



The
DISCIPLINARY BOARD
of the Supreme Court of Pennsylvania

March 2026
Newsletter



The Keystone Lex

From the Chair

As my tenure as Chair of the Disciplinary Board draws to a close, I want to be sincere about what this year has meant.

The work of this organization is not symbolic. It is the mechanism by which the Commonwealth's legal profession maintains its ethical foundation and, by extension, the public's trust in the rule of law. The Board's [2025 Annual Report](#) details the scope of that work, carried out by Board Members, Hearing Committee Members, and a staff whose dedication to this mission is evident on every page.



I am pleased to welcome Joan Marie Wright, of Philadelphia, and Nancy Conrad, Esq., of Lehigh County, who were appointed by the Supreme Court to serve as members of the Disciplinary Board effective April 1, 2026. Their contributions to the Board's work will be both valued and consequential.

To my fellow Board Members, to every volunteer Hearing Committee Member, to the staff who carry this institution forward daily, and to our partner Court agencies: thank you. Your commitment to public service and to the highest ethical standards is not an abstraction. It is reflected in the quality and integrity of every matter this organization touches.

I congratulate Shohin H. Vance, the incoming Board Chair, and Laura E. Ellsworth, the incoming Vice-Chair, and offer them my full confidence as they assume leadership. The Board is well-positioned for another productive year under their stewardship.

To Chief Justice Debra Todd and the Justices of the Supreme Court of Pennsylvania, I offer my sincere gratitude for the privilege of serving as Chair. I have served the disciplinary system for eighteen years, first as a Hearing Committee Member, then as a Board Member, and finally as its Chair. It has been the defining professional honor of my career.

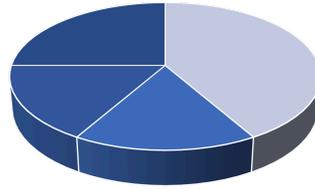
To every member of the Bar of this Commonwealth: I wish you a rewarding and productive 2026.

With gratitude,

David S. Senoff
Board Chair

Discipline Imposed

February 2026



- Informal Admonition - 5
- Private Reprimand - 0
- Public Reprimand - 0
- Public Censure - 0
- Disability Inactive - 2
- Temporary Suspension - 0
- Probation - 0
- Suspension - 2
- Disbarment - 3

Disability Inactive

[Stanton D. Levenson](#)

[Cheryl J. Sturm](#)

Suspension

[Jon Mitchell DeMasi](#)

[David Ryan Nussey](#)

Disbarment

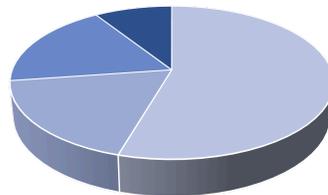
[John M. Kerr](#)

[John McDanel](#)

[Renee Lynn Piper](#)

Reinstatements

February 2026



- From Inactive - 6
- From Retired - 2
- From Administrative Suspension - 2
- From Disability Inactive - 0
- From Suspension - 0
- From Disbarment - 1
- Reinstatement Denied - 0

From Inactive

[N'Jameh Samuels Ford](#)

[Elisa Nicole Eberhardt](#)

[John Everett Moriarty](#)

[Tina Niehold Moss](#)

[Laurel Brooke Peltzman](#)

[Heather Marie Rose](#)

From Retired

[James Joseph McEntee](#)

[Patrick Spaulding Ryan](#)

From Administrative Suspension

[Joseph Saul Sternberg](#)

[Colleen Lynn Becker](#)

From Disbarment

[John Harper Estey](#)

Note: The above-listed granted reinstatement matters reflect only those granted by Supreme Court Order. An attorney listed as reinstatement granted, but whose current license status does not reflect reinstatement, has yet to submit the fees necessary to finalize reinstatement.

Disciplinary Board News

Joan Marie Wright of Philadelphia and Nancy Conrad of Lehigh County Appointed Members of Pennsylvania Disciplinary Board

The Disciplinary Board of the Supreme Court of Pennsylvania has announced the appointments of Joan Marie Wright, a Senior Paralegal at Faegre Drinker Biddle & Reath LLP, and Nancy Conrad, a partner and the chair of the Higher Education Group at White and Williams, LLP, as Members of the Board.

The appointments are effective April 1, 2026 for a term of six years.

Joan Marie Wright

A Senior Paralegal at Faegre Drinker Biddle & Reath LLP, Joan Marie Wright is a member of the Business Litigation Practice Group and supports a nationally recognized trial team in defending pharmaceutical and financial service clients facing governmental investigations and inquiries, enforcement proceedings, and complex litigation involving the False Claims Act and the Anti-Kickback Statute.

Throughout Ms. Wright's nearly twenty-five years as a paralegal, she has developed a deep respect for the ethical responsibilities that accompany the privilege of practicing law and gained valuable insight into the challenges legal professionals face and the importance of a fair, balanced, and transparent disciplinary process.

Ms. Wright earned a Bachelor of Science in Paralegal Studies from Peirce College and served as a member of the College's Inaugural Leadership Development Program. Ms. Wright is a NFPA PACE Registered Paralegal and a Pennsylvania Certified Paralegal.

Outside of the legal profession, Ms. Wright serves as a Member of the Board of the Harrowgate Civic Association and as a Community Granting Advisor to the Kensington Community Resilience Fund. She is involved in many other community service-related projects.

Nancy Conrad, Esq.

Nancy Conrad is a partner and the chair of the Higher Education Group at White and Williams, LLP. She works with employers to address and resolve workplace issues. For more than twenty years, she has represented businesses, educational institutions, and non-profit organizations in all aspects of workplace disputes.

