

SUPREME COURT OF NEW JERSEY
DISCIPLINARY REVIEW BOARD
Docket No. 25-056
District Docket No. VB-2023-0001E

In the Matter of Brittany L. Parisi
An Attorney at Law

Decided
August 13, 2025

Certification of the Record

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Introduction

To the Honorable Chief Justice and Associate Justices of the Supreme Court of New Jersey.

This matter was before us on a certification of the record filed by the District VB Ethics Committee (the DEC), pursuant to R. 1:20-4(f). The formal ethics complaint charged respondent with having violated RPC 8.1(b) (two instances – failing to cooperate with disciplinary authorities).¹

For the reasons set forth below, we determine that a censure is the appropriate quantum of discipline for respondent's misconduct.

Ethics History

Respondent earned admission to the New Jersey bar in 2020. During the relevant timeframe, she maintained a practice of law in Short Hills and Matawan, New Jersey. She has prior discipline and Court interaction in New Jersey.

¹ Due to respondent's failure to file an answer to the formal ethics complaint, and on notice to her, the DEC amended the complaint to include the second RPC 8.1(b) charge.

Temporary Suspensions

Between December 2023 and April 2025, the Court issued seven Orders temporarily suspending respondent from the practice of law.

Specifically, effective December 8, 2023, the Court temporarily suspended respondent for her failure to comply with two disciplinary investigations conducted by the Office of Attorney Ethics (the OAE). In re Parisi, 256 N.J. 87 (2023).

Eight months later, on August 13, 2024, the Court issued two Orders temporarily suspending respondent, effective September 12, 2024, for her failure to comply with fee arbitration determinations in two client matters. In re Parisi, 258 N.J. 441 (2024), and In re Parisi, 258 N.J. 442 (2024).

Thereafter, on April 14, 2025, the Court issued four Orders temporarily suspending respondent, effective May 14, 2025, for her failure to comply with fee arbitration determinations in four more client matters. In re Parisi, ___ N.J. ___ (2025) (District Docket No. IX-2023-0037F, DRB 24-252); In re Parisi, 260 N.J. 358 (2025); In re Parisi, 260 N.J. 360 (2025); and In re Parisi, 260 N.J. 361 (2025).

To date, respondent remains temporarily suspended pursuant to all seven Orders.

Parisi I

On July 1, 2025, in a default matter, the Court reprimanded respondent for having violated RPC 8.1(b) (two instances) and RPC 8.4(d) (engaging in conduct prejudicial to the administration of justice). In re Parisi, ___ N.J. ___ (2025), 2025 N.J. LEXIS 635 (Parisi I). In that matter, respondent failed to file the required R. 1:20-20 affidavit following the Court's December 8, 2023 Order temporarily suspending her from the practice of law.

Parisi II

On April 10, 2025, in another default matter, we issued a decision recommending that respondent be disbarred for her misconduct across six disciplinary matters that had been consolidated by the OAE for the imposition of discipline. In the Matter of Brittany L. Parisi, DRB 25-010 (April 10, 2025) (Parisi II).

In one matter comprising Parisi II, we concluded that respondent had knowingly misappropriated funds from the law firm where she had been employed as an associate, in violation of RPC 1.15(a) and the principles of In re Wilson, 81 N.J. 451 (1979), and In re Siegel, 133 N.J. 162 (1993). Id. at 38, 41. Specifically, in 2021, respondent instructed one client to pay a legal fee directly to her, rather than to the firm and, following her receipt of those funds, failed to

perform the promised legal services. In January 2022, upon discovery of her theft, the managing partner terminated her employment. Id. at 10, 42. The managing partner's subsequent review of respondent's e-mail records revealed that, in November and December 2021, she had knowingly misappropriated law firm funds a second time by accepting a legal fee directly from a client whom respondent had concealed from the firm. Id. at 12.

In February 2022, following her termination from the law firm, respondent opened her own law practice. Id. at 13. Thereafter, in connection with several client matters, she accepted legal fees from family law clients, performed no meaningful work on their behalf, and failed to refund her unearned fees. Id. at 63. Rather, she lied to one client, promising that she would issue a refund, and, in another matter, failed to fulfill her commitment to the OAE to issue a refund, despite the passage of more than thirty months since the client first requested a refund. Ibid. Respondent also committed numerous recordkeeping infractions. Id. at 28-29.

Compounding her misconduct, respondent failed, despite numerous opportunities, to cooperate with the OAE's multiple disciplinary investigations, which spanned from approximately December 2022 to October 8, 2024 (the date of the formal ethics complaint). She also failed to file an answer to the formal

ethics complaint, allowing the matter to proceed as a default, in violation of RPC 8.1(b) (six instances). Id. at 64-65.

In recommending her disbarment, we emphasized that, despite her brief career at the bar, “she ha[d] engaged in an unrelenting course of dishonesty in an attempt to line her own pockets at the expense of her former employer and clients, who all suffered significant harm based on her failure to adhere to the basic ethical and professional precepts demanded of all New Jersey attorneys.” Id. at 65-66. Our decision remains pending with the Court.

