

SUPREME COURT OF NEW JERSEY
DISCIPLINARY REVIEW BOARD
Docket No. 25-085
District Docket No. XIV-2024-0342E

In the Matter of Mary Elizabeth Lenti
An Attorney at Law

Decided
September 2, 2025

Certification of the Record

Table of Contents

Introduction.....	1
Ethics History.....	1
Lenti I.....	2
Dismissed Matter	4
Lenti II	5
Lenti III	7
Temporary Suspension.....	8
Service of Process	8
Facts.....	10
Analysis and Discipline	14
Violations of the Rules of Professional Conduct.....	14
Quantum of Discipline	16
Conclusion	19

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 Office of Attorney Ethics (the OAE), 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) and RPC 8.4(d) (engaging in conduct prejudicial to the administration of justice).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 2012 and to the Pennsylvania bar in 2011. During the relevant timeframe, she maintained a practice of law in Mount Holly, New Jersey. She has prior discipline in New Jersey.

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

Lenti I

On April 1, 2022, the Court censured respondent, in consolidated disciplinary matters, for her misconduct spanning between 2017 and 2018 and encompassing five client matters. In re Lenti, 250 N.J. 292 (2022) (Lenti I).

In the first matter comprising Lenti I, respondent misrepresented to her client, in a matrimonial matter, the dates in which she had filed the client's complaint for divorce and a proposed amended judgment for divorce. In the Matters of Mary Elizabeth Lenti, DRB 20-260 and 20-273 (June 30, 2021) at 3-4, 30-31. Additionally, she failed to file an emergent motion to compel the listing of the client's marital residence, which faced an impending threat of foreclosure. Id. at 5-6. She also misrepresented to disciplinary authorities that her office had prepared and submitted the emergent motion to the Superior Court, despite having neither drafted nor filed that motion. Id. at 30.

In the second client matter, respondent failed to communicate with a client, in a complex probate matter, and made little progress in advancing the matter before her client terminated the representation Id. at 19, 29.

In the third client matter, respondent failed, for approximately one year, to file the necessary pleadings in connection with her client's matrimonial matter. Id. at 19-20, 29. During that timeframe, respondent also failed to reply to her client's repeated inquiries regarding the status of her matter. Ibid.

In the fourth client matter, respondent failed, for approximately five months, to file an application for custody and parenting time on behalf of her client. Id. at 20-21. She also conceded that her untimely application was “poorly prepared” and “insufficient.” Ibid.

In the final client matter, respondent failed to communicate with her client “sufficiently and honestly” regarding his complex matrimonial and annulment matter. Id. at 21-22. Additionally, rather than take an active role to rectify the issues in the matter, she improperly relied on her paralegal to handle the matter, without supervision, resulting in a delay of the case and the ultimate dismissal of the pleadings. Id. at 22.

In determining that a censure was the appropriate quantum of discipline, we weighed, in aggravation, the fact that respondent’s misconduct resulted in the unnecessary delay of at least two client matters and the dismissal – and potential extinguishment – of at least one client matter. Id. at 40. Moreover, she failed to provide a \$1,250 refund to one of her clients. Ibid. However, in mitigation, we weighed respondent’s then lack of discipline; sincere remorse and contrition; prompt admission and apology for her misconduct; and the fact that she, eventually, engaged a family law attorney to help her review and advance her outstanding of family law cases. Id. at 40-41.

The Court agreed with our recommended discipline but further required that respondent refund her \$1,250 legal fee to her client within sixty days of the Court's disciplinary Order. In re Lenti, 250 N.J. 292 (2022).

Dismissed Matter

Effective June 3, 2024, the Court dismissed a formal ethics complaint charging respondent with having violated RPC 8.1(b). In re Lenti, 257 N.J. 493 (2024).² Specifically, in that matter, the OAE alleged that respondent failed to cooperate with its investigation of whether she possessed the required professional liability insurance in connection with the operation of her law firm as a limited liability company, pursuant to R. 1:21-1B(a)(4). In the Matter of Mary Elizabeth Lenti, DRB 23-204 (February 23, 2024) at 11, 13-14. However, we determined that, although respondent's submissions to the OAE were, at times, incomplete or deficient, she had engaged in consistent, good faith efforts to demonstrate to the OAE that she had, in fact, possessed the required insurance. Moreover, we found that respondent's deficient submissions appeared to have been the result of carelessness, rather than any willful failure to cooperate. Id. at 21-22.

