

In the United States Court of Federal Claims

Nos. 25-11281, 25-11282

(Filed: March 31, 2026)

In re: Diana M. Parks

In re: Hadeel Maseoud

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FINAL ORDER

This matter was initiated after a judge of this Court submitted a memorandum outlining possible misconduct committed by respondents Diana Parks and Hadeel Maseoud. The matter was referred to the Standing Panel on Attorney Discipline (“Standing Panel”) pursuant to Rule 83.2(g)(2)(B)(i) of the Rules of the United States Court of Federal Claims (“RCFC”). For the reasons below, the Standing Panel concludes that Ms. Parks and Ms. Maseoud engaged in conduct unbecoming a member of the bar of this Court and that discipline is warranted pursuant to RCFC 83.2.

I. BACKGROUND

Ms. Parks has been a member of this Court’s bar since February 22, 2010, and as of the date of this order, she has six pending cases before the Court. Ms. Parks is the owner and managing partner of Curran Legal Services Group, which she founded in 2005. Her practice areas include government contracts and procurement law.¹ She became a member of the Georgia bar in 1991 and the bar of the United States Court of Appeals for the Federal Circuit in 2014.²

Ms. Maseoud has been a member of this Court’s bar since June 4, 2025, and, as of the date of this order, she has no pending cases as lead counsel in this Court. She is a senior associate at Curran Legal Services, which she joined in 2016, ECF No. 8 at 23:19–22; 62:10–16, and she is acting as “of counsel” on each of Ms. Parks’ currently pending matters. Her practice

¹ See *Diana Parks*, CURRAN LEGAL SERVS. GRP., <https://curranlegal.com/diana-parks/> [<https://web.archive.org/web/20250909035917/https://curranlegal.com/diana-parks/>] (last visited Dec. 2, 2025).

² See *Member Directory: Ms. Diana Marie Parks*, STATE BAR OF GA., <https://www.gabar.org/member-directory/?id=153D64B7BDC3A9524CBD0C2F8392D5A0> (last visited Dec. 2, 2025); *Attorney Admission Information Search*, U.S. CT. OF APPEALS FOR THE FED. CIR. <https://ecf.cafc.uscourts.gov/n/beam/servlet/TransportRoom?servlet=acafcAttySch.jsp> (last visited Dec. 11, 2025) (using the search terms “Parks” and “Diana”).

also focuses on government contracts and procurement law.³ Ms. Masseoud became a member of the New York State bar in 2004, the Georgia bar in 2005, and the bar of the United States Court of Appeals for the Federal Circuit in 2020.⁴ She has previously appeared with permission before several of this Court’s judges despite her lack of admission to the Court’s bar. *See* ECF No. 4 at 43–46.

On June 12, 2025, Judge Schwartz submitted a memorandum (“Referral Memorandum”) alleging possible misconduct following a request by Ms. Parks that Ms. Masseoud be allowed to participate in oral argument in a pending matter. *See generally* ECF No. 1. Judge Schwartz raised the following concerns: (1) that Ms. Masseoud participated in matters before this Court without admission to the Court’s bar and without notifying the presiding judge in some instances of her lack of admission; (2) that Ms. Masseoud misrepresented her intent to seek admission to the bar of this Court; (3) that Ms. Parks facilitated Ms. Masseoud’s conduct and made inaccurate representations regarding Ms. Masseoud’s bar application status; and (4) that respondents’ submissions to the Court may have contained additional misrepresentations and improperly cited language. *Id.* at 1. As required by the RCFC, these concerns were referred to the Court’s Standing Panel, which in turn opened an investigation to determine whether respondents had engaged in “conduct . . . that is unbecoming a member of the bar of this court.” *See* ECF No. 3 at 1 (quoting RCFC 83.2(c)(5)); RCFC 83.2(g)(2)(B)(i), (g)(3)(B).

On July 2, 2025, the Standing Panel directed respondents to respond to the allegations of misconduct raised by the referring judge. ECF No. 3 at 2. The Standing Panel observed that respondents may have violated the following provisions of the American Bar Association’s (“ABA”) Model Rules of Professional Conduct: M.R. 1.1 (“Competence”); M.R. 3.3(a)(1) (“Candor Toward the Tribunal”); M.R. 5.5(a) and (b) (“Unauthorized Practice of Law; Multijurisdictional Practice of Law”); M.R. 8.1 (“Bar Admission & Disciplinary Matters”); and M.R. 8.4(a) and (c) (“Misconduct”). *Id.* On August 1, 2025, respondents, through counsel, filed their response. ECF No. 4.

On October 24, 2025, the Standing Panel conducted a hearing, during which counsel for respondents requested permission to file a post-hearing supplemental response. ECF No. 8 at 105:1–5. The Standing Panel granted the request. *Id.* at 109:18–110:2. On November 13, 2025, respondents, through counsel, filed their supplemental response. ECF No. 9.

³ *See Hadeel N. Masseoud*, CURRAN LEGAL SERVS. GRP., <https://curranlegal.com/hadeel-n-masseoud/> [<https://web.archive.org/web/20250909035505/https://curranlegal.com/hadeel-n-masseoud/>] (last visited Mar. 23, 2026).

⁴ *See Member Directory: Ms. Hadeel Najati Masseoud*, STATE BAR OF GA., <https://www.gabar.org/member-directory/?id=0AD537CE4146E424672FDC3138A1BFF9> (last visited Dec. 2, 2025) (using the search terms “Masseoud” and “Hadeel”); ECF No. 4 at 39 (New York State Bar Registration Receipt); *Attorney Admission Information Search*, U.S. CT. OF APPEALS FOR THE FED. CIR., <https://ecf.ca9.uscourts.gov/n/beam/servlet/TransportRoom?servlet=acafcAttySch.jsp> (last visited Dec. 11, 2025) (using the search terms “Masseoud” and “Hadeel”).

