SUPREME COURT OF NEW JERSEY
DISCIPLINARY REVIEW BOARD
Docket No. DRB 25-106
District Docket No. XIV-2024-0159E

In the Matter of Paul S. Foreman
An Attorney at Law

Decided
September 22, 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 Office of Attorney Ethics (the OAE), pursuant to R. 1:20-4(f). The formal ethics complaint charged respondent with having violated RPC 1.1(a) (engaging in gross neglect); RPC 1.3 (lacking diligence); RPC 1.4(b) (failing to keep a client reasonably informed about the status of a matter and to comply with reasonable requests for information); RPC 1.4(c) (failing to explain a matter to the extent reasonably necessary to permit the client to make informed decisions about the representation); RPC 1.16(d) (two instances – failing to protect a client's interests upon termination of representation and to refund the unearned portion of the fee); RPC 8.1(b) (failing to cooperate with disciplinary authorities);[1] and RPC 8.4(c) (engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation).

On June 27, 2025, respondent filed a motion to vacate the default (MVD), which we denied on July 18, 2025. For the reasons set forth below, we determine that a censure, with a condition, is the appropriate quantum of discipline for

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

respondent's misconduct.

Ethics History

Respondent earned admission to the New Jersey bar in 2006. He has no prior discipline. During the relevant timeframe, he maintained a practice of law in Roseland, New Jersey.

Effective May 10, 2024, the Court temporarily suspended respondent from the practice of law for his failure to cooperate with the OAE in an unrelated matter. In re Foreman, 257 N.J. 228 (2024). He remains temporarily suspended to date.

Service of Process

Service of process was proper. On March 3, 2025, the OAE sent a copy of the formal ethics complaint, by certified and regular mail, to respondent's current home address.[2] According to the United States Postal Service (USPS) tracking system, the letter sent by certified mail was "unclaimed" and returned to the sender. The regular mail was not returned to the OAE.

[2] Respondent's current home address, where the OAE effectuated service of the complaint in this matter, differs from his home address of record. New Jersey attorneys have an affirmative obligation to inform both the New Jersey Lawyers' Fund for Client Protection and the OAE of changes to their home and primary law office addresses, "either prior to such change or within thirty days thereafter." R. 1:20-1(c). Respondent's official Court records continue to reflect his former home address of record.

On April 9, 2025, the OAE sent a second letter, by certified and regular mail, to respondent's current home address, informing him that, unless he 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 his failure to answer. According to the USPS tracking system, the letter sent by certified mail was "unclaimed" and returned to the sender. The regular mail was not returned to the OAE.

As of April 29, 2025, respondent had not filed an answer to the complaint and the time within which he was required to do so had expired. Accordingly, the OAE certified this matter to us as a default.

On May 27, 2025, Chief Counsel to the Board sent a letter to respondent, by certified and regular mail, to his home address of record and a secondary home address (the same home address used by the OAE), with an additional copy sent by electronic mail, to his e-mail address of record, informing him that this matter was scheduled before us on July 16, 2025 and that any MVD must be filed by June 16, 2025. On May 28, 2025, the Office of Board Counsel (the OBC) received a relayed receipt indicating that delivery to respondent's e-mail had failed. Thus, on the same date, the OBC forwarded a copy of the May 27, 2025 scheduling letter to respondent, via a second e-mail address,

which immediately was returned as undeliverable. The certified mail receipt sent to respondent's home address of record was returned to the OBC, with an illegible signature, indicating delivery on May 31, 2025. According to the USPS tracking system, the certified mail sent to respondent's secondary home address was delivered and accepted by an individual at that address. Further, the certified mail receipt was returned to the OBC; however, it was unsigned. The regular mail was not returned to the OBC.

Moreover, the OBC published a notice dated June 2, 2025 in the New Jersey Law Journal and on the New Jersey Courts website, stating that we would consider this matter on July 16, 2025. The notice informed respondent that, unless he filed a successful MVD by June 16, 2025, his prior failure to answer the complaint would remain deemed an admission of the allegations of the complaint.

