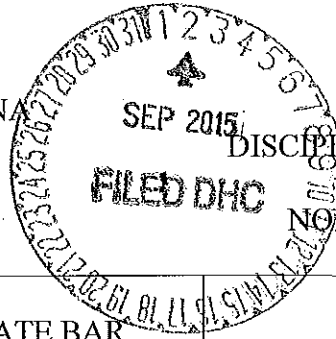


STATE OF NORTH CAROLINA

WAKE COUNTY



BEFORE THE
 DISCIPLINARY HEARING COMMISSION
 OF THE
 NORTH CAROLINA STATE BAR
 15 DHC 17

THE NORTH CAROLINA STATE BAR,

Plaintiff

v.

STEVE L. COMBS, Attorney,

Defendant

CONSENT ORDER OF DISCIPLINE

THIS MATTER was considered by a hearing panel of the Disciplinary Hearing Commission composed of Shirley Fulton, Chair, Renny Deese, and Bradley Lail. Plaintiff, the North Carolina State Bar, was represented by Brian P.D. Oten. Defendant, Steve L. Combs, represented himself. Defendant waives a formal hearing in this matter. The parties stipulate and agree to the findings of fact and conclusions of law recited in this order, and consent to the discipline imposed by this order. By consenting to the entry of this order, Defendant knowingly, freely, and voluntarily waives his right to appeal this consent order or to challenge in any way the sufficiency of the findings and conclusions herein.

Based on the foregoing and with the consent of the parties, the Hearing Panel hereby makes by clear, cogent and convincing evidence the following:

FINDINGS OF FACT

1. Plaintiff, the North Carolina State Bar ("Plaintiff" or "State Bar"), is a body duly organized under the laws of North Carolina and is the proper party to bring this proceeding under the authority granted it in Chapter 84 of the General Statutes of North Carolina, and the rules and regulations of the North Carolina State Bar promulgated thereunder.
2. Defendant, Steve L. Combs ("Defendant" or "Combs"), was admitted to the North Carolina State Bar on 25 August 2005 and is, and was at all times referred to herein, an attorney at law licensed to practice in North Carolina, subject to the rules, regulations and Rules of Professional Conduct of the North Carolina State Bar and the laws of the State of North Carolina.
3. During the relevant periods referred to herein, Combs was actively engaged in the private practice of law in the city of Cary, Wake County, North Carolina.
4. Combs was properly served with the summons and complaint in this matter.

5. During 2011-2012, Combs maintained an attorney trust account at Crescent State Bank, account number ending in 4046, to which he had exclusive access.
6. During 2011-2012, Combs maintained an operating account for his law practice at Crescent State Bank, account number ending in 0398, to which he had exclusive access.
7. In April 2011, Combs was the closing attorney for a residential real estate closing involving client Duan.
8. At closing, Combs received \$169.60 for the benefit of Duan as payment for the title insurance premium for Duan's title insurance policy. Combs deposited these funds into his trust account.
9. Combs failed to disburse the title insurance premium collected at closing and failed to submit the final title opinion to obtain the title insurance policy for Duan.
10. Combs did not inform Duan that he failed to disburse the title insurance premium and failed to submit the final title opinion.
11. Combs never disbursed the title insurance premium collected at closing and never submitted the final title opinion to obtain the title insurance policy for Duan.
12. During the time Combs retained Duan's \$169.60 title insurance premium payment in his trust account, Combs's trust account should have maintained a balance of at least \$169.60.
13. In August 2011, Combs overdrawed his trust account.
14. Combs disbursed Duan's \$169.60 to himself or a third party for Combs's personal benefit or the benefit of someone other than Duan.
15. Combs was not entitled to the \$169.60.
16. Combs did not have Duan's authorization to disburse those funds to anyone other than the title insurance company.
17. Upon realization of the deficiency, Combs deposited sufficient funds for the Duan account.
18. Between 2008 and 2012, Combs was the closing attorney in various residential real estate closings. In these closings he represented the buyer and the lender.
19. As closing attorney, Combs received and deposited into his trust account entrusted client funds, a portion of which he was instructed to disburse as payment for title insurance premiums.
20. In several of these closings, including but not limited to those involving clients Eason, Hawks, Cascino, Massengill, Seed, Stutesman, Talley, Webb, Dominado, and

Vonlehmden, Combs did not timely disburse the title insurance premiums as instructed by his clients.