² We do not define this disciplinary matter as Lenti II because we determined respondent did not commit any misconduct in that matter and dismissed the charge. The Court agreed.

Lenti II

Effective July 3, 2024,³ the Court suspended respondent for three months, in consolidated default matters, for her misconduct spanning between 2017 and 2022 and encompassing two client matters. In re Lenti, 257 N.J. 491 (2024) (Lenti II).

In the first client matter comprising Lenti II, respondent lied to the client, for at least five months, that his motion to increase his parenting time and to discontinue his supervised visitation had been filed and scheduled for two hearing dates before the Superior Court. In the Matters of Mary Elizabeth Lenti, DRB 23-227 and 23-228 (March 6, 2024) at 18-19. She also failed to timely reply to her client's inquiries seeking confirmation that she had filed his motion and that it was scheduled for a hearing. Ibid. In fact, respondent never filed a motion on behalf of her client. Id. at 19.

In the second matter, respondent failed, for nearly two years, to take any meaningful steps to prosecute her client's tax-sale certificate foreclosure matter. Id. at 20. During that timeframe, she not only ignored her client's inquiries regarding the status of the case, but also ignored the Superior Court's notices of dismissal due to lack of prosecution. Id. at 24-26. Respondent's inaction resulted

³ The Court filed this Order on June 3, 2024.

in the dismissal of her client's foreclosure complaints, which forced the client to retain a new attorney to complete her matter. Id. at 14, 20-21.

In determining that a three-month suspension was the appropriate quantum of discipline, we weighed, in aggravation, the developing and alarming pattern of deception (toward both clients and disciplinary authorities), failure to communicate, and total lack of diligence that respondent had exhibited since her misconduct underlying Lenti I. Id. at 26-27. We further considered respondent's heightened awareness of her obligation to cooperate with disciplinary authorities, considering that the discipline imposed in Lenti I preceded the initial contact from the District Ethics Committee investigator regarding Lenti II. Id. at 27. Nevertheless, respondent failed to file answers to the formal ethics complaints and allowed both matters in Lenti II to proceed as defaults. Id. at 28.

As a condition to her reinstatement to the practice of law, the Court ordered respondent to practice law under the supervision of a proctor for a period of one year. In its Order, the Court expressly referenced the requirements pursuant to R. 1:20-20. Subsequently, on June 3, 2024, the Court denied respondent's petition for review. In re Lenti, 257 N.J. 494 (2024).

Lenti III

Effective October 4, 2024,⁴ the Court suspended respondent for three months, in a default matter, consecutive to her three-month suspension in Lenti II, for engaging in gross neglect, lacking diligence, failing to comply with reasonable requests for information, failing to explain a matter to client to the extent reasonably necessary to permit the client to make informed decisions, and failing to communicate with her client and disciplinary authorities in one client matter. In re Lenti, 258 N.J. 450 (2024) (Lenti III). In doing so, the Court ordered respondent to comply with R. 1:20-20 and reiterated that upon reinstatement, respondent shall practice under the supervision of a proctor for one year. Ibid. Although the timeframe underlying respondent's misconduct in Lenti III largely overlapped with the timeframe in Lenti II, we determined the totality of her misconduct across all three client matters would have warranted discipline greater than a three-month suspension. In the Matter of Mary Elizabeth Lenti, DRB 24-104 (July 18, 2024) at 21-24.

⁴ The Court filed this Order on September 24, 2024.

Temporary Suspension

Effective December 18, 2024,⁵ the Court temporarily suspended respondent from the practice of law for failing to comply with a fee arbitration committee determination. In re Lenti, __ N.J. __ (2024). In its Order, the Court again expressly referenced the requirements pursuant to R. 1:20-20.

To date, respondent remains subject to disciplinary and temporary suspension from the practice of law pursuant to all three Court Orders.

We now turn to the matter pending before us.

