

IN THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, : No. 1796 Disciplinary Docket No. 3
Petitioner :
: No. 78 DB 2011
v. :
: Attorney Registration No. 81329
ANNE MICHELLE CAMPBELL, :
Respondent : (Philadelphia)

ORDER

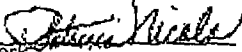
PER CURIAM:

AND NOW, this 2nd day of April, 2012, upon consideration of the Recommendation of the Three-Member Panel of the Disciplinary Board dated November 2, 2011, the Joint Petition in Support of Discipline on Consent is hereby granted pursuant to Rule 215(g), Pa.R.D.E., and it is

ORDERED that Anne Michelle Campbell is suspended on consent from the Bar of this Commonwealth for a period of three years, and she shall comply with all the provisions of Rule 217, Pa.R.D.E.

It is further ORDERED that respondent shall pay costs to the Disciplinary Board pursuant to Rule 208(g), Pa.R.D.E.

A True Copy Patricia Nicola
As Of 4/2/2012

Attest: 
Chief Clerk
Supreme Court of Pennsylvania

BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA

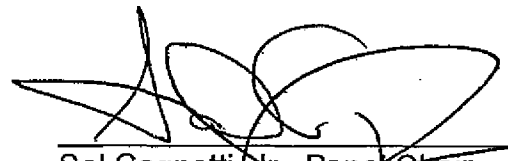
OFFICE OF DISCIPLINARY COUNSEL : No. 78 DB 2011
Petitioner :
v. : Attorney Registration No. 81329
ANNE MICHELLE CAMPBELL :
Respondent : (Philadelphia)

RECOMMENDATION OF THREE-MEMBER PANEL
OF THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA

The Three-Member Panel of the Disciplinary Board of the Supreme Court of Pennsylvania, consisting of Board Members Sal Cogneetti, Jr., R. Burke McLemore, Jr., and Stephan K. Todd, has reviewed the Joint Petition in Support of Discipline on Consent filed in the above-captioned matter on September 7, 2011.

The Panel approves the Joint Petition consenting to a three year suspension and recommends to the Supreme Court of Pennsylvania that the attached Petition be Granted.

The Panel further recommends that any necessary expenses incurred in the investigation and prosecution of this matter shall be paid by the respondent-attorney as a condition to the grant of the Petition.


Sal Cogneetti, Jr., Panel Chair
The Disciplinary Board of the
Supreme Court of Pennsylvania

Date: 11/2/2011

BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, :
Petitioner :
: No. 78 DB 2011
v. :
: Atty. Reg. No. 81329
ANNE MICHELLE CAMPBELL, :
Respondent : (Philadelphia)

JOINT PETITION IN SUPPORT OF DISCIPLINE
ON CONSENT UNDER RULE 215(d), Pa.R.D.E.

Petitioner, Office of Disciplinary Counsel ("ODC"), by Paul J. Killion, Chief Disciplinary Counsel, and Robert P. Fulton, Esquire, Disciplinary Counsel, and Respondent, Anne Michelle Campbell, by her counsel, Samuel C. Stretton, Esquire, file this Joint Petition In Support Of Discipline On Consent Under Rule 215(d) of the Pennsylvania Rules of Disciplinary Enforcement ("Pa.R.D.E.") and respectfully represent that:

1. Petitioner, whose principal office is located at the Pennsylvania Judicial Center, Suite 2700, 601 Commonwealth Avenue, Harrisburg, Pennsylvania 17106, is vested, pursuant to Pa.R.D.E. 207, with the power and the duty to investigate all matters involving alleged misconduct of an attorney admitted to practice law in the Commonwealth of Pennsylvania and to prosecute all

FILED

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Office of the Secretary
The Disciplinary Board of the
Supreme Court of Pennsylvania

disciplinary proceedings brought in accordance with the various provisions of the aforesaid Rules.

2. Respondent, Anne Michelle Campbell, Esquire, was born in 1968 and was admitted to practice law in the Commonwealth on February 12, 1998. Respondent's registered office address is Suite 1530, 100 South Broad Street, Philadelphia, Pennsylvania 19110. Respondent is subject to the disciplinary jurisdiction of the Disciplinary Board of the Supreme Court of Pennsylvania.

3. By DB-7 letter dated February 23, 2011, ODC notified Respondent of allegations of misconduct. Respondent did not answer the DB-7.