21. In several of these closings, including but not limited to those involving clients Brojawkoski, Griffeth, Robinson, Granados, Borek, Shirley, Berger, Motley, Sparks, Stoehr, Cordones, Spagnola, and Perrymore, Combs never disbursed the title insurance premiums received at closing and never submitted the final title opinions to obtain the title insurance policies for his clients as instructed by his clients.

22. In the cases in which Combs never disbursed the title insurance premiums as instructed by his clients, Combs should have retained the funds to pay for the title insurance premiums in his trust account until disbursement.

23. In August 2011, Combs overdrawed his trust account. As of October 2012, Combs's trust account contained \$170.76.

24. Combs failed to preserve the title insurance premiums received at closing for clients Brojawkoski, Griffeth, Robinson, Granados, Borek, Shirley, Berger, Motley, Sparks, Stoehr, Cordones, Spagnola, and Perrymore.

25. Combs disbursed to himself or to a third party for Combs's personal benefit or the benefit of someone other than his clients all or a portion of the title insurance premiums received at closing for clients Brojawkoski, Griffeth, Robinson, Granados, Borek, Shirley, Berger, Motley, Sparks, Stoehr, Cordones, Spagnola, and Perrymore.

26. Combs was not entitled to the title insurance premium funds.

27. Combs did not have his clients' authorization to disburse the title insurance premium funds to anyone other than the applicable title insurance company.

28. In November 2013, a title insurance company notified Combs of title issues that needed to be resolved in at least 10 closings in order for the title insurance company to issue title policies. Combs failed to timely address these issues, and title policies have yet to be issued for these clients.

29. During at least 2011-2012, Combs disbursed more funds for some clients than he had in the trust account for those clients. Combs misused other entrusted funds in his trust account to fund such over-disbursements.

30. During at least 2011-2012, Combs failed to perform all quarterly or monthly reconciliations of accounts into which he deposited entrusted client funds as required by the Rules of Professional Conduct.

31. During at least 2011-2012, Combs failed to maintain proper client ledgers which accurately tracked the deposit and withdrawal of all clients' funds entrusted to him.

32. During at least 2011-2012, Combs failed to identify the clients associated with all deposits of funds into his trust account and failed to identify the clients associated with all disbursements of funds from his trust account.

33. In or around January 2012, Stephanie Mason retained Combs for representation in registering her business in North Carolina.

34. Mason paid Combs \$300.00 for the representation.

35. Mason's payment to Combs consisted of Combs's fee as well as the anticipated \$125.00 filing fee for Mason's business documentation.

36. The \$125.00 provided by Mason to Combs for the anticipated filing fee were entrusted funds.

37. Combs did not deposit the \$125.00 Mason delivered to him in trust into his trust account.

38. Combs deposited the entire \$300.00 delivered to him by Mason into his operating account.

39. Combs did not retain the \$125.00 filing fee in trust for Mason.

40. Combs completed Mason's paperwork and attempted to file Mason's business registration in or around February 2012. The business registration was issued by the Secretary of State on or around March 2012.

41. Combs's payment of Mason's filing fee from his operating account was returned for insufficient funds. Combs issued replacement payment for the funds.

42. Combs disbursed Mason's \$125.00 to himself or a third party for Combs's personal benefit or the benefit of someone other than Mason.

43. Combs was not entitled to the \$125.00 he disbursed to himself or to a third party for his personal benefit or for the benefit of someone other than Mason, and Combs did not have Mason's authorization to disburse those funds to himself or to a third party.

