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State Bar Court of California Hearing Department Los Angeles ACTUAL SUSPENSION PUBLIC MATTER		
Counsel For The State Bar Alex Hackert Deputy Trial Counsel 845 S. Figueroa St. Los Angeles, CA 90017 (213) 765-1498 Bar # 267342	Case Number(s): 12-C-10794-WKM	For Court use only <div style="text-align: center;"> FILED JUN 24, 2016 P.B. STATE BAR COURT CLERK'S OFFICE LOS ANGELES </div>
Counsel For Respondent Arthur L. Margolis Margolis & Margolis LLP 2000 Riverside Dr. Los Angeles, CA 90039 (323) 953-8996 Bar # 57703	Submitted to: Assigned Judge STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND ORDER APPROVING	
In the Matter of: Allison Christine Worden Bar # 211104 A Member of the State Bar of California (Respondent)	ACTUAL SUSPENSION <input type="checkbox"/> PREVIOUS STIPULATION REJECTED	

Note: All information required by this form and any additional information which cannot be provided in the space provided, must be set forth in an attachment to this stipulation under specific headings, e.g., "Facts," "Dismissals," "Conclusions of Law," "Supporting Authority," etc.

A. Parties' Acknowledgments:

- (1) Respondent is a member of the State Bar of California, admitted **December 7, 2000**.
- (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 consists of **12** pages, not including the order.
- (4) A statement of acts or omissions acknowledged by Respondent as cause or causes for discipline is included under "Facts."

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- (5) Conclusions of law, drawn from and specifically referring to the facts are also included under "Conclusions of Law".
- (6) The parties must include supporting authority for the recommended level of discipline under the heading "Supporting Authority."
- (7) 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.
- (8) 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 5.130, Rules of Procedure.
 - ☒ Costs are to be paid in equal amounts prior to February 1 for the following membership years: **Two billing cycles immediately following the effective date of the Supreme Court order in this matter.** (Hardship, special circumstances or other good cause per rule 5.132, Rules of Procedure.) If Respondent fails to pay any installment as described above, or as may be modified by the State Bar Court, the remaining balance is due and payable immediately.
 - ☐ Costs are waived in part as set forth in a separate attachment entitled "Partial Waiver of Costs".
 - ☐ Costs are entirely waived.

B. Aggravating Circumstances [Standards for Attorney Sanctions for Professional Misconduct, standards 1.2(h) & 1.5]. Facts supporting aggravating circumstances are required.

- (1) ☐ **Prior record of discipline**
 - (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.
- (2) ☐ **Intentional/Bad Faith/Dishonesty:** Respondent's misconduct was dishonest, intentional, or surrounded by, or followed by bad faith.
- (3) ☐ **Misrepresentation:** Respondent's misconduct was surrounded by, or followed by, misrepresentation.
- (4) ☐ **Concealment:** Respondent's misconduct was surrounded by, or followed by, concealment.
- (5) ☐ **Overreaching:** Respondent's misconduct was surrounded by, or followed by, overreaching.
- (6) ☐ **Uncharged Violations:** Respondent's conduct involves uncharged violations of the Business and Professions Code, or the Rules of Professional Conduct.

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- (7) ☐ **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.
- (8) ☒ **Harm:** Respondent's misconduct harmed significantly a client, the public, or the administration of justice. **See page 9.**
- (9) ☐ **Indifference:** Respondent demonstrated indifference toward rectification of or atonement for the consequences of his or her misconduct.
- (10) ☐ **Candor/Lack of Cooperation:** Respondent displayed a lack of candor and cooperation to victims of his/her misconduct, or to the State Bar during disciplinary investigations or proceedings.
- (11) ☐ **Multiple Acts:** Respondent's current misconduct evidences multiple acts of wrongdoing.
- (12) ☐ **Pattern:** Respondent's current misconduct demonstrates a pattern of misconduct.
- (13) ☐ **Restitution:** Respondent failed to make restitution.
- (14) ☐ **Vulnerable Victim:** The victim(s) of Respondent's misconduct was/were highly vulnerable.
- (15) ☐ **No aggravating circumstances** are involved.