4. On May 18, 2011, ODC filed with the Board Secretary a Petition for Discipline, which was docketed at 78 DB 2011. On May 26, 2011, ODC served Respondent with the Petition for Discipline. Respondent did not answer the Petition for Discipline.

SPECIFIC FACTUAL ADMISSIONS AND
RULES OF PROFESSIONAL CONDUCT VIOLATED

5. Respondent stipulates that the following factual allegations are true and correct and that she violated the Rules of Professional Conduct and Rules of Disciplinary Enforcement set forth in paragraph 47, *infra*.

6. At all times relevant hereto, Respondent has had an office address at Suite 1530, 100 South Broad Street, Philadelphia, Pennsylvania 19110.

7. Respondent also has a mailing address at 119 East Cliveden Street, Philadelphia, Pennsylvania 19119.

8. By Order dated March 3, 2010 of the Pennsylvania Supreme Court, Respondent was transferred to administrative suspension pursuant to Pa.R.D.E. 219.

a. The effective date of the Order was April 2, 2010.

9. By letter dated March 3, 2010 ("March 3, 2010 Letter"), Suzanne Price, attorney registrar, notified Respondent of the Order and the requirements of Pa.R.D.E. 217 via United States First Class Mail and Certified Mail, return receipt requested, which letter, Order, and notice Respondent received.

10. From April 2, 2010 to present, Respondent has been continuously suspended from the bar of the Commonwealth of Pennsylvania.

11. By Order of the Supreme Court dated July 28, 2010, Respondent was suspended for a period of one year and one day.

12. At no point did Respondent file with the Disciplinary Board Secretary the requisite verified statement of compliance pursuant to Pa.R.D.E. 217(e).

The Henderson Matter

13. Subsequent to Respondent's transfer to administrative suspension, Respondent was retained by Robert Henderson, Jr. ("Henderson") to represent Henderson in a custody matter, *Henderson v. Stuckey*, docket no. DR-0C0307764 ("Henderson Matter").

14. Respondent had not regularly represented Henderson.

15. Respondent did not communicate to Henderson the basis or rate of the fee, in writing, before or within a reasonable time after commencing the representation.

16. Respondent failed to inform Henderson in writing of the notification requirements regarding the status of Respondent's malpractice insurance.

17. At the time Respondent was retained, the Henderson Matter was pending before the Honorable Barbara A. Joseph ("Judge Joseph") of the Philadelphia Court of

Common Pleas and was scheduled for a *Plowman* hearing¹ on May 13, 2010.

18. On May 13, 2010, Respondent entered her appearance on behalf of Henderson in the Henderson Matter.

19. Henderson's opposing party in the Henderson Matter was Tenia Stuckey ("Stuckey") who appeared *pro se*.

20. On May 13, 2010, Judge Joseph received testimony in the Henderson Matter and Respondent was actively engaged in the examination of the witnesses.

21. Following the completion of the evidence on May 13, 2010, Judge Joseph relisted the Henderson Matter for June 22, 2010.

22. On June 22, 2010, Respondent again entered her appearance on behalf of Henderson in the Henderson Matter.

23. Prior to the Henderson Matter being called before the court, Respondent informed courtroom personnel that she would be requesting a continuance due to: 1) the death of her grandfather; and 2). Henderson's failure to appear at that time.

a. Shortly thereafter Henderson appeared.

¹ A *Plowman* hearing is convened when a parent with physical custody of a child wants to move the child to another jurisdiction.

24. After Henderson appeared, Respondent informed Judge Joseph's judicial aide that Respondent would be requesting a continuance because "there was something happening with her law license."

25. At the time that Respondent made the representations contained in paragraphs 23 and 24, Respondent knew that the representations were not true.

26. Following Respondent's representations contained in paragraphs 23 and 24, Judge Joseph attempted to address, on the record, Respondent's administrative suspension *vis-à-vis* Respondent's appearances on behalf of Henderson on May 13, 2010 and June 22, 2010.

27. Respondent departed the courtroom as Judge Joseph was attempting to address Respondent's administrative suspension.

28. As a result of Respondent leaving the courtroom, Henderson agreed to proceed with the Henderson Matter without Respondent or other counsel.

29. At no point did Respondent inform Henderson, the court, or Stuckey that Respondent was ineligible to practice law in the Commonwealth of Pennsylvania based upon Respondent's administrative suspension.

