Bono, and Judicial

Lawyer Grievance and Other ODC Statistics

The following statistics relate to the intake, investigation, and prosecution by the ODC of grievances against lawyers in the 2024 calendar year.



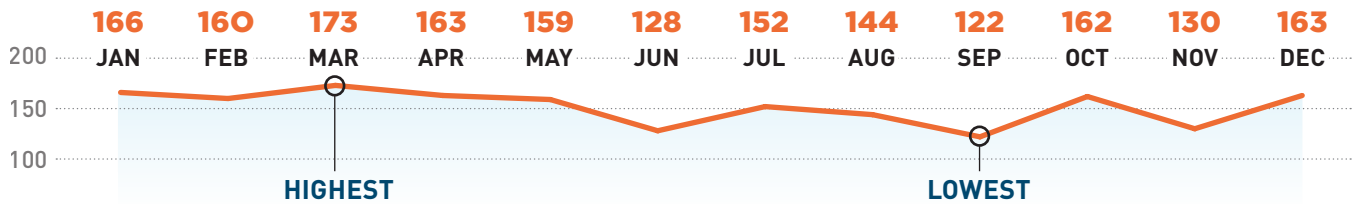
STATISTICAL INFORMATION				
GRIEVANCE DATA & MORE		2022	2023	2024
Disciplinary Grievances Opened		1,633	1,759	1,822
Disciplinary Grievances Resolved ²		1,634	1,795	1,802
Non-Communication Matters Informally Resolved		97	117	95
File Disputes Informally Resolved		44	43	49
Public Inquiries, Phone Calls, and Emails*		1,568	1,827	2,300

*Excluding disciplinary history certificates and discipline checks previously reported in 2022 and 2023.

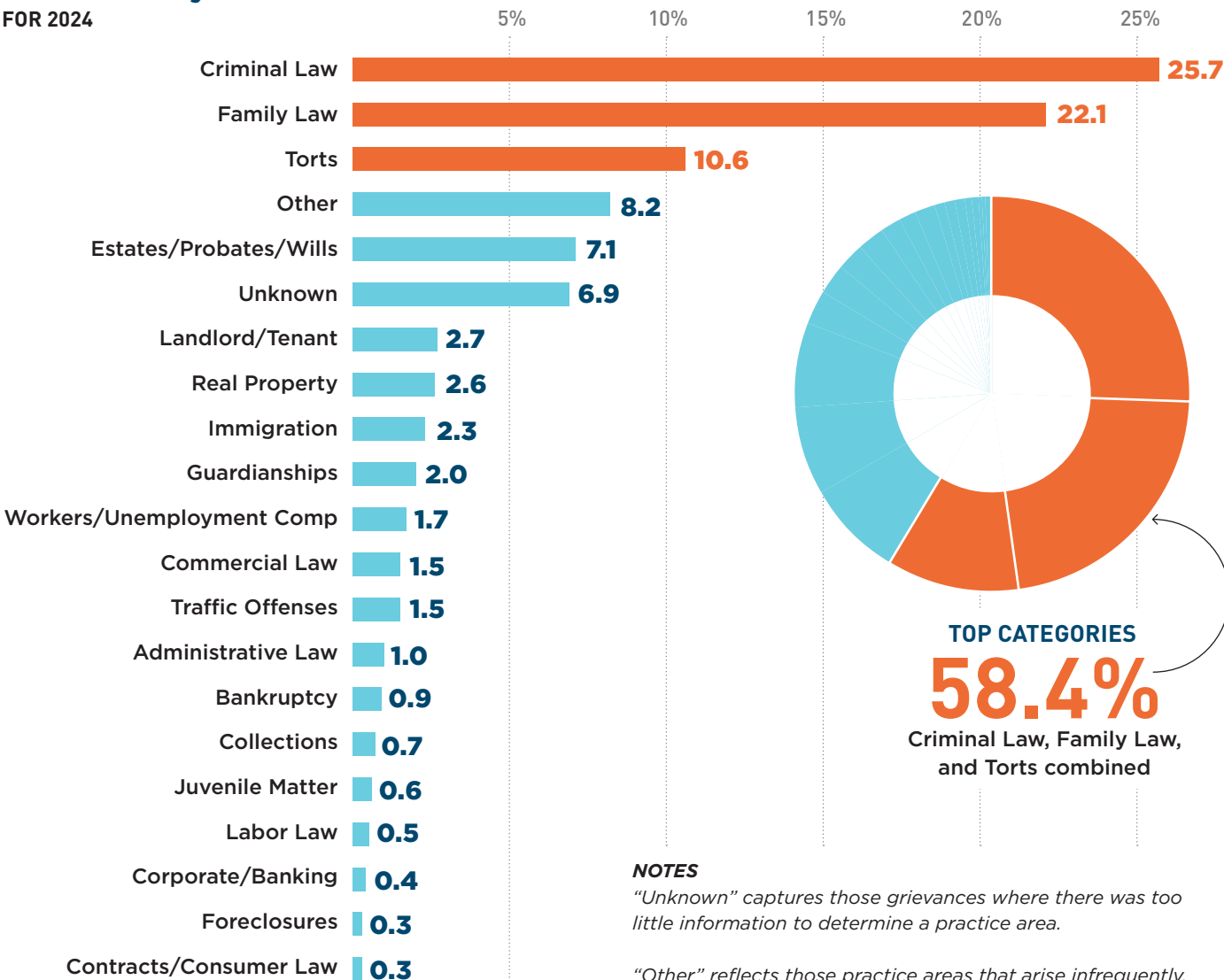
2. "Grievances resolved" include all grievances that closed during the calendar year, including, but not limited to, grievances that were dismissed in intake or after investigation and those for which disciplinary action was imposed.