We now turn to the matter currently before us.

Service of Process

Service of process was proper. On January 23, 2025, the DEC sent a copy of the formal ethics complaint, by certified and regular mail, to respondent’s last two known home addresses. The certified mail receipt for the letter sent to the first known home address was returned to the DEC, signed but with an illegible signature, indicating delivery on January 27, 2025. According to the United States Postal Service (USPS) tracking system, the letter sent by certified mail to the second known address was returned to the DEC as undeliverable. The regular mail sent to both home addresses was not returned.

On February 19, 2025, the DEC sent a second letter, by certified and regular mail, to both of respondent's last known home addresses. The letter informed respondent that, unless she filed a verified answer within five days of the date of the letter, the allegations of the complaint would be deemed admitted, the record would be certified to us for the imposition of discipline, and the complaint would be deemed amended to charge a willful violation of RPC 8.1(b) due to her failure to answer. The certified mail receipt for the letter sent to the first address was returned to the DEC, signed but with an illegible signature. Although the certified mail receipt was undated, the USPS tracking system confirmed that the certified letter had been signed for and accepted on February 21, 2025. On April 23, 2025, following the certification of the record in this matter, the certified mail sent to respondent's second known home address was returned to the DEC as "undeliverable." The letters sent by regular mail were not returned.

As of March 4, 2025, respondent had not filed an answer to the complaint, and the time within which she was required to do so had expired. Accordingly, the DEC certified this matter to us as a default.

On March 31, 2025, Chief Counsel to the Board sent a letter to respondent, by certified and regular mail, to her last known home addresses and her home address of record, with additional copies sent by electronic mail, to

respondent's last known e-mail addresses and e-mail address of record, informing her that this matter was scheduled before us on May 21, 2025 and that any motion to vacate the default (MVD) must be filed by April 21, 2025. That same date, the Office of Board Counsel (OBC) received a relayed receipt indicating that delivery to respondent's e-mail addresses was complete. The certified and regular mail sent to respondent's first known address, and the certified mail sent to respondent's second known address, were returned to the OBC as "not deliverable as addressed" and "unable to forward." The certified mail sent to respondent's home address of record was returned to the OBC as "unclaimed" and "unable to forward." The regular mail sent to respondent's second known address and home address of record was not returned.

Moreover, the OBC published a notice dated April 7, 2025, in the New Jersey Law Journal and on the New Jersey Courts website, stating that we would consider this matter on May 21, 2025. The notice informed respondent that, unless she filed a successful MVD by April 21, 2025, her prior failure to answer the complaint would remain deemed an admission of the allegations set forth in the complaint.

Respondent did not file an MVD.

Facts

We now turn to the allegations of the complaint. On July 25, 2022, Donnelle Fullard filed an ethics grievance against respondent, the content and allegations of which are unclear from the record before us.

On January 6 and March 2, 2023, the DEC sent a letter with a copy of the grievance, by certified and regular mail, to respondent's office address of record, directing her to submit a written reply by March 13, 2023. The signed certified mail receipt was returned to the DEC, although the signature is mostly illegible.² Respondent failed to submit a reply to the grievance.

On March 20, 2023, the DEC sent a third letter, via certified and regular mail, to respondent's office address of record.³ Again, respondent failed to reply.

On June 5, 2023, the DEC sent a fourth letter, via certified and regular mail, to respondent's office address of record. The certified and regular mail were both returned to the DEC as "refused" and "unable to forward."

On June 30, 2023, the DEC investigator unsuccessfully attempted to contact respondent by telephone.

² Although the signature is not fully legible, it appears to be signed by a person having the last name of McDaniel.

³ The DEC does not indicate whether service of this third letter was successful.

Thereafter, on March 6, 2024, the DEC sent a fifth letter, by certified and regular mail, to respondent's office address of record, and a sixth letter, on April 25, 2024, to her "home address," enclosing a copy of the ethics grievance and, again, directing her to submit a written reply.⁴ Respondent failed to reply.

Based on her failure to cooperate with the disciplinary investigation, the DEC charged respondent with having violated RPC 8.1(b). Further, based on her failure to answer the formal ethics complaint, the DEC amended the complaint to charge her with having committed a second violation of RPC 8.1(b).

Analysis and Discipline

Violations of the Rules of Professional Conduct

Following our review of the record, we find that facts set forth in the formal ethics complaint support all the charges of unethical conduct. Respondent's failure to file an answer to the complaint is deemed an admission that the allegations are true and that they provide sufficient basis for the imposition of discipline. R. 1:20-4(f)(1).