On June 27, 2025, respondent submitted an MVD for our consideration, consisting of a two-page certification setting forth his reasons for failing to answer the ethics complaint. As noted above, on July 18, 2025, following our review of respondent's MVD, we issued a letter denying that motion.

Facts

We now turn to the allegations of the complaint.

In June 2023, Andrea Santucci retained respondent to represent her in connection with a child support matter. The scope of respondent's representation included the drafting and filing of an application for the modification of child support and the reallocation of college and medical expenses for the child.

On June 8, 2023, Santucci paid respondent a $3,500 retainer fee, which he deposited in his attorney operating account on June 21, 2023. At the time of the deposit, his operating account held an additional $10,000 unrelated to the instant matter.

On or about June 27, 2023, respondent filed a substitution of attorney and entered his appearance on Santucci's behalf.

However, from early June through early August 2023, respondent failed to reply to Santucci's requests for status updates on her matter. Sometime in August 2023, having not heard from respondent, Santucci went to his office, which appeared to be vacant or closed. On or around September 1, 2023, respondent filed a motion, on Santucci's behalf, in the Superior Court of New Jersey, Morris County, Chancery Division – Family Part.

Thereafter, respondent again failed to reply to Santucci's inquiries concerning the status of her child support matter, causing her to contact the court

directly. The court staff informed Santucci that the court had scheduled a hearing on the motion for November 27, 2023, which the court later adjourned to December 4, 2023.

On December 4, 2023, Santucci sent multiple text messages to respondent reminding him of the scheduled hearing, including one text message sent immediately prior to the start of the hearing. Nevertheless, respondent failed to appear for the motion hearing and failed to notify Santucci or the court that he would not be present. All parties and opposing counsel attended the hearing. Due to respondent's failure to appear, the court would not permit Santucci to speak at the hearing on her own behalf and, consequently, adjourned the matter to December 18, 2023. Later that same date, respondent sent a text message to Santucci stating that he was experiencing "the hardest time" in his life between his health and "going through something similar with [his] wife."

On December 14, 2023, Santucci sent a text message to respondent, reminding him of the upcoming December 18 hearing, expressing frustration about being unable to reach him, and inquiring as to whether he intended to represent her at the hearing in the light of his ongoing failure to communicate with her. Respondent failed to reply to the text message.

On December 18, 2023, in the early morning hours before the start of scheduled hearing, Santucci sent respondent a text message reminding him of

the hearing. She also included the Zoom link for the hearing. The parties and opposing counsel attended the virtual hearing; respondent, however, again failed to appear. Respondent neither communicated with the court or Santucci concerning an inability to appear nor requested an adjournment of the hearing. In an effort to locate respondent, court staff attempted to reach him on both his cellular telephone and his office telephone, to no avail. Respondent never returned the court's telephone call. The court would not permit Santucci to speak at the hearing on her own behalf and, instead, adjourned the matter until January 16, 2024. The court also indicated that counsel fees could be awarded to opposing counsel due to respondent's repeated failure to appear.

Respondent continued to ignore Santucci's communications for the remainder of December 2023. Prior to the scheduled January hearing date, she again attempted to confirm whether respondent intended to represent her at the hearing or if she needed to proceed pro se. On or around January 2, 2024, she forwarded a substitution of attorney to respondent. On January 4, 2024, respondent sent Santucci a text message, indicating that he was in the hospital due to seizures and stating that he would refund her retainer fee.[3]

[3] Throughout January and February 2024, respondent made multiple references to medical issues, including a claim that he suffered a seizure and was admitted to the hospital. His failure to execute the substitution of attorney or otherwise withdraw from the representation, despite his alleged medical issues, could constitute a violation of RPC 1.16(a)(2) (failing to withdraw from a representation if the lawyer's physical or mental condition materially impairs the lawyer's ability

(footnote continued on next page)

The court ultimately granted Santucci's request to proceed pro se, following her statements to the court that she could not reach respondent, had not heard from him for several weeks, and could not afford to retain another attorney. On or about January 16, 2024, Santucci argued her motion without counsel and, on April 23, 2024, the court denied her application.[4]

Thereafter, and throughout February 2024, Santucci made numerous attempts to contact respondent to obtain a refund of her retainer. On January 30, 2024, respondent sent Santucci a text message indicating that his health had been "terrible over fall and winter," and stating that he would refund her retainer that week.