CONTINUED >

Number of Grievances Opened – By Month
FOR 2024

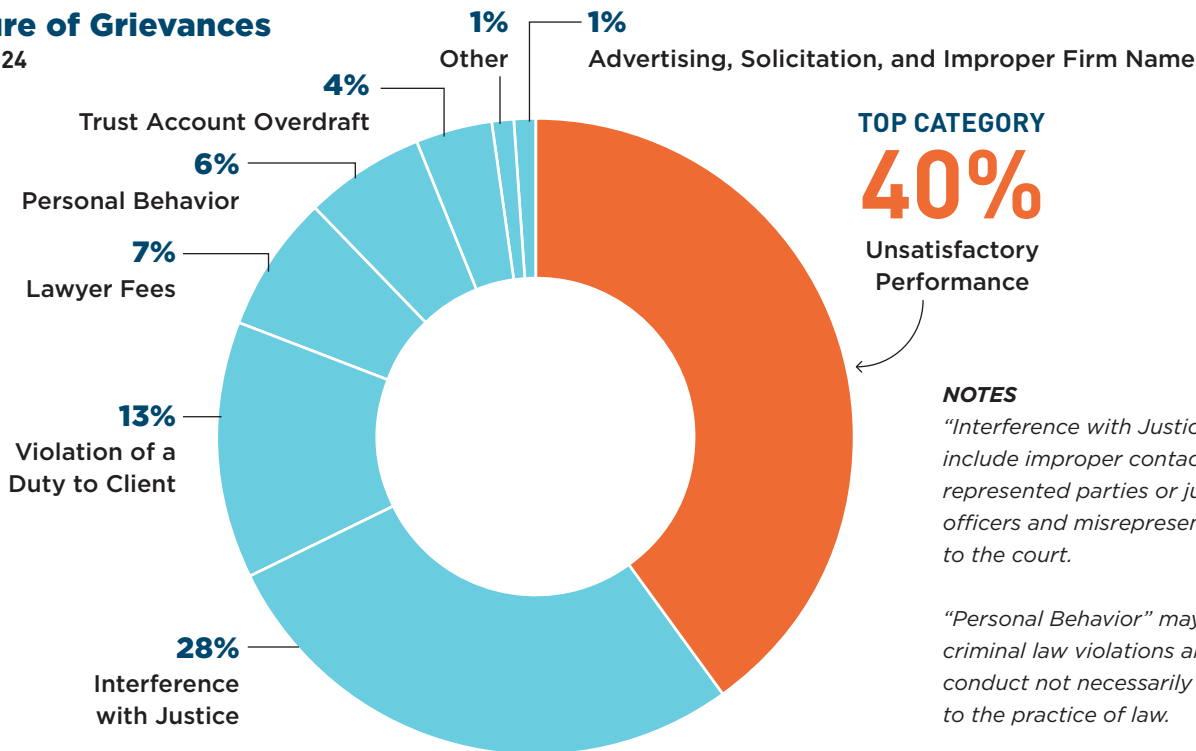


Grievances by Practice Area
FOR 2024

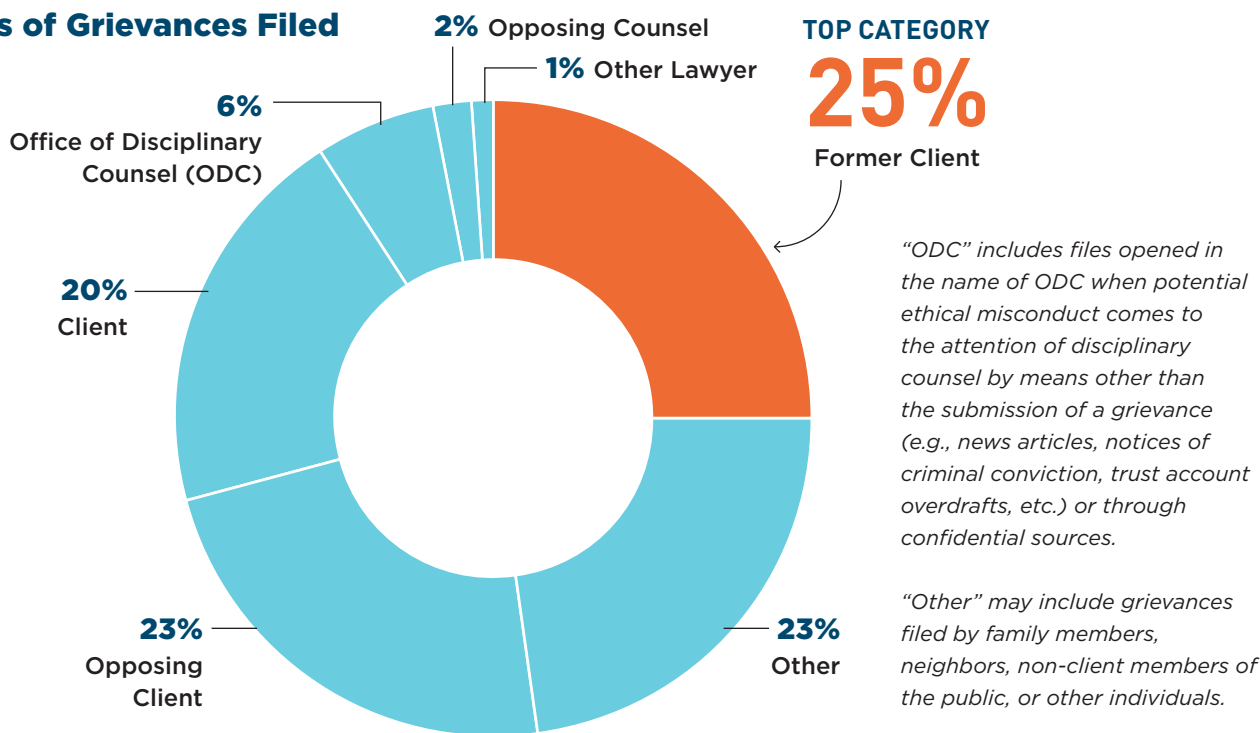


CONTINUED >

Nature of Grievances
FOR 2024



Sources of Grievances Filed
FOR 2024



CONTINUED >

Diversions

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.³

	2022	2023	2024
New Diversions	12	14	9
Completed Diversions	17	10	16
Failed to Complete Contract	1	0	2

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 grievances 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.

	2022	2023	2024
New Overdraft Files	66	74	42
Overdraft Files Closed	78	57	53
Investigation File Assignments	12	16	7
Random Examinations ⁴	0	0	20
Re-examinations	0	0	0

3. Total completed diversions include diversions entered into in the prior reporting year but completed in the reporting year.

4. Due to a staffing shortage, no new files were opened in 2021-2023.

Lawyer Hearings and Appeals

Year-over-year statistics for Review Committees, Hearing Officers, Disciplinary Board and Washington Supreme Court.



Review Committees

In 2024, the review committees of the Disciplinary Board met 17 times to consider 453 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.

	2022	2023	2024
Dismissals	315	302	371
Orders to Hearing	44	61	40
Other (Deferrals, Costs, etc.)	10	19	23
More Investigation	18	10	15
Advisory Letters	9	8	4
Admonitions	0	0	0



Hearing Officers

In fiscal year 2024,⁵ 20 volunteer lawyers appointed by the Washington Supreme Court served as hearing officers.

