



ORIGINAL

(Do not write above this line.)

<b>State Bar Court of California</b> <b>Hearing Department</b> <b>San Francisco</b> <b>ACTUAL SUSPENSION</b>		
Counsel For The State Bar  <b>Heather E. Abelson</b> <b>Deputy Trial Counsel</b> <b>180 Howard Street</b> <b>San Francisco, CA 94105</b> <b>(415) 538-2357</b>  Bar # 243691	Case Number(s): <b>12-C-16648-PEM</b>	For Court use only  <div style="text-align: center;"> <b>PUBLIC MATTER</b>   <b>FILED</b>    <b>APR 13 2015</b>   <b>STATE BAR COURT CLERK'S OFFICE</b>  <b>SAN FRANCISCO</b> </div>
Counsel For Respondent  <b>Jonathan I. Arons</b> <b>Law Office of Jonathan I. Arons</b> <b>100 Bush St., Suite 918</b> <b>San Francisco, CA 94104</b> <b>(415) 957-1818</b>  Bar # 111257	Submitted to: <b>Assigned Judge</b>  STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND ORDER APPROVING  <b>ACTUAL SUSPENSION</b>  <input type="checkbox"/> PREVIOUS STIPULATION REJECTED	
In the Matter of: <b>LAWRENCE TANG MA</b>  Bar # 265868  A Member of the State Bar of California (Respondent)		

**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 1, 2009**.
- (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."

(Effective January 1, 2014)



(Do not write above this line.)

- (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 (2) 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(f) & 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)  **Dishonesty:** Respondent's misconduct was intentional, surrounded by, or followed by bad faith, dishonesty, concealment, overreaching or other violations of the State Bar Act or Rules of Professional Conduct. **See "Facts Supporting Aggravating Circumstances" in the attachment hereto at p. 9.**
- (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.

(Do not write above this line.)

- (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)  **Restitution:** Respondent failed to make restitution.
- (9)  **No aggravating circumstances** are involved.

**Additional aggravating circumstances:**

**C. Mitigating Circumstances [see standards 1.2(g) & 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 deemed serious.
- (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 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 with a good faith belief that was honestly held and 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 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.

(Do not write above this line.)

- (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:**

**Pretrial Stipulation - See "Facts Supporting Mitigating Circumstances" in the attachment hereto at p. 9.**

**D. Discipline:**

(1)  **Stayed Suspension:**

- (a)  Respondent must be suspended from the practice of law for a period of **three 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 1.2(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 **three 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 **three 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 1.2(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 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.

(Do not write above this line.)

- (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:
  - Substance Abuse Conditions
  - Medical Conditions
  - Law Office Management Conditions
  - 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**

(Do not write above this line.)

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: **July 12, 2013.**
- (5)  **Other Conditions:**

**ATTACHMENT TO**  
**STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION**

IN THE MATTER OF:                      LAWRENCE TANG MA

CASE NUMBER:                            12-C-16648-PEM

**FACTS AND CONCLUSIONS OF LAW.**

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

Case No. 12-C-16648-PEM (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 September 11, 2012, the Alameda County District Attorney filed a criminal complaint in Alameda County Superior Court, case no. 444636B, charging respondent with one count of violation of Penal Code section 550(a)(1) [Insurance Fraud], a felony, and one count of violation of Penal Code section 550(b)(1) [Insurance Fraud], a felony.

3. On May 2, 2013, the court entered respondent's plea of no contest to a count of violation of Penal Code section 550(b)(1) [Insurance Fraud], a misdemeanor, and based thereon, the court found respondent guilty of that count. Pursuant to a plea agreement, the court dismissed the remaining count in the furtherance of justice.

4. On May 2, 2013, the court suspended imposition of sentence and placed respondent on conditional sentence for a period of three years. The court ordered that respondent, among other things, serve six days in jail, to be served through the Weekend Work Program, 35 hours of community service, which was completed at the time of sentencing, and payment of a total restitution fine of \$480.

5. On January 30, 2015, 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 offense for which respondent was convicted which the Review Department determined involved moral turpitude as a matter of law.

FACTS:

6. In December 2011, the Department of Insurance ("DOI") initiated Operation Acupuncture, an undercover operation targeting an acupuncturist who was suspected of engaging in insurance fraud by billing insurance companies for services that he did not provide to his patients.

7. Two undercover agents, operating under the aliases Jason Chan ("Chan") and Nancy Loy ("Loy"), were assigned to Operation Acupuncture. The cover story was that Loy was Chan's sister-in-

law, and that that on January 29, 2012, while Chan was driving and Loy was asleep in the passenger seat, they were involved in a car accident on Interstate 880. In preparation for the undercover operation, the DOI obtained an auto insurance policy with California Casualty Indemnity Exchange ("California Casualty") for an undercover vehicle under the insured name Jason Chan, and obtained a traffic collision report for the January 29, 2012 accident from the California Highway Patrol.

8. Between February 1, 2012 and April 26, 2012, Chan and Loy separately visited the suspect acupuncture clinic on multiple occasions to receive treatment for injuries purportedly arising from the January 29, 2012 accident. During the course of these visits, Chan and Loy received massage and cupping, but did not receive acupuncture. Chan and Loy electronically recorded all of their visits.

