


# ANNUAL REPORT 2025



**The Office of Attorney Regulation Counsel**  
*Protecting the Public. Promoting Professionalism.*



"A license to practice law is a proclamation to the public ...

... that the holder thereof is one to whom a member of the public may, with confidence, entrust his professional matters, with the assurance that in the performance of legal services the lawyer will perform the basic legal tasks undertaken, competently, ethically, and in accordance with the highest standards of professional conduct."

— People ex rel. Goldberg v. Gordon, 607 P.2d 995, 998 (Colo. 1980)

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"I do solemnly swear (or affirm) that:

I will support the Constitution of the United States and the  
Constitution of the State of Colorado;

I will maintain the respect due to courts and judicial officers;

I will employ such means as are consistent with truth and honor;

I will treat all persons whom I encounter through my practice of law  
with fairness, courtesy, respect, and honesty;

I will use my knowledge of the law for the betterment of society and  
the improvement of the legal system;

I will never reject, from any consideration personal to myself, the  
cause of the defenseless or oppressed;

I will at all times faithfully and diligently adhere to the Colorado Rules  
of Professional Conduct.

— Oath of Admission, signed on April 4, 2019, by Chief Justice Nathan B. Coats

## WHO WE ARE: UNDERSTANDING COLORADO LAWYERS LICENSED LEGAL PARAPROFESSIONALS (LLPs)

The Office of Attorney Regulation Counsel (OARC) tracks a variety of trends in the legal profession in Colorado using both its registration data and voluntary, anonymous demographic survey offered as part of the annual registration process. This year's focus is on trends in the profession over the past decade.

### ***Registered Attorneys and LLPs***

There were 48,141 Colorado registered attorneys at the turn of 2026, a 20 percent increase over a 10-year period. That represents a 14 percent total growth in active registrations (currently 29,731). Inactive registrations – comprised primarily of those moving out-of-state, into other careers or retiring – grew by 31 percent.

A total of 14,220 attorneys or licensed legal paraprofessionals (“LLPs”) took their oaths of admission during that time, with LLPs being newly included as of 2024. Attorneys may be admitted through the Colorado bar exam process, transferring a Uniform Bar Exam from another jurisdiction, or on-motion from admission in another jurisdiction. LLPs can be admitted only through the LLP exam process.

### ***What Are They Doing?***

Within the types of practices, the ranks of in-house counsel grew the most over a 10-year period: 36 percent (3,663 active registrations this year). Government attorneys grew by 19 percent (5,147 actives this year), and private practice attorneys (together with LLPs) increased by 15 percent (18,411 actives this year).

As attorneys have become more mobile, some of this growth is not reflected in Colorado-based practice. The American Bar Association tracks state-by-state numbers, and reports 23,720 resident attorneys in Colorado. However, this may not count attorneys with an exclusively federal practice who reside in Colorado but are licensed through another state.

Within private practice, there has been a slow but noticeable shift away from solo practice. Sole practitioner registrations dropped 5.6 percent in the past 10 years. This Office revised its definition of small, medium and large firms in 2018, so using the past eight years to benchmark the totals, the trends are noteworthy:

- 4.2 percent reduction in solos (5,361 actives this year);
- 21.5 percent increase in attorneys practicing in a small (2-10 attorney) firm (5,063 actives this year);

- 33.9 percent increase in attorneys practicing in a medium (11-50 attorney) firm (3,253 actives this year);
- 12.1 percent increase in attorneys practicing in a large (51+ attorney) firm (4,734 actives this year).

Sole practitioners are still numerically the largest group of active registrations in Colorado. But the trend of attorneys leaving or never entering into solo practice has implications for the practice of law. The American Bar Association reported that, in 2000, 48 percent of all private practitioners were solos, and 22 percent of private practitioners were in 2-10 sized firms. While this Office does not currently have available Colorado-specific statistics going back to 2000, the contrast between the ABA's data with Colorado's 2026 data is notable: 29 percent of private practitioners in Colorado are solos, and 27 percent are in 2-10 sized firms.

Solo practices can be challenging given administrative burdens and overhead costs, but also can be more nimble in serving modest means clients. Solo practitioners also might be more likely than others to consider practicing in under-served areas where residents cannot afford the rates of larger firms, but legal services are desperately needed. Predictions vary about future practice sizes, but some commentators point to technological innovations as creating the potential for efficiencies that might re-incentivize attorneys to consider solo practice.

Another way to view the reach of attorneys in Colorado is to compare them numerically to the number of residents. The American Bar Association published a state-by-state analysis in 2024, finding that Colorado had 23,249 in-state lawyers with active registrations (all practice types), compared to 5,877,610 Colorado residents – 3.96 lawyers for every 1,000 Coloradans. Colorado ranked 11th in the country as to this lawyer-to-residents ratio. The same publication analyzed metropolitan area demand for lawyers – using a “location quotient” that measures demand compared to the nation as a whole – and Denver ranked ninth in the country in 2023.

However, other statistics suggest that the growth in attorney registrations in Colorado has not been felt outside metro areas. The concerns over “legal deserts” were discussed in our 2020 annual report, with a Law Week Colorado analysis finding that 23 Colorado counties had 10 or fewer attorneys. The downward slide in the number of solo practitioners is likely to exacerbate those issues.

### ***Update on LLPs***

LLPs are licensed for a limited scope practice of law in domestic relations. Their scope of practice is defined in C.R.C.P. 207.1. LLPs cannot practice law in other areas and cannot handle certain legal issues due to their complexity, and as a result, LLPs can charge less than attorneys. Many LLPs were paralegals for years, even decades, before

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becoming an LLP. Their focus on family law issues helps address a gap in legal services experienced state-wide, where many judicial districts report that at least one litigant in 70 percent or more of domestic relations cases has no legal representation.

The Colorado Supreme Court administered the oath of admission to the first group of LLPs in June 2024. After four LLP exam cycles and character and fitness reviews, 126 LLPs were admitted to the practice of law in Colorado.

At the end of the 2026 registration cycle, Colorado LLPs indicated the following practice settings:

- 26 solo practitioners
- 63 in small (2-10) sized attorney/LLP firms
- 22 in medium (11-50) sized attorney/LLP firms
- 4 in large (51+) sized attorney/LLP firms

LLPs can be found throughout the state, including:

- Denver metro area (77)
- Colorado Springs area (21)
- Fort Collins area (4)
- Grand Junction area (6)
- Rifle area (3)
- Delta (2)
- Greeley (2)
- Pueblo (2)
- Canon City (1)
- Durango (1)
- Frisco (1)
- Johnstown (1)
- Peyton (1)
- Salida (1)
- Severance (1)



## Expectations of a Lawyer's Responsibilities...

A lawyer, as a member of the legal profession, is a representative of clients, an officer of the legal system and a public citizen having special responsibility for the quality of justice;

A lawyer should be competent, prompt and diligent in all professional functions;

A lawyer should maintain communication with a client concerning the representation;

A lawyer should keep in confidence information relating to the representation of a client except when disclosure is required or permitted by the Colorado Rules of Professional Conduct or other law;

A lawyer's conduct should conform to the requirements of the law, both in professional services to clients and in the lawyer's business and personal affairs;

A lawyer should use the law's procedures only for legitimate purposes and not to harass or intimidate others;

A lawyer should demonstrate respect for the legal system and for those who serve it, including judges, other lawyers and public officials; and,

While it is a lawyer's duty, when necessary, to challenge the rectitude of official action, it is also the lawyer's duty to uphold the legal process.

— C.R.C.P. 208.1(3)

## JUSTICES OF THE COLORADO SUPREME COURT

Through the Colorado Constitution and the Court's rules, the Colorado Supreme Court has plenary authority over the practice of law in Colorado. That includes attorney and licensed legal paraprofessional admission, registration, continuing legal education, discipline, and related programs, as well as the unauthorized practice of law.



**Top from left:** Justice Carlos A. Samour, Jr., Justice Richard L. Gabriel, Justice Melissa Hart<sup>1</sup>, Justice Maria E. Berkenkotter

**Bottom from left:** Chief Justice Monica M. Márquez, Justice Brian D. Boatright, Justice William W. Hood, III

Not pictured: Justice Susan Blanco<sup>2</sup>

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<sup>1</sup> Retired 1/5/2026

<sup>2</sup> Appointed 2/17/2026

## SUPREME COURT ADVISORY COMMITTEE ON THE PRACTICE OF LAW (ADVISORY COMMITTEE)

The Supreme Court Advisory Committee on the Practice of Law (Advisory Committee) is a volunteer committee that assists the Court with administrative oversight of the entire regulation system. The Committee's responsibilities are to review the productivity, effectiveness and efficiency of the Court's regulation system including that of the Attorney Regulation Counsel, the Office of the Presiding Disciplinary Judge, the Colorado Lawyer Assistance Program (COLAP) and the Colorado Office of Attorney Professional Excellence (APEX).

David W. Stark, *Chair*

Steven K. Jacobson<sup>3</sup>, *Vice-Chair*

Angela R. Arkin

David Beller

Diana David Brown

Nancy L. Cohen

Cynthia F. Covell

The Honorable Adam J. Espinosa

Carolyn D. Love, Ph.D.

The Honorable Andrew P. McCallin

Henry R. Reeve

Jessica Schmidt<sup>4</sup>

Sunita Sharma

Brian Zall

Alison Zinn

Justice Maria E. Berkenkotter (Liaison)

Justice William W. Hood, III (Liaison)

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<sup>3</sup> Retired 3/6/2026

<sup>4</sup> Appointed 3/7/2026

## OFFICE OF ATTORNEY REGULATION COUNSEL

Attorney Regulation Counsel serves at the pleasure of the Colorado Supreme Court. The Office of Attorney Regulation Counsel (OARC) works with the Advisory Committee and six other permanent Supreme Court committees in regulating the practice of law in Colorado. Attorney Regulation Counsel oversees attorney admissions, licensed legal paraprofessional (LLP) admissions, registration, mandatory continuing legal and judicial education, diversion and discipline, inventory matters, regulation of unauthorized practice of law, and administrative support for the Client Protection Fund.



**From left:** April McMurrey, Deputy Regulation Counsel, Intake Division; Gregory Sapakoff, Deputy Regulation Counsel, Trial Division; Jessica Yates, Attorney Regulation Counsel; Dawn McKnight, Deputy Regulation Counsel, Attorney and LLP Admissions, Registration, and Continuing Legal and Judicial Education; and Margaret Funk, Chief Deputy Regulation Counsel.



## **Jessica E. Yates**

### *Attorney Regulation Counsel*

Jessica Yates is Attorney Regulation Counsel for the Colorado Supreme Court. Ms. Yates oversees attorney and LLP admissions, registration, mandatory continuing legal and judicial education, discipline and diversion, regulation against the unauthorized practice of law, and inventory counsel matters. She also actively partners with the Colorado Bar Association and other bar associations in Colorado for events, presentations and initiatives, serves on the Supreme Court's Standing Committee on the Rules of Professional Conduct, and actively participates in the National Organization of Bar Counsel and the ABA's Center for Professional Responsibility. She received a "Raising the Bar" award from the Colorado Women's Bar Association Foundation in 2021.

Prior to her appointment by the Colorado Supreme Court, Ms. Yates was in private practice as a partner at Snell & Wilmer LLP, focusing on appeals and litigation. She clerked for the Honorable David M. Ebel of the U.S. Court of Appeals for the Tenth Circuit. She earned her J.D. from the University of Virginia School of Law in 2006.

While in private practice, Ms. Yates was the Denver lead for her firm's ethics committee, and served as the firm's co-chair for its pro bono committee. In these capacities, she helped set and implement policies and procedures for compliance with the Rules of Professional Conduct, promoted the 50-hour pro bono goal within the firm, and encouraged associates to get involved in both pro bono work and community service. She was active in the Colorado Bar Association's appellate group, helping organize its annual appellate CLE for several years, and served on the CBA's amicus curiae committee. She also served on the Standing Committee on Pro Se Litigation for the U.S. District Court for the District of Colorado. She participated on the Criminal Justice Act appellate panel for the Tenth Circuit. Ms. Yates also has served on boards of directors for numerous non-profit and civic organizations, including The Colorado Health Foundation and the Access Fund.

Ms. Yates transitioned into law from a career in public policy and public administration, which focused on management, regulatory and funding issues for health and human services programs. She received her M.A. in Public Administration and Public Policy from the University of York, England, and her B.A. in Journalism and Mass Communication from the University of North Carolina-Chapel Hill. Outside of work, Ms. Yates enjoys trail running, yoga, and rock-climbing.

### **Executive Assistant**

Kim Pask

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## **Margaret B. Funk**

### *Chief Deputy Regulation Counsel*

Margaret Brown Funk is Chief Deputy Regulation Counsel of the Office of Attorney Regulation Counsel. Her responsibilities include operations oversight for the Office of Attorney Regulation Counsel, which includes the Office of Attorney Admissions, Office of Attorney Registration, Office of Continuing Legal and Judicial Education, and the intake and trial divisions in the Office of Attorney Regulation Counsel. Ms. Funk graduated from the University of Denver College of Law in 1994 and was in private practice for 12 years before joining the Office of Attorney Regulation Counsel in 2006 as a trial attorney.

In private practice, Ms. Funk represented individuals in civil rights matters, primarily in the area of employment law. Between 1995 and 1998, she served as President and Vice President of the Colorado Plaintiffs Employment Lawyers Association (PELA). Between 1998 and 2005, she served as a member of the PELA board of directors and was assigned the duties of chair of the legislative committee and liaison to the Colorado Bar Association. She has published several articles in the Colorado Trial Lawyers Association's monthly magazine, *Trial Talk*, and has lectured extensively on civil rights, litigation, and legal ethics. She administers the Office of Attorney Regulation Counsel Trust Account School. She is a faculty member for the Colorado Supreme Court Office of Attorney Regulation Counsel Ethics School program and Professionalism School program, and has been a panelist and presenter at ABA conferences, NOBC conferences and numerous CLE programs in Colorado. Recent committee work includes the National Organization of Bar Counsel (NOBC) Program Committee; the Colorado Supreme Court Advisory subcommittee on Proactive, Management-Based Regulation; the Colorado Supreme Court Advisory subcommittee on C.R.C.P. 251 rule revision; the Colorado Supreme Court Standing Committee on the Colorado Rules of Professional Conduct; the Colorado Board of Continuing Legal and Judicial Education rule revision subcommittee; the Colorado Chief Justice's Commission on Professional Development, New Lawyer Working Group and Leadership Working Group; and the Colorado Bar Association's Peer Professionalism Assistance Group.

## **April M. McMurrey**

### *Deputy Regulation Counsel, Intake Division*

April McMurrey is Deputy Regulation Counsel in the intake division of the Office. Ms. McMurrey received her undergraduate degree from Colorado State University and her law degree from the University of Colorado School of Law. Ms. McMurrey joined the Office of Attorney Regulation in 2001 as a law clerk. She was later promoted to the trial division, where she worked for seven years as an Assistant Regulation Counsel. Ms. McMurrey then worked in the intake division as an Assistant Regulation Counsel before being promoted to Deputy.

Ms. McMurrey is a member of the Colorado Bar Association, the American Bar Association, the Colorado Bar Association Ethics Committee, and the American Bar Association Center for Professional Responsibility's Continuing Legal Education Committee.

## **Gregory G. Sapakoff**

### *Deputy Regulation Counsel, Trial Division*

Greg Sapakoff has been Deputy Regulation Counsel in the trial division of the Office since December 2017. Mr. Sapakoff grew up in Denver and graduated from North High School before attending and graduating from Colorado State University. He received his law degree from the University of Denver College of Law in 1986 and was admitted to the practice of law in Colorado that same year. He was also admitted to practice in the United States District Court for the District of Colorado, the 10th Circuit Court of Appeals, and the United States Court of Federal Claims.

In more than 20 years in private practice, Mr. Sapakoff represented clients in a variety of civil and commercial litigation matters; and represented and counseled lawyers and law firms in connection with legal ethics issues, attorney regulation proceedings, and civil matters arising from the practice of law. He worked for the Office of Attorney Regulation Counsel previously, from 1994-2005, as Assistant Regulation Counsel in the trial division.

Mr. Sapakoff is a member of the Denver and Colorado Bar Associations, and serves on the CBA's Ethics Committee. He also is a member of the American Bar Association and the ABA Center for Professional Responsibility, and the National Organization of Bar Counsel. Mr. Sapakoff served on the Committee on Conduct of the United States District Court for the District of Colorado from 2006-2012, and is a frequent speaker on topics relating to legal ethics.

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**Dawn M. McKnight**

*Deputy Regulation Counsel, Attorney and LLP Admissions, Registration, and Continuing Legal and Judicial Education*

Dawn McKnight is Deputy Regulation Counsel overseeing admissions, registration, and mandatory continuing legal and judicial education. Ms. McKnight received her undergraduate degree from San Francisco State University and her law degree from the University of Denver Sturm College of Law. After graduating from law school, Ms. McKnight practiced environmental law for a nonprofit, then became a civil litigation associate for a private firm. Prior to joining the Office of Attorney Regulation Counsel in 2016, Ms. McKnight was Assistant Executive Director and Publications Director of Colorado Bar Association CLE.

Ms. McKnight is a member of the National Organization of Bar Counsel; the American Bar Association; the Colorado Women's Bar Association; the National Conference of Bar Examiners/Council of Bar Admission Administrators; and the National Continuing Legal Education Regulators Association. She is also a Fellow of the Colorado Bar Foundation and a Circle of Minerva member of the Women's Bar Foundation. She currently serves as Chair of the Supervisory Committee of Options Credit Union.

Previously, she has served on the Board of Directors of the National Continuing Legal Education Regulators Association, the Board of Directors of the Colorado Women's Bar Association, the Denver Bar Association Board of Trustees, the Colorado Bar Association Board of Governors, the Board of Directors of the Association for Continuing Legal Education Administrators, the Board of Directors of Community Shares of Colorado, the Board of Directors of Options Credit Union, and the Board of Directors of the Denver Women's Hockey League.

**Intake Division****Assistant Deputy Regulation Counsel**

Lisa E. Pearce

**First Assistant Regulation Counsel**

Catherine S. Shea                      E. James Wilder

**Senior Assistant Regulation Counsel**

Jill Perry Fernandez                      Rhonda White-Mitchell

**Assistant Regulation Counsel**

Zoey Tanner

**Intake Division Investigators**

Melyssa Boyce                      Carla McCoy  
Rosemary Gosda

**Intake Assistants**

A. Juarez                      Margarita Lopez  
Robin Lehmann

**Trial Division****Assistant Deputy Regulation Counsel**

Erin Robson Kristofco

**First Assistant Regulation Counsel**

J.P. Moore

**Assistant Regulation Counsel**

Jonathan Blasewitz                      Jody McGuirk  
Samuel Kesten                      Michele Melnick  
Ryann A. Love                      Jonathan P. White

**Trial Division Investigators**

Laurie Seab,  
*Chief Investigator*

Juliet Berzsenyi                      Menley Fritch  
Jennifer Brown                      Donna Scherer

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**Trial Assistants**

Eleanor Finney  
Ava Henrickson

Valencia Hill-Wilson  
Rachel Ingle

**Inventory Counsel**

Jay Fernandez,  
*Inventory Counsel*

**Inventory Counsel Staff**

Laura Teaff,  
*Inventory Counsel Coordinator II*

Brenda Gonzales,  
*Inventory Counsel Coordinator I*

**Case Monitor**

Nicolette (Nicole) Chavez

**Admissions**

Andrea Kristjonsson,  
*Admissions Staff Attorney*

Jessica Crawley,  
*Admissions Administrator*

**Character & Fitness**

Susie Tehlirian,  
*Character and Fitness Staff Attorney*

Dyson McGuire,  
*Investigator*

Eric Nyquist,  
*Investigator*

**Licensure Analysts**

Jessica Faricy  
Gloria Lucero  
Lauren Paez  
Adrian Radase

**Staff Assistants**

Sean Conlin  
Sarah Frederiksen  
Christina Solano

## **Attorney and Licensed Legal Paraprofessional (LLP) Registration and Continuing Legal and Judicial Education**

Elvia Mondragon,  
*Clerk of Registration and Director of Continuing Legal and Judicial Education*

Julie Revers,  
*Deputy Director of Registration and Continuing Legal and Judicial Education*

Jessica DePari,  
*Assistant Administrator*

### **Deputy Clerks**

Sherry Fair  
Robert Fottrell  
Jennifer Kendall  
Kristie Miller

### **Operations**

Renee Anderson, *Staff Assistant*  
Karen Fritsche, *Operations Manager*  
Anna George, *Director of Technology*  
Kevin Hanks, *Office Manager*

Marci Hunter, *Accounting/Payroll*  
Kerry Miller, *Controller*  
David Murrell, *IT Support Technician*  
Zachary Moersch, *Systems Engineer*  
Steve Russell, *Senior Systems Engineer*

## WHO WE ARE: PERMANENT COMMITTEES

### **Legal Regulation Committee**

The Legal Regulation Committee was created as a permanent committee, which combined the functions of the Attorney Regulation Committee (“ARC”) and the Unauthorized Practice of Law (“UPL”) Committee. By rule, the Legal Regulation Committee (“LRC”) comprises at least nine volunteer members, including a Chair and Vice-Chair. At least six of the members must be attorneys admitted to practice in Colorado and at least two of the members must be non-attorneys. The LRC is the gatekeeper for all official disciplinary proceedings against respondent-attorneys and LLPs. It considers reports prepared by Office of Attorney Regulation Counsel attorneys and determines whether reasonable cause exists to seek discipline. The LRC also considers investigation-level diversion agreements. The LRC also has jurisdiction over allegations concerning the unauthorized practice of law, and considers reports prepared by the Office of Attorney Regulation Counsel to determine whether formal proceedings should be initiated based on such allegations.

Steven K. Jacobson<sup>5</sup>, *Chair*

Alison Zinn<sup>6</sup>, *Chair*

Jessica Schmidt<sup>7</sup>, *Vice-Chair*

Dr. Johnnie R. Bejarano

Elsa Djab Burchinow

Matthew A. Haltzman

Katherine L. Hays

David M. Johnson<sup>8</sup>

Martha Kent<sup>9</sup>

Kristin Shapiro

Charles Spence

Gavin Wolny<sup>10</sup>

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<sup>5</sup> Retired 3/6/2026

<sup>6</sup> Appointed Chair 3/7/2026

<sup>7</sup> Appointed Vice-Chair 3/7/2026

<sup>8</sup> Term Expiration 12/31/2025

<sup>9</sup> Term Expiration 12/31/2025

<sup>10</sup> Appointed 9/5/2025

## **Board of Law Examiners - Law Committee**

The Law Committee is composed of eleven volunteer attorney members. It reviews and approves the standards that must be met to pass the written examination and participates in the calibration of graders after administration of each exam.

