


<p>Counsel for the State Bar THE STATE BAR OF CALIFORNIA OFFICE OF THE CHIEF TRIAL COUNSEL CHARLES A. MURRAY, #146069 1149 South Hill Street Los Angeles, California 90015 (213) 765-1000</p>	<p>Case number(s) 02-C-15841-RMT</p>	<p>(for Court's use) PUBLIC MATTER FILED JUL 31 2003 STATE BAR COURT CLERKS OFFICE LOS ANGELES</p>
<p>Counsel for Respondent EDWARD Lear, #132699 CENTURY LAW GROUP 5200 West Century Boulevard, #940 Los Angeles, California 90045 (310) 642-6900</p>	<p>kwiktag® 031 975 035 </p>	
<p>In the Matter of SUZANNE MASHREGHY Bar # 162594 A Member of the State Bar of California (Respondent)</p>	<p>Submitted to <input checked="" type="checkbox"/> assigned judge <input type="checkbox"/> settlement judge STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND ORDER APPROVING ACTUAL SUSPENSION <input type="checkbox"/> PREVIOUS STIPULATION REJECTED</p>	

A. Parties' Acknowledgments:

- (1) Respondent is a member of the State Bar of California, admitted December 14, 1992
 (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 11 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):
 - until costs are paid in full, Respondent will remain actually suspended from the practice of law unless relief is obtained per rule 284, Rules of Procedure.
 - costs to be paid in equal amounts prior to February 1 for the following membership years:
2004 & 2005.
 (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."

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 96-0-02176

(b) date prior discipline effective September 27, 1998

(c) Rules of Professional Conduct/ State Bar Act violations: Business and Professions Code,

Section 6068(a) and 6103 for issuing NSF check and subsequently refusing to honor

a court judgement with respect to payment of that debt.

(d) degree of prior discipline 3 months stayed suspension; 1 year probation

(e) If Respondent has two or more incidents of prior discipline, use space provided below or under "Prior Discipline". 96-0-04881, effective October 22, 2000; violation of rule 4-100(a) of the Rules of Professional Conduct for failing to maintain client funds in a trust account, unilaterally determining her fee and taking that sum from the trust account. Discipline=6 month stayed suspension; one year probation.

(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. Stayed Suspension.

A. Respondent shall be suspended from the practice of law for a period of four (4) years;

- i. and until Respondent shows proof satisfactory to the State Bar Court of rehabilitation and present fitness to practice and present learning and ability in the law pursuant to standard 1.4(c)(ii), Standards for Attorney Sanctions for Professional Misconduct
- ii. and until Respondent pays restitution to _____ [payee(s)] (or the Client Security Fund, if appropriate), in the amount of _____, plus 10% per annum accruing from _____ and provides proof thereof to the Probation Unit, Office of the Chief Trial Counsel
- iii. and until Respondent does the following: _____

B. The above-referenced suspension shall be stayed.

2. Probation.

Respondent shall be placed on probation for a period of four (4) years; which shall commence upon the effective date of the Supreme Court order herein. (See rule 953, California Rules of Court.)

3. Actual Suspension.

A. Respondent shall be actually suspended from the practice of law in the State of California for a period of two (2) years;

- i. and until Respondent shows proof satisfactory to the State Bar Court of rehabilitation and present fitness to practice and present learning and ability in the law pursuant to standard 1.4(c)(ii), Standards for Attorney Sanctions for Professional Misconduct
- ii. and until Respondent pays restitution to _____ [payee(s)] (or the Client Security Fund, if appropriate), in the amount of _____, plus 10% per annum accruing from _____ and provides proof thereof to the Probation Unit, Office of the Chief Trial Counsel
- iii. and until Respondent does the following: _____

E. Additional Conditions of Probation:

- (1) If Respondent is actually suspended for two years or more, he/she shall remain actually suspended until he/she proves to the State Bar Court his/her rehabilitation, fitness to practice, and learning and ability in general law, pursuant to standard 1.4(c)(ii), Standards for Attorney Sanctions for Professional Misconduct.
- (2) During the probation period, 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 of the State Bar 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 period of probation. 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 probation during the preceding calendar quarter. The first report would cover less than 30 days, that report shall be submitted on the next 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 period of probation and no later than the last day of probation.

