

PUBLIC MATTER

FILED

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STATE BAR COURT

HEARING DEPARTMENT - SAN FRANCISCO

14 In the Matter of:) Case No. 12-O-13196
 15)
 16 JEFFREY JOHN PARISH) NOTICE OF DISCIPLINARY CHARGES
 17 No. 47046,)
 18 A Member of the State Bar)

NOTICE - FAILURE TO RESPOND!

IF YOU FAIL TO FILE A WRITTEN ANSWER TO THIS NOTICE WITHIN 20 DAYS AFTER SERVICE, OR IF YOU FAIL TO APPEAR AT THE STATE BAR COURT TRIAL:

- 21 (1) YOUR DEFAULT WILL BE ENTERED;
- 22 (2) YOUR STATUS WILL BE CHANGED TO INACTIVE AND YOU WILL NOT BE PERMITTED TO PRACTICE LAW;
- 23 (3) YOU WILL NOT BE PERMITTED TO PARTICIPATE FURTHER IN THESE PROCEEDINGS UNLESS YOU MAKE A TIMELY MOTION AND THE DEFAULT IS SET ASIDE, AND;
- 24 (4) YOU SHALL BE SUBJECT TO ADDITIONAL DISCIPLINE. SPECIFICALLY, IF YOU FAIL TO TIMELY MOVE TO SET ASIDE OR VACATE YOUR DEFAULT, THIS COURT WILL ENTER AN ORDER RECOMMENDING YOUR DISBARMENT WITHOUT FURTHER HEARING OR PROCEEDING. SEE RULE 5.80 ET SEQ., RULES OF PROCEDURE OF THE STATE BAR OF CALIFORNIA.

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1 The State Bar of California alleges:

2 JURISDICTION

3 1. Jeffrey John Parish ("Respondent") was admitted to the practice of law in the State of
4 California on June 26, 1970, was a member at all times pertinent to these charges, and is
5 currently a member of the State Bar of California.

6 COUNT ONE

7 Case No. 12-O-13196

8 Business and Professions Code, section 6106

[Moral Turpitude]

9 2. Respondent wilfully violated Business and Professions Code, section 6106, by
10 committing an act involving moral turpitude, dishonesty or corruption, as follows:

11 3. As a member of the State Bar, Respondent was required to complete 25 hours of
12 minimum continuing legal education ("MCLE") during the period commencing on or about
13 February 1, 2008, and ending on or about January 31, 2011 (the "compliance period").

14 4. On or about December 2, 2010, Respondent reported to the State Bar that he was in
15 full compliance with the MCLE requirements, and, in particular, that he had completed his
16 MCLE during the compliance period.

17 5. When Respondent reported to the State Bar that he was in full compliance with the
18 MCLE requirements, Respondent knew or was grossly negligent in not knowing that he had not
19 completed the MCLE during the compliance period as required.

20 6. By reporting to the State Bar that he was in full compliance with the MCLE
21 requirements when he knew or was grossly negligent in not knowing that he was not in
22 compliance with the MCLE requirements, Respondent intentionally or by gross negligence
23 committed an act involving moral turpitude, dishonesty and corruption.

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COUNT TWO
Case No. 12-O-13196
Business and Professions Code, section 6068(i)
[Failure to Cooperate in State Bar Investigation]

7. Respondent wilfully violated Business and Professions Code, section 6068(i), by failing to cooperate and participate in a disciplinary investigation pending against Respondent, as follows:

8. The allegations contained in Count One are hereby incorporated by this reference.

9. On or about April 27, 2012, the State Bar opened an investigation in this matter.

10. On or about May 3, 2012, and on or about May 7, 2012, a State Bar investigator sent letters to Respondent regarding case no. 12-O-13196. The letters requested that Respondent respond in writing to specified allegations of misconduct being investigated by the State Bar in this matter, and provide specified information and documentation. Respondent received the letters, but failed to respond to the allegations, provide any of the specified information and documentation requested, or otherwise cooperate in the State Bar investigation.

11. On or about May 10, 2012, a State Bar investigator sent another letter to Respondent regarding case no. 12-O-13196. The letter informed Respondent of his obligation to cooperate under Business and Professions Code, section 6068(i). Respondent received the letter, but failed to respond to the allegations, provide any of the specified information and documentation requested, or otherwise cooperate in the State Bar investigation.

12. On or about May 9, 2012, on or about May 11, 2012, and on or about May 17, 2012 Respondent faxed non-responsive letters to the State Bar in which Respondent did not respond to the allegations, provide any of the specified information and documentation requested, or otherwise cooperate in the State Bar investigation.

13. On or about May 24, 2012, the State Bar investigator sent another letter to Respondent regarding case no. 12-O-13196. The letter informed Respondent of his obligation to cooperate under Business and Professions Code, section 6068(i). The letter requested that

1 Respondent provide the response and documents requested in the State Bar's letters of May 3,
2 2012, and May 7, 2012. Respondent received the letter, but failed to respond to it.