Sunita Sharma, *Chair*

Anna N. Martinez, *Vice-Chair*

Stacey L. Aurzada

Keith Bradley

The Honorable Linda Connors

The Honorable Donald Delaney<sup>11</sup>

Jacob R. Lofgren<sup>12</sup>

Heather K. Kelly<sup>13</sup>

Jess D. Mekeel<sup>14</sup>

Julia Havens-Murrow

Charles E. Norton<sup>15</sup>

April Palma Roberts

Robert G. Spagnola

Matthew M. Wolf<sup>16</sup>

Justice Maria E. Berkenkotter (Liaison)

Justice William W. Hood, III (Liaison)

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<sup>11</sup> Appointed 1/1/2026

<sup>12</sup> Appointed 1/1/2026

<sup>13</sup> Term Expiration 12/31/2025

<sup>14</sup> Resigned 6/28/2025

<sup>15</sup> Term Expiration 12/31/2025

<sup>16</sup> Appointed 1/1/2026

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## **Board of Law Examiners - Character and Fitness Committee**

By Rule 202.3, the Character and Fitness Committee is composed of at least seventeen volunteer members, with at least twelve members being attorneys and at least five being non-attorneys. The Committee is charged with investigating applicants' character and fitness to practice law in Colorado by attorneys and licensed legal paraprofessionals (LLPs).

Brian Zall, *Chair*

David Beller, *Vice-Chair*

Robert L. Atwell, Ph.D.

Nicole Bartos

The Honorable Peter J. Cannici

Philip A. Cherner

Lilith Zoe Cole, Ph.D.

The Honorable Terry Fox

Daniel Graham

Melinda M. Harper

Velveta Golightly-Howell

John A. Jostad

Barbara Kelley

Kevin P. Kimery

The Honorable Lyudmyla Lishchuk

Tammy Eret Lynch

Kelly A. Manchester

Porya Mansorian

Michael K. Meeks<sup>17</sup>

Habib Nasrullah

John K. Priddy

Dana R. Spade

Elizabeth Strobel

Sandra M. Thebaud, Ph.D.

Gwyneth Whalen

Justice Maria E. Berkenkotter (Liaison)

Justice William W. Hood, III (Liaison)

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<sup>17</sup> Appointed 1/1/2026

## **Continuing Legal and Judicial Education Committee**

The Continuing Legal and Judicial Education Committee consists of nine members: at least six attorneys or LLPs, at least one of whom is a judge, and at least two non-attorneys (citizen members). The Committee administers the program requiring attorneys, judges, and licensed legal paraprofessionals (LLPs) to take mandatory continuing legal and judicial education courses.

The Honorable Andrew P. McCallin, *Chair*  
 Nathifa M. Miller, *Vice-Chair*  
 Christine M. Hernandez  
 The Honorable Amanda Hopkins<sup>18</sup>  
 Maha Kamal<sup>19</sup>  
 Megan Kearsley<sup>20</sup>

James Bennett Lebsack<sup>21</sup>  
 Colleen McManamon  
 Martha Rubi-Byers<sup>22</sup>  
 Rachel B. Sheikh<sup>23</sup>  
 Steven L. Terry  
 Justice Maria E. Berkenkotter (Liaison)  
 Justice William W. Hood, III (Liaison)

## **Board of Trustees, Attorneys' Fund for Client Protection**

The Board of Trustees is composed of five attorneys and two non-attorney public members. The trustees evaluate, determine and pay claims made on the Attorneys' Fund for Client Protection based on reports submitted by the Office of Attorney Regulation Counsel.

The Board of Trustees issues a separate report:

<http://www.coloradosupremecourt.com/AboutUs/AttorneysFundforClientProtection.asp>

The Honorable Adam J. Espinosa, *Chair*  
 Allison L. Gambill, *Vice-Chair*  
 Sonnie Fleming  
 Wesley D. Hassler

Corelle M. Spettigue  
 Elizabeth VanBroekhoven<sup>24</sup>  
 Kimberly Van Dyke  
 Justice Maria E. Berkenkotter (Liaison)  
 Justice William W. Hood, III (Liaison)

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<sup>18</sup> Resigned 10/30/2025

<sup>19</sup> Term Expiration 12/31/2025

<sup>20</sup> Appointed 1/1/2026

<sup>21</sup> Appointed 1/1/2026

<sup>22</sup> Term Expiration 12/31/2025

<sup>23</sup> Term Expiration 12/31/2025

<sup>24</sup> Appointed 6/7/2025

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## **Licensed Legal Paraprofessionals (LLP) Committee**

Through Rule 207.4, the Supreme Court created the Licensed Legal Paraprofessionals (LLP) Committee to launch and oversee the LLP Program. The Licensed Legal Paraprofessionals Committee consists of up to eleven volunteer members appointed by the Supreme Court. The Committee oversees the administration of written examinations, regulatory functions specific to LLP applications, and the practice of law by LLPs as set forth in Rule 207.

Angela R. Arkin, *Chair*

Amy M. Goscha, *Vice-Chair*

Katherine O. Ellis

Zachary J. Foxx<sup>25</sup>

Rayna Gokli

Melissa D. Johnson

Laura Landon

Leslii Lewis

The Honorable Michal Lord-Blegan

Rebekah I. Pfahler

David W. Stark

The Honorable Marianne M. Tims

Justice Maria E. Berkenkotter (Liaison)

Justice William W. Hood, III (Liaison)

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<sup>25</sup> Resigned 4/22/2025

## WHO WE ARE: OUR IMPORTANT PARTNERS

### **Colorado Lawyer Assistance Program (COLAP)**

The Colorado Lawyer Assistance Program is the free, confidential, and independent behavioral health program for Colorado's legal community. COLAP operates independently from other agencies and entities, including the OARC and the CBA. COLAP provides assistance for a wide variety of issues, including but not limited to: stress and burnout, empathic strain and vicarious trauma exposure, relationship issues, anxiety, depression, substance use or addiction concerns, improving well-being in the workplace, professional and career-related issues, and concern for colleagues or family members.

Established by Colorado Supreme Court Rule 254, COLAP's mission is to promote well-being, resiliency, and competency throughout Colorado's legal community. All communications with COLAP are confidential and privileged.

Elizabeth Lembo, *Executive Director*

Amy Phillips, *Assistant Director*

### **Colorado Office of Attorney Professional Excellence (APEX)**

The Colorado Office of Attorney Professional Excellence (APEX) is a program of the Colorado Supreme Court focused on shaping the future of law and closing the gap between the ideals of the legal profession and the lived reality by empowering legal professionals with the alliances, strategies, and actionable resources to achieve peak performance.

APEX serves as a statewide hub for professional excellence in law. Its work encompasses:

- Mentoring initiatives through the Colorado Attorney Mentoring Program that connect legal professionals across generations, practice areas, and communities.
- Entrepreneurship support through programs like Legal Entrepreneurs for Justice, helping lawyers and LLPs create sustainable, community-focused practices.
- Well-being leadership, including the Supreme Court Well-Being Recognition Program for Legal Employers, driving organizational change across the profession.
- Thought leadership and education that challenge the legal community to innovate while staying grounded in its highest ideals.

J. Ryann Peyton, *Executive Director*

Rebecca Payo, *Director of Mentoring and Community Engagement*

Lauren Solomon, *Program Manager*

## WHY WE REGULATE

The Colorado Supreme Court's regulatory offices and proactive programs strive to protect and promote the public's interest. To frame the objectives of this goal, in April of 2016 the Colorado Supreme Court adopted a preamble to the regulatory rules involving the practice of law:

The Colorado Supreme Court has exclusive jurisdiction to regulate the practice of law in Colorado. The Court appoints an Advisory Committee, Attorney Regulation Counsel, the Presiding Disciplinary Judge, the Executive Director of the Colorado Lawyer Assistance Program (COLAP), and the Executive Director of the Colorado Office of Attorney Professional Excellence (APEX) to assist the Court. The Court also appoints numerous volunteer citizens to permanent regulatory committees and boards to assist in regulating the practice of law.

The legal profession serves clients, courts and the public, and has special responsibilities for the quality of justice administered in our legal system. The Court has established essential eligibility requirements, rules of professional conduct and other rules for the legal profession. Legal service providers must be regulated in the public interest. In regulating the practice of law in Colorado in the public interest, the Court's objectives include:

1. Increasing public understanding of and confidence in the rule of law, the administration of justice and each individual's legal rights and duties;
2. Ensuring compliance with essential eligibility requirements, rules of professional conduct and other rules in a manner that is fair, efficient, effective, targeted and proportionate;
3. Enhancing client protection and promoting consumer confidence through the Office of Attorney Regulation Counsel, the Attorneys Fund for Client Protection, inventory counsel services, the regulation of non-lawyers engaged in providing legal services, and other proactive programs;
4. Assisting providers of legal services in maintaining professional competence and professionalism through continuing legal education; Attorney Regulation Counsel professionalism, ethics and trust account schools and other proactive programs;
5. Helping lawyers throughout the stages of their careers successfully navigate the practice of law and thus better serve their clients, through COLAP, APEX and other proactive programs;
6. Promoting access to justice and consumer choice in the availability and affordability of competent legal services;
7. Safeguarding the rule of law and ensuring judicial and legal service providers' independence sufficient to allow for a robust system of justice;
8. Promoting diversity, inclusion, equality and freedom from discrimination in the delivery of legal services and the administration of justice; and
9. Protecting confidential client information.

## WHAT WE DO: ADMISSIONS

Admissions is the first stop within the regulatory system for individuals wanting to practice law in Colorado. Attorney Regulation Counsel is charged with administering the attorney bar exam and licensed legal paraprofessional (LLP) exam, and conducting character and fitness reviews of bar exam, LLP exam, On Motion, and Uniform Bar Exam (UBE) score transfer applicants. By addressing concerns with applicants before they become practicing attorneys and LLPs, the character and fitness process takes a proactive role in protecting the public.

The Office works with the Colorado Supreme Court Law Committee, the Character and Fitness Committee, and the Colorado Licensed Legal Paraprofessionals Committee whose volunteer members provide advice and direction on the execution of the Office's duties.

### **Attorney Bar Exam**

Two attorney bar examinations are administered each year, one in February and one in July. The Law Committee, composed of 11 volunteer members appointed by the Supreme Court, reviews and approves the standards that must be met to pass the written examination and the eligibility requirements for attorney admissions. Additionally, the Office works with the Law Committee in coordinating two grading conferences each year following the administration of the bar exam, where experienced graders score the written portion of the bar examinations.

A total of 1,008 bar exam applications were submitted in 2025, for which 925 examinees sat for the attorney bar exam<sup>26</sup>. A total of 647 people passed the exam in 2025, achieving a Uniform Bar Exam (UBE) score of 270 or higher:

253 individuals applied for the February 2025 attorney bar exam, for which 220 took the bar exam:

- 116 Passed Overall (53% pass rate)
- 72 First Time Passers (65% pass rate)
- 44 Repeat Passers (40% pass rate)

756 individuals applied for the July 2025 attorney bar exam, for which 705 took the bar exam:

- 531 Passed Overall (75% pass rate)
- 502 First Time Passers (80% pass rate)
- 29 Repeat Passers (37% pass rate)

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<sup>26</sup> These numbers include applicants who may have sat for both the February and July exams. For detailed statistics on bar exam passage rates, see Appendix B.

## **Licensed Legal Paraprofessionals Exam**

The Supreme Court created the Licensed Legal Paraprofessionals (LLP) Committee to launch and oversee the LLP program. The LLP Committee consists of up to 11 volunteers appointed by the Supreme Court. The LLP Committee oversees the administration of written examinations, regulatory functions specific to LLP applications and the practices of law by LLPs as set forth in Rule 207.4. Two LLP examinations were administered in 2025, one in April and one in November, and two grading conferences were held following the administration of the exam.

2025 was the second year the LLP exam in Colorado was administered. A total of 55<sup>27</sup> LLP exam applications were submitted, for which 45 examinees sat for the LLP exam.

30 individuals applied for the April 2025 LLP exam, for which 23 took the LLP exam:

- 17 Passed Overall (74% pass rate)
- 16 First Time Passers (84% pass rate)
- 1 Repeat Passer (25% pass rate)

25 individuals applied for the November 2025 LLP exam, for which 22 took the LLP exam:

- 18 Passed Overall (82% pass rate)
- 16 First Time Passers (89% pass rate)
- 2 Repeat Passers (50% pass rate)

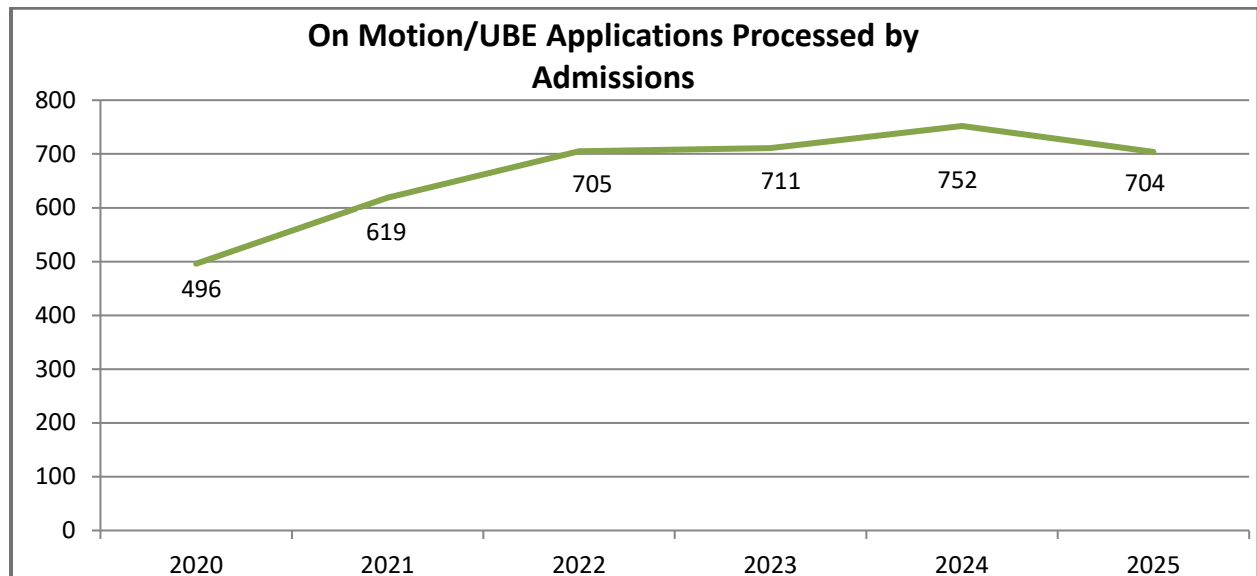
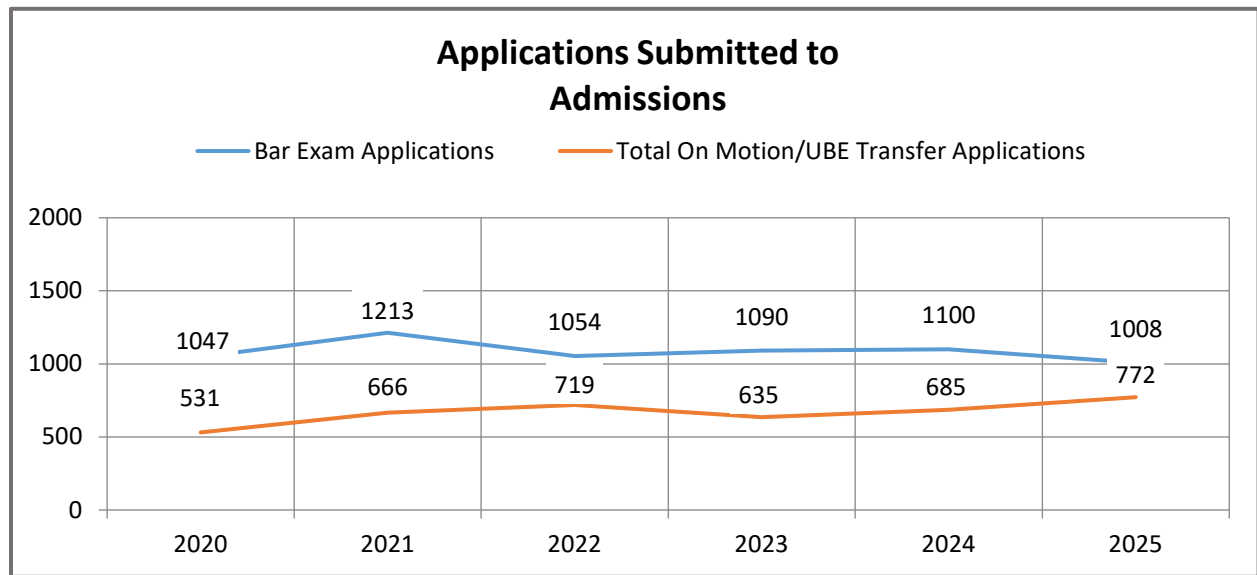
## **UBE and On Motion**

In 2025, there were 277 UBE Score Transfer Applications and 495 On Motion Applications filed with the Office. Including some applications still pending from 2024, the Office processed 239 UBE Score Transfer Applications and 465 On Motion Applications in 2025 – meaning those applicants were cleared for eligibility, and character and fitness requirements were completed.

The UBE, coordinated by the National Conference of Bar Examiners, is designed to test knowledge and skills that every lawyer should be able to demonstrate prior to becoming licensed to practice law. It results in a portable score that can be used to apply for admission in other UBE jurisdictions. The intent and design of the UBE is to ease the barriers to a multi-jurisdictional law practice. Colorado and more than 40 other jurisdictions currently comprise the UBE compact. With an increased number of jurisdictions adopting the NextGen UBE, it is foreseeable that Colorado will continue to see an increase in score transfer applications.

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<sup>27</sup> These numbers include applicants who may have sat for both the April and November exams.



## **Character and Fitness**

Every Bar Examination and Licensed Legal Paraprofessional (LLP) Examination, UBE Score Transfer and On Motion applicant undergoes a thorough Character and Fitness Investigation, the purpose of which is to protect the public and safeguard the system of justice. The Character and Fitness Committee is comprised of volunteer members appointed by the Colorado Supreme Court. The Character and Fitness Committee enforces the Character and Fitness standards and participates in inquiry panel interviews and formal hearings.

### ***On Motion Applicant:***

*"Just wanted to say I was admitted "On Motion" and was very impressed with how everyone I interacted with from your office was completely helpful, responsive, & kind..."*

The Colorado Supreme Court has established high standards of ethics for attorneys and LLPs which involve much more than measuring competence. Colorado lawyers and LLPs must have a record of conduct that justifies the trust of clients, adversaries, courts, and others with respect to the professional responsibilities owed to them. Therefore, applicants must demonstrate that they currently meet the standards and requirements established by the Colorado Supreme Court in order to be admitted to practice law.

**In 2025, Admissions reviewed 1759 Bar Exam, LLP Exam, On Motion, and Uniform Bar Exam applications to determine the character and fitness qualifications of the applicants:**

14 Inquiry Panel interviews were scheduled (11 applicants)<sup>28</sup>

- 10 Bar Exam applicants
  - 8 cleared for admission
  - 1 decision deferred by the panel for additional time and information
  - 1 recommendation of denial – applicant then withdrew their application
- 1 UBE score transfer applicant – postponed by applicant

2 Formal Hearings were scheduled for Bar Exam applicants who received a recommendation of denial by the Inquiry Panel (one applicant from 2023 and one applicant from 2024)

- 1 appeared for a Formal Hearing in 2025; the PDJ panel recommended denial. The Supreme Court issued an order of denial for admission.
- 1 requested a Formal Hearing to be held in 2025; the applicant withdrew their request for Formal Hearing prior to the hearing date; per C.R.C.P. 209.1 the recommendation of denial from the Inquiry Panel was filed with the Supreme Court. The Court issued an order of denial for admission.

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<sup>28</sup> Two applicants were granted postponements for their interviews; one applicant was scheduled twice, and one applicant was scheduled three times and is scheduled to appear in 2026.

C.R.C.P. 208.1 provides a list of traits, responsibilities, requirements and relevant conduct considered by the Character and Fitness Committee to determine if the applicant meets their burden of proving the requisite character and fitness to practice law in Colorado. The Rule directs the Character and Fitness Committee to determine relevant considerations and rehabilitation in deciding whether the applicant has met their burden.

**C.R.C.P. 208.1(5) provides that all applicants must meet all of the following essential eligibility requirements to qualify for admission to the practice of law in Colorado:**

- (a) The ability to be honest and candid with clients, lawyers, courts, regulatory authorities and others;
- (b) The ability to reason logically, recall complex factual information and accurately analyze legal problems;
- (c) The ability to communicate with clients, lawyers, courts and others with a high degree of organization and clarity;
- (d) The ability to use good judgment on behalf of clients and in conducting one's professional business;
- (e) The ability to conduct oneself with respect for and in accordance with the law;
- (f) The ability to avoid acts which exhibit disregard for the rights or welfare of others;
- (g) The ability to comply with the requirements of the Rules of Professional Conduct, applicable state, local, and federal laws, regulations, statutes and any applicable order of a court or tribunal;
- (h) The ability to act diligently and reliably in fulfilling one's obligations to clients, lawyers, courts and others;
- (i) The ability to use honesty and good judgment in financial dealings on behalf of oneself, clients and others; and
- (j) The ability to comply with deadlines and time constraints.

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Every applicant is considered individually based upon their personal history and record. A thoughtful and complete Character and Fitness Investigation takes a significant amount of time and involves a multi-step process. A Character and Fitness Investigation takes between six to twelve months, depending on the nature of the investigation, the issues involved, the applicant's response to requests for additional information, cooperation from outside sources, and volume of pending applications.

If appropriate, the Office of Attorney Admissions may send a letter to an applicant informing them of the Colorado Lawyer Assistance Program (COLAP) and its services. COLAP is a confidential resource available to recent law school students, graduates, licensed attorneys and LLPs. COLAP may be able to assist an applicant regarding potential character and fitness issues to help determine what steps can be taken to address a current condition or impairment and, if needed, identify appropriate resources for the applicant prior to being admitted to the practice of law.

***On Motion Applicant:***

*"I received the approval of my application. I'll move forward to register and take the oath next but wanted to thank you for your work on my application. I appreciate the time you took to work with me to cure deficiencies, get the referral attorneys to respond to the questionnaires, and your always helpful and prompt responses to my messages. Thank you very much, it's been a pleasure working with you."*

## WHAT WE DO: REGISTRATION AND CLJE

Once an applicant meets admission requirements, Registration completes the process by ensuring the proper administration of the oath. Attorneys and LLPs then register annually with the Office and pay annual license fees. The Office also maintains a record of lawyers', LLPs', and state judges' compliance with their continuing legal and judicial education requirements, as well as accreditation of continuing legal education activities.

