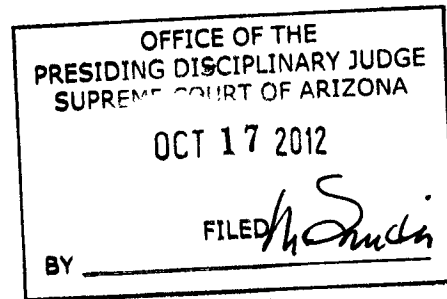


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Respondent's Counsel

**BEFORE THE PRESIDING DISCIPLINARY JUDGE
OF THE SUPREME COURT OF ARIZONA**

**IN THE MATTER OF A MEMBER OF THE
STATE BAR OF ARIZONA,**

**Lynn A. Keeling,
Bar No. 015130,**

Respondent.

PDJ-2012- 9101

**AGREEMENT FOR DISCIPLINE
BY CONSENT (PRE-FILING)**

State Bar No. 11-0292

The State Bar of Arizona, through undersigned Bar Counsel, and Respondent Lynn A. Keeling, who is represented in this matter by counsel Denise M. Quinterri, hereby submit their Tender of Admissions and Agreement for Discipline by Consent, pursuant to Rule 57(a), Ariz. R. Sup. Ct. Respondent voluntarily waives the right to an adjudicatory hearing on the complaint, unless otherwise ordered, and waives all motions, defenses, objections or requests which have been made or raised, or could be asserted thereafter, if the conditional admission and proposed form of discipline is approved.

Respondent conditionally admits that her conduct, as set forth below, violated Rule 42, ERs 1.1, 1.3, 3.1, 3.2, and 8.4(d). Upon acceptance of this

agreement, Respondent agrees to accept imposition of the following discipline: Admonition and Probation (CLE within six months). Respondent shall complete six hours of continuing legal education ("CLE"), in addition to her annual 15-hour requirement, in the area of Arizona Rules of Civil Procedure, with a focus on pleadings and motions. Respondent shall provide bar counsel with evidence of completion of the program(s) by providing copies of handwritten notes within six months. Respondent shall be responsible for the cost of the CLE program(s).

NON-COMPLIANCE LANGUAGE

In the event that Respondent fails to comply with any of the foregoing probation terms, and information thereof is received by the State Bar of Arizona, Bar Counsel shall file a notice of noncompliance with the Presiding Disciplinary Judge, pursuant to Rule 60(a)(5), Ariz. R. Sup. Ct. The Presiding Disciplinary Judge may conduct a hearing within 30 days to determine whether a term of probation has been breached and, if so, to recommend an appropriate sanction. If there is an allegation that Respondent failed to comply with any of the foregoing terms, the burden of proof shall be on the State Bar of Arizona to prove noncompliance by a preponderance of the evidence.

Respondent also agrees to pay the costs and expenses of the disciplinary proceeding.¹ The State Bar's Statement of Costs and Expenses is attached hereto as Exhibit "A."

COUNT ONE of ONE (State Bar File No. 11-0292)

FACTS

¹ Respondent understands that the costs and expenses of the disciplinary proceeding include the costs and expenses of the State Bar of Arizona, the Disciplinary Clerk, the Probable Cause Committee, the Presiding Disciplinary Judge and the Supreme Court of Arizona.

1. At all times relevant, Respondent was a lawyer licensed to practice law in the state of Arizona having been first admitted to practice in Arizona on October 23, 1993.

2. Georgia Deason was widowed in 1992 and became the sole owner of her home. She met Gene Stowell in 1993, and he moved into the home with Georgia in 1994. In July 1997 Georgia executed a will leaving all of her property to her children. In September 1997, Georgia and Gene married. In October 1997, Georgia and Gene took out a home equity loan secured by the home. A title company requirement for the transaction was that title vest in Georgia and Gene as joint tenants with rights of survivorship. This contradicted Georgia's will.

3. In 2002, Georgia's health declined so she executed a General Durable Financial Power of Attorney appointing her daughter Patricia agent to buy and sell Georgia's property. By July 2003, Georgia was at home terminally ill on her deathbed.

4. Anticipating that on Georgia's death Gene would own the home free and clear, contrary to Georgia's express wishes in her will, Georgia's children allegedly persuaded Gene to join Georgia (through Patricia) and convey their interest in the home to Gene and to Georgia's son, William. On July 5, Gene and Georgia allegedly executed a quit-claim deed conveying the home to Gene and William. Gene allegedly signed the deed personally, while Patricia signed for Georgia via the power of attorney.

