

VIRGINIA:

IN THE IN THE CIRCUIT COURT OF THE CITY OF RICHMOND

**VIRGINIA STATE BAR EX REL.
THIRD DISTRICT, SECTION I COMMITTEE
VSB DOCKET NO. 25-031-134547**

Complainant,

v.

Case No. CL26-2173

PAUL CHRISTOPHER GALANIDES

Respondent.

AGREED DISPOSITION MEMORANDUM ORDER
THREE-MONTH SUSPENSION WITH TERM

This matter came to be heard on July 16, 2026, before a Circuit Court Three-Judge panel, upon the joint request of the parties for the Court to accept the Agreed Disposition for a Three-Month Suspension with Term endorsed by the parties and offered to the Court as provided by the Rules of the Supreme Court of Virginia. The panel consisted of the Honorable Tasha D. Scott, Judge of the Fourth Judicial Circuit, Designated Chief Judge; the Honorable Robert H. Morrison, Judge of the Tenth Judicial Circuit; and the Honorable Rebecca J. Wade, Judge of the Eighteenth Judicial Circuit. Paul Christopher Galanides, Respondent, was present and was represented by counsel Jeffrey Hamilton Geiger. The Virginia State Bar appeared through its Bar Counsel Renu M. Brennan. The Chief Judge polled the members of the panel as to whether any of them were aware of any personal or financial interest or bias which would preclude any of them from fairly hearing the matter to which each judge responded in the negative. Court Reporter Lisa Wright of Chandler and Halasz Stenographic Reporters, P. O. Box 1975, Mechanicsville, VA 23116,

telephone 804-730-1222, after being duly sworn, reported the hearing and transcribed the proceedings.

WHEREFORE, upon consideration of the Agreed Disposition, the Certification, Respondent's Answer, the certification regarding Respondent's disciplinary record, the arguments of the parties, and after due deliberation,

It is **ORDERED** that the Circuit Court accepts the Agreed Disposition, and the Respondent shall receive a sanction of a Three-Month Suspension with Term. The Agreed Disposition is attached to and incorporated in this Memorandum Order.

It is further **ORDERED** that the sanction is effective the close of business on July 24, 2026.

The Clerk of the Disciplinary System shall assess costs pursuant to ¶13-9 E. of the Rules.

A copy teste of this Order shall be mailed to Paul Christopher Galanides, Respondent, at his last address of record with the Virginia State Bar, Law Office of Paul C. Galanides PC, 1561 E. Main Street, Richmond, Virginia 23219; with an attested copy to Renu M. Brennan, Bar Counsel, Virginia State Bar, 1111 East Main Street, Suite 700, Richmond, VA 23219-0026; to Jeffrey Hamilton Geiger, Respondent's Counsel, at Sands Anderson, PC, 919 E. Main Street, Suite 2300, P.O. Box 1998, Richmond, Virginia 23218-1998; and to the Clerk of the Disciplinary System, Virginia State Bar, 1111 East Main Street, Suite 700, Richmond, Virginia 23219-0026.

ENTERED THIS _____ DAY OF JULY, 2026.



Tasha D Scott, Judge
July 17, 2026

The Honorable Tasha D. Scott
Chief Judge Designate

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Respondent.

**AGREED DISPOSITION
THREE- MONTH SUSPENSION WITH TERM**

Pursuant to the Rules of the Supreme Court of Virginia, Part 6, Section IV, Paragraph 13-6.H, the Virginia State Bar, by Renu M. Brenna, Bar Counsel, and Paul Christopher Galanides, Respondent, and Jeffrey Hamilton Geiger, Respondent's counsel, hereby enter into the following Agreed Disposition for a Three-Month Suspension with a Term arising out of the referenced matter.

I. STIPULATIONS OF FACT

1. Respondent was admitted to the Virginia State Bar ("VSB") in 2000. At all relevant times, Respondent has been licensed and in good standing.
2. On March 5, 2023, Respondent agreed to represent David Clarke Tucker, Jr. "on appeal to the Va. Court of Appeals and Va. Supreme Court, from the Prince William Circuit Court convictions (sentencing anticipated March 16)." Tucker was tried by a jury on January 3 and 4, 2023, and convicted of possession of a firearm as a violent felon. By final order entered April 13, 2023, the Prince William Circuit Court ("trial court")

sentenced Tucker to five years of incarceration and three years of post-release supervision.