Additional aggravating circumstances:

C. Mitigating Circumstances [see standards 1.2(i) & 1.6]. 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 likely to recur.
- (2) ☐ **No Harm:** Respondent did not harm the client, the public, or the administration of justice.
- (3) ☐ **Candor/Cooperation:** Respondent displayed spontaneous candor and cooperation with the victims of his/her misconduct or to the State Bar during disciplinary investigations and proceedings.
- (4) ☐ **Remorse:** Respondent promptly took objective steps demonstrating spontaneous 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 with a good faith belief that was honestly held and objectively reasonable.
- (8) ☐ **Emotional/Physical Difficulties:** At the time of the stipulated act or acts of professional misconduct Respondent suffered extreme emotional difficulties or physical or mental disabilities which expert testimony would establish was directly responsible for the misconduct. The difficulties or disabilities were not the

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product of any illegal conduct by the member, such as illegal drug or substance abuse, and the difficulties or disabilities no longer pose a risk that Respondent will commit misconduct.

- (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 extraordinarily 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:

No Prior Record of Discipline, see page 9.

Good Character, see page 9.

Civic Service, see page 9.

Pretrial Stipulation, see page 9-10.

D. Discipline:

- (1) ☒ **Stayed Suspension:**
- (a) ☒ Respondent must be suspended from the practice of law for a period of **one year**.
- i. ☐ and until Respondent shows proof satisfactory to the State Bar Court of rehabilitation and fitness to practice and present learning and ability in the general law pursuant to standard 1.2(c)(1) Standards for Attorney Sanctions for Professional Misconduct.
- ii. ☐ and until Respondent pays restitution as set forth in the Financial Conditions form attached to this stipulation.
- iii. ☐ and until Respondent does the following:
- (b) ☒ The above-referenced suspension is stayed.
- (2) ☒ **Probation:**
- Respondent must be placed on probation for a period of **two years**, which will commence upon the effective date of the Supreme Court order in this matter. (See rule 9.18, California Rules of Court)
- (3) ☒ **Actual Suspension:**
- (a) ☒ Respondent must be actually suspended from the practice of law in the State of California for a period of **60 days**.

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- i. ☐ and until Respondent shows proof satisfactory to the State Bar Court of rehabilitation and fitness to practice and present learning and ability in the general law pursuant to standard 1.2(c)(1), Standards for Attorney Sanctions for Professional Misconduct
- ii. ☐ and until Respondent pays restitution as set forth in the Financial Conditions form attached to this stipulation.
- 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 must remain actually suspended until he/she proves to the State Bar Court his/her rehabilitation, fitness to practice, and present learning and ability in the general law, pursuant to standard 1.2(c)(1), Standards for Attorney Sanctions for Professional Misconduct.
- (2) ☒ During the probation period, Respondent must comply with the provisions of the State Bar Act and Rules of Professional Conduct.
- (3) ☒ Within ten (10) days of any change, Respondent must report to the Membership Records Office of the State Bar and to the Office of Probation of the State Bar of California ("Office of Probation"), 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) ☒ Within thirty (30) days from the effective date of discipline, Respondent must contact the Office of Probation and schedule a meeting with Respondent's assigned probation deputy to discuss these terms and conditions of probation. Upon the direction of the Office of Probation, Respondent must meet with the probation deputy either in-person or by telephone. During the period of probation, Respondent must promptly meet with the probation deputy as directed and upon request.
- (5) ☒ Respondent must submit written quarterly reports to the Office of Probation on each January 10, April 10, July 10, and October 10 of the period of probation. Under penalty of perjury, Respondent must 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. Respondent must also state whether there are any proceedings pending against him or her in the State Bar Court and if so, the case number and current status of that proceeding. If the first report would cover less than 30 days, that report must 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.

