

**State of Michigan  
Attorney Discipline Board**

FILED  
ATTORNEY DISCIPLINE BOARD  
17 APR 13 PM 3:44

**Grievance Administrator,  
Michigan Attorney Grievance Commission,**

Petitioner,

**Case No. 17-37-GA**

v

**Leigh Zalewski Ebrom, P66266,**

Respondent.

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**Formal Complaint**

**(Parties and Jurisdiction)**

1. Petitioner, Grievance Administrator, is authorized by MCR 9.109(B)(6) to prosecute this Formal Complaint by the Attorney Grievance Commission, which is the prosecution arm of the Supreme Court for the discharge of its constitutional responsibility to supervise and discipline Michigan attorneys.

2. As a licensed Michigan attorney, Respondent is subject to the jurisdiction of the Supreme Court and the Attorney Discipline Board as set forth in MCR 9.104.

3. Michigan attorneys have a duty to conduct themselves personally and professionally at all times in conformity with the standards imposed on members of the bar as a condition of the privilege to practice law.

4. Respondent is a Michigan attorney who was licensed in 2003 and who resides or has her place of business in the County of Ottawa.

**Count One**

**(Factual Allegations)**

5. In 2007, Respondent was retained by Adela Foltice to represent her in a premises liability matter against Meijer.

6. Respondent filed a lawsuit on Ms. Foltice's behalf on July 2, 2009, after the statute of limitations had expired.

7. Respondent did not advise Ms. Foltice that she had not timely filed the matter.

8. After Meijer was served with the complaint, counsel for Meijer filed a motion for summary disposition alleging that the case should be dismissed as being untimely filed.

9. Respondent stipulated to the dismissal of the lawsuit.

10. On September 15, 2009, Ms. Foltice's case was dismissed.

11. Respondent did not advise Ms. Foltice that her matter had been dismissed.

12. From 2011 until 2016, Respondent misled Ms. Foltice regarding the status of her matter.

13. In multiple e-mails during that time period, Respondent advised Ms. Foltice that discovery was almost complete, that she believed Ms. Foltice could obtain a reasonable settlement, that she was working on the matter, and that the case was important to her.

14. Respondent's statements were false, and she knew or should have known that her statements were false, as Ms. Foltice's complaint had been dismissed in 2009.

15. On April 26, 2016, Ms. Foltice met with attorneys Chris Rabideau and Robert Chessman from Respondent's firm.

16. At that time, they advised Ms. Foltice that Respondent had improperly handled her claim, that she failed to timely file her lawsuit, and that the firm would take no further action to

pursue a claim against Meijer because the statute of limitations had expired on July 1, 2009.

**(Grounds for Discipline)**

17. By reason of the conduct described above in Count One of this Complaint, Respondent has engaged in the following misconduct:

- a) neglected a legal matter, in violation of MRPC 1.1(c);
- b) failed to seek the lawful objectives of the client, in violation of MRPC 1.2(a);
- c) failed to act with reasonable diligence and promptness, in violation of MRPC 1.3;
- d) failed to keep a client reasonably informed about the status of a matter, in violation of MRPC 1.4(a);
- e) engaged in conduct in violation of the Rules of Professional Conduct, in violation of MRPC 8.4(a) and MCR 9.104(4);
- f) engaged in conduct involving dishonesty, fraud, deceit, misrepresentation, or violation of a criminal law, where such conduct reflects adversely on the lawyer's honesty, trustworthiness, or fitness as a lawyer, in violation of MRPC 8.4(b);
- g) engaged in conduct that is prejudicial to the

administration of justice, in violation of MRPC 8.4(c) and MCR 9.104(1);

- h) engaged in conduct that exposes the legal profession or the courts to obloquy, contempt, censure, or reproach, in violation of MCR 9.104(2); and,
- i) engaged in conduct that is contrary to justice, ethics, honesty, or good morals, in violation of MCR 9.104(3).

**Count Two**  
**(Factual Allegations)**

18. In 2009, Respondent was retained by Beverly Honeysette Carlson to represent her in a no-fault matter.

19. Respondent did not file a no fault claim on Ms. Honeysette Carlson's behalf.

20. Respondent misled Ms. Honeysette Carlson about the status of her matter, advising her that she had filed a no-fault complaint and providing her with a copy of a complaint, when she had not done so.

21. Respondent's statements to Ms. Honeysette Carlson were false, and she knew or should have known that they were false, as she never filed a no-fault complaint on Ms. Honeysette Carlson's behalf.

22. Ms. Honeysette Carlson left voicemail messages for Respondent from February of 2014 through August of 2015 to which Respondent did not respond.

**(Grounds for Discipline)**

23. By reason of the conduct described in Count Two of this Complaint, Respondent has engaged in the following misconduct:

- a) neglected a legal matter, in violation of MRPC 1.1(c);
- b) failed to seek the lawful objectives of the client, in violation of MRPC 1.2(a);
- c) failed to act with reasonable diligence and promptness, in violation of MRPC 1.3;
- d) failed to keep a client reasonably informed about the status of a matter, in violation of MRPC 1.4(a);
- e) engaged in conduct in violation of the Rules of Professional Conduct, in violation of MRPC 8.4(a) and MCR 9.104(4);
- f) engaged in conduct involving dishonesty, fraud, deceit, misrepresentation, or violation of a criminal law, where such conduct reflects adversely on the lawyer's honesty, trustworthiness, or fitness as a lawyer, in violation of MRPC 8.4(b);
- g) engaged in conduct that is prejudicial to the administration of justice, in violation of MRPC

8.4(c) and MCR 9.104(1);

- h) engaged in conduct that exposes the legal profession or the courts to obloquy, contempt, censure, or reproach, in violation of MCR 9.104(2); and,
- i) engaged in conduct that is contrary to justice, ethics, honesty, or good morals, in violation of MCR 9.104(3).

Wherefore, Respondent should be subjected to such discipline as may be warranted by the facts and circumstances of such misconduct.

Dated: April 13, 2017



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