In addition to litigating employment-related disputes, Ms. Conrad counsels employers in all aspects of workplace issues. She has particular experience in representing colleges, universities, and schools in matters related to faculty, staff, and students.

Ms. Conrad has led investigation teams for employers, including educational institutions. She conducts internal investigations on issues related to compliance, personnel, and sexual misconduct. She is a certified Level 2 ATIXA Civil Rights Investigator.

Ms. Conrad is a frequent speaker on workplace issues, including ADA, FMLA, and EEO compliance. She supports organizations and philanthropic programs that provide training and mentoring to students, faculty, and staff, including Title IX compliance.

From 2017-2023 and again in 2025-2026, Ms. Conrad served as a Disciplinary Board volunteer Hearing Committee Member for District II. She is a past president of the Bar Association of Lehigh County and is a member of the National Association of College and University Attorneys. In 2025, she was recognized among the 2026 *Best Lawyers*®. Ms. Conrad also was honored with the Greater Lehigh Valley Chamber of Commerce Athena Award which honors women striving for the highest levels of professional accomplishment while devoting time and energy to their community.

Ms. Conrad served as the president of the Pennsylvania Bar Association (PBA) from 2024-2025. In 2019, the PBA Commission on Women in the Profession honored Ms. Conrad with its Anne X. Alpern Award, which "recognizes a female lawyer or judge who demonstrates excellence in the legal profession and who makes a significant professional impact on women in the law."

After earning her bachelor's degree from Lycoming College, Ms. Conrad earned her master's degree from the Pennsylvania State University and her Juris Doctor from Temple University School of Law.



Disciplinary Board Issues 2025 Annual Report

The Disciplinary Board has issued its [Annual Report for 2025](#). Below are a few highlights.

The Board held four meetings in 2025. At its meetings, the Board adjudicated seventeen matters. The matters consisted of eleven discipline cases and six reinstatements. In 2025, the Supreme Court issued orders in twelve adjudicated matters, adopting the Board's recommendation in ten of those.

In 2025, there were 149 serving Hearing Committee members – forty-nine in District I (Philadelphia), thirty-one in District II (suburban Philadelphia), twenty-three in District III (central and northeastern PA), and forty-six in District IV (western PA). Hearing Committee members review recommended disposition of complaints as offered by the Office of Disciplinary Counsel, conduct disciplinary and reinstatement hearings, either as a three-member panel or single designated member, and prepare written reports and recommendations to the Board following disciplinary and reinstatement proceedings.

Thirty-six Petitions for Discipline and thirty Joint Petitions in Support of Discipline on Consent were filed in 2025, along with one petition for emergency temporary suspension and two contempt petitions. Nine Petitions for Reinstatement were filed, of which five were granted and one denied. Eighty-four other documents seeking return to active status were filed. In 2025, 506 attorneys were reinstated from inactive, retired, or administrative suspension status.

The following types of discipline were imposed:

- Informal Admonition - 40
- Private Reprimand - 0
- Public Reprimand - 14
- Probation Modification - 1
- Disability Inactive Pa.R.D.E. 301 - 5
- Public Censure - 0
- Temporary Suspension - 12
- Suspension - 19
- Disbarment - 14

In all, 72,439 attorneys completed their registration before the deadline for administrative suspension. This represented 99.58% of eligible attorneys. For failing to complete their registration and pay the annual fee, 317 attorneys were administratively suspended. In 2025, 2,137 attorneys were newly admitted. Sixty retired attorneys continue to serve in emeritus status, providing pro bono service with legal aid organizations, up from forty-eight in 2024.

In 2025, 47,249 attorneys were on Active status and located in Pennsylvania with 17,532 Active out of state, 1,817 Inactive in Pennsylvania, and 7,916 Inactive out of state. There were another 509 in other limited practice roles (Emeritus, In-House Corporate Legal Counsel, Defender or Legal Services Attorney, or Foreign Legal Consultant). Last year, 1,606 were retired, and 463 were on administrative suspension for failure to pay registration fees or complete CLE

requirements.

Using Webex video conferencing for all parties to meet, along with the YouTube platform for livestreaming, the Board conducted and streamed to the public thirty-five hearings, seven oral arguments, and fourteen public reprimands. In total, eighty days of proceedings were live-streamed in 2025, accounting for 279 hours of live-streaming. More than 30,300 streams were initiated, accounting for 17,791 cumulative viewing hours of proceedings.

In 2025, roughly 3.5 million users visited the Board's website where sixty-eight news articles on case decisions and eleven news articles on conservatorships were posted.

The annual assessment for Active attorneys for the 2025-2026 registration year is \$275 which is allocated as follows: \$195 to the Disciplinary Board, \$50 to the Pennsylvania Lawyers Fund for Client Security, and \$30 to the IOLTA Board.

As of December 31, 2025, 639 matters involving taxed expenses and/or administrative fees remained outstanding with a balance of \$2,033,641.85 owed to the Disciplinary Board.

The Office of Disciplinary Counsel (ODC) reported 5,002 opened and 5,002 cases resolved. This was the first year in history that either figure reached the five thousand mark. Disciplinary Counsel participated in thirty-five disciplinary and reinstatement hearings (amounting to fifty-nine days) and seven oral arguments before the Disciplinary Board. This was the highest number of hearing days in the last ten years. One disciplinary hearing involving twelve separate complaints against a single respondent lasted for eleven days – the longest matter in recent memory.

