


ORIGINAL

<p>Counsel for the State Bar THE STATE BAR OF CALIFORNIA OFFICE OF THE CHIEF TRIAL COUNSEL ENFORCEMENT KIMBERLY G. ANDERSON, NO. 150359 1149 SOUTH HILL STREET LOS ANGELES, CA 90015-2299 TELEPHONE: (213) 765-1000</p>	<p>Case number(s) 99-0-13363</p> <p>PUBLIC MATTER</p> <p>NOT FOR PUBLICATION</p>	<p>(for Court's use)</p> <p>FILED <i>fm</i></p> <p>APR 30 2001</p> <p>STATE BAR COURT CLERK'S OFFICE SAN FRANCISCO</p> <p>kwiktag® 183 824 700</p> 
<p>Counsel for Respondent THEODORE COHEN 9952 SANTA MONICA BOULEVARD BEVERLY HILLS, CA 90212 (310) 271-7164</p>	<p>Submitted to <input checked="" type="checkbox"/> assigned judge <input type="checkbox"/> settlement judge</p> <p>STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND ORDER APPROVING</p> <p>REPROVAL <input checked="" type="checkbox"/> PRIVATE <input type="checkbox"/> PUBLIC</p> <p><input type="checkbox"/> PREVIOUS STIPULATION REJECTED</p>	
<p>In the Matter of ZO TAYLOR - REES</p> <p>Bar # 69309</p> <p>A Member of the State Bar of California (Respondent)</p>		

A. Parties' Acknowledgments:

- (1) Respondent is a member of the State Bar of California, admitted JUNE 25, 1976
(date)
- (2) The parties agree to be bound by the factual stipulations contained herein even if conclusions of law or disposition are rejected or changed by the Supreme Court.
- (3) All investigations or proceedings listed by case number in the caption of this stipulation are entirely resolved by this stipulation, and are deemed consolidated. Dismissed charge(s)/count(s) are listed under "Dismissals." The stipulation and order consist of 8 pages.
- (4) A statement of acts or omissions acknowledged by Respondent as cause or causes for discipline is included under "Facts."
- (5) Conclusions of law, drawn from and specifically referring to the facts are also included under "Conclusions of Law."
- (6) No more than 30 days prior to the filing of this stipulation, Respondent has been advised in writing of any pending investigation/proceeding not resolved by this stipulation, except for criminal investigations.
- (7) Payment of Disciplinary Costs—Respondent acknowledges the provisions of Bus. & Prof. Code §§6086.10 & 6140.7. (Check one option only):
 - ☐ costs added to membership fee for calendar year following effective date of discipline (public reproof)
 - ☒ case ineligible for costs (private reproof)
 - ☐ costs to be paid in equal amounts for the following membership years:
(hardship, special circumstances or other good cause per rule 284, Rules of Procedure)
 - ☐ costs waived in part as set forth under "Partial Waiver of Costs"
 - ☐ costs entirely waived

Note: All information required by this form and any additional information which cannot be provided in the space provided, shall be set forth in the text component of this stipulation under specific headings, i.e. "Facts," "Dismissals," "Conclusions of Law."

(6) The parties understand that:

- (a) A private reproof imposed on a respondent as a result of a stipulation approved by the Court prior to initiation of a State Bar Court proceeding is part of the respondent's official State Bar membership records, but is not disclosed in response to public inquiries and is not reported on the State Bar's web page. The record of the proceeding in which such a private reproof was imposed is not available to the public except as part of the record of any subsequent proceeding in which it is introduced as evidence of a prior record of discipline under the Rules of Procedure of the State Bar.
- (b) A private reproof imposed on a respondent after initiation of a State Bar Court proceeding is part of the respondent's official State Bar membership records, is disclosed in response to public inquiries and is reported as a record of public discipline on the State Bar's web page.
- (c) A public reproof imposed on a respondent is publicly available as part of the respondent's official State Bar membership records, is disclosed in response to public inquiries and is reported as a record of public discipline on the State Bar's web page.

B. Aggravating Circumstances [for definition, see Standards for Attorney Sanctions for Professional Misconduct, standard 1.2(b)]. Facts supporting aggravating circumstances are required.