Service of Process

Service of process was proper. On February 24, 2025, the OAE sent a copy of the formal ethics complaint, by certified and regular mail, to respondent's home address of record. The certified mail receipt was returned indicating delivery; however, it was unsigned and undated. The regular mail was not returned to the OAE.

On March 24, 2025, the OAE sent a second letter, by certified and regular mail, to respondent's home address of record, with an additional copy sent by electronic mail, to her e-mail address of record. The letter informed respondent

⁵ The Court filed this Order on November 18, 2024.

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) by reason of her failure to answer. According to the United States Postal Service (USPS) tracking system, on March 28, 2025, the certified mail was successfully delivered to respondent's home address and left with an individual. The regular mail was not returned to the OAE.

As of April 8, 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 OAE certified this matter to us as a default.

On April 28, 2025, Chief Counsel to the Board sent a letter to respondent, by certified and regular mail, to her home address of record, with an additional copy sent by electronic mail, to her personal e-mail address, informing her that this matter was scheduled before us on June 19, 2025 and that any motion to vacate the default (MVD) must be filed by May 19, 2025. The same date, the e-mail was returned as undeliverable. Consequently, on April 29, 2025, the Office of Board Counsel (the OBC) forwarded a copy of the letter to respondent's office e-mail address of record. According to the USPS tracking system, the certified mail was delivered on May 1, 2025. The regular mail was not returned to the

OBC and the e-mail sent to her e-mail address of record was not returned as undeliverable.

Moreover, the OBC published a notice dated May 5, 2025 in the New Jersey Law Journal and on the New Jersey Courts website, stating that we would consider this matter on June 19, 2025. The notice informed respondent that, unless she filed a successful MVD by May 19, 2025, her prior failure to answer the complaint would remain deemed an admission of the allegations of the complaint.

Respondent did not file an MVD.

Facts

We now turn to the allegations of the complaint.

As detailed above, effective July 3, 2024, the Court suspended respondent from the practice of law for three months in connection with her misconduct in Lenti II. Subsequently, effective October 4, 2024, the Court suspended her for an additional three months, in connection with Lenti III. Thereafter, effective December 18, 2024, the Court temporarily suspended her for failing to comply with a fee arbitration committee determination.

Respondent has neither filed a petition for reinstatement with us, nor moved for relief from the Court’s temporary suspension Order and, thus, remains suspended pursuant to all three Orders.

The Court’s suspension Orders, filed on June 3, September 24, and November 18, 2024, each directed respondent to comply with R. 1:20-20, which requires, among other obligations, that she, “within 30 days after the date of the order of suspension (regardless of the effective date thereof) file with the Director the original of a detailed affidavit specifying by correlatively numbered paragraphs how the disciplined attorney has complied with each of the provisions of this rule and the Supreme Court’s order.” Further, the Court’s June 3 and September 24, 2024 Orders expressly stated that a suspended attorney’s failure to file the affidavit of compliance constitutes a violation of RPC 8.1(b) and RPC 8.4(d).

Respondent failed to file the required affidavit of compliance. Consequently, on September 12, 2024, the OAE sent her a letter, by certified and regular mail, to her office and home addresses of record, reminding her of her obligation to file the affidavit, pursuant to R. 1:20-20, and directing that she file her affidavit by September 26, 2024. The certified mail receipt for the letter sent to respondent’s office address was returned to the OAE marked “CPO RECEIVED” and dated September 30, 2024. Subsequently, however, both the

certified and regular mail sent to respondent's office address were returned to the OAE marked "not deliverable as addressed" and "unable to forward." The certified mail sent to respondent's home address was returned to the OAE as "unclaimed" and "unable to forward." The regular mail sent to her home address was not returned to the OAE.

On September 19, 2024, respondent contacted the OAE, via telephone, and stated that she would file her affidavit of compliance by the due date set forth in the OAE's September 12, 2024 letter. She, however, failed to do so.

On October 10, 2024, the OAE sent a second letter, by certified and regular mail, to respondent's home address of record, with an additional copy send by electronic mail to a personal e-mail address, informing her that her ongoing failure to file a conforming affidavit may result in the OAE's filing of a formal ethics complaint and, further, may preclude consideration of any reinstatement petition for up to six months. The undated certified mail receipt was returned to the OAE with an illegible signature, indicating delivery. Further, the USPS tracking system indicated that the status was "Moving Through Network" as of October 21, 2024. The regular mail was not returned to the OAE. Additionally, the OAE received an email stating that delivery to the e-mail address had failed.