Disciplinary Counsel also assisted in facilitating the refund of fees to a client in six cases; return of a file, documentation, or other property from an attorney to the client in seven; reestablishing communication between a client and the attorney in forty-six; forward movement in twelve stagnant matters; appropriate updates to required forms, contact information, or documents used in the practice of law in seventeen; and educating an attorney short of a letter of education or concern twenty-one times.

ODC opened twelve conservatorship matters and was itself appointed conservator in two of those matters. Five conservatorships concluded; fifteen remain open.

Disciplinary Board Quarterly Publishes Financial Institutions List, Highlighting Platinum Leader Banks

Quarterly, the Disciplinary Board publishes an up-to-date list of financial institutions approved by the Supreme Court for the maintenance of fiduciary accounts of attorneys under the terms of [Pennsylvania Rule of Disciplinary Enforcement 221](#). The most recent list [was printed](#) in the February 21, 2026 issue of the *Pennsylvania Bulletin*.

No new institutions have been added to the list this quarter.

Readers will notice that some of the institutions on the list are designated as [Platinum Leader Banks](#). These institutions have made a commitment to support the [Interest on Lawyer Trust Accounts \(IOLTA\)](#) program and increase funding for legal representation of those in need of free civil legal services. The PA IOLTA Board provides critical grant funding to legal aid organizations that deliver free civil legal aid to low-income Pennsylvanians facing a legal crisis where a basic human need is at stake.

Read more about Platinum Leader Banks and view the full list of institutions currently designated as such [here](#).

Rules

Disciplinary Board Amends Rules Regarding Complaints Against Members, Conservatorship

In an Order published at [56 Pa.Bulletin 788](#) (2/7/2026), the Disciplinary Board has adopted amendments to its rules regarding conservatorship proceedings.

The Order amends the Board Rules and Procedures to conform to Pennsylvania Rules of Disciplinary Enforcement 321, 322, 324, 325, 327, and 328 (relating to conservators for the interests of clients).

[Section 91.121](#) [appointment of conservator to protect interests of clients of absent attorney] is amended to add new language to allow the court appointing a guardian to adopt, as its findings of fact and statement of grounds, some or all of the allegations of the application for appointment of a conservator and attach the application to the appointing order.

[Section 91.122](#) [duties of conservator] is the subject of several amendments.

Section 91.122(a)(4) contains new language requiring a conservator to publish notice of the appointment which shall, at minimum, appear on one day in both a newspaper of general circulation and the legal journal in the county in which the absent attorney maintained a principal office.

Subsection (a)(5) is amended to delete a requirement that the conservator deliver all receipts to the appointing court at the time of filing the application for discharge and provides instead that the conservator must maintain an electronic record of all receipts.

[Subsection \(b\)](#) forbids either the conservator or any partner, associate, or other lawyer practicing in association with the conservator to represent any of the absent attorney's clients in connection with any matter identified during the conservatorship. With the consent of the client, the conservator may refer a client's matter to a lawyer other than a lawyer disqualified from providing representation. The conservator may not receive a referral fee. Language forbidding the conservator from representing any of the absent lawyer's clients for three years is eliminated.

Amendments to [Section 91.125](#) [duration of conservatorship] expand the interval for which the appointing court may extend the conservatorship from six to nine months, and allow the court to grant one or more extensions of the appointment, each extension not to exceed six months. A requirement for showing extraordinary circumstances to justify extensions is eliminated.

[Section 91.127](#) [liability of conservator] is amended to provide that the conservator shall be immune from civil suit brought by or on behalf of the absent attorney. It previously stated that the conservator was immune from "separate" suit.

The amendments are effective thirty days after publication in the *Pennsylvania Bulletin*, or on March 9, 2026.

Upcoming Public Proceedings

We encourage you to observe our public disciplinary and reinstatement hearings, oral arguments, and public reprimands on the [Board's YouTube channel](#). You can also view "Upcoming Public Proceedings" at the bottom of the Board's [home page](#).

Scheduled proceedings begin at 9:30 am unless otherwise noted.

March		
March 18	Joseph Alexander Scioscia, III	Disciplinary Hearing
March 25-26	Feng Li	Reinstatement Hearing
March 30-31	Erin Alma Pohland	Reinstatement Hearing
April		
April 13	Marco di Prato	Disciplinary Hearing
April 27-28	Lawrence L. Rubin	Disciplinary Hearing
May		
May 4-5	David Paul Clark	Disciplinary Hearing
May 7	David Charles Agresti	Reinstatement Hearing
May 11-13	Aaron Bell	Disciplinary Hearing
May 21	Justin R. Przedziecki	Disciplinary Hearing
June		
June 2-4	Joshua Paul Ward	Disciplinary Hearing
June 8-9	Timothy Reitz	Disciplinary Hearing
June 15-17	Travis Andrew Gordon	Disciplinary Hearing
June 24-25	Marco di Prato (<i>cont.</i>)	Disciplinary Hearing
June 29-30	Elissa Griffith Waldron	Reinstatement Hearing
July		
July 20-21	Dustin William Cole (<i>cont.</i>)	Disciplinary Hearing
July 29-31	Phyllis Joan Rebecca Powers	Disciplinary Hearing
August		
August 4-5	Shahily Negron	Disciplinary Hearing
August 12-13	J. Michael Considine, Jr.	Disciplinary Hearing
August 17	Fred William Freitag, IV	Disciplinary Hearing
August 31 (<i>cont.</i>)	J. Michael Considine, Jr.	Disciplinary Hearing
To Be Scheduled		
Scott Eric Diamond – Oral Argument		
Thomas P. Sundmaker – Public Reprimand		
Robert M. Tobia – Public Reprimand		
Bruce K. Warren, Jr. – Disciplinary Hearing		

Articles of Interest

Philadelphia Lawyer Agrees to Reprimand for Nationwide Debt Relief Practice

The Pennsylvania Disciplinary Board has ordered that Philadelphia lawyer [Robert M. Tobia](#) be subject to a Public Reprimand, based on a Joint Petition in Support of Discipline on Consent between Disciplinary Counsel and Tobia.