(1) ☐ Prior record of discipline [see standard 1.2(f)]

(a) ☐ State Bar Court case # of prior case _____

(b) ☐ Date prior discipline effective _____

(c) ☐ Rules of Professional Conduct/ State Bar Act violations: _____

(d) ☐ degree of prior discipline _____

(e) ☐ If Respondent has two or more incidents of prior discipline, use space provided below or under "Prior Discipline".

(2) ☐ Dishonesty: Respondent's misconduct was surrounded by or followed by bad faith, dishonesty, concealment, overreaching or other violations of the State Bar Act or Rules of Professional Conduct.

(3) ☐ Trust Violation: Trust funds or property were involved and Respondent refused or was unable to account to the client or person who was the object of the misconduct for improper conduct toward said funds or property.

(4) ☐ Harm: Respondent's misconduct harmed significantly a client, the public or the administration of justice.

- (5) ☐ Indifference: Respondent demonstrated indifference toward rectification of or atonement for the consequences of his or her misconduct.
- (6) ☐ Lack of Cooperation: Respondent displayed a lack of candor and cooperation to victims of his/her misconduct or to the State Bar during disciplinary investigation or proceedings.
- (7) ☐ Multiple/Pattern of Misconduct: Respondent's current misconduct evidences multiple acts of wrongdoing or demonstrates a pattern of misconduct.
- (8) ☒ No aggravating circumstances are involved.

Additional aggravating circumstances:

C. Mitigating Circumstances [see standard 1.2(e)]. Facts supporting mitigating circumstances are required.

- (1) ☒ No Prior Discipline: Respondent has no prior record of discipline over many years of practice coupled with present misconduct which is not deemed serious.
- (2) ☐ No Harm: Respondent did not harm the client or person who was the object of the misconduct.
- (3) ☐ Candor/Cooperation: Respondent displayed spontaneous candor and cooperation to the victims of his/her misconduct and to the State Bar during disciplinary investigation and proceedings.
- (4) ☐ Remorse: Respondent promptly took objective steps spontaneously demonstrating remorse and recognition of the wrongdoing, which steps were designed to timely atone for any consequences of his/her misconduct.
- (5) ☐ Restitution: Respondent paid \$ _____ on _____ in restitution to _____ without the threat or force of disciplinary, civil or criminal proceedings.
- (6) ☐ Delay: These disciplinary proceedings were excessively delayed. The delay is not attributable to Respondent and the delay prejudiced him/her.
- (7) ☐ Good Faith: Respondent acted in good faith.
- (8) ☐ Emotional/Physical Difficulties: At the time of the stipulated act or acts of professional misconduct Respondent suffered extreme emotional difficulties or physical disabilities which expert testimony would establish was directly responsible for the misconduct. The difficulties or disabilities were not the product of any illegal conduct by the member, such as illegal drug or substance abuse, and Respondent no longer suffers from such difficulties or disabilities.
- (9) ☐ Severe Financial Stress: At the time of the misconduct, Respondent suffered from severe financial stress which resulted from circumstances not reasonably foreseeable or which were beyond his/her control and which were directly responsible for the misconduct.
- (10) ☐ Family Problems: At the time of the misconduct, Respondent suffered extreme difficulties in his/her personal life which were other than emotional or physical in nature.
- (11) ☐ Good Character: Respondent's good character is attested to by a wide range of references in the legal and general communities who are aware of the full extent of his/her misconduct.

- (12) ☐ Rehabilitation: Considerable time has passed since the acts of professional misconduct occurred followed by convincing proof of subsequent rehabilitation.
- (13) ☐ No mitigating circumstances are involved.

Additional mitigating circumstances:

D. Discipline:

- (1) ☒ Private reproof (check applicable conditions, if any, below)
- (a) ☐ Approved by the Court prior to initiation of the State Bar Court proceedings (no public disclosure).
- (b) ☒ Approved by the Court after initiation of the State Bar Court proceedings (public disclosure).

or

- (2) ☐ Public reproof (check applicable conditions, if any, below)

E. Conditions Attached to Reproof:

- (1) ☒ Respondent shall comply with the conditions attached to the reproof for a period of TWO (2) YEARS.
- (2) ☒ During the condition period attached to the reproof, Respondent shall comply with the provisions of the State Bar Act and Rules of Professional Conduct.
- (3) ☒ Within ten (10) days of any change, Respondent shall report to the Membership Records Office and to the Probation Unit, all changes of information, including current office address and telephone number, or other address for State Bar purposes, as prescribed by section 6002.1 of the Business and Professions Code.
- (4) ☒ Respondent shall submit written quarterly reports to the Probation Unit on each January 10, April 10, July 10, and October 10 of the condition period attached to the reproof. Under penalty of perjury, respondent shall state whether respondent has complied with the State Bar Act, the Rules of Professional Conduct, and all conditions of the reproof during the preceding calendar quarter. If the first report would cover less than thirty (30) days, that report shall be submitted on the next following quarter date and cover the extended period.