	2022	2023	2024
Hearings Held	9	5	8
Stipulations Approved	7	8	8 ⁶
Settlement Conferences Held	9	13	10

5. The WSBA's fiscal year is October 1 through September 30.

6. One order involved a Limited Practice Officer.

CONTINUED >



Disciplinary Board

The Disciplinary Board considered 33 disciplinary and disability matters (excluding denials of *sua sponte* review) and ordered the transfer of five lawyers to disability inactive status.

	2022	2023	2024
Cases Reviewed by Appeal	1	4	1
Stipulations Considered	9	13	26
Oral Arguments	1	3	1



Washington Supreme Court

The Supreme Court reciprocally disciplined 13 lawyers and suspended seven lawyers on an interim basis.

	2022	2023	2024
Interim Suspensions	12	7	7
Reciprocal Discipline	12	15	13
Oral Arguments	0	0	3
Published Opinions	0	0	3 ⁷

7. Two opinions resulted in imposition of disciplinary sanctions and the third was a remand for further proceedings.

Final Outcomes in Lawyer Discipline Cases

Disciplinary “actions,” which include both disciplinary sanctions and admonitions, result in a permanent public disciplinary record.

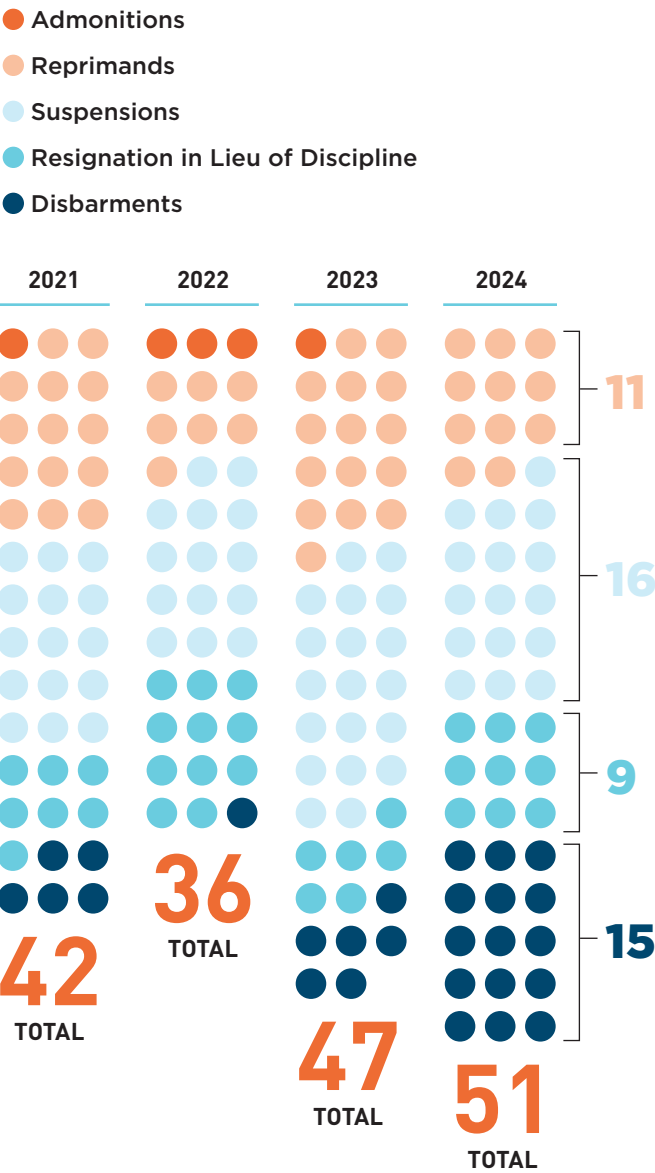
In order of increasing severity, disciplinary actions are admonitions, reprimands, suspensions, and disbarments. A suspension from the practice of law may be for any period of time not to exceed three years,⁸ and may include conditions to be fulfilled by the lawyer before reinstatement. A disbarment 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.

