

IN THE
SUPREME COURT OF THE STATE OF ARIZONA
BEFORE THE OFFICE OF THE PRESIDING DISCIPLINARY JUDGE
1501 W. WASHINGTON, SUITE 102, PHOENIX, AZ 85007-3231

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

**LYNN A. KEELING,
Bar No. 015130**

Respondent.

PDJ-2014-9059

FINAL JUDGMENT AND ORDER

[State Bar No. 12-3224]

FILED JULY 24, 2014

The undersigned Presiding Disciplinary Judge of the Supreme Court of Arizona, having reviewed the Agreement for Discipline by Consent filed on July 11, 2014, 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 Reprimanded for her conduct in violation of the Arizona Rules of Professional Conduct, as outlined in the consent documents effective the date of this Order.

IT IS FURTHER ORDERED that Respondent pay the costs and expenses of the State Bar of Arizona in the amount of \$1,751.50. There are no costs or expenses incurred by the disciplinary clerk and/or Presiding Disciplinary Judge's Office in connection with these disciplinary proceedings.

DATED this 24th day of July, 2014.

William J. O'Neil

**William J. O'Neil, Presiding Disciplinary
Judge**

Copies of the foregoing mailed/emailed
this 24th day of July, 2014.

Ms. Denise M. Quinterri
The Law Office of Denise M. Quinterri PLLC
4802 E. Ray Rd., Ste. 23-419
Phoenix, AZ 85044-6417
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Respondent's Counsel

David L. Sandweiss
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Lawyer Regulation Records Manager
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by: MSmith

IN THE
SUPREME COURT OF THE STATE OF ARIZONA
BEFORE THE OFFICE OF THE PRESIDING DISCIPLINARY JUDGE
1501 W. WASHINGTON, SUITE 102, PHOENIX, AZ 85007-3231

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

LYNN A. KEELING,
Bar No. 015130

Respondent.

No. PDJ-2014-9059

**REPORT ACCEPTING CONSENT
FOR DISCIPLINE**

[State Bar No. 12-3224]

FILED JULY 24, 2014

An Agreement for Discipline by Consent (Agreement) filed on July 11, 2014, was submitted pursuant to Rule 57 of the Rules of the Arizona Supreme Court. Pursuant to that rule the parties may tender an agreement regarding a respondent against whom a formal complaint has been filed. In this matter, a Probable Cause Order was filed on May 15, 2014. No formal complaint has been filed. Such tender is a conditional admission of unethical conduct in exchange for a stated form of discipline, other than disbarment.

Bar Counsel provided notice of this Agreement to the complainant(s) by letter on July 7, 2014. Complainants were notified of the opportunity to file a written objection to the Agreement with the State Bar within five (5) business days of bar counsel's notice. An objection was filed on July 15, 2014. The Complainant stated that the sanction was insufficient, Ms. Keeling should not be allowed to continue to practice law, and should not be allowed to retain her earned fees. Respondent's violations were negligent and the presumptive sanction for the conditional admissions

is reprimand. The aggravation and mitigation factors present in this matter do not justify an increase or a decrease in the degree of discipline to be imposed.

Upon filing such agreement, the presiding disciplinary judge, "shall accept, reject or recommend modification of the agreement as appropriate". Accordingly,

IT IS ORDERED incorporating by this reference the Agreement and any supporting documents by this reference. The agreed upon sanctions include reprimand and costs of these proceedings.

IT IS ORDERED the Agreement is accepted. A proposed final judgment and order was submitted simultaneously with the Agreement. Costs as submitted are approved in the amount of \$1,751.50. The proposed final judgment and order having been reviewed are approved as to form. Now therefore, the final judgment and order is signed this date.

DATED this 24th day of July, 2014

William J. O'Neil

William J. O'Neil, Presiding Disciplinary Judge

COPY of the foregoing e-mailed/mailed
this 24th day of July, 2014, to:

David L. Sandweiss
Senior Bar Counsel
State Bar of Arizona
4201 N. 24th Street, Suite 100
Phoenix, AZ 85016-6266
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Respondent's Counsel

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

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

**MS LYNN A KEELING,
Bar No. 015130,**

Respondent.

PDJ-2014-_____

**AGREEMENT FOR DISCIPLINE BY
CONSENT**

State Bar No. 12-3224

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. A Probable Cause Order was entered on May 15, 2014, but no formal complaint has been filed. Respondent voluntarily waives the right to an adjudicatory hearing, 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.