In addition to all quarterly reports, a final report, containing the same information, is due no earlier than twenty (20) days before the last day of the condition period and no later than the last day of the condition period.

- (5) ☐ Respondent shall be assigned a probation monitor. Respondent shall promptly review the terms and conditions of probation with the probation monitor to establish a manner and schedule of compliance. During the period of probation, respondent shall furnish such reports as may be requested, in addition to quarterly reports required to be submitted to the Probation Unit. Respondent shall cooperate fully with the monitor.
- (6) ☒ Subject to assertion of applicable privileges, Respondent shall answer fully, promptly and truthfully any inquiries of the Probation Unit of the Office of the Chief Trial Counsel and any probation monitor assigned under these conditions which are directed to Respondent personally or in writing relating to whether Respondent is complying or has complied with the conditions attached to the reproof.
- (7) ☒ Within one (1) year of the effective date of the discipline herein, respondent shall provide to the Probation Unit satisfactory proof of attendance of the Ethics School and passage of the test given at the end of that session.
- ☐ No Ethics School ordered.
- (8) ☐ Respondent shall comply with all conditions of probation imposed in the underlying criminal matter and shall so declare under penalty of perjury in conjunction with any quarterly report required to be filed with the Probation Unit.
- (9) ☒ Respondent shall provide proof of passage of the Multistate Professional Responsibility Examination ("MPRE"), administered by the National Conference of Bar Examiners, to the Probation Unit of the Office of the Chief Trial Counsel within one year of the effective date of the reproof.
- ☐ No MPRE ordered.
- (10) ☐ The following conditions are attached hereto and incorporated:
- ☐ Substance Abuse Conditions ☐ Law Office Management Conditions
- ☐ Medical Conditions ☐ Financial Conditions
- (11) ☒ Other conditions negotiated by the parties:
- Within one year of the effective date of its discipline herein, Respondent shall submit to the probation unit satisfactory evidence of completion of no less than 6 hours of participatory (not self study) MCLE approved courses in law office management, attorney client relations and/or general legal ethics. This requirement is separate and apart from any Minimum Continuing Legal Education (MCLE) requirement, and Respondent shall not receive MCLE credit for attending these courses (Rule 3201, Rules of Procedure of the State Bar.) This requirement is separate and independent of the Ethics School requirement.

ATTACHMENT TO

STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION

IN THE MATTER OF: ZO TAYLOR-REES

CASE NUMBER: 99-O-13363

FACTS AND CONCLUSIONS OF LAW.

1. On or about June 8, 1999, Zo Taylor-Rees ("Respondent") was employed by Joyce Lugo ("Lugo") to appeal through arbitration Lugo's termination from employment with the City of Rialto Police Department.

2. On June 8, 1999, Lugo paid Respondent \$1,000.00 in advanced fees.

3. Thereafter, Respondent failed to promptly pursue arbitration proceedings on behalf of Lugo, failed to select an arbitrator and failed to select an arbitration hearing date in accordance with the Rialto Police Department's Memorandum of Understanding.

4. From June 1999 through the end of September 1999, Lugo telephoned Respondent a number of times to inquire about the status of her case. In the few telephone conversations Respondent had with Lugo, she misrepresented to Lugo that she had drafted documents on Lugo's behalf when in fact Respondent did not perform any work on Lugo's case.

5. On November 17, 1999, Lugo wrote to Respondent requesting an accounting for the \$1,000.00 in advanced legal fees. Respondent failed to respond to the letter, failed to provide an accounting, and failed to promptly return unearned fees to Lugo. Respondent did ultimately return the \$1,000.00 to Lugo on or about August 3, 2000.

6. By the foregoing conduct, Respondent wilfully violated Rule 3-110(A) of the Rules of Professional Conduct, Business and Professions Code, section 6068(m), and Rule 3-700(D)(2) of the Rules of Professional Conduct.

PENDING PROCEEDINGS.