Between February 5 and February 19, 2024, after respondent failed to refund the retainer as promised, Santucci sent him multiple text messages requesting that he send her the refund via a Zelle bank transfer. Despite his numerous claims that he would refund the unused portion of her retainer, he failed to do so. As of January 2, 2024, respondent's attorney operating account held a balance of $69.33 and consistently held a negative balance through the

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to represent the client). However, respondent was not charged with having violated this Rule. Nevertheless, we can consider uncharged misconduct in aggravation. See In re Steiert, 201 N.J. 119 (2014) (evidence of unethical conduct contained in the record can be considered in aggravation, even though such unethical conduct was not charged in the formal ethics complaint).

[4] The record before us does not indicate that Santucci's motion was denied due to respondent's failure to represent her at the hearing. Rather, the court provided a comprehensive statement of reasons supporting the denial.

end of February 2024.

On April 15, 2024, Santucci filed an ethics grievance against respondent with the OAE. During his demand interview with the OAE, respondent asserted that he had performed between five and eight hours of work on Santucci's matter, at an hourly rate of $300, which he acknowledged was insufficient to exhaust the entirety of the $3,500 retainer.

Based on the foregoing facts, the OAE charged respondent with having violated RPC 1.1(a) by failing to appear at the motion hearings and neglecting Santucci's matter; RPC 1.3 by failing to act with diligence and promptness in his representation of Santucci; RPC 1.4(b) by failing to reply to Santucci's repeated requests for information; RPC 1.4(c) by failing to explain the matter to Santucci; RPC 1.16(d) (two instances) by abandoning his representation and failing to protect Santucci's interests and, separately, by failing to return the unearned portion of the retainer; and RPC 8.4(c) by falsely stating that he would refund the retainer to Santucci. Additionally, on notice to respondent, the OAE amended the complaint to charge him with having violated RPC 8.1(b) by failing to file a verified answer to the complaint.

Motion to Vacate the Default

As previously mentioned, on June 27, 2025, following the grant of an extension of time in which to file an MVD, respondent filed an MVD.

In support of his motion, respondent asserted that the OAE had served the complaint at his home address of record where he no longer resided. Further, he asserted that he now lives in a "three (3) family house" where, at times, his mail is discarded as "junk mail" by other individuals living in the house. He also stated that the OAE had sent a copy of the complaint, via electronic mail, to his e-mail address of record but that he now uses a different e-mail address. He stated that, if he been provided with the complaint "in a timely manner," he would have filed an answer to same. Respondent, however, altogether failed to address the underlying charges or to assert a meritorious defense to the allegations set forth in the formal ethics complaint.

In its July 3, 2025 opposition to respondent's MVD, the OAE argued that respondent had failed to satisfy either prong of the two-part test necessary to prevail on an MVD. Specifically, the OAE asserted that, as set forth in the certification of the record, it properly had served respondent at his current home address (the same home address used by respondent in his MVD). Further, the OAE noted that, on May 5, 2025, it had sent a copy of the certification of the record, via regular mail, to respondent's current home address.

The OAE also emphasized that, on May 27 and May 28, 2025, the OBC had served scheduling letters on respondent informing him that this matter was certified to us as a default pursuant to R. 1:20-4(f) and, if he wished to participate, he had to file a MVD by June 16, 2025. Rather than filing the appropriate motion, however, on June 18, 2025 respondent contacted the OBC to seek an extension of time to file his MVD. The OAE also noted that, despite the fact that the OBC's letters specifically set forth the two-prong test that respondent was required to satisfy to vacate the default, he failed to offer a meritorious defense to the charges.

To succeed on an MVD, a respondent must (1) offer a reasonable explanation for the failure to answer the ethics complaint, and (2) assert a meritorious defense to all the underlying charges. In this matter, we determined that respondent failed to satisfy the second prong.