3. Respondent's fee agreement stated as follows:

Fee Agreement

I, Jaida Wright (payor) wish to retain the Law Office of Paul C. Galanides, P.C. (attorney) to represent David Clarke Tucker Jr. on appeal to the Va. Court of Appeals and Va. Supreme Court, from the Prince William County Circuit Court convictions (sentencing anticipated March 16). The attorney agrees to personally handle this matter with appropriate diligence but makes no promise of any particular outcome.

The Representation Fee to perfect the appeal process in the Court of Appeals and the Supreme Court of Virginia is \$10,000.00. This agreement does not include appeal bond hearings in the circuit court or filing costs (\$50 each appellate court). Formal pleadings to the appellate courts must be filed via a publisher, and the payor agrees that publishing costs belong to the payor. The attorney anticipates at least one brief to be filed at an expense of approximately \$635. Payments made by credit card carry a 5% processing fee, otherwise this is a flat fee case except as described above. Failure to pay the second half of attorney's representation fee may be grounds for the Attorney to move to withdraw from the case after the Court of Appeals level.

Client funds paid prior to being earned are retained in the attorney's Client Trust Account. The Representation Fee is earned by the filing of the Appellant's Opening Brief in the Court of Appeals. This fee agreement includes filing of a timely and proper Notice of Appeal, filing of the transcripts, filing Assignments of Error, and Opening Brief of the Appellant, appearing for oral argument before a panel of the Court of Appeals, and if appropriate, filing a Motion to Reconsider / Rehear En Banc, in the Court of Appeals. It also includes filing of a timely and proper Notice of Appeal in the Supreme Court of Virginia, a Petition for Appeal, an Opening Brief of the Appellant if an appeal is granted, and appearing for oral argument if an appeal is granted, and a Motion to Reconsider if appropriate.

<u>s/ Paul C. Galanides</u>	<u>3-5-23</u>
Paul C. Galanides	date

<u>Jaida Wright</u>	<u> </u>
	date

(Agreement not active until Attorney has been retained. Retainer requires payment of one-half of Representation Fee. Click and Pay payments for less than half of the Representation Fee may be returned and do not retain the attorney's services.)

4. By email dated March 5, 2023, to Jaida Wright, Tucker's former fiancée, Respondent attached his fee agreement to represent Tucker and asked Ms. Wright to reply indicating that she accepted the terms or to return a signed copy.
5. By email dated March 7, 2023, Ms. Wright accepted the terms of the agreement.
6. On March 7, 2023, Ms. Wright paid Respondent \$5,000, one-half of his advanced legal fee.
7. On March 17, 2023, Respondent moved the trial court to relieve appointed counsel and substitute in as Tucker's retained counsel on Tucker's criminal appeal.
8. On April 13, 2023, Ms. Wright paid Respondent the remaining \$5,000 of his \$10,000 advanced legal fee.
9. On May 13, 2023, Respondent served the Notice of Appeal on all required parties and electronically submitted it to the Clerk of the Court of Appeals of Virginia. The Notice of Appeal was filed in the trial court on Monday, May 15, 2023. Respondent noted in the Notice of Appeal that the following transcripts would be filed: (1) motion to suppress hearing on December 20, 2022; (2) the jury trial of January 3 and 4, 2023; and (3) the sentencing hearing on March 16, 2023.
10. By email dated May 17, 2023, the trial court requested the court reporter prepare the transcripts.
11. The deadline to file transcripts necessary for consideration of the appeal was June 12, 2023.
12. Respondent did not request an extension of time to file the transcripts.
13. The transcripts for all hearings except the first day of trial, January 3, 2023, were timely filed on June 5 and 12, 2023 respectively.