The disclosure date referred to, on page one, paragraph A.(6), was made on April 10, 2001.

DISMISSALS.

The State Bar moves to dismiss Count Four of the Notice of Disciplinary Charges, which alleges Respondent failed to cooperate in a State Bar investigation in violation of Business and Professions Code, section 6068(i) as part of the stipulation in this matter.

POINTS AND AUTHORITIES SUPPORTING LEVEL OF DISCIPLINE.

Standard 2.4(b) of the Standards for Attorney Sanctions for Professional Misconduct provides for reproof or suspension where a member fails to communicate or fails to perform competent legal services in an individual matter or matters not demonstrating a pattern of misconduct.

Standard 2.10 is applicable to a failure to promptly return unearned fees. It also provides for reproof or suspension depending upon the gravity of the offense or harm if any to the client.

Date 4-21-01

Lo Taylor-Rees
Respondent's signature

ZO TAYLOR - REES
print name

Date 7/23

[Signature]
Respondent's Counsel's signature

THEODORE COHEN
print name

Date 4/25/01

[Signature]
Deputy Trial Counsel's signature

KIMBERLY G. ANDERSON
print name

ORDER

Finding that the stipulation protects the public and that the interests of Respondent will be served by any conditions attached to the reproof, IT IS ORDERED that the requested dismissal of counts/charges, if any, is GRANTED without prejudice, and:



The stipulated facts and disposition are APPROVED AND THE REPROVAL IMPOSED.



The stipulated facts and disposition are APPROVED AS MODIFIED as set forth below, and the REPROVAL IMPOSED.

The parties are bound by the stipulation as approved unless: 1) a motion to withdraw or modify the stipulation, filed within 15 days after service of this order, is granted; or 2) this court modifies or further modifies the approved stipulation. (See rule 135(b), Rules of Procedure.) Otherwise the stipulation shall be effective 15 days after service of this order.

Failure to comply with any conditions attached to this reproof may constitute cause for a separate proceeding for willful breach of rule 1-110, Rules of Professional Conduct.

Date 4/30/01

[Signature]
Judge of the State Bar Court

CERTIFICATE OF SERVICE
[Rule 62(b), Rules Proc.; Code Civ. Proc., § 1013a(4)]

I am a Case Administrator of the State Bar Court. I am over the age of eighteen and not a party to the within proceeding. Pursuant to standard court practice, in the City and County of San Francisco, on April 30, 2001, I deposited a true copy of the following document(s):

**STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION
AND ORDER APPROVING**

in a sealed envelope for collection and mailing on that date as follows:

- [X] by first-class mail, with postage thereon fully prepaid, through the United States Postal Service at San Francisco, California, addressed as follows:

**THEODORE A COHEN
9952 SANTA MONICA BLVD
BEVERLY HILLS CA 90212**

- [X] by interoffice mail through a facility regularly maintained by the State Bar of California addressed as follows:

KIMBERLY ANDERSON , Enforcement, Los Angeles

I hereby certify that the foregoing is true and correct. Executed in San Francisco, California, on **April 30, 2001.**



Bernadette C.O. Molina
Case Administrator
State Bar Court

FILED

DEC 21 2000

STATE BAR COURT
CLERKS OFFICE
LOS ANGELES

1 ZO TAYLOR-REES
2 8301 Utica Avenue #201
3 Rancho Cucamonga, California 91730
4 (909) 484-2666: FAX 484-2669

5
6
7
8 IN PRO PER

9 THE CALIFORNIA STATE BAR
10 OF THE STATE BAR OF CALIFORNIA
11 HEARING DEPARTMENT - LOS ANGELES

12 In re the Matter of:) No. 99-0-13363
13 ZO TAYLOR-REES,)
14 No. 69309) **ANSWER TO STATE BAR'S**
15 a Member of the State Bar.) **DISCIPLINARY CHARGES**
16 _____)
17 _____)

18 COMES NOW Respondent in Answer to the Disciplinary Charges
19 filed in the above entitled matter as follows:

20 COUNT ONE

21 Failure to Perform with Competence (rule 3-110(A))

22 It is specifically denied that Respondent was employed by
23 Joyce Ann Lugo in or about May, 1999, but was retained in or about
24 June, 1999. The employment was for the specific purpose of
25 conducting an arbitration hearing between Ms. Lugo and the City of
26 Rialto Police Department. Ms. Lugo was represented by her union
27 representative, and the union was to continue the representation
28 until the date of the arbitration hearing, at which time Respondent
was to appear and conduct the hearing.