30. Despite repeated requests by Henderson, Respondent failed to refund any of the retainer paid to her by Henderson.

The Bachmann Matter

31. Prior to Respondent's suspension, Respondent was appointed to represent Edward Bachman ("Bachman") in a criminal matter in the Philadelphia Court of Common Pleas under caption of *Commonwealth v. Edward Bachman*, docket no. CP-51-CR-0014754-2009 ("Bachman Matter").

32. On December 7, 2009, Respondent entered her appearance on behalf of Bachman in the Bachman Matter.

33. On March 5, 2010, Respondent made an advance defense request for a continuance in the Bachman Matter, which was granted until June 3, 2010 in Courtroom 904, Criminal Justice Center.

34. Respondent failed to withdraw from the representation after Respondent's transfer to administrative suspension.

35. On June 3, 2010, Respondent appeared in Courtroom 904 before the Honorable Daniel J. Anders in the Bachman Matter, at which time it was revealed that the complainant in the Bachman Matter was deceased.

36. Judge Anders continued the matter until June 4, 2010, to determine the status of the prosecution.

37. Respondent failed to inform Judge Anders, the District Attorney's Office, and Bachman that Respondent was administratively suspended from the practice of law.

The McCormick Matter

38. By letter dated June 14, 2010 ("June 14th Letter"), Respondent notified the Honorable Ida K. Chen ("Judge Chen") of the Philadelphia Court of Common Pleas that Respondent would be representing Lorrie [sic] McCormick ("McCormick"), on behalf of Emily McCormick, under caption of *McCormick O/B/O McCormick v. Costello*, D.R. No. 0905V7157, a protection from abuse matter ("McCormick Matter").

39. In the June 14th Letter, Respondent advised Judge Chen that Respondent:

- a. had been in contact with the defendant, Mr. Costello;
- b. was advised by Mr. Costello that he was requesting a continuance of the hearing for the purpose of retaining counsel to represent him;

- c. understood that Lauren Kane ("Kane") "may assist [Costello] in the next court date";
- d. on behalf of McCormick, agreed to the continuance; and
- e. left a message for Kane regarding the substance of the June 14th Letter but had not heard from Kane.

40. Judge Chen granted the continuance.

41. Thereafter, Respondent failed to appear on behalf of McCormick.

42. At the time that Respondent sent the June 14, 2010 Letter to Judge Chen, Respondent was on administrative suspension and ineligible to represent McCormick.

43. At the time McCormick contacted Respondent regarding the representation, Respondent was on administrative suspension and ineligible to represent McCormick.

44. Respondent failed to notify Judge Chen that Respondent was on administrative suspension.

45. Respondent failed to inform McCormick that Respondent was on administrative suspension.

46. Respondent failed to inform Kane or Costello that Respondent was on administrative suspension.

47. Respondent admits that by her conduct as alleged in Paragraphs 8 through 46 above, Respondent has violated the following Rules of Professional Conduct ("RPC") and Rules of Disciplinary Enforcement ("Pa.R.D.E."):

- a. RPC 1.4(a)(3) [All], which states that a lawyer shall keep a client reasonably informed about the status of the client's matter;
- b. RPC 1.4(b) [effective 1-1-05] [All], which states that a lawyer shall explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation;
- c. RPC 1.4(c) [Henderson only], which states that a lawyer in private practice shall inform a client in writing if the lawyer does not have professional liability insurance in specified amounts;
- d. RPC 1.5(b) [Henderson only], which states that when the lawyer has not regularly represented the client, the basis or rate of the fee shall be communicated to the client,

in writing, before or within a reasonable time after commencing the representation;

e. RPC 1.16(a)(1) [All], which states that except as stated in paragraph (c), a lawyer shall not represent a client or, where representation has commenced, shall withdraw from the representation of a client if the representation will result in violation of the rules of professional conduct or other law;

f. RPC 1.16(c) [Henderson, McCormick], which states that a lawyer must comply with applicable law requiring notice to or permission of a tribunal when terminating a representation of a client;

g. RPC 1.16(d) [Henderson, McCormick], which states that, upon termination of representation, a lawyer shall take steps to the extent reasonable practicable to protect a client's interests;

h. RPC 5.5(a) [All], which states that a lawyer shall not practice in a jurisdiction in

violation of the regulation of the legal profession in that jurisdiction;

