

IN THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, : No. 1889 Disciplinary Docket No. 3
Petitioner :
 : No. 107 DB 2012
v. :
 : Attorney Registration No. 92274
JENNIFER LYNCH JACKSON, :
Respondent : (Allegheny County)

ORDER

PER CURIAM:

AND NOW, this 30th day of January, 2013, upon consideration of the Recommendation of the Three-Member Panel of the Disciplinary Board dated October 24, 2012, the Joint Petition in Support of Discipline on Consent is hereby granted pursuant to Rule 215(g), Pa.R.D.E., and it is

ORDERED that Jennifer Lynch Jackson is suspended on consent from the Bar of this Commonwealth for a period of two years, the suspension is stayed in its entirety, and she is placed on probation for a period of two years subject to the condition that she shall fully comply with all Continuing Legal Education requirements prior to the due date for her Compliance Group 1, which is April 30th of each year.

A True Copy Patricia Nicola
As Of 1/30/2013

Attest: 
Chief Clerk
Supreme Court of Pennsylvania

BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA

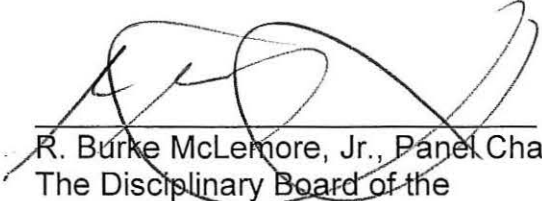
OFFICE OF DISCIPLINARY COUNSEL : No. 107 DB 2012
Petitioner :
v. : Attorney Registration No. 92274
JENNIFER LYNCH JACKSON :
Respondent : (Allegheny County)

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

The Three-Member Panel of the Disciplinary Board of the Supreme Court of Pennsylvania, consisting of Board Members R. Burke McLemore, Jr., David A. Nasatir and Jane G. Penny, has reviewed the Joint Petition in Support of Discipline on Consent filed in the above-captioned matter on September 24, 2012.

The Panel approves the Petition consenting to a two year suspension to be stayed in its entirety and a two year period probation subject to the conditions set forth in the Joint Petition and recommends to the Supreme Court of Pennsylvania that the attached Joint Petition be Granted.

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


R. Burke McLemore, Jr., Panel Chair
The Disciplinary Board of the
Supreme Court of Pennsylvania

Date: 10/24/2012

BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, :
: Petitioner : No. 107 DB 2012
: v. :
: JENNIFER LYNCH JACKSON, : Attorney Registration No. 92274
: Respondent : (Allegheny County)

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

OFFICE OF DISCIPLINARY COUNSEL

PAUL J. KILLION
CHIEF DISCIPLINARY COUNSEL

Susan N. Dobbins
Disciplinary Counsel
Suite 1300, Frick Building
437 Grant Street
Pittsburgh, PA 15219
(412) 565-3173

and

Jennifer Lynch Jackson
1809 West Street
Munhall, PA 15120
(412) 462-2506

FILED

SEP 24 2012

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

BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL,	:	
	:	
Petitioner	:	No. 107 DB 2012
	:	
v.	:	
	:	
JENNIFER LYNCH JACKSON,	:	Attorney Registration No. 92274
	:	
Respondent	:	(Allegheny County)

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

Petitioner, Office of Disciplinary Counsel, by Paul J. Killion, Chief Disciplinary Counsel, and Susan N. Dobbins, Disciplinary Counsel, and Respondent, Jennifer Lynch Jackson, file this Joint Petition in Support of Discipline on Consent Under Rule 215(d), Pa.R.D.E., and respectfully represent as follows:

1. Petitioner, whose principal office is located at Pennsylvania Judicial Center, Suite 2700, 601 Commonwealth Avenue, P.O. Box 62485, Harrisburg, PA 17106-2485, is invested, pursuant to Rule 207 of the Pennsylvania Rules of Disciplinary Enforcement (hereafter "Pa.R.D.E."), with the power and the duty to investigate all matters involving alleged misconduct of an attorney admitted to

practice law in the Commonwealth of Pennsylvania and to prosecute all disciplinary proceedings brought in accordance with the various provisions of the aforesaid Rules.