Regarding the first prong, respondent provided some explanation for his failure to answer the ethics complaint. Regarding the second prong, however, he failed to offer any defense to the charged violations of misconduct. Rather than setting forth specific and meritorious defenses to the allegations contained in the complaint, he merely stated that he would have filed an answer to the complaint if he had received it. This approach does not constitute a "meritorious" defense

for the purposes of satisfying the second prong of the MVD test. Consequently, we concluded that he failed to satisfy the second prong of the MVD analysis.

Based on respondent's failure to satisfy the second prong necessary to vacate the default, we determined to deny his MVD and notified him of same.

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 most, but not all, of 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).

Notwithstanding that Rule, each charge in the complaint must be supported by sufficient facts for us to determine that unethical conduct has occurred. See In re Pena, 164 N.J. 222, 224 (2000) (noting that the Court's "obligation in an attorney disciplinary proceeding is to conduct an independent review of the record, R. 1:20-16(c), and determine whether the [ethics] violations found by the [Board] have been established by clear and convincing evidence"); see also R. 1:20-4(b) (entitled "Contents of Complaint" and

requiring, among other notice pleading requirements, that a complaint "shall set forth sufficient facts to constitute fair notice of the nature of the alleged unethical conduct").

Specifically, RPC 1.1(a) prohibits lawyers from handling matters entrusted to them in a manner that constitutes gross neglect. This Rule was designed to address "deviations from professional standards which are so far below the common understanding of those standards as to leave no question of inadequacy." In the Matter of Dorothy L. Wright, DRB 22-100 (November 7, 2022) at 17 (quoting Report of the New Jersey Supreme Court Committee on the Model Rules of Professional Conduct (Debevoise Committee Report), Section VI Lawyer Competence, Rule 1.1 (June 24, 1983)), so ordered, 254 N.J. 118 (2023). Further, RPC 1.3 requires lawyers to act with reasonable diligence and promptness in representing clients. Here, respondent violated both RPC 1.1(a) and RPC 1.3 by failing to appear, on his client's behalf, at three motion hearings and by performing little to no work in furtherance of the representation.

Next, RPC 1.16(d) provides that, upon termination of representation:

> A lawyer shall take steps to the extent reasonably practicable to protect a client's interests, such as giving reasonable notice to the client, allowing time for employment of other counsel, surrendering papers and property to which the client is entitled and refunding any advance payment of fee that has not been earned or incurred.

Respondent violated this Rule in two respects. First, he failed to protect Santucci's interests upon termination of the representation. Importantly, "termination," as set forth in the Rule, encompasses instances of constructive termination, where the attorney-client relationship is not formally severed. For example, in In the Matter of Stephen Paul Hildebrand, DRB 22-208 (May 1, 2023) at 10, 11, 20, so ordered, 254 N.J. 371 (2023), we found that the attorney had violated RPC 1.16(d) by stopping all work and missing all court appearances before the court removed him as counsel at his client's request. The fact that the attorney's shortcomings occurred before the removal order did not prevent a finding that he violated RPC 1.16(d). Here, respondent's decision to cease all work and his failure to appear at three court hearings clearly and convincingly supports the conclusion that he violated RPC 1.16(d). Respondent violated this Rule a second time, as the OAE separately charged, by failing to refund any unused portion of the retainer, despite Santucci's numerous requests that he do so. Thus, respondent violated RPC 1.16(d) (two instances).

We decline to find, however, that respondent violated RPC 1.16(d) under a theory of client abandonment, as the OAE had characterized the misconduct in the complaint. It is well-settled that "client abandonment requires a clear and convincing showing that the attorney disappeared and cannot be found." In the Matter of Kevin C. Fogle, DRB 17-358 (April 11, 2018) at 16, so ordered, 235