The Joint Petition recites that Tobia managed a nationwide debt relief practice, operating through six companies. The Petition stated, “Although the entities operated under Respondent’s ownership, many operational functions — including initial client communications, intake, and referral to local counsel — were delegated to nonlawyer administrative teams supervised by the third-party administrator. This structure was intended to facilitate nationwide service delivery, but in practice created problematic gaps in oversight.” The Joint Petition further provided that Tobia failed to ensure that the entities’ websites contained required disclosures, failed to obtain the clients’ informed consent for the sharing of fees with lawyers outside the firm, and delegated

supervisory authority over staff to a third-party administrator. He relied on nonlawyer staff to create the attorney-client relationship for the consumer debtor clients without providing specific information about the referral attorneys in firm disclaimers and related fee agreements and failed to obtain informed consent from the clients to share fees with lawyers outside of the relevant firm. The parties stipulated that this conduct violated [RPC 1.5\(e\)](#) [division of fees with another lawyer]; [5.1\(a\)](#) [failure to have in place measures to avoid violation of the RPC]; [5.3\(c\)\(1\)](#) [responsibility for nonlawyer employees]; and [7.2\(h\)](#) [content of advertisements].

The Joint Petition also set forth particulars of five cases and seven pending complaints involving similar misconduct, as well as failure to refund unearned fees paid in advance, in violation of [RPC 1.16\(d\)](#). Tobia subsequently refunded the disputed fees.

The Joint Petition noted an aggravating factor of a prior Public Reprimand in 2022 and mitigating factors that Tobia had taken corrective action and was winding down the debt relief activities at issue. It reviewed applicable case law and found that Public Reprimand had previously been imposed in several cases involving improper division of fees and failure to supervise nonlawyer staff. Accordingly, the parties agreed that Public Reprimand was the appropriate discipline. The Disciplinary Board accepted this proposed disposition and imposed a Public Reprimand by Order dated January 7, 2026.

New Jersey Supreme Court Limits Liability of Lawyer to Nonclient

The Supreme Court of New Jersey [has decided](#) a case which deals with the liability of a lawyer to a nonclient for malpractice, adopting [Section 51 of the Restatement \(Third\) of the Law Governing Lawyers](#), which provides that a lawyer has a duty of care to a nonclient only when the lawyer or (with the lawyer's acquiescence) the lawyer's client invites the nonclient to rely on the lawyer's services and the nonclient so relies.

The case of [Christakos v. Boyadjis](#) arose out of an estate situation. The lawyer had prepared wills for two brothers who both died shortly thereafter. The plaintiff was their niece, the daughter of a third brother who predeceased the testators. She and some relatives had an interest in previous wills executed by the brothers but were excluded from the rather complicated succession structure of the new wills. The lawyer admitted to multiple mistakes in the interpretation and execution of the wills, but the findings of fact indicated that the brothers clearly intended to disinherit the nieces and nephews.

The Court held that to sustain a claim for legal malpractice, a plaintiff must prove: (1) the existence of an attorney-client relationship creating a duty of care by the defendant attorney, (2) the breach of that duty by the defendant, and (3) proximate causation of the damages claimed by the plaintiff. The Court noted that claims by people who were not the lawyer's client typically fail at the first element of the test, as the lawyer generally does not have a duty of care to nonclients. The Court commented, "Because allowing non-clients to sue attorneys for legal malpractice can chill zealous advocacy, instances in which an attorney has been held liable to non-clients have been carefully circumscribed, but the Court had not formally adopted a controlling standard."

The Court decided to formally adopt [Section 51 of the Restatement \(Third\) of the Law Governing Lawyers](#) as its governing standard. Section 51(2) states that a lawyer owes a duty of care to a non-client when "(a) the lawyer or (with the lawyer's acquiescence) the lawyer's client invites the nonclient to rely on the lawyer's opinion or provision of other legal services, and the nonclient so relies; and (b) the nonclient is not, under applicable tort law, too remote from the lawyer to be entitled to protection." Subsection (3) adds that a lawyer owes a duty of care to a non-client when: "(a) the lawyer knows that a client intends as one of the primary objectives of the representation that the lawyer's services benefit the nonclient; (b) such duty would not significantly impair the lawyer's performance of obligations to the client; and (c) the absence of such a duty would make enforcement of those obligations to the client unlikely." The Court found that the plaintiff niece did not rely on the lawyer's opinions and that neither of the brothers who were the lawyer's clients invited her reliance or indicated to the lawyer that it was their intention that she benefit from the estate.

The Court also rejected the plaintiff's argument that the lawyer should not have prepared a will for one of the brothers because he lacked testamentary capacity. It noted that the Restatement explicitly rejects this theory as grounds for a duty in a legal malpractice case. The Court added, "Recognizing a duty to a purported heir could conflict with an attorney's vigorous representation of their actual client."

The New Jersey State Bar Association appeared in the case as *amicus curiae* on behalf of the lawyer and [reported](#) on the decision.

