SUPREME COURT OF NEW JERSEY
DISCIPLINARY REVIEW BOARD
Docket No. DRB 25-253
District Docket No. XIV-2023-0364E

In the Matter of Anthony Sosa
An Attorney at Law

Argued
January 15, 2026

Decided
March 30, 2026

Samuel M. Silver appeared on behalf of the
Office of Attorney Ethics.

Randall T. Tesser appeared on behalf of respondent.

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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 disciplinary stipulation between the Office of Attorney Ethics (the OAE) and respondent. Specifically, respondent stipulated to having violated RPC 3.3(a)(1) (making a false statement of material fact to a tribunal); RPC 8.1(a) (knowingly making a false statement of material fact to disciplinary authorities); RPC 8.1(b) (failing to cooperate with disciplinary authorities); RPC 8.4(a) (two instances – violating or attempting to violate the Rules of Professional Conduct); RPC 8.4(c) (three instances – engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation); and RPC 8.4(d) (engaging in conduct prejudicial to the administration of justice).

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

Ethics History

Respondent earned admission to the New Jersey bar in 2021 and to the New York bar in 2020. During the relevant time, he maintained a practice of law in Suffern, New York. He has no prior discipline in New Jersey.

Motion for a Protective Order

On January 14, 2026, the OAE filed a motion for a protective order, on consent, prohibiting the public disclosure of its formal ethics complaint, exhibits, hearing transcripts, the disciplinary stipulation, and any related hearing records. In support of its motion, the OAE included a proposed form of order and cover letter. According to the OAE, pursuant to R. 1:20-9(i), and consistent with R. 1:23-3, governing the confidentiality of records maintained by the Board of Bar Examiners, a protective order was required to ensure the confidentiality of the bar admission records of another jurisdiction.

On January 16, 2026, we entered an order granting, in part, the OAE's motion and sealing, as confidential, exhibits one through eleven. Although we denied the OAE's request to seal the disciplinary stipulation, we ordered that, to the extent public dissemination of the disciplinary stipulation was necessary, all confidential information shall be redacted.

We considered the entirety of the record in our de novo review of this matter. However, in view of the protective order, we have omitted from our decision specific reference to confidential records or information.

Facts

Respondent and the OAE entered into a disciplinary stipulation, dated October 1, 2025, which sets forth the following facts in support of respondent's admitted ethics violations.

On September 19, 2023, the OAE commenced an investigation following receipt of a referral from another jurisdiction's bar examining committee (the Committee), regarding respondent's June 8, 2021 application for admission to that jurisdiction.

Approximately two years prior to the referral, in January 2021, respondent became a Notary Public in the State of New York.

On November 2, 2021, the Committee sent respondent an e-mail, noting that he had signed, in his capacity as a Notary Public, six personal reference Forms (the Forms) submitted in connection with Ashley Cuadrado's bar application to the same jurisdiction (the Application).[1] The six Forms purportedly were signed by three individuals.

Based on the Forms respondent had notarized, the Committee asked him to submit an affidavit, under oath, addressing the following three questions: (1) whether the three individuals had appeared before him, in person, to sign the

[1] Cuadrado had notarized respondent's bar application to the same jurisdiction, as well as his personal reference Forms.

Forms, (2) whether he had confirmed the identity of the three individuals, and (3) whether he personally had signed all the Forms. Additionally, the Committee invited respondent to include any additional, relevant information in his responsive affidavit.

In his November 21, 2021 reply, respondent provided the Committee with an affidavit (the November Affidavit) in which he attested that, on June 8, 2021, all three individuals personally had appeared before him. He also attested that he had confirmed their identities by inspecting either a driver's license or a passport and, further, that he personally had witnessed them sign the Forms. In his November Affidavit, respondent further stated that, on July 26, 2021, he repeated that process and, additionally, that he had signed all six Forms in his capacity as a Notary Public. He also attested that he and Cuadrado were co-workers at the time he notarized the Forms and her personal references came to their office on days they knew he would be present.

On December 9, 2021, the Committee sent another letter to respondent, informing him that it was conducting a further inquiry into his application for admission to the bar of the jurisdiction and that, as a result, the Committee was not recommending him for admission at that time.

