

SUPREME COURT OF OHIO

Disciplinary Counsel v. Juhola

2025-Ohio-5663 · No. 2025-0789 · Decided December 23, 2025

SUMMARY

The Supreme Court of Ohio held that Michael Duane Juhola committed professional-conduct violations by transferring funds from one ward’s guardianship account to other guardianship or client accounts without authorization and by making false or misleading representations to a probate court. The court imposed a two-year suspension from the practice of law, with 18 months stayed on the condition of no further misconduct. Upon reinstatement, Juhola must serve one year of monitored probation focused on the proper use and distribution of guardianship funds.

CASE DETAILS

COURT	Supreme Court of Ohio
WRITING FOR THE COURT	Per Curiam; Kennedy, C.J.; Fischer, J.; Hawkins, J.; Shanahan, J.; DeWine, J.; Deters, J.
JURISDICTION	Supreme Court of Ohio
DECIDED	December 23, 2025
DOCKET	2025-0789
DISPOSITION	other
PROCEDURAL POSTURE	Attorney-discipline proceeding on a certified report from the Board of Professional Conduct of the Supreme Court of Ohio.
STANDARD OF REVIEW	The Supreme Court independently reviewed the record and applicable precedent in determining the findings of misconduct and appropriate sanction.
PRECEDENTIAL VALUE	Published opinion of the Supreme Court of Ohio; precedential subject to formal revision and publication in the Ohio Official Reports.
PARTIES	Disciplinary Counsel v. Michael Duane Juhola

TOPICS

- guardianships
- guardianship accounting
- guardianship procedure
- conservatorship
- probate procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Juhola committed professional misconduct by making unauthorized transfers of funds from one ward's guardianship account for the benefit of other wards or clients and by making false or misleading statements to the probate court.
2. What sanction was appropriate for Juhola's misconduct in light of the unauthorized transfers, concealment, aggravating factors, mitigating factors, and sanctions imposed in comparable cases.

HOLDINGS

1. Juhola violated Prof.Cond.R. 3.3(a)(1), 8.4(c), 8.4(d), and 8.4(h) by making unauthorized transfers from Woelfel's guardianship account, concealing transactions in a probate accounting, and making false statements to a probate tribunal.
2. The appropriate sanction was a two-year suspension from the practice of law, with 18 months stayed on the condition that Juhola commit no further misconduct, followed by one year of monitored probation beginning with his first appointment as a guardian after reinstatement.

KEY QUOTATIONS

“Despite his claimed good intentions, his actions violated his primary duty as the guardian of Woelfel’s estate—to manage the estate in Woelfel’s best interests.” (¶ 29)

“Therefore, we find that the appropriate sanction for Juhola’s misconduct is a two-year suspension with 18 months stayed on the condition that Juhola commit no further misconduct.” (¶ 33)

“If Juhola violates the condition of the stay, the stay will be lifted and he will serve the entire two-year suspension.” (¶ 34)

FACTUAL BACKGROUND

Juhola, an Ohio attorney who primarily handled probate matters, served as guardian for Bradford Woelfel and Todd McDaniel and as conservator and later financial attorney-in-fact for Cyle Adam Jarvis. Without probate-court authorization, he transferred \$25,000 from Woelfel's account to pay McDaniel's assisted-living expenses and later transferred \$70,000 from Woelfel's account to help fund Jarvis's condominium purchase. Although the funds were eventually restored, Juhola omitted the McDaniel transactions from a probate accounting and initially denied making other transfers from a client's account when questioned by a probate magistrate.

PROCEDURAL HISTORY

Disciplinary counsel charged Juhola with misconduct arising from three unauthorized transfers of funds from one ward's guardianship account to other guardianship or client accounts. The parties stipulated to facts, misconduct, and mitigating factors, and a Board of Professional Conduct panel found the violations by clear and convincing evidence. The board adopted the panel's recommendation of a six-month suspension followed by one

year of monitoring, but the Supreme Court independently reviewed the record and imposed a two-year suspension with 18 months stayed and one year of monitored probation.

DISPOSITION

other

CASES CITED

- In re Guardianship of Woelfel, Franklin P.C. No. 585422
- In re Guardianship of McDaniel, Franklin P.C. No. 599936
- In re Conservatorship of Jarvis, Franklin P.C. No. 546296
- Disciplinary Counsel v. Bricker, 2013-Ohio-3998, ¶ 21
- Cleveland Bar Assn. v. Dixon, 2002-Ohio-2490
- Disciplinary Counsel v. Thomas, 2016-Ohio-1582
- Disciplinary Counsel v. Blair, 2011-Ohio-767
- Disciplinary Counsel v. Jancura, 2022-Ohio-3189, ¶¶ 18-19, 21, 27
- Disciplinary Counsel v. Gorby, 2015-Ohio-476, ¶¶ 15, 28
- Disciplinary Counsel v. Burchinal, 2012-Ohio-3882, ¶ 17
- Disciplinary Counsel v. Edwards, 2012-Ohio-5643, ¶ 18
- Disciplinary Counsel v. Fowerbaugh, 1995-Ohio-261, syllabus
- Disciplinary Counsel v. Markijohn, 2003-Ohio-4129, ¶ 8
- Dayton Bar Assn. v. Kinney, 2000-Ohio-445

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