5. Complainant Donna Burt, who is Georgia's sister-in-law and also is a notary, claims to have witnessed the signatures. In her notary log, however, while she identified "signatures" for Gene and Georgia in the spaces reserved for their

signatures, neither Gene (for himself) nor Patricia (for Georgia) actually signed. Also, the log shows that Gene identified himself by his driver's license, but no license number appears.

6. In litigation that later ensued between William and Gene, William obtained a questioned documents expert's opinion that Gene did sign the quitclaim deed but did not sign the notary log. The parties obtained affidavits from family members present in the home on July 5 whose version of events conflicted as to whether it was possible for Gene to have signed the quitclaim deed given that allegedly he never left Georgia's side, and whether it was possible for Complainant to have witnessed the act given the allegedly brief time she was at the home.

7. The deed was not recorded until August 22, 2003. During the interval, other family members died. At a wake for them on August 2, with alcohol served, Gene was presented a deed to sign. He said that he declined to sign the deed, but Respondent contended that family members got him drunk and slipped him the deed while fraudulently representing it to be something else, and coerced his signature.

8. Respondent, representing Gene, theorized that family members prevailed upon Gene to sign the "July 5" deed after the fact, which explains why it was not recorded until August. According to Respondent, Complainant's role was to notarize the deed back-dated to July 5, and record the notarization in her log as best she could. This, in turn, explains why Complainant could not obtain Gene's signature or driver's license number for her log book.

9. In *Deason v. Stowell*, CV2008-030702, about four and one-half years after Georgia died, William Deason sued Gene Stowell alleging claims for partition,

waste, and quiet title. In December 2008 Respondent, representing Gene, filed an Answer and counterclaim against William. The counterclaim stated counts for fraud, taxes and partition, waste, and exploitation of a vulnerable adult.

10. After some motion practice and discovery, the court set disclosure and discovery deadlines, and scheduled a mediation and status conference for dates in June 2010. Through discovery and investigation, Respondent believed Gene had defenses and claims beyond those originally alleged. On March 14, 2010, Respondent filed a "Motion for Leave to Add Counterclaims and Defendants Related to the Property." In her motion and proposed "Answer" and "Counterclaims" she identified Gene as a counterclaimant not only against William but, also, against seven new "Counterdefendants" including Complainant. She claimed that discovery revealed support for crossclaims, counterclaims, and joinder (and cited irrelevant rules in support) whereas the correct designations should have been Gene as a third-party plaintiff and the new parties as third-party defendants. For the next eight months, Respondent continued to identify Gene as a counterclaimant not only as to William but, also, as to the seven other incorrectly identified "counterdefendants."

11. In the prayer for relief in her proposed Answer and Counterclaim, and in all subsequent amended pleadings that she filed, Respondent demanded that "Counterclaimants reimburse defendant for defendant's costs . . ." when she represented both the counterclaimant and defendant (a counterclaimant is a defendant by definition). She meant to demand that *counterdefendants* reimburse the counterclaimant (which also would have been incorrect at least as to the newly added parties).

12. William's counsel filed a response to Respondent's motion for leave to add counterclaims and defendants, and Respondent filed a "Reply to Response . . ." on April 13, 2010. In it, she attached another copy of her proposed "Answer and Counterclaim" as an exhibit which violated the prohibition against duplicative filings in Rule 5(g), Arizona Rules of Civil Procedure ("ARCP").

13. On April 7, 2010, William filed a Motion for Partial Summary Judgment. In format, it and the accompanying Separate Statement of Facts complied with Rule 56, ARCP. In Respondent's filing entitled "Gene Stowell's Statement of Material Facts in Dispute . . . Pursuant to ARCP 56.C.2" filed May 13, 2010, she listed those facts from William's motion that she disputed in a format that generally complies with Rule 56 ARCP. Following that list, however, she wrote a four-page narrative of "facts" that did not cite to specific portions of the case record as required by Rule 56(c)(2), ARCP. William filed a Motion to Strike the portion of Respondent's Separate Statement of Facts that did not comply with Rule 56. Ultimately, the court denied William's Motion for Summary Judgment, finding that there were genuine issues of material fact. It also denied William's Motion to Strike a portion of Respondent's statement of facts finding that "sufficient reference has been made to the record in the course of briefing."