14. Respondent did not submit a written statement of facts as to what occurred on the first day of trial.
15. The transcript for the first day of the trial, January 3, 2023, was not filed until July 5, 2023, after the filing deadline, which had not been extended, expired.
16. On September 6, 2023, Respondent filed the opening brief with the Court of Appeals of Virginia. Respondent argued that (1) the trial court erred in denying Tucker's motion to suppress the evidence gathered following the warrantless entry into Tucker's sister's residence ("motion to suppress") and (2) the evidence was insufficient to support his conviction ("insufficiency of the evidence").
17. On September 7, 2023, Respondent disbursed the full advanced legal fee as follows:
\$9,400 to himself and \$600 to the company who printed the appellate brief.
18. By order entered February 1, 2024, the Court of Appeals of Virginia affirmed Tucker's conviction. The Court of Appeals of Virginia affirmed the motion to suppress on the merits. The Court of Appeals of Virginia ruled that it could not address the merits of the sufficiency of the evidence argument because the transcript of the first day of trial, which was not timely filed, was indispensable to address the insufficiency of the evidence argument.
19. By email dated February 1, 2024, Respondent provided Ms. Wright with the Court of Appeals of Virginia's February 1, 2024 order dismissing Tucker's appeal to Ms. Wright.

On Feb 1, 2024, at 5:50 PM, Paul Galanides <Paul@vadefensecounsel.com> wrote:

Jaida. I am sorry to report there were problems. The Court of Appeals denied the appeal today. I am attaching the decision. They only considered one argument because they say the transcript was filed late for day 1 of trial. Let me do a bit more review and I will let you know what our best option is. Thanks.

Paul C. Galanides, Esq.
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1561 East Main St.
Richmond, Virginia 23219
www.VaDefenseCounsel.com
(804) 716-4299 tel.
(804) 716-4595 fax.

20. By response email through Ms. Wright on February 2, 2024, Mr. Tucker asked

Respondent about the remedy for the dismissal of the appeal based on the failure to timely file the transcript.

From: Jaida Wright
Sent: Friday, February 02, 2024 12:40 PM
To: Paul Galanides <Paul@vadefensecounsel.com>
Cc: Kara <kara@vadefensecounsel.com>
Subject: Re:

Good afternoon,

Here is a message from David, can you please respond to the best of your ability thank you

Dear Mr. Galanides, I received the denial of the appeal due to the lack of transcripts in a timely manner but I don't understand if that was an error on the court's behalf getting the transcripts to us in the beginning. I remember them prolonging getting them to us.

But why wouldn't they allow your argument?

Either way, it's just a bump in the road and I am not giving up.

I've been in the law library researching things for myself so is there anyway you can petition for a rehearing on the grounds that we received the transcripts late?

Or can we seek further review in the supreme court?

I know that has to be done within 30 days of the final decision in the court of appeals, so March 1st would be our deadline.

Please contact me back on how you feel we shall proceed moving forward.

21. By email dated February 2, 2024, Respondent said in part, "I am happy to file for both a re-hearing and a petition for appeal in the Virginia Supreme Court if you're willing to have me keep working on the appeal." As follows is Respondent's full email:

On Feb 2, 2024, at 1:12 PM, Paul Galanides <Paul@vadefensecounsel.com> wrote:

Dear Jaida and David, I was very disappointed to see the Court's order yesterday. I had no idea one of the transcripts was late. They changed the Rules of Court in the past year or two and now the Court Clerk orders and pays for the transcripts when we file a Notice of Appeal. In the past, if the court reporter was going to be late filing, they would contact me. I don't know if the court reporter contacted the clerk, but I was unaware of any timing problem. It was quite difficult even being made counsel of record for the appeal instead of the public defender. The Court of Appeals has gotten very aggressive when it comes to finding reasons to dispose of appeals, probably because there has been a vast increase in the number of appeals filed. I am happy to file for both a re-hearing and a petition for appeal in the Virginia Supreme Court if you're willing to have me to keep working on the appeal. Some people might want to change attorneys because if the fault for the transcript issue is not the clerk's fault, they will say it was my fault for not monitoring the timing of the filing of the transcripts. Regardless of who dropped the ball, I am sorry that Court of Appeals gave us only a limited review.