II. THE COURT’S AUTHORITY FOR IMPOSING ATTORNEY DISCIPLINE

“Attorneys who appear before this court have a duty to conduct themselves in line with their ethical responsibilities and as officers of the court.” *Dobyns v. United States*, 178 Fed. Cl. 264, 284 (2025). To ensure they do so, this Court has the “inherent power and responsibility to supervise the conduct of attorneys who are admitted to practice before it . . .” RCFC 83.2(a); *see also In re Snyder*, 472 U.S. 634, 643 (1985) (“Courts have long recognized an inherent authority to suspend or disbar lawyers.” (citations omitted)). “This inherent power derives from the lawyer’s role as an officer of the court which granted admission.” *Snyder*, 472 U.S. at 643 (citing *Theard v. United States*, 354 U.S. 278, 281 (1957)). RCFC 83.2(c) provides that:

An attorney admitted to practice before this court, including an attorney admitted to appear *pro hac vice* pursuant to RCFC 83.1(a)(2), may be disciplined under this rule on any of the following grounds: . . .

(5) any conduct before the court that is unbecoming a member of the bar of this court.

RCFC 83.2(c)(5).⁵

Although the Court’s rules do not define “conduct . . . unbecoming a member of the bar,” the United States Supreme Court has explained that “it is clear that ‘conduct unbecoming a member of the bar’ is conduct contrary to professional standards that shows an unfitness to discharge continuing obligations to clients or the courts, or conduct inimical to the administration of justice.” *Snyder*, 472 U.S. at 645 (construing an analogous attorney misconduct rule). In evaluating an attorney’s conduct, courts are guided by “case law, applicable court rules, and the lore of the profession, as embodied in codes of professional conduct.” *Id.* (footnote and internal quotations omitted).

III. ABA MODEL RULES OF PROFESSIONAL CONDUCT

The RCFC do not explicitly incorporate the ABA Model Rules of Professional Conduct. “Nonetheless, the Court uses the ABA model rules to provide guidance regarding counsel’s obligations to the Court.” *AEG Invs. LP v. United States*, 147 Fed. Cl. 537, 538 (2020) (cleaned up) (quoting *FMS Inv. Corp. v. United States*, 137 Fed. Cl. 99, 102 (2018)); *see also In re Reines*, 771 F.3d 1326, 1329 (Fed. Cir. 2014) (applying the ABA Model Rules in construing an analogous attorney misconduct rule). That said, the Court need not find a violation of the ABA Model Rules to conclude that conduct is unbecoming a member of the bar; courts often impose

⁵ This is essentially the only standard for the Court to impose discipline for conduct that occurs directly in relation to this Court. The other provisions related to discipline regarding conduct that is subject to disciplinary action relate to disbarment or suspension from another bar, criminal conviction in another court, or failure to inform this Court of such action. *See* RCFC 83.2(c).

discipline for unbecoming conduct without reference to the Model Rules.⁶ *See, e.g., DCD Programs, Ltd. v. Leighton*, 846 F.2d 526 (9th Cir. 1988) (suspension imposed for misrepresentations); *In re Solerwitz*, 848 F.2d 1573 (Fed. Cir. 1988) (suspension imposed for continued pursuit of frivolous appeals).

During its investigation of this matter, the Standing Panel identified the following four Model Rules as most applicable to respondents' conduct: Rule 3.3 (Candor Toward the Tribunal); Rule 5.1 (Responsibilities of Partners, Managers, and Supervisory Lawyers); Rule 7.1 (Communications Concerning a Lawyer's Services); and Rule 8.4 (Misconduct). ECF No. 3 at 2. While Rules 5.1 and 7.1 were not included in the Standing Panel's initial order, their applicability became clear during the Standing Panel's investigation, and the respondents had the opportunity to address the Standing Panel's concerns regarding these provisions both at the hearing and in their post-hearing supplemental brief. The Court addresses each rule in turn.

Model Rule 3.3 embodies the duty of candor owed to the Court. It provides, in relevant part, that a lawyer "shall not knowingly . . . make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer." MODEL RULES OF PRO. CONDUCT r. 3.3(a)(1). Although the term "knowingly" "denotes actual knowledge of the fact in question," a person's knowledge may be inferred from circumstances. *Id.* r. 1.0(f). Statements made to the tribunal based on the lawyer's own knowledge "may properly be made only when the lawyer knows the assertion is true or believes it to be true on the basis of a reasonably diligent inquiry." *Id.* r. 3.3 cmt. [3]. In some circumstances, "failure to make a disclosure is the equivalent of an affirmative misrepresentation." *Id.*

Model Rule 5.1 delineates the ethical responsibilities of partners and other supervisory attorneys. It provides that partners in law firms, as well as lawyers who possess comparable managerial authority in a law firm, "shall make reasonable efforts to ensure that the firm has in effect measures giving reasonable assurance that all lawyers in the firm conform" to the applicable professional conduct rules. *Id.* r. 5.1(a). The rule further provides that a lawyer with direct supervisory authority "shall make reasonable efforts to ensure that [the lawyer he or she is supervising] conforms to the Rules of Professional Conduct." *Id.* r. 5.1(b). Under Model Rule 5.1(c)(2), a lawyer assumes vicarious liability for another lawyer's violations of the Model Rules if, in relevant part, "the lawyer is a partner or has comparable managerial authority . . . or has direct supervisory authority over the other lawyer, and knows of the conduct at a time when its consequences can be avoided or mitigated but fails to take reasonable remedial action."

⁶ The recent expansion of the grounds for discipline under RCFC 83.2 confirms that the Court may impose discipline even in the absence of an ABA Model Rules violation. *Compare* RCFC 83.2 (as amended through November 3, 2008) (RCFC 83.2(b)(1) explicitly listing a violation of the ABA Model Rules as a basis for disciplinary action), *with* RCFC 83.2(c)(5) (as amended through July 28, 2025) (RCFC 83.2(c) removing specific reference to violations of the ABA Model Rules and broadening the grounds for discipline to include "conduct . . . unbecoming a member of the bar of this court").

Model Rule 7.1 governs communications regarding lawyers' services. It provides that a "lawyer shall not make a false or misleading communication about the lawyer or the lawyer's services. A communication is false or misleading if it contains a material misrepresentation of fact or law, or omits a fact necessary to make the statement considered as a whole not materially misleading." *Id.* r. 7.1. This rule applies to "all communications about a lawyer's services" in any form and requires these statements to be truthful. *Id.* r. 7.1. cmt. [1]. Truthful statements are misleading if they omit "a fact necessary to make the lawyer's communication considered as a whole not materially misleading" and "if a substantial likelihood exists that it will lead a reasonable person to formulate a specific conclusion about the lawyer or the lawyer's services for which there is no reasonable factual foundation." *Id.* r. 7.1. cmt. [2].

