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**State Bar Court of California
Hearing Department
San Francisco
DISBARMENT**

Counsel For The State Bar Robin B. Brune Senior Trial Counsel 180 Howard Street San Francisco, CA 94105 (415) 538-2218 Bar # 149481	Case Number(s): 12-O-16850-PEM; 13-O-11620	For Court use only ORIGINAL FILED <i>LP</i> DEC 20 2013 STATE BAR COURT CLERK'S OFFICE SAN FRANCISCO
In Pro Per Respondent Hal Erwin Wright 216 F Street Davis, CA 95616 Bar # 157814	Submitted to: Assigned Judge STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND ORDER APPROVING; ORDER OF INVOLUNTARY INACTIVE ENROLLMENT DISBARMENT <input type="checkbox"/> PREVIOUS STIPULATION REJECTED	
In the Matter of: HAL ERWIN WRIGHT Bar # 157814 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 April 7, 1992.
- (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 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, 2011)

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EXHIBIT

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Disbarment

- (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):
- ☒ Costs to be awarded to the State Bar.
- ☐ Costs are waived in part as set forth in a separate attachment entitled "Partial Waiver of Costs".
- ☐ Costs are entirely waived.
- (9) ORDER OF INACTIVE ENROLLMENT:
The parties are aware that if this stipulation is approved, the judge will issue an order of inactive enrollment under Business and Professions Code section 6007, subdivision (c)(4), and Rules of Procedure of the State Bar, rule 5.111(D)(1).

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**
- (a) ☒ State Bar Court case # of prior case 01-O-02009 (See attachment at page 9)
- (b) ☒ Date prior discipline effective December 4, 2003
- (c) ☒ Rules of Professional Conduct/ State Bar Act violations: Rules of Professional Conduct, rule 3-110(A) failure to perform; rule 3-700(D)(2) failure to return unearned fee; and rule 4-100(B)(3) failure to render accounting.
- (d) ☒ Degree of prior discipline private reproof
- (e) ☒ If respondent has two or more incidents of prior discipline, use space provided below:
- See attachment at page 9
- (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. See attachment at page 9

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- (5) ☒ **Indifference:** Respondent demonstrated indifference toward rectification of or atonement for the consequences of his or her misconduct. See attachment at page 9
- (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. See attachment at page 9
- (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 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 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.

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- (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:

Stipulation - See attachment, page 10

D. Discipline: **Disbarment.**

E. Additional Requirements:

- (1) **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.
- (2) ☒ **Restitution:** Respondent must make restitution to see below in the amount of \$ see below plus 10 percent interest per year from see below. If the Client Security Fund has reimbursed the clients for all or any portion of the principal amount, respondent must pay restitution to CSF of the amount paid plus applicable interest and costs in accordance with Business and Professions Code section 6140.5. Respondent must pay the above restitution and furnish satisfactory proof of payment to the State Bar's Office of Probation in Los Angeles no later than 365 days from the effective date of the Supreme Court order in this case.
- (3) ☒ **Other:** Additional information on restitution
 1. Restitution to Steve Isaacson in the amount of \$40,000, with interest at the rate of ten percent per annum accruing from April 5, 2011.
 2. Restitution to the Davis Muscial Theater Company ("DMTC") in the amount of \$15,500, with interest at the rate of ten percent per annum accruing from November 19, 2012.
 3. Restitution to Steve and Kathy Ramirez in the sum of \$2,500, with interest at the rate of ten percent per annum accruing from April 1, 2010.

ATTACHMENT TO
STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION

IN THE MATTER OF: HAL ERWIN WRIGHT

CASE NUMBERS: 12-O-16850; 13-O-11620

FACTS AND CONCLUSIONS OF LAW.

Respondent admits that the following facts are true and that he is culpable of violations of the specified statutes and/or Rules of Professional Conduct.

Case No. 13-O-11620 (Complainant: Steve Isaacson)

FACTS:

