

IN THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, : No. 2439 Disciplinary Docket No. 3
: :
Petitioner : :
: : No. 205 DB 2017
v. : :
: :
: : Attorney Registration No. 307279
MEGAN ANNE KERRIGAN, : :
: :
Respondent : (Dauphin County)

ORDER

PER CURIAM

AND NOW, this 2nd day of October, 2023, having failed to respond to a Rule to Show Cause why Respondent should not be disbarred, the Rule is made absolute, and Megan Anne Kerrigan is disbarred from the Bar of this Commonwealth. See Pa.R.D.E. 208(f)(9). Respondent shall comply with the provisions of Pa.R.D.E. 217 and pay costs to the Disciplinary Board. See Pa.R.D.E. 208(g).

A True Copy Nicole Traini
As Of 10/02/2023

Attest: 
Chief Clerk
Supreme Court of Pennsylvania

IN THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL : No. 2439 Disciplinary Docket No. 3
Petitioner :
: No. 205 DB 2017
v. :
: Attorney Registration No. 307279
MEGAN ANNE KERRIGAN, :
Respondent : (Dauphin County)

**PETITION FOR ISSUANCE OF A RULE TO SHOW CAUSE WHY AN
ORDER OF DISBARMENT SHOULD NOT BE ISSUED
PURSUANT TO Pa.R.D.E. 208(f)(8)**

OFFICE OF DISCIPLINARY COUNSEL

Thomas J. Farrell
Chief Disciplinary Counsel

Kristin A. Wells
Disciplinary Counsel

District III Office
601 Commonwealth Avenue, Suite 5800
P.O. Box 62675
Harrisburg, Pennsylvania 17106
(717) 772-8572

IN THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL : No. 2439 Disciplinary Docket No. 3
Petitioner :
: No. 205 DB 2017
v. :
: Attorney Registration No. 307279
MEGAN ANNE KERRIGAN, :
Respondent : (Dauphin County)

**PETITION FOR ISSUANCE OF A RULE TO SHOW CAUSE WHY AN
ORDER OF DISBARMENT SHOULD NOT BE ISSUED
PURSUANT TO Pa.R.D.E. 208(f)(8)**

TO THE HONORABLE CHIEF JUSTICE AND JUSTICES OF THE SUPREME
COURT OF PENNSYLVANIA:

Petitioner, Office of Disciplinary Counsel (“ODC”), by Thomas J. Farrell, Esquire, Chief Disciplinary Counsel, and by Kristin A. Wells, Esquire, Disciplinary Counsel, files this Petition for Issuance of a Rule to Show Cause Why an Order of Disbarment Should Not be Issued Pursuant to Pennsylvania Rule of Disciplinary Enforcement 208(f)(8), and in support thereof states:

1. ODC, whose principal office is located at the Pennsylvania Judicial Center, 601 Commonwealth Avenue, Suite 2700, P.O. Box 62625, Harrisburg, PA 17106-2625, is invested pursuant to Pennsylvania Rules of Disciplinary Enforcement (“Pa.R.D.E.”) 207, with the power and duty to investigate all matters involving alleged misconduct of an attorney admitted to practice law in the Commonwealth of Pennsylvania and to prosecute all disciplinary proceedings

brought in accordance with the various provisions of said Rules of Disciplinary Enforcement.

2. Respondent, Megan Anne Kerrigan, is a formerly admitted attorney. She was born on October 6, 1968 and was admitted to practice law in the Commonwealth of Pennsylvania on November 9, 2009. Her attorney registration number is 307297.

3. Respondent is subject to the disciplinary jurisdiction of the Disciplinary Board of the Supreme Court of Pennsylvania.

4. Respondent's last Attorney Registration Statement was filed with the Attorney Registration Office on September 28, 2016. At that time, Respondent listed her office address as Kerrigan Legal, 260 North Street, First Floor, Harrisburg, Pennsylvania 17101, and her residence address as 1611 North Second Street, Harrisburg, Pennsylvania 17102.

5. By Order dated July 26, 2017, effective August 25, 2017, this Honorable Court directed that Respondent be administratively suspended for failure to file her annual registration form.

6. On January 3, 2018, ODC filed with this Honorable Court a Petition for Temporary Suspension and Related Relief Pursuant to Pa.R.D.E. 208(f)(1) and (5) ("ETS Petition"). A true and correct copy of the ETS Petition is attached as ODC-1.

7. The ETS Petition alleged, *inter alia*, that:
- a. Approximately 16 items, totaling \$52,399.64, had been presented against Respondent's IOLTA for which there were insufficient funds available;
 - b. Respondent failed to respond to inquiries from the Pennsylvania Lawyers Fund for Client Security ("Client Security") concerning the overdrafts;
 - c. Upon information and belief, Respondent was funneling money for Synergy Attorney Services, LLC ("SAS"), a national foreclosure defense attorney service firm owned by non-attorneys, for which Respondent served as Managing Attorney, through the IOLTA;
 - d. Upon information and belief, Respondent regularly improperly deposited retainer fees from SAS clients directly into her operating account, totaling \$97,615.83 over a nine month period from January 4, 2017 through September 25, 2017;
 - e. By letter dated November 29, 2017, pursuant to Pa.R.D.E. 221(g)(1), ODC demanded that Respondent produce records required to be maintained by Rule of Professional Conduct 1.15(c) within 10 days; Respondent acknowledged receipt of the letter,

but failed to respond or otherwise provide the requested records;
and

- f. Respondent's actions constituted manifest and continuing violations of the Rules of Professional Conduct and Rules of Disciplinary Enforcement and her continued practice of law constituted a continuing threat of immediate and substantial public and private harm as set forth in Pa.R.D.E. 208(f), warranting her temporary suspension.

8. On December 22, 2017, Respondent was provided with a copy of the ETS Petition *via* electronic mail.

9. On December 29, 2017, ODC Auditor-Investigator Lowell Kratzer attempted to personally serve Respondent with a copy of the ETS Petition by visiting Respondent's office and residence addresses and also the residence of Respondent's mother; a copy of the ETS Petition was left at Respondent's office and residence.

10. On January 2, 2018, ODC provided Respondent with a copy of the ETS Petition *via* first-class mail sent to Respondent's office and residence addresses.

11. Neither the electronic nor first-class mailings were returned.

12. On January 11, 2018, this Honorable Court issued upon Respondent a Rule to Show Cause why she should not be placed on temporary suspension and directed her to:

- a. File any response within ten days and to serve a copy of the response upon ODC;
- b. Provide to ODC within ten days:
 - i. A list of the names and addresses of all clients and other entities she is currently representing or with respect to which she is a fiduciary, showing the dates, amount and circumstances of the entrustment and the current balance thereof, as well as the banks and account numbers in which such funds are currently being maintained; and
 - ii. All records requested by ODC pursuant to Pa.R.D.E. 221(g)(1) by letter dated November 29, 2017.

A true and correct copy of the Order and Rule to Show Cause is attached as ODC-2.

13. By Order dated January 31, 2018, effective March 2, 2018, in absence of a response to the Court's Rule to Show Cause why Respondent should not be placed on temporary suspension, this Honorable Court:

- a. Placed Respondent on temporary suspension until further definitive action by the Court;
- b. Ordered Respondent to comply with the provisions of Pa.R.D.E. 217;
- c. Directed that the President Judge of the Court of Common Pleas of Dauphin County enter such orders as may be necessary to protect the rights of Respondent's clients or fiduciary entities with which she is involved;
- d. Ordered all financial institutions in which Respondent holds fiduciary funds to freeze the accounts pending further action; and
- e. Advised that Respondent's right to seek dissolution or amendment of the order or request accelerated disposition of the charges underlying the order pursuant to Pa.R.D.E. 208(f)(6) was specifically preserved.

A true and correct copy of the January 31, 2018, Order is attached as ODC-3.

14. On January 22, 2018, the United States District Court for the Eastern District of Pennsylvania issued upon Respondent a Rule to Show Cause why she should not be suspended from the practice of law before that court.

15. By Order dated March 15, 2018, in absence of a response to the Court's Rule to Show Cause, the United States District Court for the Eastern District of

Pennsylvania suspended Respondent from the practice of law, effective August 25, 2017, until further Order of Court.