2. Respondent, Jennifer Lynch Jackson, was born on November 23, 1975. She was admitted to practice law in the Commonwealth of Pennsylvania on February 11, 2004. Respondent's attorney registration mailing address is 1809 West Street, Munhall, PA 15120.

3. Respondent is on active status. She is subject to the disciplinary jurisdiction of the Disciplinary Board of the Supreme Court of Pennsylvania.

SPECIFIC FACTUAL ALLEGATIONS ADMITTED

4. By a Preliminary Annual CLE Report dated February 17, 2011, sent to Respondent at her office address of 1809 West Street, Munhall, PA 15120-2532, the Pennsylvania Continuing Legal Education Board (hereinafter, PACLE) advised her, among other things, that:

(a) This Preliminary Report had been provided to inform Respondent of her status with the PACLE requirement as of February 3, 2011;

(b) PACLE records indicated that Respondent had "NOT YET COMPLIED" with the Continuing Legal Education (CLE) requirement due by April 30, 2011;

(c) Lawyers who did not complete their CLE requirement or receive an approved CLE exception by the compliance deadline would be considered non-compliant;

(d) This would result in the assessment of a \$100 late fee and subject her law license to PACLE Rule 111 related to administrative suspension;

(e) They strongly recommended she take action to satisfy her CLE requirements prior to the compliance deadline; and,

(f) Their office was available to assist her in achieving compliance.

5. By an Annual CLE Report dated June 24, 2011, sent to Respondent at her office located at 1809 West Street, Munhall, PA 15120-2532, the PACLE advised her, among other things, that:

(a) PACLE records indicated that she was "NON COMPLIANT" with the CLE requirement due by April 30, 2011;

(b) This Annual CLE Report was provided to inform Respondent of her status with the PACLE requirement for the compliance year 2011;

(c) Due to non-compliance with the CLE requirement, in accordance with the Rules for CLE in Pennsylvania, a \$100 late fee had been assessed;

(d) Failure to complete her CLE requirement and pay any outstanding late fees within sixty days from the date of this notice would result in the assessment of a second \$100 late fee and her name being included on a non-compliant report to the Supreme Court of Pennsylvania;

(e) They strongly encouraged her to take action to remedy this situation; and,

(f) Their office was available to assist her in achieving compliance.

6. By letter dated September 28, 2011, sent to Respondent at 1809 West Street, Munhall, PA 15120-2532, the PACLE informed her, among other things, that:

(a) This letter served as a second notification of "**non-compliance**" with the CLE requirement originally due on April 30, 2011;

(b) In accordance with the Rules for CLE in Pennsylvania, a second \$100 late fee had been assessed for continued non-compliance;

(c) Failure to complete her CLE requirement and pay any outstanding late fees by 4:00 p.m. on October 28, 2011, would result in her name being included on a non-compliant report to the Supreme Court of Pennsylvania;

(d) Upon receipt of this report, the Supreme Court would initiate an Order to administratively suspend her license to practice law in the Commonwealth of Pennsylvania and a third \$100 late fee would be assessed;

(e) They strongly encouraged her to remedy this situation before October 28, 2011; and,

(f) Their office was available to assist her in achieving compliance.

7. By Order of the Supreme Court of Pennsylvania dated November 21, 2011, Respondent was administratively suspended pursuant to Rule 111(b),

Pa.R.C.L.E., and it was further ordered that the suspension was effective thirty days after the date of that Order pursuant to Rule 217, Pa.R.D.E.

8. By letter dated November 21, 2011, sent to Respondent at 1809 West Street, Munhall, PA 15120-2532, by certified mail, return receipt requested, Suzanne E. Price, Attorney Registrar, informed her, among other things, that:

(a) The Prothonotary of the Supreme Court of Pennsylvania had forwarded to them a certified copy of the Order of Court dated November 21, 2011 (a copy was enclosed together with the applicable page containing her name) that she would be **Administratively Suspended** effective **December 21, 2011**, for failure to comply with the Pennsylvania Rules for Continuing Legal Education due April 30, 2011 (Compliance Group 1);

(b) If she was administratively suspended, she would be required to comply with Rule 217 of the Pa.R.D.E. and §§91.91-91.99 of the Disciplinary Board Rules, which were enclosed. A Standard Guidance to Lawyers Who have been Administratively Suspended, Forms DB-23(a) and DB-24(a) (Nonlitigation and Litigation Notice of Administrative Suspension) were also enclosed, together with Form DB-25(a), Statement of Compliance; and,

(c) In order to resume active status, she must comply with the PACLE Board before a request for reinstatement to the Disciplinary Board would be considered.