Finally, Model Rule 8.4 broadly defines professional misconduct. As relevant here, it provides that "[i]t is professional misconduct for a lawyer to . . . engage in conduct involving dishonesty, fraud, deceit or misrepresentation." *Id.* r. 8.4(c).

IV. RESPONDENTS' CONDUCT

The Standing Panel's investigation identified four instances of conduct that warrant discipline. First, on April 22, 2022, Ms. Parks sent an email to Judge Holte's chambers that represented:

We advise that Intervenor intends to attend the oral argument scheduled before the Court on April 28, in person, as ordered by Judge Holte. We seek to assure that there is no objection of the Court . . . for Ms. Hadeel Maseoud to attend and provide argument from the Intervenor. She is of counsel on all filings made on behalf of Intervenor before the Court on this matter, has been present on every status conference held, and she is admitted to the Protective Order that is in place. *Ms. Maseoud is admitted at the U.S. Court of Appeals for the Federal Circuit and multiple state courts and has an application for admission to this specific court currently pending.* Please advise before close of business today, if possible, of any concerns or issues with Ms. Maseoud's appearance before this court next Thursday for the Intervenor. In the event there is a concern or issue expressed, the undersigned will attend to assure Intervenor is adequately represented at oral argument.

ECF No. 4 at 50 (emphasis added). Ms. Maseoud was not copied on this email. *See id.* However, later that day, Ms. Parks forwarded the email to Ms. Maseoud stating "[s]ent – now we wait[.]" and Ms. Maseoud responded by asking if "anyone [had] objected[.]" *Id.* At the time of this email, Ms. Maseoud was *not* admitted to *multiple* state courts and did not have an application for admission to this Court pending. Although Ms. Maseoud was admitted to the Georgia State Bar and was in good standing, *id.* at 30, she was administratively suspended from practicing in the state of New York in 2013 for failure to comply with the biennial registration

requirement, *id.* at 34.⁷ Furthermore, even though Ms. Masseoud had applied for e-filing privileges in this Court in 2021, there is no record of her applying for admission prior to 2025—three years after the above email. ECF No. 1 at 4. Ms. Masseoud has conceded that she did not have an application for admission to this Court pending at the time of the April 2022 email. *See* ECF No. 8 at 52:6–12. Ms. Masseoud also conceded that she knew Ms. Parks’ representations were inaccurate, yet neither Ms. Masseoud nor Ms. Parks notified the Court of the inaccuracy. *See id.* at 52:6–53:14. Judge Holte, unaware of the inaccuracies in the email, ultimately allowed Ms. Masseoud to participate in the oral argument. *See* ECF No. 4 at 44.

Next, on May 30, 2024, Ms. Masseoud sent the following email to Judge Horn’s chambers and copied Ms. Parks:

I am writing to inquire as to whether it is possible to conduct the hearing on the Defendant’s Motion to Dismiss currently set for June 20 via zoom. Plaintiff’s corporate representative is a paralegic and would like to be present at the hearing, but has limited ability to travel.

In the event that a zoom hearing cannot be conducted, we request that I be able to argue on behalf of the Plaintiff at the hearing rather than Ms. Parks, who also has difficulty traveling due to health issues. I am currently of counsel in this matter, and while I am a member of the bar of the Federal Circuit Court of Appeals, I am not yet a member of the bar of this Court. *I will be submitting an application for admission shorty [sic] and have been permitted to argue before this Court with no issues in another matter before Judge Holte.*

Id. at 57–58 (emphasis added). Judge Horn allowed Ms. Masseoud to participate in the oral argument. *See id.* at 56. Despite her representation to the Court, Ms. Masseoud did not apply for admission to this Court until approximately one year later, gaining admission on June 4, 2025—and she did so only after Judge Schwartz insisted she be admitted in order to participate in an oral argument. *Id.* at 6–7. Ms. Masseoud also did not notify Judge Horn of her failure to apply after a reasonable time had passed and she had not yet made good on her pledge, claiming that such notice became “irrelevant” after her appearance. *See* ECF No. 8 at 34:18–23. Moreover, Ms. Masseoud represented in the above email that she was “permitted to argue before this Court with no issues in another matter before Judge Holte.” ECF No. 4 at 58. However, as discussed above, her permission to appear before Judge Holte was based, in part, on the misrepresentation that she was admitted to “multiple state courts and has application for admission to this specific court currently pending.” *Id.* at 50. In other words, this new misrepresentation to Judge Horn’s chambers compounds the previous misrepresentation to Judge Holte’s chambers that Ms. Masseoud failed to correct.

⁷ On July 10, 2025, following written notice of the investigation, Ms. Masseoud updated her registration, paid her outstanding fees, and moved for reinstatement in New York. ECF No. 4 at 5; ECF No. 9 at 2–3; *see also* ECF No. 8 at 46:5–47:19. On August 28, 2025, the Supreme Court of the State of New York granted Ms. Masseoud’s motion for reinstatement. *In re Masseoud*, No. 25-ad-11282 (Fed. Cl. Aug. 28, 2025), ECF No. 5; ECF No. 8 at 7:2–8, 15:18–20.

Third, on May 15, 2025, Ms. Parks moved for leave for Ms. Masseoud to argue on their client’s behalf in a case before Judge Schwartz. *Id.* at 23–24. The motion represented that Ms. Masseoud is “an attorney licensed to practice in the States of Georgia and New York” *Id.* at 23. As previously noted, Ms. Masseoud was not admitted to practice in the state of New York at the time. *See id.* at 5.

And finally, both prior to and at the time of the hearing in this disciplinary matter, Ms. Masseoud’s profile on her law firm website represented that she possesses “[b]ar [a]dmissions” in Georgia, New York, the United States Court of Federal Claims, the Civilian Board of Contract Appeals (“CBCA”), the Government Accountability Office (“GAO”), the Court of Appeals for the Federal Circuit, and the United States District Court for the Middle District of Georgia.⁸ Several of these representations are false. First, Ms. Masseoud has never been admitted to the Middle District of Georgia. ECF No. 8 at 16:24–17:2. Second, the GAO and CBCA do not have bars that require admission, rendering Ms. Masseoud’s purported admission a factual impossibility. *Id.* at 16:16–23. Finally, despite her publicly advertised status, Ms. Masseoud did not become a member of this Court’s bar until June 4, 2025. *Id.* at 15:21–16:6; *see also* ECF No. 4 at 6–7. Review of previous versions of respondents’ website demonstrates that these inaccurate representations appeared on the firm’s website at least since December 3, 2021. *See Hadeel N. Masseoud, supra* note 5. They remained on the website until after the October 24, 2025, hearing in this matter—immediately after which respondents “took action to remove the incorrect information” ECF No. 9 at 6. That is, the website was taken down, and as of the date of this opinion, remains down. The website was not simply updated to correct the inaccurate information.