- (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 to the monitor such reports as may be requested, in addition to the quarterly reports required to be submitted to the Probation Unit. Respondent shall cooperate fully with the probation 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 probation conditions.
- (7) Within one (1) year of the effective date of the discipline herein, respondent shall provide to the Probation Unit satisfactory proof of attendance at a session of the Ethics School, and passage of the test given at the end of that session.
- No Ethics School recommended.
- (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 to be filed with the Probation Unit.
- (9) The following conditions are attached hereto and incorporated:
- | | |
|---|---|
| <input checked="" type="checkbox"/> Substance Abuse Conditions
SEE PAGE 10 | <input type="checkbox"/> Law Office Management Conditions |
| <input type="checkbox"/> Medical Conditions | <input type="checkbox"/> Financial Conditions |
- (10) Other conditions negotiated by the parties:
- Multistate Professional Responsibility Examination: 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 during the period of actual suspension or within one year, whichever period is longer. Failure to pass the MPRE results in actual suspension without further hearing until passage. But see rule 951(b), California Rules of Court, and rule 321(a)(1) & (c), Rules of Procedure.
- No MPRE recommended.
- Rule 955, California Rules of Court: Respondent shall comply with the provisions of subdivisions (a) and (c) of rule 955, California Rules of Court, within 30 and 40 days, respectively, from the effective date of the Supreme Court order herein.
- Conditional Rule 955, California Rules of Court: If Respondent remains actually suspended for 90 days or more, he/she shall comply with the provisions of subdivisions (a) and (c) of rule 955, California Rules of Court, within 120 and 130 days, respectively, from the effective date of the Supreme Court order herein.
- Credit for Interim Suspension [conviction referral cases only]: Respondent shall be credited for the period of his/her interim suspension toward the stipulated period of actual suspension. Respondent was placed on suspension effective February 25, 2003.

ATTACHMENT TO
STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION

IN THE MATTER OF: **SUZANNE MASHREGHY ("Respondent"), #162594**

CASE NUMBER: **02-C-15184-RMT**

PENDING PROCEEDINGS.

The disclosure date referred to, on page one, paragraph A.(6), was July 18, 2003.

PARTIES ARE BOUND BY THE STIPULATED FACTS:

The parties intend to be and are hereby bound by the stipulated facts contained in this stipulation. This stipulation as to facts and the facts so stipulated shall independently survive even if the conclusions of law and/or stipulated disposition set forth herein are rejected or changed in any manner whatsoever by the Hearing Department or the Review Department of the State Bar Court, or by the California Supreme Court.

WAIVER OF FINALITY OF CONVICTION (rule 607):

Pursuant to the Rules of Procedure of the State Bar of California, rule 607 the parties stipulate that the Court may decide the issues as to the discipline to be imposed even if the criminal convictions discussed herein are not final.

Respondent waives finality of her conviction and consents to the State Bar Court's acceptance of this Stipulation as to facts, conclusions of law and discipline in all respects as if the conviction was final, including the entry of findings consistent with this Stipulation, imposition of discipline, or entry of a recommendation as to the degree of the discipline to be imposed.

Respondent waives any right to challenge on the basis of a lack of finality of her conviction the State Bar Court's recommendation of discipline, if any, and the actual imposition of discipline, if any, by the State Bar Court or the California Supreme Court.

Respondent further waives any right she may have to seek review or reconsideration on the basis of any relief he may receive as a result of any appeal of, or petition regarding, the criminal conviction underlying any recommendation of and/or actual imposition of discipline by the State Bar Court or the California Supreme Court.

STIPULATION AS TO FACTS AND CONCLUSIONS OF LAW.