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22. By email dated February 5, 2024, Tucker said that he could "see where the problem came in and now it's time to come up with a solution, so im willing to proceed with the re hearing and an appeal in the supreme court." Tucker's full email is as follows:

From Jaida Wright <jaidaw1995@gmail.com>

Date Mon 2/5/2024 6:17 PM

To Paul Galanides <Paul@vadefensecounsel.com>

External (jaidaw1995@gmail.com)

Report This Email - FAQ - GoDaddy Advanced Email Security. Powered by INKY

Good evening,

I know and understand that most would look at this and fight for ineffective counsel but my fiancé has given me the strength to keep fighting and not give up, so im not gonna blame you in this situation. I can see where the problem came in and now it's time to come up with a solution, so im willing to proceed with the re hearing and an appeal in the supreme court. Just please tell me that there is something we still can do and if it looks promising because i don't want to waste anyones time.

23. Respondent did not at any time communicate to Tucker, through Wright or otherwise, that he had the option of filing a delayed appeal in the Court of Appeals of Virginia pursuant to Va. Code § 19.2-321.1.¹ Va. Code § 19.2-321.1 permits the filing of a

¹ § 19.2-321.1. Motion in the Court of Appeals for delayed appeal in criminal cases.

A. Filing and content of motion.

When, due to the error, neglect, or fault of counsel representing the appellant, or of the court reporter, or of the circuit court or an officer or employee thereof, an appeal, in whole or in part, in a criminal case has (i) never been initiated, (ii) been dismissed for failure to adhere to proper form, procedures, or time limits in the perfection of the appeal, (iii) been dismissed in part because at least one assignment of error did not adhere to proper form of procedures, or (iv) the conviction has been affirmed for failure to file or timely file the indispensable transcript or written statement of facts as required by law or by the Rules of Supreme Court, then a motion for leave to pursue a delayed appeal may be filed in the Court of Appeals within six months after the appeal has been dismissed, the conviction has been affirmed, or the circuit court judgment sought to be appealed has become final, whichever is later. Such motion shall identify the circuit court and the style, date, and circuit court record number of the judgment sought to be appealed, and, if one was assigned in a prior attempt to appeal the judgment, shall give the Court of Appeals record number in that proceeding, and shall set forth the specific facts establishing the said error, neglect, or fault. If the error, neglect, or fault is alleged to be that of an attorney representing the appellant, the motion shall be accompanied by the affidavit of the attorney whose error, neglect, or fault is alleged, verifying the specific facts alleged in the motion, and certifying that the appellant is not personally responsible, in whole or in part, for the error, neglect, or fault causing loss of the original opportunity for appeal.

B. Service, response, and disposition. Such motion shall be served on the attorney for the Commonwealth and the Attorney General, in accordance with the Rules of Supreme Court. If the Commonwealth disputes the facts alleged in the motion, or contends that those facts do not entitle the appellant to a delayed appeal under this section, the motion shall be denied without prejudice to the appellant's right to seek a delayed appeal by means of petition for a writ of habeas corpus. Otherwise, the Court of Appeals shall, if the

- delayed appeal for criminal cases that have been dismissed for failure to timely file an indispensable transcript or written statement of facts.
24. Respondent did not explain to Tucker that he had to pursue the option of a delayed appeal in the Court of Appeals of Virginia in order to preserve Tucker's appeal on the insufficiency of the evidence either in the Court of Appeals of Virginia or in the Supreme Court of Virginia.
25. Respondent did not explain to Tucker that Tucker had six months to pursue a delayed appeal to the Court of Appeals of Virginia.
26. Respondent never took any steps to correct his failure to file the transcript timely while the Court of Appeals of Virginia retained jurisdiction over Tucker's appeal.
27. Respondent appealed the motion to suppress to the Supreme Court of Virginia. He filed the petition for appeal on March 4, 2024.
28. By email dated March 13, 2024, Respondent provided the petition for appeal to Ms. Wright. He stated that "the standing issue is the key issue." As follows is his email:

-
- motion meets the requirements of this section, grant appellant leave to initiate or re-initiate pursuit of the appeal.
- C. Time limits when motion granted. If the motion is granted, all computations of time under the Rules of Supreme Court shall run from the date of the order of the Court of Appeals granting the motion, or if the appellant has been determined to be indigent, from the date of the order by the circuit court appointing counsel to represent the appellant in the delayed appeal, whichever is later.
- D. Applicability. The provisions of this section shall not apply to cases in which the appellant is responsible, in whole or in part, for the error, neglect, or fault causing loss of the original opportunity for appeal, nor shall it apply in cases where the claim of error, neglect, or fault has already been alleged and rejected in a prior judicial proceeding.