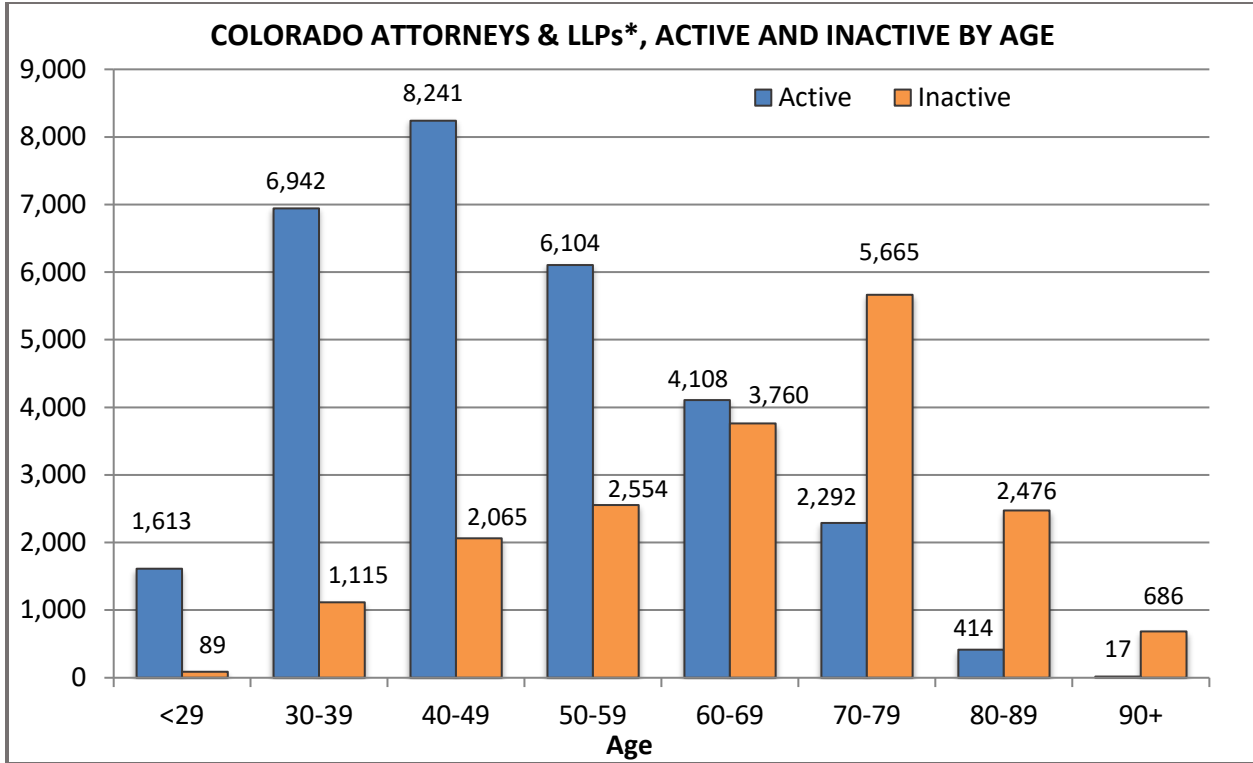
Colorado ended 2025 with 48,141 registered attorneys and 108 registered LLPs, up 1.9 percent over the previous year. Of those registered attorneys and registered LLPs, 29,731<sup>29</sup> were active and 18,410 were inactive. Inactive registrations grew by 2 percent, and active registrations increased by 1.9 percent in 2025. The LLPs who passed the November 2025 exam were not registered LLPs until January 2026. By the end of January 2026, a total of 126 LLPs were registered in Colorado.

### ***Attorneys' feedback on registration system:***

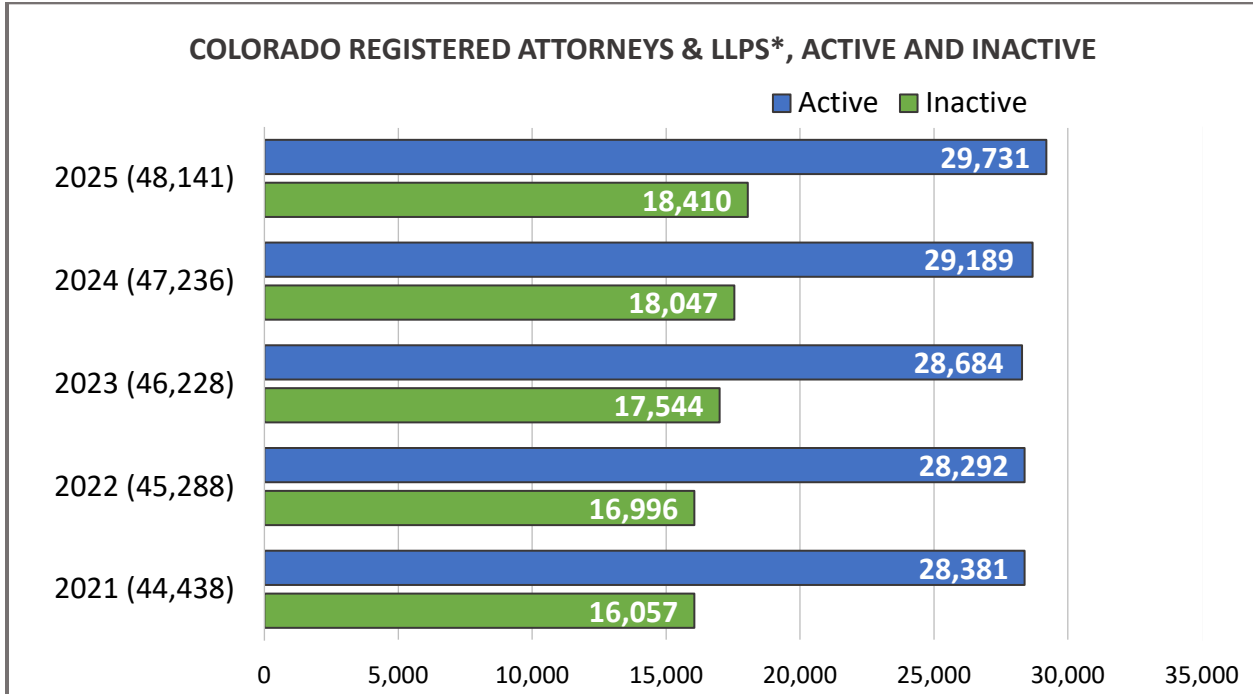
- *"Thank you!! You and your team there are so helpful! Talk about doing your job with professionalism! Have a great week!"*
- *"[T]hanks to you and your team for being so amicable and pragmatic. It's a lost art I find; I'm pleasantly surprised to find such an art being practiced in the offices of my regulator! You all are awesome. Thank you!"*
- *"Thank you for the amazing information. I appreciate your time in drafting and sending this to me."*

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<sup>29</sup> Includes 108 registered Licensed Legal Paraprofessionals (LLPs).



\*Registered LLPs: 6 (under 29), 26 (30-39), 37 (40-49), 29 (50-59), 8 (60-69), 2 (70-79), 0 (80-89), and 0 (90+)



\*Active numbers include LLPs.

## **Attorney and Licensed Legal Paraprofessionals (LLP) Registration**

Attorney and LLP Registration maintains the roll of licensed attorneys and LLPs in the state of Colorado. The annual license fees fund the Attorneys' Fund for Client Protection and fund the attorney and the LLP regulation system (including the Office of the Presiding Disciplinary Judge), attorney and LLP registration, continuing legal and judicial education, enforcement of the unauthorized-practice-of-law rules, the Colorado Lawyer Assistance Program, and the Colorado Office of Attorney Professional Excellence.

The Colorado registration form collects statistics on the legal practitioner's profession, including how many are practicing in-house, in government, and in a private law firm. Beginning in 2017, the Office has required lawyers and now LLPs in private practice to disclose whether they carry professional liability insurance and, if so, to disclose the name of their insurance carrier.

Maintaining an accurate picture of our lawyer and LLP population allows us to better serve the public and the profession by providing tailored resources to specific groups of practitioners in the future.<sup>30</sup>

### **In 2025, Registration processed 1,401 Attorney and 46 LLP admission enrollments:**

- Bar Exam: 632
- Uniform Bar Exam Transfers: 252
- On Motion: 427
- Licensed Legal Paraprofessionals Exam: 46
- Single-Client Certification: 85
- Law Professor Certification: 0
- Military Spouse Certification: 4
- Judge Advocate Certification: 0
- Foreign Legal Consultant: 1

### **In 2025, Registration also processed and approved applications for:**

- Pro Hac Vice: 750
- Practice Pending Admission: 135
- Pro Bono Certification: 37

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<sup>30</sup> For detailed statistics on demographics collected through registration in Colorado, see Appendix C.

## **Continuing Legal and Judicial Education**

Attorneys, LLPs, and state judges have to meet continuing legal education requirements on a three-year cycle. Attorney Regulation Counsel works with the Committee of Continuing Legal and Judicial Education to accredit CLE courses and activities, monitor CLE compliance, and interpret the rules and regulations regarding the Court's mandatory continuing education requirement for lawyers, LLPs and judges.

The Committee consists of nine members: at least six attorneys or LLPs, at least one of whom is a judge, and at least two non-attorneys (citizen members) who assist in administration of the mandatory continuing legal and judicial education system.

### **In 2025, the Office of Continuing Legal and Judicial Education:**

- Processed 141,387 CLE affidavits;
- Processed 4,651 Non-Accredited Out of State Seminar affidavits;
- Processed 1,482 Teaching Affidavits;
- Processed 77 Research/Writing Affidavits;
- Processed 8 additional CLE affidavits for mentoring;
- Processed 39 additional CLE affidavits for pro bono work; and
- Accredited 15,417 CLE courses and home studies, including 582 courses qualifying for equity, diversity and inclusivity (EDI) credit.

## WHAT WE DO: REGULATION

Attorney Regulation Counsel's traditional role is to investigate, regulate and, when necessary, prosecute attorneys accused of more serious violations of the Colorado Rules of Professional Conduct.

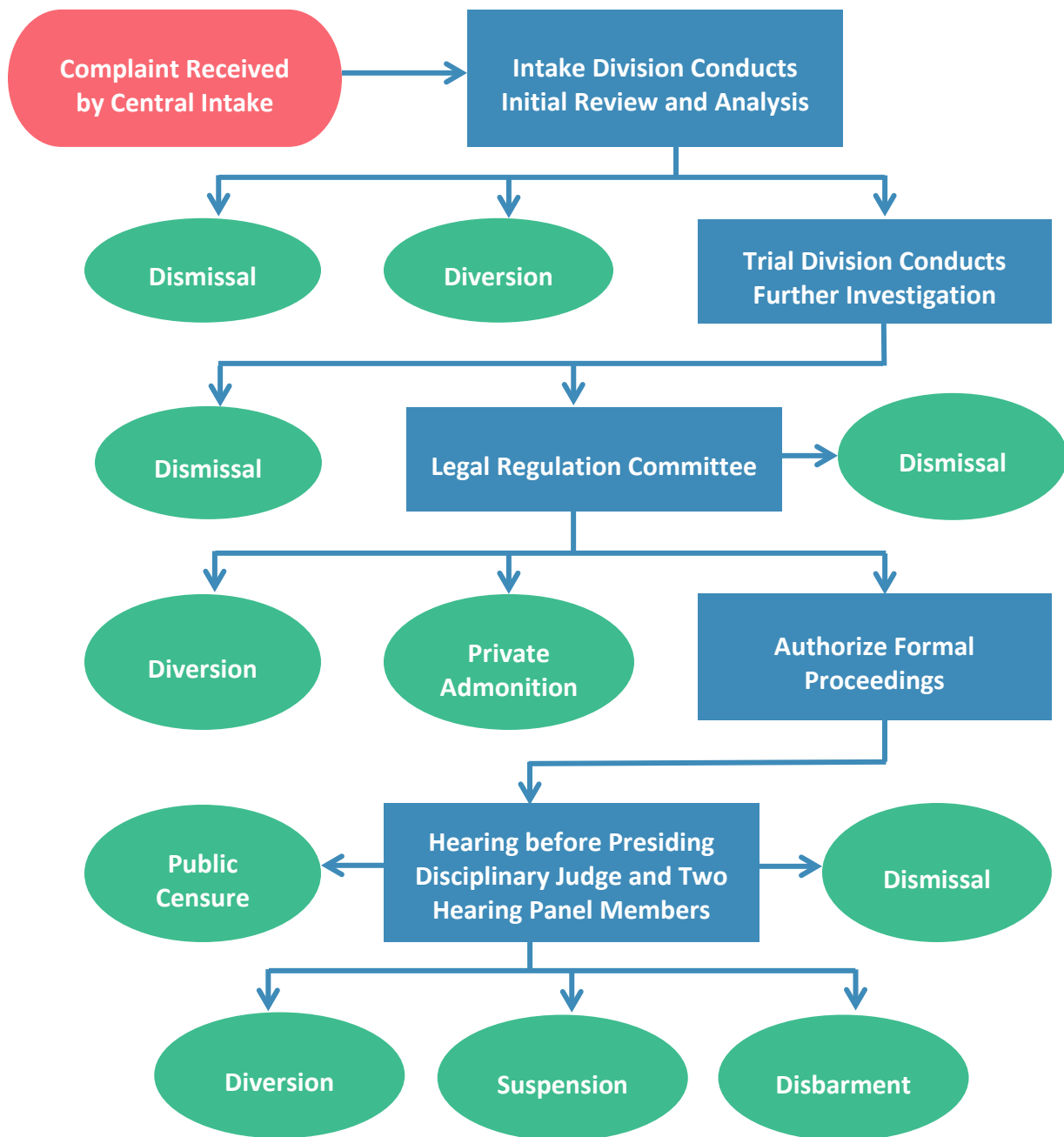
The Colorado model of attorney regulation is designed to move cases of minor ethical misconduct toward a quick resolution and devote its resources to cases that involve more serious attorney misconduct. The goal is to protect the public while educating attorneys, and now LLPs, to prevent any future misconduct.

In 2025, the office received 4,624 calls or written requests for investigation against a lawyer, a 4.4% percent increase from the prior year and a 36% percent increase from 2019. The Office's intake division reviewed those cases and processed 210 matters for further investigation by the trial division. In addition, the intake division continued to work on 354 cases carried over from 2024.

**In total, the Office of Attorney Regulation Counsel's work in 2025 resulted in the following educational or disciplinary action:**

- 121 dismissals with educational language;
- 41 diversion agreements;
- 11 private admonitions;
- 9 public censures;
- 38 suspensions;
- 21 probations ordered; and
- 5 disbarments.

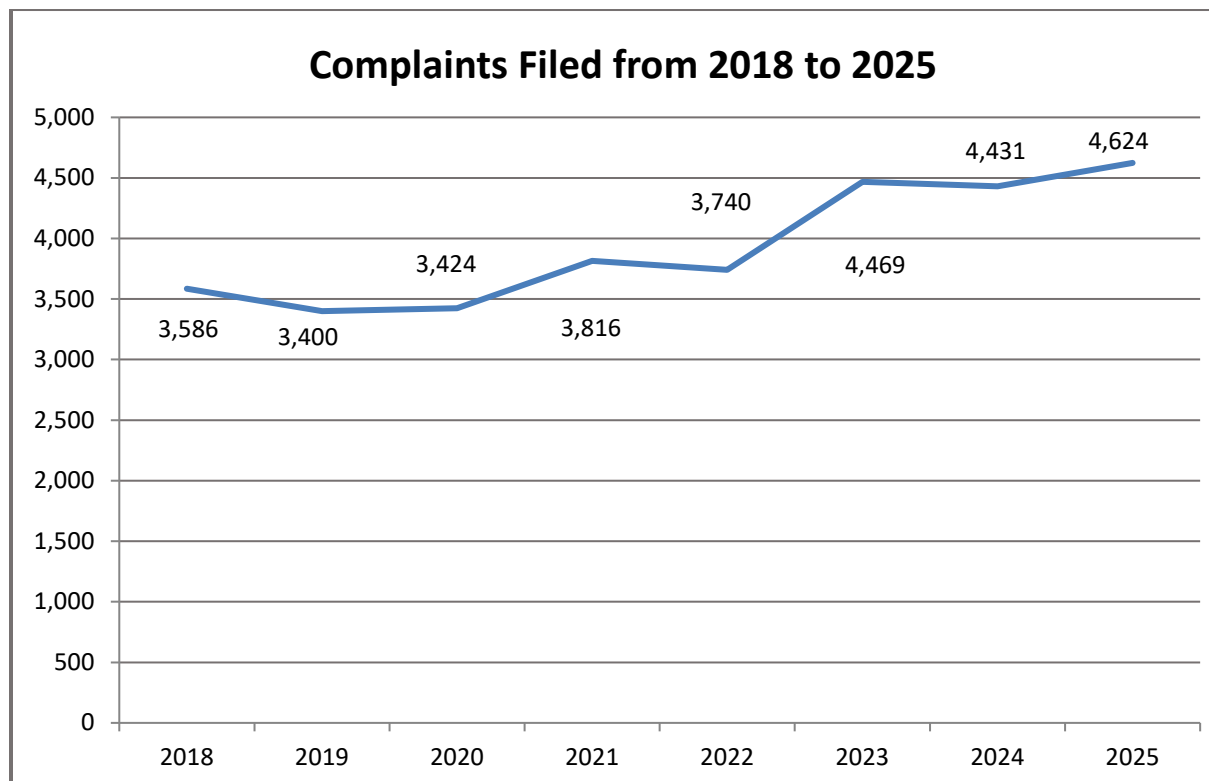
## The Regulation Process



## **Intake Division**

The intake division acts as the Office’s triage unit, where the 4,624 requests for investigation that the Office received in 2025 were analyzed.<sup>31</sup> Complaints are made by clients, opposing counsel, judges, and in some cases, concerned citizens.

Trained investigators take all calls and review written requests for investigation submitted to the Office. Thereafter, they assign the case to an intake attorney. Each intake attorney handles between 500-600 cases per year. That intake attorney reviews the facts to determine whether the Colorado Rules of Professional Conduct are implicated and whether further investigation is warranted. In most cases, the intake attorney speaks with the complaining witness by telephone to gather information regarding the complaint. The average intake processing time in 2025 was 5.3 weeks.



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<sup>31</sup> The Office deactivated the online complaint form in mid-October. It plans to reactivate an online complaint form in 2026. For detailed statistics on the intake division, see Appendices D through E.

If further investigation is warranted, that intake attorney requests the complaint in writing and corresponds with the respondent-attorney or LLP to determine whether the matter can be resolved at the intake stage, or whether the matter needs to be processed to the trial division for further investigation. Intake attorneys have numerous options for resolving a matter. They can dismiss cases outright; issue letters with educational language to the respondent-attorney or LLP; refer the matter for resolution by fee arbitration; or agree to an alternative to discipline involving education or monitoring in cases of minor misconduct. For those matters that warrant further investigation or involve allegations of more serious misconduct, the matter will be assigned to an attorney and investigator in the trial division for further investigation.

LLPs are subject to the same disciplinary procedures as attorneys. They must comply with the Colorado LLP Rules of Professional Conduct, which are very similar to the rules governing attorneys.

### **Magistrates**

Attorney Regulation Counsel is responsible for handling complaints against state court magistrates. These matters are reviewed pursuant to the Rules of Professional Conduct as well as the Canons of Judicial Conduct. In 2025, there were 180 requests for investigation filed against magistrates. One hundred seventy-five requests were dismissed at the intake stage, and five were still pending at the end of 2025.

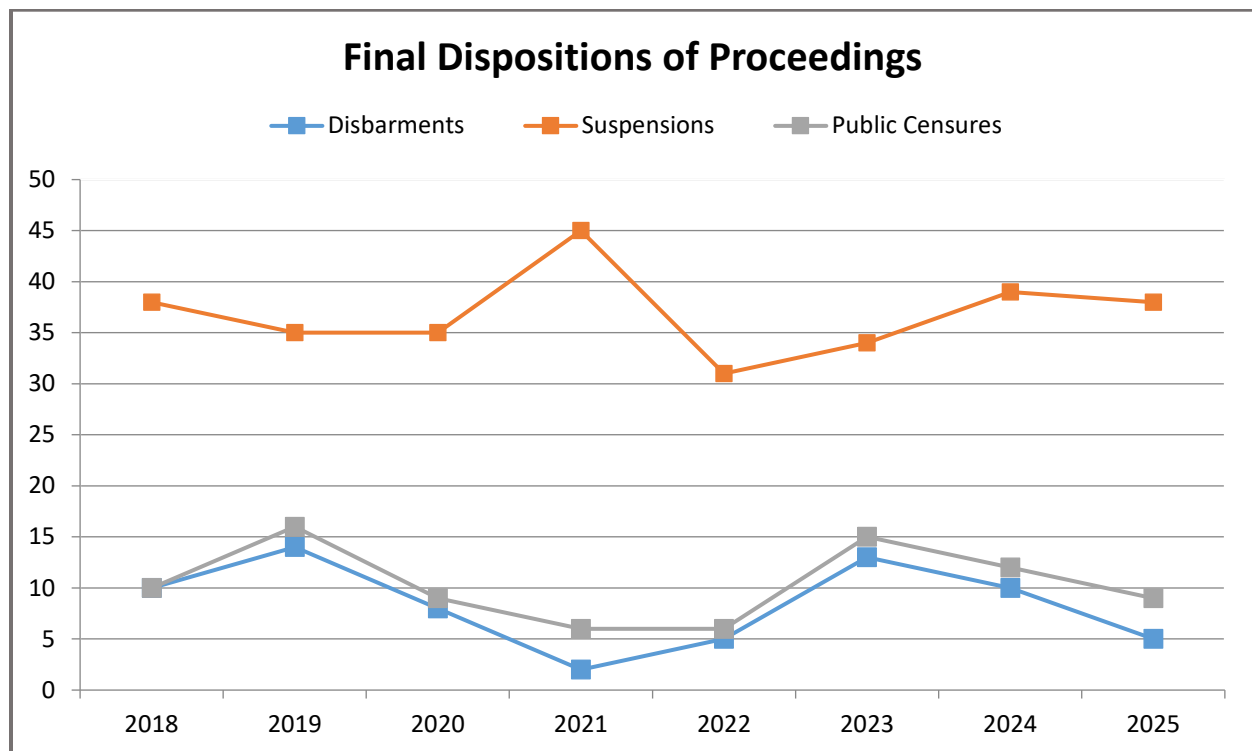
### **Trust Account**

Attorneys and LLPs in private practice are required to maintain a trust account in an approved Colorado financial institution. Those financial institutions agree to report any overdraft on the trust accounts to Attorney Regulation Counsel. Reports of overdrafts receive immediate attention. One of the Office's investigators is assigned to investigate all trust account notifications. That investigator meets weekly with the Deputy in intake to review the investigation and determine whether further investigation is warranted through the trial division. In 2025, the Office of Attorney Regulation Counsel received 93 trust account notices.

## **Trial Division**

The next step for a case that involves a complex fact pattern or allegations of serious misconduct is the trial division. In 2025, the trial division was assigned 210 cases processed by the intake division and also handled 153 cases carried over from 2024.<sup>32</sup>

At the end of the investigation, there are numerous potential outcomes, many intended to quickly resolve less serious matters. If, at the end of the investigation, a resolution other than dismissal is reached, assistant regulation counsel may recommend a formal proceeding, diversion agreement, or private admonition. These recommendations are presented to the Legal Regulation Committee (“LRC”). The LRC considers the recommendations prepared by Office of Attorney Regulation Counsel attorneys and determines whether reasonable cause exists to pursue discipline through a formal proceeding or private admonition, or whether to approve proposed agreements between Attorney Regulation Counsel and a respondent.



<sup>32</sup> For detailed statistics on the trial division process, see Appendices F through J.

**In 2025, the trial division:**

- Recommended the dismissal of 72 cases, 28 of them with educational language; and
- Entered 39 stipulations for conditional admission of misconduct which are approved by the Presiding Disciplinary Judge (PDJ).

If a matter is not suitable for dismissal and a stipulation cannot be reached with the respondent, the matter proceeds to the Legal Regulation Committee.