14. On May 7, 2010, the court granted Respondent's motion to add counterclaims and defendants. The amended pleading that the court approved consisted of 53 numbered paragraphs over seven pages. On June 22, Respondent filed an "Amended Answer to Complaint . . ." that differed from the one she was authorized to file by prior court order. The amended answer was comprised of 155

paragraphs covering 20 pages and included allegations designed to cure perceived deficiencies raised in connection with William's motion for summary judgment.

15. On July 12, 2010, William moved to strike the amended pleading. Respondent did not file a response so on August 3, the court granted William's motion and struck Respondent's amended answer and counterclaims. On August 6, Respondent filed a motion to vacate the court's order on the ground that she had an agreement with opposing counsel to file her response to the motion to strike by August 9. She did have an email agreement with opposing counsel to that effect but (with apologies) did not notify the court due to "a substantial workload," "significant changes in office staff," and preparing for and taking the July California bar exam.

16. On August 9, 2010, Respondent filed her response to William's motion to strike. She admitted that she added affirmative defenses to her answer not included in the form of answer that the court previously approved, and she also added new exhibits to the answer that allegedly supported her newly-added affirmative defenses. While agreeing that "a better action" would have been to file the amended answer and counterclaim in the court-authorized form, she nevertheless argued that all parties were served by the unauthorized pleading, had notice of its content, and therefore would suffer no prejudice were the as-filed pleading allowed to stand.

17. The court did vacate its August 3 order striking Respondent's answer and counterclaim "after proper notice and review." On September 9, 2010, however, the court granted William's motion to strike the amended answer and

counterclaim on the ground that "The pleading filed varies substantially from the proposed pleading submitted to and approved by the Court."

18. Respondent filed the approved answer and counterclaim on September 15, 2010. She continued to misidentify the parties and continued to ask for relief against the counterclaimants when she represented the counterclaimants.

19. On September 16, 2010, Complainant's lawyer emailed Respondent, noting that there is a difference between a counterclaim and third-party claim. He told Respondent he would file a motion to dismiss for both procedural and substantive reasons. On September 30, 2010, Respondent filed a motion entitled "Motion for Leave for Second Amended Answer and Counterclaims" but not for leave to add a third-party complaint. In the body of the motion, she stated that she wished to redesignate erroneously-termed counterclaims as third-party complaints. In her memorandum, she repeated her contention made in connection with her first attempted amendment of pleadings that Rule 13(h) ARCP relating to joinder of additional parties to counterclaims and crossclaims somehow was relevant to third-party complaints. Additionally, in her proposed second amended pleading, she deleted from the caption the correctly-labeled counterclaim against William and, instead, erroneously labeled him a third-party defendant.

20. On October 12, counsel for plaintiff/counterdefendant William, and counsel for third-party defendants other than Complainant, filed a notice of non-objection to Respondent's motion. In it, he correctly identified the parties as plaintiff William v. defendant Gene, counterclaimant Gene v. counterdefendant William, and third-party plaintiff Gene v. third party defendants Complainant and others. On October 20, 2010, the court granted the motion; however, at no time

did Respondent ever obtain leave of court to actually add Complainant to the case as a third-party defendant in the proper way, pursuant to Rule 14 ARCP.

21. On October 26, 2010, Respondent had a summons issued that identified her as counsel for counterclaimant, and did not identify Complainant as either a counterdefendant or a third-party defendant. On October 29, Respondent had Complainant served with the Summons and Complaint, First Amended Answer (but not the original answer and counterclaim or reply to the counterclaim, as required by Rule 14 ARCP), Minute Entry Granting Motion for Leave for Second Amended Answer, Motion for Leave for Second Amended Answer with Electronic Filing, First Request for Admissions, and Interrogatories. The Second Amended Answer and Counterclaims, however, although authorized by the court on October 20, had not yet been filed.

22. On November 11, 2010, Respondent filed the second amended answer and counterclaims using the same incorrect lineup of parties she employed previously. It erroneously was dated October 11, and the certificate of mailing erroneously shows that a copy was mailed and emailed March 12, 2010 to Complainant (among others).

23. Complainant, through counsel, filed a motion to dismiss on November 12, and asked for sanctions against Respondent.

24. Also on November 12, Respondent filed a Third Amended Answer and Counterclaims. It included 55 paragraphs over eight pages and was erroneously dated September 30, 2010. Attached to it as Exhibit I was another version of a Third Amended Answer with Counterclaims and Affirmative Defenses. That one included 153 paragraphs over 52 pages, identified wrong filing (September 22,

2010) and mailing (March 12, 2010) dates, and included a four-page, random "cut and paste" of excerpts of a legal memorandum Respondent filed earlier in the case.