Based on the foregoing Findings of Fact and with the consent of the parties, the Hearing Panel makes the following:

CONCLUSIONS OF LAW

1. All parties are properly before the Hearing Panel and the DHC has jurisdiction over Defendant, Steve L. Combs, and over the subject matter of this proceeding.

2. Defendant's conduct, as set out in the Findings of Fact above, constitutes grounds for discipline pursuant to N.C. Gen. Stat. § 84-28(b)(2) in that Defendant violated the Rules of Professional Conduct as follows:

- (a) By failing to timely complete the final title opinion and disburse the title insurance premium to obtain the title policy for Duan, Combs failed to act with reasonable diligence and promptness in representing a client in violation of Rule 1.3 and failed to promptly disburse client funds in violation of Rule 1.15-2(m);
- (b) By failing to inform Duan of his failure to complete the final title opinion and disburse the title insurance premium to obtain the title policy for Duan, Combs failed to keep his client reasonably informed about the status of the matter in violation of Rule 1.4(a)(3);
- (c) By failing to preserve the title insurance premium entrusted to him and deposited in his trust account and by disbursing his client's entrusted funds to himself or to a third party for his personal benefit or for the benefit of someone other than the beneficial owner of the funds, Combs failed to properly maintain and disburse entrusted funds in violation of Rules 1.15-2(a), (j), and (m);
- (d) By failing to timely complete final title opinions, by failing to timely disburse title insurance premiums, by failing to disburse title insurance premiums to obtain title policies for owners and/or lenders, and by failing to address title issues raised by the title insurance company, Combs failed to act with reasonable diligence and promptness in representing a client in violation of Rule 1.3 and failed to promptly disburse client funds in violation of Rule 1.15-2(m);
- (e) By failing to preserve the title insurance premiums entrusted to him and deposited in his trust account and by disbursing his clients' entrusted funds to himself or to a third party for his personal benefit or for the benefit of someone other than the beneficial owner of the funds, Combs failed to properly maintain and disburse entrusted funds in violation of Rules 1.15-2(a), (j), and (m);
- (f) By disbursing more funds for clients than he had in his trust account for such clients, thereby misusing entrusted funds he held in his trust account for the benefit of other clients, Combs failed to properly maintain and disburse entrusted funds in violation of Rules 1.15-2(a), (j), and (m);
- (g) By failing to maintain proper client ledgers, by failing to perform monthly and quarterly reconciliations of the accounts into which he deposited entrusted client funds, and by failing to identify the clients associated with all deposits of funds into his trust account and associated with all disbursements from his trust account, Combs failed to properly handle and disburse entrusted funds in violation of Rule 1.15-2(a) and failed to adequately monitor and maintain his attorney trust account in violation of Rules 1.15-3(b)(1), 1.15-3(b)(2), 1.15-3(b)(5), 1.15-3(d)(1), and 1.15-3(d)(2);

- (h) By failing to deposit Mason's entrusted client funds in his trust account and instead depositing Mason's entrusted funds in his operating account, Combs failed to deposit mixed funds in his trust account in violation of Rule 1.15-2(g) and failed to preserve entrusted funds provided to him in violation of Rules 1.15-2(a) and (b); and
- (i) By depositing \$125.00 of entrusted client funds into his operating account and disbursing those funds for personal or office expenses without authorization from the legal or beneficial owner of the funds, Combs failed to preserve entrusted funds provided to him in violation of Rules 1.15-2(a) and (b), and used entrusted funds for his personal benefit or the benefit of a person other than the legal or beneficial owner of the funds in violation of Rule 1.15-2(j).

