STATE OF MICHIGAN

Attorney Discipline Board

In the Matter of the Reinstatement Petition
of PETER T. HOWE, P 57973,

Case No. 25-82-RP

Petitioner/Appellant,
_________________________________/

ORDER AFFIRMING HEARING PANEL ORDER
DENYING PETITION FOR REINSTATEMENT

Issued by the Attorney Discipline Board
333 W. Fort St., Ste. 1700, Detroit, MI

Emmet County Hearing Panel #54 of the Attorney Discipline Board entered an order in this matter on March 4, 2026, denying petitioner's petition for reinstatement. Petitioner sought review of that decision by the Attorney Discipline Board in accordance with MCR 9.118. The Board has conducted review proceedings, including review of the record before the panel and consideration of the briefs and arguments presented by the parties at a review hearing held before the Board on May 13, 2026. For the following reasons, we affirm the hearing panel's order denying petitioner's petition for reinstatement.

Petitioner was previously the subject of two disciplinary matters arising from his deliberate misappropriation of settlement funds from two clients, one in Michigan and one in Illinois. After pleading guilty in 2011 to felony larceny by conversion in Michigan, petitioner's law license was suspended, and a hearing panel initially imposed a two-and-a-half-year suspension. The Grievance Administrator later discovered that petitioner had been disbarred in Illinois and initiated reciprocal discipline proceedings.[1] The matters were consolidated, and in 2012 the parties stipulated to petitioner's disbarment. A hearing panel entered an order disbarring petitioner from the practice of law in Michigan, effective March 9, 2011 (the date of his felony conviction), and the prior suspension order was vacated. See *Grievance Administrator v Peter T. Howe*, 11-37-AI; 11-52-JC and *Grievance Administrator v Peter T. Howe*, 12-22-RD.

Petitioner has filed three petitions for reinstatement since his disbarment. His first petition, filed in 2019, resulted in Tri-County Hearing Panel #66 finding him eligible for reinstatement with conditions. However, on review, the Board reversed that decision and denied reinstatement in 2021, concluding that petitioner failed to establish rehabilitation, particularly in light of his substantial unpaid debts to the IRS and the Illinois Client Protection Program. *In the Matter of the Reinstatement Petition of Peter T. Howe,* 19-77-RP.

Petitioner filed a second petition in 2022. After hearing testimony, Tri-County Hearing Panel #54 denied petitioner's petition for reinstatement, finding that petitioner's circumstances and evidence were largely unchanged from the prior proceeding. The panel emphasized petitioner's continued failure to meaningfully address his debts, his lack of effort to obtain non-legal

---

[1] On September 20, 2011, an order was entered in the Supreme Court of Illinois granting petitioner's motion that his name be stricken from the role of attorneys licensed to practice law in Illinois.

employment, and his decision to use available funds for personal expenses instead of repayment obligations. On review, the Board affirmed the hearing panel's denial in 2023, concluding that petitioner had failed to demonstrate the "moral rehabilitation" required for reinstatement following the intentional misuse of client funds. *In the Matter of the Reinstatement Petition of Peter T. Howe,* 22-23-RP.

Petitioner filed the instant, third petition for reinstatement on September 22, 2025. After hearing testimony, the panel concluded that petitioner did not establish, by clear and convincing evidence, the factors set forth in MCR 9.123(B)(1), (5), (6), and (7).[2]

With respect to good faith under (B)(1), the panel determined that although petitioner expressed a desire to be reinstated, his conduct did not reflect a genuine commitment to rehabilitation. The panel noted that petitioner failed to meaningfully address the primary obstacle to reinstatement – his longstanding pattern of financial misconduct. Despite substantial income and assets obtained after his disbarment, petitioner repeatedly chose not to repay major debts to the IRS and the Illinois Client Protection Program, and instead continued to spend beyond his means. Efforts to address these debts were minimal and made only shortly before his latest reinstatement petition was filed.

Under (B)(5) and (6), the panel found that petitioner's post-disbarment conduct was not exemplary and demonstrated a lack of understanding of professional obligations. This included filing a lawsuit against the State Bar and the Attorney Discipline Board he should have known was legally meritless, sending inappropriate communications to the Grievance Administrator's counsel in 2023, and displaying poor judgment and demeanor during proceedings.