- i. RPC 8.4(c) [All], which states that it is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit or misrepresentation;
- j. RPC 8.4(d) [All], which states that it is professional misconduct for a lawyer to engage in conduct that is prejudicial to the administration of justice;
- k. Pa.R.D.E. 203(b)(3) [All], which states that it is grounds for discipline for a lawyer to willfully violate any other provision of the Enforcement Rules, via the Enforcement Rules charged in subsections (l) through (t), *infra*;
- l. Pa.R.D.E. 217(b) [All], which states that a formerly admitted attorney shall promptly notify, or cause to be notified, by registered or certified mail, return receipt requested, all clients involved in pending litigation of the suspension or transfer to

administrative suspension or inactive status;

m. Pa.R.D.E. 217(c)(1) [All], which states that a formerly admitted attorney shall promptly notify, or cause to be notified, of the administrative suspension or transfer to inactive status, by registered or certified mail, return receipt requested: all persons or their agents or guardians to whom a fiduciary duty is or may be owed at any time after the administrative suspension or transfer to inactive status. The responsibility of the formerly admitted attorney to provide the notice required by this subdivision shall continue for as long as the formerly admitted attorney is administratively suspended or on inactive status;

n. Pa.R.D.E. 217(c)(2) [All], which states that a formerly admitted attorney shall promptly notify, or cause to be notified, of the suspension or transfer to administrative suspension or inactive status, by registered

or certified mail, return receipt requested:

(2) all other persons with whom the formerly admitted attorney may at any time expect to have professional contacts under circumstances where there is a reasonable probability that they may infer that he or she continues as an attorney in good standing. The responsibility of the formerly admitted attorney to provide the notice required by this subdivision shall continue for as long as the formerly admitted attorney is administratively suspended or on inactive status;

o. Pa.R.D.E. 217(d) [All], which states that a formerly admitted attorney, following the entry of an order of suspension or transfer to administrative suspension or inactive status, shall not accept any new retainer or engage as an attorney for another in any new case or legal matter of any nature;

p. Pa.R.D.E. 217(e), which states that within ten days after the effective date of the disbarment, suspension or transfer to

inactive status order, the formerly admitted attorney shall file with the Board a verified statement showing that the provisions of the order and these rules have been fully complied with and all other state, federal and administrative jurisdictions to which such person is admitted to practice. Such statement shall also set forth the residence or other address of the formerly admitted attorney where communications to such person may thereafter be directed;

- q. Pa.R.D.E. 217(j)(1) [All], which states that a formerly admitted attorney may not engage in any form of law-related activities in the Commonwealth except that all law-related activities of the formerly admitted attorney shall be conducted under the supervision of a member in good standing of the Bar of the Commonwealth who shall be responsible for ensuring the formerly admitted attorney complies with the requirements of subdivision (j);

r. Pa.R.D.E. 217(j)(2) [All], which states that the only law-related activities that may be conducted [under the direct supervision of a member in good standing of the Bar of this Commonwealth, as provided in Pa.R.D.E. 217(j)(1)] by a formerly admitted attorney are the following:

- (i) legal work of a preparatory nature, such as legal research, assembly of data and other necessary information, and drafting of transactional documents, pleadings, briefs, and other similar documents;
- (ii) direct communication with the client or third parties to the extent permitted by paragraph (3); and
- (iii) accompanying a member in good standing of the Bar of this Commonwealth to a deposition or other discovery matter or to a meeting regarding a matter that is not currently in litigation, for the limited purpose of providing clerical

assistance to the member in good standing who appears as the representative of the client;

s. Pa.R.D.E. 217(j)(3) [All], which states that a formerly admitted attorney may have direct communication with a client, on behalf of another attorney who is representing the client, only if the direct communication is limited to ministerial matters and the formerly admitted attorney clearly indicates in any such communication that he or she is a legal assistant and identifies the supervising attorney;

t. Pa.R.D.E. 217(j)(4)(ii), (iv), (v), (vi), (vii) [All] and (ix) [McCormick only], which state respectively that without limiting the other restrictions in this subdivision (j), a formerly admitted attorney is specifically prohibited from engaging in any of the following activities: (ii) any law-related activities from an office that is not staffed by a supervising attorney on a full time basis; (iv) representing himself or

herself as a lawyer or person of similar status; (v) having any contact with clients either in person, in writing, or by telephone, other than as provided for in paragraph (3); (vi) rendering legal consultation or advice to a client; (vii) appearing on behalf of a client in any hearing or proceeding or before any judicial officer; and (ix) negotiating or transacting any matter for or on behalf of a client with third parties or having any contact with third parties regarding such a negotiation or transaction.