V. MS. MASSEOUD VIOLATED THE ABA MODEL RULES OF PROFESSIONAL CONDUCT

The Standing Panel finds that Ms. Masseoud’s conduct in connection with (1) the April 22, 2022, and May 30, 2024, email communications to the Court, (2) the May 15, 2025, motion to permit her to appear, and (3) the misrepresentations made on her law firm’s website violated the Model Rules, and such violations constitute “conduct . . . unbecoming a member of the bar of this court.” *See* RCFC 83.2(c)(5).

With respect to the April 22, 2022, email communication with Judge Holte’s chambers, the record indicates that Ms. Masseoud “knowingly . . . fail[ed] to correct a false statement of material fact . . . previously made to the tribunal” MODEL RULES OF PRO. CONDUCT r. 3.3(a)(1). Specifically, Ms. Masseoud failed to correct misrepresentations that Ms. Parks made regarding her credentials and admission status—namely that Ms. Masseoud was admitted in “multiple state courts”⁹ and had “an application for admission to this specific court currently pending.” *See* ECF No. 4 at 50.

⁸ *See Hadeel N. Masseoud, supra* note 5.

⁹ The Standing Panel acknowledges that neither the Referral Memorandum nor the Panel’s notice to respondents concerning the investigation or hearing specifically raised concerns regarding Ms.

Indeed, Ms. Masseoud herself admits that she knew of the falsity of at least one of Ms. Parks' representations on her behalf; at the hearing, she testified that, after seeing the email to Judge Holte's chambers, she "talk[ed] to [Ms. Parks] about it" and "t[old] her that [the statement regarding her pending application] was inaccurate." ECF No. 8 at 51:4–5, 53:10. Ms. Masseoud also testified that, though she did not have an application to the bar of this Court pending in 2022, "at the time, [she] really did intend on submitting an application." *Id.* at 52:7–8. Ms. Masseoud's testimony regarding her "intent" to submit an application confirms that she knew she did not have a pending application at the time the statement was made.

Moreover, it is not credible that Ms. Masseoud was unaware that her attorney registration in New York had lapsed and that she believed that she was admitted to "multiple state courts," as claimed by Ms. Parks. Even if the Standing Panel credits Ms. Masseoud's assertion that she had no actual knowledge of her 2013 administrative suspension in New York, ECF No. 4 at 6, Ms. Masseoud admitted under oath that she "knew that [she] wasn't paying bar dues in New York," ECF No. 8 at 27:5–6. When questioned if she knew there were consequences for not paying bar dues, she maintained that she "honestly didn't think about it, and that's the honest truth." ECF No. 8 at 27:13–17. However, all New York attorneys are required to file a registration statement and pay dues biennially. *See* N.Y. JUD. LAW § 468-a(2), (4) (McKinney 2010); N.Y. COMP. CODES R. & REGS. tit. 22, § 118.1(c) (2024). Attorneys who default in these obligations are subject to the imposition of discipline by the appropriate Appellate Division of the Supreme Court, which routinely "suspend[s] attorneys en masse for such failure to register or re-register, and pay any applicable registration fee" *See, e.g., Matter of Att'ys in Violation of Judiciary Law § 468-a*, 211 A.D.3d 65, 66 (N.Y. App. Div. 2022). As an attorney who "initially maintained her New York registration and paid the required fees for many years," it can be inferred that Ms. Masseoud knew of these biennial requirements and the consequences of her failure to comply.¹⁰ ECF No. 4 at 5; *see also* ECF No. 8 at 29:2–7. Accordingly, Ms. Masseoud's insistence that she "didn't realize that [her New York] registration had lapsed," is not credible, and the Standing Panel finds that Ms. Masseoud knew that Ms. Parks made a false statement regarding her admission to "multiple state courts." ECF No. 8 at 27:1–2.

Both false statements concerned material facts. "While the term 'material' is not defined in [the Rule at issue] or its commentary, it is not a difficult concept to comprehend." *Ausherman v. Bank of Am. Corp.*, 212 F. Supp. 2d 435, 449 (D. Md. 2002). Black's Law Dictionary defines "material fact" as "[a] fact that is significant or essential to the issue or matter at hand." *Fact*, BLACK'S LAW DICTIONARY (12th ed. 2024). The record reflects that, in the course of attempting

Parks' representation that Ms. Masseoud was admitted in "multiple state courts." However, this inaccuracy was first identified during the Panel's investigation into this matter, and respondents were given the opportunity to address the concerns during the hearing and in their supplemental post-hearing response brief.

¹⁰ Presumably, that is why, when questioned as to whether she "thought [she] [was] a member in good standing of the bar of the State of New York," Ms. Masseoud replied, "I never said that." ECF No. 8 at 29:25–30:3.

to convince Judge Holte to allow Ms. Masseoud to appear before him, Ms. Parks falsely represented that Ms. Masseoud was admitted in “multiple state courts” and had “an application for admission to this specific court currently pending.” ECF No. 4 at 50. Such facts may be reasonably viewed as important to the question of whether Ms. Masseoud should be permitted to appear, as the only reason to include these representations regarding bar admissions is because they were “significant” or “essential” to the issue of whether she should be permitted to appear. And they may even have swayed Judge Holte’s decision on the matter.