3 14. At no time did Respondent provide a response to the allegations of misconduct in this
4 matter or otherwise cooperate with the State Bar investigation.

5 15. By failing to provide a written response to the allegations regarding Respondent's
6 conduct in this matter or otherwise failing to cooperate in the State Bar investigation,
7 Respondent failed to cooperate and participate in a disciplinary investigation pending against
8 Respondent.

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10 **NOTICE - INACTIVE ENROLLMENT!**

11 **YOU ARE HEREBY FURTHER NOTIFIED THAT IF THE STATE BAR
12 COURT FINDS, PURSUANT TO BUSINESS AND PROFESSIONS CODE
13 SECTION 6007(c), THAT YOUR CONDUCT POSES A SUBSTANTIAL
14 THREAT OF HARM TO THE INTERESTS OF YOUR CLIENTS OR TO
15 THE PUBLIC, YOU MAY BE INVOLUNTARILY ENROLLED AS AN
16 INACTIVE MEMBER OF THE STATE BAR. YOUR INACTIVE
17 ENROLLMENT WOULD BE IN ADDITION TO ANY DISCIPLINE
18 RECOMMENDED BY THE COURT.**

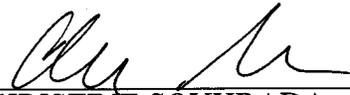
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20 **NOTICE - COST ASSESSMENT!**

21 **IN THE EVENT THESE PROCEDURES RESULT IN PUBLIC
22 DISCIPLINE, YOU MAY BE SUBJECT TO THE PAYMENT OF COSTS
23 INCURRED BY THE STATE BAR IN THE INVESTIGATION, HEARING
24 AND REVIEW OF THIS MATTER PURSUANT TO BUSINESS AND
25 PROFESSIONS CODE SECTION 6086.10.**

26 Respectfully submitted,

27 THE STATE BAR OF CALIFORNIA
28 OFFICE OF THE CHIEF TRIAL COUNSEL

29 DATED: October 1, 2012

By: 

CHRISTINE SOUHRADA
Deputy Trial Counsel

DECLARATION OF SERVICE

by
U.S. FIRST-CLASS MAIL and U.S. CERTIFIED MAIL

CASE NUMBER(s): 12-O-13196

I, the undersigned, am over the age of eighteen (18) years and not a party to the within action, whose business address and place of employment is the State Bar of California, 180 Howard Street, San Francisco, California 94105, declare that:

- on the date shown below, I caused to be served a true copy of the within document described as follows:

NOTICE OF DISCIPLINARY CHARGES



By U.S. First-Class Mail: (CCP §§ 1013 and 1013(a))

- in accordance with the practice of the State Bar of California for collection and processing of mail, I deposited or placed for collection and mailing in the City and County of San Francisco.



By U.S. Certified Mail: (CCP §§ 1013 and 1013(a))



By Overnight Delivery: (CCP §§ 1013(c) and 1013(d))

- I am readily familiar with the State Bar of California's practice for collection and processing of correspondence for overnight delivery by the United Parcel Service ('UPS').



By Fax Transmission: (CCP §§ 1013(e) and 1013(f))

Based on agreement of the parties to accept service by fax transmission, I faxed the documents to the persons at the fax numbers listed herein below. No error was reported by the fax machine that I used. The original record of the fax transmission is retained on file and available upon request.



By Electronic Service: (CCP § 1010.6)

Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the person(s) at the electronic addresses listed herein below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.



(for U.S. First-Class Mail) in a sealed envelope placed for collection and mailing at San Francisco, addressed to: (see below)



(for Certified Mail) in a sealed envelope placed for collection and mailing as certified mail, return receipt requested,

Article No.: 7196 9008 9111 6623 1262 at San Francisco, addressed to: (see below)



(for Overnight Delivery) together with a copy of this declaration, in an envelope, or package designated by UPS,

Tracking No.: addressed to: (see below)

Table with 4 columns: Person Served, Business-Residential Address, Fax Number, Courtesy Copy to. Row 1: JEFFREY JOHN PARISH, LAW OFFICE OF JEFFREY J. PARISH 1929 PARK MEADOW DRIVE, ALAMO, CA 94507, Electronic Address.



via inter-office mail regularly processed and maintained by the State Bar of California addressed to:

N/A

I am readily familiar with the State Bar of California's practice for collection and processing of correspondence for mailing with the United States Postal Service, and overnight delivery by the United Parcel Service ('UPS'). In the ordinary course of the State Bar of California's practice, correspondence collected and processed by the State Bar of California would be deposited with the United States Postal Service that same day, and for overnight delivery, deposited with delivery fees paid or provided for, with UPS that same day.

I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date on the envelope or package is more than one day after date of deposit for mailing contained in the affidavit.

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

DATED: October 1, 2012

SIGNED: [Signature] ANNA READUNGO Declarant