It is specifically denied that respondent had any obligation
to pursue arbitration. The only obligation was to conduct an

1 arbitration hearing when it was set.

2 All legal services performed were done with competence.

3 COUNT TWO

4 Failure to Respond to Client Inquiries--B&P 6068(m)

5 Respondent incorporates the responses in COUNT ONE.

6 With respect to any communication which Respondent needed to
7 have with Ms. Lugo's Worker's Compensation Attorney, Mr. Gillette,
8 when Ms. Lugo provided a copies of Mr. Gillette's letters there was
9 no longer a need for the communication.

10 The only document which Respondent agreed to produce for Ms.
11 Lugo was in fact provided on September 12, 1999, a letter to the
12 Chief of Police.

13 There was no need to provide any documents to the Union
14 Representative. The union had filed the appeal from the
15 termination and was proceeding to set the matter for arbitration.
16 Respondent was waiting for communication from the union that the
17 arbitration was set so that Respondent could perform her contracted
18 duty.

19 Respondent had office conferences with Ms. Lugo on June 8,
20 July 30, September 17 and 24, and had a lengthy phone conference on
21 August 11 (additional phone calls and communications occurred, but
22 none were of sufficient length to warrant recording for billing
23 purposes). At all times Ms. Lugo was informed and knew that she
24 could set an office appointment, or telephone appointment. Any
25 such appointments which were made, communication occurred.

26 Respondent denies that there was any failure to truthfully
27 inform Ms. Lugo as the status of her case. Respondent was awaiting
28 the setting of the arbitration and was not privy to the status of

1 that setting process. That was in the hands of the union and Ms.
2 Lugo.

3 COUNT THREE

4 Failure to Refund Unearned Fees--rule 3-700(D)(2)

5 Respondent incorporates the responses in COUNT TWO.

6 The refund of all fees was made on three separate occasions.
7 The first two occasions Ms. Lugo apparently refused to cash the
8 checks. A full refund was finally personally delivered to her and
9 she negotiated the check.

10 COUNT FOUR

11 Failure to Cooperate in State Bar Investigation--B&P 6068(i)

12 Respondent incorporates the responses in COUNT THREE.

13 This is denied.

14 The letters allegedly send by Bar Investigator Barnes on
15 February 18 and April 19, 2000 were never received and Respondent
16 has no knowledge concerning them, except has herein stated.

17 On August 7, 2000 Respondent responded to the July 17, 2000
18 letter received from Janice G. Oehrle, Deputy Trial Counsel.

19 Following the letter a telephone conference was had between
20 Respondent and Deputy Oehrle. During the conference an in person
21 meeting was set.

22 On August 21, 2000 Respondent had a 2:00 PM meeting for
23 approximately one hours with Ms. Janice G. Oehrle, Deputy Trial
24 Counsel on this matter. During the meeting Deputy Oehrle
25 acknowledged that an incorrect address for Respondent had been used
26 to originally communicate, prior to July, 2000. After the case had
27 been discussed, Deputy Oehrle informed Respondent that she viewed
28 it as a fee dispute and would note the file.

AFFIRMATIVE DEFENSE

At all times in which Ms. Lugo communicated with Respondent her position was that she wanted to be reinstated in a position with the City of Rialto. It was discovered by Respondent in a meeting with Ms. Lugo on September 17, 1999 that Ms. Lugo applied for PERS disability retirement in March, 1999, and in the beginning of September, 1999 had applied for PERS service retirement which would be started on about September 21, 1999. At that point Ms. Lugo was informed that her arbitration request/appeal was moot.

DATED: December 19, 2000

Zo Taylor-Rees
ZO TAYLOR-REES

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

On December 19, 2000, I served the foregoing document described as:

on all parties listed below in this action by using the described method below and providing a true and correct copy thereof addressed as follows.