---

[2] MCR 9.123(B) provides, in relevant part:

> (B) Disbarment or Suspension More Than 179 Days. An attorney whose license to practice law has been revoked or suspended for more than 179 days is not eligible for reinstatement until the attorney has petitioned for reinstatement under MCR 9.124 and has established by clear and convincing evidence that:
>
> (1) he or she desires in good faith to be restored to the privilege of practicing law in Michigan;
>
> * * *
>
> (5) his or her conduct since the order of discipline has been exemplary and above reproach;
>
> (6) he or she has a proper understanding of and attitude toward the standards that are imposed on members of the bar and will conduct himself or herself in conformity with those standards;
>
> (7) taking into account all of the attorney's past conduct, including the nature of the misconduct which led to the revocation or suspension, he or she nevertheless can safely be recommended to the public, the courts, and the legal profession as a person fit to be consulted by others and to represent them and otherwise act in matters of trust and confidence, and in general to aid in the administration of justice as a member of the bar and as an officer of the court.

As to (B)(7), the panel concluded that petitioner could not be safely recommended to the public due to a pattern of dishonesty. The panel found that petitioner minimized his misconduct, inaccurately characterized his repayment of stolen funds, misrepresented facts about his finances and therapy, and withheld material information from employers. The panel found that petitioner's repeated misstatements and omissions reflected a continuing lack of candor and integrity.

The panel concluded that the record showed a consistent pattern of financial irresponsibility, dishonesty, and failure to accept responsibility. The panel also noted that, although repayment to the Michigan Client Protection Fund was not directly at issue, petitioner's failure to reimburse the Illinois fund further demonstrated disregard for his obligations. Based on the totality of the evidence, the panel unanimously concluded that petitioner failed to meet his burden and denied reinstatement.

On review, the Board must determine whether there is proper evidentiary support in the record to support the hearing panel's decision to grant or deny a petition for reinstatement. *In re McWhorter*, 449 Mich 130, 136; 534 NW2d 480 (1995). However, the granting or denial of a petition for reinstatement under MCR 9.123(B) involves "an element of subjective judgment" and the ultimate "discretionary question whether the Court is willing to present that person to the public as a counselor, member of the state bar, and officer of the court bearing the stamp of approval from this Court." *Grievance Administrator v August*, 438 Mich 296,311; 475 NW2d 256 (1991). See also *In re Reinstatement Petition of Keith J. Mitan*, 12-2-RP (ADB 2013). The burden of proof rests with petitioner to establish by clear and convincing evidence that he satisfies the requirements of MCR 9.123(B).

The record here supports each of the panel's conclusions with specific, consistent evidence. As to MCR 9.123(B)(2) and (3), there is no dispute that more than five years have passed since petitioner's disbarment and there has been no evidence that he has practiced or attempted to practice law during that period. With respect to MCR 9.123(B)(4), although petitioner has made some effort to pay previously assessed costs, he has not fully complied with prior orders requiring payment, leaving him short of full compliance despite partial efforts.[3]

The more significant deficiencies arise under MCR 9.123(B)(1), (5), (6), and (7). Regarding MCR 9.123(B)(1), the record shows that while petitioner expresses a desire to be reinstated, he has not demonstrated that this desire is held in good faith. Despite acknowledging significant debts, petitioner repeatedly failed to prioritize repayment, even when he had the financial ability to do so.[4]

---

[3] The Board previously approved a payment plan on October 24, 2025, allowing petitioner to pay $850.36 in costs through monthly installments of $75 beginning November 15, 2025, with a final payment due by October 15, 2026. However, after petitioner failed to make a required payment by March 15, 2026, a notice of default was issued, warning that the plan would be vacated if payment was not received by March 21, 2026, and that future late payments would result in immediate termination of the plan. Because no payment was made, the Board vacated the payment plan on April 9, 2026, and ordered that the remaining balance of $550.36 is still due.

[4] In each of his three petitions for reinstatement, petitioner has strongly maintained that he lacks the financial ability to satisfy his debts. The record, however, reflects that petitioner earned more than $400,000 in 2017, obtained a $160,000 home equity line of credit in 2018, received approximately $318,000 from the sale of property in 2021, and realized net proceeds exceeding $408,000 from the sale of a home in 2023. Despite having access to substantial funds at various times, petitioner made no meaningful effort to satisfy the obligations this Board had previously identified as a priority. His current financial difficulties do not alter the fact that, when he had the means to make payments, he chose not to direct those funds toward those debts.