Even though the Standing Panel finds that Ms. Masseoud “knowingly . . . fail[ed] to correct a false statement of material fact . . . previously made to the tribunal,” it nonetheless concludes that her conduct with respect to the April 2022 email did not rise to a technical violation of Model Rule 3.3. MODEL RULES OF PRO. CONDUCT r. 3.3(a)(1). Because Ms. Parks, and not Ms. Masseoud, made the offending April 2022 statements, the plain language of Model Rule 3.3 does not reach Ms. Masseoud’s conduct. Model Rule 3.3(a)(1) narrowly prohibits a lawyer from knowingly making a false statement or failing to correct a false statement of material fact that *he or she* had previously made to the tribunal; the rule does not expressly address the duties owed by a lawyer when *another* lawyer makes a false statement. *See id.* Accordingly, the Standing Panel finds Ms. Masseoud’s conduct related to the April 2022 email violated the spirit—but not necessarily the letter—of Model Rule 3.3.¹¹

Nonetheless, Ms. Masseoud’s conduct with respect to the April 2022 email is not above reproach. Separate from Model Rule 3.3, she had a broad, unqualified duty to avoid “professional misconduct,” including “conduct involving dishonesty, fraud, deceit or misrepresentation.” MODEL RULES OF PRO. CONDUCT r. 8.4(c). Importantly, “professional misconduct” is broadly defined; a violation of Model Rule 8.4(c) does not require an affirmative false statement or any other particular act. *See id.* r. 4.1 cmt. [1] (“For dishonest conduct that does not amount to a false statement . . . see Rule 8.4.”).

Although there is no clear consensus on when an attorney’s conduct crosses the line and violates Model Rule 8.4(c), the Standing Panel is convinced that Ms. Masseoud’s failure to correct statements she knew to be false constitutes dishonest conduct and, therefore, violates Model Rule 8.4(c). *See Romero-Barcelo v. Acevedo-Vila*, 275 F. Supp. 2d 177, 191 (D.P.R. 2003) (“[C]ourts have held that the rule against dishonesty can be violated by silence or a failure to speak, including conduct that involved no express misrepresentations but simply consisted of a failure to reveal underlying facts which might be necessary to avoid misleading someone.”); *see also In re Scanio*, 919 A.2d 1137, 1142–43 (D.C. 2007) (observing that “dishonesty” is a “general term” that includes “conduct evincing a lack of honesty, probity or integrity in principle; a lack of fairness and straightforwardness” (internal quotation marks omitted)

¹¹ In addition to the duty of candor embodied in Model Rule 3.3, there exists a broader, more general duty of candor. *See United States v. Shaffer Equip. Co.*, 11 F.3d 450, 458 (4th Cir. 1993) (“[N]either [Rule 3.3] nor the entire Code of Professional Responsibility displaces the broader general duty of candor and good faith required to protect the integrity of the entire judicial process.”). Because respondents were not on notice that the Standing Panel might consider discipline on this basis, the Standing Panel reserves judgment as to whether Ms. Masseoud and Ms. Parks breached “a duty of candor broader than Rule 3.3.” *Id.*

(applying D.C.’s analog of Rule 8.4)). Once Ms. Masseoud learned that Ms. Parks had made false representations regarding her credentials and declined to correct the misunderstanding or reveal the truth, she engaged in dishonest conduct and misrepresentation. *See Romero-Barcelo*, 275 F. Supp. 2d at 191 (“A half-truth or silence can be as much a misrepresentation as a lie . . . [particularly when] they fail to advise the court of very important necessary information . . .” (alteration and omissions in original) (quoting *In re Greene*, 620 P.2d 1379, 1383 (1980))). More importantly, as discussed above, a violation of the ABA Model Rules is not required to establish a violation of RCFC 83.2(c)(5).

Ms. Masseoud’s May 30, 2024, email communication with Judge Horn’s chambers likewise involved dishonest conduct and misrepresentation. In that instance, Ms. Masseoud personally avowed that she would “be submitting an application for admission [to the bar of this Court] short[l]y” in support of her request that she be allowed to argue on behalf of a client. ECF No. 4 at 58. Like Ms. Parks’ April 2022 statements, Ms. Masseoud’s assurance that she would submit an application “short[l]y” was material because it was “significant” to Judge Horn’s decision on whether Ms. Masseoud would be allowed to appear before the Court. While Ms. Masseoud argues that such statement was true at the time it was made, *see id.* at 7, the record contains no indication that Ms. Masseoud undertook any efforts to make good on this pledge within a “short” time, as promised.¹² Instead, Ms. Masseoud acknowledges she “delayed” her application because Judge Horn allowed her to participate in arguments, her lack of membership to the bar notwithstanding. *See id.* Indeed, Ms. Masseoud did not apply for admission to this Court’s bar until over one year later, after Judge Schwartz denied her request to appear before him without formal admission. *See id.* at 6–7; ECF No. 1 at 3.

Under such circumstances, the Standing Panel finds Ms. Masseoud misrepresented her intent to apply to the bar of this Court and thus (1) “ma[de] a false statement . . . to a tribunal” and (2) “engag[ed] in conduct involving dishonesty . . . or misrepresentation.” MODEL RULES OF PRO. CONDUCT r. 3.3(a)(1), 8.4(c). Even affording her the benefit of the doubt and accepting as true her claim that, at the time she made the statement, she intended to submit an application, the Standing Panel cannot overlook the fact that Ms. Masseoud made no attempt to correct her statement once she chose to “delay” her application and it became clear she could no longer apply “shortly.” Attorneys have a “continuing duty” to apprise the Court of developments. *See Hanover Ins. Co. v. United States*, 146 Fed. Cl. 447, 450 (2019) (quoting *Fusari v. Steinberg*, 419 U.S. 379, 391 (1975)). Once Ms. Masseoud chose to delay her application, a duty attached to inform the Court that her intent, which Judge Horn relied on, had changed. By failing to do so,

¹² Although respondents submitted correspondence indicating that Ms. Masseoud was actively making efforts to gain admission to this Court’s bar in April 2022, ECF No. 9 at 11–18, no evidence suggests Ms. Masseoud made similar efforts at or around the time she pledged to submit an application “shortly.” Moreover, it cannot be gainsaid that application to this Court’s bar is not onerous if an attorney has the proper credentials (admission in good standing to the highest court of any U.S. state, territory, or possession, or the District of Columbia and a statement of support from a member of the bar of this Court or the Supreme Court). *See* RCFC 83.1(b). The application itself is less than page long and only requires providing very basic information.

she violated Model Rule 3.3(a)(1) by failing to “correct [her] false statement of material fact” and violated Model Rule 8.4(c) by engaging in dishonest conduct.