Two months later, on February 8, 2022, the Committee sent a letter to respondent, informing him that he was required to address his November

Affidavit. Specifically, the Committee asked respondent to reflect upon the November Affidavit and informed him that the signatures of the three individuals cast doubt on the credibility of the November Affidavit. Therefore, the Committee stated that it was providing respondent "with one final opportunity to amend your previous statements on this issue." Accordingly, the Committee, again, asked respondent to address whether the references personally appeared before him on June 8 and July 26, 2021 and, if so, whether he confirmed their identities and witnessed their signatures on the Forms.

On March 9, 2022, respondent submitted a second affidavit in reply to the Committee's inquiries (the March Affidavit). In his March Affidavit, respondent admitted that, at the time both he and Cuadrado were applying for admission to the bar of that jurisdiction, Cuadrado requested that he witness and notarize the Forms of her personal references. However, "after multiple failed attempts to coordinate schedules for the signings, on June 8, 2021, Ms. Cuadrado requested that I sign and stamp the affidavits prior to their being signed by the affiants."[2] Respondent asserted that, although he was not comfortable notarizing the Forms outside the presence of the witnesses, he agreed to do so after Cuadrado assured

[2] The OAE also charged Cuadrado with having committed misconduct in connection with her own application for admission to the bar of that jurisdiction. On February 3, 2026, we transmitted to the Court our letter decision recommending a censure for her misconduct. That decision remains pending with the Court. See In the Matter of Ashley Michelle Cuadrado, DRB 25-244 (February 3, 2026).

him that she was attending an event in the near future at which all three references would be present.

Respondent explained that he knew pre-notarizing the Forms was wrong; however, he did so because he trusted that Cuadrado, who was a colleague and an attorney, would have the affidavits properly signed. He added that, after the Committee informed Cuadrado that her references were required to individually return their Forms, via regular mail, she requested that respondent pre-notarize the Forms a second time, which he agreed to do. Respondent admitted that none of Cuadrado's references personally had appeared before him on either June 8 or July 26, 2021. Respondent acknowledged that "[i]t is never acceptable to falsely notarize a document or to lie in an affidavit."

On July 25, 2022, the Committee advised respondent that it had voted to schedule a formal hearing regarding his admission application and, on March 17, 2023, notified him that the hearing would occur on April 26, 2023. On April 6, 2023, in reply to the Committee's e-mail providing the virtual link for the ethics hearing, he advised the Committee that he had decided to withdraw his application for admission to the bar of that jurisdiction. The Committee declined respondent's request and, on April 26, 2023, the hearing occurred as scheduled. On June 30, 2023, a panel of the jurisdiction's bar examining committee (the Panel) issued its written decision.

In connection with our review of this matter, we considered both the confidential transcript of the April 26, 2023 hearing and the Panel's confidential written decision.

Based on the foregoing facts, the parties stipulated that respondent violated RPC 3.3(a)(1), RPC 8.1(a), and RPC 8.1(b) by knowingly making false statements to the Committee in his November Affidavit. The parties also stipulated that respondent violated RPC 8.4(a) by assisting in Cuadrado's violation of the Rules of Professional Conduct by improperly notarizing her reference Forms on June 8, 2021 and July 26, 2021.

Additionally, the parties stipulated that respondent violated RPC 8.4(c) three ways – by twice improperly notarizing the Forms, and also by submitting the November Affidavit, knowing the information contained therein was false. Last, the parties stipulated that respondent violated RPC 8.4(d) by submitting his November Affidavit, which resulted in the Committee expending additional resources to schedule a formal hearing to address respondent's misconduct.

The Parties' Positions Before the Board

In its brief and during oral argument before us, the OAE recommended either a censure or a three-month suspension for respondent's misconduct.

Specifically, the OAE analogized respondent's false jurats to that of the attorney in In re Coughlin, 91 N.J. 374 (1982), who was reprimanded for executing a jurat and completing an acknowledgement on a deed without the presence of the grantor. The OAE asserted that, like Coughlin, respondent executed a jurat in the absence of the individual and affirmed that the information contained in the jurat was truthful, despite knowing it was not.