- (6) ☐ Respondent must be assigned a probation monitor. Respondent must 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 must furnish to the monitor such reports as may be requested, in addition to the quarterly reports required to be submitted to the Office of Probation. Respondent must cooperate fully with the probation monitor.
- (7) ☒ Subject to assertion of applicable privileges, Respondent must answer fully, promptly and truthfully any inquiries of the Office of Probation 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.
- (8) ☒ Within one (1) year of the effective date of the discipline herein, Respondent must provide to the Office of Probation 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. Reason: .
- (9) ☐ Respondent must comply with all conditions of probation imposed in the underlying criminal matter and must so declare under penalty of perjury in conjunction with any quarterly report to be filed with the Office of Probation.
- (10) ☐ The following conditions are attached hereto and incorporated:
- | | |
|-----------------------------------------------------|-----------------------------------------------------------|
| <input type="checkbox"/> Substance Abuse Conditions | <input type="checkbox"/> Law Office Management Conditions |
| <input type="checkbox"/> Medical Conditions | <input type="checkbox"/> Financial Conditions |

F. Other Conditions Negotiated by the Parties:

- (1) ☒ **Multistate Professional Responsibility Examination:** Respondent must provide proof of passage of the Multistate Professional Responsibility Examination ("MPRE"), administered by the National Conference of Bar Examiners, to the Office of Probation 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 9.10(b), California Rules of Court, and rule 5.162(A) & (E), Rules of Procedure.**
- ☐ No MPRE recommended. Reason: .
- (2) ☐ **Rule 9.20, California Rules of Court:** Respondent must comply with the requirements of rule 9.20, California Rules of Court, and perform the acts specified in subdivisions (a) and (c) of that rule within 30 and 40 calendar days, respectively, after the effective date of the Supreme Court's Order in this matter.
- (3) ☐ **Conditional Rule 9.20, California Rules of Court:** If Respondent remains actually suspended for 90 days or more, he/she must comply with the requirements of rule 9.20, California Rules of Court, and perform the acts specified in subdivisions (a) and (c) of that rule within 120 and 130 calendar days, respectively, after the effective date of the Supreme Court's Order in this matter.
- (4) ☐ **Credit for Interim Suspension [conviction referral cases only]:** Respondent will be credited for the period of his/her interim suspension toward the stipulated period of actual suspension. Date of commencement of interim suspension: .
- (5) ☐ **Other Conditions:**

ATTACHMENT TO
STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION

IN THE MATTER OF: ALLISON CHRISTINE WORDEN

CASE NUMBER: 12-C-10794

FACTS AND CONCLUSIONS OF LAW.

Respondent admits that the following facts are true and that the facts and circumstances surrounding the offenses for which she was convicted involved moral turpitude.

Case No. 12-C-10794 (Conviction Proceedings)

PROCEDURAL BACKGROUND IN CONVICTION PROCEEDING:

1. This is a proceeding pursuant to sections 6101 and 6102 of the Business and Professions Code and rule 9.10 of the California Rules of Court.

2. On January 27, 2012, the California Attorney General filed a criminal complaint in the San Diego County Superior Court, case no. M0094579, charging respondent with one count of violation of Penal Code section 182(a)(5) [conspiracy to obstruct justice and the due administration of law], a misdemeanor, two counts of violation of Vehicle Code section 40500(d) [alteration or destruction of a traffic citation], a misdemeanor, and one count of violation of Penal Code section 136.1(a)(2) [attempting to dissuade a witness], a misdemeanor.

3. On December 10, 2012, the court dismissed one of the overt acts as charged in the complaint under the count of violation of Penal Code section 182(a)(5), as alleged to have been committed in furtherance of the conspiracy, on the demurrer of respondent, and thereby the complaint was amended by interlineation.

4. On February 4, 2013, a jury trial began.

5. On February 7, 2013, the court granted the respondent's motion for judgment of acquittal as to the count of violation of Penal Code section 136.1(a)(2), and thereby the complaint was amended by interlineation.

6. On February 8, 2013, the court granted the respondent's motion to dismiss two of the overt acts as charged under the count of violation of Penal Code section 182(a)(5), and thereby the complaint was amended by interlineation.

7. On February 11, 2013, the case was submitted to the jury.

8. On February 13, 2013, the jury found respondent guilty of one count of violation of Penal Code section 182(a)(5) [conspiracy to obstruct justice and the due administration of law], a misdemeanor, as charged in the amended complaint, and two counts of violation of Vehicle Code section 40500(d) [alteration or destruction of a traffic citation], a misdemeanor, as charged in the amended complaint.

9. On March 8, 2013, the court suspended imposition of sentencing and placed respondent on three years of summary probation, including conditions of 1 day in jail (book and release), \$1500 in fines, and 200 hours of volunteer work.

