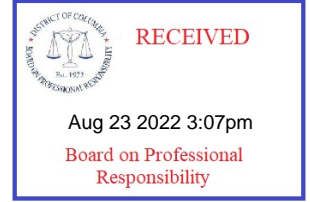


**DISTRICT OF COLUMBIA COURT OF APPEALS  
BOARD ON PROFESSIONAL RESPONSIBILITY**



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**In the Matter of** :

**Jehan A. Carter, Esquire** :

**A Member of the Bar of the** :  
**District of Columbia Court of Appeals.** :

**Bar Number: 1018067** :

**Date of Admission: January 10, 2014** :  
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**Disciplinary Docket No. 2022-D138**

**SPECIFICATION OF CHARGES**

The disciplinary proceedings instituted by this petition are based upon conduct that violates the standards governing the practice of law in the District of Columbia as prescribed by D.C. Bar R. X and XI, § 2(b).

1. Jurisdiction for this disciplinary proceeding is prescribed by D.C. Bar Rule XI. Pursuant to D.C. Bar R. XI, § 1(a), jurisdiction is found because Respondent is a member of the Bar of the District of Columbia Court of Appeals, having been admitted on January 10, 2014, and assigned Bar number 1018067.

2. On May 3, 2019, Dominique Collier filed a disciplinary complaint against Respondent with the Office of Disciplinary Counsel.

3. On August 23, 2021, Disciplinary Counsel filed a specification of charges against Respondent that charged her with misconduct in representing

Ms. Collier.

4. On September 10, 2021, Respondent was served with the petition and specification of charges.

5. On November 26, 2021, Respondent filed a civil action against Ms. Collier seeking attorney's fees, *Carter Law Group, PLLC v. Dominique Collier*, 2021 SC3 001266.

6. On November 26, 2021, in Superior Court case 2021 SC3 001266, Respondent stated under oath as part of her statement of claim, that "Collier was contacted by the Carter Law Group offices for payment and by a collection agency. Collier has ignored both and in fact in retaliation filed an unsubstantiated bar complaint..."

7. On February 17, 2022, *Carter Law Group, PLLC v. Dominique Collier*, 2021 SC3 001266 was dismissed for failure to effectuate service on Ms. Collier.

8. On April 14, 2022, Respondent filed a second civil action against Ms. Collier seeking attorney's fees, *Carter Law Group, PLLC v. Dominique Collier*, 2022 SC3 000425.

9. On April 14, 2022, in Superior Court case 2022 SC3 000425, Respondent stated under oath in her statement of claim that "Defendant instead of making payment filed a Bar complaint that was later dismissed because it was unsubstantiated."

10. Respondent knew this was not true as she knew she had been charged with misconduct in Ms. Collier's matter and had admitted to the charges as part of a petition for negotiated discipline.

11. Respondent's conduct violated the following District of Columbia Rules of Professional Conduct:

- a. Rule 3.3(a)(1) in that Respondent made a false statement of fact or law to a tribunal;
- b. Rule 8.4(c) in that Respondent engaged in conduct involving dishonesty and misrepresentation;
- c. Rule 8.4(d), in that Respondent engaged in conduct that seriously interfered with the administration of justice.

Respectfully submitted,

*Hamilton P. Fox, III*

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Hamilton P. Fox, III  
Disciplinary Counsel

*Caroll G. Donayre*

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Caroll G. Donayre  
Assistant Disciplinary Counsel

OFFICE OF DISCIPLINARY COUNSEL  
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(202) 638-1501

**VERIFICATION**

I declare under penalty of perjury under the laws of the United States of America that I verily believe the facts stated in the Specification of Charges to be true and correct.

Executed on this 16<sup>th</sup> day of August 2022.

*Caroll G. Donayre*  
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Caroll G. Donayre  
Assistant Disciplinary Counsel



(1) **Referral to Hearing Committee** – When the Board receives the Petition Instituting Formal Disciplinary Proceedings, the Board shall refer it to a Hearing Committee.

(2) **Filing Answer** – Respondent must respond to the Specification of Charges by filing an answer with the Board and by serving a copy on the Office of Disciplinary Counsel within 20 days of the date of service of this Petition, unless the time is extended by the Chair of the Hearing Committee. Permission to file an answer after the 20-day period may be granted by the Chair of the Hearing Committee if the failure to file an answer was attributable to mistake, inadvertence, surprise, or excusable neglect. If a limiting date occurs on a Saturday, Sunday, or official holiday in the District of Columbia, the time for submission will be extended to the next business day. Any motion to extend the time to file an answer, and/or any other motion filed with the Board or Hearing Committee Chair, must be served on the Office of Disciplinary Counsel at the address shown on the last page of this petition.

(3) **Content of Answer** – The answer may be a denial, a statement in exculpation, or a statement in mitigation of the alleged misconduct. Any charges not answered by Respondent may be deemed established as provided in Board Rule 7.7.

(4) **Mitigation** – Respondent has the right to present evidence in mitigation to the Hearing Committee regardless of whether the substantive allegations of the Specification of Charges are admitted or denied.

(5) **Process** – Respondent is entitled to fifteen days’ notice of the time and place of hearing, to be represented by counsel, to cross-examine witnesses, and to present evidence.

E. In addition to the procedures contained in D.C. Bar R. XI, the Board has promulgated Board Rules relating to procedures and the admission of evidence which are applicable to these procedures. A copy of these rules is being provided to Respondent with a copy of this Petition.

**WHEREFORE**, the Office of Disciplinary Counsel requests that the Board consider whether the conduct of Respondent violated the District of Columbia Rules of Professional Conduct, and, if so, that it impose/recommend appropriate discipline.

*Hamilton P. Fox, III*

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Hamilton P. Fox, III  
Disciplinary Counsel

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