Additionally, the OAE asserted that respondent's misrepresentation to the Committee, in his November Affidavit, was similar to the misconduct we addressed in In re Trustan, 202 N.J. 4 (2010). In that matter, the attorney, who was suspended for three months, submitted to the court a client's case information statement that falsely asserted that the client owned a home, and drafted a false certification for the client, which was submitted to the court in a domestic violence trial. The attorney also committed additional misconduct. However, the OAE distinguished respondent's misconduct from that of the attorney in In re Silberberg, 144 N.J. 215 (1996), who received a two-year suspension. In the OAE's view, unlike Silberberg, who notarized the signature of an individual he knew to be deceased, here, respondent trusted that his colleague, Cuadrado, who also is an attorney, would have the Forms properly signed by the affiants. The OAE also asserted that, unlike Silberberg, who provided two false written statements to ethics authorities concerning his notarization of a document, respondent provided only one false statement before admitting he improperly had notarized the Forms.

Furthermore, the OAE contended that respondent's misrepresentation to the Committee was similar to that of the attorney in In re Solvibile, 156 N.J. 321 (1998), who misrepresented to the Pennsylvania Board of Law Examiners that the money order that accompanied her application had been misdated and that she had mailed the application prior to the filing deadline. The OAE asserted that respondent's misconduct was analogous because, like Solvibile, it was not until after ethics authorities accorded respondent an opportunity to be honest that he corrected his misrepresentation. However, unlike Solvibile, respondent was not motivated by self-interest.

The OAE further analogized respondent's misconduct to that of the censured attorneys in In re Duke, 207 N.J. 37 (2011) (the attorney failed to disclose to the Board of Immigration Appeals that he had been disbarred in New York; the attorney also deposited his fee in his personal bank account, rather than in his attorney business or trust account, failed to communicate with his client by not providing the client with copies of his submissions to the Board of Immigration Appeals, and failed to return his client's numerous telephone calls; the attorney had a prior reprimand for negligent misappropriation and recordkeeping infractions; in mitigation, we weighed the attorney's sincere contrition and significant efforts in rehabilitation), and In re Monahan, 201 N.J. 2 (2010) (the attorney submitted two certifications to a federal district court in support of a motion to extend the time within which to file an appeal; the attorney misrepresented that, when the appeal was due to be filed, he was seriously ill and confined to his home on bed rest and, therefore, was unable to work or to prepare and file the appeal, a violation of RPC 3.3(a)(1); the attorney also practiced law while ineligible).

Based on the foregoing precedent, the OAE asserted that the baseline discipline for respondent's misconduct was a censure.

In mitigation, the OAE noted that respondent has no disciplinary history. In further mitigation, he entered into a stipulation, demonstrated contrition and remorse, and his misconduct was not for personal gain.

In aggravation, the OAE asserted that respondent lacked candor with the Committee during its investigation into his false notarizations. He also failed to remediate his misconduct, despite having multiple opportunities to do so. The OAE asserted that, based on the weight we accord to applicable aggravating factors, a short term of suspension was supportable, citing Solvibile, 156 N.J. 321 and In re Bernardino, 198 N.J. 377 (2009) (three-year suspension, in a reciprocal discipline matter, for an attorney who failed to disclose, in his application to practice before the United States Patent and Trademark Office

(USPTO), that he was under criminal and disciplinary investigation for conduct with respect to his former employer, who had terminated him for dishonest conduct; the attorney also failed to provide complete information and documentation regarding an outstanding tax liability to the federal government; the attorney actively misled the USPTO, for eight months, regarding the status of the disciplinary investigation and the tax matter; the attorney had a prior one-year suspension).

In his brief and during oral argument before us, respondent acknowledged that his misconduct was serious; however, he urged that the mitigating factors supported a censure. Specifically, in addition to the mitigating factors identified in the stipulation, respondent asserted that his request to withdraw his application to the bar in that jurisdiction should serve as a mitigating factor. In his submission to us, he included his April 6, 2023 e-mail to the Committee, in reply to its e-mail providing the link for the ethics hearing, advising that he had decided to withdraw his application for admission in that jurisdiction.