Turning to Ms. Masseoud’s conduct in connection with her law firm’s website, the Standing Panel finds she violated Model Rule 7.1 (Communications Concerning a Lawyer’s Services) and Model Rule 8.4 (Misconduct).¹³ As noted, Model Rule 7.1 prohibits a lawyer from “mak[ing] a false or misleading communication about the lawyer or the lawyer’s services.” MODEL RULES OF PRO. CONDUCT r. 7.1. From at least December 2021 to October 2025, Ms. Masseoud’s profile on her law firm’s website contained several false representations—that she was admitted to the bars of the U.S. District Court for the Middle District of Georgia, the GAO, the CBCA, and this Court. *See Hadeel N. Massoued, supra* note 5. Ms. Masseoud admits that, at the time these representations first appeared on the firm’s website, she was not admitted to practice before any of these entities. *See* ECF No. 8 at 15:21–17:2. During questioning, she admitted that she only applied and became a member of the bar of this Court in 2025, that the GAO and CBCA do not even have bars, and that she is not a member of the bar of the Middle District of Georgia. *See id.* at 15:24–16:1, 16:16–17:2. She acknowledged that the website was inaccurate as to her bar admissions. *See id.* at 19:8–20:22.

Although Ms. Masseoud disclaims responsibility for the appearance of these false statements on her firm’s website, she acknowledged that she played a role in drafting her website biography. *See id.* at 17:10–16, 21:20–22:3. She confirmed that she “drafted the language pertaining to [her] experience,” *id.*, and Ms. Parks confirmed that Ms. Masseoud prepared her own biography, *id.* at 65:19–25, 68:8–9. As stated above, this biography was rife with material misrepresentations of fact regarding Ms. Masseoud’s admission status to various bars. Accordingly, the Standing Panel finds that Ms. Masseoud “ma[de] a false or misleading communication” about her services in violation of Model Rule 7.1. MODEL RULES OF PRO. CONDUCT r. 7.1. Because her misrepresentations concerning her credentials also constitute “conduct involving dishonesty, fraud, deceit or misrepresentation,” the Standing Panel likewise finds that Ms. Masseoud violated Model Rule 8.4. MODEL RULES OF PRO. CONDUCT r. 8.4(c).

VI. MS. PARKS VIOLATED THE ABA MODEL RULES OF PROFESSIONAL CONDUCT

The Standing Panel also finds that Ms. Parks’ communications with the Court and other conduct violated the Model Rules and thus constitutes “conduct . . . unbecoming a member of the bar of this court.” *See* RCFC 83.2(c)(5).

¹³ In their supplemental response brief, respondents state that during the hearing on this matter, “members of the Panel raised for the first time concerns about statements made on Ms. Parks and Ms. Masseoud’s law firm website that were or may have been incorrect concerning Ms. Masseoud’s bar admissions.” ECF No. 9 at 5. While respondents are correct that “these issues were not included in the [Referral] Memorandum or the Panel’s notice to Respondents concerning the investigation or hearing,” these inaccuracies were first identified during the Panel’s investigation into this matter. *Id.* Respondents had the opportunity to address the concerns during the hearing and in their supplemental post-hearing response brief.

First, Ms. Parks “knowingly ma[d]e a false statement of fact . . . to a tribunal” in violation of Model Rule 3.3(a)(1) when she represented to Judge Schwartz in May 2025 that Ms. Masseoud was “licensed to practice in . . . New York.” MODEL RULES OF PRO. CONDUCT r. 3.3(a)(1); ECF No. 4 at 23. “A statement of positive fact is a representation not only that the fact is true as represented, but also that the person making the statement has a solid basis for making it.” *In re Kelly*, 808 F.2d 549, 551 (7th Cir. 1986). As such, statements made to the tribunal purporting to be based on the lawyer’s own knowledge “may properly be made only when the lawyer knows the assertion is true or believes it to be true on the basis of a reasonably diligent inquiry.” MODEL RULES OF PRO. CONDUCT r. 3.3 cmt. [3]. But Ms. Parks did not conduct a “reasonably diligent inquiry” or have a solid basis for believing that Ms. Masseoud was admitted to the New York bar. By her own admission, Ms. Parks believed that Ms. Masseoud “had gone essentially inactive” in New York.¹⁴ ECF No. 8 at 66:20–24. Despite knowing that Ms. Masseoud was “essentially inactive” in New York, she nonetheless represented to Judge Schwartz that Ms. Masseoud was “licensed to practice in . . . New York.” ECF No. 4 at 23.

As discussed above, in 2022, Ms. Parks had similarly represented to Judge Holte’s chambers that Ms. Masseoud was admitted to “multiple state courts” and that she “ha[d] an application for admission to this [Court] currently pending.” *Id.* at 50. However, because Ms. Masseoud was not admitted to practice in the state of New York at the time, *see id.* at 34, Ms. Masseoud was not admitted to *multiple* state courts, as claimed. For the reasons discussed in the preceding paragraph, the Standing Panel finds that Ms. Parks knowingly made these false statements of fact in violation of Model Rule 3.3(a)(1).

It is unclear whether Ms. Parks had actual knowledge that Ms. Masseoud did not “ha[ve] an application for admission to this [Court] currently pending” when she made that representation. *See id.* at 50. At the hearing before the Standing Panel, Ms. Parks testified that Ms. Masseoud had simultaneously prepared applications for the bars of this Court and the Federal Circuit, and Ms. Parks was confused as to which had been submitted. *See* ECF No. 8 at 64:9–10, 78:3–8. Regardless, the record shows that Ms. Parks subsequently became aware of the falsity of her statement that Ms. Masseoud’s admission to this Court was pending. As discussed, Ms. Masseoud testified that, after seeing Ms. Parks’ April 2022 email, she “talk[ed] to [Ms. Parks] about it” and “t[old] her that [the statement regarding her pending application at this Court] was inaccurate.” *Id.* at 51:4, 53:10. At that point, Ms. Parks had not only an opportunity but an obligation “to correct a false statement of material fact . . . previously made to the tribunal”—but she neglected to do so. MODEL RULES OF PRO. CONDUCT r. 3.3(a)(1); *see also Hanover Ins.*, 146 Fed. Cl. at 450 (recognizing attorneys’ “continuing duty” to inform the Court of developments (citation omitted)). Furthermore, by not correcting a statement she knew to be false, she also engaged in dishonest conduct, in violation of Model Rule 8.4. *See* MODEL RULES OF PRO. CONDUCT r. 8.4; *see also Romero-Barcelo*, 275 F. Supp. 2d at 191 (“[C]ourts have held that the rule against dishonesty can be violated by silence or a failure to speak, including conduct that involved no express misrepresentations but simply consisted of a failure to reveal underlying facts which might be necessary to avoid misleading someone.”).

