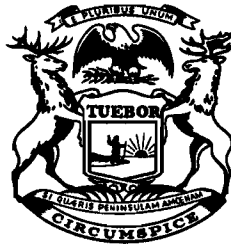


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NOTICE OF REPRIMAND
(By Consent)

Case No. 18-71-GA

Notice Issued: October 31, 2019

David E. Christensen, P 45374, Southfield, Michigan, by the Attorney Discipline Board Tri-County Hearing Panel #4.

Reprimand, Effective April 26, 2019

The respondent and the Grievance Administrator filed a Stipulation for Consent Order of Discipline, in accordance with MCR 9.115(F)(5), which was approved by the Attorney Grievance Commission and accepted by the hearing panel. The stipulation contained respondent's admissions to the allegations that he committed acts of professional misconduct after entering into an Independent Contractor Agreement with Michigan Auto Law when he handled cases through his own professional corporation where the clients had already entered into contingent fee agreements with Michigan Auto Law, and respondent failed to enter into a new contingent fee agreement with the client. Respondent also failed to explain to the client the distinction that his own professional corporation was handling the case, as opposed to Michigan Auto Law.

In the stipulation, the parties agreed that respondent believed he had the right to represent the clients through his own professional corporation, but he was negligent when he failed to recognize that he should notify his clients of the change and enter into a new contingent fee agreement which identified his professional corporation as the firm handling the case with his clients. No clients complained about this conduct or reported injury as a result of the conduct, but the potential for injury existed.

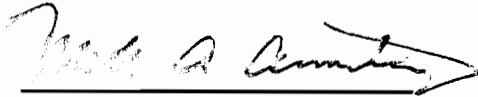
Based upon respondent's admissions and the stipulation of the parties, the panel found that respondent failed to explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation, in violation of MRPC 1.4(b); and failed to enter into a written contingent fee agreement with the proper parties, in violation of MRPC 1.5(c). Respondent was also found to have violated MCR 9.104(2); and MRPC 8.4(a).

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October 30, 2019

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In accordance with the stipulation of the parties, the panel ordered that respondent be reprimanded. Complainant, Steven Gursten, filed a petition for review requesting that the Board reject the stipulation and increase the discipline imposed from a reprimand to a suspension. Upon review, the Board affirmed the decision of the hearing panel. Costs were assessed in the amount of \$1,667.83.

A handwritten signature in cursive script, appearing to read "Mark A. Armitage", written over a horizontal line that ends in a right-pointing arrowhead.

Mark A. Armitage
Executive Director