

SUPREME COURT OF OHIO

Disciplinary Counsel v. Henderson Carter

2026-Ohio-489 · No. 2025-1329 · Decided February 17, 2026

SUMMARY

The Supreme Court of Ohio held that Pippa Lynn Henderson Carter, a former attorney who had been permanently disbarred, engaged in five acts of the unauthorized practice of law. The acts involved holding herself out as an attorney in a probate matter, preparing two quitclaim deeds, and notarizing the deeds as an attorney. The court enjoined her from further unauthorized practice and notarial acts absent proper appointment and commissioning, and imposed a \$30,000 civil penalty.

CASE DETAILS

COURT	Supreme Court of Ohio
WRITING FOR THE COURT	Per Curiam; Chief Justice Kennedy; Justice Fischer; Justice DeWine; Justice Deters; Justice Hawkins; Justice Shanahan
JURISDICTION	Supreme Court of Ohio
DECIDED	February 17, 2026
DOCKET	2025-1329
DISPOSITION	other
PROCEDURAL POSTURE	Original unauthorized-practice-of-law proceeding on the final report of the Board on the Unauthorized Practice of Law. The respondent failed to answer the complaint or respond to the relator's motion for default.
STANDARD OF REVIEW	The Supreme Court of Ohio reviewed the record and adopted the board's findings and recommendations; the opinion states that the relator proved the violations by a preponderance of the evidence.
PRECEDENTIAL VALUE	Published
PARTIES	Disciplinary Counsel v. Pippa Lynn Henderson Carter

TOPICS

- probate procedure
- real estate
- equitable relief
- remedies
- administrative law

PRACTICE AREAS

- unauthorized practice of law
- professional discipline
- probate
- real estate
- remedies

QUESTIONS PRESENTED

1. Whether Henderson Carter engaged in the unauthorized practice of law by implicitly holding herself out as an attorney representing an interested person in a probate matter.
2. Whether preparing two quitclaim deeds for another constituted unauthorized practice of law.
3. Whether notarizing the deeds as an attorney while disbarred constituted separate acts of unauthorized practice of law.
4. Whether injunctions and a civil penalty were warranted, and what amount of civil penalty was appropriate.

HOLDINGS

1. Henderson Carter engaged in the unauthorized practice of law by implicitly holding herself out as an attorney representing John C. Patterson Jr. in the estate of Inez Patterson.
2. Henderson Carter engaged in two acts of unauthorized practice of law by preparing two quitclaim deeds on behalf of another.
3. Henderson Carter committed two additional acts of unauthorized practice of law by notarizing the deeds as an attorney when she was a former attorney who had been disbarred.
4. Injunctions prohibiting Henderson Carter from additional acts of unauthorized practice of law and from performing notarial acts unless properly appointed and commissioned were warranted.
5. A total civil penalty of \$30,000, consisting of \$6,000 for each of five acts of unauthorized practice, was warranted.

KEY QUOTATIONS

“We have defined the unauthorized practice of law as including both the “rendering of legal services for another,” Gov.Bar R. VII(31)(J)(1)(a) through (c), and the “[h]olding out to the public or otherwise representing oneself as authorized to practice law in Ohio” by any person who is not authorized to practice law under our rules, Gov.Bar R. VII(31)(J)(1)(d).” (¶ 18)

““[T]he practice of law embraces the preparation of legal documents on another’s behalf, including deeds which convey real property.”” (¶ 19)

“Accordingly, we enjoin Pippa Lynn Henderson Carter from engaging in additional acts constituting the unauthorized practice of law in Ohio. We also enjoin Henderson Carter from performing notarial acts in Ohio unless and until she is properly appointed and commissioned as a notary by the Ohio Secretary of State.” (¶ 27)

FACTUAL BACKGROUND

Henderson Carter, who had been permanently disbarred in 2006, contacted personnel associated with an estate and implicitly held herself out as an attorney representing an interested beneficiary. She prepared two quitclaim deeds transferring real property and notarized both deeds using a notary stamp identifying her as an attorney, despite no longer being authorized to practice law or act as an attorney-notary. She did not cooperate with the investigation or participate in the proceeding.

PROCEDURAL HISTORY

Disciplinary counsel filed and twice amended a complaint alleging that Henderson Carter engaged in the unauthorized practice of law. After service was deemed complete and Henderson Carter failed to respond, a three-member panel of the Board on the Unauthorized Practice of Law entered default findings, found five violations, and recommended injunctions and a \$30,000 civil penalty. The board adopted the panel's report, and the Supreme Court of Ohio reviewed and adopted the board's findings and recommendations.

DISPOSITION

other

CASES CITED

- Disciplinary Counsel v. Henderson, 78 Ohio St.3d 1501 (1997)
- Disciplinary Counsel v. Henderson, 80 Ohio St.3d 1461 (1997)
- Disciplinary Counsel v. Henderson, 1999-Ohio-29
- Disciplinary Counsel v. Henderson, 2006-Ohio-1336
- Disciplinary Counsel v. Henderson, 2009-Ohio-6700
- Royal Indemn. Co. v. J.C. Penney Co., Inc., 27 Ohio St.3d 31, 34 (1986)
- Greenspan v. Third Fed. S. & L. Assn., 2009-Ohio-3508, ¶ 16
- Cleveland Bar Assn. v. CompManagement, Inc., 2004-Ohio-6506, ¶ 40
- Ohio State Bar Assn. v. Cohen, 2005-Ohio-5980, ¶ 6
- Lorain Cty. Bar Assn. v. Kennedy, 2002-Ohio-1943, ¶ 3
- Disciplinary Counsel v. Doan, 1997-Ohio-299, ¶ 3
- Medina Cty. Bar Assn. v. Flickinger, 2002-Ohio-2483, ¶ 5
- Disciplinary Counsel v. Ward, 2018-Ohio-5083, ¶ 13