10. On March 26, 2013, the respondent filed a notice of appeal in the San Diego Superior Court. The appeal was later transferred to the Appellate Division of the Orange County Superior Court, case no. CA247020.

11. On August 25, 2015, the Appellate Division of the Orange County Superior Court filed an opinion affirming respondent's conviction.

12. Thereafter, respondent's conviction became final.

13. On February 26, 2016, the Review Department of the State Bar Court issued an order referring the matter to the Hearing Department for a hearing and decision recommending the discipline to be imposed for the offenses for which respondent was convicted. The Review Department determined that the conviction of violation of Penal Code section 182(a)(5) involves moral turpitude as a matter of law, and the conviction of violations of Vehicle Code section 40500(d) may or may not involve moral turpitude.

FACTS:

14. On May 28, 2011, respondent was a passenger in a car driven by her co-worker, as the two were driving in the Pacific Beach area of San Diego. At this time, respondent and the co-worker were Deputy District Attorneys for the San Diego County District Attorney's Office.

15. The co-worker's car was stopped by San Diego Police Department traffic officer after the officer observed respondent not wearing her seat belt. It was the officer's intention to issue a citation to respondent for not wearing her seatbelt and issue a citation to the co-worker for driving with a passenger who was not wearing a seatbelt.

16. During the traffic stop, respondent told the officer that she had only momentarily removed her seatbelt to retrieve her cellphone from the floorboard. Respondent also said that she and the co-worker were Deputy District Attorneys and asked the officer, "can you give us a break?" Regardless, the officer issued seatbelt violation citations to respondent and the co-worker.

17. After the officer left the scene, respondent telephoned a sergeant in the San Diego Police Department's Traffic Division, who respondent primarily knew as a family friend prior to working as a Deputy District Attorney. Respondent asked the sergeant if there was "anything he could do" about the situation. During this conversation, respondent complained that the traffic officer had reached across her to retrieve the co-worker's driver's license and to pass the co-worker her citation, in a manner that she felt was inappropriate.

18. After the traffic officer deposited the original copies of the traffic citations issued to respondent and the co-worker in the bin at the Police Department's Traffic Division designated for processing such citations, and after the officer ended his shift and left the Traffic Division, the sergeant removed those citations from the bin without supervisor approval, in violation of Police Department policy for voiding or dismissing citations.

19. The following day, the sergeant contacted respondent and informed her that he had dismissed the citations, and that he had acted without talking to the traffic officer. Respondent then contacted her co-worker and told her that the sergeant had dismissed the citations, and that the co-worker could destroy of her copy of the citation.

20. On June 2, 2011, the co-worker told respondent that she was to going to pay the fine for her citation. In response, respondent told the co-worker not to pay the fine because the citation had been deleted, and further that the sergeant said to shred it because there was no record of it.

21. After the jury trial, respondent resigned from the San Diego County District Attorney's Office.

CONCLUSIONS OF LAW:

22. The facts and circumstances surrounding the above described violations of Penal Code section 182(a)(5) and Vehicle Code section 40500(d) involve moral turpitude.

AGGRAVATING CIRCUMSTANCES.

Harm to the Administration of Justice (Std. 1.5(j)). Respondent's conduct was damaging to the integrity and credibility of the criminal justice system, and to the legal profession, in that she misused her relationship with the traffic sergeant and her position as a Deputy District Attorney to avoid paying a traffic citation.

MITIGATING CIRCUMSTANCES.

No record of prior discipline. Respondent was admitted to practice in 2000 and at the time of the misconduct had no record of prior discipline over 10 years in practice. (See *In the Matter of Conner* (Review Dept. 2008) 5 Cal. State Bar Ct. Rptr. 93, 106-107 [12 years in practice without discipline].)

Good Character. Respondent provided evidence of 25 individuals who are willing to attest to their belief in respondent's good character, honesty and integrity as an attorney, and specifically in her former role as a prosecutor. These references include 18 attorneys (current and former prosecutors, private practitioners, one of whom is a former police officer, 2 mediators and the former United States Attorney for the Southern District of California), a retired police sergeant, 2 university professors, an airline pilot, a priest, an office administrator, and a retired judge who previously worked as a prosecutor and as a police officer. These references indicated that they were aware of the underlying criminal case based on their contacts with respondent and through local media coverage of the case. Based on these references, respondent is entitled to significant mitigating credit. (*In the Matter of Yee* (2014) 5 Cal. State bar Ct. Rptr. 330, 336.)