**In 2025, the trial division presented 77 matters to the Legal Regulation Committee. The Committee approved:**

- 27 formal proceedings concerning 43 matters;
- 15 diversion agreements concerning 17 matters; and
- 11 private admonitions.

Several of the 43 matters<sup>33</sup> in which the Office was authorized to file a formal complaint were consolidated.<sup>34</sup> In many cases, after authority to file a formal complaint was obtained, Attorney Regulation Counsel and the respondent-attorney entered into a conditional admission of misconduct approved by the PDJ, prior to filing of a formal complaint.

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<sup>33</sup> For detailed statistics on the dispositions by Legal Regulation Committee, see Table F-5, Appendix F.

<sup>34</sup> Because some matters are carried over from one calendar year to the next, the number of matters reviewed by the Legal Regulation Committee will not reconcile with the number docketed or completed in the investigative area.

**In 2025, after receiving authorization to file a formal complaint, the Attorney Regulation Counsel:**

- Filed 33 formal complaints;
- Resolved 3 matters by stipulation prior to filing a formal complaint; and
- After a formal complaint was filed, entered into 19 agreements for conditional admission of misconduct, which were approved by the PDJ.

The 33 formal complaints filed in 2025, and those pending from 2024, resulted in six attorney discipline trials before the Presiding Disciplinary Judge.

**Interim Suspensions**

The Office of Attorney Regulation Counsel may seek the interim suspension of an attorney's or LLP's license to practice law in order to protect the public. An interim suspension may be appropriate when there is reasonable cause to believe that an attorney or LLP is causing immediate and substantial public or private harm. Additionally, the Office can seek such action if an attorney or LLP is in arrears on a child-support order or is not cooperating with Attorney Regulation Counsel as required by the Colorado Rules of Professional Conduct.

**Of the 5 petitions for interim suspension sought by The Office of Attorney Regulation Counsel involved:**

- 1 failed to cooperate with Attorney Regulation Counsel's investigations; and
- 4 felony convictions.

One petition was denied.

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### **Disability Matters**

When an attorney or LLP is unable to fulfill professional responsibilities due to physical, mental, or behavioral illness, the Office of Attorney Regulation Counsel may file a petition to transfer an attorney or LLP to disability status. This is not a form of discipline. The Office filed 8 attorney disability matters in 2025.

### **Reinstatement and Readmission Matters**

Attorneys or LLPs who have been suspended for at least one year and one day must apply for reinstatement to be allowed to resume the practice of law. Attorneys or LLPs who have been disbarred must wait at least eight years before applying for readmission. The reinstatement and readmission processes are intended to assess the attorney's or LLP's fitness to return to the practice of law. In readmission and reinstatement matters, the applicant-attorney or applicant-LLP must prove rehabilitation and other elements by clear and convincing evidence. In 2025, nine attorney reinstatement or readmission matters were filed with the Office of Presiding Disciplinary Judge. Including matters carried over from 2024, five attorneys were reinstated, two denied and two were pending at the end of 2025. Three matters were withdrawn.

### **Attorneys' Fund for Client Protection**

Attorney Regulation Counsel assists the Board of Trustees for the Attorneys' Fund for Client Protection by investigating claims made on the fund alleging client loss due to the dishonest conduct of an attorney or LLP or for the loss of client funds due to an attorney's death.

The statistics for this work are shown in a separate annual report, posted on our website at: <http://www.coloradosupremecourt.com/AboutUs/AttorneysFundforClientProtection.asp>

### **Unauthorized Practice of Law**

The Office of Attorney Regulation Counsel, in coordination with the Legal Regulation Committee, investigates and prosecutes allegations of the unauthorized practice of law. The Legal Regulation Committee authorizes proceedings against individuals who are not licensed to practice law but are believed to be engaged in the practice of law.

In 2025, the Office of Attorney Regulation Counsel received 125 requests for investigation alleging the unauthorized practice of law by a non-attorney. Some requests did not proceed past the intake division, while others were processed to the trial division for further investigation.

**In 2025, the unauthorized practice of law matters included the following:**

- 15 requests were considered by the Legal Regulation Committee
  - 13 injunctive or contempt proceedings were commenced; and
  - 2 written agreement were reached with respondent to refrain from UPL conduct.
- 13 were dismissed by the Regulation Counsel after investigation in the trial division

The Legal Regulation Committee may direct trial counsel to seek a civil injunction by filing a petition with the Supreme Court or, in the alternative, offer the respondent an opportunity to enter into a written agreement to refrain from the conduct in question, to refund any fees collected, and to make restitution. Additionally, trial counsel may institute contempt proceedings against a respondent that is engaged in the unauthorized practice of law. *See C.R.C.P. 232.22 – 232.24.*

## WHAT WE DO: INVENTORY COUNSEL

When a Colorado attorney or LLP dies, becomes disabled, is suspended or disbarred, or is otherwise unable to protect the interests of their clients, Inventory Counsel is appointed to return client files and money held in trust, and at times, money held in business accounts. The file inventory and return process may take months or years depending on the number of files, areas of practice, level of organization of files, adequacy and availability of trust account records, and difficulty in locating clients.<sup>35</sup>

In 2025, Inventory Counsel returned \$14,833.79 to clients from lawyers' trust and business accounts. Inventory Counsel additionally disbursed \$50.00 in unclaimed funds to the Colorado Lawyer Trust Account Foundation. Pursuant to Colo. RPC 1.15B(k), funds disbursed to the Colorado Lawyer Trust Account Foundation may be returned to their owners, including clients, if in the future the owners can be determined and located. \$14,398.99 was paid in 2025 to the Colorado Attorneys' Fund for Client Protection from the trust accounts of deceased attorneys to reimburse the Fund for claims paid to clients of those deceased attorneys.

The Office of Attorney Regulation Counsel employs an attorney to handle Inventory Counsel matters. However, the Office of Attorney Regulation Counsel is very grateful for the assistance of lawyers who volunteer to be appointed as Outside Inventory Counsel on a pro bono basis with the assistance of the in-house Inventory Counsel. In 2025, twenty Colorado lawyers acted as Outside Inventory Counsel. The appointments of volunteer Outside Inventory Counsel allow the program to advance client protection and reach all corners of the state, especially communities outside the Front Range.

### **Outside Inventory Counsel**

*A special thanks to the following who acted as Outside Inventory Counsel:*

Shaun Pearman, Benjamin Jimenez, John Gleason, Lucy Deakins, Kevin C. Flesch, Brett Payton, Gregory Hock, Zachary Woodward, James S. Sheridan, Richard E. Samson, Jessie Aiken Rember, Troy M. Anderson, Patterson S. Weaver, Virginia A. Frazer-Abel, William P. Alderton, Margaret B. Walker, John M. Seebohm, Ana L. Burr, Eric Coakley, Kimberly Harter

<sup>35</sup> For additional statistics about Inventory Counsel, see Appendix K.

**In 2025, Inventory Counsel:**

- Filed 7 external and 13 internal petitions for appointment of inventory counsel;
- Closed 18 inventory matters;
- Contacted 1934 clients by letter and 521 clients by phone calls, whose files contained original documents, involved a felony criminal matter, or were considered current clients;
- Disbursed \$14,833.79 in trust and business accounts to clients;
- Disbursed \$14,398.99 to the Colorado Attorneys' Fund for Client Protection;
- Returned \$10,057.25 to one or more attorneys' estates;
- Inventoried 2192 client files;
- Inventoried 807 electronic files;
- Returned 339 files to clients or attorneys of record; and
- Filed 42 original wills with a district court(s).

***Inventory Counsel Client:***

*"Thank you so much for all your work here. I would have had no idea where to begin .... a truly wonderful service of the [OARC] and Supreme Court."*

## WHAT WE DO: CASE MONITOR

The cornerstones of Colorado's attorney and LLP regulation system are the diversion (alternative to discipline) agreement and probation conditions in discipline matters. Diversion agreements and probation conditions protect the public while allowing an otherwise competent attorney-respondent or LLP-respondent to continue practicing.

Central to these agreements is monitoring. A respondent must adhere to conditions agreed to by the Office and the respondent. Those conditions can include attendance at the Office's trust account school or ethics school, submitting to drug or alcohol monitoring, financial monitoring, practice audits and/or monitoring, or receiving medical or mental health treatment.

To ensure compliance, the Office employs a full-time case monitor. The case monitor's relationship with a respondent begins when the monitor sends a calendar detailing important compliance deadlines. Throughout the diversion or probation process, the monitor follows up with email reminders and phone calls if an attorney has missed a deadline.

The goal of the monitor is to help a respondent comply with their diversion or probation conditions to facilitate a successful transition back to normal law practice.

The case monitor also helps run the various schools for respondents intending to improve the provision of legal services to consumers.

### **In 2025, the case monitor:**

Ended the year with 922 cases being monitored for diversion agreement or other compliance requirements.

- Organized 5 virtual Ethics Schools, attended by 93 virtual attendees; and
- Organized 5 virtual Trust Account Schools, attended by 50 virtual attendees.

## WHAT WE DO: EDUCATION/OUTREACH

### **Presentations/Talks**

The Office of Attorney Regulation Counsel presented 67 public speeches in 2025.

Presentations/Talks Delivered	
2025	67
2024	54
2023	68
2022	59
2021	84
2020	118
2019	197

#### ***Feedback from a presentation:***

- *“I really appreciate your willingness to help the students learn about the various functions of your office. I already had one student tell me after class how valuable he found your lecture to be.”*

#### ***Feedback on a CLE Presentation:***

*“I want to express our sincere thanks for your contribution to our Annual Conference. The feedback from attendees has been excellent.”*

*“Here are a few comments we received:*

- *Excellent presentation well-targeted to a [our] audience. Very easy to listen to this speaker.*
- *Long-overdue presentation (“who’s the client”). Very well done - acknowledging the “quasi-corporate status of municipalities and the difference among corporate and muni “constituents”. All portion was also excellent and timely.*
- *The speaker was knowledgeable and handled the questions perfectly.”*

## **Ethics School**

The Office of Attorney Regulation Counsel created, designed, and staffs the Ethics School.

Year	Classes Presented	Attendance
2025	5	93
2024	5	109
2023	5	108
2022	5	132
2021	5	113
2020	5	109
2019	5	129

The school is a seven-hour course that focuses on the everyday ethical dilemmas attorneys confront. The course addresses the following issues:

- Establishing the attorney-client relationship;
- Fee agreements;
- Conflicts;
- Trust and business accounts;
- Law office management; and
- Private conduct of attorneys.

The Ethics School is not open to all attorneys. Rather, the respondent attending is doing so as a condition of a diversion agreement or dismissal, or pursuant to an order from the Presiding Disciplinary Judge or Supreme Court. The respondents attending Ethics School are provided with suggested forms and case law.

### ***Feedback from attendees of Ethics School:***

- *“This was the most informative training on the issues that I have heard. Thank you.”*
- *“The program as a whole was excellent, and I deeply appreciated the instructors, who were all very thorough, quick, efficient, but also explained the material clearly and concisely.”*

## **Trust Account School**

In 2003, the Office of Attorney Regulation Counsel created a four-hour school that addresses the correct method for maintaining a trust account. The course is designed for attorneys, LLPs or legal support staff. The course instructors are attorneys from the Office of Attorney Regulation Counsel.

Year	Classes Presented	Attendance
2025	5	50
2024	5	87
2023	4	69
2022	4	85
2021	4	82
2020	4	63
2019	5	56

The course is accredited with five legal ethics Continuing Legal Education credits and is open to all members of the bar. The cost of the course is minimal to encourage widespread attendance.

### ***Feedback from attendees of Trust Account School:***

- *“Friendly, knowledgeable, and very thoughtful with the delivery of information and alternative situations. I appreciate the robust information and the materials provided.”*
- *“Wonderful! Engaging and relevant presentation.”*
- *“It was really well organized and informative.”*

## **Professionalism School**

At the direction of the Supreme Court and in cooperation with the Colorado Bar Association, the Office of Attorney Regulation Counsel designed a professionalism school for newly admitted Colorado attorneys and LLPs. The Office of Attorney Regulation Counsel designed the curriculum and teaches the course in such a fashion as to address the most common ethical dilemmas confronted by newly admitted attorneys and LLPs. Attendance at the course is a mandatory requirement of admission to the Colorado Bar. On an annual basis, nearly 1,000 admittees attend and participate in the training. Lawyers from the Office of Attorney Regulation Counsel have committed hundreds of hours to the planning, administration, and presentation of the professionalism course. This course is separate and distinct from the ethics school and trust accounting school presented by the Office of Attorney Regulation Counsel. In 2025, the office led 9 separate presentations of the course.

## Appendix A:

### RESULTS OF VOLUNTARY, ANONYMOUS DEMOGRAPHIC SURVEY

Attorney and LLP Responses (**Active Status Only**): 5,379 (18.2% of active registration)

**TABLE A-1: Age as of January 1, 2025**

Response	Percentage
29 or younger	5.9%
30-39	21.3%
40-49	24.3%
50-59	20.6%
60-69	15.6%
70-79	10.6%
80-89	1.7%
90 or older	0.04%

**TABLE A-2: Race/Ethnicity/National Origin (can choose more than one)**

Response	Percentage
American Indian or Alaska Native	1.7%
Asian or Asian American	3.5%
Black or African American	3.2%
Hispanic, Latino or Spanish Origin	7.0%
Middle Eastern or North African	0.6%
Native Hawaiian or other Pacific Islander	0.3%
White or Caucasian	83.7%

**TABLE A-3: Physical or Mental Impairment Limiting Major Life Activities**

Response	Percentage
Yes	6.5%
No	93.5%

**TABLE A-4: Veteran or Active Duty Status**

Response	Percentage
Veteran or Active Duty	7.8%
Not a veteran	92.2%

**TABLE A-5: Gender Identity<sup>36</sup>**

Response	Percentage
Female	47.7%
Male	51.6%
Non-binary	0.7%

**TABLE A-6: Identify as Transgender**

Response	Percentage
Yes	0.7%
No	99.3%

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<sup>36</sup> The registration process also collects gender data and is more reliable than this voluntary survey.

**TABLE A-7: Sexual Orientation**

Response	Percentage
Bisexual	5.9%
Heterosexual	89.7%
Gay	2.7%
Lesbian	1.7%

**TABLE A-8: Years of Practice**

Response	Percentage
5 or fewer	14.8%
6-10	13.0%
11-15	13.4%
16-20	12.3%
21-25	10.6%
26-30	9.3%
31-35	7.8%
More than 35	18.9%

**TABLE A-9: Primary Work Location**

Response	Percentage
Colorado metropolitan area, population 150,000+	65.3%
Other city in Colorado, population 30,000-149,000	8.0%
Smaller mountain community in Colorado	6.1%
Smaller plains community in Colorado	1.3%
Other community in Colorado	0.9%
Not in Colorado	18.3%

## APPENDIX B:

### BAR EXAM STATISTICS

**TABLE B-1: February 2025 Attorney Bar Exam - Examination Statistics and Pass/Fail Rates**

#### FEBRUARY 2025 EXAMINATION STATISTICS

Total Who Took Exam: 220  
 Total Who Passed: 116 (53%)  
 Total Unsuccessful: 104 (47%)

Total Applicants: 253  
 Total Withdrawals: 23  
 Total of No Shows: 10

CO MBE Avg	CO MBE Median	CO MBE Range	Nat. MBE Avg	CO Std. Dev. MBE
134.96	135.10	93.4 – 179.8	130.82	17.0017

Avg Essay/PT	Essay/PT Range
134.4	93.5 – 174.7

CO UBE Avg	CO UBE Score Range	CO Std. Dev. UBE
269.42	187 – 346	31.88

#### Averages Scores

	Univ. of Denver	Univ. of Colorado	Other ABA*	Non-ABA/ Foreign Ed.**
<b>MBE:</b>	139.89	141.92	135.07	117.76
<b>Essay/PT:</b>	139.57	139.49	134.96	115.59
<b>Total Score:</b>	279.56	281.38	270.10	233.40

#### Range of Scores

	Univ. of Denver	Univ. of Colorado	Other ABA*	Non-ABA/ Foreign Ed.**
<b>MBE:</b>	107.0 – 179.8	121.1 – 171.1	99.6 – 177.5	93.4 – 148.5
<b>Essay/PT:</b>	100.0 – 171.5	108.1 – 161.8	93.5 – 174.7	93.5 – 165.0
<b>Total Score:</b>	207 – 346	232 – 331	204 – 338	187 – 312

\*Does not include Univ. of Denver and Univ. of Colorado.

\*\*Includes U.S. state-accredited and foreign law school graduates.

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## PASS/FAIL RATES

### By Law School

February 2025 Bar Exam

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Examinees	Law School	Passed		Failed		Total
<b>First Time</b>	University of Colorado	5	(71%)	2	(29%)	7
	University of Denver	27	(77%)	8	(23%)	35
	Other ABA	39	(71%)	16	(29%)	55
	Foreign Educated/ Non- ABA	1	(7%)	13	(93%)	14
		72	(65%)	39	(35%)	111
<b>Repeat</b>	University of Colorado	6	(67%)	3	(33%)	9
	University of Denver	13	(48%)	14	(52%)	27
	Other ABA	23	(37%)	39	(63%)	62
	Foreign Educated/ Non- ABA	2	(18%)	9	(82%)	11
		44	(40%)	65	(60%)	109
<b>All</b>	University of Colorado	11	(69%)	5	(31%)	16
	University of Denver	40	(65%)	22	(35%)	62
	Other ABA	62	(53%)	55	(47%)	117
	Foreign Educated/ Non- ABA	3	(12%)	22	(88%)	25
		116	(53%)	104	(47%)	220

## **TABLE B-2: July 2025 Attorney Bar Exam – Examination Statistics and Pass/Fail Rates**

### **JULY 2025 EXAMINATION STATISTICS**

**Total Who Took Exam: 705**  
**Total Who Passed: 531 (75%)**  
**Total Unsuccessful: 174 (25%)**

**Total Applicants: 755**  
**Total Withdrawals: 24**  
**Total of No Shows: 26**

CO MBE Avg	CO MBE Median	CO MBE Range	Nat. MBE Avg	CO Std. Dev. MBE
144.99	146.10	93.8 – 181.4	142.36	16.1453

Avg Essay/PT	Essay/PT Range
144.77	99 – 180

CO UBE Avg	CO UBE Score Range	CO Std. Dev. UBE
289.81	193 - 356	30.35

### **Averages Scores**

	Univ. of Denver	Univ. of Colorado	Other ABA*	Non-ABA/ Foreign Ed.**
<b>MBE:</b>	145.73	151.50	143.49	128.24
<b>Essay/PT:</b>	146.26	151.19	143.62	120.30
<b>Total UBE Score:</b>	292.01	302.77	287.16	248.63

### **Range of Scores**

	Univ. of Denver	Univ. of Colorado	Other ABA*	Non-ABA/ Foreign Ed.**
<b>MBE:</b>	101.3 – 181.4	112.4 – 177.1	98.2 – 180.3	93.8 – 174
<b>Essay/PT:</b>	102.8 – 178.2	111.9 – 172.6	99 – 180	99 – 169
<b>Total UBE Score:</b>	225 – 356	230 – 345	199 – 356	193 – 330

\*Does not include Univ. of Denver and Univ. of Colorado.

\*\*Includes U.S. state-accredited and foreign law school graduates.

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**PASS/FAIL RATES**
**By Law School**

 July 2025 Bar Exam
 

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<b>Examinees</b>	<b>Law School</b>	<b>Passed</b>		<b>Failed</b>		<b>Total</b>
<b>First Time</b>	University of Colorado	117	(93%)	9	(7%)	126
	University of Denver	181	(82%)	39	(18%)	220
	Other ABA	197	(75%)	66	(25%)	263
	Foreign Educated/ Non- ABA	7	(41%)	10	(59%)	17
		502	(80%)	124	(20%)	626
<b>Repeat</b>	University of Colorado	4	(57%)	3	(43%)	7
	University of Denver	6	(40%)	9	(60%)	15
	Other ABA	15	(38%)	24	(62%)	39
	Foreign Educated/ Non- ABA	4	(22%)	14	(78%)	18
		29	(37%)	50	(63%)	79
<b>All</b>	University of Colorado	121	(91%)	12	(9%)	133
	University of Denver	187	(80%)	48	(20%)	235
	Other ABA	212	(70%)	90	(30%)	302
	Foreign Educated/ Non- ABA	11	(31%)	24	(69%)	35
		531	(75%)	174	(25%)	705

### **TABLE B-3: April 2025 LLP Examination Statistics**

#### **APRIL 2025 LLP EXAMINATION STATISTICS**

<b>Total Who Took Exam:</b> 23	<b>Total Applicants:</b> 30
<b>Total Who Passed:</b> 17 (74%)	<b>Total Withdrawals:</b> 5
<b>Total Unsuccessful:</b> 6 (26%)	<b>Total No Shows/Ineligible:</b> 2

	<b>Pass</b>	<b>Fail</b>	<b>Total</b>
<b>First Time Takers:</b>	16 (84%)	3 (16%)	19
<b>Repeat Takers:</b>	1 (25%)	3 (75%)	4
<b>Overall:</b>	17 (74%)	6 (26%)	23

#### **Mean Score Distribution**

<b>Family Law Multiple Choice:</b> 77.25	<b>Ethics Multiple Choice:</b> 77.78
<b>Family Law Essay 1:</b> 36.52	<b>Family Law Essay 2:</b> 59.39

**Total Overall Score:** 70.06

**Total Overall Score Range:** 58.15 – 78.28

The six-hour LLP exam was created by numerous volunteer lawyers working with an exam development firm, with questions based on the family law core competencies for the LLP program and the LLP Rules of Professional Conduct. The LLP Committee and the Colorado Supreme Court relied on that firm's analysis as well as discussions with those involved in drafting and grading the LLP exam to arrive at the conclusion that examinees obtaining 68 percent or more of available points on the exam would be deemed to have passed the exam.

#### **Weighting Scheme:**

- 50% family law multiple-choice exam (90 questions; 180 minutes)
- 25% ethics multiple-choice exam (45 questions; 90 minutes)
- 25% family law essays (two essays; 90 minutes)

## **TABLE B-4: November 2025 LLP Examination Statistics**

### **NOVEMBER 2025 LLP EXAMINATION STATISTICS**

<b>Total Who Took Exam:</b> 22	<b>Total Applicants:</b> 25
<b>Total Who Passed:</b> 18 (82%)	<b>Total Withdrawals:</b> 1
<b>Total Unsuccessful:</b> 4 (18%)	<b>Total Ineligible:</b> 2

	<b>Pass</b>	<b>Fail</b>	<b>Total</b>
<b>First Time Takers:</b>	16 (89%)	2 (11%)	18
<b>Repeat Takers:</b>	2 (50%)	2 (50%)	4
<b>Overall:</b>	18 (82%)	4 (18%)	22

#### **Mean Score Distribution**

<b>Family Law Multiple Choice:</b> 76.72%	<b>Ethics Multiple Choice:</b> 78.38%
<b>Family Law Essay 1:</b> 15 of 35pts (42.86%)	<b>Family Law Essay 2:</b> 22 of 35 pts (62.86%)

**Total Overall Score:** 71.07%

**Total Overall Score Range:** 53.97% – 80.20%

The six-hour LLP exam was created by numerous volunteer lawyers working with an exam development firm, with questions based on the family law core competencies for the LLP program and the LLP Rules of Professional Conduct. The LLP Committee and the Colorado Supreme Court relied on that firm's analysis as well as discussions with those involved in drafting and grading the LLP exam to arrive at the conclusion that examinees obtaining 67 percent or more of available points on the exam would be deemed to have passed the exam.