16. Respondent has not participated in proceedings before Client Security.

17. Client Security has adjudicated one claim against Respondent, resulting in an award of \$5,001.01, on which \$2,005.07 interest has accrued due to Respondent's failure to pay.

18. To date, Respondent has not provided ODC with any of the records this Honorable Court directed her to provide pursuant to its January 11, 2018 Rule to Show Cause.

19. To date, Respondent has not sought dissolution or amendment of the January 31, 2018 Order or requested accelerated disposition of the charges underlying the Order pursuant to Pa.R.D.E. 208(f)(6).

20. To date, Respondent has not filed with the Disciplinary Board a verified statement and served a copy on ODC as required by Pa.R.D.E. 217(e), *inter alia*, setting forth the residence or address where communication to her may be directed and averring that she has fully complied with the provisions of the January 31, 2018 Order.

21. Respondent has not communicated with ODC in any manner subsequent to her acknowledgement of receipt of ODC's November 29, 2017 letter pursuant to Pa.R.D.E. 221(g)(1).

22. Issuance of a Rule to Show Cause is appropriate under the provisions of Pa.R.D.E. 208(f)(8)(i), (ii), and (vi).

23. Respondent's conduct demonstrates her wholesale disregard for her professional obligations and this Honorable Court.

PRAYER FOR RELIEF

WHEREFORE, ODC respectfully requests that your Honorable Court issue a Rule to Show Cause upon Respondent why an order of disbarment should not be entered pursuant to Pa.R.D.E. 208(f)(8).

Respectfully submitted,

OFFICE OF DISCIPLINARY COUNSEL

Thomas J. Farrell
Chief Disciplinary Counsel

By: Kristin A. Wells

Kristin A. Wells
Disciplinary Counsel
Attorney Registration No. 312080
Pennsylvania Judicial Center
601 Commonwealth Avenue, Suite 5800
P.O. Box 62675
Harrisburg, PA 17106

VERIFIED STATEMENT

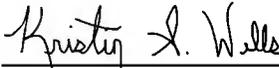
I, Kristin A. Wells, Disciplinary Counsel, state under penalties provided in 18 Pa.C.S. § 4904 (unsworn falsification to authorities) that:

I am a Disciplinary Counsel of the Disciplinary Board of the Supreme Court of Pennsylvania assigned to prosecute this matter pursuant to the Pennsylvania Rules of Disciplinary Enforcement;

I am authorized to make this verified statement; and

The facts contained in the attached Petition for Issuance of a Rule to Show Cause why an Order of Disbarment should not be Issued Pursuant to Pa.R.D.E. 208(f)(8) are true and correct to the best of my knowledge, information and belief.

7/18/2023
Date



Kristin A. Wells
Disciplinary Counsel

Paul J. Killion
Chief Disciplinary Counsel
Pennsylvania Judicial Center
601 Commonwealth Avenue
Suite 2700
P.O. Box 62495
Harrisburg, PA 17106
(717) 783-0990
Fax (717) 783-4963

THE DISCIPLINARY BOARD
OF THE
SUPREME COURT OF PENNSYLVANIA



Paul J. Burgoyne
Deputy Chief Disciplinary Counsel

DISCIPLINARY COUNSEL
IN CHARGE OF
DISTRICT OFFICES
(I) Anthony P. Sodroski
(II) Raymond S. Wierciszewski
(III) Ramona Mariani
(IV) Angelea A. Mitas

CHIEF DISCIPLINARY COUNSEL

www.padisciplinaryboard.org

January 2, 2018

Prothonotary
Supreme Court of Pennsylvania
Western District Office
801 City-County Building
Pittsburgh, PA 15219

RECEIVED
1/3/2018
PA Disciplinary Board
Office of the Secretary

Attention: John A. Vaskov, Esquire
Deputy Prothonotary

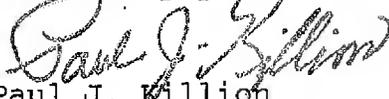
Re: Office of Disciplinary Counsel v.
Megan Anne Kerrigan
Petition for Emergency Temporary
Suspension Order and Related Relief
Attorney Registration No. 307279

Dear Mr. Vaskov:

Pursuant to Rule 104(c), Pa.R.D.E., please find Disciplinary Counsel's Petition for Emergency Temporary Suspension Order and Related Relief, Pursuant to Rule 208(f)(1), Pa.R.D.E.

Additional copies are being served as indicated below.

Very truly yours,


Paul J. Killion
Chief Disciplinary Counsel

Enclosures

cc: (w/encl.)

Julia M. Frankston-Morris, Esquire, Secretary,
The Disciplinary Board
Megan Anne Kerrigan, Esquire
Paul J. Burgoyne, Deputy Chief Disciplinary Counsel

IN THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, : No. Disciplinary Docket
Petitioner : Docket No.
 :
v. : Board File No. C3-17-551
 :
 :
MEGAN ANNE KERRIGAN, : Attorney Reg. No. 307279
Respondent :
 : (Dauphin County)

**PETITION FOR EMERGENCY TEMPORARY SUSPENSION
AND RELATED RELIEF PURSUANT TO Pa.R.D.E. 208 (D)(1) & (5)**

TO THE HONORABLE, THE CHIEF JUSTICE AND JUSTICES OF THE SUPREME
COURT OF PENNSYLVANIA:

Office of Disciplinary Counsel (hereinafter "Petitioner"), by Paul J. Killion, Esquire, Chief Disciplinary Counsel, and by Kristin Wells, Esquire, Disciplinary Counsel, files this Petition for Emergency Temporary Suspension and Related Relief, pursuant to Pennsylvania Rules of Disciplinary Enforcement ("Pa.R.D.E.") 208(f) and Disciplinary Board Rules § 91.151, and in support thereof states:

1. Petitioner, whose principal office is situated at Pennsylvania Judicial Center, 601 Commonwealth Ave., Suite 2700, P.O. Box 62485, Harrisburg, Pennsylvania, 17106 is invested, pursuant to Pa.R.D.E. 207, with the power and duty to investigate all matters involving alleged misconduct of an attorney admitted to practice law in the Commonwealth of Pennsylvania and to prosecute all disciplinary proceedings brought in accordance with the various provisions of the aforesaid Enforcement Rules.

2. Respondent, Megan Anne Kerrigan, was born on October 6, 1968, and was admitted to practice law in the Commonwealth of Pennsylvania on November 9, 2009. Respondent's Attorney Registration No. is 307279. Her registered address is 260 North Street, 1st Floor, Harrisburg, Pennsylvania 17101. Respondent is currently on administrative

suspension for failure to submit her annual fee form. Respondent is subject to the disciplinary jurisdiction of the Disciplinary Board of the Supreme Court.

3. On July 14, 2017, the Pennsylvania Lawyers Fund for Client Security ("Client Security") received notification from PNC Bank that an item in the amount of \$12,468.88 had been presented against Respondent's IOLTA account, creating a \$4,476.83 shortfall in the account.

4. The item was an Automated Clearing House ("ACH") transaction that appears to be an attempt by a bank or credit card to receive payment.

5. By letter dated July 18, 2017, Client Security issued an inquiry letter to Respondent requesting an explanation and certain documentation relating to the report.

6. Respondent failed to respond to Client Security.

7. Client Security subsequently received two additional reports for the \$12,468.88 item.

8. Client Security also received two notifications that an item in the amount of \$13,834.68 had been presented against Respondent's IOLTA account, creating a shortfall in the account.

9. This item was also an ACH transaction that appears to originate from a bank or credit card.

10. By letter dated August 14, 2017, Client Security advised Respondent that if she did not respond to its July 18th inquiry within five business days, the matter would be referred to ODC.