9. During Loy's visits to the acupuncture clinic, Loy repeatedly told the acupuncturist that she was not injured, and was just interested in obtaining settlement money from the insurance company.

10. On February 14, 2012, during a treatment session at the acupuncture clinic, Chan was provided business cards for three attorneys.

11. On March 1, 2012, during a treatment session at the acupuncture clinic, Chan told the acupuncturist that he had called one of the law offices from the business cards ("Law Office"), but his call had not been returned.

12. On March 6, 2012, during a treatment session at the acupuncture clinic, Chan told the acupuncturist that the Law Office had called him back, but they were not sure whether they wanted to take his case, and that they wanted to know how many treatments Chan would receive from the acupuncturist. The acupuncturist estimated that Chan would need approximately 20 treatments.

13. On March 8, 2012, during a treatment session at the acupuncture clinic, the acupuncturist told Loy that Chan had been in touch with the Law Office, and that the acupuncturist would have that lawyer call her.

14. On March 27, 2012, Chan met with the Law Office's office manager at the acupuncture clinic. Chan signed a Claimant's Designation of Attorney form, an Authorization to Disclose Health Information form, an Authorization form to request hospital records, police reports, and insurance information, and a retainer agreement.

15. On April 3, 2012, during a treatment session at the acupuncture clinic, the acupuncturist gave Chan a packet of documents from the Law Office, which included a Claimant's Designation of Attorney form, an Authorization to Disclose Health Information form, an Authorization form to request hospital records, police reports, and insurance information, and a retainer agreement, for Loy to fill out.

16. On April 25, 2012, Loy visited the Law Office, where she met with respondent who helped her fill out her insurance claim forms. During the meeting, Loy told respondent that she had been asleep during the car accident, that she was not injured but the acupuncturist told her to lie and say that she was, and that she just wanted to boost her settlement amount. Respondent told her to write on the insurance form what the acupuncturist told her to say, that she should not go for treatment with the acupuncturist for too long because it would look bad to the insurance company, and that she should write on the claim form that she woke up just prior to the accident, and therefore felt the impact of the accident. Loy told respondent that she was "just looking for a pocket," and respondent responded "yeah, yeah, exactly."



17. On May 29, 2012, Loy spoke with respondent. Respondent told her that he was waiting for documents from the acupuncturist in order to submit the demand letter to the insurance company.

18. On June 4, 2012, respondent sent copies of the retainer agreements to Loy and Chan, both of which were executed by respondent.

19. On July 6, 2012, respondent sent a settlement demand letter to California Casualty. The demand letter falsely stated that Loy began experiencing pain symptoms the day after the accident. The demand letter included a copy of the acupuncturist's medical reports for Chan and Loy, which falsely claimed that Chan and Loy had received acupuncture treatment.

20. On August 29, 2012, the DOI executed a search warrant at the acupuncture clinic.

21. On August 30, 2012, several telephonic communications occurred between Chan, Loy and Law Office's office manager, in which the office manager tried to figure out how the police had gotten involved with the acupuncture clinic. In one conversation between the office manager and Loy, the office manager told Loy that the law firm could not represent her because she was not really injured, and Loy responded that this was not what respondent had told her.

22. On September 6, 2012, DOI Detectives interviewed respondent. Respondent stated that he was an independent contractor with the Law Offices. Respondent stated that he got his cases through the Law Offices' office manager. Respondent falsely stated that Loy told him that she was injured. Respondent also falsely claimed that he learned Loy was sleeping at the time of the collision after reading the police report.

#### CONCLUSIONS OF LAW:

23. As determined by the Review Department in its order referring this matter for hearing, the above-described violation involved moral turpitude.

#### FACTS SUPPORTING AGGRAVATING CIRCUMSTANCES.

**Dishonesty (Std. 1.5(d)):** Respondent instructed Loy to make false statements on her insurance claim form. Respondent falsely stated in his settlement demand letter to California Casualty that Loy had experienced pain immediately following the accident. Respondent also falsely stated to the DOI detectives that Loy had told him that she was injured in the accident. Respondent's repeated acts of dishonesty constitute a significant aggravating factor pursuant to Standard 1.5(d).

#### FACTS SUPPORTING MITIGATING CIRCUMSTANCES.

**Pretrial Stipulation:** Respondent is entitled to mitigation for entering into a full stipulation with the Office of Chief Trial Counsel prior to trial, thereby saving State Bar Court time and resources. (*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. All further references to Standards are to this source.) 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 Silverton* (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).)