Respondent admits that the following facts are true and that she is culpable of violations of the specified statues and/or Rules of Professional Conduct, or has otherwise committed acts of misconduct warranting discipline:

STIPULATED FACTS:

Respondent's mother died in 1989. At that time Respondent's mother was receiving monthly payment of Social Security Administration Supplemental Security Income checks ("checks") from

the United States Social Security Administration (SSA). The SSA should have been notified of her death and the payment of the checks should have ceased at that time. However, the SSA was not notified of her death and payment of the checks continued. Respondent knew at least by 1996 that her mother had died in 1989 and yet she cashed or deposited the checks in her own account, and used the money for her own purposes

Respondent was charged in a multi-count indictment by a federal grand jury in August 1999 [*United States v. Susan Negahbani*, United States District Court for the Central District of California, Case No. 99-854-RSWL]. Each count of the indictment alleged that Respondent committed theft of government property, to wit: the checks payable to her deceased mother from the United States Treasury on behalf of the SSA.

On January 28, 2000, Respondent entered into a Plea Agreement with the United States Attorney's Office, agreeing to plead guilty to two counts of Theft of Government Money or Property, 18 U.S.C. § 641. The Plea Agreement recited that the following must be true for each count: (1) Respondent stole money or property of value with the intention of depriving the owner of the use or benefit of the money or property; and (2) the money or property belonged to the United States.

In the Plea Agreement Respondent also agreed that the amount of restitution to be paid was not restricted to the amounts alleged in the counts to which she plead guilty and could include losses arising from counts dismissed or not prosecuted pursuant to the agreement as well as all relevant conduct in connection with those counts and charges. The two counts to which Respondent specifically plead guilty were for individual thefts in the amounts of \$626.40 each. Respondent knew at least by 1996 that her mother had died in 1989 and yet she cashed or deposited the checks in her own account, and used the money for her own purposes. The total amount of all such checks deposited or cashed by Respondent, minus the amounts reclaimed by the U.S. Treasury from Respondent's accounts, was \$48,478.80. Respondent agreed that the applicable amount of restitution was \$48,478.80.

On May 15, 2000, Respondent formally plead guilty to the two crimes described above. She was sentenced the same day to commitment in the custody of the Bureau of Prisons to be imprisoned for a period of five months in prison and, among other conditions, payment of restitution in the amount of \$48,478.00 to the Social Security Administration. She did not appeal.

On January 23, 2003, the Review Department of State Bar Court filed an order placing Respondent on interim suspension effective February 25, 2003, as a result of her convictions of the above-described crimes, misdemeanors involving moral turpitude, pursuant to Business and Professions Code section 6102 and rule 951(a), California Rules of Court.

Further, in the Review Department's January 23, 2003 order it referred this matter to the Hearing Department pursuant to rule 951(a), California Rules of Court, stating:

The judgment of conviction [of the above-described misdemeanor crimes involving moral turpitude] having become final, and it appearing that the statutory criteria for summary disbarment are not met, the above entitled matter is referred to the Hearing Department for hearing and a decision recommending the discipline to be imposed.

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CONCLUSIONS OF LAW:

The facts and circumstances surrounding Respondent's misdemeanor convictions for Theft of Government Money or Property, in wilful violation of 18 U.S.C. § 641, involve moral turpitude, constitute misconduct warranting discipline, and constitute a wilful violation of Business and Professions Code section 6068(a).

ADDITIONAL RESPONDENT INFORMATION:

Respondent reports that during this time she was experiencing chemical dependency problems, including alcohol, prescription drugs and street drugs. She reports she is now in the process of recovery.

Respondent provided a letter from the program coordinator of Creative Care, Inc., indicating Respondent was attending Alcoholics Anonymous and Narcotics Anonymous meetings as early as 1994, however no frequency or actual sobriety was reported. The letter also indicated that Respondent has been receiving some type of chemical dependency counseling from the that program coordinator since September, 2002.