11. Respondent failed to respond to Client Security, and the matter was referred to ODC for further investigation.

12. Following the referral, 13 additional overdraft notifications were received for Respondent's IOLTA account.

13. In each instance, the item that was presented against the account was an ACH transaction.

14. Specifically, the following overdraft notifications were received from PNC Bank for Respondent's IOLTA account:

1) September 15, 2017 - \$16,498.38 item causing a \$16,347.64 shortfall;

- 2) September 18, 2017 - \$900.00 item causing a \$749.25 shortfall;
- 3) September 27, 2017 - \$223.90 item causing a \$223.90 shortfall;
- 4) October 2, 2017 - \$1,250.00 item causing a \$495.08 shortfall;
- 5) October 5, 2017 - \$700.00 item causing a \$700.00 shortfall;
- 6) October 6, 2017 - \$1,255.05 item causing a \$1,255.05 shortfall;
- 7) October 11, 2017 - \$213.25 item causing a \$213.05 shortfall;
- 8) October 12, 2017 - \$700.00 item causing a \$700.00 shortfall;
- 9) October 16, 2017 - \$2,163.25 item causing a \$2,163.25 shortfall;
- 10) October 19, 2017 - \$213.25 item causing a \$213.25 shortfall;
- 11) October 20, 2017 - \$1,950.00 item causing a \$1,950.00 shortfall;
- 12) December 5, 2017 - \$25.00 item causing a \$25.00 shortfall;
- 13) December 6, 2017 - \$2.00 item causing a \$2.00 shortfall; and
- 14) December 11, 2017 - \$2.00 item causing a \$2.00 shortfall.

15. ODC issued a subpoena *deuces tecum* to PNC Bank for Respondent's 2017 IOLTA account records.

16. Respondent is the only signatory on the IOLTA account.

17. The IOLTA records showed that Respondent was regularly funneling large sums of money, totaling approximately \$1,000,000.00 over the course of a one year period, through her IOLTA account.

18. Deposited funds were regularly withdrawn promptly through serial transactions such that the daily balance remained low.

19. The funds were deposited into the IOLTA account by ACH transactions and withdrawn either through ACH transactions or transfers to Respondent's operating account.

20. ODC has been unable to procure information from either Respondent or PNC Bank that is sufficient to identify the source of the ACH transactions.

21. Based on this information, ODC issued a subpoena *deuces tecum* to PNC Bank for Respondent's 2017 operating account records.

22. Respondent is the only signatory on the operating account.

23. The operating account records demonstrate that Respondent is funneling money for Synergy Attorney Services, LLC ("SAS"), a national foreclosure defense

attorney service firm for which Respondent serves as a Managing Attorney.¹

24. SAS is owned by non-attorneys.

25. According to the SAS website, it offers foreclosure defense and mortgage mitigation from a "team of highly qualified attorneys."

26. Regular withdrawals in the multiple thousands of dollars are made from Respondent's operating account directed to SAS for "Backend Processing."

27. Over the course of eight months, Respondent paid approximately \$540,575.00 to SAS for "Backend Processing."

28. Numerous deposits in whole dollar amounts have been posted to Respondent's operating account for numerous individuals suspected to be SAS clients.

29. Over the course of nine months, Respondent deposited approximately \$97,615.83 into her operating account from individuals suspected to be SAS clients, as detailed below.

30. Specifically, on the following dates, Respondent deposited funds attributable to the listed individuals:

- 1) January 4, 2017 - \$900.00 from Wanda Hickerson;
- 2) January 4, 2017 - \$500.00 from Jeffrey Flint;
- 3) January 6, 2017 - \$500.00 from Gregory Young;
- 4) January 9, 2017 - \$1,250.00 from Sherry Pridgen;
- 5) January 9, 2017 - \$700.00 from Tamara Richards;
- 6) January 10, 2017 - \$550.00 from Jane Jones;
- 7) January 11, 2017 - \$387.50 from Deborah Kocsis;
- 8) January 18, 2017 - \$800.00 from Henry Danczyk;
- 9) January 18, 2017 - \$550.00 from Jason Styrwoll;
- 10) January 18, 2017 - \$775.00 from Debra Hollup;
- 11) January 27, 2017 - \$775.00 from LaTasha Sargent;
- 12) February 3, 2017 - \$550.00 from Jeffrey Flint;
- 13) February 3, 2017 - \$500.00 from Calvin Harris;
- 14) February 6, 2017 - \$550.00 from Jonathan Green;

¹ Despite her Administrative Suspension, Respondent remains listed on the SAS website as a "Managing Attorney."

- 15) February 6, 2017 - \$150.00 from Wanda Hickerson;
- 16) February 6, 2017 - \$1,500.00 from Donna Nyberg;
- 17) February 7, 2017 - \$700.00 from Tamara Richards;
- 18) February 8, 2017 - \$275.00 from Jane Jones;
- 19) February 8, 2017 - \$700.00 from Francis Huate;
- 20) February 9, 2017 - \$700.00 from Louis Thomas;
- 21) February 14, 2016 - \$387.50 from Deborah Kocsis;
- 22) February 14, 2016 - \$500.00 from Larry D. Jones;
- 23) February 16, 2016 - \$1,100.00 from Myriam V. Arocho;
- 24) February 16, 2017 - \$550.00 from Jason Styrwoll;
- 25) February 16, 2017 - \$900.00 from Charles Andrew Zajatz;
- 26) February 17, 2017 - \$900.00 from Fannie Terry;
- 27) February 18, 2017 - \$800.00 from Henry Danczyk;
- 28) February 18, 2017 - \$550.00 from Jason Styrwoll;
- 29) February 22, 2017 - \$275.00 from Jane Jones;
- 30) February 23, 2017 - \$900.00 from Huey Young;
- 31) February 28, 2017 - \$625.00 from Frances Kelsey;
- 32) March 1, 2017 - \$775.00 from Latasha Cirwithen;
- 33) March 2, 2017 - \$450.00 from Elnora White;
- 34) March 3, 2017 - \$550.00 from Jeffrey Flint;
- 35) March 3, 2017 - \$600.00 from Vicki Stevens;
- 36) March 3, 2017 - \$1,400.00 from Edgar Oyola;
- 37) March 6, 2017 - \$600.00 from Asa Pronovost;
- 38) March 6, 2017 - \$900.00 from David Morgan;
- 39) March 6, 2017 - \$550.00 from Jonathan Green;
- 40) March 6, 2017 - \$625.00 from Frances Kelsey;
- 41) March 7, 2017 - \$77.50 from Timothy Lawlor;
- 42) March 7, 2017 - \$1,000.00 from Donna Nyberg;
- 43) March 8, 2017 - \$1,400.00 from Amber Burke Johnson;
- 44) March 9, 2017 - \$700.00 from Louis Thomas;
- 45) March 9, 2017 - \$103.33 from Sharon Bowie Robinson;

- 46) March 15, 2017 - \$600.00 from Vicki Thiemann;
- 47) March 15, 2017 - \$100.00 from Charles Zajatz;
- 48) March 16, 2017 - \$1400.00 from Dean Rulapaugh;
- 49) March 16, 2017 - \$800.00 from Henry Dancyk;
- 50) March 16, 2017 - \$775.00 from Debra Hollup;
- 51) March 20, 2017 - \$400.00 from Charles Zajatz;
- 52) March 22, 2017 - \$600.00 from Alan Dobbs;
- 53) March 22, 2017 - \$700.00 from Robert Davis;
- 54) March 22, 2017 - \$1,400.00 from Suzette Burton;
- 55) March 22, 2017 - \$900.00 from Denise Rork;
- 56) March 23, 2017 - \$550.00 from Huey Yong;
- 57) March 27, 2017 - \$625.00 from Ronald Cole;
- 58) March 28, 2017 - \$1,250.00 from Jim Edelen;
- 59) March 28, 2017 - \$1,250.00 from Anjanette Hall;
- 60) March 30, 2017 - \$20.00 from Weltman's Liquor;
- 61) April 3, 2017 - \$550.00 from Elnora White;
- 62) April 4, 2017 - \$550.00 from Jonathan Green;
- 63) April 4, 2017 - \$1,400.00 from Paul Dersam;
- 64) April 4, 2017 - \$1,100.00 from Amanda Schmiedlin;
- 65) April 4, 2017 - \$775.00 from Frances Kelsey;
- 66) April 7, 2017 - \$1,100.00 from Donald Rakus;
- 67) April 10, 2017 - \$600.00 from Vicki Thiemann;
- 68) April 11, 2017 - \$400.00 from Mark Locken ;
- 69) April 13, 2017 - \$800.00 from Henry Danczyk;
- 70) April 17, 2017 - \$700.00 from Dean Rulapaugh;
- 71) April 17, 2017 - \$500.00 from Charles Zajatz;
- 72) April 20, 2017 - \$1,000.00 from Mark Locken;
- 73) April 20, 2017 - \$625.00 from Fay Freeman;
- 74) April 21, 2017 - \$775.00 from Janis Campagnone;
- 75) April 27, 2017 - \$550.00 from Huey Young;
- 76) May 2, 2017 - \$900.00 from Douglas Monroe;