Pursuant to Rule 53(b)(3), Ariz. R. Sup. Ct., notice of this agreement was provided to the complainants by letter on July 7, 2014. Complainants have been notified of the opportunity to file a written objection to the agreement with the State Bar within five (5) business days of bar counsel's notice.

Respondent conditionally admits that her conduct, as set forth below, violated Rule 42, ERs 1.3 (Diligence), 1.5 (Fees), 1.8 (Conflict of Interest-Current Clients), 3.2 (Expediting Litigation), and 8.4(d) (Conduct Prejudicial to the Administration of Justice). Upon acceptance of this agreement, Respondent agrees to accept imposition of the following discipline: Reprimand. 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
File no. 12-3224/ Lyons

1. At all times relevant, Respondent was a lawyer licensed to practice law in the state of Arizona having been first admitted to practice on October 23, 1993.
2. Donald and Vada Bardsley were married. Vada had an affair with Harold Lyons and gave birth to Louis. Donald and Vada gave Louis the Bardsley last name.
3. Donald and Vada divorced in 1957 and Vada married Harold. Both she and Louis then took Lyons as their last names.
4. Louis married Collette and they lived with Vada in her and Harold's Arizona home.

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.

5. Vada died intestate in 2005; her half of the house was the only meaningful asset.

6. Under intestacy laws if Louis were Donald Bardsley's son he would have inherited a one-half interest in the house. If Louis were Harold Lyons' son Harold would inherit the entire house.

7. Louis and his wife Collette had claims against Vada's estate for legal fees, funeral expenses, and for their personal household items.

8. In 2006, Harold returned home after being away for a while, and had himself appointed personal representative of Vada's estate, based upon statutory priority.

9. Harold obtained a \$50,000 loan secured by the house.

10. Arguments between Harold, Louis, and Colette ensued. Louis and Harold Lyons represented themselves in probate court and violated many rules of procedure many times.

11. In February 2007, Maricopa County Superior Court Commissioner McCoy issued a minute entry restricting the sale of, or creation of any other interest in, the property without the filing of a petition.

12. In August 2007, Respondent entered an appearance for Harold in his capacity as personal representative.

13. Respondent obtained copies of the court filings and read them but did not make a mental note of the restriction against encumbering the property because it was not relevant to any pending issue or any issue that arose soon thereafter.

14. However, in her October 2008 response to Louis' motion to enforce a settlement agreement, Respondent expressly referred to that restriction.

15. In late 2009 and early 2010, Harold tried to get and ultimately obtained a reverse mortgage on the house. He used the money to pay both estate-related and personal expenses, as authorized by Arizona statute.

16. Respondent knew that Harold was trying to get the mortgage and asked him for updates so she could prepare an accurate inventory of assets and an accounting. She did not, however, help obtain the loan.

17. As of February 24, 2010, Harold owed Respondent \$33,367.90.

18. That day, Harold signed a "Lien Agreement Affidavit" that Respondent prepared authorizing Respondent to place a \$45,000 lien on the house to secure payments to her.

19. Respondent incorporated the terms of the lien agreement into a "Notice of Lien" that she signed on February 25, 2010, and recorded on March 1, 2010.

20. Respondent did not fully disclose and transmit in writing to Harold the lien transaction and terms in a manner that Harold could reasonably understand.

21. Respondent did not advise Harold in writing of the desirability of seeking, and did not give him a reasonable opportunity to seek, the advice of independent legal counsel on the lien transaction.

22. Respondent did not obtain from Harold written and signed informed consent to the essential terms of the lien transaction and Respondent's role in the transaction, including whether Respondent represented Harold in the transaction.

23. On March 19, 2010, Respondent signed and recorded a "Lien Release" by which she relinquished the lien recorded on March 1.

24. The document states: "The lien is being released as a professional courtesy to Louis and Collette Lyons."

25. Louis refused to undergo DNA testing to establish whether Harold Lyons or Donald Bardsley was his father.

26. At a June 2008 mediation, the parties agreed to resolve all issues. Harold was to pay Louis \$30,000--\$20,000 within 30 days and \$10,000 on an interest bearing note secured by a deed of trust on the house.

27. The mediator, Commissioner Anderson, stated on the record:

The compliance date agreed upon by the parties for this paperwork is June 27th and the Court has told the parties that if everything is approved it could be brought by here and I'll sign it the day I see it.... Ms. Keeling will be doing the paperwork and I believe that's it.

