

The Supreme Court of the State of Louisiana

IN RE: CHRISTOPHER ANTONIO TYSON

No. 2025-B-00678

IN RE: Office of Disciplinary Counsel - Applicant Other; Notice of Discipline in
Another Jurisdiction Pursuant to Rule XIX, Section 21 and Motion to Initiate
Reciprocal Discipline Proceedings;

September 10, 2025

Reciprocal discipline imposed. See per curiam.

CRC

JLW

JDH

WJC

JBM

PDG

JMG

Supreme Court of Louisiana

September 10, 2025



Chief Deputy Clerk of Court
For the Court

SUPREME COURT OF LOUISIANA

NO. 2025-B-0678

IN RE: CHRISTOPHER ANTONIO TYSON

ATTORNEY DISCIPLINARY PROCEEDING

PER CURIAM

This matter arises from a Petition to Initiate Reciprocal Discipline Proceedings filed by the Office of Disciplinary Counsel (“ODC”) against respondent, Christopher Antonio Tyson, an attorney licensed to practice law in Louisiana and Georgia, based upon discipline imposed by the Supreme Court of Georgia.

UNDERLYING FACTS AND PROCEDURAL HISTORY

Respondent filed a petition for voluntary discipline with the Supreme Court of Georgia, admitting that he had committed misconduct by mishandling client funds during his representation of a plaintiff in a personal injury lawsuit. Specifically, respondent admitted that he settled his client’s case in November 2020 for \$6,300.00. Upon receiving the settlement check, respondent deposited the check into his client trust account. Respondent notified the client of the receipt of funds; however, he did not notify a chiropractor from whom the client sought treatment and who had an interest in any settlement funds in the matter. Respondent paid a lien for medical benefits on behalf of the client, but did not promptly disburse the settlement funds owed to his client or the chiropractor. Respondent also failed to maintain sufficient funds in his client trust account and used client trust account funds for personal expenses.

For the above misconduct, respondent filed a petition for voluntary discipline with the Supreme Court of Georgia, wherein respondent stipulated that he violated the Georgia Rules of Professional Conduct. Specifically, respondent stipulated that he violated Rules 1.15 (I)(a) by failing to safeguard the settlement funds owed to the client and the chiropractor in his IOLTA account, 1.15 (I)(b) by disregarding the chiropractor's interest in the funds from the settlement, 1.15 (I)(c) by failing to promptly notify the chiropractor of the receipt of the settlement and failing to promptly disburse the funds owed to the client and the chiropractor, and 1.15 (II)(b) by withdrawing from the IOLTA account unearned funds for personal use. For his misconduct, respondent proposed that he be suspended from the practice of law for six months. However, the Supreme Court of Georgia rejected the petition, finding that a six-month suspension was insufficient based on the facts of the case and in light of respondent's failure to pay restitution and prior disciplinary history (a 2013 private reprimand). *See In the Matter of Tyson*, 319 Ga. 527, 904 S.E. 2d 503 (2024).

Respondent then filed an amended petition for voluntary discipline, seeking a one-to-two-year suspension contingent upon his restitution in attorney fees to his former client. In his amended petition, respondent admitted that out of the \$6,300.00 settlement, he paid \$1,227.47 to satisfy an ERISA lien, \$2,100.00 to the client, and \$2,100.00 to the chiropractor. Respondent included with his amended petition a copy of said payments and correspondence from the client's chiropractor stating he is satisfied with his portion of the settlement proceeds. Respondent admitted that he disbursed the remaining \$872.53 to himself for attorney fees.

On February 18, 2025, the Supreme Court of Georgia accepted the amended petition and suspended respondent from the practice of law for two years, with his reinstatement conditioned upon respondent providing restitution in the amount of \$872.53 to his former client and upon the successful completion of the terms and

conditions to lift his administrative suspension. *In the Matter of Tyson*, 321 Ga. 64, 912 S.E. 2d 637 (2025).

After receiving respondent's self-report of the Georgia order of discipline, the ODC filed a motion to initiate reciprocal discipline proceedings in Louisiana, pursuant to Supreme Court Rule XIX, § 21. A copy of the decision issued by the Supreme Court of Georgia was attached to the motion. On May 29, 2025, this court rendered an order giving respondent thirty days to demonstrate why the imposition of identical discipline in this state would be unwarranted.

Respondent filed an answer to this court, admitting all of the statements made in the petition.

DISCUSSION

The standard for imposition of discipline on a reciprocal basis is set forth in Supreme Court Rule XIX, § 21(D). That rule provides:

Discipline to be Imposed. Upon the expiration of thirty days from service of the notice pursuant to the provisions of paragraph B, this court shall impose the identical discipline ... unless disciplinary counsel or the lawyer demonstrates, or this court finds that it clearly appears upon the face of the record from which the discipline is predicated, that:

- (1) The procedure was so lacking in notice or opportunity to be heard as to constitute a deprivation of due process; or
- (2) Based on the record created by the jurisdiction that imposed the discipline, there was such infirmity of proof establishing the misconduct as to give rise to the clear conviction that the court could not, consistent with its duty, accept as final the conclusion on that subject; or
- (3) The imposition of the same discipline by the court would result in grave injustice or be offensive to the public policy of the jurisdiction; or
- (4) The misconduct established warrants substantially different discipline in this state; ...

If this court determines that any of those elements exists, this court shall enter such other order as it deems

appropriate. The burden is on the party seeking different discipline in this jurisdiction to demonstrate that the imposition of the same discipline is not appropriate.

In the instant case, respondent has made no showing of infirmities in the Georgia proceeding, nor do we discern any from our review of the record. Furthermore, we feel there is no reason to deviate from the sanction imposed in Georgia as only under **extraordinary circumstances** should there be a significant variance from the sanction imposed by the other jurisdiction. *In re: Aulston*, 05-1546 (La. 1/13/06), 918 So. 2d 461. *See also In re Zdravkovich*, 831 A. 2d 964, 968-69 (D.C. 2003) (“there is merit in according deference, for its own sake, to the actions of other jurisdictions with respect to the attorneys over whom we share supervisory authority”).

Under these circumstances, we believe it is appropriate to defer to the Georgia judgment imposing discipline upon respondent. Accordingly, we will impose reciprocal discipline in the form of a two-year suspension, subject to the conditions set forth by the Supreme Court of Georgia in its order imposing discipline.

DECREE

Considering the Petition to Initiate Reciprocal Discipline Proceedings filed by the Office of Disciplinary Counsel and the record filed herein, it is ordered that respondent, Christopher Antonio Tyson, Louisiana Bar Roll number 28249, be and he hereby is suspended from the practice of law for two years, governed by the conditions set forth by the Supreme Court of Georgia in its order imposing discipline in *In the Matter of Tyson*, 321 Ga. 64, 912 S.E. 2d 637 (2025).