- 77) May 4, 2017 - \$550.00 from Jonathan Green;
- 78) May 4, 2017 - \$1,100.00 from Scott Homan;
- 79) May 5, 2017 - \$1,100.00 from Jeffrey Cornier;
- 80) May 5, 2017 - \$550.00 from Amanda Schmiedlin;
- 81) May 5, 2017 - \$550.00 from Donald Rakus;
- 82) May 9, 2017 - \$550.00 from Sylvia Yager;
- 83) May 10, 2017 - \$387.50 from Lenora Polk;
- 84) May 10, 2017 - \$600.00 from Vicki Thiemann ;
- 85) May 15, 2017 - \$1,100.00 from Betty Painter;
- 86) May 15, 2017 - \$700.00 from Dean Rulapaugh;
- 87) May 15, 2017 - \$625.00 from Kevin Anderson;
- 88) May 18, 2017 - \$775.00 from Janis Campagnone;
- 89) May 23, 2017 - \$625.00 from Paul Freeland;
- 90) May 25, 2017 - \$550.00 from Huey Young;
- 91) May 25, 2017 - \$550.00 from Sylvia Yager;
- 92) June 1, 2017 - \$550.00 from Douglas Monroe;
- 93) June 1, 2017 - \$775.00 from Jennifer Estrada;
- 94) June 1, 2017 - \$1,400.00 from Travis Oldham;
- 95) June 6, 2017 - \$550.00 from Jonathan Green;
- 96) June 7, 2017 - \$550.00 from Amanda Schmiedlin;
- 97) June 8, 2017 - \$300.00 from Vicki Steven;
- 98) June 12, 2017 - \$387.50 from Lenora Polk;
- 99) June 12, 2017 - \$550.00 from Charles Zajatz;
- 100) June 12, 2017 - \$775.00 from Jennifer Estrada;
- 101) June 12, 2017 - \$550.00 from Shatara Prince;
- 102) June 16, 2017 - \$300.00 from Vicki Thiemann;
- 103) June 16, 2017 - \$700.00 from Dean Rulapaugh;
- 104) June 19, 2017 - \$775.00 from Jennifer Estrada;
- 105) June 20, 2017 - \$775.00 from Jim Campagnone;
- 106) June 20, 2017 - \$1,100.00 from David Rothacher;
- 107) June 23, 2017 - \$550.00 from Charles Zajatz;

- 108) June 26, 2017 - \$550.00 from Patty Rice;
- 109) June 29, 2017 - \$87.50 from Myriam Arocho;
- 110) June 29, 2017 - \$550.00 from Douglas Monroe;
- 111) June 29, 2017 - \$550.00 from Huey Young;
- 112) June 30, 2017 - \$900.00 from Travis Oldham;
- 113) July 3, 2017 - \$250.00 from Velma Seward-Burton;
- 114) July 6, 2017 - \$400.00 from Helen Koss;
- 115) July 6, 2017 - \$800.00 from Mae Allen;
- 116) July 10, 2017 - \$397.50 from Lenora Polk;
- 117) July 10, 2017 - \$155.00 from Janis Campagnone;
- 118) July 11, 2017 - \$550.00 from Donald Rakus;
- 119) July 11, 2017 - \$600.00 from Vicki Steven;
- 120) July 11, 2017 - \$25.00 from Mark Straka;
- 121) July 13, 2017 - \$1,500.00 from Donald Johnson;
- 122) July 17, 2017 - \$250.00 from Charles Zajatz;
- 123) July 17, 2017 - \$950.00 from Oscar Lopez;
- 124) July 17, 2017 - \$700.00 from Dean Rulapaugh;
- 125) July 19, 2017 - \$500.00 from Kathleen Kaskey;
- 126) July 20, 2017 - \$500.00 from Helen Koss;
- 127) July 24, 2017 - \$750.00 from Kathleen Kaskey;
- 128) July 25, 2017 - \$100.00 from Phyllis Woods;
- 129) July 27, 2017 - \$50.00 from Elfina McCray;
- 130) July 27, 2017 - \$1,000.00 from David Smillie;
- 131) July 28, 2017 - \$550.00 from Huey Young;
- 132) August 2, 2017 - \$550.00 from Douglas Monroe;
- 133) August 3, 2017 - \$625.00 from Jerome Click;
- 134) August 3, 2017 - \$775.00 from Dychan Roberson;
- 135) August 4, 2017 - \$625.00 from David Green;
- 136) August 4, 2017 - \$800.00 from Mae Allen;
- 137) August 9, 2017 - \$387.50 from Lenora Polk;
- 138) August 9, 2017 - \$300.00 from Walter Kiskaden;

- 139) August 10, 2017 - \$475.00 from Jerome Click;
- 140) August 14, 2017 - \$1,000.00 from Donald Johnson;
- 141) August 14, 2017 - \$550.00 from Sandra Graft;
- 142) August 24, 2017 - \$900.00 from Robert Walsh;
- 143) August 28, 2017 - \$740.00 from Vernell Roberson;
- 144) August 31, 2017 - \$550.00 from Douglas Monroe;
- 145) September 1, 2017 - \$35.00 from Vernell Roberson;
- 146) September 11, 2017 - \$387.50 from Lenora Polk;
- 147) September 14, 2017 - \$1,000.00 from Donald Johnson; and
- 148) September 25, 2017 - \$625.00 from Sonya Stay.

31. Given that refunds were issued from Respondent's operating account to several of the above-named individuals, it is believed that these funds were retainer fees that should have been held in trust.

32. Numerous withdrawals have been posted to Respondent's operating account for individuals suspected to be SAS clients for "Synergy Attorney Services Refund."

33. Over the course of nine months, approximately \$33,503.39 was paid out of Respondent's operating account to individuals suspected to be SAS clients.

34. Specifically, on the following dates, payments to the following individuals were posted:

- 1) January 17, 2017 - \$477.50 to Jeremy Deeken;
- 2) January 23, 2017 - \$926.25 to James Thomas;
- 3) January 25, 2017 - \$1,500.00 to Angela Huber;
- 4) January 31, 2017 - \$1,100.00 to Jimmy Sepeda;
- 5) February 1, 2017 - \$375.00 to Johnny Johnson;
- 6) February 2, 2017 - \$506.25 to Murianda Ruffin;
- 7) February 6, 2017 - \$200.00 to Jerome Townsend;
- 8) February 6, 2017 - \$2,456.25 to Peter Benotti;
- 9) February 21, 2017 - \$775.00 to Michael Ricardo Gray, Jr.;
- 10) February 22, 2017 - \$550.00 to Bobby Campbell;
- 11) February 23, 2017 - \$700.00 to Ryan Taylor;
- 12) February 27, 2017 - \$1,250 to Diane Jones;

- 13) March 6, 2017 - \$3,677.00 to Ashley Ahlawat;
- 14) March 27, 2017 - \$700.00 to Elasbao Baptista;
- 15) April 4, 2017 - \$2,800.00 to Shawna Brown;
- 16) April 10, 2017 - \$625.00 to LaTonda Green;
- 17) April 10, 2017 - \$625.00 to Melvin Jemerson;
- 18) April 11, 2017 - \$700.00 to Suzette Burton;
- 19) April 19, 2017 - \$354.50 to Donn Costello;
- 20) April 20, 2017 - \$900.00 to Emile Barton;
- 21) April 20, 2017 - \$366.67 to Beverly Campbell;
- 22) April 21, 2017 - \$457.50 to Murianda Ruffin;
- 23) April 28, 2017 - \$478.50 to Maria Gracia;
- 24) June 12, 2017 - \$1,301.67 to Matthew Giaba;
- 25) June 12, 2017 - \$450.00 to Keith Stone;
- 26) June 13, 2017 - \$393.80 to Donn Costello;
- 27) June 30, 2017 - \$310.00 to Joseph Chism;
- 28) July 12, 2017 - \$337.50 to Teresa Newbury;
- 29) July 18, 2017 - \$450.00 to Nadia Anwar;
- 30) July 18, 2017 - \$250.00 to Nadia Anwar;
- 31) July 19, 2017 - \$900.00 to Jacqueline Grant;
- 32) July 31, 2017 - \$500.00 to Silvia Bickford;
- 33) August 7, 2017 - \$403.00 to Murianda Ruffin;
- 34) August 7, 2017 - \$330.00 to Jeffrey Cormier;
- 35) August 7, 2017 - \$750.00 to Abel Herrera;
- 36) August 9, 2017 - \$422.50 to Don Costello;
- 37) August 21, 2017 - \$1,000.00 to William Ridenour;
- 38) August 23, 2017 - \$242.00 to Don Costello;
- 39) August 28, 2017 - \$200.00 to Anna Harrington;
- 40) August 28, 2017 - \$450.00 to Alice Wells;
- 41) September 1, 2017 - \$302.50 to Don Costello;
- 42) September 7, 2017 - \$650.00 to Matthew DeClue;
- 43) September 11, 2017 - \$100.00 to Kevin Muhammad ;

- 44) September 19, 2017 - \$450.00 to Carrie Hess;
- 45) September 20, 2017 - \$310.00 to William Maylor; and
- 46) September 21, 2017 - \$500.00 to David Green.