US Department of Justice Proposes Screening Process for Disciplinary Complaints Against US Attorneys

The United States Department of Justice (DOJ) has issued a proposed rulemaking, published at [91 Fed.Reg.10780](#) (3/5/2026) which would establish a process for the DOJ to conduct a preliminary review of any disciplinary complaint filed with a state disciplinary agency alleging ethical misconduct by a United States Attorney in the course of their Federal duties.

Under the proposed rule, before a current or former DOJ lawyer may participate in any investigative steps initiated by the bar disciplinary authority of a State, Territory, or the District of Columbia in response to allegations that a current or former DOJ attorney violated an ethics rule while engaging in that attorney's federal duties, the DOJ will have the right to review the allegations and shall request that the bar disciplinary authority suspend any parallel investigations until the completion of the DOJ's review. This right of first review will apply whether the allegations are made in a complaint filed by a third party or the bar disciplinary authorities open an investigation into the allegations without a complaint having been filed. Once the DOJ has concluded its investigation and rendered a decision, they will notify the appropriate State bar disciplinary authorities of the completion and, as appropriate, the results of the investigation. The State bar disciplinary authorities are not required to defer to OPR's findings that a DOJ attorney violated an ethics rule. The rulemaking is silent on whether state authorities are bound by a decision by the DOJ that the US Attorney did not violate ethics rules.

The proposed rule further states that, should the relevant bar disciplinary authorities refuse the Attorney General's request, the DOJ shall take appropriate action to enforce this regulation or to prevent the bar disciplinary authorities from interfering with the Attorney General's review of the allegations.

Comments are due on or before April 6, 2026. Comments received by mail will be considered timely if they are postmarked on or before the last day of the comment period. The electronic Federal Docket Management System will accept electronic comments until midnight Eastern time at the end of that day. Comments, identified by the agency name, must be sent via the Federal eRulemaking Portal at www.regulations.gov.

Attorney Well-Being

Betting on Ourselves: When Online Sports Betting Leads to Ethical Misconduct

At Lawyers Concerned for Lawyers of Pennsylvania (LCL-PA), when compared with the percentage of lawyers struggling primarily with mental health and alcohol problems who call our Helpline (1-888-999-1941), we may not receive as many calls from someone who says, "I'm a gambling addict" or "I'm calling about a lawyer I know who I think may be a compulsive gambler." I know that, when I finally visited a lawyer friend of mine in 2008 and told him I needed help, I never mentioned anything about the compulsive gambling that had first led me to resort to the conversion of client funds and a host of other ethical violations. Instead, I chose the obvious. My colleague called LCL and said he was "calling for a friend that had just been arrested for his third DUI." Teeth falling out, congestive heart failure, alcoholic neuropathy and, after we add in the empty packets of cocaine that police found in my car for good measure, there we have it.

Or do we?? Hopefully, this article will help you look below the surface – beyond the obvious and into the world of the lawyer who is impaired by gambling – the silent or "secret" addiction. And how the hyperconnected world which we rely upon to function daily has lent itself to an even greater threat to not only our profession but to public health itself. Add to that the stress and anxiety that is already a part of the everyday life of a lawyer and we have a perfect storm for a new form of impairment – gambling via the internet and, more specifically, sports betting.

We live in a world where the proliferation of online apps and advertisements now provide a never-ending stream of opportunities to gamble that has opened a "virtual" Pandora's box of unintended consequences.

Neither I nor Lawyers Concerned for Lawyers are opposed to sports gambling any more than we are opposed to the use of alcohol. However, online sports gambling has rapidly become a normalized and socially acceptable activity. The convergence of gambling advertising, sports gambling partnerships, celebrity endorsements, media relationships, and the recently emerging role of artificial intelligence has dramatically altered how the gambling industry delivers, and the public consumes, increasingly complex gambling products. And those products are addictive.

For decades, compulsive gambling was the proverbial prodigal son of the mental health family. We stood ready to help the compulsive gambler, but what was being done to prevent the harm from happening? After all, it's simply an impulse control disorder we were told. The onus was clearly being placed on the individual to "fix" themselves. But all of that changed in 2013 when the 5th edition of the Diagnostic and Statistical Manual of Mental Health Disorders (DSM-5) recognized Gambling Disorder as the very first non-substance-related addiction disorder.

Gambling disorder is an addiction just like heroin, opioids, tobacco, alcohol, and cocaine. It also presents with other mental health struggles which typically include anxiety and depression. Lawyers can be particularly vulnerable because of the often-competitive nature of the practice of law. The risk to lawyers is greatly enhanced because many have access to client funds and/or firm trust accounts. Sadly, untreated gambling disorders may result in lawyers feeding an addiction with behaviors completely inconsistent with ethical duties and responsibilities.

In May 2018, when the U.S. Supreme Court decided *Murphy v NCAA*, 138 S. Ct. 1461 (2018), no one could have foreseen what online sports gambling would quickly become. This cleared the way for states to legalize online sports gambling. In fewer than eight years, thirty-nine states and the District of Columbia have done so. And Pennsylvania quickly found itself among the leaders. In 2025, Pennsylvania led the country (other than Nevada) in gambling losses by the public. According to the American Gaming Association, in 2025, people in Pennsylvania lost more than \$7.7 billion dollars.

Roughly ten percent of young men under thirty are considered problem gamblers. The ABA-Hazelden Betty Ford study (*Krill PR, Johnson R, Albert L. The Prevalence of Substance Use and Other Mental Health Concerns Among American Attorneys. J Addict Med. 2016 Jan-Feb;10(1) 46–52.*) found that thirty-two percent of lawyers under the age of thirty were problem drinkers. So, let's concentrate on alcohol, you might be saying. What about the *impact* caused by compulsive or addictive gambling? Every problem gambler is estimated to negatively affect the lives of at least ten other people. And for the lawyer who is impaired by a gambling disorder, that clearly opens the door to violations of the Rules of Professional Conduct.