Although respondent agreed with the OAE's citation to analogous disciplinary precedent, he asserted that his misconduct was "borne out of the same series of actions, not discrete instances of misconduct." Furthermore, he maintained that, had the Committee granted his request to withdraw his bar application, the RPC 8.4(d) charge could have been avoided.

Moreover, respondent contended that the aggravating factors identified by the OAE formed the basis for the RPC 3.3(a)(1), RPC 8.1(a), and RPC 8.1(b) charges and, thus, should not be accorded additional weight in aggravation. Additionally, respondent asserted that, after his initial misrepresentations to the Committee, he remediated his misconduct via the March Affidavit. Thus, respondent urged that a censure was the appropriate quantum of discipline for his misconduct.

Analysis and Discipline

Violations of the Rules of Professional Conduct

Following a review of the record, we find that the stipulated facts in this matter clearly and convincingly support respondent's admitted violations of RPC 3.3(a)(1); RPC 8.1(a); RPC 8.1(b); and RPC 8.4(c) (three instances). However, we determine to dismiss the charge that respondent violated RPC 8.4(a).

Specifically, respondent admittedly violated RPC 8.4(c) in numerous respects. First, he violated this RPC by notarizing the first set of Forms, even though none of the signatories personally had appeared before him. By attesting to the signatories' personal appearances, he made a false statement of fact to the Committee. After the Committee rejected Cuadrado's initial Forms, respondent again falsely notarized the second set of Forms, thereby violating RPC 8.4(c) a second time. The Court has long held that the requirements for the execution of jurats and the taking of acknowledgements must be met in all respects. See In re Surgent, 79 N.J. 529, 532 (1979). Attorneys who have taken improper jurats, or signed the names of others, even with authorization, are guilty of misrepresentation, in violation of RPC 8.4(c). See In re Hock, 172 N.J. 349 (2002).

Thereafter, when the Committee began investigating respondent's conduct as it related to Cuadrado's Application, he violated RPC 3.3(a)(1); RPC 8.1(a); RPC 8.1(b); RPC 8.4(c); and RPC 8.4(d).

Specifically, respondent falsely attested, in the November Affidavit, that, on two separate occasions, each reference personally appeared before him and provided either a driver's license or passport to confirm their identity, in violation of RPC 3.3(a)(1), RPC 8.1(a), and RPC 8.4(c). It was not until after the Committee confronted respondent with the Forms he improperly had notarized that he withdrew his prior false statements and admitted that none of the references had ever personally appeared before him. Further, by failing to disclose a fact necessary to correct a misapprehension known by respondent in connection with Cuadrado's bar application, he violated RPC 8.1(b).

Next, respondent's decision to falsely notarize the Forms, on two separate occasions, resulted in the waste of the Committee's resources, in violation of RPC 8.4(d). As a result of respondent's false statements, the Committee commenced an investigation and scheduled a hearing to ascertain the truth.

In our view, respondent's explanation for his false statements in the November Affidavit is dubious. Specifically, in its initial letter, the Committee asked him specific questions regarding his notarization of the two sets of Forms. Rather than candidly admit that he improperly had notarized the Forms, he intentionally lied to the Committee. His explanation that he failed to appreciate the seriousness of his false notarizations or his obligation to be truthful in his affidavit to the Committee – at a time he, too, was applying for admission to the bar in that jurisdiction – is simply unconvincing.

Additionally, we reject respondent's argument that, if the Committee had accepted his request to withdraw his application for admission to the bar, he could have avoided the RPC 8.4(d) charge. Importantly, respondent attempted to withdraw his bar application following his receipt of the link to the Committee's virtual hearing, which was sent to him just twenty days before that hearing was scheduled to begin, despite receiving, nine months earlier, notice that the Committee voted to schedule a formal hearing on his application. In our view, respondent's last-minute attempt to withdraw his application simply evinces an attempt to avoid participating in the hearing.

However, we decline to find that respondent violated RPC 8.4(a). Historically, we have rejected charges that an attorney violated this Rule by virtue of their violation of other RPCs, determining, instead, that an attorney typically violates RPC 8.4(a) if they induce another to violate the Rules of Professional Conduct. See In the Matter of David Jay Bernstein, DRB 21-011 (September 22, 2021) (RPC 8.4(a) charge dismissed as subsumed within the attorney's violations of other Rules of Professional Conduct), so ordered, 249 N.J. 257 (2022). As respondent admitted, there is no question he helped Cuadrado violate the Rules of Professional Conduct. However, that misconduct is subsumed within his violation of the underlying RPCs addressing his dishonesty toward the Committee.