35. Respondent's failure to cooperate with ODC has rendered it impossible to determine what legal services, if any, she has actually performed for the individuals whose funds she possessed.

36. By Pennsylvania Supreme Court Order dated July 26, 2017, effective August 25, 2017, Respondent was placed on Administrative Suspension for failure to complete her 2017-2018 Annual Attorney Registration.

37. Accordingly, all monetary transactions through Respondent's IOLTA and/or operating account after August 25, 2017, that involved client funds were in violation of Pa.R.D.E. 217(j)(4)(x).

38. To date, Respondent has failed to submit a Verified Statement, as required by Pa.R.D.E. 217(e).

39. Based on this information, by letter dated November 29, 2017, a copy of which is attached as "Exhibit A," sent to Respondent *via* email, this Office requested, pursuant to Pa.R.D.E. 221(g)(1), records required to be maintained by RPC 1.15(c), representation records for the individuals concerning whom Respondent accepted or disbursed funds, and Respondent's position as to various allegations.

40. Respondent replied acknowledging receipt of the letter.

41. The records requested pursuant to Pa.R.D.E. 221(g)(1) were due within 10 business days of Respondent's receipt of the letter, by December 12, 2017.

42. To date, Respondent has not provided the requested documents or further communicated with ODC.

43. Petitioner believes, and therefore avers, that by virtue of the aforesaid acts, Respondent has engaged in manifest and continuing violations of the Rules of Professional Conduct and Rules of Disciplinary Enforcement, including RPC 1.15(b), RPC 1.15(i), RPC 1.15(j), RPC 1.15(k), RPC 1.15(l), RPC 1.15(m), RPC 5.5(a), RPC 7.1; RPC 8.1(b); Pa.R.D.E. 217(e), Pa.R.D.E. 217(j)(2), Pa.R.D.E. 217(j)(4)(i), (ii), (iii), (iv), (v), (ix), (x), Pa.R.D.E. 219(a) & (d), and Pa.R.D.E. 221(g).

44. Petitioner believes, and therefore avers, that Respondent's continued

practice of law constitutes a continuing threat of immediate and substantial public and private harm as set forth in Pa.R.D.E. 208(f).

45. While Respondent is currently administratively suspended, she is readily able to regain active status upon submission of her 2017-2018 Annual Attorney Registration.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that your Honorable Court:

a. Order Respondent to immediately prepare and deliver to Petitioner a list of the names and addresses of all clients and other entities she is currently representing or in which she is a fiduciary, showing the dates, amounts and circumstances of the entrustment and current balance thereof, as well as the banks and account numbers in which such funds are currently maintained;

b. Order Respondent to, within ten days, provide Petitioner with the records requested pursuant to Pa.R.D.E. 221(g)(1); and

c. Issue a rule upon Respondent to show cause why she should not be placed on temporary suspension from the practice of law, pursuant to Pa.R.D.E. 208(f)(1), returnable at a date, time and place certain, and with a response to the allegations set forth herein.

AND FURTHER, that after due consideration of any response made by Respondent and further proceedings held in accordance with Pa.R.D.E. 208(f)(1), this Honorable Court grant the following additional relief:

a. Order that Respondent be suspended in accordance with Pa.R.D.E. 208(f)(2), as a matter of "public discipline" as that term is used in Pa.R.D.E. 402, pertaining to confidentiality, and that she comply with Pa.R.D.E. 217;

b. Order the President Judge of the Court of Common Pleas of Dauphin County, in accordance with Pa.R.D.E. 217(g), to take such further action and make such further orders as may appear necessary to protect the rights and interests of Respondent's clients or fiduciary entities with which she is involved;

c. Order that all bank accounts held by Respondent or controlled by her,

containing fiduciary funds, to include her PNC Bank IOLTA account ending in 3495 and PNC Bank operating account ending in 8149, be frozen until further action by a court of appropriate jurisdiction; and

d. Grant such other relief as may be deemed appropriate and necessary by your Honorable Court.

Respectfully Submitted,

OFFICE OF DISCIPLINARY COUNSEL,

Paul J. Killion,
Chief Disciplinary Counsel

Date: 21 December 2017

By: _____

Kristin A. Wells
Kristin A. Wells

Disciplinary Counsel, District III
Attorney Registration No. 312080

Paul J. Kilton
Chief Disciplinary Counsel

Paul J. Burgoyne
Deputy Chief Disciplinary Counsel

District III Office
PA Judicial Center
601 Commonwealth Avenue, Suite 5800
P.O. Box 62675
Harrisburg, PA 17106
(717) 772-8572
FAX (717) 772-7483

THE DISCIPLINARY BOARD
OF THE
SUPREME COURT OF PENNSYLVANIA



OFFICE OF DISCIPLINARY COUNSEL
www.padisciplinaryboard.org

November 29, 2017

Disciplinary Counsel-in-Charge
Ramona M. Mariani

Disciplinary Counsel
Anthony A. Czuchnicki
Suzy S. Moore
Kristin A. Wells

PERSONAL AND CONFIDENTIAL

PERSONAL SERVICE TO BE ATTEMPTED

Megan Kerrigan
Kerrigan Legal
260 North Front St., 1st Floor
Harrisburg, PA 17101

Megan Kerrigan
1611 North 2nd St.
Harrisburg, PA 17102

Re: Demand for Records
(File No. C3-17-551)

Dear Ms. Kerrigan:

This Office has opened a complaint against you on its own motion based upon overdraft notifications we received for your IOLTA account and your failure to respond to inquiry from the Pennsylvania Lawyers Fund for Client Security (Client Security).

Pursuant to Rule 221(g)(1), Pennsylvania Rules of Disciplinary Enforcement (Pa.R.D.E.), this Office requests that you provide within ten (10) business days of personal service of this letter upon you or delivery of the letter to an employee, agent or other responsible person at your office, the following records, as required to be maintained by Pa. RPC 1.15, from January 1, 2017, to the present time:

For PNC Bank IOLTA Account, account no. [REDACTED]-3495:

1. Complete documentation for all ACH transactions (debits and credits), including but not limited to, the bank account holder or merchant name attributable to each transaction, the client matter to which each transaction is attributable, and the purpose of each transaction;
2. Explanation for each transfer to PNC Bank Account, account no. [REDACTED]-8149, to include but not limited to, the client matter to which each transfer is attributable and the purpose of each transfer;

Exhibit A

3. Check register and/or separately maintained ledger for the account in question, which shall include the payee, date, purpose and amount of each check, withdrawal and transfer, the payor, date, and amount of each deposit, and the matter involved for each transaction;

4. If the account is used to hold funds of more than one client, then provide an individual ledger for each trust client, showing the source, amount and nature of all funds received from or on behalf of the client, the description and amounts of charges or withdrawals, the names of all persons or entities to whom such funds were disbursed, and the dates of all deposits, transfers, withdrawals and disbursements;

5. Your monthly trial balance(s) of the individual client trust ledgers, along with a monthly reconciliation for each fiduciary account and a total trial balance for the IOLTA account at issue; and

6. Corresponding Fee/Retainer Agreements and full accountings for the clients whose money you held in the account during this time period.