25. Since Respondent neither sought nor was granted leave of court to file a third amended answer, etc., on November 19 counsel for William and the non-Complainant third-party defendants filed a motion to dismiss. They, too, requested that the court assess sanctions against Respondent. On November 22, Respondent filed a "Notice of Withdrawing Third Amended Answer Misfiled Without the Motion", acknowledging the error. The longer version of the third amended answer was the proposed pleading that was supposed to be attached to a motion. Instead, she mistakenly attached the proposed pleading to a copy of the Second Amended Answer.

26. On December 2, 2010, the parties attended a settlement conference. Complainant's attorney fees were \$4,999.68. An agreement was reached by which Complainant was dismissed from the litigation with prejudice with payment to her of \$1,500 each from William and Gene. All other claims were mutually dismissed. Gene was to buy out William for \$50,000 if Gene could qualify for a loan; otherwise, the home was to be sold and the proceeds divided 47.5% to William and 52.5% to Gene.

CONDITIONAL ADMISSIONS

Respondent's admissions are being tendered in exchange for the form of discipline stated below and is submitted freely and voluntarily and not as a result of coercion or intimidation.

Respondent conditionally admits that her conduct violated Rule 42, Ariz. R. Sup. Ct., specifically ERs 1.1, 1.3, 3.1, 3.2, and 8.4(d).

CONDITIONAL DISMISSALS

The State Bar conditionally agrees to dismiss charges that Respondent violated ER 3.4(c) and former Rule 53(c) (in effect at the time of the underlying conduct). ER 3.4(c) has a "knowingly" component while the former Rule 53(c) is violated, if at all, only "willfully." The State Bar conditionally agrees that the evidence is not clear and convincing that Respondent conducted herself in the underlying matter with either mental state.

RESTITUTION

Restitution is not an issue in this matter.

SANCTION

Respondent and the State Bar of Arizona agree that based on the facts and circumstances of this matter, as set forth above, the following sanction is appropriate: Admonition and probation for six months. Respondent shall complete six hours of continuing legal education ("CLE"), in addition to her annual 15-hour requirement, in the area of Arizona Rules of Civil Procedure, with a focus on pleadings and motions. Respondent shall provide bar counsel with evidence of completion of the program(s) by providing copies of handwritten notes within six months. Respondent shall be responsible for the cost of the CLE program(s).

LEGAL GROUNDS IN SUPPORT OF SANCTION

In determining an appropriate sanction, the parties consulted the American Bar Association's *Standards for Imposing Lawyer Sanctions (Standards)* pursuant to Rule 57(a)(2)(E). The *Standards* are designed to promote consistency in the imposition of sanctions by identifying relevant factors that courts should consider and then applying those factors to situations where lawyers have engaged in

various types of misconduct. *Standards* 1.3, Commentary. The *Standards* provide guidance with respect to an appropriate sanction in this matter. *In re Peasley*, 208 Ariz. 27, 33, 35, 90 P.3d 764, 770 (2004); *In re Rivkind*, 162 Ariz. 154, 157, 791 P.2d 1037, 1040 (1990).

In determining an appropriate sanction consideration is given to the duty violated, the lawyer's mental state, the actual or potential injury caused by the misconduct and the existence of aggravating and mitigating factors. *Peasley*, 208 Ariz. at 35, 90 P.3d at 772; *Standard* 3.0.

The duty violated

As described above, Respondent's conduct violated her duties to her client and the legal system.

The lawyer's mental state

For purposes of this agreement the parties agree that Respondent negligently conducted herself in the above-described manner, in violation of the Rules of Professional Conduct.

The extent of the actual or potential injury

For purposes of this agreement, the parties agree that there was actual and potential harm to the client and legal system.

The parties agree that the following *Standards* are appropriate given the facts and circumstances of this matter:

Standard 4.43: Reprimand is generally appropriate when a lawyer is negligent and does not act with reasonable diligence in representing a client, and causes injury or potential injury to a client.

Standard 4.53: Reprimand is generally appropriate when a lawyer:

(a) demonstrates failure to understand relevant legal doctrines or procedures and causes injury or potential injury to a client; or

(b) is negligent in determining whether he or she is competent to handle a legal matter and causes injury or potential injury to a client.