Respondent provided two letters from a United States Probation Officer to advise that Respondent has been and is currently on supervised release and that throughout the term of her supervised release she has been in compliance with her conditions of supervision. This includes payments of \$100 per month against the \$48,478 she was ordered to pay in restitution. Based on the financial information provided by Respondent, the \$100 per month toward restitution appeared to be commensurate with her ability to pay. The letters did not disclose the total payments to date or the balance remaining to be paid. The letters also stated that Respondent's conditions of supervision include random drug testing, that Respondent has been tested on a random basis throughout the period of supervision, and that all test results returned negative for the use of illegal substances.

Respondent authorized an addictionologist, certified by the American Society of Addiction Medicine, to confirm that he had previously seen Respondent some years ago concerning chemical dependency issues. The addictionologist confirmed that Respondent had chemical dependency issues. However, no medical records or reports, past or current, were produced.

AUTHORITIES SUPPORTING DISCIPLINE:

Standards 1.2, 1.3, 1.4(b), 1.5, 1.6, 1.7, 2.3 and 3.2 of the Standards of Attorney Sanctions for Professional Misconduct, Title IV, of the Rules of Procedure of the State Bar of California.

Standard 3.2 states that conviction of a crime involving moral turpitude¹ by an attorney "shall result in disbarment" unless "the most compelling mitigating circumstances clearly predominate." Disbarment is the rule rather than the exception where attorney is convicted of moral turpitude crime. (In re Bogart (1973) 9 Cal.3d 743, 748.)

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Here, there is no dispute that the underlying conviction was for crimes of moral turpitude. (See Order of Review Dept. dated Jan.23, 2003; accord In re Duchow (1988) 44 Cal.3d 268 (conviction of theft of public money, 18 USC 641, involves moral turpitude).)

Standard 1.7(b) states that where a member has a record of two prior disciplinary matters the member shall be disbarred in the next disciplinary matter, unless "the most compelling mitigating circumstances clearly predominate."

Caselaw re culpability:

A record of a respondent's conviction is conclusive evidence of her guilt of the crime for which she has been convicted. (In re Crooks (1990) 51 Cal.3d 1090, 1097). Moreover, the convicted attorney is conclusively presumed to have committed all of the elements of the crime. (In re Duggan (1976) 17 Cal.3d 416, 423.)

The conclusiveness of respondent's conviction also precludes consideration of defenses to the underlying crime from being raised in State Bar proceedings. (In the Matter of Burns (1995) 3 Cal. State Bar Ct. Rptr. 406, 413.)

The court may consider all facts and circumstances of the attorney's conduct in the underlying crime, but only to determine appropriate discipline; the State Bar Court will not re-try a criminal case to see if the crime was in fact committed. (In re Severo (1986) 41 Cal.3d 493; see also In re Utz (1989) 48 Cal.3d 468 (no collateral attack of the underlying conviction).)

Caselaw re level of discipline:

Stanley: Attorney found to have misappropriated over \$20,000.00 in client funds and committed thirty-odd acts of misconduct including three criminal convictions for crimes involving moral turpitude. Attorney presented significant evidence of mitigation including that the misconduct was caused by drug and alcohol addiction and he had completed in-house treatment for addiction and was on the road to recovery. Attorney had no prior misconduct. Disbarred. (Stanley v. State Bar (1990) 50 Cal.3d 555.)

Kreitenberg: A felony conviction matter which occurred over a six year period where attorney was involved in a capping scheme, fee splitting, and conspiracy to defraud the Internal Revenue Service in violation of 18 U.S.C. section 371, acts of moral turpitude. Attorney had no prior record of discipline. Disbarred. (In re Kreitenberg (Rev. Dept. 2002)).

Lybbert: Attorney convicted of one count of welfare fraud after he signed his name under penalty of perjury to 15 monthly welfare forms which deliberately omitted mention of income which would have disqualified his family from receiving some of their welfare benefits. Even though there were no priors, the attorney received 24 months actual suspension. (In re Lybbert (Rev. Dept. 1993) 2 Cal. State Bar Ct. Rptr. 297.)