#### **Weighting Scheme:**

- 50% family law multiple-choice exam (90 questions; 180 minutes)
- 25% ethics multiple-choice exam (45 questions; 90 minutes)
- 25% family law essays (two essays; 90 minutes)(total potential points on each essay was 35)

## Appendix C:

### REGISTRATION DEMOGRAPHICS

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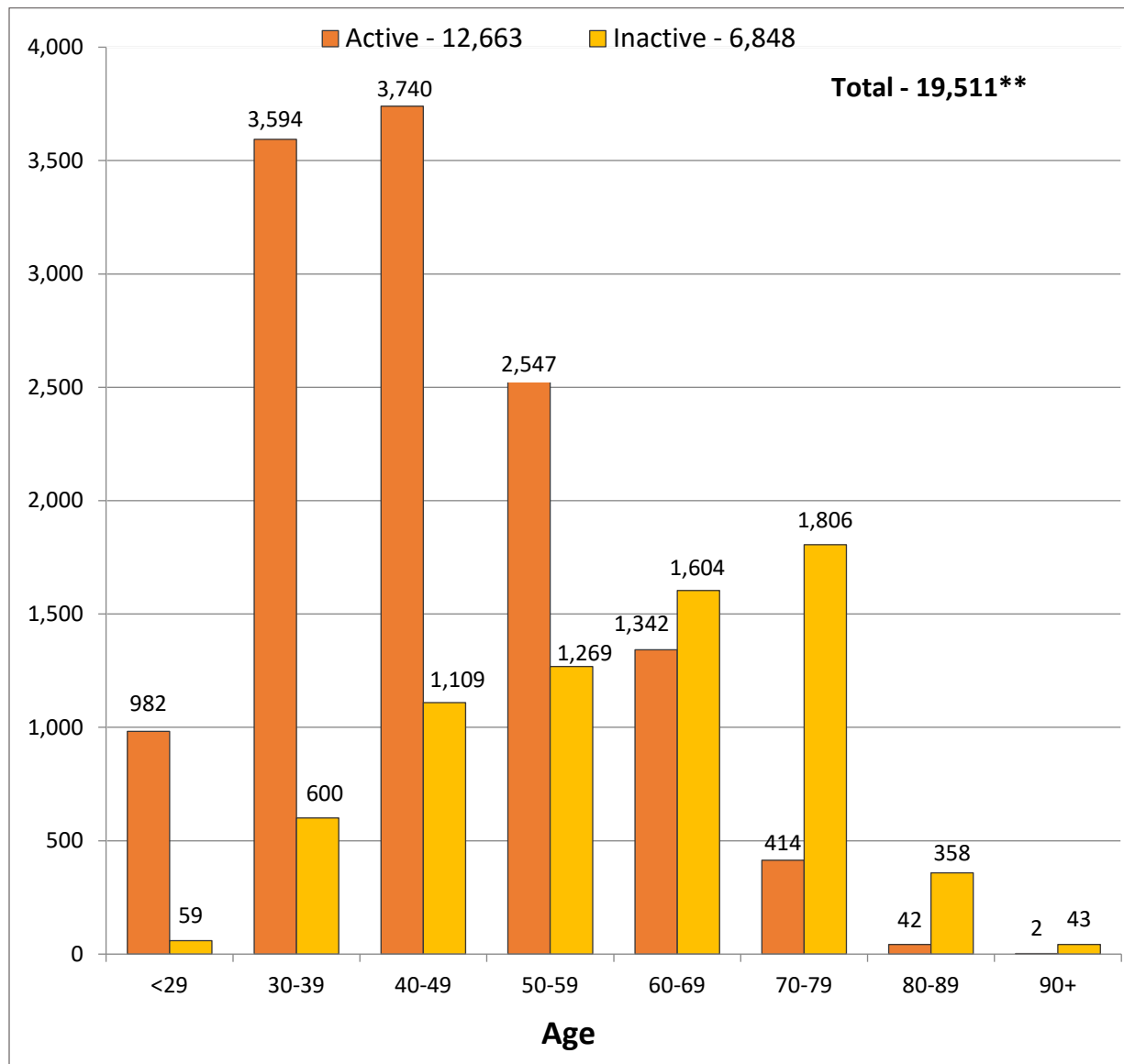
The Office of Attorney Regulation Counsel collects data from Colorado’s attorney and LLP registration forms to better analyze demographic information on the state’s attorney and LLP profession. With an accurate picture of Colorado’s attorney and LLP population, the Office hopes to provide better resources to specific groups of attorneys and LLPs in the future.

Given the interest in the Colorado’s LLP program, each number in this section for which LLPs are included is followed by a parenthetical reference to the number of LLPs within that total number of legal practitioners.

#### **Charts:**

- C-1: Colorado Female Attorneys and LLP, Active and Inactive By Age
- C-2: Colorado Male Attorneys and LLP, Active and Inactive By Age
- C-3: Active Attorneys and LLPs By Type of Practice
- C-4: Active Attorneys and LLPs by Age and Type of Practice
- C-5: Active Attorneys and in Government Practice, By Type of Practice
- C-6: Active Private Attorneys and LLPs With Malpractice Insurance
- C-7: Active Private Attorneys and LLPs Without Malpractice Insurance
- C-8: Active Private Attorneys and LLPs Large Firm With/Without Malpractice Insurance
- C-9: Active Private Attorneys and LLPs Medium Firm With/Without Malpractice Insurance
- C-10: Active Private Attorneys and LLPs Small Firm With/Without Malpractice Insurance
- C-11: Active Private Attorneys and LLPs Solo Practitioner Firm With/Without Malpractice Insurance

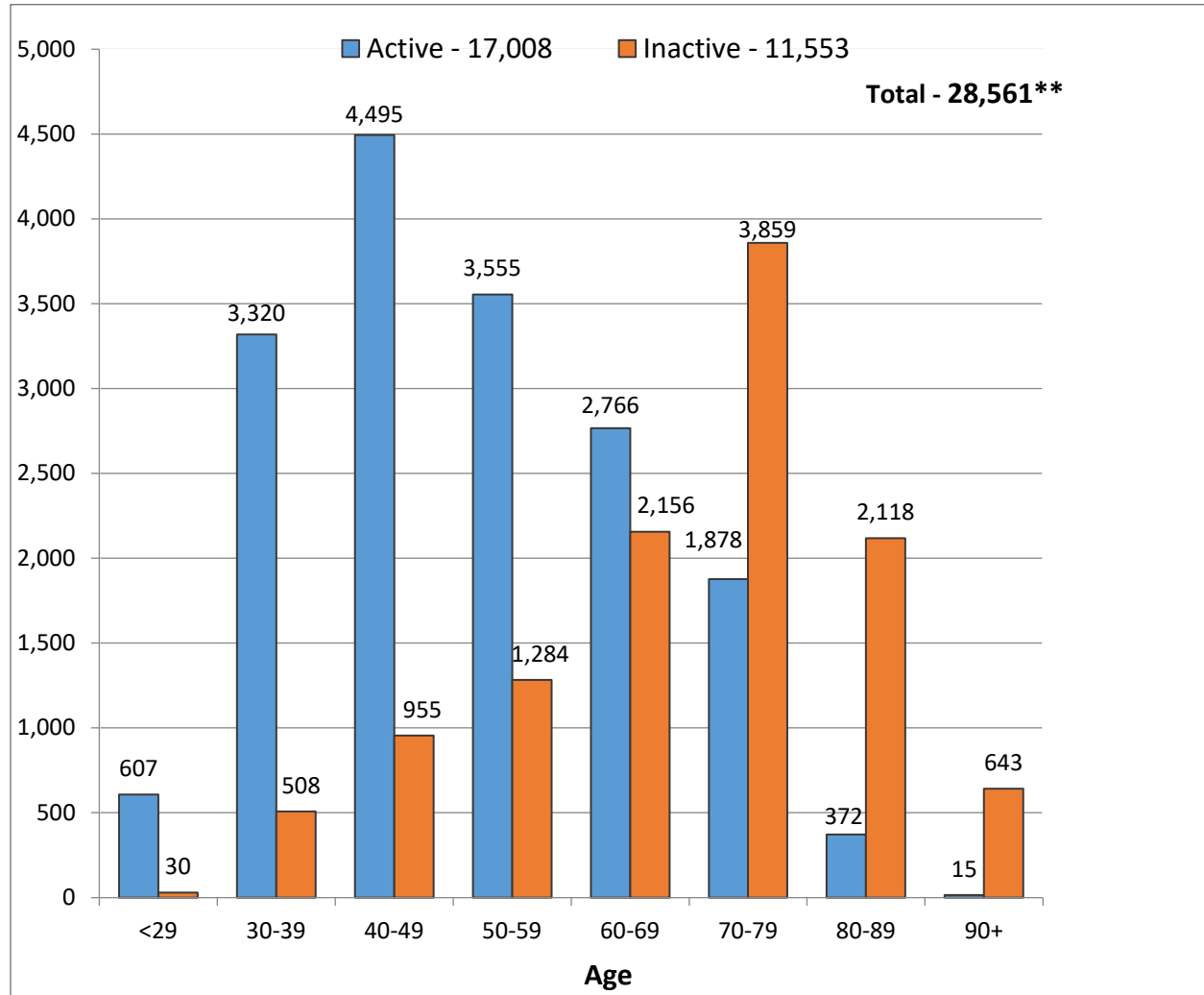
## CHART C-1: COLORADO FEMALE ATTORNEYS AND LLPS\*, ACTIVE AND INACTIVE BY AGE



\*Registered LLPS: 4 (under 29), 26 (30-39), 35 (40-49), 27 (50-59), 8 (60-69), 1 (70-79), 0 (80-89), 0 (90+)

\*\*69 registered attorneys elected not to list a gender on their registration (60 active and 9 inactive)

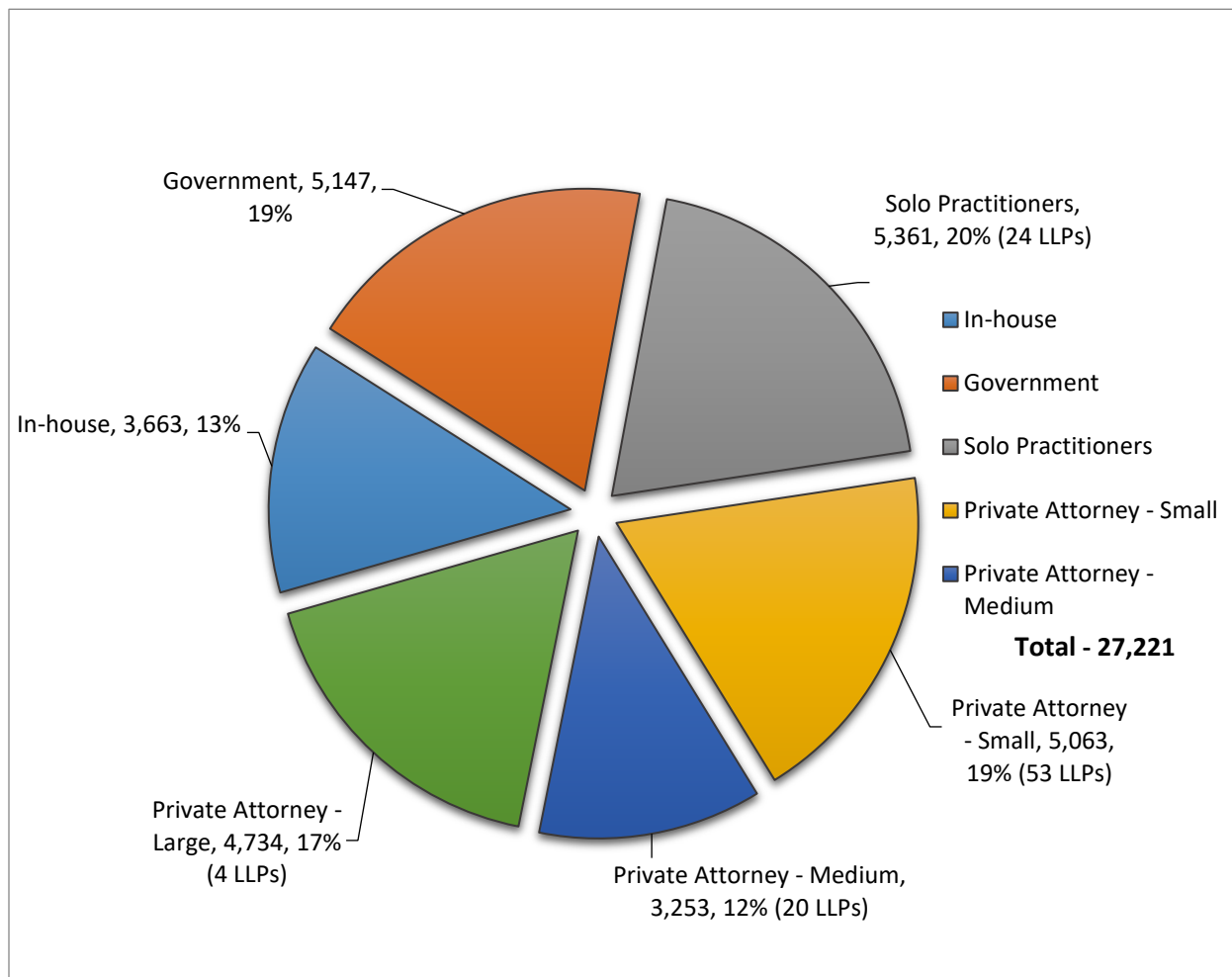
## CHART C-2: COLORADO MALE ATTORNEYS AND LLPS\*, ACTIVE AND INACTIVE BY AGE



\*Registered LLPs: 2 (under 29), 0 (30-39), 2 (40-49), 2 (50-59), 0 (60-69), 1 (70-79), 0 (80-89), 0 (90+)

\*\*69 registered attorneys elected not to list a gender on their registration (60 active and 9 inactive)

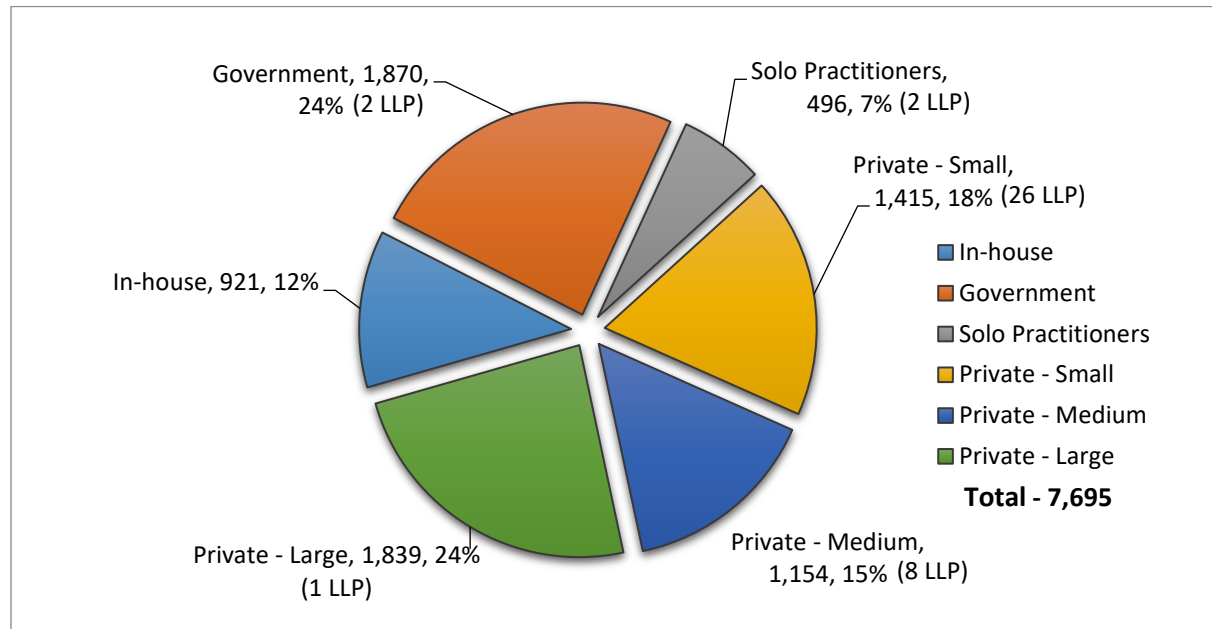
## CHART C-3: ACTIVE ATTORNEYS AND LLPS BY TYPE OF PRACTICE<sup>37</sup>



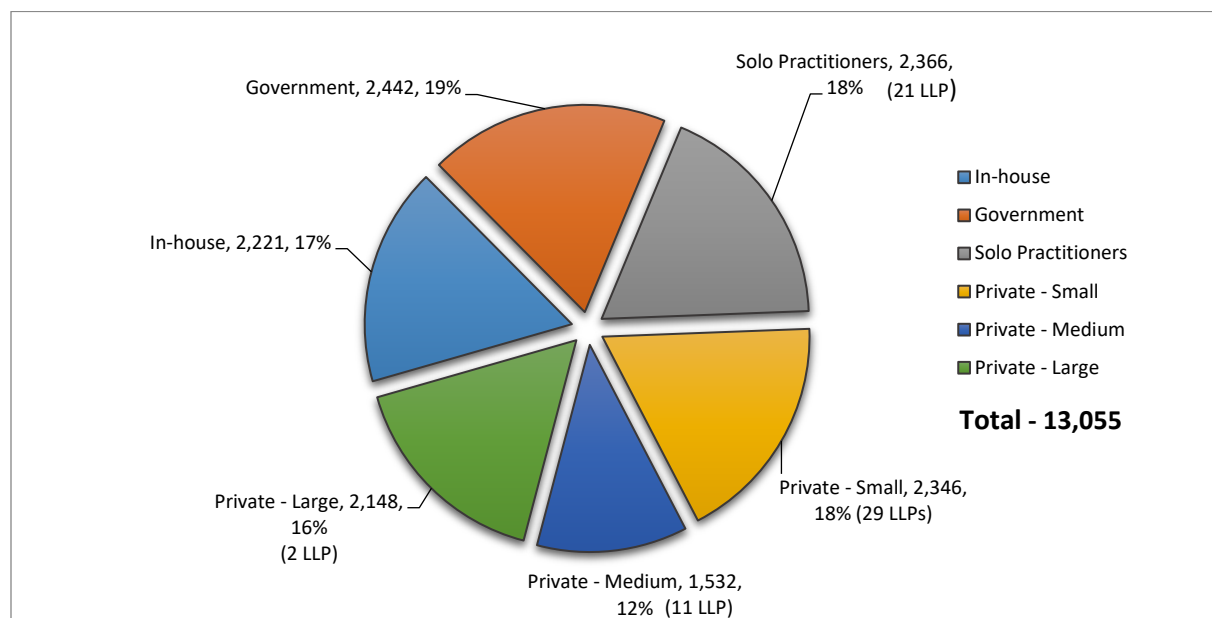
<sup>37</sup> Small firms are defined as 2-10 attorneys/LLPs; medium firms are 11-50 attorneys/LLPs; and large firms are 51 or more attorneys/LLPs. The remaining 2,510 active attorneys/LLPs not listed in the chart above are comprised of individuals holding a limited license or those that classified their type of practice as one of the following categories *other, retired, or teaching*.

## CHART C-4: ACTIVE ATTORNEYS AND LLPS BY AGE, AND BY TYPE OF PRACTICE

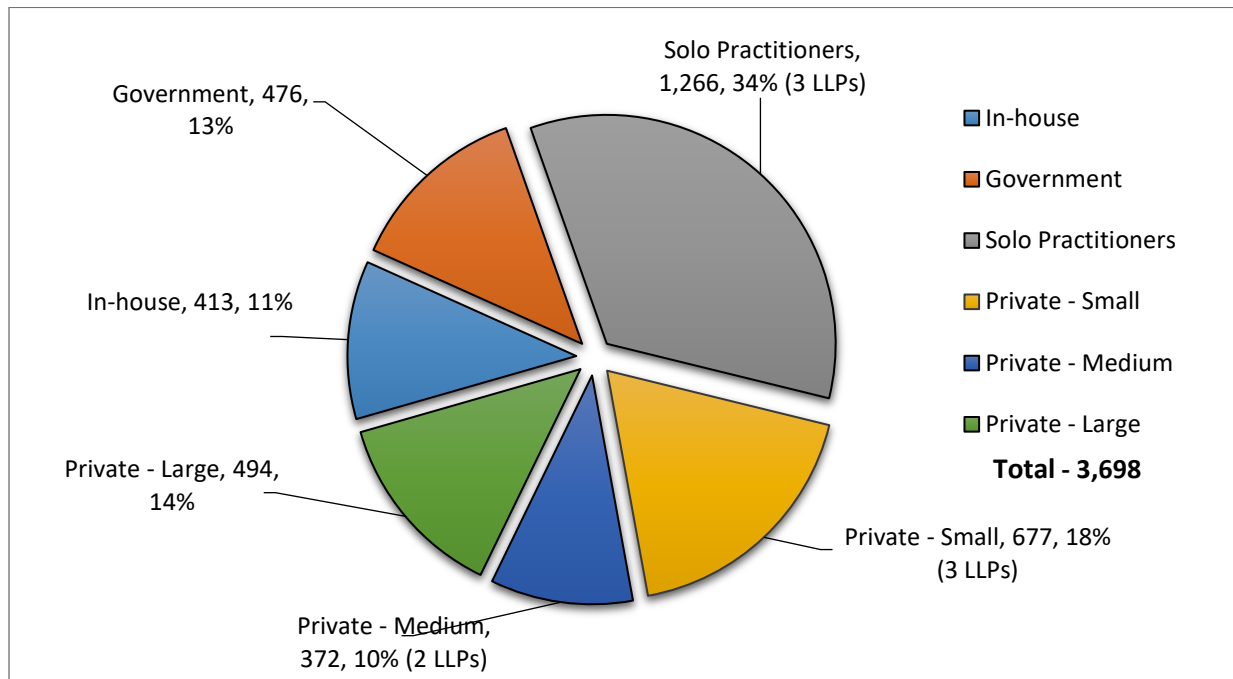
**A. AGE 20-39:** (Remaining 410 active attorneys not listed in the chart below are comprised of individuals holding a limited license or those that classified their type of practice as one of the following categories *other*, *retired*, or *teaching*.)