Standard 6.23: Reprimand is generally appropriate when a lawyer negligently fails to comply with a court order or rule, and causes injury or potential injury to a client or a party, or interference or potential interference with a legal proceeding.

Aggravating and mitigating circumstances

The presumptive sanction in this matter is reprimand. The parties conditionally agree that the following aggravating and mitigating factors should be considered.

Aggravating factors include:

- (c) a pattern of misconduct;
- (d) multiple offenses;
- (i) substantial experience in the practice of law;

Mitigating factors include:

- (a) absence of a prior disciplinary record;
- (b) absence of a dishonest or selfish motive;
- (e) full and free disclosure to a disciplinary board or cooperative attitude toward proceedings;
- (l) remorse;

Discussion

The parties have conditionally agreed that a greater or lesser sanction would not be appropriate under the facts and circumstances of this matter. While the presumptive sanction is reprimand, Respondent's mitigating factors outweigh the aggravating factors. Also, the aggravating factors of "pattern of misconduct" and "multiple offenses" occurred in a single course of litigation that for Respondent was procedurally complex. Finally, the Attorney Discipline Probable Cause Committee ("ADPCC") issued an Order of Admonition and Probation with six months of CLE for the listed violations plus for violations of ER 3.4(c) and former Supreme Court Rule

53(c). Respondent declined to accept that order and demanded formal proceedings because she disagrees that she acted with a "knowing" or "willful" mental state. Upon further discussion, the parties agree that a fair resolution of this matter is to excise the "knowing" (ER 3.4(c)) and "willful" (Rule 53(c)) violations from the ADPCC order and to adopt the ADPCC order in all other substantive respects. Based on the *Standards* and in light of the facts and circumstances of this matter, the parties conditionally agree that the sanction set forth above is within the range of appropriate sanction and will serve the purposes of lawyer discipline.

CONCLUSION

The object of lawyer discipline is not to punish the lawyer, but to protect the public, the profession and the administration of justice. *Peasley, supra* at ¶ 64, 90 P.3d at 778. Recognizing that determination of the appropriate sanction is the prerogative of the Presiding Disciplinary Judge, the State Bar and Respondent believe that the objectives of discipline will be met by the imposition of the proposed sanction of Admonition and Probation (CLE within six months) and the imposition of costs and expenses. A proposed form order is attached hereto as Exhibit "B."

DATED this 17th day of October, 2012.


STATE BAR OF ARIZONA




David L. Sandweiss
Senior Bar Counsel

This agreement, with conditional admissions, is submitted freely and voluntarily and not under coercion or intimidation.


DATED this 16 day of October, 2012.


Lynn A. Keeling
Respondent

DATED this 14th day of October, 2012.


Denise M. Quinterri
Counsel for Respondent

Approved as to form and content:


Maret Vessella
Chief Bar Counsel

Original filed with the Disciplinary Clerk
of the Office of the Presiding Disciplinary Judge
this 17th day of October, 2012.

Copies of the foregoing mailed/emailed
this 17th day of October, 2012, to:

Denise M. Quinterri
The Law Office of Denise M Quinterri PLLC
4802 E. Ray Rd., Ste. 23-419
Phoenix, AZ 85044-6417
Email: dmq@azethicslaw.com
Respondent's Counsel

Copy of the foregoing emailed
this 17th day of October, 2012, to:

William J. O'Neil
Presiding Disciplinary Judge
Supreme Court of Arizona
Email: officepdj@courts.az.gov
lhopkins@courts.az.gov

Copy of the foregoing hand-delivered
this 17th day of October, 2012, to:

Lawyer Regulation Records Manager
State Bar of Arizona
4201 North 24th Street, Suite 100
Phoenix, Arizona 85016-6266

By: *Rodney T. Baud*
DLS:dds

EXHIBIT A

Statement of Costs and Expenses

In the Matter of a Member of the State Bar of Arizona,
Lynn A. Keeling, Bar No. 015130, Respondent

File No. 11-0292

Administrative Expenses

The Supreme Court of Arizona has adopted a schedule of administrative expenses to be assessed in lawyer discipline. If the number of charges/complainants exceeds five, the assessment for the general administrative expenses shall increase by 20% for each additional charge/complainant where a violation is admitted or proven.