Disciplinary Actions

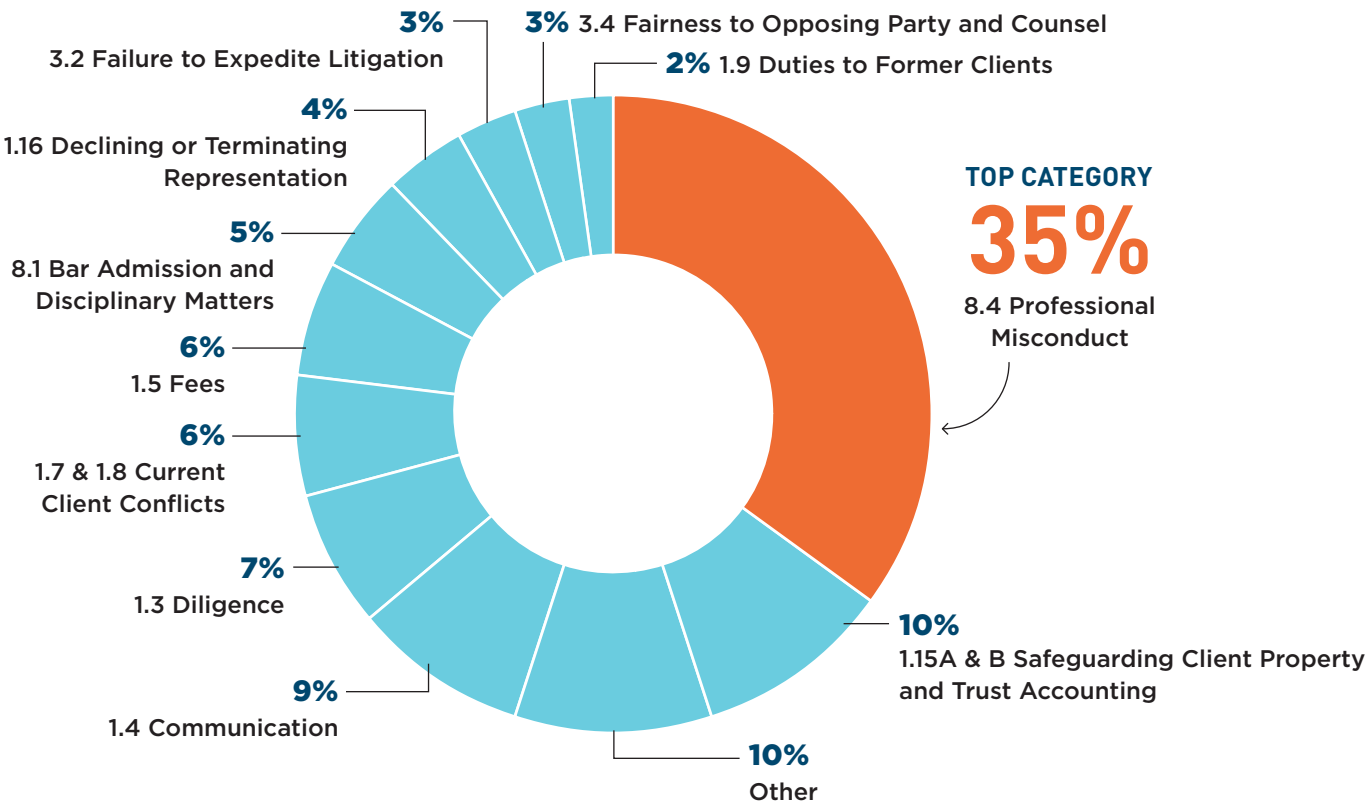
In 2024, 50 lawyers were disciplined and one lawyer had more than one disciplinary action, for a total of 51 disciplinary actions. The chart at right reports the number of disciplinary actions imposed over the last four calendar years.



8. Reciprocal suspensions may exceed three years to align with the discipline imposed in the originating jurisdiction.

CONTINUED >

Ethics Rules Violations – By Grouped Percentage
FOR 2024



Ethics Rules Violations

In 2024, the most common rule violations in disciplinary proceedings were related to professional misconduct (RPC 8.4)⁹, 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 2024 by group percentage and by individual count.^{10, 11}



To review these and other RPC, visit the Washington Supreme Court's website at www.courts.wa.gov.

9. RPC 8.4 violations may include, among other misconduct, criminal conduct, dishonesty, and conduct prejudicial to the administration of justice.




































10. 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.

11. "Other" reflects categories of RPC violations that consisted of three or fewer instances in 2024.