SPECIFIC JOINT RECOMMENDATION FOR DISCIPLINE

48. ODC and Respondent jointly recommend that the appropriate discipline for Respondent's admitted misconduct is a three-year suspension.

49. Respondent hereby consents to that discipline being imposed upon her by the Supreme Court of Pennsylvania. Attached to this Petition is Respondent's executed Affidavit required by Rule 215(d), Pa.R.D.E., stating that she consents to the recommended discipline and

including the mandatory acknowledgements contained in Rule 215(d)(1) through (4), Pa.R.D.E.

50. In support of ODC and Respondent's joint recommendation, it is respectfully submitted that the following mitigating factors are present:

- a. if this matter proceeded to hearing, Respondent would testify that she was suffering from and treating sporadically for various medical maladies including, but not limited to, post-partum depression and hypothyroidism.
- b. Respondent is remorseful.
- c. Respondent has cooperated with ODC as evidenced by her agreement to enter into this Joint Petition for Consent Discipline.

51. In cases involving the unauthorized practice of law, attorneys have generally received suspensions ranging from one year and one day to four years. See, e.g., *Office of Disciplinary Counsel v. Sharon Goldin-Didinsky*, No. 87 DB 2003, D.Bd. Rpt. 8/27/2004 (S.Ct. Order 12/13/04) (one-year-and-one-day suspension); *Office of Disciplinary Counsel v. Alex Hugues Pierre*, No. 134 DB 2004, D.Bd. Rpt. 12/21/2005 (S.Ct. Order 3/28/2006) (three-year

suspension) (misrepresentation to clients and courts and failure to file verified statement with Board); *Office of Disciplinary Counsel v. Jeffery L. Krain*, No. 96 & 138 DB 2007, D.Bd. Rpt. 7/23/2008 (S.Ct. Order 11/18/2008) (four-year suspension) (extensive unauthorized practice; guilty plea to willful failure to pay income taxes; respondent was tending to elderly father).

In the instant matter, Respondent has cooperated with ODC by agreeing to enter into this consent discipline.

However, Respondent arrives at this point in her career as a direct result of her failure to address any of her prior disciplinary issues as well as the instant matter. Respondent was originally to appear before Chief Disciplinary Counsel for the imposition of an Informal Admonition ("IA") as a result of Respondent's failure to exercise due diligence and effective communication on behalf of a client in a domestic relations matter to the client's detriment. Respondent did not respond to inquiries made by ODC. Respondent failed to appear for the IA. Subsequent to Respondent's failure to appear for the IA, ODC filed a petition for discipline, which resulted in Respondent being suspended by Order of the Supreme Court for a period of one year and one day (S.Ct. Order dated

7/28/10). This suspension encompassed Respondent's failure to appear as well as an additional charge of her failure to adequately communicate and appropriately terminate her services in a domestic relations matter. Respondent did not participate in the disciplinary proceedings against her in that matter despite adequate notices. Respondent's failures included, but were not limited to: 1) failure to respond to ODC's DB-7 Request for Statement of Respondent's Position; 2) failure to answer the petition for discipline; 3) failure to attend either the prehearing conference or the disciplinary hearing; and 4) failure to file briefs with either the hearing committee or the Board.

It was during the period of Respondent's administrative suspension that the Supreme Court entered the Order suspending her for one year and one day. In the instant matter, Respondent failed to answer ODC's Request for Statement of Respondent's Position and failed to answer the Petition for Discipline. As a result of ODC's ongoing efforts to afford Respondent every opportunity to appear at the instant proceedings, Respondent finally contacted counsel.

Respondent, through her counsel, recognizes that her complete lack of attention to clients, the courts, and the

disciplinary process, has brought her to this point. In view of this history and the attendant violations of the Rules of Professional Conduct and Rules of Disciplinary Enforcement, Respondent recognizes, through her counsel, and with the agreement of ODC that the appropriate discipline in the instant matter is the recommended three-year suspension.