Based upon the consent of the parties, the Hearing Panel also finds by clear, cogent, and convincing evidence the following

ADDITIONAL FINDINGS REGARDING DISCIPLINE

1. Defendant has substantial experience in the practice of law.
2. There is no evidence that Defendant intended to harm his clients and there is no evidence of any dishonest or selfish motive on the part of Defendant.
3. Defendant's conduct in over-disbursing entrusted funds from his trust account caused significant harm to his clients whose entrusted funds were used for the benefit of someone other than the beneficial owner of the funds without their knowledge or consent. Defendant's conduct also impaired his clients' abilities to achieve the goals of their respective representations by delaying the conclusion of their real estate transactions and compromising their financial ability to do so.
4. Conducting quarterly reconciliations of the trust account is the lynchpin of proper maintenance and protection of entrusted funds. Had Defendant been conducting quarterly reconciliations, he would have seen balances remaining for various clients which would have signaled that work, such as obtaining the title policy, still needed to be done in the file. Additionally, had Defendant been conducting quarterly reconciliations, he would have also had to identify the funds in his trust account and would have maintained awareness of whose funds were in his trust account and the appropriate disbursement of those funds. Defendant's continued failure to reconcile his trust account and failure to maintain proper trust account records demonstrates a pattern of misconduct and demonstrates Defendant's intent to commit acts where the potential harm is foreseeable.
5. The lenders in the residential real estate transactions closed by Defendant were vulnerable clients in that it was solely through Defendant that the title insurance premium from the loan proceeds held by Defendant in his trust account could be disbursed to the title insurance company and the title policy obtained.
6. The title insurance companies are third parties affected by Defendant's failure to timely disburse title insurance premiums and complete final title opinions. Defendant's failure to

pay the premium and provide the necessary final title opinion impedes the title insurance companies' abilities to issue title policies.

7. Defendant's conduct – allowing client funds to be improperly maintained or disbursed, even if inadvertent – places entrusted funds at risk and has the potential to cause significant harm to the standing of the profession in the eyes of the public because it shows his disregard for his duties as an attorney. Such erosion of public confidence in attorneys tends to sully the reputation of, and fosters disrespect for, the profession as a whole. Confidence in the legal profession is a building block for public trust in the entire legal system.

8. Defendant has no prior disciplinary offenses.

9. The Hearing Panel has carefully considered all of the different forms of discipline available to it, including admonition, reprimand, censure, suspension, and disbarment, in considering the appropriate discipline to impose in this case.

Based upon the Findings of Fact, Conclusions of Law, and Additional Findings Regarding Discipline, and with the consent of the parties, the Hearing Panel makes the following:

CONCLUSIONS REGARDING DISCIPLINE

1. The Hearing Panel has carefully considered all of the different forms of discipline available to it.

2. The Hearing Panel considered all of the factors enumerated in 27 N.C. Admin. Code 1B § .0114(w) of the Discipline and Disciplinary Rules of the North Carolina State Bar.

3. The Hearing Panel concludes that the following factors from § .0114(w)(1), which are to be considered in imposing suspension or disbarment, are present in this case:

- (a) intent of the defendant to commit acts where the harm or potential harm is foreseeable;
- (b) Defendant's actions had a potential negative impact on his clients' and the public's perception of the legal profession;
- (c) impairment of the client's ability to achieve the goals of the representation; and
- (d) effect of Defendant's conduct on third parties.

4. The Hearing Panel has considered all of the factors enumerated in § .0114(w)(2) of the Rules and Regulations of the North Carolina State Bar and concludes no factors are present in this instance that would warrant disbarment.

5. The Hearing Panel concludes that the following factors from § .0114(w)(3), which are to be considered in all cases, are present in this case:

- (a) absence of prior disciplinary offenses;
- (b) absence of a dishonest or selfish motive;
- (c) a pattern of misconduct;
- (d) multiple offenses;
- (e) vulnerability of Defendant's clients; and
- (f) Defendant's substantial experience in the practice of law.

6. Defendant's conduct caused significant harm to his buyer and lender clients, whose funds were not properly maintained and disbursed and who did not receive the desired product of the intended disbursements (e.g. title policies).