¹⁴ New York does not recognize an “inactive” status at its bar. *See* JUD. § 468-a(4) (requiring all attorneys to register biennially, regardless of whether they are engaged in the practice of law, except for those who certify they have retired).

Ms. Parks also violated her ethical duties concerning communications about her services. Model Rule 7.1 prohibits an attorney from “mak[ing] a false or misleading communication about the lawyer or the lawyer’s services.” MODEL RULES OF PRO. CONDUCT r. 7.1. As discussed above, Ms. Masseoud’s biography on Curran Legal Services Group’s website contained several inaccurate statements that falsely represented that Ms. Masseoud was a member of several bars, both real and imagined. *See Hadeel N. Massoued, supra* note 5. Ms. Parks testified that she reviewed Ms. Masseoud’s biography before it was uploaded and that no one other than she, Ms. Masseoud, and the company hosting the website would have been involved in creating and posting Ms. Masseoud’s biography. ECF No. 8 at 66:3, 68:6–23. Ms. Parks conceded that, as the individual responsible for operating her law firm, she bore responsibility to ensure the firm’s website presented accurate information. *Id.* at 74:14–18. The Standing Panel agrees. As the Curran Legal Services Group’s sole partner, ultimate responsibility for the website’s content fell to Ms. Parks. While she testified that she was “not terribly involved in the website” and that she has “not spent a great deal of time in managing th[e] website,” *id.* at 64:25–65:1, 74:21–22, Ms. Parks’ hands-off approach to her website does not excuse her failure to ensure its accuracy. Even though Ms. Masseoud drafted her own website biography, Ms. Parks authorized its publication. Under Model Rule 7.1, “[w]hatever means are used to make known a lawyer’s services, statements about them must be truthful.” MODEL RULES OF PRO. CONDUCT r. 7.1 cmt. [1]. The statements made regarding Ms. Masseoud’s services—and by extension, the firm’s services—were not truthful. Accordingly, the Standing Panel finds that Ms. Parks also violated Model Rule 7.1.

Additionally, Model Rule 5.1 charges Ms. Parks, as a law firm partner, with “mak[ing] reasonable efforts to ensure that the firm has in effect measures giving reasonable assurance that all lawyers in the firm conform to the Rules of Professional Conduct.” *Id.* r. 5.1(a). As a lawyer with supervisory authority over Ms. Masseoud, Ms. Parks also has a broad general obligation to “make reasonable efforts to ensure that [Ms. Masseoud] conforms to the Rules of Professional Conduct.” *Id.* r. 5.1(b). The record reflects that Ms. Parks fell short of these duties and failed to provide the required oversight. On Ms. Parks’ watch, Ms. Masseoud took no action to correct false statements made on her behalf to a tribunal, misrepresented her intent to apply to the bar of this Court “short[l]y,” and falsely advertised to the public that she was admitted to several bars. *See* ECF No. 8 at 53:11–14; ECF No. 4 at 58; ECF No. 9 at 6 (acknowledging “the posting of this incorrect information”). Ms. Parks herself made false representations and communications regarding Ms. Masseoud’s licensure and bar admission status. *See, e.g.,* ECF No. 4 at 23, 50; ECF No. 9 at 6 (acknowledging “incorrect statements”). The fact that two members of her (very small) law firm engaged in multiple instances of misconduct over a prolonged period of time demonstrates that Ms. Parks failed to make reasonable efforts to ensure: (1) that the firm had measures in effect to guard against such behavior; and (2) that Ms. Masseoud complied with her professional obligations under the Model Rules.

VII. THE APPROPRIATE DISCIPLINE FOR RESPONDENTS’ CONDUCT

Having found that respondents’ actions violated the ABA Model Rules and that such violations constitute “conduct . . . unbecoming a member of the bar” under RCFC 83.2(c)(5), the Standing Panel must decide what discipline should be imposed.

Under the RCFC, an attorney disciplined for conduct identified in RCFC 83.2(c) may be: (1) disbarred; (2) suspended; (3) reprimanded; (4) required to provide restitution or pay monetary sanctions; or (5) subjected to other disciplinary action as warranted. RCFC 83.2(d)(1). The RCFC do not provide a presumptive disciplinary measure for conduct unbecoming a member of the bar of this Court. It is up to the Standing Panel to “determine the appropriate discipline” for such misconduct. RCFC 83.2(g)(7)(D).

“In determining the discipline to impose, [the Standing Panel] look[s] to ‘the existence of any aggravating or mitigating factors.’” *In re Reines*, 771 F.3d at 1332 (quoting MODEL RULES FOR LAW. DISCIPLINARY ENF’T r. 10(c)(4)); *see also* ABA STANDARDS FOR IMPOSING LAW. SANCTIONS § 9.1.

A. Mitigating Factors

As mitigating factors, the Standing Panel recognizes that neither respondent has any previous disciplinary history.¹⁵ Furthermore, both respondents have willingly participated in the disciplinary proceedings here. During the time period at issue in this matter, both respondents had personal health or family issues that may have contributed to lapses in judgment and professional oversights. *See* ECF No. 8 at 31:15–21, 83:3–14. Moreover, respondents have taken remedial action to cure the offending conduct. For example, Ms. Maseoud pursued reinstatement to the New York State bar. ECF No. 4 at 5; ECF No. 9 at 2. Ms. Maseoud likewise obtained admission to this Court’s bar. ECF No. 4 at 6–7. Respondents removed the inaccurate information concerning Ms. Maseoud’s bar admissions from their law firm website by taking down the website. ECF No. 9 at 5–6. And Ms. Parks has initiated changes to ensure that associates at her firm have proper credentials in federal court. ECF No. 8 at 101:12–18.

B. Aggravating Factors

1. Lack of remorse

It is proper to take expressions of remorse—or lack thereof—into account as an aggravating or mitigating factor. *See In re Cook*, 551 F.3d 542, 551 (6th Cir. 2009) (“Due process is not implicated by the consideration of a defendant’s lack of remorse as an aggravating factor. It is well established that a defendant’s remorse—or lack thereof—is an appropriate consideration in meting out punishment.”); *see also In re Violation of Revised Protocols for In-Person Arguments and Related Ord.*, 26 F.4th 1270, 1274 (Fed. Cir. 2022) (declining to discipline attorneys due, in part, to expressions of earnest remorse). “Indeed, the Supreme Court has specifically recognized that remorse is relevant in attorney disciplinary proceedings.” *In re Cook*, 551 F.3d at 551 (citing *McKune v. Lile*, 536 U.S. 24, 40 (2002)).