Community Service. Respondent volunteered with the Enright Inn of Court since 2001, as a member of the Board of the San Diego Inn of Court since 2009 (where she was elected president in 2015, and previously served as vice-president), through which she has presented evidence workshops and MCLE courses, and with the San Diego County Bar Association, notably with their anti-bullying program. Respondent has continued her work with these organizations after her conviction. Respondent has also volunteered as a speaker for the "Every 15 Minutes" program, which educates teenagers about the dangers of drinking and driving. Respondent's civic service and volunteer work is worth "considerable weight" in mitigation. (*Calvert v. State Bar* (1991) 54 Cal.3d 765, 785.)

Pretrial Stipulation. Respondent voluntarily entered into this stipulation to resolve the prior to trial and should receive mitigative credit for her admission of culpability and consent to the imposition of

discipline, thus saving limited State Bar resources and acknowledging and accepting responsibility for the misconduct. (*Silva-Vidor v. State Bar* (1989) 49 Cal.3d 1071, 1079 [where mitigative credit was given for entering into a stipulation as to facts and culpability].)

AUTHORITIES SUPPORTING DISCIPLINE.

The Standards for Attorney Sanctions for Professional Misconduct “set forth a means for determining the appropriate disciplinary sanction in a particular case and to ensure consistency across cases dealing with similar misconduct and surrounding circumstances.” (Rules Proc. of State Bar, tit. IV, Stds. for Atty. Sanctions for Prof. Misconduct, Std. 1.1.) The Standards help fulfill the primary purposes of discipline, which include: protection of the public, the courts and the legal profession; maintenance of the highest professional standards; and preservation of public confidence in the legal profession. (See Std. 1.1; *In re Morse* (1995) 11 Cal.4th 184, 205.)

Although not binding, the Standards are entitled to “great weight” and should be followed “whenever possible” in determining level of discipline. (*In re Silvertown* (2005) 36 Cal.4th 81, 92, quoting *In re Brown* (1995) 12 Cal.4th 205, 220 and *In re Young* (1989) 49 Cal.3d 257, 267, fn. 11.) Adherence to the Standards in the great majority of cases serves the valuable purpose of eliminating disparity and assuring consistency, that is, the imposition of similar attorney discipline for instances of similar attorney misconduct. (*In re Naney* (1990) 51 Cal.3d 186, 190.) If a recommendation is at the high end or low end of a Standard, an explanation must be given as to how the recommendation was reached. (Std. 1.1.) “Any disciplinary recommendation that deviates from the Standards must include clear reasons for the departure.” (Std. 1.1; *Blair v. State Bar* (1989) 49 Cal.3d 762, 776, fn. 5.)

In determining whether to impose a sanction greater or less than that specified in a given Standard, in addition to the factors set forth in the specific Standard, consideration is to be given to the primary purposes of discipline; the balancing of all aggravating and mitigating circumstances; the type of misconduct at issue; whether the client, public, legal system or profession was harmed; and the member’s willingness and ability to conform to ethical responsibilities in the future. (Stds. 1.7(b) and (c).)

Respondent’s conviction is conclusive evidence of guilt of the elements of the crimes committed. (Bus. & Prof. Code, § 6101(a); *In re Duggan* (1976) 17 Cal.3d 416, 423; *In the Matter of Stewart* (Review Dept. 1994) 3 Cal. State Bar Ct. Rptr. 52, 60.) Respondent’s conviction for violation of Penal Code section 182(a)(5) inherently involves moral turpitude (see *In re Craig* (1938) 12 Cal.2d 93; *In re Joseph* (1989) 49 Cal.3d 430). Therefore, Standard 2.15(c) applies to respondent’s misconduct, under which the presumed sanction is disbarment or actual suspension.