7. Defendant's conduct caused potential significant harm to both his clients and to the title insurance companies. The absence of title policies could have been, or could be in the future, significantly harmful to the client and the title insurance company if a title issue arose or arises before being remedied.

8. Defendant's conduct, if continued or tolerated by the Bar, poses significant potential harm to future clients.

9. The Hearing Panel has considered admonition, reprimand, and censure as potential discipline but finds that admonition, reprimand, or censure would not be sufficient discipline because of the gravity of the harm to clients and the significant threat of potential harm to the public.

10. The Panel finds that any sanction less than suspension would fail to acknowledge the seriousness of the offenses committed by Defendant, would not adequately protect the public, and would send the wrong message to attorneys and the public regarding the conduct expected of members of the Bar in this State.

11. Due to Defendant's numerous violations of the Rules of Professional Conduct, the public can only be adequately protected by a period of active suspension of Defendant's law license. Defendant should be allowed the opportunity to apply for a stay of a portion of the suspension imposed by this Order upon compliance with certain conditions designed to ensure protection of the public and to ensure Defendant's compliance with the Rules of Professional Conduct.

Based upon the foregoing Findings of Fact, Conclusions of Law, and Findings and Conclusions Regarding Discipline, and with the consent of the parties, the Hearing Panel enters the following

ORDER OF DISCIPLINE

1. The license of Defendant, Steve L. Combs, is hereby suspended for three years, effective 60 days from the date of service of this order upon Defendant.

2. Defendant shall submit his license and membership card to the Secretary of the North Carolina State Bar no later than 30 days following the effective date of this Order.

3. Defendant shall comply with the wind down provisions contained in Rule .0124 of the North Carolina State Bar Discipline and Disability Rules, 27 N.C. Admin. Code 1B § .0124. As provided in § .0124(d), Defendant shall file an affidavit with the Secretary of the North Carolina State Bar within 10 days of the effective date of this order, certifying he has complied with the wind down rule.

4. Defendant is taxed with the administrative fees and the costs of this action as assessed by the Secretary. Defendant shall pay the costs and administrative fees of this action as assessed by the Secretary within 30 days of service of the statement of costs upon him.

5. Within 30 days of the effective date of this Order, Defendant shall provide the State Bar with an address and telephone number at which clients seeking return of files can communicate with Defendant and obtain such files, and Defendant shall promptly return all files to his clients upon request.

6. After serving no less than one year of the suspension, Defendant may apply for a stay of the remaining period of suspension imposed by this Order by filing a verified petition with the Secretary of the North Carolina State Bar. In addition to complying with the general provisions for reinstatement listed in Rule .0125 of the North Carolina State Bar Discipline & Disability Rules, to be eligible for a stay of the remaining period of suspension, Defendant must demonstrate compliance with the following conditions by clear, cogent, and convincing evidence:

- (a) Defendant shall timely comply with paragraphs 2-5 of this section of the Order of Discipline;
- (b) Defendant shall complete eight hours of trust account continuing legal education programs, approved in advance by the Office of Counsel, including at least one that includes discussion of quarterly reconciliations of the trust account taught by Peter Bolac, Trust Account Compliance Counsel for the North Carolina State Bar;
- (c) Prior to the effective date of this Order, Defendant shall: i) promptly contact and respond to all inquiries from title companies, lenders, and clients regarding the status of any outstanding title policies, ii) timely complete and send all outstanding final title opinions, and iii) pay all outstanding title premiums for his clients, including but not limited to the clients identified in this Order. Defendant shall provide copies of all submitted final title opinions and copies of all checks reflecting paid title premiums to the Office of Counsel no later than 15 days after the effective date of this Order;

