

**JONATHAN KEAVENY**  
**Public Reprimand No. 2019-12**

**Order (public reprimand) entered by the Board on October 10, 2019.**

**SUMMARY<sup>1</sup>**

The respondent received a public reprimand for violations of IOLTA account record-keeping requirements and failure to cooperate with bar counsel's investigation. This matter came to bar counsel's attention as the result of a dishonored check.

Between June 1, 2017 and January 1, 2019, the respondent's IOLTA account was not properly reconciled every sixty days and the check register was not in chronological order with client identifiers for every transaction and a running balance. He also did not maintain individual client ledgers or a ledger for his funds held in the IOLTA account for anticipated bank fees. By January 1, 2019, after bar counsel initiated an investigation, the respondent brought his IOLTA account records into compliance with Mass. R. Prof. C. 1.15.

After receiving notice of the dishonored check, bar counsel requested certain information and documentation from the respondent, but he failed to comply on five separate occasions. As a result, the respondent was administratively suspended by the Supreme Judicial Court on October 4, 2018 for failure to respond to bar counsel's request for information during an investigation. The respondent complied with bar counsel's requests for information and was reinstated within thirty days.

The respondent's failure to respond to bar counsel's requests for information during an investigation violated Mass. R. Prof. C. 8.1(b) and 8.4(g). The respondent's failure to perform a three-way reconciliation of his IOLTA e account violated Mass. R. Prof. C. 1.15(f)(1)(E). The respondent's failure to maintain a chronological check register with client identifiers for every transaction and a running balance violated Mass. R. Prof. C. 1.15(f)(1)(B). The respondent's failure to keep individual client matter ledgers violated Mass. R. Prof. C. 1.15(f)(1)(C). The respondent's failure to keep a ledger for bank fees and charges with a list of every transaction and running balance violated Mass. R. Prof. C. 1.15(f)(1)(D).

On June 28, 2019, bar counsel and the respondent filed a stipulation in which the parties agreed that the appropriate sanction for the respondent's misconduct was a public reprimand. On July 8, 2019, the Board of Bar Overseers voted to sanction the respondent by public reprimand.

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<sup>1</sup> Complied by the Board of Bar Overseers based on the record of proceedings before the board.