OFFICE OF TRIAL COUNSEL fax: 213/765-1383
1149 South Hill Street
Los Angeles, CA. 90015-2299

____/ (BY FAX/TELECOPIER) I caused such documents to be sent via telecopier.

Dated: 12/19/00


T.L. TAGGART

1 THE STATE BAR OF CALIFORNIA
2 OFFICE OF THE CHIEF TRIAL COUNSEL
3 ENFORCEMENT
4 KIMBERLY ANDERSON, No. 150359
5 1149 South Hill Street
6 Los Angeles, California 90015-2299
7 Telephone: (213) 765-1000

ORIGINAL

FILED

DEC 01 2000

STATE BAR COURT
CLERKS OFFICE
LOS ANGELES

8 THE STATE BAR COURT
9 OF THE STATE BAR OF CALIFORNIA
10 HEARING DEPARTMENT - LOS ANGELES

11
12 In the Matter of) Case No. 99-O-13363
13)
14 ZO TAYLOR REES) NOTICE OF DISCIPLINARY CHARGES
15 No. 69309)
16 A Member of the State Bar)

17 **NOTICE - FAILURE TO RESPOND!**

18 **IF YOU FAIL TO FILE AN ANSWER TO THIS NOTICE WITHIN THE TIME**
19 **ALLOWED BY STATE BAR RULES, INCLUDING EXTENSIONS, OR IF**
20 **YOU FAIL TO APPEAR AT THE STATE BAR COURT TRIAL, (1) YOUR**
21 **DEFAULT SHALL BE ENTERED, (2) YOU SHALL BE ENROLLED AS AN**
22 **INVOLUNTARY INACTIVE MEMBER OF THE STATE BAR AND WILL NOT**
23 **BE PERMITTED TO PRACTICE LAW UNLESS THE DEFAULT IS SET**
24 **ASIDE ON MOTION TIMELY MADE UNDER THE RULES OF PROCEDURE**
25 **OF THE STATE BAR, (3) YOU SHALL NOT BE PERMITTED TO**
26 **PARTICIPATE FURTHER IN THESE PROCEEDINGS UNLESS YOUR**
27 **DEFAULT IS SET ASIDE, AND (4) YOU SHALL BE SUBJECT TO**
28 **ADDITIONAL DISCIPLINE.**

24 **STATE BAR RULES REQUIRE YOU TO FILE YOUR WRITTEN RESPONSE**
25 **TO THIS NOTICE WITHIN TWENTY DAYS AFTER SERVICE.**

25 / / /

26 / / /

27 / / /

28 / / /

7. The allegations of paragraphs 3 and 4 are incorporated by reference.

8. Between in or about June 1999 and September 1999, Lugo telephoned and wrote Respondent numerous times inquiring as to the status of her case. In the few telephone conversation that Respondent had with Lugo, Respondent misrepresented to Lugo that she had drafted documents on Lugo's behalf that would be sent out to Lugo's union representative and to her workers' compensation attorney with copies to Lugo. No such work was performed on Lugo's case by Respondent.

9. By failing to truthfully inform Lugo as to the status of her case, Respondent failed to respond promptly to reasonable status inquiries of a client in a matter in which Respondent had agreed to provide legal services.

COUNT THREE

Case No. 99-O-13363
Rules of Professional Conduct, rule 3-700(D)(2)
[Failure to Refund Unearned Fees]

10. Respondent wilfully violated Rules of Professional Conduct, rule 3-700(D)(2), by failing to refund promptly any part of a fee paid in advance that has not been earned, as follows:

11. The allegations of paragraphs 7 and 8 are incorporated by reference.

12. On or about November 17, 1999, Lugo wrote to Respondent requesting an accounting for the \$1,000.00 provided to Respondent as advanced legal fees. Respondent did not reply to this letter and delayed until in or about July 2000 to refund the \$1,000.00 to Lugo.

13. By not promptly refunding the unearned fees to Lugo, Respondent failed to refund promptly any part of a fee paid in advance that has not been earned

///

/ / /

/ / /

/ / /

/ / /

1 NOTICE OF DISCIPLINARY CHARGES WILL BE DEEMED ADMITTED;
2 (2) EVIDENCE THAT WOULD OTHERWISE BE INADMISSIBLE MAY BE
3 USED AGAINST YOU IN THIS PROCEEDING; AND (3) YOU WILL LOSE
4 THE OPPORTUNITY TO PARTICIPATE FURTHER IN THESE
5 PROCEEDINGS, INCLUDING PRESENTING EVIDENCE IN MITIGATION,
6 COUNTERING EVIDENCE IN AGGRAVATION, AND MOVING FOR
7 RECONSIDERATION, UNLESS AND UNTIL YOUR DEFAULT IS SET
8 ASIDE ON MOTION TIMELY MADE UNDER THE PRESCRIBED
9 GROUNDS. SEE RULES 200 ET SEQ., RULES OF PROCEDURE FOR
10 STATE BAR COURT PROCEEDINGS.