In sum, we find that respondent violated RPC 3.3(a)(1); RPC 8.1(a); RPC 8.1(b); RPC 8.4(c) (three instances); and RPC 8.4(d). However, we dismiss the charge that respondent violated RPC 8.4(a). The sole issue left for our determination is the appropriate quantum of discipline for respondent's misconduct.

Quantum of Discipline

In New Jersey matters addressing a lawyer's dishonesty in connection with a bar admission application, the discipline has ranged from a reprimand to revocation of the lawyer's license to practice law, depending on the severity of the misconduct and the presence of other Rule violations or aggravating factors. See In re Thyne, 214 N.J. 107 (2013) (reprimand for an attorney who failed to disclose, in his application for admission to the United States Court of Appeals for the Second Circuit, that he was no longer in good standing in Minnesota, where he had ceased paying his annual fee; the attorney also failed to disclose a pending OAE investigation for dishonest conduct; the attorney knowingly withheld the details of the OAE investigation because, in his view, it was irrelevant to his admission to the Second Circuit; in mitigation, the attorney had no prior discipline in his more than twenty years at the bar); Duke, 207 N.J. 37 (censure for an attorney who failed to disclose to the Board of Immigration Appeals that he had been disbarred in New York; the attorney also deposited a legal fee in his personal bank account, rather than in his attorney business or trust account, failed to communicate with his client by not providing the client with copies of his submissions to the Board of Immigration Appeals, and failed to return his client's numerous telephone calls; the attorney had a prior reprimand for negligent misappropriation and recordkeeping infractions; in mitigation, we weighed the attorney's sincere contrition and significant efforts at rehabilitation); Solvibile, 156 N.J. 321 (six-month suspension for an attorney's misrepresentation to the Pennsylvania Board of Law Examiners that she had mailed her admission application prior to the closing deadline); In re Czmus, 170 N.J. 195 (2001) (attorney's license revoked for his failure to disclose on his New Jersey bar admission application that he had surrendered his license to practice medicine in California and New York; he also lied about his education, employment, other licenses, disciplinary proceedings, and legal proceedings; he was precluded from seeking readmission for two years);

The discipline imposed on attorneys who make misrepresentations to a court or exhibit a lack of candor toward a tribunal, or both, ranges from an admonition to a significant term of suspension. See, e.g., In the Matter of George P. Helfrich, Jr., DRB 15-410 (February 24, 2016) (admonition for an attorney who failed to notify his client and witnesses of a pending trial date; thereafter, he appeared at two trial dates, but failed to inform the trial judge and his adversary that he had not informed his client or the witnesses of the trial date; significant mitigation); In re McHugh, __ N.J. __ (2023), 2023 N.J. LEXIS 10 (reprimand for an attorney who, during a partnership dispute, reached a settlement agreement but, in a certification to the court, failed to disclose the settlement agreement; he also failed to inform the court he disbursed funds to himself; in addition, the attorney violated a court order by transferring funds to his account, which the court described as a "self-help remedy;" no prior discipline); In re Chase, 260 N.J. 590 (2025) (censure for an attorney who, without his client's knowledge or consent, signed and filed with the court a stipulation that misrepresented that he had the client's authorization to stipulate to the dismissal when, in fact, he did not; the attorney also failed to abide by the client's decisions concerning a pending motion for summary judgment and failed to communicate with his client); In re Gonzalez, 256 N.J. 509 (2024) (three-month suspension for an attorney who intentionally misrepresented to the District Ethics Committee (DEC), the OAE, and to us that he had terminated his wife's employment at his law firm after blaming her for his firm's recordkeeping irregularities, knowing his omission would mislead disciplinary authorities; the attorney had prior discipline); In re Alexander, 243 N.J. 288 (2020) (three-month suspension for an attorney who gave false testimony before a hearing officer and a Superior Court judge in connection with a domestic violence matter; the attorney filed a false domestic violence complaint against his paramour, leading to the issuance of a temporary restraining order in the attorney's favor; thereafter, during a two-day Superior Court hearing, the attorney's paramour presented an audio recording of the alleged incident, which contradicted the attorney's testimony; although the judge allowed the attorney the opportunity to review the evidence and withdraw his false testimony, the attorney refused to do so; instead, the attorney presented an audio-visual recording of the incident, which again contradicted his version of events; the attorney also misrepresented the nature of his testimony to the OAE; no prior discipline in his twelve-year career at the bar).