CONTINUED >

Ethics Rules Violations - By Count
FOR 2024

Each dot
denotes
one count

 <p>1.4 Communication (17)</p>	 <p>8.4(d) Prejudicial to the Admin of Justice (15)</p>	 <p>1.15A Safeguarding Property (13)</p>	 <p>1.3 Diligence (13)</p>	 <p>8.4(c) Dishonesty, Fraud, Deceit or Misrepresenta- tion (13)</p>	 <p>1.5 Fees (10)</p>	 <p>8.1 Bar Admission and Disciplinary Matters (9)</p>
 <p>8.4(b) Criminal Act (9)</p>	 <p>1.16 Declining or Terminating Representation (8)</p>	 <p>1.7 Current Client Conflicts (General) (7)</p>	 <p>8.4(i) Moral Turpitude, Corruption or Disregard of Rule of Law (7)</p>	 <p>8.4(l) ELC violation (7)</p>	 <p>1.15B Required Trust Account Records (5)</p>	 <p>3.2 Failure to Expedite Litigation(5)</p>
 <p>3.4 Fairness to Opposing Party and Counsel (5)</p>	 <p>1.8 Current Client Conflicts (Specific) (4)</p>	 <p>1.9 Duties to Former Clients (4)</p>	 <p>8.4(n) Unfitness to Practice Law (4)</p>	 <p>8.4(j) Violate a Court Order (4)</p>	 <p>1.2 Scope of Representation and Allocation of Authority Between Client and Lawyer (3)</p>	 <p>1.6 Confidentiality of Information (2)</p>
 <p>3.1 Meritorious Claims and Contentions (2)</p>	 <p>4.4 Respect for Rights of Third Person (2)</p>	 <p>8.4(a) Attempt, Assists or Induce Violation of the RPC (2)</p>	 <p>1.1 Competence (1)</p>	 <p>1.14 Client with Diminished Capacity (1)</p>	 <p>1.18 Duties to Prospective Client (1)</p>	 <p>3.3 Candor Toward the Tribunal (1)</p>
 <p>3.5 Impartiality and Decorum of the Tribunal (1)</p>	 <p>4.1 Truthfulness in Statements to Others (1)</p>	 <p>4.3 Dealing with Unrepresented Person (1)</p>	 <p>4.2 Communication With Person Represented by Counsel (1)</p>	 <p>5.3 Responsibilities Regarding Nonlawyer Assistants (1)</p>	 <p>8.4(g) Discriminatory Act (1)</p>	 <p>8.4(k) Violation Oath (1)</p>

Lawyers Disciplined

[SUPREME COURT OPINIONS >](#)

[In re Disciplinary Proc. Against Kelley](#)

[In re Disciplinary Proc. Against Huynh](#)

Disbarments (15)

LAWYER NAME	BAR NO.
Benton, Samantha Marie	56376*
Dean, Faiyaz A	34322*
Eckardt, Marc A	30690*
Efimova, Olga V	52498
Graham, Michael	37391
Green, John O'Neill	33827*
Green, John O'Neill	33827^
Huynh, Thi Anh	34947
Inglis, Frank Benjamin	7080*
Kelley, Troy Xavier	30998
Mills, James	53561*
Pimpleton, Kristi	34419
Rousso, Lee Howard	33340
Taylor-Manning, Robert Jess	21890
Von Tersch, Glenn E	29154*

Resignations in Lieu of Discipline (9)

LAWYER NAME	BAR NO.
George, Nicholas	20490
Hodari, Ajili	37251
Huff, Robert Scott	20507
Johnson, Hugo Cornelius	45342
Kovacevich, Robert Eugene	2723
Palumbo, Ralph Howard	4751
Peach, Charles Wade	13744
Tanijo, Steven	40060
Vance, Julie A	32189

Suspensions (16)

LAWYER NAME	BAR NO.
Altaras, Leah Rachel	39266
Bottimore, Leslie R	29957
Bradshaw, Gregg Eugene	21299
Butler, Matthew W	27993
Culbertson, Ivan	30462
Ewetuga, Michael Olufemi	37596
Greiner, Richard Charles	13230
Helenius, Kevin Thomas	11064
Humphries, Neil Edward	2737
Kelley, F. Dana	17460
Kerr, Benjamin David	41442
McBride, James Dewitt	1603
Moceri, Mike	47787
Pirzadeh, Jean Ann Abrahamson	31080*
Smith, Nicholas	46386*
Wong, Terence Kain	24502

Reprimands (11)

LAWYER NAME	BAR NO.
Best, Ryan M.	33672
Guiley, Gina Marie	54521*
Holman, Lavette Nadine	41588
Macklin, Matthew Thomas	57867
Oladapo, Ajibola Oluyemisi	41461
Osborn, Gerald T.	13712
Osemene, Justin C	28082
Reitman, Daniel Robert	26165*
Rothauge, Renee Elizabeth	20661*
Starr, Adam Michael	45762*
Turner, Steven Erik	33840

*Reciprocal Discipline | ^Multiple sanctions were ordered



For more information, please visit 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; and
- > **serving** as a probation monitor following imposition of a disciplinary sanction.