9. The letter dated November 21, 2011, sent to Respondent was signed for by Bonnie L. Kubancsek, a secretary in the office where Respondent uses office space.

10. Effective December 21, 2011, Respondent was administratively suspended by the Supreme Court of Pennsylvania.

11. Thereafter, Respondent did not comply with Rule 217 of the Pa.R.D.E. and §§91.91-91.99 of the Disciplinary Board Rules.

12. On December 22, 2011, in the case of *Jennifer Mayor vs. Scott J. Mayor*, filed at case No. FD-10-00-1931 in the Court of Common Pleas of Allegheny County, Pennsylvania, Respondent had a conversation with Attorney Dawn Gull on behalf of her client, Scott Mayor, in which she worked out the holiday custody schedule for the Mayors' children.

13. At that time, Respondent did not:

(a) Have an active law license and was not permitted to practice law in the Commonwealth of Pennsylvania;

(b) Advise Attorney Gull that she been placed on administrative suspension; or,

(c) Advise her client that she had been placed on administrative suspension.

14. By letter dated January 5, 2012, which was sent to the Honorable Donna Jo McDaniel as President Judge of the Court of Common Pleas of Allegheny County, Pennsylvania and copied to Respondent at the 1809 West Street address, Angelea Allen Mitas, Disciplinary Counsel-in-Charge of the Office of Disciplinary Counsel District IV Office, informed her, among other things, that:

(a) An Order of the Supreme Court of Pennsylvania had been entered which affected the ability to practice law of attorneys who may regularly practice in her county;

(b) As stated in the enclosed Order, Respondent, as well as other attorneys, had been administratively suspended, pursuant to Pennsylvania Rule for Continuing Legal Education 111(b);

(c) This Order was effective thirty days after its date; and,

(d) Thereafter, the named attorneys were forbidden from practicing law in this Commonwealth.

15. On January 10, 2012, Respondent represented Brian Jacobs at a Preliminary Hearing in front of Magisterial District Judge John N. Bova, at which time Judge Bova continued Mr. Jacobs' Preliminary Hearing until March 13, 2012, so that he could obtain further drug rehabilitation. Mr. Jacobs' matter was docketed at No. MJ-05218-CR-637-2011.

16. At that time, Respondent was not able to represent Mr. Jacobs since she was on administrative suspension and prohibited from engaging in the practice of law.

17. Respondent did not advise:

(a) Judge Bova that she was not permitted to represent Mr. Jacobs because she had been placed on administrative suspension;
or,

(b) Mr. Jacobs that she was not permitted to represent him because she had been placed on administrative suspension.

18. On January 10, 2012, Respondent represented Matthew James Engott at a Preliminary Hearing in front of Magisterial District Judge John N. Bova, at which time Mr. Engott waived the charges against him to Common Pleas Court. Mr. Engott's matter was docketed at No. MJ-05218-CR-746-2011.

19. At that time, Respondent was not able to represent Mr. Engott since she was on administrative suspension and prohibited from engaging in the practice of law.

20. Respondent did not advise:

(a) Judge Bova that she was not permitted to represent Mr. Engott because she had been placed on administrative suspension;

(b) Mr. Engott that she was not permitted to represent him because she had been placed on administrative suspension.

21. On January 11, 2012, Respondent represented Michael Liggett in regard to charges filed against him at criminal docket number 13732-2010 in the Court of Common Pleas of Allegheny County, Pennsylvania.

22. While in the courtroom of the Honorable David R. Cashman, Respondent negotiated a plea agreement with Assistant District Attorney John Schultz on behalf of her client, Mr. Liggett.