Lawyers Concerned for Lawyers of PA is a leader in helping lawyers, judges, their family members, and law students who may be struggling with compulsive online sports gambling. We are the only lawyer assistance program in the United States that has a national leader in this field in its peer volunteer base. Harry Levant holds a master's degree in professional clinical counseling from La Salle University, a doctorate in Law and Public Policy from Northeastern University, and a juris doctorate from Temple University School of Law. He is a valued LCL colleague, peer volunteer, and friend. He is also a disbarred Pennsylvania lawyer who stole money from clients, friends, and family members to fuel a gambling addiction. He made his last bet on April 27, 2014, and on that same night nearly took his own life in a suicide attempt.

Dr. Harry Levant is now Director of Gambling Policy with the Public Health Advocacy Institute (PHAI) at Northeastern University School of Law. He is an Internationally Certified Gambling Counselor (ICGC-I) and mental health therapist in private practice with a focus on treating people and families struggling with gambling disorder. In the past two years, Harry has emerged as the nation's leading public health advocate and media expert on sports betting. He has testified as an expert before the US Senate Judiciary Committee and helped author federal legislation known as the SAFE Bet Act aimed at the regulation of online sports betting which was introduced in both the US Senate and House of Representatives. He is also most proud of his role as an LCL Peer Volunteer.

In writing this article, I asked Harry to describe some of the most pressing issues that could lead to a lawyer violating the Rules of Professional Conduct and, indeed, committing a financial crime. "Online gambling now occurs at light speed and ensures that access to sports gambling action never stops. This new and AI-fueled business model will inexorably result in increased gambling addiction and gambling-related harm."

"The 'chasing' of action and/or losses is part of the diagnostic criteria for gambling addiction. Chasing action is also the symptom most closely related to suffering harm. Chasing action is

something I see every day when meeting with clients and families suffering the most dire and devastating effects of gambling and gambling addiction. The effects I see in my clinical work include financial ruin, desperation, suicidal ideation, depression, anxiety, career loss, divorce/separation, criminal behavior, homelessness, cooccurring alcohol and drug disorders, and deep despair.”

Keeping in mind the high prevalence rates of alcohol and substance use disorder and mental health issues revealed in the ABA-Hazelden Betty Ford study, the impact on the legal profession of compulsive online sports betting cannot be overlooked. Dr. Levant said, “Younger adults are fixated on the fast-paced action of in-game micro sports betting. And younger lawyers, who are already experiencing higher prevalence rates of issues with alcohol and distressed mental health, are at even greater risk.”

Gambling takes place on every micro-event within sporting events, from the speed of the next baseball pitch to every football snap, basketball shot, tennis serve, and even ping pong points from Russia and Eastern Europe. Live sports for gambling happen around the globe and around the clock so that the action never stops. If it sounds as if sports has become the equivalent of a non-stop slot machine, it’s because it has. My kids used to ask me questions like, “Hey Dad, what’s a double play?” Now the only question about a “double play” my *grandkids* may ask is, “Hey Pop, what’s a Parlay?”

Lawyers are notoriously reluctant to ask for help with any of their problems. They see themselves as “problem solvers” who would never dare reveal that they might need help with their own problems. The fear associated with a possible disciplinary action as the result of an admitted violation of the Rules of Professional Conduct heightens that fear and can delay what we at LCL call “The Big Ask.”

Rule 8.3(c) of the Pennsylvania Rules of Professional Conduct does not require disclosure of information otherwise protected by Rule 1.6 or information gained by a lawyer or judge while participating in an approved lawyers assistance program. LCL-PA is the only approved lawyers assistance program in Pennsylvania. YOU ARE SAFE when you call us. The Supreme Court wants to encourage lawyers to seek assistance through LCL-PA. As LCL Peer Volunteer Harry Levant explains, “Gambling disorder is a progressive disease which, left untreated, can become pathological. In my present work as a therapist and policy advocate, I advance the message that prevention of harm is the best form of treatment. With early intervention, gambling disorder can be treated, and recovery is within reach. We do not want to see lawyers suffer in silence and this speaks to the importance of the work that Lawyers Concerned for Lawyers of PA does for members of the legal profession and their families.”

LCL-PA saves lives. If gambling or the desire to seek action with gambling is impacting your personal or professional life, please reach out to LCL for help and support. Treatment is available, and recovery is within reach.

March is Problem Gambling Awareness Month.

CALL LCL-PA’s 24-hour helpline and speak to a PERSON 365 days per year at [1-888-999-1941](tel:1-888-999-1941).

Brian S. Quinn, Esq.,
Education and Outreach Coordinator, Lawyers Concerned for Lawyers of Pennsylvania

Lawyers Concerned for Lawyers Seeking Law Students and Recent Graduates to Volunteers

[Lawyers Concerned for Lawyers](#) is looking to diversify its volunteer team, bringing in younger volunteers to provide confidential peer support to lawyers and law students across the Commonwealth.

This opportunity is open to 2L and 3L law students in Pennsylvania as well as recent graduates. Email Carley Eisel at carley@lclpa.org or call 1-800-335-2572 for more information. Each volunteer’s experience can help someone navigating mental health, substance use, grief, burnout, or other life challenges!