N.J. 417 (2018); compare In re In re Ashton, __ N.J. __ (2022), 2022 N.J. LEXIS 462 (finding abandonment of three clients where the attorney was no longer renting the office from which he had practiced law and clients were unable to contact or locate him; for the attorney's gross neglect and other misconduct, two-year suspension), and In re Saponaro, 249 N.J. 352 (2022) (the attorney abandoned his law practice and could not be located; we determined that the attorney's abandonment of three clients warranted at least a three-month suspension; one-year suspension based on aggravating factors), to In the Matter of Stephanie Julia Brown, DRB 19-039 (September 5, 2019), so ordered, 246 N.J. 456 (2021) (although the formal ethics complaint characterized the attorney's misconduct as "abandonment," we did not employ this analysis, where the attorney terminated the client's representation midway through litigation, without explanation and without informing the client about upcoming hearing, causing the client to be subject to fees and sanction; the attorney further delayed returning the file to the client; based on this and other misconduct, including her misrepresentations to the client, failing to abide by the client's decisions concerning objectives of representation, and engaging in conduct prejudicial to the administration of justice, we determined that the baseline discipline of a reprimand should be enhanced to a three-month suspension; in aggravation, the client was harmed and she allowed the matter to proceed as a

default).

Here, although respondent repeatedly failed to communicate with Santucci, he occasionally did reply to her text messages and the record does not establish, by clear and convincing evidence, that he had, in fact, shuttered his office during the period of representation. Accordingly, we decline to apply a theory of client abandonment to support our RPC 1.16(d) analysis.

The record amply supports a finding that respondent violated RPC 1.4(b), which requires attorneys to keep their clients "reasonably informed about the status of a matter," and RPC 1.4(c), which requires attorneys to "explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation." Respondent violated both Rules by failing to reply to Santucci's numerous attempts to contact him and by failing to specifically reply as to whether he intended to represent her going forward, thereby depriving her of the opportunity to make an informed decision concerning the need to seek new counsel.

Further, respondent violated RPC 8.1(b), which requires an attorney to "respond to a lawful demand for information from . . . [a] disciplinary authority," by failing to file an answer to the formal ethics complaint.

We decline to find, however, that respondent violated RPC 8.4(c), which prohibits an attorney from engaging "in conduct involving dishonesty, fraud,

deceit or misrepresentation." The OAE alleged that respondent violated this Rule by repeatedly promising Santucci that he would refund her retainer despite the fact that, at the same time he was making these assurances, his bank records reflected a negative balance in his operating account. However, it is well-settled that a violation of this Rule requires a finding that the attorney engaged in a knowing act of deception by clear and convincing evidence. See In the Matter of Ty Hyderally, DRB 11-016 (July 12, 2011). In our view, the record before us lacks clear and convincing evidence that respondent intentionally lied when he told Santucci that he would refund her retainer. The mere fact that his operating account balance was insufficient to refund the retainer does not, standing alone, establish that he did not intend to refund it to her from a different source or account. On these facts, we determine that there is insufficient evidence to sustain this charge.

In sum, we find that respondent violated RPC 1.1(a); RPC 1.3; RPC 1.4(b) and (c); RPC 1.16(d) (two instances); and RPC 8.1(b). We determine to dismiss the charge that respondent violated RPC 8.4(c). The sole issue left for our determination is the appropriate quantum of discipline for respondent's misconduct.

Quantum of Discipline

Generally, in default matters where the attorney has no disciplinary history, a reprimand is imposed for lack of diligence, failure to communicate with clients, and failure to cooperate with disciplinary authorities, even if such conduct is accompanied by similar ethics infractions. See In re Robinson, 253 N.J. 328 (2023) (the attorney failed to appear at scheduled hearings in connection with two client matters; in one client matter, the attorney also failed to file an appeal for which he specifically had been retained; in the second client matter, the attorney failed to file required documents in a bankruptcy matter and failed to explain to the client the alternatives of pleading guilty in connection with her separate municipal court matter; the attorney also failed to file a reply to the first client's grievance and allowed both matters to proceed as a default; no disciplinary history), and In re Vena, 227 N.J. 390 (2017) (the attorney failed to (1) communicate with a client, (2) explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation, and (3) cooperate with disciplinary authorities; the attorney also violated RPC 1.16(a)(3) (failing to withdraw from the representation despite being discharged by the client), RPC 3.3(a) (making a false statement of material fact or law to a tribunal), and RPC 8.4(c); no disciplinary history).