In 2024, the ADC Panel consisted of 27 volunteer lawyer members. Members of the ADC Panel were assigned to two new disciplinary related probations and assisted ODC in resolving eight investigations.

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	2022	2023	2024
Probation	12	16	15
Restitution	6	10	13
Costs	33	34	38

CONTINUED >

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	2022	2023	2024
Total	4	3	5



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 2024, the Fund gave over \$435,000 in gifts.**

CLIENT PROTECTION FUND ¹²	2022	2023	2024
Member Assessment	\$20	\$20	\$15
Number of Requests Granted	33	42	25
Of These, Number of Lawyers Involved	13	14	13
TOTAL GIFTS	\$587,815	\$342,424	\$436,328

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

CONTINUED >

Funding the Lawyer Discipline System

License fees fund the lawyer discipline system—there is no public funding.¹³

DISCIPLINE SYSTEM REVENUE AND EXPENSES¹⁴

REVENUE	2022	2023	2024
Recovery of Discipline Costs	\$85,405	\$51,271	\$54,568
Discipline History Summaries	\$19,433	\$17,969	\$18,510
Misc ¹⁵	\$893	\$850	\$170
TOTAL REVENUE	\$105,731	\$70,090	\$73,248
EXPENSES	2022	2023	2024
Investigation/Prosecution	\$5,743,648	\$5,683,853	\$6,039,598
Disciplinary Board Expenses	\$225,893	\$260,801	\$305,508
Hearing Officer Expenses	\$32,763	\$30,891	\$40,870
TOTAL EXPENSES	\$6,002,304	\$5,975,545	\$6,385,976
NET TOTAL EXPENSES	\$5,896,573	\$5,905,455	\$6,312,728



Updates To The Discipline And Disability Case System And Document Management Software

After four years of development, a new discipline and disability case management and document management system, Litify, went live in 2024. This new system, based upon a Salesforce platform, replaced a nearly 20-year-old in-house built software known as GILDA. This project involved four WSBA departments: the Office of Disciplinary Counsel, the Office of General Counsel, the Regulatory Services Department, and the Information Technology Department. These departments worked collaboratively to add functionality such as document and case matter integration, auto-created tasks, enhanced reporting capabilities, and soon, an online filing portal. This new system enables the WSBA to effectively track grievances, discipline, disability, reinstatements, custodianships, and proceedings for all licensed legal professionals in Washington State, including lawyers, limited practice officers, and limited license legal technicians.

¹³. 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.

¹⁴. Lawyer discipline system expenses are based on the WSBA fiscal year.

¹⁵. 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.¹⁶

LPOs may select, prepare, and complete forms approved by the Limited Practice Board for use in closing a loan, extension of credit, sale, or other transfer of real or personal property. *See Admission and Practice Rule (APR) 12 for more information.* LLLTs are licensed to provide limited legal assistance to clients in family law matters. *See APR 28 for more information.*

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:

- > each regulatory board acts as the intermediate appellate body, akin to the Disciplinary Board, to review hearing records and stipulations;
- > a discipline committee of each regulatory board serves the function of a review committee; and
- > RSD staff and the chair of each discipline committee conduct an 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.

STATISTICAL INFORMATION

LPO DISCIPLINARY ACTIONS	2022	2023	2024
Number of Active Licensees	793	731	706
Disciplinary Grievances Received	10	7	9
Disciplinary Grievances Resolved	7	7	10
Matters Diverted	0	0	0
Disciplinary Actions Imposed	1	0	1

2024 DISCIPLINARY ACTIONS IMPOSED

Reprimands (1)

Jackman, Jessica D – #3122LPO

LLLT DISCIPLINARY ACTIONS	2022	2023	2024
Number of Active Licensees	76	81	77
Disciplinary Grievances Received	4	5	1
Disciplinary Grievances Resolved	3	5	1
Matters Diverted	0	0	0
Disciplinary Actions Imposed	0	0	0

16. 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 requirement to July 31, 2023. Further information is available on our [website](#).