For PNC Bank Account, account no. [REDACTED]-8149:

1. Complete documentation for all ACH transactions (debits and credits), including but not limited to, the bank account holder or merchant name attributable to each transaction, the client matter, if any, to which each transaction is attributable, and the purpose of each transaction;

2. Complete documentation for all "Fed Wire" transactions (debits and credits), including but not limited to, the source (for credits) or recipient (for debits) of each transaction, the client matter, if any, to which each transaction is attributable, and the purpose of each transaction;

3. Explanation for each payment to Synergy Attorney Services, LLC (SAS), to include but not limited to, a detailed explanation of the services you receive from SAS, a copy of your contract for services with SAS, and copies of invoices or other demand for payment to which each payment is attributable;

4. Fee/Retainer Agreements or other associated agreement/contract, individual client ledgers, and full accountings for the following individuals:

- 1) Wanda Hickerson;
- 2) Jeffrey Flint;
- 3) Gregory Young;
- 4) Sherry Pridgen;
- 5) Tamara Richards;
- 6) Jane Jones;

- 7) Jeremy Deeken;
- 8) James Thomas;
- 9) Angela Huber;
- 10) Jimmy Sepeda;
- 11) Murianda Ruffin;
- 12) Calvin Harris;
- 13) Jonathan Green;
- 14) Wanda Hickerson;
- 15) Donna Nyberg;
- 16) Jerome Townsend;
- 17) Michael Licari;
- 18) Peter Benotti;
- 19) James Jones;
- 20) Francis Huate;
- 21) Louis Thomas;
- 22) Deborah Kocsis;
- 23) Jason Styrwooll;
- 24) Charles Andrew Zajatz;
- 25) Fannie Terry;
- 26) Henry Danaczyk;
- 27) Michael Rocardo Gray, Jr.
- 28) Booby Campbell;
- 29) Huey Young
- 30) Ryan Taylor;
- 31) Diane Jones;
- 32) Frances Kelsey;
- 33) LaTasha Sargent;
- 34) Elnora White;
- 35) Vicki Steven/Thiemann;

- 36) Edgar Oyola;
- 37) Asa Provnost;
- 38) David Morgan;
- 39) Frances Kelsey;
- 40) Timothy Lawlor;
- 41) Amber Burke Johnson;
- 42) Sharon Bowie Robinson;
- 43) Dean Rulapaugh;
- 44) Debra Hollup;
- 45) Alan Dobbs;
- 46) Robert Davis;
- 47) Suzette Burton;
- 48) Denise Rork;
- 49) Brandy Rock;
- 50) Ronald Cole;
- 51) Jim Edelen;
- 52) Anjanette Hall;
- 53) Weltman's Liquor;
- 54) Elnora White;
- 55) Paul Dersam;
- 56) Amanda Schmiedlin;
- 57) Shawna Brown;
- 58) Donald Rakus;
- 59) LaTonda Green;
- 60) Melvin Jemerson;
- 61) Mark Locken;
- 62) Donn Costello;
- 63) Fay Freeman;
- 64) Emile Barton and/or Schmaffmeirs;

- 65) Beverly Campbell;
- 66) Danielle Moore;
- 67) Janis/Jim Campagone;
- 68) Maria Garcia;
- 69) Douglas Monroe;
- 70) Scott Homan;
- 71) Jeffrey Cornier;
- 72) Sylvia Yager;
- 73) Lenora Polk;
- 74) Betty Painter;
- 75) Kevin Anderson;
- 76) Paul Freeland;
- 77) Jennifer Estrada;
- 78) Travis Oldham;
- 79) Shatara Prince;
- 80) Mona Giaba
- 81) Keith Stone;
- 82) David Rothacher;
- 83) Patty Rice;
- 84) Myriam Arocho;
- 85) Joseph Chism;
- 86) Velma Seward-Burton;
- 87) Helen Koss;
- 88) Mac Allen;
- 89) Mark Straka;
- 90) Teresa Newbury;
- 91) Oscar Lopez;
- 92) Nadia Anwar;
- 93) Kathleen Kaskey;

- 94) Jacqueline Grant;
- 95) Phyllis Woods;
- 96) Elfina McCray;
- 97) David Smillie;
- 98) Silvia Bickford;
- 99) Jerome Click;
- 100) Dychan Roberson;
- 101) David Green;
- 102) Jeffrey Cormier;
- 103) Abel Herrera;
- 104) Ron Chatterder;
- 105) Victor Vestimar;
- 106) Walter Kiskaden;
- 107) Donald Johnson;
- 108) Sandra Graft;
- 109) William Ridenour;
- 110) Robert Walsh;
- 111) Vernell Roberson;
- 112) Anna Harrington;
- 113) Alice Wells;
- 114) Matthew DeClue;
- 115) Kevin Muhammad;
- 116) Carrie Hess;
- 117) William Maylor;
- 118) Sonya Stay;
- 119) Anthony Pullen;
- 120) Charlie Miller;
- 121) Donald Baynard;
- 122) Andrew Grace; and

123) Patrick Renze.

5. Client matter and purpose to which the following deposits to your operating account are attributable:

- 1) January 11, 2017 - \$387.50;
- 2) January 18, 2017 - \$800.00 and \$1,325.00;
- 3) January 31, 2017 - \$900.00;
- 4) February 14, 2017 - \$450.00;
- 5) February 16, 2017 - \$1,100.00;
- 6) March 1, 2017 - \$600.00;
- 7) April 10, 2017 - \$1,100.00;
- 8) July 14, 2017 - \$150.00; and
- 9) August 2, 2017 - \$850.00.

6. Client to which the February 1, 2017, refund from your operating account in the amount of \$375.00 is attributable;

7. Copy of June 26, 2016, Invoice #8067753 to Danielle Moore; and

8. Explanation of August 31, 2017, \$1,500.00 "Book Trn Credit" from your operating account.

Please be advised that failure to produce the records may result in the initiation of proceedings pursuant to Enforcement Rule 208(f)(1) or (f)(5) (relating to emergency temporary suspension orders and related relief), the latter of which specifically permits Disciplinary Counsel to commence a proceeding for the temporary suspension of a respondent-attorney who fails to maintain or produce Pa.R.P.C. 1.15 records after receipt of a request or demand authorized by subdivision (g) of Rule 221.

In addition to providing this Office with the above-requested information, please provide responses to the following allegations within thirty (30) days of the date of this letter:

1. You are the only signatory on your PNC IOLTA Account and PNC operating account.

2. By Pennsylvania Supreme Court Order dated July 26, 2017, effective August 25, 2017, you were placed on Administrative Suspension for failure to complete the 2017-2018 Annual Attorney Registration.

3. Following your administrative suspension, you failed to notify all clients, all persons to whom you owe a fiduciary duty, all persons whom you may at any time expect to have professional contacts under circumstances that there is a reasonable probability that they may infer that you continue as an attorney in good standing, and all tribunals, courts, agencies, or jurisdictions in which you are admitted to practice of your administrative suspension.

4. Within 10 days after the effective date of your administrative suspension, you failed to file with the Secretary of the Disciplinary Board, with a copy served to Disciplinary Counsel, a verified statement, as required by Pa.R.D.E. 217(e)(1).

5. Following your administrative suspension, you failed to take reasonable steps to have your designation as "Managing Attorney" removed from the website of Synergy Attorney Services, LLC and failed to update your LinkedIn profile to remove your designation as an active attorney.

6. Regarding your operating account, following the effective date of your administrative suspension, you continued to accept payments from clients and refund monies to clients, as follows:

- 1) August 28, 2017 - \$740.00 deposited for Vernell Roberson;
- 2) August 28, 2017 - \$200.00 refunded to Anna Harrington;
- 3) August 30, 2017 - \$450.00 refunded to Alice Wells;
- 4) August 31, 2017 - \$550.00 deposited for Douglas Monroe;
- 5) September 1, 2017 - \$40.00 deposited for Vernell Roberson;
- 6) September 1, 2017 - \$302.50 deposited for Don Costello;
- 7) September 7, 2017 - \$650.00 refunded to Matthew DeClue;
- 8) September 11, 2017 - \$387.50 deposited for Lenora Polk;
- 9) September 11, 2017 - \$100.00 refunded to Kevin Muhammed;
- 10) September 14, 2017 - \$1,000.00 deposited for Donald Johnson;
- 11) September 19, 2017 - \$450.00 refunded to Carrie Hess;
- 12) September 20, 2017 - \$310.00 paid out on behalf of William Maylor for "BK filing fee";¹
- 13) September 21, 2017 - \$500.00 refunded to David Green;

¹ Mr. Maylor was a *pro se* litigant throughout his bankruptcy action, docketed at *In re William Lawrence Maylor*, Case No. 17-22836 (Baltimore Md. Bankruptcy). At no point have you been licensed to practice or obtained *pro hac vice* before the United States Bankruptcy Court for the District of Maryland at Baltimore.

