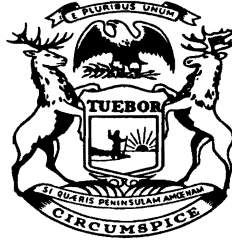


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**NOTICE OF REPRIMAND**  
**(By Consent)**

Case No. 12-94-GA

**Notice Issued: January 21, 2013**

Sean K. Kowalski, P 43764, Hamtramck, Michigan, by the Attorney Discipline Board Tri-County Hearing Panel #28.

1. Reprimand
2. Effective December 29, 2012

The respondent and the Grievance Administrator submitted a stipulation for consent order of discipline in accordance with MCR 9.115(F)(5). The stipulation was approved by the Attorney Grievance Commission and was accepted by the hearing panel. The stipulation contains respondent's plea of no contest to the allegations that he committed professional misconduct by failing to treat a person involved in the legal process with courtesy and respect, in violation of MRPC 6.5(a); and by engaging in conduct which exposed the legal profession or the courts to obloquy, contempt, censure, or reproach, in violation of MCR 9.104(2).

The stipulation was approved by the hearing panel and, in accordance with the agreement of the parties, the panel ordered that the respondent be reprimanded. Costs were assessed in the amount of \$775.15.

  
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John F. Van Bolt

Dated: **JAN 21 2013**