Specifically, RPC 8.1(b) requires an attorney to "respond to a lawful demand for information from . . . [a] disciplinary authority." Respondent

⁴ The DEC does not identify the specific home address that was used for the April 25, 2024 letter. Additionally, although the formal ethics complaint indicates that this final letter was sent to respondent's "home address" on April 15, 2024, the letter is dated April 25, 2024.

violated this Rule in two respects. First, she failed to cooperate with the DEC's investigation, altogether ignoring the DEC's repeated efforts to obtain her reply to the ethics grievance. Indeed, from January 6, 2023 to April 25, 2024, respondent failed to reply to any of the DEC's seven letters providing notice of the grievance. She also ignored the DEC's attempt to reach her by telephone. She violated RPC 8.1(b) a second time by failing to file an answer to the formal ethics complaint, despite proper notice, allowing this matter to proceed as a default.

In sum, we find that respondent violated RPC 8.1(b) (two instances). The sole issue left for determination is the appropriate quantum of discipline for respondent's misconduct.

Quantum of Discipline

Absent other violations of the Rules of Professional Conduct, attorneys who fail to cooperate with a disciplinary investigation and subsequently default in the resulting disciplinary proceeding typically receive a reprimand. See In re Diehl, 257 N.J. 490 (2024) (in a default matter, reprimand for an attorney who failed to cooperate with the OAE, despite its exhaustive efforts to seek his explanation of an ATA overdraft, to obtain his relevant financial records, and to conduct a demand audit; notwithstanding the Court's subsequent Order directing

the attorney to comply with the OAE's investigation, he persisted in failing to do so; in mitigation, the attorney had no prior discipline in more than thirty years at the bar), and In re Robinson, 256 N.J. 328 (2024) (in a default matter, reprimand for an attorney who failed to cooperate with a disciplinary investigation; the attorney previously had received a reprimand in a matter in which he similarly had failed to cooperate with a disciplinary investigation and had allowed the matter to proceed as a default).

Based on the foregoing precedent, we conclude that the baseline discipline for respondent's misconduct is a reprimand. To craft the appropriate discipline in this matter, however, we also consider mitigating and aggravating factors.

There is no mitigation to consider.

In aggravation, respondent failed to file an answer to the formal ethics complaint, allowing this matter to proceed as a default. See In re Kivler, 193 N.J. 332, 342 (2008) (an attorney's "default or failure to cooperate with the investigative authorities operates as an aggravating factor, which is sufficient to permit a penalty that would otherwise be appropriate to be further enhanced"). However, we considered respondent's default in setting a reprimand as the baseline discipline and, therefore, we will not enhance the discipline based on Kivler.

In further aggravation, we consider respondent's disciplinary history and

expanding interactions with disciplinary authorities. Alarming, this matter represents respondent's third default before us in her short five-year career at the bar. To that end, a review of her disciplinary timeline is appropriate.

On July 1, 2025, the Court reprimanded respondent, in Parisi I, for her failure to comply with R. 1:20-20 following her December 2023 temporary suspension. Because her instant misconduct predated the discipline imposed in Parisi I, we do not apply principles of progressive discipline to enhance the discipline in this matter. Likewise, although we transmitted our Parisi II decision to the Court, the Court has not issued its final Order of discipline.

However, respondent's failure to cooperate with the DEC's investigation in the instant matter bears a startling resemblance to her refusal to participate in the disciplinary process underlying the multiple disciplinary matters constituting Parisi II.

Specifically, in Parisi II, between January 2023 and March 2024, respondent sporadically interacted with the OAE in connection with its multiple disciplinary investigations, partially replied to one of the ethics grievances, sent incomplete submissions to the OAE, and attended only one of several interviews scheduled by the OAE. In the instant matter, she completely ignored the DEC's attempts to obtain her cooperation during approximately the same timeframe. Considering the timeline of her repeated involvement in the disciplinary system,

she clearly had a heightened awareness of her obligation under the Rules of Professional Conduct to cooperate with disciplinary authorities attempting to address her conduct in the instant matter.

Conclusion

On balance, we determine that the aggravating factors warrant enhanced discipline and, thus, conclude that a censure is the quantum of discipline necessary to protect the public and preserve confidence in the bar.

Member Campelo was absent.

We further determine to require respondent to reimburse the Disciplinary Oversight Committee for administrative costs and actual expenses incurred in the prosecution of this matter, as provided in R. 1:20-17.

Disciplinary Review Board
Hon. Mary Catherine Cuff, P.J.A.D. (Ret.),
Chair

By: /s/ Timothy M. Ellis
Timothy M. Ellis
Chief Counsel

SUPREME COURT OF NEW JERSEY
DISCIPLINARY REVIEW BOARD
VOTING RECORD

In the Matter of Brittany L. Parisi
Docket No. DRB 25-056

Decided: August 13, 2025

Disposition: Censure

Members	Censure	Absent
Cuff	X	
Boyer	X	
Campelo		X
Hoberman	X	
Menaker	X	
Modu	X	
Petrou	X	
Rodriguez	X	
Spencer	X	
Total:	8	1

/s/ Timothy M. Ellis
Timothy M. Ellis
Chief Counsel