23. Respondent:

(a) Provided Mr. Liggett with legal advice in regard to the criminal charges filed against him;

(b) Assisted Mr. Liggett in completing his plea colloquy; and,

(c) Gave Mr. Liggett's completed plea colloquy to Judge Cashman's minute clerk, Joseph Panucci.

24. At that time, Respondent was not able to represent Mr. Liggett since she was on administrative suspension and prohibited from engaging in the practice of law.

25. On January 11, 2012, Respondent spoke with Investigator/Auditor Brian J. Kline of the Office of Disciplinary Counsel in regard to being placed on administrative suspension.

26. Respondent informed Mr. Kline, among other things, that:

(a) She had received a copy of a letter dated January 5, 2012, which had been sent to the Honorable Donna Jo McDaniel, indicating that she had been administratively suspended pursuant to Pennsylvania Rule for Continuing Legal Education 111(b); and,

(b) She thought the Order was effective thirty days after the date of the letter.

27. Mr. Kline:

(a) Provided Respondent with a copy of the Order of the Supreme Court of Pennsylvania dated November 21, 2011 and the letter dated

November 21, 2011 from Suzanne E. Price informing her, among other things, that she would be administratively suspended effective December 21, 2011, for failure to comply with the PACLE due April 30, 2011 (Compliance Group 1); and,

(b) Informed her that effective December 21, 2011, she was placed on Administrative Suspension and could not practice law in the Commonwealth of Pennsylvania.

28. Respondent informed Mr. Kline that she had taken some PACLE credits in December 2011 and thought she had complied with the amount of credits that she needed to be active.

29. Mr. Kline:

(a) Informed Respondent that according to the PACLE she had not taken the sufficient amount of credits to become active to practice law in Pennsylvania;

(b) Told her that she had to pay whatever costs were necessary to become active again;

(c) Also informed her that it would be best for her to contact the PACLE to see how many credits she needed to become active and how much money she owed to PACLE; and,

(d) Asked her if the signature on the return receipt card for the certified letter dated November 21, 2011 sent to her by Suzanne E. Price was her secretary's signature.

30. Respondent:

(a) Informed Mr. Kline that the signature on the return receipt card from the November 21, 2011 certified letter sent to her by Suzanne E. Price belonged to a secretary in her office;

(b) Did not deny receiving the November 21, 2011 certified letter from Ms. Price; and,

(c) Told Mr. Kline that she represented two defendants the prior day in Magistrate Court.

31. Respondent did not advise Mr. Liggett, the Honorable David R. Cashman, or Assistant District Attorney John Schultz that she was on administrative suspension and not permitted to represent Mr. Liggett until after she spoke with Mr. Kline of the Office of Disciplinary Counsel.

32. On January 20, 2012, Respondent was reinstated to active status to practice law in Pennsylvania.

SPECIFIC RULES OF PROFESSIONAL CONDUCT VIOLATED

33. By her conduct as set forth above, Respondent violated the following Rule of Professional Conduct and the Rules of Disciplinary Enforcement:

(a) Rule of Professional Conduct 5.5(a) – A lawyer shall not practice law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, or assist another in doing so.

(b) Rule of Disciplinary Enforcement 217(b) – A formerly admitted attorney shall promptly notify, or cause to be notified, by registered or certified mail, return receipt requested, all clients who are involved in pending litigation or administrative proceedings, and the attorney or attorneys for each adverse party in such matter or proceeding, of the disbarment, suspension, administrative suspension or transfer to inactive status and consequent inability of the formerly admitted attorney to act as an attorney after the effective date of the disbarment, suspension, administrative suspension or transfer to inactive status. The notice to be given to the client shall advise the prompt substitution of another attorney or attorneys in place of the formerly admitted attorney. In the event the client does not obtain substitute counsel before the effective date of the disbarment, suspension, administrative suspension or transfer to status, it shall be

the responsibility of the formerly admitted attorney to move in the court or agency in which the proceeding is pending for leave to withdraw. The notice to be given to the attorney or attorneys for an adverse party shall state the place of residence of the client of the formerly admitted attorney.