On November 7, 2024, the OAE send a third letter, by certified and regular mail, to respondent's home address of record, with an electronic copy sent to an alternate e-mail address, reminding her of her obligation to file the affidavit, pursuant to R. 1:20-20, and directing that she file the affidavit by November 21, 2024. The same date, the OAE received a relayed receipt indicating that delivery to respondent's alternate e-mail address was complete. The certified mail was returned to the OAE as "unclaimed" and "unable to forward." The regular mail was not returned to the OAE.

On November 13, 2024, respondent informed the OAE, via telephone, that she may be hiring counsel and anticipated that she would file her affidavit within the next two weeks. The OAE directed her to have her counsel send a letter of representation to the OAE.

As of February 20, 2025, the date of the formal ethics complaint, respondent had failed to file the required affidavit, a step required of all suspended or disbarred attorneys. Further, neither respondent nor her counsel submitted a letter of representation to the OAE. Consequently, the OAE charged respondent with having violated RPC 8.1(b) and RPC 8.4(d) for her willful violation of the Court's suspension Orders. Additionally, on notice to respondent, the OAE amended the complaint to charge her with having violated

RPC 8.1(b) a second time by failing to file a verified answer to the complaint, thus, allowing this matter to proceed as a default.

Analysis and Discipline

Violations of the Rules of Professional Conduct

Following our review of the record, we find that the facts set forth in the formal ethics complaint support all the charges of unethical conduct by clear and convincing evidence. 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, R. 1:20-20(b)(15) requires a suspended attorney, within thirty days of the Court's Order of suspension, to "file with the Director [of the OAE] the original of a detailed affidavit specifying by correlatively numbered paragraphs how the disciplined attorney has complied with each of the provisions of this rule and the Supreme Court's order."

As the Appellate Division has observed, "the provisions of R. 1:20-20(b)(1) to (14) are designed to protect clients of the [suspended or] disbarred attorney, as well as any other individuals who might unknowingly seek to retain that attorney during the period of his suspension." Eichen, Levinson & Crutchlow, LLP v. Weiner, 397 N.J. Super. 588, 596 (App. Div. 2008). Non-

compliance with R. 1:20-20 therefore obstructs one of the primary purposes of the disciplinary system, “to protect the public from an untrustworthy lawyer.” See In re Rigolosi, 107 N.J. 192, 206 (1987) (“The purpose of a disciplinary proceeding, as distinguished from a criminal prosecution, is not so much to punish a wrongdoer as it is to protect the public from an untrustworthy lawyer.”) (citing In re Pennica, 36 N.J. 401, 418-19 (1962)). Non-compliance with R. 1:20-20 may also cause “confusion among . . . clients and an administrative burden for the courts.” In re Kramer, 172 N.J. 609, 626 (2002).

For those reasons, and by operation of Rule, in the absence of an extension granted by the Director of the OAE, failure to file an affidavit of compliance pursuant to R. 1:20-20(b)(15) within the time prescribed “constitute[s] a violation of RPC 8.1(b) . . . and RPC 8.4(d).” R. 1:20-20(c).

Here, respondent willfully violated the Court’s suspension Orders, filed on June 3, September 24, and November 18, 2024, by failing to file the required affidavit, a step required of all suspended attorneys. She, thus, violated R. 1:20-20 and, consequently, RPC 8.1(b) and RPC 8.4(d). Moreover, she violated RPC 8.1(b) a second time by failing to file an answer to the formal ethics complaint, thus, allowing this matter to proceed as a default.

In sum, we conclude that respondent violated RPC 8.1(b) (two instances) and RPC 8.4(d). The sole issue left for our determination is the appropriate quantum of discipline for respondent's misconduct.