Very little weight in mitigation is to be given where attorney has only a few years of practice without discipline. (E.g., Cannon v. State Bar (1990) 51 Cal.3d 1103 (six years not enough); In re Dyson (Rev. Dept. 1990) 1 Cal. State Bar Ct. Rptr. 280 (eight years not enough).)

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SUBSTANCE ABUSE CONDITIONS:

LAP Evaluation:

- No later than thirty (30) days after the effective date of the discipline in this matter, if she has not done so already, Respondent shall:
 - report to the Lawyer Assistance Program of the State Bar of California (LAP) for an evaluation regarding substance abuse and mental health issues;
 - sign a written agreement with LAP to be evaluated; and,
 - sign a waiver directing and authorizing LAP to timely notify the Probation Unit of her compliance and noncompliance with the terms and conditions of his LAP evaluation agreement, according to the protocol for such reporting developed by the LAP and the State Bar Court.

Respondent shall provide satisfactory evidence of such compliance to the Probation Unit, according to the protocol for such reporting compliance developed by the LAP and the State Bar Court.

- Respondent shall comply with the terms and conditions of her LAP evaluation agreement.

With each written report required pursuant to this order, Respondent shall provide satisfactory evidence of such compliance to the Probation Unit, according to the protocol for such reporting developed by the LAP and the State Bar Court.

LAP Participation:

- At the conclusion of her evaluation by LAP, Respondent shall sign enter into a LAP participation agreement with the LAP and she shall sign a waiver directing and authorizing LAP to timely notify the Probation Unit of her compliance and noncompliance with the terms and conditions of her LAP participation agreement, according to the protocol for such reporting developed by the LAP and the State Bar Court.

Within ten (10) days of signing her LAP participation agreement, Respondent shall provide satisfactory evidence of such compliance to the Probation Unit, according to the protocol for such reporting developed by the LAP and the State Bar Court.

- Respondent shall remain in compliance with all treatment and monitoring terms and conditions of her LAP participation agreement, whether as initially agreed to or as LAP may change or modify those conditions thereafter.

With each written report required pursuant to this order, Respondent shall provide satisfactory evidence of such compliance to the Probation Unit, according to the protocol for such reporting developed by the LAP and the State Bar Court.

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Date 7/29/03

Respondent's signature

Plaintiff's name

Edward Lear

print name

Charles A. Murray

print name

Date 7/29/03

Respondent's Counsel's signature

Date 7/31/03

Deputy Trial Counsel's signature

ORDER

Finding the stipulation to be fair to the parties and that it adequately protects the public, 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 DISCIPLINE RECOMMENDED to the Supreme Court.
- The stipulated facts and disposition are APPROVED AS MODIFIED as set forth below, and the DISCIPLINE IS RECOMMENDED to the Supreme Court.

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.) The effective date of this disposition is the effective date of the Supreme Court order herein, normally 30 days after file date. (See rule 953(a), California Rules of Court.)

Date 7/31/03

[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 Los Angeles, on July 31, 2003, I deposited a true copy of the following document(s):

**STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION
AND ORDER APPROVING, filed July 31, 2003**

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

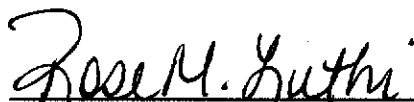
- by first-class mail, with postage thereon fully prepaid, through the United States Postal Service at Los Angeles, California, addressed as follows:

**EDWARD O. LEAR, ESQ.
CENTURY LAW GROUP
5200 W CENTURY BLVD #940
LOS ANGELES CA 90045**

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

CHARLES MURRAY, ESQ., Enforcement, Los Angeles

I hereby certify that the foregoing is true and correct. Executed in Los Angeles, California, on July 31, 2003.



Rose M. Luthi
Case Administrator
State Bar Court