As to MCR 9.123(B)(5) and (6), the evidence demonstrates that petitioner's conduct since disbarment has not been exemplary, nor does it reflect a proper understanding of the professional standards imposed on members of the bar. As indicated by the panel, petitioner filed a meritless lawsuit in 2024 against the State Bar of Michigan and the Attorney Discipline Board despite their clear immunity, later claiming that it was merely an "alternate pleading." (Tr 1/23/26, pp 99-101.) Additionally, petitioner's inflammatory 2023 email accusing disciplinary authorities of religious bias – to which petitioner later admitted was based solely on his anger towards the discipline system – further reflects a lack of professional judgment and decorum. (Tr 1/23/26, pp 109-112.)

Finally, under MCR 9.123(B)(7), the panel reasonably concluded that petitioner cannot be safely recommended to the public or the profession. His underlying misconduct involved two separate, intentional thefts of client funds in Michigan and Illinois, both substantial and criminal in nature. His characterization of these acts as a single "mistake" minimizes their seriousness and reflects a lack of candor.[5] The record also shows petitioner's continued dishonesty: in his petition for reinstatement, he misrepresented that he was in therapy when he was not (Tr 1/23/26, pp 68-69, 106-109); he failed to disclose that he was a beneficiary of a trust on his offer in compromise to the IRS (Tr 1/23/26, pp 66-68); he inaccurately claimed his IRS debt was satisfied by a nonexistent lien (Tr 1/23/26, pp 16-17, 64, 91-93); and he misled at least one employer by failing to disclose his disbarment. (Tr 1/23/26, p 81.) Even his assertion that he repaid the Michigan client he stole from "within days" omits the fact that he kept his client's funds for nine to ten months and repaid the client only once his misconduct was discovered. (Tr 1/23/26, pp 85-87.) Taken together, these facts demonstrate a pattern of misrepresentation and self-serving omissions.

In sum, the record supports the hearing panel's findings that petitioner has not meaningfully addressed his financial obligations, has not demonstrated rehabilitation or professional understanding, and continues to exhibit patterns of dishonesty and poor judgment. These failures support the panel's conclusion that he has not met his burden under MCR 9.123(B) and that reinstatement is not warranted.

Although petitioner expresses frustration with what he portrays as a circular problem – that he must repay his debts to be reinstated, yet cannot do so without reinstatement – that framing misses the point. We do not ask for perfection, but rather a genuine, good-faith, meaningful effort. Instead, petitioner's attempts to address his obligations have been minimal and, at times, strategically timed. Moreover, as the prior Board and panel decisions make clear, the issue is not merely the fact that petitioner has unpaid debts, but rather his failure to appreciate the seriousness of his misconduct and to demonstrate a meaningful change in character. The present record shows that these deficiencies still exist.

NOW THEREFORE,

IT IS ORDERED that the hearing panel's March 4, 2026 order denying petition for reinstatement is **AFFIRMED**.

IT IS FURTHER ORDERED that respondent shall, on or before **Wednesday, July 15, 2026**, pay costs in the amount of $2,552.35, consisting of costs assessed by the hearing panel in the amount of $2,386.35, and court reporting costs incurred by the Attorney Discipline Board in the

---

[5] Petitioner's apparent failure to appreciate the relevance of his Illinois disciplinary matter and the resulting debt owed to the Illinois Client Protection Program to his reinstatement proceedings in Michigan is concerning, particularly given that both disciplinary matters arose from his intentional misappropriation of client funds.

amount of $166.00 for the review proceedings conducted on May 13, 2026. Please refer to the attached cost payment instruction sheet for method and forms of payment accepted.

ATTORNEY DISCIPLINE BOARD

By: /s/ Alan Gershel, Chairperson

Dated: June 16, 2026

Board Members Alan Gershel, Peter A. Smit, Rev. Dr. Louis J. Prues, Jason M. Turkish, Andreas Sidiropoulos, M.D., Katie Stanley, Tish Vincent, and Kamilia Landrum concur in this decision.

Member Linda M. Orlans was absent and did not participate in this decision.