(c) Rule of Disciplinary Enforcement 217 (e)(1) - Within ten days after the effective date of the disbarment, suspension, administrative suspension or transfer to inactive status order, the formerly admitted attorney shall file with the Board a verified statement showing that the provisions of the order and these rules have been fully complied with.

(d) Rule of Disciplinary Enforcement 217(j)(1) -A formerly admitted attorney may not engage in any form of law-related activities in this Commonwealth except in accordance with the following requirements: All law-related activities of the formerly admitted attorney shall be conducted under the supervision of a member in good standing of the Bar of this Commonwealth who shall be responsible for ensuring that the formerly admitted attorney complies with the requirements of this subdivision (j). If the formerly admitted attorney is engaged by a law firm or other organization providing legal services, whether by employment or other relationship, an attorney of

the firm or organization shall be designated by the firm or organization as the supervising attorney for purposes of this subdivision.

(e) Rule of Disciplinary Enforcement 217(j)(2)(i) - A formerly admitted attorney may not engage in any form of law-related activities in this Commonwealth except in accordance with the following requirements: For purposes of this subdivision (j), the only law-related activities that may be conducted by a formerly admitted attorney are the following: legal work of a preparatory nature, such as legal research, assembly of data and other necessary information, and drafting of transactional documents, pleadings, briefs, and other similar documents.

(f) Rule of Disciplinary Enforcement 217(j)(4)(iii) - A formerly admitted attorney may not engage in any form of law-related activities in this Commonwealth except in accordance with the following requirements: Without limiting the other restrictions in this subdivision (j), a formerly admitted attorney is specifically prohibited from engaging in any of the following activities: performing any law-related services for any client who in the past was represented by the formerly admitted attorney.

(g) Rule of Disciplinary Enforcement 217(j)(4)(iv) - A formerly admitted attorney may not engage in any form of law-related activities in this Commonwealth except in accordance with the following requirements: Without limiting the other restrictions in this subdivision (j), a formerly admitted attorney is specifically prohibited from engaging in any of the following activities: representing himself or herself as a lawyer or person of similar status.

SPECIFIC JOINT RECOMMENDATION FOR DISCIPLINE

34. Petitioner and Respondent jointly recommend that the appropriate discipline for Respondent's admitted misconduct in this matter is a two-year suspension, stayed in its entirety, and that Respondent be placed on probation for that period of time with the condition of the probation being her compliance with all Continuing Legal Education requirements, pursuant to Section 89.291, Disciplinary Board Rules. Attached to the Petition is Respondent's executed Affidavit required by Rule 215(d)(1) through (4), Pa.R.D.E.

35. Respondent received an Informal Admonition On May 19, 2010 for practicing while on inactive status.

36. In support of Petitioner and Respondent's joint recommendation, it is respectfully submitted that the proposed discipline is within the range of discipline found in similar cases:

(a) There are many cases concerning lawyers who have been disciplined for the unauthorized practice of law. It has not been uncommon for attorneys to receive six-month suspensions for having engaged in "limited acts" of unauthorized practice of law. In *Office of Disciplinary Counsel v. John V. Buffington*, No. 45 DB 2004, No. 1050 Disciplinary Docket No. 3, (September 2006), the Supreme Court suspended the attorney from the practice of law for a period of six months for his unauthorized practice of law in three legal matters. Mr. Buffington admitted his misconduct and took immediate corrective action.

(b) Similarly, in a more recent discipline on consent case, in *Office of Disciplinary Counsel v. Calvin Taylor, Jr.*, No. 253 DB 2010, No. 1702 Disciplinary Docket No. 3, (April 2011), the Supreme Court suspended Mr. Taylor for engaging in acts of the unauthorized practice of law for a one-month period. Mr. Taylor expressed remorse and took steps to resume active status.

(c) In *Office of Disciplinary Counsel v. James Edward Harvin*, No. 108 DB 2008, No. 1591 Disciplinary Docket No. 3 (June 2010), the Supreme Court suspended Mr. Harvin for a period of one year and one day for his continued representation of a client in a civil matter until his representation was withdrawn by motion of opposing counsel.