From Paul Galanides <Paul@vadefensecounsel.com>

Date: Wed 3/13/2024 10:45 PM

To: Jaidia Wright <jaidaw1995@gmail.com>; Jaida Wright <jaidawright@icloud.com>

2 attachments (190 KB)

Notice of Appeal to SCV Tucker.pdf; SCV David Clarke Tucker petition final.pdf

I am sorry it has taken me a couple of weeks to send these to you. I have them on the home computer and have not had them accessible to me during the day. Anyway, I do think the standing issue is the key issue. And it really sounds very reasonable to me that David would have a reasonable expectation of privacy that society would be willing to recognize for anything in his sister's house. I feel like every immediate family member would feel the same way whether it was a sibling's or mom's/dad's houses as well. I think it will be an oral argument that I will have no trouble making. As always, I appreciate your patience and kind understanding. Paul.

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Respondent did not advise Tucker that the standing issue was now the only issue based on his failure to file the transcript from the first day of the trial. By order entered August 15, 2024, the Supreme Court of Virginia refused Tucker's petition for appeal.

29. By email dated September 10, 2024, Ms. Wright emailed Respondent regarding any updates on the status of the appeal.
30. By email dated September 10, 2024, Respondent attached the Supreme Court of Virginia's August 15, 2024 order and advised Ms. Wright that the Supreme Court dismissed Tucker's appeal.
31. By email dated September 12, 2024, Ms. Wright asked Respondent, "What are the next steps?"

32. By email dated September 22, 2024, Respondent replied:

On Sep 22, 2024, at 3:54 PM, Paul Galanides <Paul@vaDefenseCounsel.com> wrote:

So, when the Va. Supreme Court denies the appeal it means that one's direct appeals are over. That is, the state's courts have affirmed the conviction and the conviction is now final and it means our services have come to end as well. Most defendants serving long sentences look at a process called habeas corpus. I don't know that Davide would be in long enough. A habeas corpus is civil petition which alleges that there has been a violation of a person's constitutional rights and people file them in the trial court or in the Va. Supreme Court or in federal court even. The violation of constitutional rights can be for the rulings the state courts made at trial or on his appeal issues, or it could be for any other constitutional reason. This is the sort of petition in which defendant often raise the claim that they were denied effective assistance of counsel at trial or even on appeal. There are deadlines and very specific rules about how to do these correctly. Usually, defendants file them on their own; very few lawyers do habeas work and the ones that do charge an arm and a leg. (we don't, and the only attorney I know to refer to is David Hargett of Glen Allen). I just checked the DOC website and it says Dec of 2028. Have they given him the 15% good time credit yet? I would've thought his release date would be a bit sooner.

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33. Respondent did not notify Tucker of his possible right to a petition for writ of *habeas corpus* based on Respondent's failure to timely file the transcript of the first day of the trial.

34. By letter dated September 25, 2024, Respondent advised Tucker that the Supreme Court of Virginia declined to hear his appeal on August 15, 2024, and terminated his representation on the direct appeals.

35. Respondent never refunded Tucker any portion of the fee.

36. Tucker continued to reach out to Respondent to discuss Respondent's representation including by attempting to set up a call.

37. By emails dated July 15 and 24, 2025, Mr. Tucker, through Ms. Wright, stated that he had lost his appeal because the transcripts were not timely filed and requested a refund as follows:

Fwd: David Tucker Response

From: Jaide Wright <jaidaw1995@gmail.com>
Date: Thu 7/24/2025 10:06 AM
To: Paul Galanides <Paul.Galanides@defensecounsel.com>
Cc: Kara <kara@defensecounsel.com>

External (jaidaw1995@gmail.com)

Report This Email: FAQ: GoDaddy Advanced Email Security. Powered by iBKY

Good morning,

I am following up with you regarding the message below.