Generally, in matters involving misrepresentations to ethics authorities, the discipline ranges from a reprimand to a term of suspension, depending on the gravity of the offense, the presence of other misconduct, and aggravating or mitigating factors. See, e.g., In re DeSeno, 205 N.J. 91 (2011) (reprimand for an attorney who misrepresented to a DEC the filing date of a complaint on a client's behalf; the attorney also failed to adequately communicate with the client and failed to cooperate with the investigation of the grievance; prior reprimand); In re Otlowski, 220 N.J. 217 (2015) (censure for an attorney who made misrepresentations to the OAE and to a client's lender by claiming that funds belonging to the lender, which had been deposited in the attorney's trust account, were frozen by a court order; to the contrary, they had been disbursed to various parties); In re Freeman, 235 N.J. 90 (2018) (three-month suspension for an attorney performing pool work for the Office of the Public Defender (OPD); the attorney failed to communicate with his client about an upcoming hearing on a petition for post-conviction relief; the attorney appeared at the hearing without the client, took actions that were contrary to the client's wishes, and made misrepresentations to the court and the OPD; those statements would later negatively impact the client's ability to pursue an appeal; during the ethics investigation, the attorney lied to the DEC investigator, and later to the hearing panel); Silberberg, 144 N.J. 215 (two-year suspension for an attorney who, in a real estate closing, allowed the buyer to sign the name of the co-borrower; the attorney then witnessed and notarized the "signature" of the co-borrower; the attorney stipulated that he knew, at the time, that the co-borrower was deceased; after the filing of the ethics grievance against him, the attorney falsely stated that the co-borrower had attended the closing; on another occasion, the attorney sent a false, seven-page certification to the DEC in an attempt to cover up his improprieties); In re Clausen, 231 N.J. 193 (2017) (three-year suspension, in a default matter, for an attorney who, in connection with a voluntary bankruptcy petition, made multiple misrepresentations, under penalty of perjury, regarding his debt and his creditors in an attempt to manipulate the bankruptcy code for his personal benefit, violations of RPC 3.3(a)(1) and (5); RPC 8.4(c) and (d); in connection with an earlier disciplinary matter involving his mishandling of a client's case, he made misrepresentations to us regarding the status of payments made to the client, in an attempt to mitigate the discipline imposed on him, violations of RPC 3.3(a)(1) and (5) and RPC 8.4(c); he also made multiple misrepresentations during an OAE demand audit and committed recordkeeping violations; in aggravation, the attorney had prior discipline, including a censure and two reprimands).

Likewise, for conduct involving dishonesty, fraud, deceit, or misrepresentation, the discipline typically ranges from a reprimand to a term of suspension, depending on the gravity of the offense, the presence of other unethical conduct, and aggravating or mitigating factors. See In re Mehta, 227 N.J. 53 (2016) (reprimand for an attorney who fabricated a letter to a former client and submitted it to disciplinary authorities, in violation of RPC 8.1(a) and RPC 8.4(c); in mitigation, the letter did not harm the client, the attorney had no prior discipline, and he readily admitted to misconduct by consenting to discipline), and In re Allen, 250 N.J. 113 (2022) (three-month suspension for an attorney who falsely represented to the OAE and to us that he had procured a settlement with a client, knowing he had not, in violation of RPC 3.3(a)(1) and RPC 8.4(c); the attorney also committed recordkeeping violations, failed to maintain required professional liability insurance, and failed to produce a number of records that the OAE had requested during its investigation; prior admonition and censure).