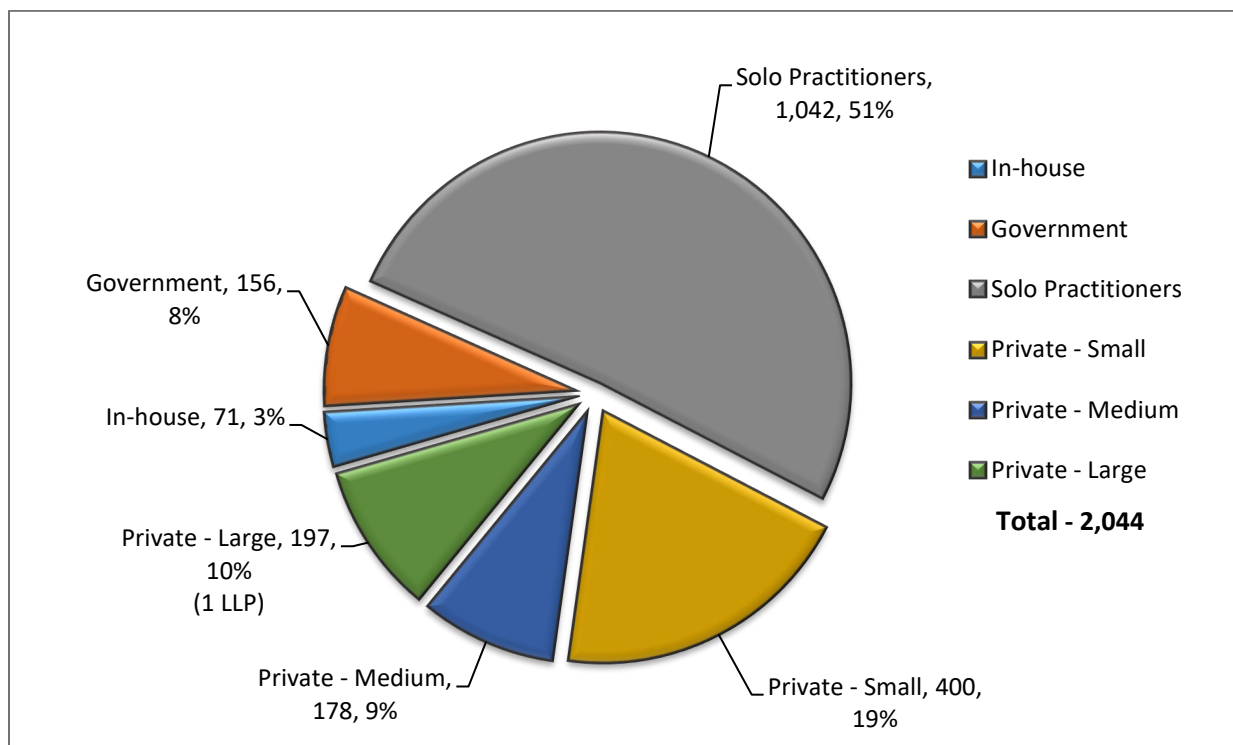
**B. AGE 40-59:** (Remaining 1290 active attorneys not listed in the chart below are comprised of individuals holding a limited license or those that classified their type of practice as one of the following categories *other*, *retired*, or *teaching*.)



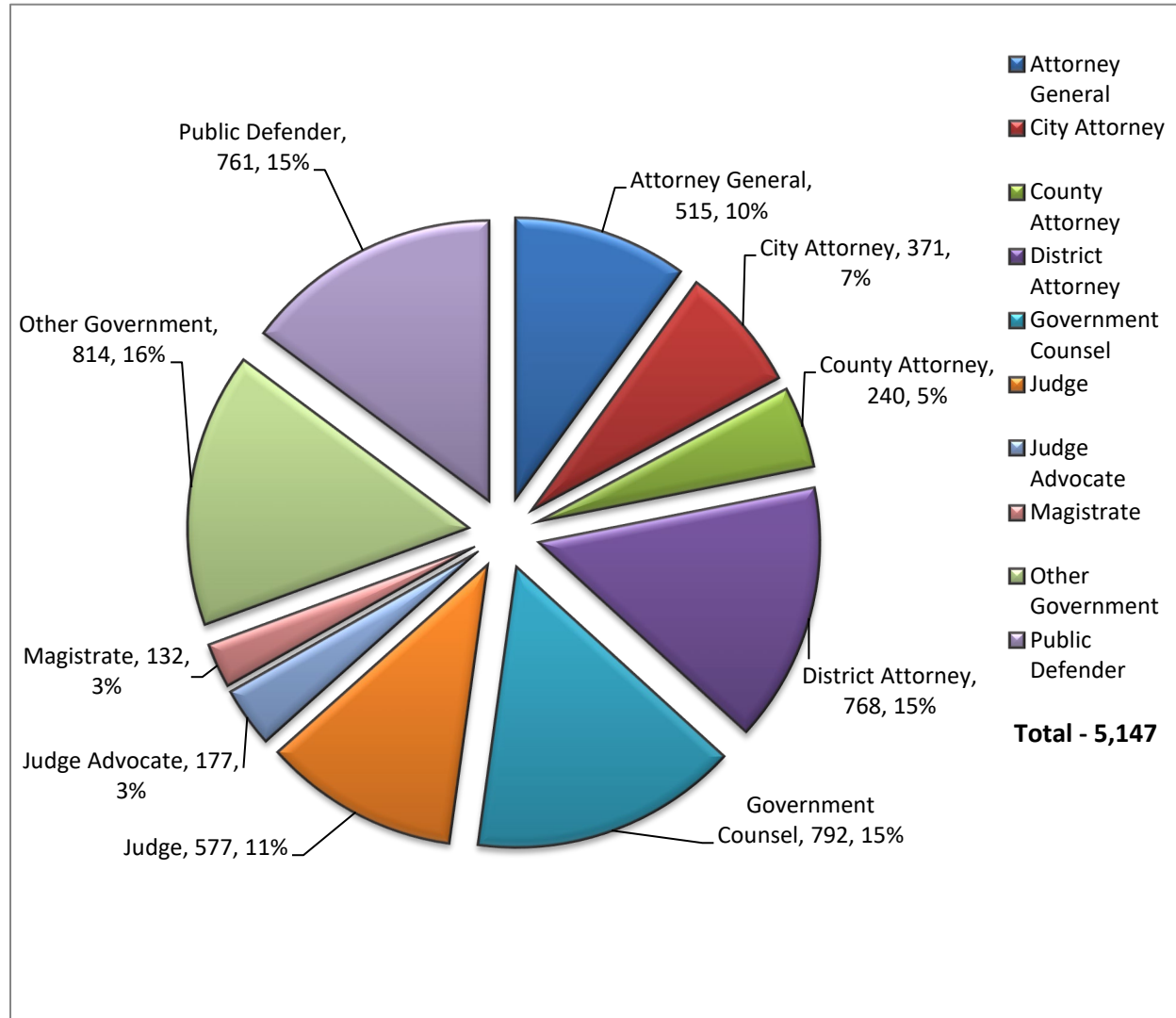
**C. AGE 60-69:** (Remaining 410 active attorneys not listed in the chart below are comprised of individuals holding a limited license or those that classified their type of practice as one of the following categories *other*, *retired*, or *teaching*)



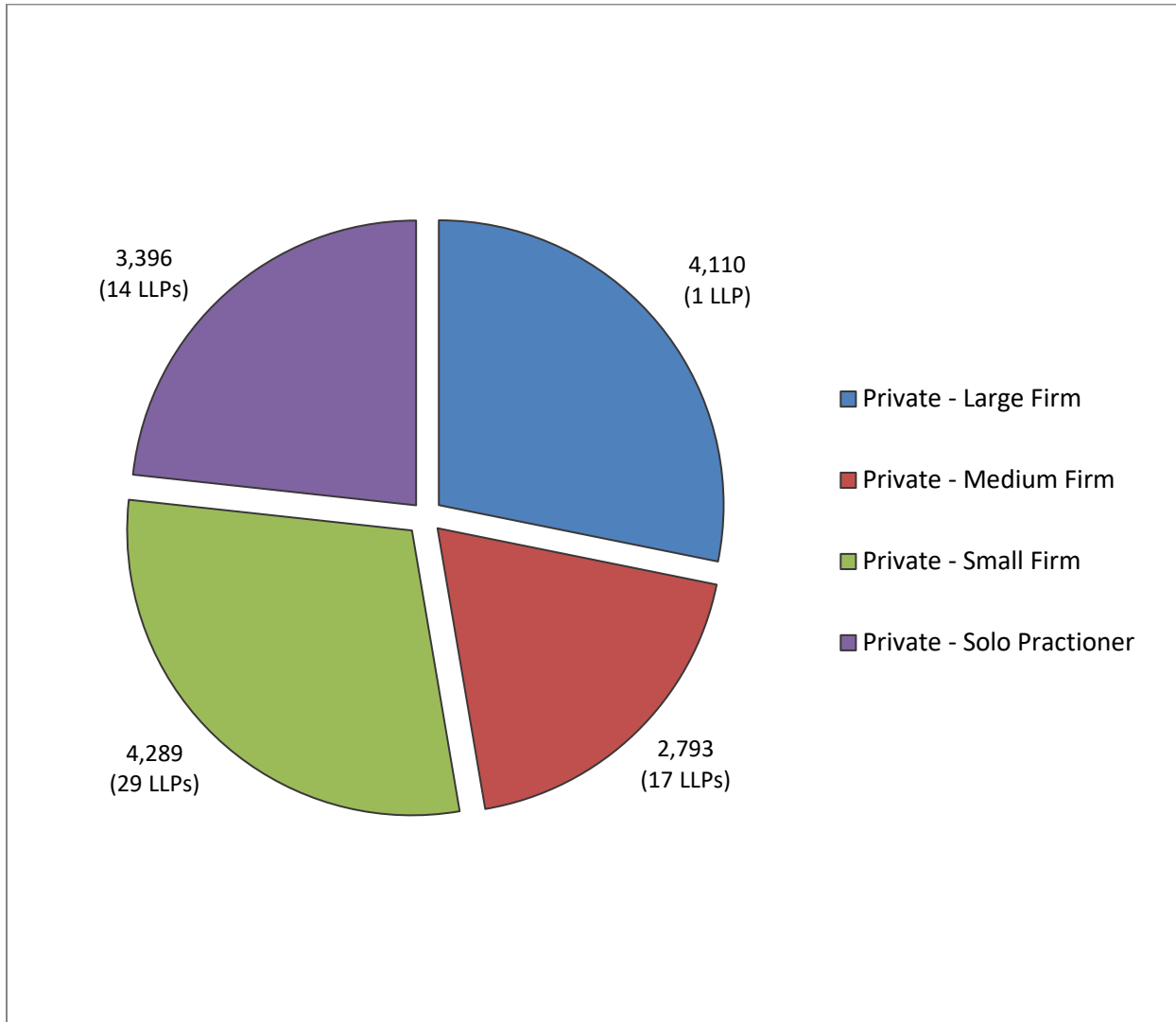
**D. AGE 70-79:** (Remaining 248 active attorneys not listed in the chart below are comprised of individuals holding a limited license or those that classified their type of practice as one of the following categories *other*, *retired*, or *teaching*.)



## CHART C-5: ACTIVE ATTORNEYS IN GOVERNMENT PRACTICE, BY TYPE OF PRACTICE

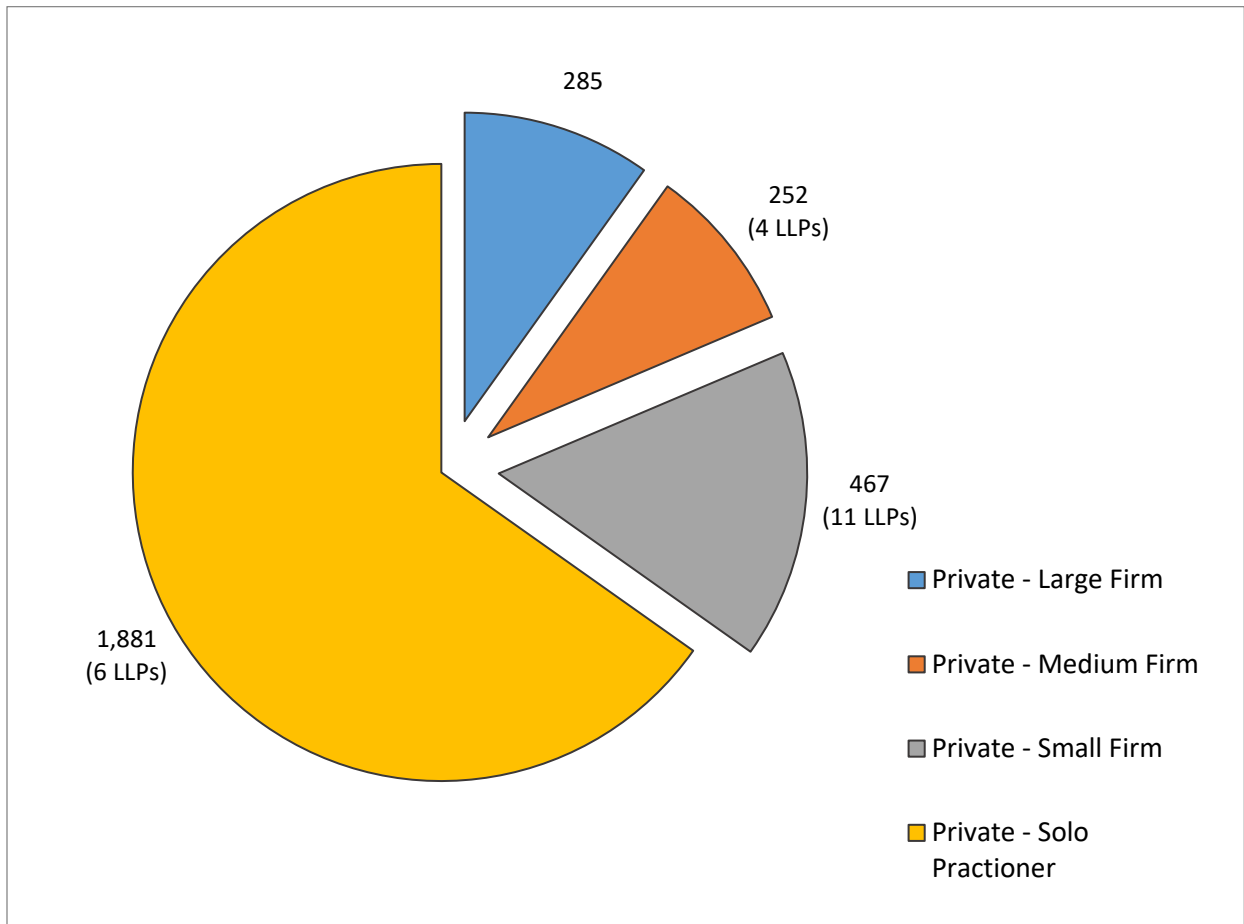


## CHART C-6: ACTIVE PRIVATE ATTORNEYS AND LLPS WITH MALPRACTICE INSURANCE<sup>38</sup>

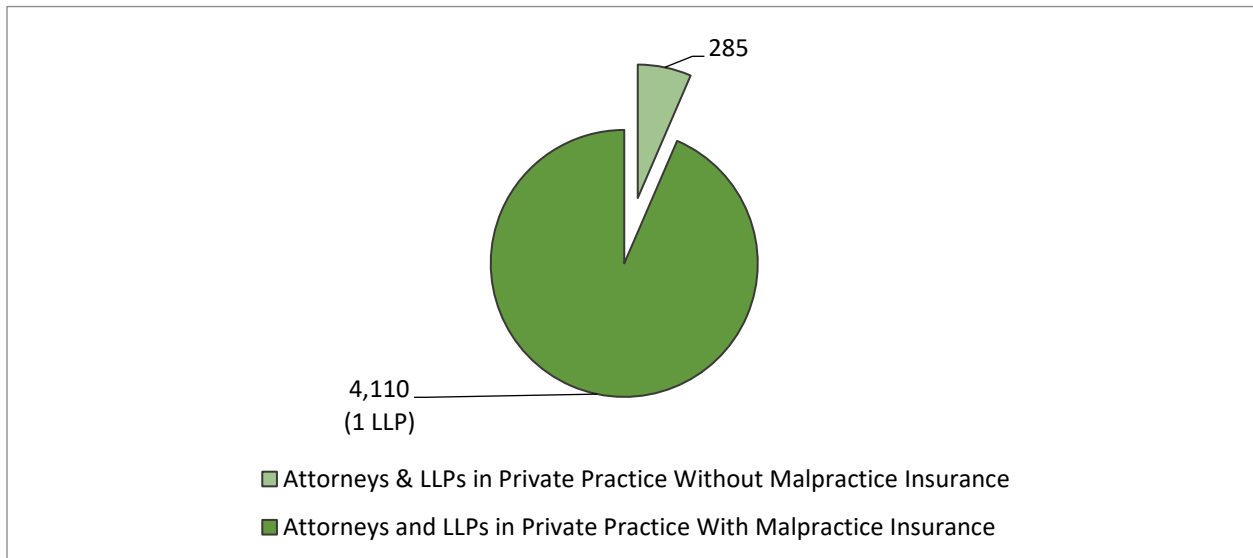


<sup>38</sup> Small firm, 2-10 attorneys/LLPs; medium firm, 11-50 attorneys/LLPs; and large firm, 51-plus attorneys/LLPs.

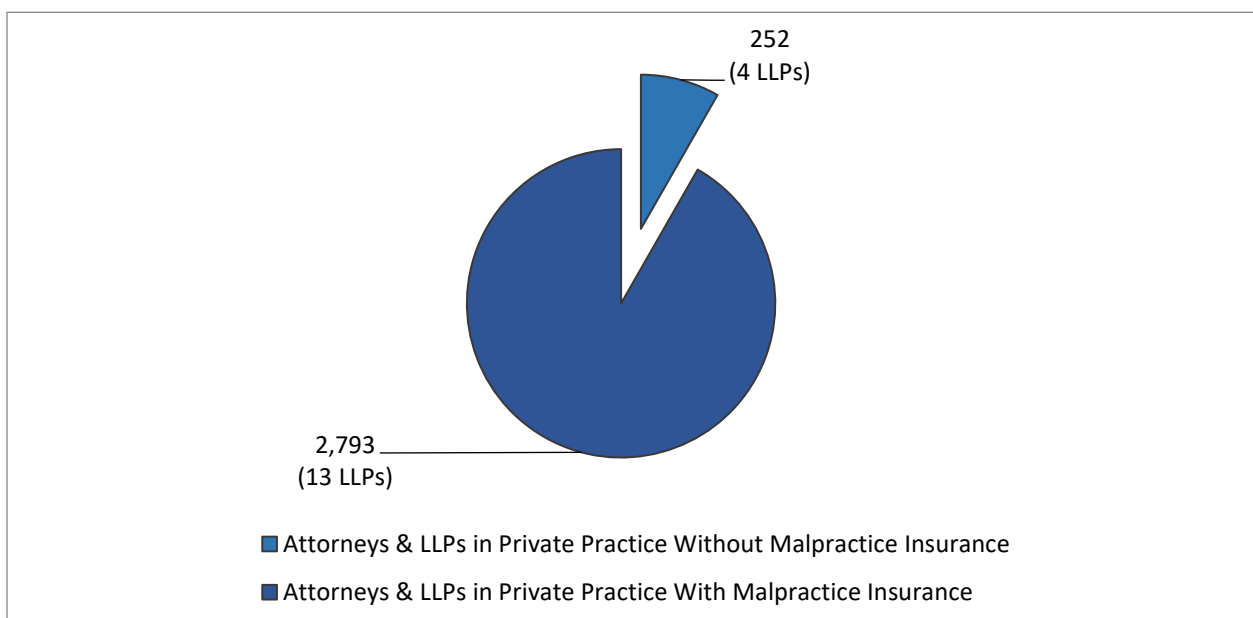
## CHART C-7: ACTIVE PRIVATE ATTORNEYS AND LLPS WITHOUT MALPRACTICE INSURANCE



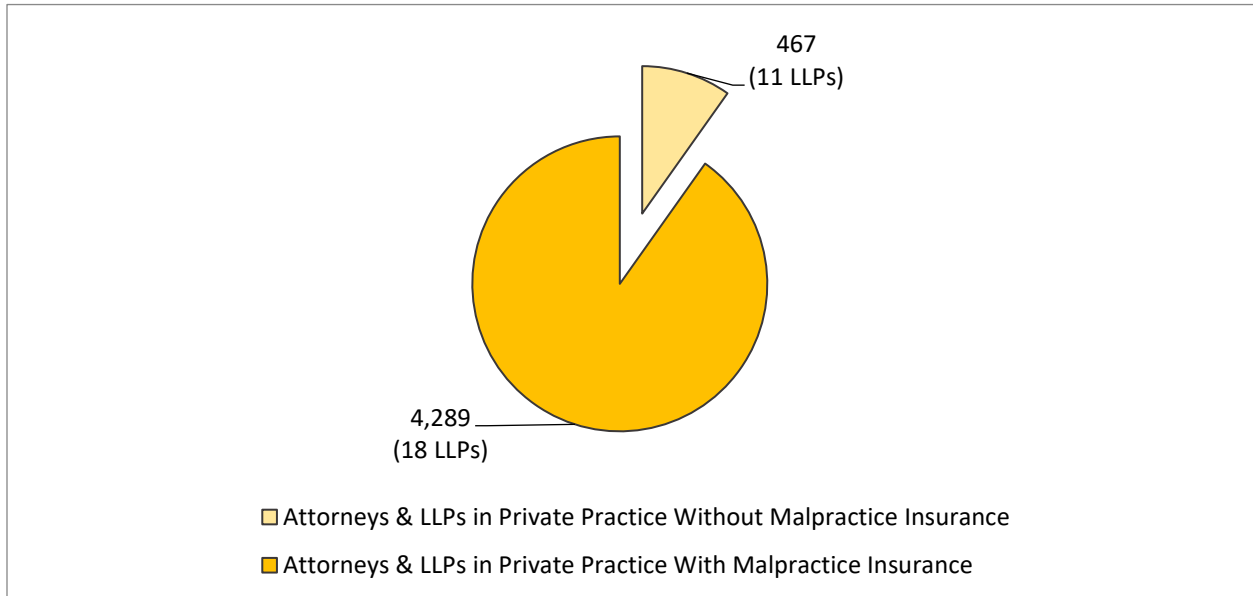
### CHART C-8: ACTIVE PRIVATE ATTORNEYS AND LLPS LARGE FIRM WITH/WITHOUT MALPRACTICE INSURANCE



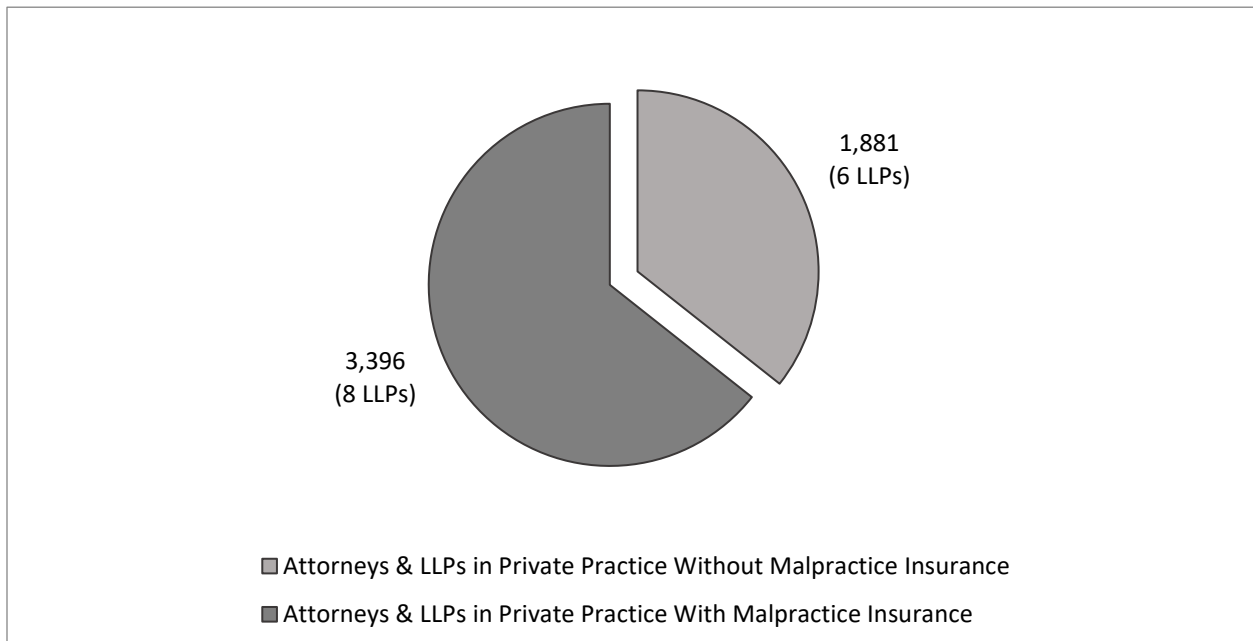
### CHART C-9: ACTIVE PRIVATE ATTORNEYS AND LLPS MEDIUM FIRM WITH/WITHOUT MALPRACTICE INSURANCE



### CHART C-10: ACTIVE PRIVATE ATTORNEYS AND LLPS SMALL FIRM WITH/WITHOUT MALPRACTICE INSURANCE



### CHART C-11: ACTIVE PRIVATE ATTORNEYS AND LLPS SOLO PRACTITIONER WITH/WITHOUT MALPRACTICE INSURANCE



## APPENDIX D:

### INTAKE AND INVESTIGATION STATISTICS

**TABLE D-1: Complaints Filed**

Year	Complaints Filed	Percent Change From Prior Year
2025	4,624	4.4%
2024	4,431	(0.9%)
2023	4,469	19.5%
2022	3,740	(2%)
2021	3,816	11.4%
2020	3,424	.7%
2019	3,400	(5.2%)
2018	3,586	3.1%

**TABLE D-2: Complaint Calls Received**

Year	Intake Complaint Calls	Additional Intake Calls
2025	4,624	6,127
2024	4,431	6,601
2023	3,469	5,982
2022	3,740	5,898
2021	3,816	6,327
2020	3,424	4,395
2019	3,400	5,177
2018	3,586	5,017

Regulation Counsel (or Deputy Regulation Counsel) reviews all offers of diversion made by the central intake attorneys. Additionally, at the request of either the complainant or the respondent-attorney, Regulation Counsel or Deputy Regulation Counsel reviews any determination made by a central intake attorney.