- 14) September 25, 2017 - \$625.00 deposited for Sonya Stay;
- 15) September 29, 2017 - \$350.00 refunded to Anthony Pullen;
- 16) September 29, 2017 - \$250.00 refunded to Charlie Miller;
- 17) October 2, 2017 - \$1,250.00 deposited for Donald Baynard;
- 18) October 3, 2017 - \$700.00 deposited for Patrick Renze;
- 19) October 4, 2017 - \$550.00 deposited for Douglas Monroe;
- 20) October 4, 2017 - \$50.00 deposited for Charles Zajatz;
- 21) October 5, 2017 - \$1,000.00 refunded to Andrew Grace;
- 22) October 5, 2017 - \$550.00 deposited for Donald Rakus;
- 23) October 12, 2017 - \$387.50 deposited for Lenora Polk; and
- 24) October 13, 2017 - \$1,000.00 deposited for Donald Johnson.

7. Regarding your IOLTA account, following the effective date of your administrative suspension, you continued to utilize the account, as follows:

- 1) August 25, 2017 - \$9,287.50 deposited from Corp ACH Merch Bankcard [REDACTED] 1437;
- 2) August 25, 2017 - \$9,287.50 transferred to your operating account;
- 3) August 28, 2017 - \$15,163.75 deposited from Corp ACH Merch Bankcard [REDACTED] 1437;
- 4) August 28, 2017 - \$5,062.50 deposited from Corp ACH Merch Bankcard [REDACTED] 1437;
- 5) August 28, 2017 - \$2,025.00 deposited from Corp ACH Merch Bankcard [REDACTED] 1437;
- 6) August 28, 2017 - \$810.00 deposited from Corp ACH Merch Bankcard [REDACTED] 1437;
- 7) August 28, 2017 - \$23,061.25 transferred to your operating account;
- 8) August 29, 2017 - \$4,140.00 deposited from Corp ACH Merch Bankcard [REDACTED] 1437;
- 9) August 29, 2017 - \$223.90 paid to ACH Debit Purchase Nma X7199;
- 10) August 29, 2017 - \$3,916.10 transferred to your operating account;
- 11) August 30, 2017 - \$6,225.00 deposited from Corp ACH Merch Bankcard [REDACTED] 1437;

Megan Kerrigan
November 29, 2017
Page 10

- 12) August 30, 2017 - \$1.00 paid to ACH Debit Purchase Nma X7199;
- 13) August 30, 2017 - \$6,224.00 transferred to your operating account;
- 14) August 31, 2017 - \$6,200.00 deposited from Corp ACH Merch Bankcard [REDACTED] 1437; and
- 15) August 31, 2017 - \$6,200.00 transferred to your operating account.

8. Corp ACH Merch Bankcard [REDACTED] 1437 is attributable to Synergy Legal Services, LLC.

9. You have been serving as a Managing Attorney for Synergy Legal Services, LLC, from at least January 1, 2016, to date.

If the above allegations are true, we are concerned that you have violated the following Rules of Professional Conduct: **RPC 1.15(b); RPC 1.15(i); RPC 1.15(j); RPC 1.15(k); RPC 1.15(l); RPC 1.15(m); RPC 5.5(a); RPC 7.1; Pa.R.D.E. 217(a), (b), (c), (d)(2), (e), (j)(2), (j)(4); and Pa.R.D.E. 219(a) & (d).**

It is important for you to understand that it is the obligation of our Office to develop all information relevant to a complaint, including information that may justify or exonerate the alleged actions of the respondent-attorney or mitigate the seriousness of any violations that may have occurred. Since this complaint has survived our initial screening process, you should retain or consult with counsel before submitting a statement of your position.

The Office of Disciplinary Counsel will make no recommendation for the disposition of this complaint until you have been afforded an opportunity to state your position with respect thereto within thirty (30) days of the date of this letter. Please note that failure to respond to this request for your statement of position without good cause is an independent ground for discipline pursuant to Rule 203(b)(7) of the Pennsylvania Rules of Disciplinary Enforcement. The Office of Disciplinary Counsel will only agree to a limited extension of the thirty day deadline when the request is made for specific reasons constituting good cause. If you do not respond or provide good cause for failing to respond within 30 days, the Office of Disciplinary Counsel may seek to impose discipline for your violation of Pa.R.D.E. 203(b)(7).

Please be assured that we are not prejudging the alleged facts and charges nor are we an advocate on behalf of the complainant. Rather we are conducting an impartial and unbiased investigation with regard to this complaint. In that regard, we will attempt to verify the statements in your answer just as we do with the statements made to us by the complainant. For this reason, and because a lawyer can be subject to discipline for making a materially false statement or deliberately failing to disclose a material fact in connection with a disciplinary matter, you should be careful to be accurate in your factual statements. Additionally as previously stated, you may wish to consult with counsel before replying to the allegations.

Megan Kerrigan
November 29, 2017
Page 11

In any reply that you make, please chronologically and specifically state your account of the events and include copies of any particularly pertinent documents to which you refer. Generally, it is most helpful if your response deals item-by-item with the allegations contained in the numbered paragraphs in this letter, as well as with the cited Rules.

Please be advised that §85.13 of the Disciplinary Board Rules requires that any response to this letter:

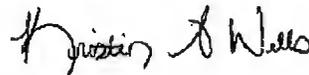
... that contains an averment of fact not appearing of record or a denial of fact shall include or be accompanied by a verified statement signed by the respondent-attorney that the averment or denial is true based upon knowledge or information and belief. The respondent-attorney need not aver the source of the information or expectation of ability to prove the averment or denial. The verified statement may be based upon personal knowledge as to a part and upon information and belief as to the remainder.

If we do not hear from you within thirty (30) days, we will assume that you do not desire to submit your position with respect to this complaint and can proceed to make our recommendation for an appropriate disposition on the basis of the information and material contained in our file, including your failure to respond in violation of Rule 203(b)(7), Pa.R.D.E.. However, we would certainly prefer to have the benefit of your position before making our recommendation.

With few exceptions, the attorney disciplinary system is confidential and remains so unless and until formal disciplinary charges are filed by the Office of Disciplinary Counsel against the respondent-attorney with the Disciplinary Board and the respondent-attorney has had the opportunity to answer those charges.

If you have any further questions, please direct your inquiry to my attention.

Very truly yours,



Kristin A. Wells
Disciplinary Counsel

KAW

VERIFICATION

The statements contained in the foregoing Petition for Emergency Temporary Suspension and Related Relief Pursuant to Pa.R.D.E. 208(f)(1) & (5) are true and correct to the best of my knowledge or information and belief and are made subject to the penalties of 18 Pa.C.S.A. § 4904, relating to unsworn falsification to authorities.

21 December 2017
Date

Kristin A. Wells
Kristin A. Wells
Disciplinary Counsel
Attorney Reg. No. 312080

BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA

Office of Disciplinary Counsel, : No. Disciplinary Docket
Petitioner : Docket No.
 :
v. : Attorney Registration
 : No. 307279
Megan Anne Kerrigan, :
Respondent : (Dauphin County)

**AFFIDAVIT OF ATTEMPTED SERVICE OF PETITION FOR EMERGENCY
TEMPORARY SUSPENSION AND RELATED RELIEF PURSUANT TO
Pa.R.D.E. 208 (f)(1) & (5)**

I, Lowell R. Kratzer, affirm and state that I am employed as an Auditor Investigator with Office of Disciplinary Counsel, Disciplinary Board of the Supreme Court of Pennsylvania, and that on December 29, 2017, I attempted to personally serve upon Megan Anne Kerrigan, Esq., the Respondent, a copy of the Petition for Emergency Temporary Suspension and Related Relief Pursuant to Pa.R.D.E. 208 (f)(1) & (5), in the above captioned matter, which complies with the requirements of Section 89.53 of the Rules of the Disciplinary Board.