1. Steve Isaacson ("Isaacson") hired Respondent in September 2010, to represent him in a personal injury matter in connection with a fall Isaacson sustained at the Big Idea Theater in Sacramento, California on June 5, 2010. The parties did not execute a written fee agreement.
2. Respondent settled Isaacson's claim against the Big Idea Theater with Northland Insurance Company on April 1, 2011, for the sum of \$40,000 without Isaacson's knowledge or consent. The value of Isaacson's suit far exceeded \$40,000.
3. On April 1, 2011, Respondent forged Isaacson's signature and Isaacson's wife's signature on the General Release, Defense, Indemnity and Hold Harmless Agreement for the personal injury matter ("release") and forwarded it to Northland Insurance Company. Based upon receipt of the forged release, Northland Insurance Company issued two checks in settlement of the claim. The first check, check no. 9360, dated April 5, 2011, was issued to Steve and Jan Isaacson and their Attorney, Hal E. Wright, in the sum of \$5,000. The second check, check no. 93601, also dated April 5, 2011, was issued to Steve and Jan Isaacson and their Attorney, Hal E. Wright, in the sum of \$35,000.
4. Upon receipt, Respondent forged the signatures of Isaacson and Jan Isaacson on the backs of each of the checks and deposited the funds into Respondent's client trust account. Thereafter, Respondent diverted the funds to another checking account and spent the monies on matters unrelated to Isaacson. Respondent misappropriated the Isaacson settlement funds for his own use and benefit.
5. From the beginning of Respondent's representation in September 2010, until January 2013, Respondent made false statements and representations to Isaacson indicating that Respondent was pursuing the personal injury case, had filed suit, and that litigation was proceeding forward.
6. In fact, Respondent did not file a personal injury lawsuit against Big Idea Theater on behalf of Isaacson. Respondent sent Isaacson numerous emails in which he misled Isaacson to believe that Isaacson's case was moving forward, as follows:
 - October 9, 2012; Respondent sent Isaacson an email stating, "Hi Steve, Still working on getting you some jingle."; In truth and in fact, Respondent was not working on the case.

- January 18, 2012; Respondent sent Isaacson an email stating, "It sickens me that you are still in pain and I'm trying my best with these "suits" but thinking outside the box/bun is not their forte. The case is actually in better shape now than it was 6 months ago. Everybody's in."; In truth and in fact, Respondent was not working on the case.
- January 12, 2013; Respondent sent Isaacson an email stating, "I spent a couple of hours on the phone with Cincinnati. I told them that we absolutely had to have some more in lost wages (easiest to quantify and, therefore, less to fight over) because you were hurting financially. Threw Insurance Code 760h at them (bad faith, hard to prove but it's there) and said if we have to go that route we will. I am supposed to hear first thing Monday and told them this time we want a wire."; In truth and in fact, Respondent never had a telephone conference with the defendant.

7. At the time the Respondent made the statements, he knew them to be false. Respondent was no longer pursuing Isaacson's personal injury matter but had in fact settled Isaacson's case for \$40,000, and misappropriated the funds.

8. In December 2011, Respondent also told Isaacson that he intended to file an additional suit on behalf of Isaacson for medical malpractice, in order to address Isaacson's concerns about the medical treatment Isaacson received after Isaacson fell at the Big Idea Theater. On August 1, 2012, Isaacson wrote a check in the amount of \$390 to the Sacramento Court for the purpose of paying for the filing fees for the medical malpractice case. Respondent scratched out the payee, "Sac Superior Court", and wrote in "Hal Wright POA" and cashed the check. Respondent misappropriated the Court filing fees for his own use and benefit. Respondent never filed suit for medical malpractice on behalf of Isaacson.

9. In May 2012, Isaacson hired Respondent for a second matter. Isaacson, in his capacity as board member and Vice President of the Davis Musical Theater company ("DMTC"), hired Respondent to obtain the proceeds of a bequeath to the DMTC that a theater patron, Evalynn "Bridget" F. Davis, ("Bridget's Trust") had left to DMTC in her will. The parties did not execute a written fee agreement. In May 2012, Isaacson gave the letter regarding the inheritance and related documents to Respondent.

10. On October 1, 2012, Respondent executed a document entitled Beneficiary Waiver of Account and Consent to Final Distribution in connection with the Bridget's Trust matter. On November 19, 2012, Respondent received a check, check no. 1113, for \$15,500 from Janice Townsend, Trustee, on behalf of Bridget's Trust, issued to the DMTC representing Evalynn "Bridget" F. Davis's bequeath to DMTC. Respondent endorsed the check from Bridget's Trust and deposited the funds into his client trust account.

11. Respondent paid \$3,000 of the \$15,500 funds from Bridget's Trust to Isaacson, falsely telling Isaacson that the funds were a partial payment from the insurance company on the personal injury matter, for a lost wages claim. Respondent then misappropriated the remaining \$12,500 for his own use and benefit. DMTC never received the \$15,500 in funds from Bridget's Trust. Respondent did not advise Isaacson when he received the \$15,500 from Bridget's Trust

CONCLUSIONS OF LAW:

12. By misappropriating \$40,000 of Isaacson's settlement funds for his own use and benefit, Respondent committed an act involving moral turpitude, dishonesty or corruption, in willful violation of

Business and Professions Code, section 6106.

13. By settling Isaacson's suit without Isaacson's knowledge or consent, and by representing to Isaacson that he was still pursuing the lawsuit, when in fact Respondent had never filed suit, had settled the matter for \$40,000 without his client's knowledge or consent, and had misappropriated the settlement funds, Respondent committed acts involving moral turpitude, dishonesty and corruption, in willful violation of Business and Professions Code, section 6106.