37. The aggravating factor herein is that Respondent received an Information Admonition on May 19, 2010 for violating Rule of Professional Conduct 5.5(a), and Rules 217(j)(1), 217(j)(4)(iii) and 217(j)(4)(iv), Pennsylvania Rules of Disciplinary Enforcement, for the same type of conduct – the unauthorized practice law while being on inactive status. That matter also involved a relatively short time frame and Respondent took remedial steps immediately to be reinstated after being contacted by Office of Disciplinary Counsel.

38. The mitigating factors herein are:

(a) Respondent has admitted her misconduct;

(b) Respondent has participated in and cooperated with Disciplinary Counsel in the prosecution of the within matter;

(c) Respondent, through the filing of this Joint Petition, expresses great regret and accepts responsibility for her actions;

(d) The affirmative acts of the unauthorized practice of law engaged in by Respondent were for only a short period of time running from December 22, 2011 to January 11, 2012;

(e) Respondent engaged in only "limited acts" of unauthorized practice;

(f) Respondent took immediate steps to remedy the situation when confronted by Office of Disciplinary Counsel; and,

(g) Respondent performs public service at times by handling *pro bono* cases.

39. Respondent is a single mother and sole provider for her seven year old son who suffers from respiratory disease and is often in need of medical treatment.

40. For all of the reasons set forth above, Petitioner and Respondent believe that a two-year suspension, stayed in its entirety, and probation for that period of time with the condition of the probation being that Respondent fully comply with all Continuing Legal Education requirements prior to the due date for her Compliance Group 1, which is April 30 of each year, pursuant to Section 89.291, Disciplinary Board Rules, is appropriate considering all of the facts and circumstances herein.

WHEREFORE, Petitioner and Respondent respectfully request that pursuant to Rules 215(d) and 215(g)(1), Pa.R.D.E., the Three Member Panel of the Disciplinary Board reviews and approves this Joint Petition in Support of Discipline on Consent under Rule 215(d), Pa.R.D.E. and files its recommendation with the

Supreme Court of Pennsylvania in which it is recommended that the Supreme Court enter an Order imposing upon Respondent a stayed two-year suspension.

Respectfully submitted,

OFFICE OF DISCIPLINARY COUNSEL

PAUL J. KILLION
CHIEF DISCIPLINARY COUNSEL

By *Susan N. Dobbins*
Susan N. Dobbins
Disciplinary Counsel

and

By *JLJ*
Jennifer Lynch Jackson
Respondent

BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, :
: Petitioner : No. 107 DB 2012
: v. :
: JENNIFER LYNCH JACKSON, : Attorney Registration No. 92274
: Respondent : (Allegheny County)

VERIFICATION

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

9/21/12
Date

Susan N. Dobbins
Susan N. Dobbins
Disciplinary Counsel

9-21-12
Date

Jennifer Lynch Jackson
Jennifer Lynch Jackson
Respondent

BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, :
: Petitioner : No. 107 DB 2012
: v. :
: JENNIFER LYNCH JACKSON, : Attorney Registration No. 92274
: Respondent : (Allegheny County)

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

Respondent, Jennifer Lynch Jackson, hereby states that she consents to the imposition of a **two-year suspension, stayed in its entirety, and that she be placed on probation for that period of time with a condition of the probation being that Respondent fully comply with all Continuing Legal Education requirements prior to the due date for her Compliance Group 1, which is April 30th of each year, pursuant to §89.291, Disciplinary Board Rules**, jointly recommended by Petitioner, Office of Disciplinary Counsel, and Respondent in the Joint Petition In Support Of Discipline On Consent and further states that:

1. Her consent is freely and voluntarily rendered; she is not being subjected to coercion or duress; she is fully aware of the implications of submitting the consent; and, she has not consulted with counsel in connection with the decision to consent to discipline;

2. She is aware that there is presently pending an investigation into allegations that she has been guilty of misconduct as set forth in the Joint Petition;

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

4. She consents because she knows that if charges predicated upon the matter under investigation continued to be prosecuted in the pending proceeding, she could not successfully defend against them.


Jennifer Lynch Jackson
Respondent

Sworn to and subscribed
before me this 21st
day of September, 2012.


Notary Public