Quantum of Discipline

Attorneys with less serious disciplinary histories have received reprimands, in default matters, for their failure to file the required R. 1:20-20 affidavit. See, e.g., In re Parisi, 261 N.J. 86 (2025) (the attorney failed to file the required affidavit of compliance following her temporary suspension for failing to cooperate with an OAE investigation; no prior final discipline); In re Hildebrand, 260 N.J. 20 (2025) (the attorney failed to file the required affidavit of compliance following his six-month disciplinary suspension, in connection with a motion for reciprocal discipline; his disciplinary history consisted of only the prior six-month suspension); In re Ashton, 257 N.J. 225 (2024) (the attorney failed to file the required affidavit of compliance following his disciplinary suspension, in connection with a motion for reciprocal discipline; his disciplinary history consisted of only the prior two-year suspension); In re Cottée, 255 N.J. 439 (2023) (the attorney failed to file the required affidavit of compliance following his disciplinary suspension, in connection with a motion for reciprocal discipline; his disciplinary history consisted of only the prior

three-month suspension); In re Spielberg, 255 N.J. 469 (2022), and In re Stack, 255 N.J. 468 (2022) (the attorneys failed to file their respective affidavits of compliance following their 2020 temporary suspensions for failing to cooperate with separate OAE investigations; Spielberg had no prior final discipline and Stack had a prior 2019 admonition, in a non-default matter).

The quantum of discipline is enhanced, however, if the attorney has a more serious disciplinary history or in the presence of other aggravating factors. See, e.g., In re Coleman, 260 N.J. 99 (2025) (censure for an attorney who failed to file a R. 1:20-20 affidavit of compliance following a three-month disciplinary suspension stemming from his failure to maintain required professional liability insurance; in aggravation, the attorney's disciplinary history consisted of two censures and a three-month suspension; the matter marked his fifth encounter with the disciplinary system and his fourth default); In re Smith, 258 N.J. 27 (2024) (censure for an attorney who failed to file R. 1:20-20 affidavits of compliance following two suspensions – a one-year suspension, in a reciprocal discipline matter, based on misconduct in two client matters, and a consecutive six-month suspension, in a default matter, based on his gross mishandling of one client matter; in each disciplinary matter, the attorney ignored the Court's Order of suspension, directing that he file the affidavit, and also failed to reply to the OAE's communications attempting to ensure his compliance); In re Ludwig, 252

N.J. 67 (2022) (censure for an attorney who, following his 2021 three-month suspension, failed to file the R. 1:20-20 affidavit of compliance, despite the OAE's specific requests that he do so; in aggravation, the attorney's failure to file the affidavit constituted his third disciplinary matter in five years; prior reprimand, in addition to the 2021 disciplinary suspension, in a default matter, that gave rise to his obligation to file the affidavit).

Here, respondent's misconduct and disciplinary history is most analogous to that of the attorneys in Coleman, Smith, and Ludwig, who were censured for failing to file their R. 1:20-20 affidavits following their disciplinary suspensions. Like the attorney in Smith, who ignored two disciplinary Orders of suspension, respondent wholly ignored the Court's June 3 and September 24, 2024 disciplinary Orders suspending her from the practice of law and directing her to file the R. 1:20-20 affidavit required of all suspended attorneys in New Jersey. Respondent also ignored the Court's November 18, 2024 temporary suspension Order, which similarly obligated her to file her affidavit of compliance. Moreover, like the attorney in Ludwig, respondent has a mounting disciplinary history consisting of a censure (2022) and two separate three-month suspensions (both in 2024).

In our view, there are no additional aggravating factors to warrant a further enhancement of discipline. Conversely, this matter presents no mitigating factors for our consideration.

Conclusion

On balance, we determine that a censure is the appropriate quantum of discipline necessary to protect the public and preserve confidence in the bar.

Member Petrou voted to impose a three-month suspension.

Member Modu 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 Mary Elizabeth Lenti
Docket No. DRB 25-085

Decided: September 2, 2025

Disposition: Censure

<i>Members</i>	Censure	Three-Month Suspension	Absent
Cuff	X		
Boyer	X		
Campelo	X		
Hoberman	X		
Menaker	X		
Modu	X		X
Petrou		X	
Rodriguez	X		
Spencer	X		
Total:	7	1	1

/s/ Timothy M. Ellis

Timothy M. Ellis
Chief Counsel