

**BEFORE THE BOARD OF COMMISSIONERS ON THE  
UNAUTHORIZED PRACTICE OF LAW OF  
THE SUPREME COURT OF OHIO**

**DISCIPLINARY COUNSEL**  
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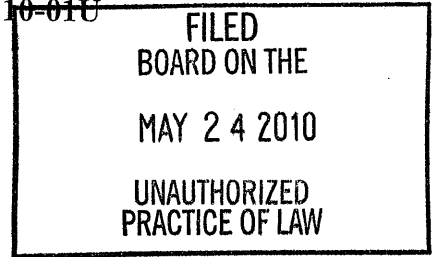
**RELATOR,**

v.

**Karen Dawn Bolton**  
139 South Shore Drive  
Chillicothe, OH 45601

**RESPONDENT.**

BOARD NO. 10-01U



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**SETTLEMENT AGREEMENT OF RELATOR AND RESPONDENT PURSUANT TO  
RULE VII SECTION 5b OF THE RULES FOR THE GOVERNMENT OF THE BAR OF  
OHIO**

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Relator filed a Formal Complaint against respondent, Karen D. Bolton, with the Board of Commissioners on the Unauthorized Practice of Law of the Supreme Court of Ohio ("Board") on January 20, 2010. Respondent filed an Answer to the Complaint on February 22, 2010. Relator and respondent now enter into this Settlement Agreement pursuant to Gov. Bar R. VII § 5b.

**I. AGREED FACTS**

1. Respondent, Karen D. Bolton, is an attorney not admitted to the practice of law in the State of Ohio who is currently registered for corporate status as of June 3, 2009, in connection with her employment as Chief Legal Officer at Adena Health System ("Adena"), an Ohio non-profit corporation.

2. Bolton is a 1989 graduate of the John Marshall Law School in Chicago, Illinois. She also earned a Masters of Law degree from St. Louis University in St. Louis, Missouri. She is an attorney in good standing before the Michigan Supreme Court and an active member of the Michigan Bar. She is also an attorney in good standing before the Illinois and Missouri Supreme Courts, but is an inactive member of the Illinois and the Missouri Bars.

3. On June 16, 2008, Adena hired Bolton as the Corporate Compliance and Ethics Officer and she began residing in Ohio at that time. In this position, Bolton ensured that Adena complied with Medicare and Medicaid rules and regulations, which includes coding and billing. Bolton was not admitted to practice law in Ohio but this position did not require a law license.

4. In February 2009, Bolton was offered and accepted the position of Chief Legal Officer (CLO) for Adena, after Tom Prunte, former Chief Legal Officer resigned. It was proposed that in Bolton's position as CLO, she would be working with another in-house counsel, Natalie Di Ionno, who is an Ohio licensed attorney.

5. At that time, Bolton was not admitted to practice law in Ohio and she believed that an Ohio law license was necessary to be Adena's Chief Legal Officer.

6. Bolton immediately reviewed the Supreme Court of Ohio's website and found the application and instructions for admission without examination. The website did not indicate that an out-of-state attorney could be registered in Ohio under corporate status. However, Bolton did not contact the Supreme Court's Office of Attorney Services or review the Gov. Bar Rules to determine whether other means of out-of-state admission or registration existed at that time.

7. In March 2009, Bolton began to request and assemble the documents required for the admission without examination. Bolton obtained the various good standing certificates,

undergraduate and law school transcripts, affidavits from former employers as well as the thirty-three-page character and fitness application.

8. On June 1, 2009, after assembling all of the information needed for admission without examination, Bolton noticed that the paperwork referred to an “attorney registration requirement.” Bolton did not know what this meant but upon researching the noted Gov. Bar Rule, she discovered the process of corporate status registration.

9. Bolton immediately contacted the Office of Attorney Services and the Office of Bar Admissions and was directed to register for corporate status first, which she did on June 3, 2009.

10. On July 21, 2009, the Supreme Court of Ohio approved Bolton’s registration for corporate status with an effective date of June 3, 2009. Bolton’s Ohio attorney registration number is 0084792. By virtue of her corporate status, Bolton can now perform legal services in Ohio for Adena and can now appear on its behalf before an Ohio court or agency if that court of agency grants her leave to appear.

11. As a result, from February 2009 until June 3, 2009, Bolton was unauthorized to practice law in Ohio.

12. During this sixteen week period, Bolton engaged in the unauthorized practice of law by performing legal work on behalf of Adena.

13. During the same period, Bolton engaged in the unauthorized practice of law by representing to others that she was authorized to practice law in Ohio through verbal introductions as Adena’s Chief Legal Officer and several letters to Adena board members in which she identified herself as “Karen D. Bolton, Chief Legal Officer.”

14. On June 15, 2009, Bolton received notice of relator’s investigation of this matter.

15. After that, Bolton notified the Office of Bar Admissions that an unauthorized practice of law (UPL) investigation was pending.

## **II. AGREED RESOLUTION**

As set forth in Gov. Bar R. VII § 5b(C):

- Respondent admits that she was engaged in the unauthorized practice of law as set forth in the “Agreed Facts” section of this agreement, and thereby, admits the material allegations of the unauthorized practice of law as set forth in relator’s Formal Complaint;
- The public is protected from future harm and any substantial injury is remedied by this agreement;
- Respondent agrees to cease and desist from engaging in the unauthorized practice of law;
- This settlement agreement resolves the material allegations of the unauthorized practice of law;
- This settlement agreement does not involve any public policy issues or encroach upon the jurisdiction of the Supreme Court to regulate the practice of law; and,
- This settlement agreement furthers the stated purposes of Gov. Bar R. VII.

Also, the determination of whether this agreement shall not prohibit respondent from filing for and obtaining an Ohio license to practice law by virtue of Admission without Examination is reserved for the Office of Bar Admissions.

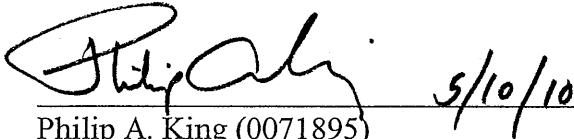
Respectfully submitted,



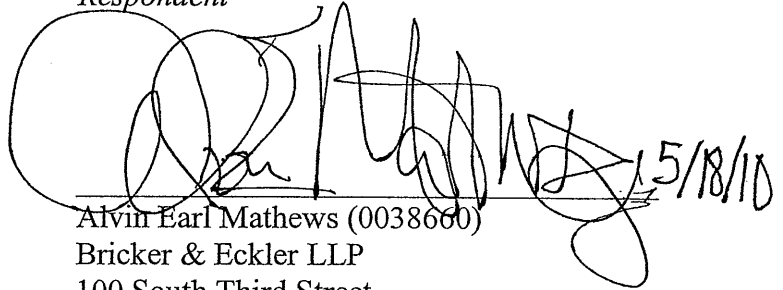
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