- (d) Within 30 days of this Order's effective date, Defendant shall retain a CPA, approved in advance by the Office of Counsel, to reconcile Defendant's trust account(s) and identify all clients whose funds are deposited in the account(s) or are missing from the account(s). Any costs associated with retaining a CPA for purposes of this Order shall be at Defendant's sole expense. Upon reconciling Defendant's trust account(s), Defendant shall provide the Office of Counsel with a reconciliation report from the CPA identifying every client whose funds are deposited in Defendant's trust account(s) and identifying any shortage in the account(s);
- (e) Defendant is presently enjoined from handling entrusted funds by the Wake County Superior Court (case no. 12 CVS 14586). Within 90 days of completing the reconciliation of Defendant's trust account(s) as noted in the preceding paragraph, and after obtaining the approval of the Office of Counsel, Defendant shall petition the Wake County Superior Court seeking permission to reimburse to his trust account for all funds identified by the reconciliation as missing or unaccounted for from his trust account(s) and to disburse all client funds to the beneficial owner(s) of the funds pursuant to the order of the Court. Defendant shall then make such disbursements as ordered by the Court, including escheating all unidentified funds in accordance with Rule 1.15-2(q). Upon disbursing all funds from his trust account(s), Defendant shall close all trust accounts used in or by his practice prior to the date of this Order. Defendant shall comply with any subsequent order of the Court;
- (f) Defendant shall retain a CPA, approved in advance by the Office of Counsel, who is willing and able to render the services required by paragraph 7(c) below. Any costs associated with retaining a CPA for purposes of this Order shall be at Defendant's sole expense;
- (g) Defendant has kept the North Carolina State Bar membership department advised of his current physical home and business addresses and telephone numbers;
- (h) Defendant has accepted all certified mail from the North Carolina State Bar and responded to all letters of notice and requests for information from the North Carolina State Bar by the deadlines stated in the communication or within fifteen days of receipt of such communication, whichever is earlier;
- (i) Defendant has timely complied with his State Bar membership and continuing legal education requirements, and paid all fees and costs assessed by the State Bar and the Client Security Fund by the applicable deadline;
- (j) Defendant has participated fully and timely in the State Bar's fee dispute resolution program when notified of any petitions for resolution of disputed fees; and
- (k) Defendant has not violated the Rules of Professional Conduct or any state or federal laws other than minor traffic violations during the period of suspension.

7. If Defendant successfully seeks a stay of the suspension of his law license pursuant to this Order, the stay will continue in force only as long as Defendant complies with the following conditions:

- (a) Each month that Defendant operates a trust or fiduciary account in connection with his law practice, Defendant shall provide the Office of Counsel of the State Bar with an accurate three-way reconciliation described in the State Bar Lawyer's Trust Account Handbook for all trust accounts maintained by him. Defendant shall use the form prepared by the State Bar's Trust Account Compliance Counsel, which will be provided to him by the Office of Counsel, for this purpose. Defendant shall provide the three-way reconciliation report, accurate client ledgers for all clients with funds in the trust account(s) during that month, ledger for any personal funds maintained in the trust account(s) for bank or credit card fees, his trust account ledger, and the bank statements, cancelled checks, deposit slips, and any other document or instruction (such as wire or electronic transfer activity) regarding the deposit or disbursement of funds into/from his trust account for each month. These documents are due on the 15th day of the following month – for example, the three-way reconciliation for the month of January is due on February 15;
- (b) Each month that Defendant operates a trust or fiduciary account in connection with his law practice, Defendant shall provide the Office of Counsel of the State Bar with a list of clients for whom Defendant collected funds for title insurance premiums but for whom Defendant has not submitted the final title opinion and premium to the title insurance company. The list shall contain the name of the client, the date of the closing, the reason why the final title opinion and premium has not been submitted, and an estimated date for completion. This list is due on the same day each month as the three-way quarterly reconciliation required in the above paragraph;
- (c) Each quarter that Defendant operates a trust or fiduciary account in connection with his law practice, Defendant shall have a CPA audit his trust accounts. Defendant will be responsible for any associated costs. This audit shall assess whether Defendant has in his trust account the client funds he should be maintaining for his clients at that time, as well as Defendant's compliance with Rule 1.15-2 and Rule 1.15-3. The CPA's audit shall include addressing the items on the form which will be provided by the State Bar to Defendant. The quarterly audit reports from the CPA are due no later than 30 days after the end of the quarter – for example, the CPA audit for the first quarter of the calendar year (January, February, and March) is due on April 30;
- (d) If either the monthly three-way reconciliation report or the CPA audit reveals any deviation from Defendant's obligations under Rule 1.15-2 or Rule 1.15-3, Defendant shall take remedial action within 10 days of the date of the three-way reconciliation report or the CPA audit and shall provide documentation showing