I also reached out several times regarding a conference call. Please let me know how you would like to proceed.

Begin forwarded message:

From: Jaide Wright <jaidaw1995@gmail.com>
Date: July 15, 2025 at 3:30:30 PM EDT
To: Paul Galanides <Paul.Galanides@defensecounsel.com>
Subject: David Tucker Response

Mr. Galanides,

My apologies for the inconvenience of my schedule, but I try to remain in every class and program I can get in here so I can be as productive as my environment will allow me to. It is unfortunate that after all of my research and understanding of my case, the reason I lost my appeal was because you filed my transcripts late. There's honestly no justification for it because as an attorney it is your obligation to know and study the law. I know I have a fighting chance, which is why my family chose to go in debt just to hire you to get me home. But I was deprived of that opportunity all because my case wasn't taken as a priority, and you not filing the transcripts in a timely fashion (Ineffective Counsel) resulted in the denial of my appeal. And for me, I feel I should be fully reimbursed everything that was given to you because you did not fulfill your obligations as my attorney, and my appeal was denied solely because of you. Now I know the proper way to contact the Bar and resolve everything in that manner.

But I also know that you are human, and I am empathetic to the fact that we all make mistakes. It's just unfortunate that it's at the cost of my freedom. But if we can settle this without going that far, I can agree to not pursue a lawsuit, or file for ineffective counsel. I just want to make sure me and my family are fully reimbursed the \$16,000 that was paid to you. Please feel free to contact me at your earliest convenience to get this issue resolved.

-David Tucker

38. By letter dated July 29, 2025, Respondent wrote in part to Tucker:

Mr. Tucker,

Thank you for your kind words. I wish you success in your efforts while locked up. I am sure it is difficult every day. I copied the email I have gotten from Jaida at the end of this letter, so that you know what I am responding to.

As for the delay in speaking, I will let you know that I am quite busy and it is not always easy to schedule calls. However, I am also getting conflicting and changing sources in that I have been hearing different things from your dad, from Jaida, from you. The only person with whom I should be discussing any of this is with you. But I will also say that once you begin threatening lawsuits and complaints etc., it does not help communication. That is why I am writing you this letter.

To begin, I requested several transcripts, including the two-day trial transcript. And all but one half of the two-day trial transcripts were filed on time. Court reporters are usually given the notice of appeal so they not only know exactly what transcripts have been requested, but also so that they have all my contact info and can advise the attorney when the deadline to file them is not going to be met. This court reporter never contacted me to advise she was not going to make the deadline.

In fact, I was led to believe all the transcripts were filed on time. A trial transcript is usually filed as a single unit, even if it is multiple volumes. I am not aware of ever having different volumes of the same transcript being filed weeks apart. I checked on the filing of the transcripts, and in the absence of any contact from the court reporter, when I saw that she had filed a transcript for Jan. 3rd. I assumed she had filed the entire two-day trial, not just the first day. Although the court record indicates she also submitted notices, she never included me on her notices, and the clerk of the court never forwarded me any notices either.

You previously claimed that I told Ms. Wright that I had "dropped the ball." I don't believe I said that, nor do I believe that the unusual facts here suggest that I did drop the ball. I of course acknowledge that the rule imposes the burden on me to make the record and that a mistake occurred. I simply maintain I was reasonably misled into believing the record had properly been made and that the mistake was not an unreasonable one.

You claim that as a result, I was constitutionally ineffective. I again disagree. The two-part test for ineffective assistance requires an unreasonable error that actually prejudices the case outcome. To prove ineffectiveness the client must show that, but for the unreasonable error of counsel, the outcome would have been different, i.e. that you would have won the appeal.

I already explained that I don't think the mistake was unreasonable. Nor was it prejudicial. Your appeal was not dismissed. There were two arguments raised on the Appellant's brief: standing to raise the motion to suppress and sufficiency of the evidence. Because they would not consider the second part of the trial transcript, the Court of Appeals said they would only address the standing issue on appeal. They addressed that issue in full and issued a ruling explaining why they disagreed with our arguments and why they were affirming the trial court's ruling that you had no standing to challenge the search and seizure.