28. Respondent failed to prepare the "paperwork" although she did file a Notice of Settlement.

29. Harold was unable to obtain financing to pay \$20,000, and Respondent told that to Complainants.

30. Complainants filed a Motion to Enforce the Settlement but simultaneously filed an objection to the Notice of Settlement due to Harold's failure to comply with funding and circulate the "paperwork."

31. At an August 21, 2008 status hearing, Commissioner Kongable asked Complainants if they wanted to enforce the settlement or proceed to trial.

32. If they went to trial Louis would have to undergo DNA testing to which he objected.

33. If the court enforced the settlement Louis believed Harold would delay payment on the excuse that he did not have the needed money.

34. Louis equivocated over the court's questions so ultimately Commissioner Kongable set the case for trial, and ordered Louis to undergo the DNA testing.

35. The case was tried on December 10, 2008. The court determined (per results of the DNA testing) that Louis is Harold's son.

36. The court awarded \$32,200 to Complainants (funeral expenses and attorney fees), less \$5,000 for damaged personal property.

37. The court ordered Respondent to submit a proposed form of order for the court's approval and signature.

38. On December 24, 2009, Respondent submitted a proposed order granting Harold 100% ownership of the house but excluding the items stated in the court's December 2008 minute entry.

39. The court signed the order in January 2010.

40. Complainants filed an objection and request for formal proceedings claiming that Respondent failed to abide by the court's order in December 2008 to submit a form of order covering all of the matters decided.

41. Respondent filed a response in February 2010 claiming that a form of order that she prepared "never reached the court . . . due to staffing changes, and hosting interns. . . ."

42. The court set a hearing for March 11, 2010. Respondent filed a motion to vacate the hearing claiming that "lodging the order pursuant to the Minute Entry dated December 12, 2008 . . . was mistakenly not completed and has since been lodged"

43. The court signed the long-awaited order on March 11, 2010, 15 months after trial and the court directive to submit a form of order.

44. After litigating other issues (property valuation, inventory and appraisal, liability to repay income tax refund to the IRS, rent, interest, correction to funeral expense order) on June 20, 2012, Respondent filed her Affidavit of Attorney's Fees and Costs.

45. Respondent included charges for her and her office staff members' time at various hourly rates. Her rate was \$225/hr.; the paralegal rate was \$90/hr.

46. Since some of her entries were billed at an increased rate of \$300/hr. for her and \$110 and \$120/hr. for the paralegal without an intervening written communication of the change to Harold, she reduced her bill from a gross of \$77,534.99 to \$70,000.

47. The court conducted a hearing on July 2, 2012 and, on August 7, 2012, ruled on Respondent's affidavit.

48. Respondent had billed a law school graduate's time at a lawyer's rate of \$225/hr. for a total of \$22,000.

49. At the July 2 hearing, Respondent told the court that she would write off the clerk's time altogether, instead of just reducing the rate. This brought the bill to \$48,000.

50. In his August 7, 2012 minute entry, the judge stated that Harold paid about \$35,000, \$8,000 of which was incurred before the mediation "most of which was reasonable." According to the court's minute entry, Respondent's records showed "redundancy in billed work, some billings for purely administrative functions (including directions to couriers and copying), some work that was not necessary,

and some time entries where the time billed appears to be excessive in relation to the work that was actually performed.”

51. The court also noted that: “Much of the work billed benefitted Harold Lyons personally rather than the estate.”

52. The court concluded that \$37,500 was a reasonable amount of attorney’s fees for the estate to pay Respondent.

53. Respondent claims she did not expect the court to award her all the fees that she had listed in her billing statements and submitted with her affidavit. Respondent thought that what she was doing was fully disclosing the work performed. She thought that the rules require that an attorney itemize in a fee affidavit all activities in a case and let the court determine what is and is not reasonable or otherwise awardable.

CONDITIONAL ADMISSIONS

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

Respondent conditionally admits that her conduct violated Rule 42, ERs 1.3 (Diligence), 1.5 (Fees), 1.8 (Conflict of Interest-Current Clients), 3.2 (Expediting Litigation), and 8.4(d) (Conduct Prejudicial to the Administration of Justice).

RESTITUTION

Restitution is not an issue in this matter.

SANCTION

Respondent and the State Bar of Arizona conditionally agree that based on the facts and circumstances of this matter, as set forth above, the following sanction is appropriate: Reprimand.

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

The parties conditionally agree that Respondent violated her duties to her client (ERs 1.3, 1.5, and 1.8) and to the legal system (ERs 3.2 and 8.4(d)).