LAWYERS CONCERNED FOR LAWYERS
PENNSYLVANIA

ARE YOU A LAWYER, LAW
STUDENT OR JUDGE?
WOULD YOU LIKE TO BE OF
SERVICE TO YOUR PEERS?

- √ *Have you overcome a mental health or substance use challenge, or have you been affected by someone else's substance use or mental health issues?*
- √ *Have you been working a program of sustained recovery for at least one year? (e.g. support groups, counseling, treatment)*

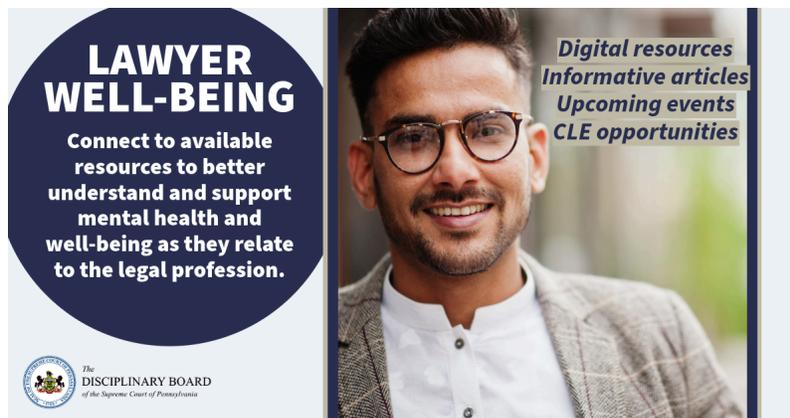
Call LCL today to join our statewide
peer volunteer network.

1-800-335-2572

Get free CLE credits on our website!
www.lclpa.org

Explore the Disciplinary Board's Lawyer Well-Being Webpage

The Disciplinary Board's "[Lawyer Well-Being](#)" webpage connects Pennsylvania attorneys with pertinent resources, [articles](#), events, and CLE opportunities to better understand and support their mental health and well-being. To access the Board's "Lawyer Well-Being" page, visit padisiplinaryboard.org/for-attorneys/well-being.



LAWYER WELL-BEING

Connect to available resources to better understand and support mental health and well-being as they relate to the legal profession.

*Digital resources
Informative articles
Upcoming events
CLE opportunities*

 The DISCIPLINARY BOARD
of the Supreme Court of Pennsylvania

Lawyers Concerned for Lawyers is a confidential and safe resource for Pennsylvania attorneys and their family members who may be struggling with their mental health or substance use. Since 1988, LCL has confidentially assisted and supported thousands of individuals who have faced a myriad of challenges (including grief, stress, anxiety, depression, eating disorders, gambling problems, problematic alcohol or prescription drug use, etc.), helping them navigate through dark and difficult times. If you or someone you know is struggling, please call us. You may save a life.



There is help, and there is hope.



LAWYERS CONCERNED FOR LAWYERS
— PENNSYLVANIA —

lclpa.org | 1-888-999-1941

**Evaluation by a
healthcare professional**
Information and literature
Peer and staff support
Assistance with interventions
Recovery meetings
Online resources and CLE

Lawyers Concerned for Lawyers is a confidential assistance program for the Pennsylvania legal community and their family members. LCL may not report information about a subject attorney back to the Disciplinary Board.

Confidential 24/7 Helpline: 1-888-999-1941

Last year, the Supreme Court of Pennsylvania adopted amendments to the Pennsylvania Rules of Disciplinary Enforcement (Pa.R.D.E.) relating to confidentiality of proceedings, providing for three exceptions to the requirement of confidentiality under [Pa.R.D.E. 402\(d\)](#). Included in these exceptions is the allowance for Disciplinary Counsel to make a referral of an attorney to [Lawyers Concerned for Lawyers of Pennsylvania](#) (LCL) and share information as part of the referral. *However*, it is crucial to note that LCL may *not* report information about a subject attorney back to the Disciplinary Board. LCL is a **confidential** assistance program for the Pennsylvania legal community and their family members.

Around the Court



Pennsylvania Courts Honor Women on the Bench

In honor of March's Women's History Month, the Unified Judicial System [released](#) an infographic highlighting women judges throughout the Commonwealth. Currently, thirty-four percent of Pennsylvania's judges are women, including Supreme Court Chief Justice Debra Todd and Justices Christine Donohue and Sallie Updyke Mundy. Chief Justice Todd is, notably, the first woman to serve as Chief Justice in the over-three-hundred-year history of the PA Supreme Court.

The President Judges of both the Superior Court and Commonwealth Court are also women: Anne E. Lazarus and Renée Cohn Jubelirer, respectively.

Other notable history makers include Hon. Anne X. Alpern, the first woman to serve on the PA Supreme Court, and Hon. Sandra Schultz Newman, the first woman elected to the PA Supreme Court. Justice Newman [passed away](#) just last month.

Read the full press release and access a high-resolution version of the the graphic [here](#) on the UJS website.

As of February 2026 . . .

34% of Pennsylvania's commissioned judges are women.

Common Pleas Courts

men (281) vacancy (16)

37%
women (171)

Magisterial District Courts

men (352) vacancy (11)

28%
women (138)

Philadelphia Municipal Court

men (18) vacancy (0)

38%
women (11)

There are three women serving on the seven-member Pennsylvania Supreme Court:

Chief Justice Debra Todd
Justice Christine Donohue
Justice Sallie Updyke Mundy

Chief Justice Debra Todd is the first woman in the Pa Supreme Court's 300+ year history to serve as chief justice.

The majority of Superior and Commonwealth Court judges are women:

Superior Court
The president judge of Superior Court is **Anne E. Lazarus**.