Thereafter we appealed that ruling on the issue of standing from the Court of Appeals to the Virginia Supreme Court. That means, I not only filed the petition for appeal in the Supreme Court but also that, some months later, I made an oral argument to a writ panel of the Supreme Court in support of their taking up the issue. As they do in 95% of the petitions they receive, the Supreme Court declined the petition for appeal, but it was not for a lack of time and effort on my part.

The reason I put as much effort into the standing issue is because the sufficiency of the evidence issue was a loser argument from the start. When I accept an appeal case that I did not try in the circuit court, I make it clear to all that I do not know whether there will be any credible appealable issues in the case until I get into it. The reason the issue was a loser is because there was a *ridiculous amount* of evidence to support the conclusion that you had possessed the guns, especially the FN with the blood on it.

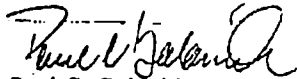
At the end of the letter, Respondent wrote:

I previously wrote and I empathized with how you felt about the appeal but I did not really reply in detail as I am now. I do so now because I do not agree with your claim that your appeal was not prioritized properly or that your appeal was denied and because I do not intend to refund all the money paid to me. I was paid for the time doing the work I did in your case. Lawyers are not paid based on the outcome of the case. Your appeal was presented to the Court of Appeals and the Virginia Supreme Court. Both courts heard the appeal and both courts affirmed your conviction. Yes, the CAV deemed one issued to be defaulted, but individual issues are ruled defaulted in appeals all the time. Stringent enforcement of the rules is just one of the ways the Court of Appeals eliminates as many appeals as they can without having to rule on every issue.

I previously offered you a partial refund, pointing out that there had been around \$1000 in costs I had incurred to produce your appeal, and offered you half of the balance. This was despite the fact that, even though the Court of Appeals defaulted one of the issues, I still did all the necessary work: I filed a valid opening brief, I traveled to the Court of Appeals panel in Northern Virginia and I made an oral argument before a panel of Appeals judges, I filed a petition for appeal in the Virginia Supreme Court and made an oral argument in support of your getting an appeal in that Court.

I am sorry that I could not succeed in your appeal but honestly, there's not a chance that an army of lawyers with every transcript could have won these issues on appeal. You were asking the Virginia courts to overrule United States Supreme Court precedent on standing that has stood for decades. Even with the defect in the record on appeal, I did everything I could and everything a reasonable and competent lawyer could and should have done in your case.

Nonetheless, in an attempt to make peace and to be of some assistance to you, I am willing to refund you \$2000 as a full settlement - no suits, no complaints. If you don't wish to accept, we really don't have much else to discuss.


Paul C. Galanides

39. On August 12, 2025, Tucker submitted a bar complaint again alleging that Respondent's failure to timely file the transcripts resulting in the denial of his appeal. Tucker noted that he had paid Respondent \$10,000 and that Respondent had refused to take responsibility for his failure to timely file the transcripts which resulted in the denial of Tucker's appeal.

II. NATURE OF MISCONDUCT

Such conduct by Respondent constitutes misconduct in violation of the following provisions of the Rules of Professional Conduct:

RULE 1.1 Competence

A lawyer shall provide competent representation to a client. Competent representation requires the legal knowledge, skill, thoroughness and preparation reasonably necessary for the representation.

By failing to take any action to preserve Tucker's right to an appeal on the sufficiency of the evidence assignment of error including by failing to

(1) timely file the transcript for the first day of trial and/or request an extension of time to do so,

(2) take any steps to correct his failure to timely file the transcript while the Court of Appeals of Virginia retained jurisdiction over Tucker's appeal, and

(3) file a motion for delayed appeal on Tucker's behalf,

Respondent violated Rules 1.1.