The Lawyer's Mental State

The parties conditionally agree that Respondent acted with a negligent mental state in violating the Rules of Professional Conduct.

The extent of the actual or potential injury

The parties conditionally agree that Respondent caused potential harm to her client and actual harm to the legal system and the public.

The parties agree that the following *Standards* are appropriate to this case:

ER 1.3 (Diligence)

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.

ER 1.5(a) (Fees)

Standard 4.63: Reprimand is generally appropriate when a lawyer negligently fails to provide a client with accurate or complete information, and causes injury or potential injury to the client.

ER 1.8 (Conflicts-Business Transaction with Client)

Standard 4.34: Admonition is generally appropriate when a lawyer engages in an isolated instance of negligence in determining whether the representation of a client may be materially affected by the lawyer's own interests, or whether the representation will adversely affect another client, and causes little or no actual or potential injury to a client.

ER 3.2 (Expedite Litigation) and 8.4(d) (Conduct Prej. to the Admin. of Justice)

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.

In aggravation: *Standard 9.22--*

(a) prior disciplinary offenses;

- October 29, 2012, SBA no. 11-0292, Admonition and Probation for six months (six hours of CLE on rules of procedure with focus on pleadings and motions) by consent, ERs 1.1, 1.3, 3.1, 3.2, and 8.4(d).

- March 11, 2010, SBA no. 09-1775, Diversion, ERs 1.1, 1.3, and 8.4(d), LOMAP for office procedures with a focus on competence, diligence, and stress and time management issues, and 12 hours of CLE in persuasive legal writing and litigating probate cases.

(c) a pattern of misconduct;

(d) multiple offenses; and

(i) substantial experience in the practice of law.

In mitigation: *Standard 9.32--*

(b) absence of a dishonest or selfish motive; and

(e) full and free disclosure to a disciplinary board or cooperative attitude toward proceedings.

Discussion

The parties conditionally agree that the presumptive sanction is reprimand and a greater or lesser sanction would not be appropriate. Respondent's discipline history might suggest that a more severe sanction is in order; however, some of her conduct pre-dated her participation in LOMAP and CLE programs necessitated by her previous cases. The education Respondent obtained from those cases, combined with a reprimand, should adequately 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 reprimand and the imposition of costs and expenses. A proposed form of order is attached hereto as Exhibit "B."

DATED this _____ day of July 2014.

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 10 day of July, 2014.



Lynn B. Keeling
Respondent

DATED this _____ day of July, 2014.

The Law Office of Denise M. Quinterri PLLC

Denise M. Quinterri
Counsel for Respondent

Approved as to form and content

Maret Vessella
Chief Bar Counsel

DATED this _____ day of July 2014.

State Bar of Arizona

David L. Sandweiss
Senior Bar Counsel

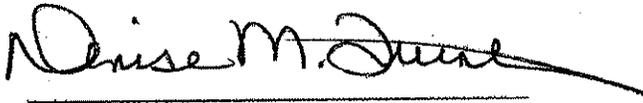
This agreement, with conditional admissions, is submitted freely and voluntarily and not under coercion or intimidation.

DATED this _____ day of July, 2014.

Lynn A. Keeling
Respondent

DATED this 9th day of July, 2014.

The Law Office of Denise M. Quinterri PLLC

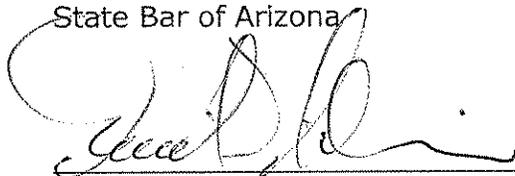


Denise M. Quinterri
Counsel for Respondent

Approved as to form and content

Maret Vessella
Chief Bar Counsel

DATED this 11th day of July 2014.

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 _____ day of July, 2014.

Lynn A. Keeling
Respondent

DATED this _____ day of July, 2014.

The Law Office of Denise M. Quinterri PLLC

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
of the Supreme Court of Arizona
this 11th day of July 2014.

Copies of the foregoing mailed/emailed
this 11th day of July 2014 to:

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

Copy of the foregoing emailed
this 11th day of July, 2014, 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 11th day of July, 2014, to:

Lawyer Regulation Records Manager
State Bar of Arizona
4201 N. 24th St., Ste. 100
Phoenix, Arizona 85016-6266

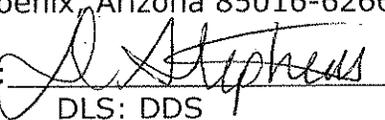
by: 
DLS: DDS

EXHIBIT "A"

Statement of Costs and Expenses

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

File No. 12-3224

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

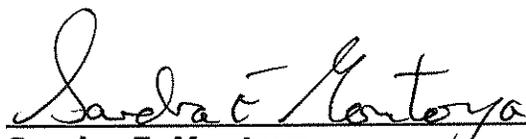
Additional costs incurred by the State Bar of Arizona in the processing of this disciplinary matter, and not included in administrative expenses, are itemized below.