In the instant matter, respondents claim that they exhibited remorse and that it should be considered as a mitigating factor. *See* ECF No. 9 at 8 (“Each of the Respondents has, in their

¹⁵ Ms. Maseoud’s prior suspension from the New York bar was administrative, not disciplinary. ECF No. 8 at 6:19–20.

written submissions and in their testimony, expressed remorse concerning the mistakes they have made.”). The Standing Panel not only disagrees that respondents expressed remorse (and that it should be counted as a mitigating factor) but finds that their failure to express remorse should be considered an aggravating factor. While respondents did express regret,¹⁶ the Standing Panel cannot find that Ms. Masseoud or Ms. Parks communicated a sense of remorse because their supplemental response concludes that they “have not violated any disciplinary rule.” *Id.* at 9. Indeed, while respondents confess to “mistakes” and give lip service to “accept[ing] accountability,” *id.* at 8–9, they steadfastly maintain that their conduct did not violate the Model Rules or rise to the level of “conduct before the court that is unbecoming a member of the bar of this court,” *see id.* at 9 (quoting RCFC 83.2(c)(5)) (“[W]e submit that Ms. Parks and Ms. Masseoud have not violated any disciplinary rule.”); *see also* ECF No. 4 at 11–12 (arguing that nothing they did violated “any disciplinary rule” or RCFC 83.2(c)(5)).

However, showing remorse requires acknowledging a wrong was committed and expressing contrition. *See McKune*, 536 U.S. at 40 (noting the Supreme Court often gives “dispositive weight” to whether a disbarred attorney has “admitted his guilt and expressed contrition” on an application for reinstatement). By simply expressing regret and not admitting to any violation of rules, respondents have failed to meaningfully acknowledge wrongdoing. To the contrary, respondents’ attempts to minimize their actions leave the Standing Panel unconvinced that respondents fully understand their obligations under the Model Rules, including the duty of candor they owe the Court. With respect to Ms. Masseoud in particular, who did not seem to appreciate why she needed to correct false and misleading statements made to the Court by herself and Ms. Parks, there is no reason to believe she has already learned from this experience and will, without discipline from the Standing Panel, avoid such conduct in the future.

Because Ms. Masseoud’s and Ms. Parks maintain essentially that they have done nothing wrong, the Standing Panel finds that they have not expressed remorse sufficient to be considered a mitigating factor. Instead, the Standing Panel is troubled by respondents’ failure to appreciate the egregiousness of their misconduct and acknowledge their wrongdoing. Therefore, the Standing Panel finds this lack of remorse to be an aggravating factor.

¹⁶ Both respondents, through counsel, at times, have made expressions of regret, but not remorse. *See, e.g.*, ECF No. 4 at 6 (“Both Ms. Masseoud and Ms. Parks deeply regret that they supplied incorrect information about Ms. Masseoud’s New York licensure.”). During her testimony, Ms. Parks also expressed regret multiple times for the circumstances that led to this matter. For example, she stated:

[W]e deeply regret this. We hope that we can continue to access this Court. We will do everything possible and we acted as quickly as possible in making corrections to those items that we are aware of. And you can be assured that my next step will be to [take corrective action].

ECF No. 8 at 79:18–23; *see also id.* at 74:8 (voicing regret for website misrepresentations), 88:19–20 (expressing regret for delaying Ms. Masseoud’s bar application).

2. Pattern of Misconduct Over a Long Period of Time

Moreover, the Standing Panel finds as an aggravating factor that respondents engaged in a pattern of misconduct over a long period of time. The conduct described herein was not limited to an isolated incident. As described, the record evinces a pattern of false or misleading statements to the Court spanning several years, from 2022 to 2025. *See* ECF No. 4 at 50 (Ms. Parks' April 2022 email to Judge Holte's chambers); *id.* at 57–58 (Ms. Masseoud's May 2024 email to Judge Horn's chambers); *id.* at 23 (Ms. Parks' May 2025 motion for leave of counsel to participate in oral argument before Judge Schwartz). Review of archived versions of respondents' law firm website likewise reveals that false representations concerning Ms. Masseoud's bar admissions were publicly posted for multiple years, from at least December 2021 until October 2025.

C. Discipline Is Appropriate

In light of the foregoing, the Standing Panel finds that discipline is warranted. The longstanding nature of the identified misconduct weighs heavily in favor of discipline, as does the fact that the misrepresentations at issue in this case were seemingly made with a dishonest or selfish motive to obtain permission to argue before the Court and solicit business from potential clients. With respect to Ms. Masseoud, who violated the duty of candor, engaged in dishonest conduct, and made false and misleading communications to the public regarding her services via the law firm website, the seriousness of her misconduct and the balance of mitigating and aggravating circumstances warrants a six-month suspension. Similarly, with respect to Ms. Parks, who violated the duty of candor and neglected her responsibilities as a partner with managerial authority over Ms. Masseoud, the balance of mitigating and aggravating circumstances also warrants a six-month suspension.

VIII. CONCLUSION

For the foregoing reasons, the Standing Panel finds that Ms. Masseoud and Ms. Parks engaged in “conduct . . . unbecoming a member of the bar” under RCFC 83.2(c)(5). To protect the integrity and standing of the bar as well as the public interest, Hadeel Masseoud and Diana Parks are hereby **SUSPENDED** from the practice of law before the United States Court of Federal Claims for six months. In addition, within **fourteen days** of the issuance of this decision, respondents **SHALL** notify their clients and all other jurisdictions in which they are licensed of the imposed discipline. Pursuant to RCFC 83.2(h)(7), the Clerk of the Court is **DIRECTED** to notify the National Disciplinary Data Bank of the discipline imposed by the Standing Panel against respondents in this final order. The filing of a petition for reinstatement shall be governed by RCFC 83.2(k)(1).

IT IS SO ORDERED.

s/ Thompson M. Dietz
THOMPSON M. DIETZ
Judge

s/ Philip S. Hadji
PHILIP S. HADJI
Judge

s/ Zachary N. Somers
ZACHARY N. SOMERS
Judge