Here, respondent’s attempt to dissuade the traffic officer from issuing her a traffic citation was an improper use of her title as a Deputy District Attorney. Respondent’s request to the police sergeant to look into the citations, whether as a friend or colleague in the criminal justice system, is also an improper use of her social and professional status. (See *In the Matter of Guillory* (Review Dept. 2015) 5 Cal. State Bar Ct. Rptr. ___, 2015 WL 2406159 [as to the attorney’s efforts to avoid arrest for driving under the influence by using his title as a Deputy District Attorney, the court noted, “Guillory’s persistent efforts to exploit his insider status as an attorney in the criminal justice system demonstrate a disturbing lack of respect for the inquiry of the legal system and the profession”].) However, this misconduct is unlikely to reoccur as after the conviction respondent voluntarily resigned from her position with the District Attorney’s Office and the criminal case received significant publicity in the local media. Additionally, although the misconduct caused harm to the administration of justice, no

clients were harmed. Actual suspension under the Standards is still warranted, albeit at the lower end of the spectrum due to respondent's compelling mitigation for her good character and community service, in addition to the mitigation for having no record of discipline in 10 years in practice and for entering into this stipulation. The recommended level of discipline is a one year stayed suspension, two years of probation and a 60-day actual suspension.

COSTS OF DISCIPLINARY PROCEEDINGS.

Respondent acknowledges that the Office of Chief Trial Counsel has informed respondent that as of May 23, 2016, the prosecution costs in this matter are \$2,567. Respondent further acknowledges that should this stipulation be rejected or should relief from the stipulation be granted, the costs in this matter may increase due to the cost of further proceedings.

EXCLUSION FROM MCLE CREDIT

Pursuant to rule 3201, respondent may not receive MCLE credit for completion of State Bar Ethics School, to be ordered as a condition of probation. (Rules Proc. of State Bar, rule 3201.)

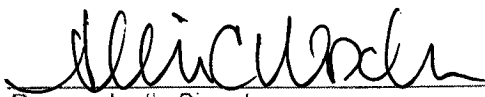
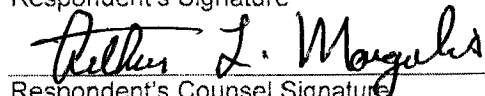

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In the Matter of:
ALLISON CHRISTINE WORDEN

Case number(s):
12-C-10794-WKM

SIGNATURE OF THE PARTIES

By their signatures below, the parties and their counsel, as applicable, signify their agreement with each of the recitations and each of the terms and conditions of this Stipulation Re Facts, Conclusions of Law, and Disposition.

<u>6.1.16</u> Date	 Respondent's Signature	<u>Allison Christine Worden</u> Print Name
<u>6/2/16</u> Date	 Respondent's Counsel Signature	<u>Arthur L. Margolis</u> Print Name
<u>6/2/16</u> Date	 Deputy Trial Counsel's Signature	<u>Alex Hackert</u> Print Name

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In the Matter of:
ALLISON CHRISTINE WORDEN

Case Number(s):
12-C-10794-WKM

ACTUAL SUSPENSION 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.
- ☐ All Hearing dates are vacated.

On page 4 of the Stipulation, under "Additional mitigating circumstances," "Civic Service" is deleted, and in its place is inserted "Community Service".

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 5.58(E) & (F), 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 9.18(a), California Rules of Court.)**

Date

June 24, 2016


W. KEARSE MCGILL
Judge of the State Bar Court

CERTIFICATE OF SERVICE

[Rules Proc. of State Bar; Rule 5.27(B); Code Civ. Proc., § 1013a(4)]

I am a Case Administrator of the State Bar Court of California. 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 June 24, 2016, 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:

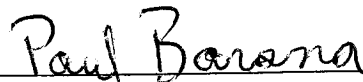
- ☒ by first-class mail, with postage thereon fully prepaid, through the United States Postal Service at Los Angeles, California, addressed as follows:

**ARTHUR LEWIS MARGOLIS
MARGOLIS & MARGOLIS LLP
2000 RIVERSIDE DR
LOS ANGELES, CA 90039**

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

ALEX J. HACKERT, Enforcement, Los Angeles

I hereby certify that the foregoing is true and correct. Executed in Los Angeles, California, on June 24, 2016.



Paul Barona
Case Administrator
State Bar Court