Staff Investigator/Miscellaneous Charges

06/05/13 Reporting services, deposition \$ 551.50

Total for staff investigator/miscellaneous charges \$ 551.50

TOTAL COSTS AND EXPENSES INCURRED \$ 1,751.50



Sandra E. Montoya
Lawyer Regulation Records Manager

6-26-14

Date

EXHIBIT "B"

IN THE
SUPREME COURT OF THE STATE OF ARIZONA
BEFORE THE OFFICE OF THE PRESIDING DISCIPLINARY JUDGE
1501 W. WASHINGTON, SUITE 102, PHOENIX, AZ 85007-3231

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

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

Respondent.

PDJ-2014-_____

FINAL JUDGMENT AND ORDER

[State Bar No. 12-3224]

The undersigned Presiding Disciplinary Judge of the Supreme Court of Arizona, having reviewed the Agreement for Discipline by Consent filed on _____, 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 Reprimanded 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 pay the costs and expenses of the State Bar of Arizona in the amount of \$ _____, within thirty (30) days from the date of service of this Order.

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 _____, within thirty (30) days from the date of service of this Order.

DATED this _____ day of July, 2014.

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 July, 2014.

Copies of the foregoing mailed/emailed
this _____ day of July, 2014.

Ms. 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

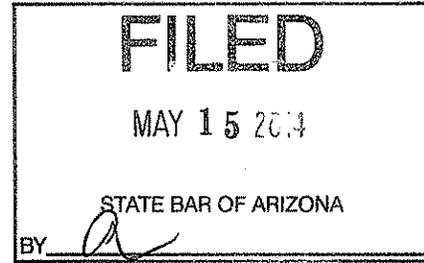
Copy of the foregoing emailed/hand-delivered
this _____ day of July, 2014, to:

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

Copy of the foregoing hand-delivered
this _____ day of July, 2014 to:

Lawyer Regulation Records Manager
State Bar of Arizona
4201 N. 24th St., Ste. 100
Phoenix, Arizona 85016-6266

by: _____



**BEFORE THE ATTORNEY DISCIPLINE
PROBABLE CAUSE COMMITTEE
OF THE SUPREME COURT OF ARIZONA**

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

No. 12-3224

**LYNN A. KEELING
Bar No. 015130**

PROBABLE CAUSE ORDER

Respondent.

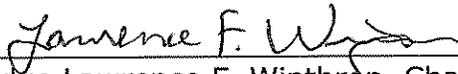
The Attorney Discipline Probable Cause Committee of the Supreme Court of Arizona ("Committee") reviewed this matter on May 9, 2014, pursuant to Rules 50 and 55, Ariz. R. Sup. Ct., for consideration of the State Bar's Report of Investigation and Recommendation, Respondent's Response and Complainant's Response.

By a vote of 8-0-1¹, the Committee finds probable cause exists to file a complaint against Respondent in File No. 12-3224.

IT IS THEREFORE ORDERED pursuant to Rules 55(c) and 58(a), Ariz. R. Sup. Ct., authorizing the State Bar Counsel to prepare and file a complaint with the Disciplinary Clerk.

Parties may not file motions for reconsideration of this Order.

DATED this 14 day of May, 2014.



Judge Lawrence F. Winthrop, Chair
Attorney Discipline Probable Cause
Committee of the Supreme Court of Arizona

¹ Committee member Jeffrey B. Messing did not participate in this matter.

Original filed this 15th day
of May, 2014, with:

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

Copy mailed this 15th day
of May, 2014, to:

Denise M. Quinterri
The Law Office of Denise M. Quinterri PLLC
4802 East Ray Road,
Suite 23-419
Phoenix, Arizona 85044-6417
Respondent's Counsel

Copy emailed this 15th day
of May, 2014, to:

Attorney Discipline Probable Cause Committee
of the Supreme Court of Arizona
1501 West Washington Street, Suite 104
Phoenix, Arizona 85007
E-mail: ProbableCauseComm@courts.az.gov

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

by: 