One of the goals of central intake is to handle complaints as quickly and efficiently as possible. In 1998, prior to central intake, the average time that matters spent at the preliminary investigation stage was 13 weeks. In 2025, the average time that matters spent at the intake stage was 5.3 weeks.

**TABLE D-3: Average Processing Time in Intake**

Average Time (weeks)	
2025	5.3
2024	5.72
2023	4.78
2022	4.73
2021	4.96
2020	5.73
2019	6.33
2018	6.55

Critical to the evaluation of central intake is the number of matters processed for further investigation versus the number of cases processed for investigation prior to implementation of central intake. In 2025, central intake handled 4,624 complaints; 210 of those cases were processed for further investigation. *See Table D-4.*

**TABLE D-4: Number of Cases Processed for Further Investigation**

Year	Investigations Initiated	% Change From Prior Year
2025	210	2.4%
2024	205	(12.4%)
2023	234	(6.4%)
2022	250	(5.7%)
2021	265	10.9%
2020	239	(13%)
2019	276	4.2%
2018	265	4.3%

In conjunction with central intake, cases that are determined to warrant no more than a public censure in discipline may be eligible for a diversion program. *See* C.R.C.P. 242.17. A diversion agreement is an alternative to discipline. Diversion agreements are useful in less serious matters in which an attorney must comply with certain conditions, which may include mediation, fee arbitration, law office management assistance, evaluation and treatment through the attorneys' peer assistance program, evaluation and treatment for substance abuse, psychological evaluation and treatment, medical evaluation and treatment, monitoring of the attorney's practice or accounting procedures, continuing legal education, ethics school, the multistate professional responsibility examination, or any other program authorized by the Court.

Participation in diversion is always voluntary and may involve informal resolution of minor misconduct by referral to Ethics School and/or Trust Account School, fee arbitration, an educational program, or an attorney-assistance program. If the attorney successfully completes the diversion agreement, the file in the Office of Attorney Regulation Counsel is closed and treated as a dismissal. In 2025, at the central intake stage, 25 matters were resolved by diversion agreements. *See* Table D-5. (A representative summary of diversion agreements is published quarterly in *The Colorado Lawyer*.)

**TABLE D-5: Number of Intake Diversion Agreements**

Year	Central Intake Diversion Agreements
2025	25
2024	29
2023	36
2022	56
2021	29
2020	26
2019	31
2018	40

Matters docketed for further investigation are assigned to trial counsel within the Office of Attorney Regulation Counsel, and are summarized in Appendix F.

## **Dismissals with Educational Language**

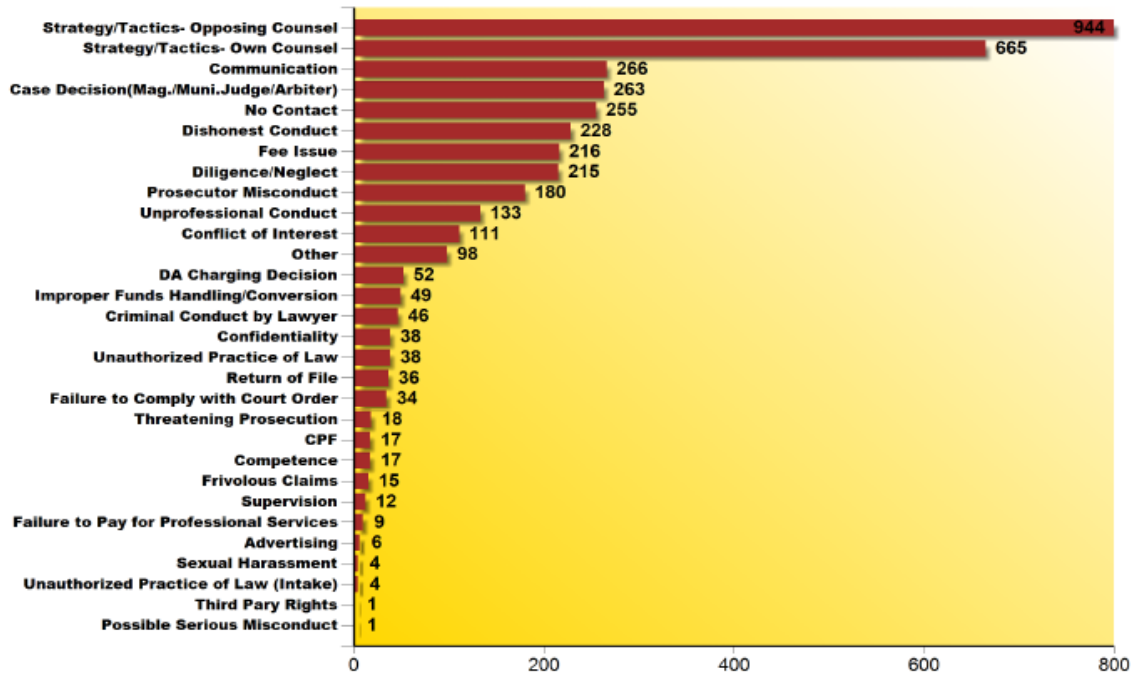
In October 2004, the Office of Attorney Regulation Counsel began tracking matters that are dismissed with educational and/or cautionary language. These dismissals can occur both at the intake stage and the investigative stage. One hundred twenty-one matters were dismissed with educational language either at the intake stage or the investigative stage in 2025. Some of the matters involve *de minimis* violations that would have been eligible for diversion. See Table D-6. Some other dismissals require attendance at Ethics School or Trust Account School.

**TABLE D-6: Intake & Investigation Dismissals with Educational Language**

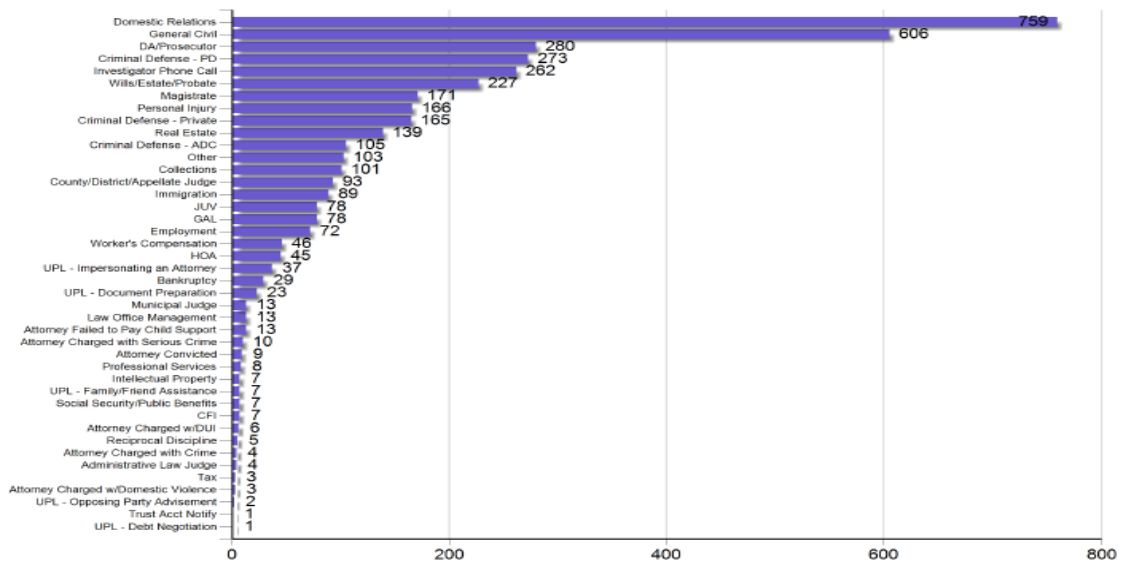
Year	Intake Stage	Investigative	Total
2025	93	28	121
2024	123	13	136
2023	114	27	141
2022	125	16	141
2021	159	30	189
2020	112	25	137
2019	128	19	157
2018	151	19	170

# APPENDIX E: CENTRAL INTAKE COMPLAINTS

## Chart E-1: Nature of Complaint



## Chart E-2: Complaint by Practice Area



## APPENDIX F:

### TRIAL DIVISION STATISTICS

Matters docketed for further investigation are assigned to trial counsel within the Office of Attorney Regulation Counsel. Investigation may lead to dismissal of the matter, diversion, a stipulation to discipline (also known as a conditional admission), or the filing of a formal complaint.

Trial counsel also investigates Unauthorized Practice of Law matters and Attorneys' Fund for Client Protection matters. Statistics relating to the unauthorized practice of law are covered under a separate heading in this report. The Attorneys' Fund for Client Protection report is filed separately.

**TABLE F-1: Investigation Statistics**

Year	Investigations Initiated	Dismissed by Regulation Counsel	To Presiding Disciplinary Judge	To Legal Regulation Committee	Reciprocal Disciplinary to Presiding Disciplinary Judge	Placed in Abeyance	Other	Pending
2025	210	72	20(31)*	54(77)*	8	16	0	153
2024	205	69	24(44)*	91(121)*	16	11	0	110
2023	234	73	4(6)*	71(118)*	4	19	0	160
2022	250	71	14(29)*	78(122)*	4	8	0	170
2021	265	124	29(46)*	72(102)*	11	7	0	141
2020	239	106	9(12)*	67(95)*	11	8(12)*	0	132
2019	276	125	12(16)*	89(146)*	14	14(22)*	0	149
2018	265	109	14(19)*	102(158)*	14	23(30)*	0	158

*\*The first number is actual files. The second number in parentheses represents the number of separate requests for investigation involved in the files.*

The following tables provide the average number of weeks from the time a matter is assigned to the trial division to the time it is either dismissed or another key event occurs, namely either a report for formal proceedings or a form of other resolution.

**Table F-2: Number of Weeks to Dismissal**

Number of Weeks from Case Assigned to Dismissal by Regulation Counsel/LRC	
2025	37.4
2024	35.3
2023	34.2
2022	24.4
2021	25.9
2020	24.8
2019	27.1
2018	25.9

**Table F-3: Number of Weeks to Other Interim or Final Resolution**

Number of Weeks from Case Assigned to Completion of Report/Diversion/Stipulation	
2025	37.8
2024	38.6
2023	37.6
2022	30.4
2021	26.4
2020	26.7
2019	26.6
2018	29

Attorney-respondents can choose to enter into a stipulation for designated discipline; proposed stipulations must be submitted to the Presiding Disciplinary Judge for approval. Table F-4 shows the number of attorneys entering into stipulations for discipline, with the number of separate requests for investigation covered by each stipulation in parentheses, before a formal complaint is filed with the Presiding Disciplinary Judge.

**Table F-4: Conditional Admissions at Investigative Stage**

Conditional Admissions at Investigative Stage Approved by the Presiding Disciplinary Judge	
2025	20(31)*
2024	24(44)*
2023	23(31)*
2022	14(29)*
2021	24(34)*
2020	22(31)*
2019	12(16)*
2018	14(17)*

*\*The first number represents actual files. The second number in parentheses represents the number of separate requests for investigation involved in the files.*

If the matter is not resolved through dismissal or a stipulation approved by the Presiding Disciplinary Judge, it is referred to the Legal Regulation Committee.

### **Legal Regulation Committee (LRC)**

The Legal Regulation Committee ended 2025 with twelve members, ten attorneys and two public members appointed by the Supreme Court with assistance from the Court's Advisory Committee. One of the Legal Regulation Committee's primary functions is to review investigations conducted by Regulation Counsel and determine whether there is reasonable cause to believe grounds for discipline exist. *See* C.R.C.P. 242.16. Following review of the investigation conducted by Regulation Counsel, the Legal Regulation Committee may dismiss the allegations, divert the matter to the alternatives to discipline program, order a private admonition be imposed, or authorize Regulation Counsel to file a formal complaint against the respondent-attorney.

In 2025, the Legal Regulation Committee reviewed 77 matters, some of which were asserted against the same respondent-attorney.<sup>39</sup> The LRC approved 15 diversion agreements. A diversion agreement is an alternative to discipline. As discussed elsewhere

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<sup>39</sup> Because some matters are carried over from one calendar year to the next, the number of matters reviewed by the Legal Regulation Committee and the number of matters dismissed by Regulation Counsel generally will not conform to the number of cases docketed or completed in the investigation area.

in this report, diversion agreements are useful in less serious matters in which an attorney must comply with certain conditions.

LRC also approved the commencement of formal proceedings in 27 cases, which result in either the filing of a formal complaint or a proposed stipulation to discipline with the Presiding Disciplinary Judge.

LRC also approved the issuance of 11 private admonitions against attorneys, which constitute discipline of record but are not known to the public.

LRC also reviews requests by complainants for review of Attorney Regulation Counsel's dismissal of matters. It also approves placing matters into abeyance when certain circumstances warrant that status of a case.

The following table summarizes the work of the LRC, which also includes the work of the Attorney Regulation Committee before that Committee was merged into the LRC.

**TABLE F-5: Dispositions by the Legal Regulation Committee<sup>40</sup>**

Year	Formal Proceedings	Diversion Matters	Private Admonition	Placed in Abeyance	Dismissals	Total Cases Acted Upon By LRC
2025	27(43)*	15(17)*	11(14)*	0	1(3)	54(77)*
2024	45(72)*	35(36)*	11(13)*	11	0	91(121)*
2023	35(67)*	19(32)*	17	19	0	71(118)*
2022	40(77)*	21(24)*	9	8	0	74(110)*
2021	34(56)*	23(30)*	12(13)*	7	1	70(100)*
2020	40(77)*	31(47)*	15(16)*	-	0	86(140)*
2019	37(79)*	42(57)*	8	-	0	87(144)*
2018	39(74)*	31(47)*	6(7)*	-	0	76(128)*

*\*Where there are two numbers reported, the first number is actual files; the second number in parentheses represents the number of separate requests for investigation involved in the files.*

<sup>40</sup> Some of these cases involved multiple reports of investigation of one attorney.

## **Review of Regulation Counsel Dismissals**

After a matter has been referred to the Trial Division for an investigation, a complainant may appeal Regulation Counsel’s determination to dismiss the matter to the full Legal Regulation Committee. If review is requested, the Legal Regulation Committee must review the matter and make a determination as to whether Regulation Counsel’s determination was an abuse of discretion. *See* C.R.C.P. 242.15(b); *see* Table F-6.

**TABLE F-6: Requests for Review**

Year	Number of Review Requests	Regulation Counsel Sustained	Regulation Counsel Reversed
2025	1	1	0
2024	2	2	0
2023	0	0	0
2022	3	3	0
2021	0	0	0
2020	3	3	0
2019	0	0	0
2018	1	1	0

## **Formal Complaints**

In 2025, in 43 matters, the Legal Regulation Committee found reasonable cause and authorized the Office of Attorney Regulation Counsel to file a formal complaint. *See* C.R.C.P. 242.16(a)(1). Several matters were consolidated, and including some matters authorized to go formal in 2024, the number of formal complaints filed in 2025 was 33. Eight reciprocal disciplinary matters—which are based on another jurisdiction’s discipline of a Colorado-licensed attorney, but do not require LRC review—also were filed with the Presiding Disciplinary Judge.

In certain cases, after authority to file a formal complaint is obtained, Attorney Regulation Counsel and Respondent enter into a conditional admission to be filed with the Presiding Disciplinary Judge without the filing of a formal complaint. *See* Table F-7.

**TABLE F-7: Formal Proceedings**

Year	Formal Complaints Filed	Stipulations Prior to Complaint Filed
2025	33(67)*	3(5)*
2024	31(63)*	6(8)*
2023	26(58)*	12(16)*
2022	29(64)*	12(22)*
2021	27(37)*	11(12)*
2020	23(58)*	8(15)*
2019	23(53)*	8(22)*
2018	36(64)*	8(17)*

\*The first number is actual files. The second number in parentheses represents the number of separate requests for investigation involved in the files.

The formal complaints filed, and those pending from 2024, in the attorney discipline area resulted in two disciplinary trials, four sanctions hearings, and two reinstatement hearings. The trial division handled one character and fitness hearing, and no unauthorized practice of law hearings. The trial division also participated in additional matters before the Presiding Disciplinary Judge (at issue conferences, status conferences, and pretrial conferences). The procedural summary of the matters after presentation to the Legal Regulation Committee is detailed in the following table. See Table F-8.

**TABLE F-8: Procedural Results of Matters at Trial Stage**

Year	Attorney Discipline Trials	Conditional Admissions	Dismissals**	Abeyance
2025	6	19(34)*	1	0
2024	6	24(53)*	0	0
2023	5	20(35)*	0	0
2022	5	18(32)*	0	0
2021	4	20(45)*	4(7)*	0
2020	7	19(52)*	0	0
2019	7	15(28)*	3	0
2018	5	20(42)*	3	0

\*Where there are two numbers reported, the first number represents actual files; the second number in parentheses represents the number of separate requests for investigation involved in the files.

\*\*This column includes dismissals on the Motion of the People.

After a formal complaint is filed with the Presiding Disciplinary Judge, the matter may be resolved by dismissal, diversion, conditional admission (stipulation) of misconduct, or by trial. The following tables compare the length of time formal complaints are pending before Presiding Disciplinary Judge. Additionally, a comparison of the time period from the filing of the formal complaint until a conditional admission of misconduct is filed, and a comparison of the time period from the filing of the formal complaint to trial, is provided.

**TABLE F-9: Average Time – Formal Complaint to Conditional Admission**

Year	Average Weeks from Filing of Formal Complaint to Conditional Admission	
2025	Presiding Disciplinary Judge	24.2 weeks
2024	Presiding Disciplinary Judge	24.4 weeks
2023	Presiding Disciplinary Judge	21.1 weeks
2022	Presiding Disciplinary Judge	24.8 weeks
2021	Presiding Disciplinary Judge	23.3 weeks
2020	Presiding Disciplinary Judge	17 weeks
2019	Presiding Disciplinary Judge	26.6 weeks
2018	Presiding Disciplinary Judge	27.3 weeks

**TABLE F-10: Average Time – Formal Complaint to Trial**

Year	Average Weeks from Filing of Formal Complaint to Trial	
2025	Presiding Disciplinary Judge	27.3 weeks
2024	Presiding Disciplinary Judge	26.9 weeks
2023	Presiding Disciplinary Judge	35.7 weeks
2022	Presiding Disciplinary Judge	28.5 weeks
2021	Presiding Disciplinary Judge	31.4 weeks
2020	Presiding Disciplinary Judge	42.4 weeks
2019	Presiding Disciplinary Judge	34.3 weeks
2018	Presiding Disciplinary Judge	27.7 weeks

Another comparison is the average time it takes from the filing of the formal complaint with the Presiding Disciplinary Judge until the Presiding Disciplinary Judge issues a final order.

After a trial, the hearing board generally issues an opinion within eight weeks. Additional time is needed to issue a final order, often to give an attorney time to wind up their practice.

**TABLE F-11: Average Weeks from the Filing of the Formal Complaint until the Final Order is issued by the Presiding Disciplinary Judge**

Year	Matter Resolved Through Conditional Admission or Diversion	Matter Resolved Through Trial
2025	33.7 weeks	36.8 weeks
2024	27.5 weeks	46.8 weeks
2023	23.2 weeks	62.9 weeks <sup>41</sup>
2022	28.1 weeks	33.1 weeks
2021	24.4 weeks	40 weeks
2020	14.2 weeks	53.6 weeks
2019	29.6 weeks	34.6 weeks
2018	33.5 weeks	35.3 weeks

<sup>41</sup> Three cases increased the duration for various reasons a year and a half or longer. The average number is 36.6 weeks without the three cases included.

## Appendix G:

### APPEALS

In 2025, four attorney discipline appeals were filed with the Court.

**TABLE G-1: Appeals Filed with the Colorado Supreme Court**

Year	Appeal Filed With:	Number of Appeals
2025	Colorado Supreme Court	4
2024	Colorado Supreme Court	4
2023	Colorado Supreme Court	6
2022	Colorado Supreme Court	6
2021	Colorado Supreme Court	2
2020	Colorado Supreme Court	5
2019	Colorado Supreme Court	6
2018	Colorado Supreme Court	6

**TABLE G-2: Disposition of Appeals as of December 31, 2025**

Year	Appeals Filed	Appeals Dismissed	Appeals Affirmed	Appeals Reversed	Appeals Pending
2025	4	1	6	0	0
2024	4	0	6	0	3
2023	6	2	1	0	5
2022	6	1	5	0	2
2021	2	0	3	0	2
2020	5	0	5	0	3
2019	6	0	3	0	3
2018	6	1	3	0	2

*(Matters filed in the previous calendar year may be carried over to the next calendar year.)*

## APPENDIX H: FINAL DISPOSITIONS

Final dispositions resulting in public discipline, including discipline stipulated to in conditional admissions, are reflected in Table H-1.