WHEREFORE, Petitioner and Respondent respectfully request that:

- a. Pursuant to Rule 215(e) and 215(g), Pa.R.D.E., a three-member panel of the Disciplinary Board review and approve the above Joint Petition In Support Of Discipline On Consent and file its recommendation with the Supreme Court of Pennsylvania in which it is recommended the Supreme Court enter an Order that Respondent receive a three-year suspension; and
- b. Pursuant to Rule 215(i), the three-member panel of the Disciplinary Board order Respondent to pay the necessary expenses incurred in the investigation of this matter as a condition to the grant of the Petition and that all expenses

be paid by Respondent before the imposition of discipline under Rule 215(g), Pa.R.D.E.

Respectfully submitted,

OFFICE OF DISCIPLINARY COUNSEL

PAUL J. KILLION
CHIEF DISCIPLINARY COUNSEL

6 SEPT 2011

Date

By: 

Robert P. Fulton, Esquire
Disciplinary Counsel
Attorney Regis. No. 37935
Seven Penn Center, 16th Floor
1635 Market Street
Philadelphia, PA 19103
(215) 560-6296

and

9/2/11

Date

By: 

Anne Michelle Campbell
Attorney Regis. No. 81329
Respondent

and

9/2/11

Date

By: 

Samuel C. Stretton, Esquire
Counsel for Respondent
Attorney Regis. No. 18491
301 South High Street
P.O. Box 3231
West Chester, PA 19381-3231


BEFORE THE DISCIPLINARY BOARD OF THE
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OFFICE OF DISCIPLINARY COUNSEL, :
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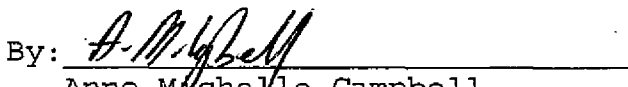
VERIFICATION

The statements contained in the foregoing Joint
Petition in Support of Discipline On Consent Under Rule
215(d), Pa.R.D.E., are true and correct to the best of our
knowledge or information and belief and are made subject to
the penalties of 18 Pa.C.S. §4904, relating to unsworn
falsification to authorities.

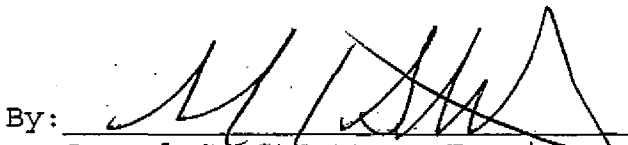
6 SEPT 2011
Date

By: 
Robert P. Fulton Esquire
Disciplinary Counsel

9/2/11
Date

By: 
Anne Michelle Campbell
Respondent

9/2/11
Date

By: 
Samuel C. Stretton, Esquire
Counsel for Respondent

BEFORE THE DISCIPLINARY BOARD OF THE
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ANNE MICHELLE CAMPBELL, :

Respondent : (Philadelphia)

AFFIDAVIT UNDER RULE 215(d), Pa.R.D.E.

Respondent, Anne Michelle Campbell, hereby states that she consents to the imposition of a three-year suspension, as jointly recommended by Petitioner, Office of Disciplinary Counsel, and Respondent in the Joint Petition In Support Of Discipline On Consent and further states that:

1. Her consent is freely and voluntarily rendered; she is not being subjected to coercion or duress; and she is fully aware of the implications of submitting the consent;

2. She acknowledges that she is fully aware of her right to consult and employ counsel to represent her in the instant proceeding. She has retained, consulted with and acted upon the advice of counsel in connection with her decision to consent to discipline. Counsel for Respondent

is Samuel C. Stretton, Esquire, 301 South High Street, West Chester, PA 19381;

3. She is aware that there is presently pending a disciplinary proceeding at No. 78 DB 2011 involving allegations that she has been guilty of misconduct as set forth in the Joint Petition;

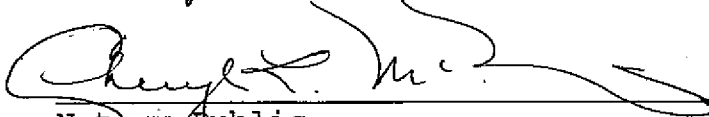
4. She acknowledges that the material facts set forth in the Joint Petition are true; and

5. She consents because she knows that if charges pending at No. 78 DB 2011 continue to be prosecuted, she could not successfully defend against them.



Anne Michelle Campbell
Respondent

Sworn to and subscribed
before me this 2 day
of September, 2011.



Notary Public