Ordinarily, the discipline imposed for the improper execution of jurats is an admonition or a reprimand. When the attorney witnesses and notarizes a document that has not been signed in the attorney's presence, but the document is signed by the proper party or the attorney reasonably believes it has been signed by the proper party, the discipline is usually an admonition. See In the

Matter of Nicholas V. DePalma, DRB 12-004 (February 17, 2012) (as a favor to another lawyer, the attorney signed a deed as the preparer, although the other lawyer had prepared it; he also affixed his jurat to the deed and affidavit of title outside the presence of the sellers and in the absence of their signatures; the sellers later signed the affidavit of title; violation of RPC 8.4(c); we took into consideration that the attorney had expressed remorse for his misconduct; that his actions were not born of venality but were, rather, a favor for a friend; that he had neither obtained personal gain nor received a fee; that no harm resulted to the sellers; that, at the time of the misconduct, he had been practicing law for twenty-four years, without incident; and that, since his misconduct, another thirteen years had passed before his retirement for medical reasons), and In the Matter of Gregory J. Spadea, DRB No. 10-151 (June 30, 2010) (the attorney affixed his jurat to several living will documents that had been signed outside of his presence).

If there are aggravating factors, such as the attorney committed other misconduct, involved another party in the misconduct, or has a disciplinary history, then the discipline generally is a reprimand. See In re Walrath, 257 N.J. 177 (2024) (in a companion matter, one attorney improperly notarized the signatures of four individuals even though he was not in the presence of any of the signatories; the other attorney, who did not affix a false jurat, received a reprimand for the remaining, similar misconduct involving a conflict of interest), and In re Bedell, 204 N.J. 596 (2011) (the attorney signed clients' names on individual releases and then affixed jurats to them in an attempt to legitimize the documents; the attorney also failed to communicate with the clients).

In our view, respondent's misconduct is most analogous to that of the attorney Alexander, who received a three-month suspension. Specifically, like the attorney in Alexander, respondent falsely notarized two sets of documents and subsequently lied about his misconduct. He withdrew his false narrative only when the Committee confronted him with the Forms he falsely had notarized. Worse, even after he recanted his prior misrepresentations, respondent appeared unable to appreciate his role in the misconduct and instead focused on Cuadrado's inability to gather proper signatures on the improperly notarized Forms.

Unlike the attorney in Alexander, who had no prior discipline in his twelve years at the bar, respondent, at the time of his misconduct, had been admitted to the New Jersey bar for approximately six months.

Thus, based on the foregoing disciplinary precedent, Alexender in particular, we conclude that respondent's misconduct could be met with a three-month suspension. To craft the appropriate discipline in this case, however, we also consider aggravating and mitigating factors.

In aggravation, respondent had multiple opportunities to be honest with the Committee but chose to deceive the Committee until he was cornered.

In mitigation, respondent stipulated to his misconduct underlying this matter. As the Court recently determined, disciplinary stipulations "serve a valuable role in the disciplinary process. They help streamline disputes and allow for matters to be resolved fairly and expeditiously." In re Acosta, 262 N.J. 129 (2025). Additionally, respondent's misconduct was not for personal gain.

We accord little weight – either in aggravation or in mitigation – to respondent's inexperience or lack of prior discipline. Although he had been recently admitted to the New Jersey bar at the time he committed his misconduct, as an attorney in New York, respondent affirmatively filed paperwork to become a notary public. Therefore, we do not find respondent's disciplinary history a compelling factor that would warrant either an enhancement or a downward departure from the baseline discipline.

Conclusion

On balance, weighing respondent's misconduct against the aggravating and mitigating factors, we determine that a three-month suspension is the appropriate quantum of discipline necessary to protect the public and preserve confidence in the bar.

Vice-Chair Boyer and Member Rodriguez voted to impose a censure.

Members Hoberman and Modu 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 Anthony Sosa
Docket No. DRB 25-253

Argued: January 15, 2026

Decided: March 30, 2026

Disposition: Three-Month Suspension

Members	Three-Month Suspension	Censure	Absent
Cuff	X		
Boyer		X	
Campelo	X		
Hoberman			X
Menaker	X		
Modu			X
Petrou	X		
Rodriguez		X	
Spencer	X		
Total:	5	2	2

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