Factors considered in the administrative expense are time expended by staff bar counsel, paralegal, secretaries, typists, file clerks and messenger; and normal postage charges, telephone costs, office supplies and all similar factors generally attributed to office overhead. As a matter of course, administrative costs will increase based on the length of time it takes a matter to proceed through the adjudication process.

General Administrative Expenses for above-numbered proceedings

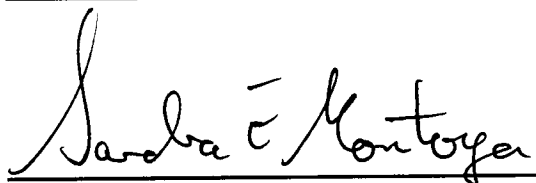
\$1,200.00

Additional costs incurred by the State Bar of Arizona in the processing of this disciplinary matter, and not included in administrative expenses, are itemized below.

Staff Investigator/Miscellaneous Charges

Total for staff investigator charges \$ 0.00

TOTAL COSTS AND EXPENSES INCURRED **\$1,200.00**



Sandra E. Montoya
Lawyer Regulation Records Manager

10-11-12
Date

EXHIBIT B

**BEFORE THE PRESIDING DISCIPLINARY JUDGE
OF THE SUPREME COURT OF ARIZONA**

**IN THE MATTER OF A MEMBER OF THE
STATE BAR OF ARIZONA,**

**Lynn A. Keeling,
Bar No. 015130,**

Respondent.

PDJ-2012- 9101

FINAL JUDGMENT AND ORDER

State Bar No. 11-0292

COPY

The undersigned Presiding Disciplinary Judge of the Supreme Court of Arizona, having reviewed the Agreement for Discipline by Consent filed on October 17, 2012, pursuant to Rule 57(a), Ariz. R. Sup. Ct., hereby accepts the parties' proposed agreement. Accordingly:

IT IS HEREBY ORDERED that Respondent, **Lynn A. Keeling**, is hereby admonished for her conduct in violation of the Arizona Rules of Professional Conduct, as outlined in the consent documents, effective _____.

IT IS FURTHER ORDERED that Respondent is hereby placed on probation for a period of six months. Respondent shall complete six hours of continuing legal education ("CLE"), in addition to her annual 15-hour requirement, in the area of Arizona Rules of Civil Procedure, with a focus on pleadings and motions. Respondent shall provide bar counsel with evidence of completion of the program(s) by providing copies of handwritten notes within six months. Respondent shall be responsible for the cost of the CLE program(s).

NON-COMPLIANCE LANGUAGE

In the event that Respondent fails to comply with any of the foregoing probation terms, and information thereof is received by the State Bar of Arizona, Bar Counsel shall file a notice of noncompliance with the Presiding Disciplinary Judge, pursuant to Rule 60(a)(5), Ariz. R. Sup. Ct. The Presiding Disciplinary Judge may conduct a hearing within 30 days to determine whether a term of probation has been breached and, if so, to recommend an appropriate sanction. If there is an allegation that Respondent failed to comply with any of the foregoing terms, the burden of proof shall be on the State Bar of Arizona to prove noncompliance by a preponderance of the evidence.

IT IS FURTHER ORDERED that Respondent pay the costs and expenses of the State Bar of Arizona in the amount of \$1,200.00.

IT IS FURTHER ORDERED that Respondent shall pay the costs and expenses incurred by the disciplinary clerk and/or Presiding Disciplinary Judge's Office in connection with these disciplinary proceedings in the amount of

_____.

DATED this _____ day of October, 2012.

COPY

The Honorable William J. O'Neil
Presiding Disciplinary Judge

Original filed with the Disciplinary Clerk
of the Office of the Presiding Disciplinary Judge
of the Supreme Court of Arizona
this _____ day of October, 2012.

Copies of the foregoing mailed/emailed
this _____ day of October, 2012, to:

Denise M. Quinterri
The Law Office of Denise M Quinterri PLLC
4802 East Ray Road,
Suite 23-419
Mesa, Arizona 85044-6417
Email: dmg@azethicslaw.com
Respondent's Counsel

COPY

Copy of the foregoing hand-delivered/emailed
this _____ day of October, 2012, to:

David L. Sandweiss
Senior Bar Counsel
State Bar of Arizona
4201 North 24th Street, Suite 100
Phoenix, Arizona 85016-6266
Email: lro@staff.azbar.org

Lawyer Regulation Records Manager
State Bar of Arizona
4201 North 24th Street, Suite 100
Phoenix, Arizona 85016-6266

By: _____