In this matter, respondent was convicted of violating Penal Code section 550(b)(1) [insurance fraud], a misdemeanor. On June 2, 2013, the Review Department issued an order placing respondent on interim suspension given the fact that respondent’s conviction constituted a crime of moral turpitude. Because respondent’s misdemeanor conviction involved moral turpitude (*see e.g., In the Matter of Oheb* (2006) 4 Cal. State Bar Ct. Rptr. 920; *Sampson v. State Bar* (1974) 12 Cal. 3d 70), Standard 2.11(c) applies. Standard 2.11(c) provides that “disbarment or actual suspension is appropriate for final conviction of a misdemeanor involving moral turpitude.” The facts and circumstances surrounding respondent’s conviction, namely respondent’s repeated intentional acts of dishonesty, which serve as a substantial aggravating factor, warrant a three-year actual suspension. Disbarment is not warranted because respondent’s misconduct is entitled to mitigation for entering into a pre-trial stipulation, and because respondent’s willingness to accept responsibility for his misconduct by entering into this stipulation, demonstrates a likelihood that respondent will not engage in similar misconduct in the future.

*In the Matter of Oheb* (2006) 4 Cal. State Bar Ct. Rptr. 920, supports a three-year actual suspension in this matter. In *Oheb*, the Review Department recommended disbarment arising out of attorney Oheb’s two felony convictions for violating Penal Code Section 549 [accepting referrals of clients who intended to make false insurance claims]. (*Id.* at 924.) The Review Department found that Oheb’s misconduct involved moral turpitude, even though the Review Department found that Oheb’s conviction arose out of acts of gross negligence, not intentional misconduct. (*Id.* at 935-37.) The Review Department further found that Oheb’s misconduct was aggravated by multiple acts of wrongdoing, personal gain, substantial harm, and failure to make complete restitution. (*Id.* at 938.) The Review Department found that Oheb’s misconduct was slightly mitigated by good character evidence and cooperation with the State Bar. (*Id.* at 938-39.) Oheb’s misconduct commenced less than five years after his admission to practice law. (*Id.* at 928.) The Review Department recommended disbarment, noting that “the usual discipline for an attorney’s conviction of a crime which involves serious acts of moral turpitude is disbarment.” (*Id.* at 942.)

Here, respondent's misconduct warrants a slightly lower level of discipline than recommended in *Oheb*. Attorney Oheb was convicted of two felony counts, while respondent was convicted of a single misdemeanor count. Attorney Oheb's misconduct was also subject to more aggravating circumstances. These distinguishing facts warrant a level of discipline that is short of disbarment for respondent.

Balancing all of the appropriate factors, a three-year actual suspension is consistent with Standard 2.11 and applicable caselaw, and is appropriate taking into consideration the facts and circumstances of this case.

#### **COSTS OF DISCIPLINARY PROCEEDINGS.**

Respondent acknowledges that the Office of the Chief Trial Counsel has informed Respondent that as of March 16, 2015, the prosecution costs in this matter are \$3,419. 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**

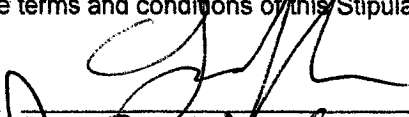
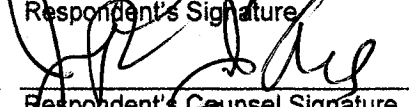
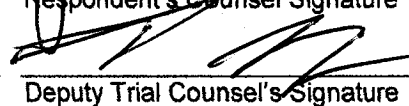
Pursuant to rule 3201, Respondent may not receive MCLE credit for completion of State Bar Ethics School. (Rules Proc. of State Bar, rule 3201.)

(Do not write above this line.)

In the Matter of: LAWRENCE TANG MA	Case number(s): 12-C-16648-PEM
---------------------------------------	-----------------------------------

**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.

3/16/2015		Lawrence Tang Ma
Date	Respondent's Signature	Print Name
March 25, 2015		Jonathan I. Arons
Date	Respondent's Counsel Signature	Print Name
3/27/15		Heather E. Abelson
Date	Deputy Trial Counsel's Signature	Print Name

(Do not write above this line.)

In the Matter of: LAWRENCE TANG MA	Case Number(s): 12-C-16648-PEM
---------------------------------------	-----------------------------------

### 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.

1. On page 2 of the stipulation, in paragraph B(2), the "X" in the box and the inserted sentence which begins "See 'Facts' " are DELETED to remove dishonesty as an aggravating circumstance.
2. On page 4 of the stipulation, in paragraph D(1)(a)(i), the "X" in the box is DELETED to remove the standard 1.2(c)(1) condition.
3. On page 4 of the stipulation, in paragraph (E)(1) the "X" in the box is DELETED to remove the conditional standard 1.2(c)(1) condition.

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 April 13, 2015 Pat Mc Elroy  
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 San Francisco, on April 13, 2015, 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 San Francisco, California, addressed as follows:

JONATHAN IRWIN ARONS  
LAW OFC JONATHAN I ARONS  
100 BUSH ST STE 918  
SAN FRANCISCO, CA 94104

by certified mail, No. , with return receipt requested, through the United States Postal Service at , California, addressed as follows:

by overnight mail at , California, addressed as follows:


by fax transmission, at fax number . No error was reported by the fax machine that I used.

By personal service by leaving the documents in a sealed envelope or package clearly labeled to identify the attorney being served with a receptionist or a person having charge of the attorney's office, addressed as follows:

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

Heather E. Abelson, Enforcement, San Francisco

I hereby certify that the foregoing is true and correct. Executed in San Francisco, California, on April 13, 2015.

  
George Hue  
Case Administrator  
State Bar Court