the remedial action to the State Bar within 2 days of the date of the remedial action;

- (e) Defendant shall comply with any requests from the Office of Counsel to provide any information regarding his trust accounts or to sign and provide any release or authorization to allow the Office of Counsel to obtain information directly from any bank in which Defendant maintains a trust account, by the deadline stated in the request;
- (f) Defendant shall keep the North Carolina State Bar membership department advised of his current physical home and business addresses and telephone numbers;
- (g) Defendant shall accept all certified mail from the North Carolina State Bar and respond to all letters of notice and requests for information from the North Carolina State Bar by the deadlines stated in the communication or within fifteen days of receipt of such communication, whichever is earlier;
- (h) Defendant shall timely comply with his State Bar membership and continuing legal education requirements, and pay all fees and costs assessed by the State Bar and the Client Security Fund by the applicable deadline;
- (i) Defendant shall participate fully and timely in the State Bar's fee dispute resolution program when notified of any petitions for resolution of disputed fees; and
- (j) Defendant shall not violate the Rules of Professional Conduct or any state or federal laws other than minor traffic violations.

8. If Defendant fails to comply with any one or more of the conditions stated in Paragraph 7 above, then the stay of the suspension of his law license may be lifted as provided in 27 N.C. Admin. Code 1B § .0114(x) of the North Carolina State Bar Discipline and Disability Rules.

9. If Defendant does not seek a stay of any active period of suspension, or if some part of the suspension is stayed and thereafter the stay is revoked, Defendant must provide in his application for reinstatement clear, cogent, and convincing evidence of the following:

- (a) Compliance with the general provisions for reinstatement listed in 27 N.C. Admin. Code 1B § .0125 of the North Carolina State Bar Discipline & Disability Rules; and
- (b) Compliance with the conditions set out in paragraph 6, above.

10. Nothing in this Order shall prohibit the State Bar from investigating and, if necessary, pursuing disciplinary action against Defendant for additional misconduct discovered or reported which occurred during the same time period as the conduct addressed in this Order.

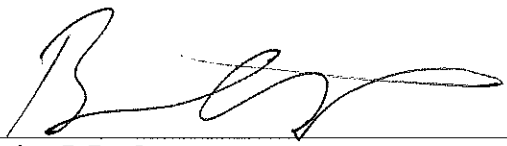
11. The Disciplinary Hearing Commission will retain jurisdiction of this matter pursuant to 27 N.C. Admin. Code 1B § .0114(x) of the North Carolina State Bar Discipline and Disability Rules throughout the suspension, and any stay thereof, and until all of the conditions referenced in paragraph 6 above are satisfied.

Signed by the Chair with the consent of the other hearing panel members, this the 27th day of August, 2015.

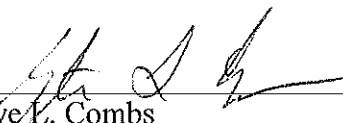


Shirley Fulton, Chair
Disciplinary Hearing Panel

CONSENTED TO BY:



Brian P.D. Oten
Deputy Counsel
North Carolina State Bar
Counsel for Plaintiff



Steve L. Combs
Defendant