12 women 3 men

Commonwealth Court
The president judge of Commonwealth Court is **Renée Cohn Jubelirer**.

7 women 2 men

15 women serve as president judges in Courts of Common Pleas.

Women Trailblazers of the Pa. Courts

In 1930, **Hon. Sara M. Soffel** became the first woman appointed as a judge in Pennsylvania (Allegheny County).

Appointed in 1961, **Hon. Anne X. Alpern** was the first female justice to serve on the Pennsylvania Supreme Court.

In 1972, **Hon. Genevieve Blatt** was the first woman judge appointed to the Commonwealth Court.

In 1981, **Hon. Phyllis Beck** was the first woman appointed to serve on the Pennsylvania Superior Court.

In 1987, **Hon. Doris Smith-Ribner** was the first African American woman elected to serve on the Commonwealth Court.

Appointed in 1988, **Hon. Juanita Kidd Stout** was the first African American female judge to serve on any state supreme court.

In 1995, **Hon. Sandra Schultz Newman** was the first female justice elected to serve on the Pennsylvania Supreme Court.

In 2008, **Hon. Cheryl Allen** was the first African American woman elected to serve on the Pennsylvania Superior Court.

In 2022, **Hon. Debra Todd** became the first woman to serve as chief justice of Pennsylvania.

Appointed by the Pennsylvania Supreme Court in 2023, **Andrea Tuominen** became the first woman attorney to hold the position of state court administrator.

**Data compiled February 2026.

AOPC

Supreme Court Historical Commission to Hold K-12 Student Contests

The Supreme Court of Pennsylvania Historical Commission [is inviting](#) students to join in the nation's 250th birthday celebration through the Commission's launch of essay and coloring contests. Both contests were designed to "[help] students expand their knowledge about the work and the role of the state court system."

Justice Sallie Updyke Mundy explains, "Civics education is the foundation of an informed and engaged citizenry. When students take part in opportunities focused on our courts, they gain a deeper understanding of the judicial branch and the role the courts play in protecting constitutional rights."

Open to all PA students ages five through eleven, the [coloring contest](#) asks students to create their own judge. Students can choose which judge they would like to color and design on their cartoon judge cutouts.

The [essay contest](#) is open to all PA students in grades three through twelve. Essays will be judged on "creativity, overall quality, and adherence to the questions." Students in grades three through five are asked to write on the importance of the Supreme Court of Pennsylvania, and students in grades six through twelve will consider, "Which Pennsylvania Supreme Court Justice inspires you and why?".

The deadline for both contests is **April 24, 2026**. Visit the PA Courts' [press release](#) or the contest flyers for more contest details and instructions for submission.

From the Pennsylvania Bar Association



March Updates from the Pennsylvania Bar Association

March is a time to recognize the women whose leadership and advocacy have shaped Pennsylvania's legal system and strengthened communities across the Commonwealth. It's an opportunity to celebrate the progress made, acknowledge the work still ahead, and highlight the stories that inspire future leaders. Visit the Pennsylvania Bar Association's social media channels throughout the month for features, resources, and ways to get involved.



March 9-13: Expanding Civic Understanding Across PA through Civics Learning Week

In partnership with the Rendell Center, the PBA focuses on Civics Learning Week with the goal of bringing meaningful civic education to classrooms across PA. Volunteer attorneys and judges read books via Zoom, such as *What Can a Citizen Do?*, *Democracy for Dinosaurs*, and *Her Right Foot*, sparking conversations about citizenship, community responsibility, and the rule of law.

These sessions help students build foundational civic knowledge while giving them the chance to interact with members of the legal profession. For more information or to volunteer: rendellcenter.org/civics-learning.

March 27-28: Heading Toward the Finals of the Statewide Mock Trial Competition

Thank you to the many volunteer attorneys, judges, and coordinators who make this program possible. The PBA/YLD Statewide High School Mock Trial Competition continues its exciting march toward the championship. More than 290 teams from across the Commonwealth participate each year, making it one of the largest programs of its kind in the nation.

Students take on roles as attorneys and witnesses, presenting cases before real judges and juries. The Pennsylvania State Championship Weekend will be held March 27th-28th. The top teams will compete for the honor of representing PA at the National High School Mock Trial Championship in Iowa.

For more information, visit pabar.org/site/For-the-Public/Mock-Trial-Competition.

Please note that the Disciplinary Board of the Supreme Court of Pennsylvania and the Pennsylvania Bar Association (PBA) are separate organizations. For more information about PBA, visit pabar.org or follow on Facebook, Instagram, and LinkedIn.

We Want To Hear From You...

We are always on the lookout for stories of interest relating to legal ethics, new issues in the practice of law, lawyer wellness, and funny or just plain weird stories about the legal profession. If you come across something you think might be enlightening, educational, or entertaining to our readers or social media followers, [pass it along](#). If you are our original source, there may be a hat tip in it for you.

Resources

[Pending Cases](#)

[Recent Cases](#)

[Case Research Collection](#)

[Attorney Gateway](#)

[Rules](#)

[Search Opinions](#)

[FAQs – For the Public](#)

[FAQs – For Attorneys](#)

[Lawyer Well-Being](#)

[Pro Bono](#)

[Annual Report](#)

[Discipline Statistics](#)

[PA CLE Board](#)

Copyright (C) 2026 The Disciplinary Board of the Supreme Court of Pennsylvania. All rights reserved.

Disciplinary Board of the Supreme Court of Pennsylvania,
601 Commonwealth Avenue, Suite 5600, PO Box 62625, Harrisburg, PA 17106