Attorneys who violate RPC 1.16(d), even when accompanied by other,

non-serious ethics infractions, receive admonitions. See In the Matter of Karim K. Arzadi, DRB 23-169 (October 26, 2023) (the attorney, whose representation was terminated by the client, thereafter failed to file either a substitution of counsel or a motion to be relieved as counsel; during the next several months, while the attorney remained counsel of record, the client, who wished to proceed pro se, was unable to pursue settlement negotiations with the opposing party, and the client's lawsuit ultimately was dismissed for failure to prosecute; violations of RPC 1.16(a)(3) and RPC 1.16(d)), and In the Matter of Gary S. Lewis, DRB 21-247 (February 18, 2022) (the attorney failed to notify his clients of the sale of his law practice to another attorney, thereby depriving his clients of the opportunity to retain other counsel and to retrieve their property and files; violations of RPC 1.15(d) (failing to comply with the recordkeeping requirements of R. 1:21-6) and RPC 1.17(c) (engaging in the improper sale of a law practice); among other mitigating factors, we weighed that the attorney's sale of his law practice may have resulted from his spouse's emergent medical situation, he cooperated with disciplinary authorities by stipulating to the facts underlying his misconduct, and, in forty-six years at the bar, he had only one prior admonition, twelve years earlier, for unrelated misconduct).

Similarly, admonitions typically are imposed for failure to cooperate with disciplinary authorities, if the attorney has a limited or no ethics history. See In

the Matter of Michael Martin McDonnell, DRB 23-034 (July 6, 2023) (in a default matter, the attorney failed to cooperate with the underlying ethics investigation, despite the investigator's repeated efforts to reach him; the attorney thereafter failed to file an answer to the formal ethics complaint; in imposing only an admonition, we considered the attorneys unblemished thirty-year career at the bar), and In the Matter of Giovanni DePierro, DRB 21-190 (January 24, 2022) (the attorney failed to reply to letters from the investigator in the underlying ethics investigation; the attorney also violated RPC 1.4(b); RPC 1.5(c) (failing to set forth, in writing, the basis or rate of the attorney's fee in a contingent fee case); and RPC 1.16(d); no prior discipline in twenty-year career at the bar).

Based on the foregoing disciplinary precedent, Robinson and Vena in particular, we determine that the baseline discipline for respondent's misconduct is at least a reprimand. To craft the appropriate discipline in this case, however, we also consider mitigating and aggravating factors.

In mitigation, respondent has no prior discipline in his eighteen-year career at the bar. Although the record indicates that respondent may have experienced medical and personal issues during the relevant period, he failed to file an answer to the complaint and, consequently, offered no additional mitigation for our consideration.

In aggravation, respondent's inaction caused considerable delays in connection with the child support modification hearing. Making matters worse, Santucci could not appear on her own behalf during those hearings until he withdrew from the representation, which he failed to do. Further, his failure to refund the retainer to Santucci prevented her from using those funds to retain new counsel and, ultimately, she proceeded pro se. It is well-settled that harm to the client constitutes an aggravating factor. In the Matter of Brian Le Bon Calpin, DRB 13-152 (October 23, 2013), so ordered, 217 N.J. 617 (2014).

Additionally, respondent failed to file an answer to the complaint, allowing this matter to proceed as a default, an aggravating factor that ordinarily warrants an enhancement of the discipline. In re Kivler, 193 N.J. 332, 342 (2008). However, because we already factored respondent's default status into the baseline discipline of a reprimand, we do not accord this aggravating factor additional weight.

Conclusion

On balance, we determine that the aggravating factors, including the harm to respondent's client, outweigh the sole mitigating factor. Thus, we conclude that a censure is the appropriate quantum of discipline necessary to protect the public and preserve confidence in the bar.

Moreover, given respondent's performance of little to no work on behalf of his client, and considering his repeated promises to return the full fee to the client, we further determine to recommend that, as a condition, respondent be required to refund the entire fee to Santucci within sixty days of the Court's issuance of a disciplinary Order in this matter.

Vice-Chair Boyer and Members Hoberman and Petrou were 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 Paul S. Foreman
Docket No. DRB 25-106

Decided: September 22, 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:	6	3

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