11 IF YOUR DEFAULT IS ENTERED AND THE DISCIPLINE IMPOSED BY
12 THE SUPREME COURT IN THIS PROCEEDING INCLUDES A PERIOD OF
13 ACTUAL SUSPENSION, YOU WILL REMAIN SUSPENDED FROM THE
14 PRACTICE OF LAW FOR AT LEAST THE PERIOD OF TIME SPECIFIED
15 BY THE SUPREME COURT. IN ADDITION, THE ACTUAL SUSPENSION
16 WILL CONTINUE UNTIL YOU HAVE REQUESTED, AND THE STATE BAR
17 COURT HAS GRANTED, A MOTION FOR TERMINATION OF THE
18 ACTUAL SUSPENSION. AS A CONDITION FOR TERMINATING THE
19 ACTUAL SUSPENSION, THE STATE BAR COURT MAY PLACE YOU ON
20 PROBATION AND REQUIRE YOU TO COMPLY WITH SUCH CONDITIONS
21 OF PROBATION AS THE STATE BAR COURT DEEMS APPROPRIATE.
22 SEE RULE 205, RULES OF PROCEDURE FOR STATE BAR COURT
23 PROCEEDINGS.

24 **NOTICE - INACTIVE ENROLLMENT!**

25 YOU ARE HEREBY FURTHER NOTIFIED THAT IF THE STATE BAR
26 COURT FINDS, PURSUANT TO BUSINESS AND PROFESSIONS CODE
27 SECTION 6007(c), THAT YOUR CONDUCT POSES A SUBSTANTIAL
28 THREAT OF HARM TO THE INTERESTS OF YOUR CLIENTS OR TO THE
PUBLIC, THAT YOU MAY BE INVOLUNTARILY ENROLLED AS AN
INACTIVE MEMBER OF THE STATE BAR. YOUR INACTIVE
ENROLLMENT WOULD BE IN ADDITION TO ANY DISCIPLINE
RECOMMENDED BY THE COURT. SEE RULE 101(c), RULES OF
PROCEDURE OF THE STATE BAR OF CALIFORNIA.

NOTICE - COST ASSESSMENT!

IN THE EVENT THESE PROCEDURES RESULT IN PUBLIC DISCIPLINE,
YOU MAY BE SUBJECT TO THE PAYMENT OF COSTS INCURRED BY
THE STATE BAR IN THE INVESTIGATION, HEARING AND REVIEW OF
THIS MATTER PURSUANT TO BUSINESS AND PROFESSIONS CODE
SECTION 6086.10. SEE RULE 280, RULES OF PROCEDURE OF THE
STATE BAR OF CALIFORNIA.

Respectfully submitted,

THE STATE BAR OF CALIFORNIA
OFFICE OF THE CHIEF TRIAL COUNSEL

By: 

David C. Carr
Assistant Chief Trial Counsel

Dated: December 1, 2000

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27

I, the undersigned, over the age of eighteen (18) years, whose business address and place of employment is the State Bar of California, 1149 South Hill Street, Los Angeles, California 90015, declare that I am not a party to the within action; that I am readily familiar with the State Bar of California's practice for collection and processing of correspondence for mailing with the United States Postal Service; that in the ordinary course of the State Bar of California's practice, correspondence collected and processed by the State Bar of California would be deposited with the United States Postal Service that same day; that I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing affidavit. That in accordance with the practice of the State Bar of California for collection and processing of mail, I deposited or placed for collection and mailing in the City and County of Los Angeles, on the date shown below, a true copy of the within

in a sealed envelope placed for collection and mailing as certified mail, return receipt requested, Article No.: **P 970 274 941**, at Los Angeles, on the date shown below, addressed to:

in an inter-office mail facility regularly maintained by the State Bar of California addressed to:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Los Angeles, California, on the date shown below.

SIGNED:

LETICIA M. RAMOS
Declarant



The document to which this certificate is affixed is a full, true and correct copy of the original on file and of record in the State Bar Court.

ATTEST March 30, 2015

State Bar Court, State Bar of California,
Los Angeles

By



Clerk