14. By submitting a forged release to Northland Insurance company, and by forging Isaacson and Jan Isaacson's signatures on the settlement checks, Respondent committed acts involving moral turpitude, dishonesty or corruption, in willful violation of Business and Professions Code, section 6106.

15. By failing to pursue the personal injury lawsuit on behalf of Isaacson, Respondent intentionally, recklessly, or repeatedly failed to perform legal services with competence, in willful violation of Rules of Professional Conduct, rule 3-110(A).

16. By misappropriating Isaacson's \$390 check for the court filing fees for his own use ad benefit, Respondent committed acts involving moral turpitude, dishonesty or corruption, in willful violation of Business and Professions Code, section 6106.

17. By misrepresenting to Isaacson that he was going to file suit on behalf of Isaacson for medical malpractice, as a pretext to obtaining the check for \$390 as filing fees, Respondent committed an act involving moral turpitude, dishonesty or corruption in willful violation of Business and Professions Code, section 6106.

18. By misappropriating \$12,500 of the Bridget Trust funds for his own use and benefit, and by misrepresenting to Isaacson that the \$3,000 payment to him was from the personal injury matter, and not from Bridget's Trust, Respondent committed an act involving moral turpitude, dishonesty or corruption, in willful violation of Business and Professions Code, section 6106.

19. By failing to advise Isaacson, as the board member and Vice President of DMTC, when Respondent received the \$15,500 from Bridget's Trust, Respondent failed to notify a client promptly of the receipt of the client's funds, in willful violation of Rules of Professional Conduct, rule 4-100(B)(1).

Case No. 12-O-16850 (Complainants: Steven and Kathleen Ramirez)

20. On March 29, 2010, Steven and Kathleen Ramirez ("the Ramirezes") hired Respondent to obtain a trademark for their company, Ramirez Tow, as well as to obtain two LLCs (limited liability corporations) and to seek to vacate a judgment against them. The Ramirezes paid Respondent \$3,000 as an advanced fee. Thereafter, Respondent performed no legal services on their behalf.

21. On October 5, 2011, Respondent sent an email to Kathleen Ramirez falsely stating that he had downloaded and filled out forms to get a copyright/servicemark registered in California and "mailed them, along with the required fee, about three weeks ago." In fact, Respondent did not submit a request for copyright or servicemark on behalf of the Ramirezes to any California registration process.

22. On February 22, 2012, Kathleen Ramirez sent an email to the Respondent requesting an accounting and a full refund. Respondent received the email, but failed to provide Kathleen Ramirez with an accounting or a refund.

23. The Ramirezes obtained new counsel to assist them. On March 28, 2012, the Ramirezes' new counsel sent an email to the Respondent and requested a full refund of \$3,000 in 30 days. Respondent agreed to provide a full refund and the parties agreed to a payment plan. Respondent made one payment of \$500 on June 8, 2012, but has made no further payments.

CONCLUSIONS OF LAW:

24. By failing to provide legal services of any value on the Ramirez's behalf, Respondent intentionally, recklessly, or repeatedly failed to perform legal services with competence in willful violation of Rules of Professional Conduct, rule 3-110(A).

25. By misrepresenting to the Ramirezes that he had taken action on their behalf when in fact he had not done so, Respondent committed an act involving moral turpitude, dishonesty or corruption in willful violation of Business and Professions Code, section 6106.

26. By failing to render appropriate accounts to Kathleen Ramirez of the advanced fees, Respondent failed to render appropriate accounts to a client regarding all funds coming into Respondent's possession in willful violation of Rules of Professional Conduct, rule 4-100(B)(3).

27. By failing to refund \$2,500 in unearned fees to the Ramirezes, Respondent failed to refund promptly any part of a fee paid in advance that has not been earned, in willful violation of Rules of Professional Conduct, rule 3-700(D)(2).

AGGRAVATING CIRCUMSTANCES.

Prior Record of Discipline (Std. 1.2(b)(i)): Respondent received a private reproof in December 2003 (case no. 01-O-02009) for violating Rules of Professional Conduct, rule 3-110(A) failure to perform; rule 3-700(D)(2) failure to refund an unearned fee; and rule 4-100(B)(3) failure to maintain disputed funds in trust. On March 28, 2013, the State Bar Court issued a decision in case no. 10-O-10808, et al. recommending an 18-month actual suspension for Respondent's misconduct in two client matters, including violations of Business and Professions Code, section 6106, (moral turpitude) for misrepresenting to the clients the status of their legal matters; and Business and Professions Code, section 6106, moral turpitude, for falsely reporting his MCLE compliance. Additional violations included Rules of Professional Conduct, rule 3-110(A) (two counts) failure to perform; rule 3-700(D)(2) (two counts) failure to refund an unearned fee; and Business and Professions Code, section 6068(m) failure to communicate. This case is currently on appeal.