Specifically, on December 29, 2017 at 10:07 AM, I traveled to Respondent's Law Office, 260 North Street, Harrisburg, PA 17101. Since the front door was locked and no one answered, I placed a copy of the Petition in the mail slot of the door.

At 10:18 AM, I visited Respondent's home, 1611 N. 2nd St., Harrisburg, PA 17102. The outer door to 1611 was locked and no one answered. I placed a second copy of the Petition through the mail slot in the outer door.

I then traveled to the home of Respondent's Mother, []. When I arrived at 10:33 AM, no one answer the doorbell so I left my business card wedged in the front door with a note on the back of the card asking Respondent to call me ASAP. As of the date of this Affidavit, she has not contacted this Office.

This statement is made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Exhibit A

January 2, 2018

AFFIDAVIT

1/2/2018
DATE

Lowell R. Kratzer
Lowell R. Kratzer
Auditor Investigator
District III

Sworn to and subscribed before me this
2 day of January, 2018.

Kandy L. Coyle

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Kandy L. Coyle, Notary Public
City of Harrisburg, Dauphin County
My Commission Expires May 17, 2021
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

IN THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL,	:	No. Disciplinary Docket
Petitioner	:	Docket No.
	:	
v.	:	Board File No. C3-17-551
	:	
	:	
MEGAN ANNE KERRIGAN,	:	Attorney Reg. No. 307279
Respondent	:	
	:	(Dauphin County)

ORDER AND RULE TO SHOW CAUSE

AND NOW, this ____ day of _____, 201_, after consideration of the within Petition, Respondent, Megan Anne Kerrigan, is ordered to prepare and deliver within ten days of the date of this Order to the Office of Disciplinary Counsel, 601 Commonwealth Avenue, Suite 5800, Harrisburg, Pennsylvania 17106: (1) a list of the names and addresses of all clients and other entities she is currently representing in which she is a fiduciary, showing the dates, amounts and circumstances of the entrustment and current balance thereof, as well as the banks and account numbers in which such funds are currently maintained; and (2) all records requested by Petitioner pursuant to Pa.R.D.E. 221(g)(1) by letter dated November 29, 2017.

FURTHER, this Court issues a Rule upon Respondent to show cause why she should not be placed on temporary suspension pursuant to Pa.R.D.E. 208(f)(1).

Respondent is directed to file any Response to the Petition and to this Rule within ten (10) days of the date hereof and to timely serve a copy of said response upon the Office of Disciplinary Counsel.

IN THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, Petitioner	:	No. Disciplinary Docket Docket No.
	:	
v.	:	Board File No. C3-17-551
	:	
	:	
MEGAN ANNE KERRIGAN, Respondent	:	Attorney Reg. No. 307279 (Dauphin County)

ORDER

AND NOW, this ____ day of _____, 201__, an Order and Rule to Show Cause having been entered by this Court on _____, and upon consideration of the responses filed, it is hereby ORDERED that:

1. The Rule is made absolute and Respondent is placed on temporary suspension until further definitive action by this Court;
2. Respondent shall comply with the provisions of Pa.R.D.E. 217;
3. The President Judge of the Court of Common Pleas of Dauphin County, in accordance with Pa.R.D.E. 217(g), take such further action and make such further orders as may appear necessary to protect the rights and interests of Respondent's clients; and
4. All financial institutions in which Respondent holds accounts shall freeze such accounts pending further order of this Court.

This Order constitutes an imposition of public discipline within the meaning of Pa.R.D.E. 402, pertaining to confidentiality.

IN THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL,	:	No. Disciplinary Docket
Petitioner	:	Docket No.
	:	
v.	:	Board File No. C3-17-551
	:	
	:	
MEGAN ANNE KERRIGAN,	:	Attorney Reg. No. 307279
Respondent	:	
	:	(Dauphin County)

CONCURRENCE OF DISCIPLINARY BOARD MEMBER

TO THE CHIEF JUSTICE AND JUSTICES OF THE SUPREME COURT OF PENNSYLVANIA:

Pursuant to Pa.R.D.E. 208(f) and of the Disciplinary Board Rules § 91.151(a), I have reviewed the foregoing Petition for Emergency Temporary Relief, and concur in the presentation of the Petition to the Supreme Court of Pennsylvania by the Office of the Disciplinary Counsel.

12/20/17
Date


Brian J. Cali, Member
The Disciplinary Board of the
the Supreme Court of Pennsylvania

IN THE SUPREME COURT OF PENNSYLVANIA

In the Matter of : No. 205 Disciplinary Docket No. 3
: :
MEGAN ANNE KERRIGAN, : Board File No. C3-17-551
Respondent : Attorney Registration No. 307279
: :
: (Dauphin County)

PROOF OF SERVICE

I hereby certify that, on December 22, 2017, the foregoing documents were sent to Respondent by email, at the addresses listed below:

MeganK@kerriganlegal.com
megankerriganlaw@gmail.com

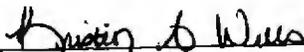
On December 29, 2017, personal service of the foregoing documents was attempted, as required by Pa.R.D.E. 208(f)(1), as indicated in the Affidavit attached hereto as "Exhibit A." I further certify that I am this day serving the foregoing documents upon Respondent in the manner indicated below, which service satisfies the requirements of Pa.R.D.E. 212:

Service by First Class Mail addressed as follows:

Megan Anne Kerrigan
Kerrigan Law Office
260 North Street, 1st. Floor
Harrisburg, PA 17101

Megan Anne Kerrigan
1611 N. 2nd Street
Harrisburg, PA 17102

Dated: 2 January 2018



Kristin A. Wells
Disciplinary Counsel
District III

IN THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL : No. 2439 Disciplinary Docket No. 3
:
Petitioner : Board File No. C3-17-551
:
v. : Attorney Reg. No. 307279
:
MEGAN ANNE KERRIGAN, : (Dauphin County)
:
Respondent : **205 DB 2017**

ORDER AND RULE TO SHOW CAUSE

PER CURIAM

AND NOW, this 11th day of January, 2018, upon consideration of the Petition for Emergency Temporary Suspension and Related Relief, a Rule is issued upon Megan Anne Kerrigan to show cause why she should not be placed on temporary suspension. See Pa.R.D.E. 208(f)(1). Respondent is directed to file any response within ten days of the date hereof and to timely serve a copy of said response upon the Office of Disciplinary Counsel at the Pennsylvania Judicial Center, 601 Commonwealth Avenue, Suite 5800, Harrisburg, Pennsylvania 17106.

Within that same timeframe, and at the address listed above, Respondent is further directed to provide the Office of Disciplinary Counsel with (1) a list of the names and addresses of all clients and other entities she is currently representing or with respect to which she is a fiduciary, showing the dates, amount and circumstances of the entrustment and the current balance thereof, as well as the banks and account numbers in which such funds are currently maintained; and (2) all records requested by Petitioner pursuant to Pa.R.D.E. 221(g)(1) by letter dated November 29, 2017.

A True Copy Patricia Nicola
As Of 1/11/2018

IN THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL	:	No. 2439 Disciplinary Docket No. 3
	:	
Petitioner	:	Board File No. C3-17-551
	:	
v.	:	Attorney Reg. No. 307279
	:	
MEGAN ANNE KERRIGAN,	:	(Dauphin County)
	:	
Respondent	:	

ORDER

PER CURIAM

AND NOW, this 31st day of January, 2018, in the absence of a response to this Court's Rule to Show Cause why Respondent should not be placed on temporary suspension, the Rule is made absolute. It is provided that:

1. Respondent is placed on temporary suspension until further definitive action by this Court;
2. Respondent shall comply with the provisions of Pa.R.D.E. 217;
3. The President Judge of the Court of Common Pleas of Dauphin County shall enter such orders as may be necessary to protect the rights of Respondent's clients or fiduciary entities with which she is involved, see Pa.R.D.E. 217(g); and
4. All financial institutions in which Respondent holds fiduciary funds shall freeze such accounts pending further action.

Respondent's rights to petition for dissolution or amendment of this order and to request accelerated disposition of charges underlying this order pursuant to Pa.R.D.E. 208(f)(6), are specifically preserved.

This Order constitutes an imposition of public discipline pertaining to confidentiality. See Pa.R.D.E. 402.

A True Copy Patricia Nicola
As Of 1/31/2018

Attest: 
Chief Clerk
Supreme Court of Pennsylvania