

THE STATE OF NEW HAMPSHIRE

SUPREME COURT

ORDER

LD-2025-0008, In the Matter of Christopher R. Burns, Esquire

On December 18, 2025, the Professional Conduct Committee (PCC) filed an order recommending the disbarment of the respondent, Attorney Christopher R. Burns. The PCC's order further recommended that the Attorney Disciplinary Office (ADO) "immediately pursue interim suspension . . . while the Supreme Court considers the matter." On December 19, 2025, the ADO filed a motion for the immediate suspension or disbarment of Attorney Burns pursuant to Supreme Court Rule 37(16)(d) and (f). On December 23, 2025, we suspended Attorney Burns on an immediate basis for the reasons set forth in the PCC's order and the ADO's motion.

In its order recommending disbarment, the PCC "adopt[ed] the Hearing Panel's analysis and conclusions" and further found as follows:

Attorney Burns committed serious misconduct. He immediately began converting a client's funds for his own uses without ever earning it, depleting the funds in nine days. He failed to represent the client in any meaningful way, let alone with a minimum amount of competence or diligence, and then submitted falsely notarized interrogatories to opposing counsel, lied to his client over a period of months, caused a default judgment with costs to be entered against the client, and failed to respond to the disciplinary authority. Attorney Burns lied to the Committee and showed no remorse.

By adopting the Hearing Panel's analysis and conclusions, the PCC found and ruled that Attorney Burns violated the following Rules of Professional Conduct, among others:

- (1) Rule 1.1, which requires an attorney to provide competent representation to a client.
- (2) Rule 1.3, which requires an attorney to act with reasonable diligence and promptness in representing a client.
- (3) Rule 1.4, which requires an attorney to keep the client reasonably informed about the status of the matter and to promptly comply with reasonable requests for information.

- (4) Rule 1.15, which sets forth requirements for the safekeeping of client property.
- (5) Rule 3.3, which requires candor toward the tribunal.
- (6) Rule 3.4, which states, among other things, that an attorney shall not “fail to make reasonably diligent effort to comply with a legally proper discovery request by an opposing party” in pretrial proceedings.
- (7) Rule 4.1, which provides that a lawyer shall not make a false statement of material fact or law to a third person, including to opposing counsel.
- (8) Rule 8.1(b), which provides that an attorney shall not knowingly fail to respond to a lawful demand for information from a disciplinary authority.
- (9) Rule 8.4(c), which states that an attorney commits professional misconduct when he engages in conduct involving dishonesty, fraud, deceit or misrepresentation.

Following the suspension order and the PCC’s filing of the record of the disciplinary proceedings, we issued a procedural order notifying the parties that they were required to identify any legal or factual issues concerning the PCC’s disbarment recommendation that they wished this court to review. See Supreme Court Rule 37(16)(c). The ADO did not identify any such issues. Attorney Burns responded by raising the following issues: (1) his due process rights were violated as a result of his claimed nonreceipt of filings or notices during the disciplinary proceedings; (2) the attorney discipline system lacked “jurisdiction” over certain matters that he characterizes as a mere “fee dispute” with the client; (3) “res judicata and/or issue preclusion” barred consideration of his noncompliance with trust accounting requirements; and (4) the PCC overlooked a “mitigating factor[]” — his operation of a supervised visitation center in Dover for over a decade. Having reviewed Attorney Burns’s response, we agree with the ADO that briefing is unnecessary because “this Court may address the legal and factual issues raised by the Respondent on the record before [us].”

In attorney discipline cases, we defer to the PCC’s factual findings if supported by the record, but retain ultimate authority to determine whether, on the facts found, a violation of the rules governing attorney conduct has occurred and, if so, the sanction. Salomon’s Case, 171 N.H. 694, 700 (2019). As a result of Attorney Burns’s default in failing to file an answer to the ADO’s notice of charges, the allegations set forth in the notice of charges were properly deemed to be admitted. See Supreme Court Rule 37A(III)(b)(3)(A). Having considered the default and having reviewed the record, we conclude that there is ample

support for the PCC's findings that Attorney Burns violated the Rules of Professional Conduct set forth above, and we determine that disbarment is the appropriate sanction. See Salomon's Case, 171 N.H. at 700, 707.

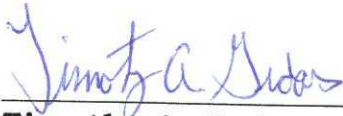
As a threshold matter, we note that Attorney Burns's response does not address many of the misconduct findings, including the most serious. See id. at 707 ("Because no single transgression reflects more negatively on the legal profession than a lie, attorney misconduct involving dishonesty justifies disbarment." (quotation omitted)). The issues that he does raise are without merit. As to the "due process" issue, Attorney Burns does not address Supreme Court Rule 42(XIV) and Rule 42E(c), which require an attorney to keep his address information current and accurate with the New Hampshire Bar Association and which allow the court and court-established committees to treat as binding notices sent to an address provided by the attorney to the New Hampshire Bar Association. The characterization of the matter as a "fee dispute" is refuted by the factual findings of the PCC. The "res judicata and/or issue preclusion" issue is not explained at all, and we fail to see the relevance or applicability of either preclusion doctrine here. Finally, even if we assume, without deciding, that Attorney Burns's operation of a supervised visitation center qualifies as a mitigating factor, the aggravating factors substantially outweigh that one mitigating factor. See Salomon's Case, 171 N.H. at 707-08. The PCC found "numerous" aggravating factors, including "dishonest or selfish motive, a pattern of misconduct, multiple offenses, bad faith obstruction of the disciplinary proceedings, and substantial experience in the practice of law."

THEREFORE, the court orders that Christopher R. Burns be disbarred from the practice of law in New Hampshire. He is hereby assessed all costs and expenses incurred by the attorney discipline system in the investigation and prosecution of the matter.

MacDonald, C.J., and Donovan, Countway, Gould, and Will, JJ., concurred.

DATE: May 13, 2026

ATTEST:



Timothy A. Gudas, Clerk

Distribution:

New Hampshire Professional Conduct Committee, #24-014

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File