**TABLE H-1: Final Dispositions of Formal Proceedings**

Year	Abeyance	Dismissals <sup>42</sup>	Diversions	Public Censures	Suspensions	Probations	Disbarments
2025	0	1	1	9(11)*	38(69)*	21(35)*	5(16)*
2024	0	0	1	12(18)*	39(74)*	21(36)*	10(23)*
2023	0	1	1	15(16)*	34(52)*	13(16)*	13(37)*
2022	0	1	1(2)*	6	31(58)*	13(28)*	5(15)*
2021	0	4(7)*	1	6(8)*	45(75)*	21(36)*	5(9)*
2020	0	0	0	9(11)*	35(79)*	20(33)*	8(19)*
2019	0	3	1	16(17)*	35(39)*	18(22)*	14(25)*
2018	0	3	3	10(11)*	38(74)*	23(46)*	10(23)*

*\*When there are two numbers reported, the first number represents actual files; the second number in parentheses represents the number of separate requests for investigation involved in the files.*

<sup>42</sup> This column includes dismissals on the Motion of the People.

## APPENDIX I: OTHER ACTIONS

### Interim Suspensions

In 2025, the Office of Attorney Regulation Counsel filed four petitions for attorney interim suspension.<sup>43</sup> These were based on four felony convictions, one for failure to cooperate in the disciplinary process and one was denied for attorney interim suspension.

The petitions are filed directly with the Presiding Disciplinary Judge or the Colorado Supreme Court. The respondent-attorney may request a prompt hearing if the Supreme Court enters an order to show cause. Dispositions of the interim suspension petitions are reflected in Table I-1.

**TABLE I-1: Dispositions of Interim Suspensions**

Year	Filed	Suspended	Suspended (Child Support)	Suspended (Failure to Cooperate)	Felony Conviction (Conversion)	Reinstated	Withdrawn	Discharged/ Denied/ Dismissed	Pending
2025	5	4	0	1	4	0	0	1	0
2024	4	4	0	2	2	0	0	0	0
2023	7	5	0	1	4	0	1	1	0
2022	5	5	0	1	4	0	0	0	0
2021	7	7	1	1	5*	0	0	0	0
2020	7	6	0	2	4*	0	0	1	0
2019	8	6	0	1	7	0	0	1	1
2018	11	9	0	1	6	0	3	1	0

*\*This includes an immediate suspension for an immediate threat to the effective administration of justice. (Matters filed in the previous calendar year may be carried over to the next calendar year.)*

<sup>43</sup> Interim suspension is the temporary suspension by the Supreme Court of an attorney's license to practice law and can be sought when an attorney has converted property or funds, the attorney has engaged in conduct that poses an immediate threat to the administration of justice, or the attorney has been convicted of a serious crime. See C.R.C.P. 242.22. Additionally, under C.R.C.P. 242.23, a petition for non-disciplinary suspension for noncompliance in child support and paternity proceedings may be filed if an attorney is not in noncompliance with a child support order or a paternity/child support proceeding. C.R.C.P. 242.24 also authorizes suspension of an attorney for failure to cooperate with Regulation Counsel.

## **Disability Matters**

The Office of Attorney Regulation Counsel filed eight petitions/stipulations to transfer attorneys to disability inactive status in 2025. When an attorney is unable to fulfill the attorney's professional responsibilities because of physical, mental, or emotional illness, disability proceedings are initiated. These proceedings, including hearings, are confidential although a final order placing an attorney on disability inactive status is public. An attorney who has been transferred to disability inactive status may file a petition for reinstatement with the Presiding Disciplinary Judge. *See* Table I-2.

**TABLE I-2: Disposition of Disability Matters**

Year	Filed	Disability Inactive Status	Dismissed/ Discharged / Denied	Reinstated	Withdrawn	Pending
2025	8	8	0	0	0	0
2024	10	9	0	0	0	1
2023	3	3	0	0	0	0
2022	7	6	1	0	0	0
2021	11	11	0	0	0	0
2020	9	8	1	0	0	0
2019	11	9	2	0	0	0
2018	12	12	0	0	0	0

*(Matters filed in the previous calendar year may be carried over to the next calendar year.)*

## **Contempt Proceedings**

The Office of Attorney Regulation Counsel filed no motion recommending contempt with the Supreme Court in 2025. Contempt proceedings are filed when practicing law while under suspension or disbarment. *See* Table I-3.

**TABLE I-3: Disposition of Contempt Matters**

Year	Motions for Contempt	Held in Contempt	Discharged\ Dismissed	Withdrawn	Pending
2025	0	0	0	0	0
2024	0	0	0	0	0
2023	0	0	0	0	0
2022	0	0	0	0	0
2021	1	2	0	0	0
2020	1	0	0	0	1
2019	1	1	0	0	0
2018	0	0	0	0	0

## **Magistrates**

Although the Commission on Judicial Discipline has jurisdiction over many state judges for judicial misconduct, the Office of Attorney Regulation Counsel is responsible for handling complaints against magistrates for judicial misconduct. *See the Colorado Rules for Magistrates, Rule 5(h)*. In the year 2025, the Office of Attorney Regulation Counsel received 180 complaints against magistrates. Of the 180 complaints, 175 were dismissed and five matters were pending at the end of 2025. *See Table I-4.*

**TABLE I-4: Disposition of Complaints Concerning Magistrates**

Year	Complaints	Dismissed	Diversion
2025	180	175	0
2024	143	142	0
2023	157	158	0
2022	128	127	0
2021	90	89	0
2020	75	74	0
2019	56	54	0
2018	58	55	0

## **Reinstatement and Readmission Matters**

In 2025, nine attorney reinstatement or readmission matters were filed with the Office of Presiding Disciplinary Judge. The attorney seeking reinstatement or readmission must provide a copy of the verified petition to Regulation Counsel. When an attorney has been suspended for at least one year and one day, has been disbarred, or the court's order requires reinstatement, they must seek reinstatement or apply for readmission to the Colorado Bar.<sup>44</sup>

**TABLE I-5: Disposition of Reinstatement / Readmission Matters**

Year	Filed	Readmitted	Reinstated	Dismissed	Withdrawn	Denied	Pending
2025	9	0	5	0	3	2	2
2024	8	0	6	0	1	1	3
2023	5	0	2	0	0	0	3
2022	4	0	5	1	0	3	0
2021	9	0	2	1	1	0	5
2020	1	0	1	0	0	0	0
2019	5	0	2	1	1	0	1
2018	2	0	4	0	0	0	0

*(Matters filed in the previous calendar year may be carried over to the next calendar year.)*

## **Trust Account Notification Matters**

All Colorado attorneys and LLPs in private practice must maintain a trust account in a financial institution doing business in Colorado. The financial institution must agree to report to Regulation Counsel any properly payable trust account instrument presented against insufficient funds, irrespective of whether the instrument is honored. The report by the financial institution must be made within five banking days of the date of presentation for payment against insufficient funds.

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<sup>44</sup> A disbarred attorney may seek readmission eight years after the effective date of the order of disbarment. The individual must retake and pass the Colorado Bar examination and demonstrate fitness to practice law. Any attorney suspended for a period of one year and one day or longer must file a petition for reinstatement with the Presiding Disciplinary Judge. In some matters, reinstatement proceedings are ordered when the suspension is less than one year and one day. See C.R.C.P. 242.39.

The reporting requirement is a critical aspect of the Attorneys' Fund for Client Protection. The rule is designed to operate as an "early warning" that an attorney or LLP may be engaging in conduct that might injure clients.

In 2025, the Office of Attorney Regulation Counsel received 93 notices of attorney trust account checks drawn on insufficient funds. Because of the potentially serious nature, the reports receive immediate attention from the Office of Attorney Regulation Counsel. An investigator or attorney is required to contact the attorney account holder and the financial institution making the report. A summary of the investigator's findings is then submitted to Regulation Counsel for review. If Regulation Counsel determines that there is reasonable cause to believe that a conversion of client funds occurred, the matter is immediately assigned to trial counsel. If there is no evidence of intentional misconduct or inappropriate accounting practices, the matter is dismissed by Regulation Counsel.

**TABLE I-6: Trust Account Notifications**

Year	Total Reports	Bank Errors	Bookkeeping/ Deposit Errors	Checks Cashed Prior To Deposit Clearing/ Improper Endorsement	Conversion/ Commingling Assigned to Trial Attorney	Diversion	Other <sup>45</sup>	Pending
2025	93	3	23	7	3	0	57	2
2024	117	5	20	13	14	0	65	2
2023	103	1	10	13	26	0	49	4
2022	85	1	18	7	2	1	57	2
2021	134	1	41	9	4	0	79	5
2020	91	1	18	7	14	0	47	4
2019	86	1	34	11	8	1	52	2
2018	173	4	46	26	13	2	73	9

<sup>45</sup> The category "Other" includes errors due to unanticipated credit card fees or charges, employee theft, forgery, stolen check or other criminal activity, check written on wrong account, charge back item (a fee charged to the law for a client's NSF check) and check or wire fee not anticipated.

## APPENDIX J:

### UNAUTHORIZED PRACTICE OF LAW

The Office of Attorney Regulation Counsel investigates and prosecutes allegations of the unauthorized practice of law by non-lawyers. In 2025, the Office of Attorney Regulation Counsel received 125 complaints regarding the unauthorized practice of law. *See* Table J-1. While some complaints did not proceed past the intake division’s review, others were processed to the trial division for investigation.

**TABLE J-1: Number of UPL Complaints Received**

Year	Number of Complaints
2025	125
2024	93
2023	85
2022	76
2021	75
2020	63
2019	70
2018	61

After an investigation, the Legal Regulation Committee may direct trial counsel to seek a civil injunction by filing a petition with the Supreme Court or, in the alternative, offer the respondent an opportunity to enter into a written agreement to refrain from the conduct in question, to refund any fees collected, and to make restitution. The Legal Regulation Committee considered 13 unauthorized practice of law matters in 2025. Additionally, trial counsel may institute contempt proceedings against a respondent that is engaged in the unauthorized practice of law. *See* C.R.C.P. 232.22 – 232.24.

In 2025, the Legal Regulation Committee approved thirteen unauthorized practice of law matters for investigation of formal injunctive or contempt proceedings and two unauthorized practice of law matters through a signed agreement with the Respondent to stop engaging in the unauthorized practices of law. Thirteen complaints were dismissed by Regulation Counsel. See Table J-2.

**TABLE J-2: UPL Practice of Law Dispositions**

Year	Filed	Dismissed by Regulation Counsel	Dismissed After Investigation by LRC	Abeance	Agreements	Formal (injunctive or contempt proceedings)
2025	125	13	0	0	2	13(15)*
2024	93	13	0	0	2	3
2023	85	3	0	0	0	3(4)*
2022	76	1	0	0	2	5
2021	75	7	0	1	4	3
2020	63	7	0	1	6	7
2019	70	14	0	0	5	10
2018	61	19	0	0	5	7

*\*When there are two numbers reported, the first number represents actual files; the second number in parentheses represents the number of separate requests for investigation involved in the files.*

*(Matters filed in the previous calendar year may be carried over to the next calendar year.)*

The following information regarding the investigation and prosecution of unauthorized practice of law matters is provided for informational purposes:

**INTAKE:** The Office of Attorney Regulation Counsel typically receives several general inquiries on unauthorized practice of law matters each week. Regulation Counsel uses these telephone inquiries as an opportunity to educate the lawyer, client, or non-lawyer-provider on the issues of what constitutes the unauthorized practice of law and possible harm that can result from the unauthorized practice of law. Regulation Counsel also discusses the fact that non-lawyers owe no duties of competence, diligence, loyalty, or truthfulness, and there may be fewer remedies as there is no system regulating the quality of such services, no client protection funds, and no errors and omissions insurance. Regulation Counsel discusses the potential issues involving types and levels of harm. Regulation Counsel encourages a caller to file a request for investigation if they believe the unauthorized practice of law has occurred rather than dissuade the caller from filing an unauthorized practice of law request for investigation.

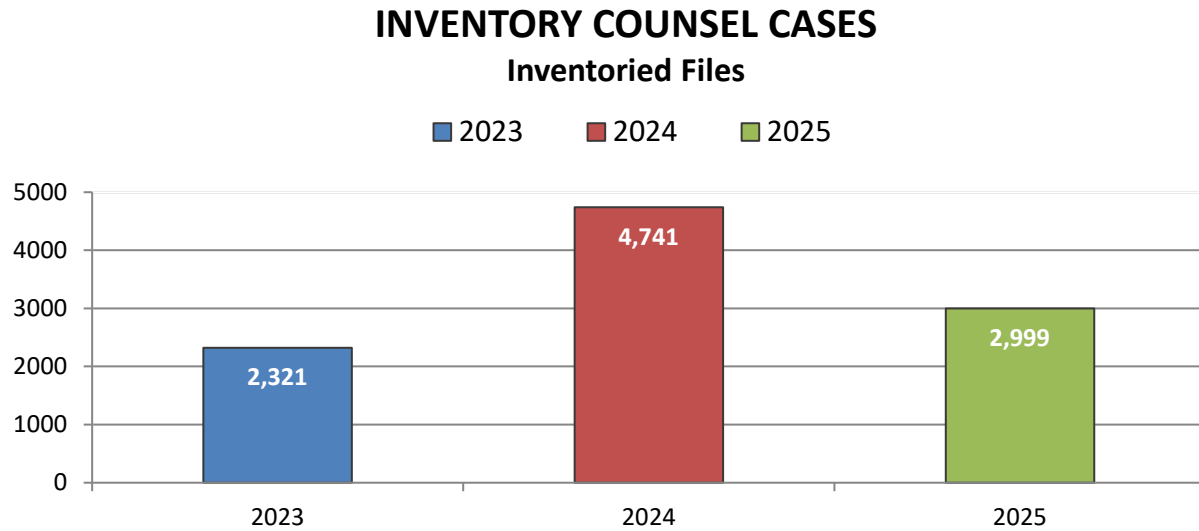
**INVESTIGATION:** The Office of Attorney Regulation Counsel uses the same investigation techniques in unauthorized practice of law matters that are used in attorney discipline matters. These techniques include interviewing the complaining witness, any third-party witnesses, and the respondent(s). Regulation Counsel orders relevant court files and other documents and frequently uses the power of subpoenas to determine the level and extent of the unauthorized practice. If the unauthorized practice of law has occurred, Regulation Counsel attempts to identify and resolve the unauthorized practice, as well as issues involving disgorgement of fees and restitution with an informal agreement. These investigations create further public awareness of what constitutes the unauthorized practice of law and this Office's willingness to address unauthorized practice of law issues.

**TRIAL:** Once matters are investigated and issues involving serious client harm or harm to the legal system are identified, Regulation Counsel pursues enforcement of the rules concerning the unauthorized practice of law. Injunctive proceedings are used to ensure that future misconduct does not occur. Federal and state district court (and state county court) judges have taken note of this and submit the names of the problematic non-lawyer respondents. As a result of unauthorized practice of law proceedings, numerous immigration consulting businesses have been shut down throughout Colorado. In addition, other individuals who either posed as lawyers to unwary clients, or who otherwise provided incompetent legal advice have been enjoined from such conduct. Some individuals have been found in contempt of prior Colorado Supreme Court orders of injunction.

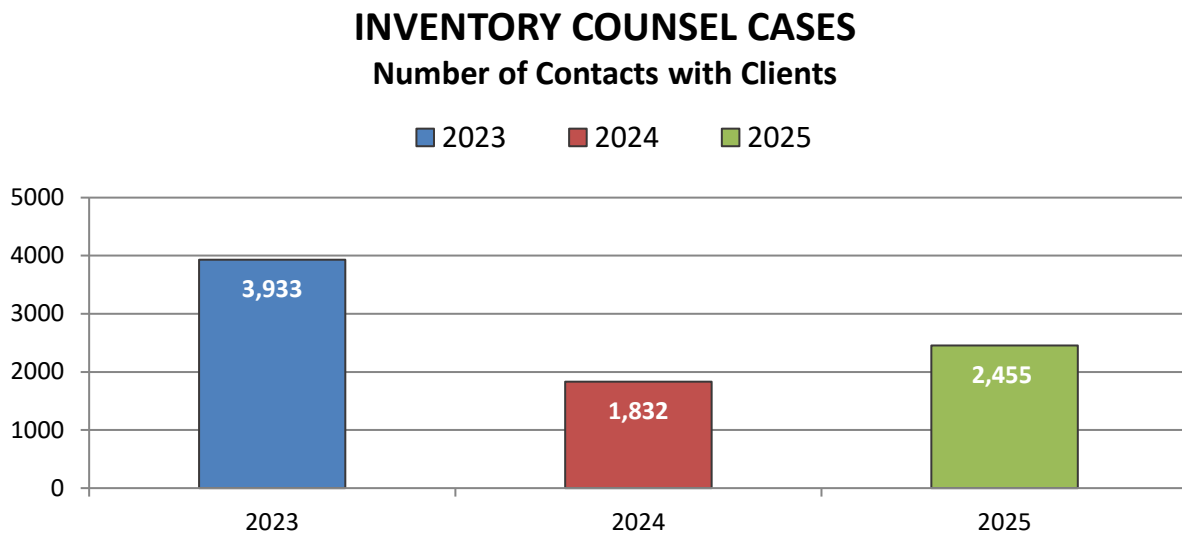
Regulation Counsel assigns trial counsel and non-attorney investigators to unauthorized practice of law matters.

## APPENDIX K: INVENTORY COUNSEL

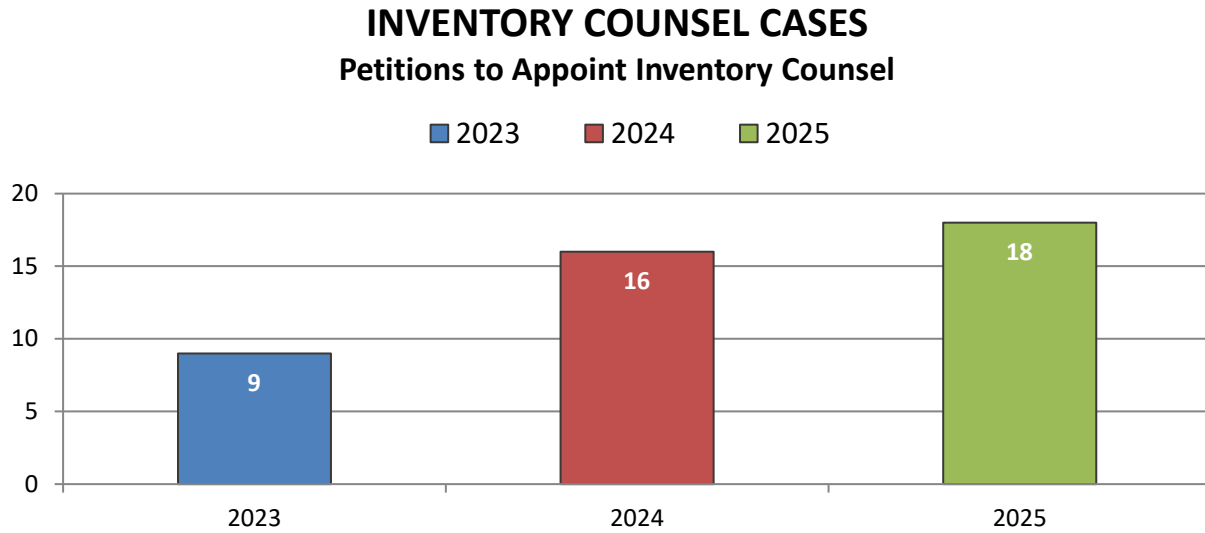
**Chart K-1: Inventory Counsel Files/Electronic Files Inventoried**



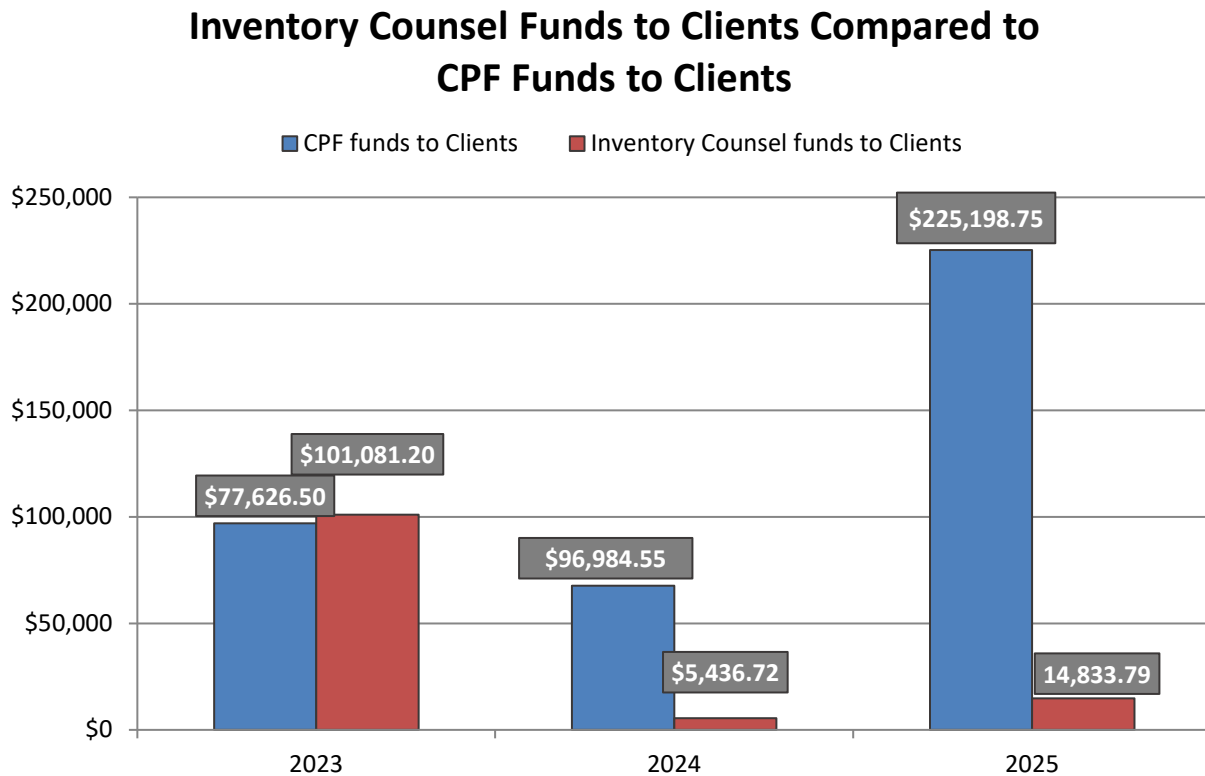
**Chart K-2: Inventory Counsel Number of Letters/Calls to Clients**



**Chart K-3: Petitions to Appoint Inventory Counsel**



**Chart K-4: Inventory Counsel Funds Returned to Clients**





**Colorado Supreme Court  
Office of Attorney Regulation Counsel  
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