RULE 1.2 Scope of Representation

(a) A lawyer shall abide by a client's decisions concerning the objectives of representation, subject to paragraphs (b), (c), and (d), and shall consult with the client as to the means by which they are to be pursued. A lawyer shall abide by a client's decision, after consultation with the lawyer, whether to accept an offer of settlement of a matter. In a criminal case, the lawyer shall abide by the client's decision, after consultation with the lawyer, as to a plea to be entered, whether to waive jury trial and whether the client will testify.

RULE 1.4 Communication

(a) A lawyer shall keep a client reasonably informed about the status of a matter and promptly comply with reasonable requests for information.

(b) A lawyer shall explain a matter to the extent reasonably necessary to permit the client to make informed decisions regarding the representation.

By failing to explain to Tucker that

(1) Tucker could pursue a motion for delayed appeal in the Court of Appeals of Virginia to preserve his appeal which had been dismissed for failure to timely file the transcript of the first day of trial with the trial court,

(2) Tucker's deadline to seek a delayed appeal on the insufficiency of the evidence was August 1, 2024, and

(3) the delayed appeal exists for this purpose and was the only way that Tucker could preserve this argument on the insufficiency of the evidence.

And by instead stating to Tucker that Tucker's only options were a petition for rehearing and filing an appeal in the Supreme Court of Virginia, neither of which explained or addressed the insufficiency of the evidence and instead conflated the assignments of error, Respondent violated Rules 1.2(a) and 1.4(a) and (b).

RULE 1.5 Fees

(a) A lawyer's fee shall be reasonable. The factors to be considered in determining the reasonableness of a fee include the following:

- (1) the time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal service properly;
- (2) the likelihood, if apparent to the client, that the acceptance of the particular employment will preclude other employment by the lawyer;
- (3) the fee customarily charged in the locality for similar legal services;
- (4) the amount involved and the results obtained;
- (5) the time limitations imposed by the client or by the circumstances;
- (6) the nature and length of the professional relationship with the client;
- (7) the experience, reputation, and ability of the lawyer or lawyers performing the services; and
- (8) whether the fee is fixed or contingent.

By asserting in his fee agreement that the full fee for representation on appeal through the Supreme Court of Virginia was earned when he filed the opening brief in the Court of Appeals of Virginia, the first step in the process, and

By failing to return any portion of the fee after Respondent procedurally defaulted one of two grounds of the appeal and did not take the statutory step to correct his error, Respondent violated Rule 1.5(a).

III. PROPOSED DISPOSITION

Accordingly, Bar Counsel and Respondent tender to the Court for its approval the Agreed Disposition of a Three-Month Suspension with Term as representing an appropriate sanction if this matter were to be heard through an evidentiary hearing by the Court. Bar Counsel and Respondent agree that the effective date for the sanction shall be the close of business on July 24, 2026. The Term with which Respondent must comply on or before August 1, 2026 is as follows:

RESTITUTION

On or before August 1, 2026, Respondent must pay to Jaida Wright the sum of \$5,000.00 and submit proof of such payment to Bar Counsel at Virginia State Bar, 1111 East Main Street, Suite 700, Richmond, Virginia 23219. (Jaida Wright is not a party to this disciplinary action. The parties do not intend that Respondent's payment to Ms. Wright in accordance with this disciplinary action establishes or creates civil liability of

Respondent to Ms. Wright or Complainant David Tucker, nor do the parties intend that this payment operates to discharge and release the Respondent from claims of further liability, if any, to Ms. Wright or Mr. Tucker, or impairs the right of the Respondent to assert any defenses to such claims.)

Upon satisfactory proof that this term and condition has been met, this matter shall be closed.

If, however, if the term and condition is not met by August 1, 2026, Respondent agrees that the Court shall impose a Six-Month Suspension pursuant to Rules of Court, Part Six, Section IV, Paragraph 13-18.O.

If the Agreed Disposition is approved, the Clerk of the Disciplinary System shall assess costs pursuant to ¶ 13-9.E of the Rules.

THE VIRGINIA STATE BAR

Renu M. Brennan
By: _____
Renu M. Brennan
Bar Counsel

Paul Christopher Galanides

Paul Christopher Galanides
Respondent

Jeffrey Hamilton Geiger

Jeffrey Hamilton Geiger
Respondent's Counsel