Harm (Std. 1.2(b)(iv)): Respondent significantly harmed his clients. Isaacson was deprived of \$40,000 of his settlement funds. Isaacson was deprived of his day in court and a full and accurate assessment of the worth of his lawsuit due to Respondent's settlement of the suit prematurely for an amount far less than its value. Respondent also injured the DMTC, a non-profit community theater which has now been deprived of the benefit of the Bridget's Trust payment of \$15,000. Respondent also harmed the Ramirezes who have been deprived of \$2,500 for over a year.

Indifference (Std. 1.2(b)(v)): Respondent has not returned any of the funds he misappropriated.

Multiple Acts of Misconduct (Std. 1.2(b)(ii)): Respondent committed 12 acts of misconduct in three client matters, demonstrating multiple acts of misconduct.

MITIGATING CIRCUMSTANCES

Pretrial Stipulation: Respondent admitted culpability to the misconduct, obviating a need for a trial in this matter. ((See *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 provide a “process of fixing discipline” pursuant to a set of written principles to “better discharge the purposes of attorney discipline as announced by the Supreme Court.” (Rules Proc. of State Bar, tit. IV, Stds. for Atty. Sanctions for Prof. Misconduct, Introduction (all further references to standards are to this source).) The primary purposes of disciplinary proceedings and of the sanctions imposed are “the protection of the public, the courts and the legal profession; the maintenance of high professional standards by attorneys and the preservation of public confidence in the legal profession.” (*In re Morse* (1995) 11 Cal. 4th 184, 205; std. 1.3.)

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.) Any discipline recommendation different from that set forth in the applicable standards should clearly explain the reasons for the deviation. (*Blair v. State Bar* (1989) 49 Cal.3d 762, 776, fn. 5.)

The most severe sanction applicable to Respondent’s misconduct is found in Standard 2.2(a) based on Respondent’s misappropriation of client funds. Standard 2.2(a) provides that a misappropriation of entrusted funds shall result in disbarment, only if the amount of funds or property misappropriated is insignificantly small or if the most compelling mitigating circumstances clearly predominate, shall disbarment not be imposed. In those latter cases, the discipline shall not be less than a one-year actual suspension, irrespective of mitigating circumstances. Here, Respondent misappropriated significant sums of money, \$40,000 in one case and \$12,500 in the second case. He concealed his misconduct by failing to advise Isaacson that he had even received the funds in both the DMTC theater and personal injury matter. In the personal injury matter, he also gave Isaacson false information about the progress of the case when in fact he never filed suit. Here, there only mitigating circumstance is Respondent’s agreement to stipulate to this matter, and the misappropriated sums are large. Disbarment is warranted pursuant to Standard 2.2.

Standard 1.7(b) also applies because Respondent has two prior records of discipline. Standard 1.7(b), provides that if a member is found culpable of professional misconduct in any proceeding in which discipline may be imposed and the member has a record of two prior impositions of discipline as defined by Standard 12(f), the degree of discipline in the current proceeding shall be disbarment unless the most compelling mitigating circumstances clearly predominate. Here, Respondent has two prior disciplinary matters. Respondent received a private reproof in December 2003 (case no. 01-O-02009) for violating Rules of Professional Conduct, rule 3-110(A) failure to perform; rule 3-700(D)(2) failure to refund an unearned fee; and rule 4-100(B)(3) failure to maintain disputed funds in trust. On March 28, 2013, the State Bar Court issued a decision in case no. 10-O-10808, et al. recommending an 18-month actual suspension for Respondent’s misconduct in two client matters, including violations of Business and

Professions Code, section 6106, (moral turpitude) for misrepresenting to the clients the status of their legal matters; and Business and Professions Code, section 6106, moral turpitude, for falsely reporting his MCLE compliance. Additional violations included Rules of Professional Conduct, rule 3-110(A) (two counts) failure to perform; rule 3-700(D)(2) (two counts) failure to refund an unearned fee; and Business and Professions Code, section 6068(m) failure to communicate. Although this second case is currently on appeal, it constitutes a prior for purposes of the Standards (Standard 1.2(f); Rules of Procedure of the State Bar, rule 216). Pursuant to these Standards, this is Respondent's third disciplinary offense and he should be disbarred.

Additionally, Respondent's misconduct is aggravated by his repeated dishonesty in all three client matters. Case law supports that dishonesty to clients and misappropriation warrant disbarment. In *Kennedy v. State Bar* (1989) 48 Cal. 3d. 610, the Supreme Court disbarred an attorney with no prior disciplinary record for misappropriating \$8,000 of a client's settlement funds. The Court deemed \$8,000 to be a significant amount. The attorney also forged the client's name on a medical payment check from the insurance company and deposited the check without notifying the client. In aggravation, the Court noted that the attorney had not reimbursed any funds. In mitigation, the Court stated that the attorney's partnership was dissolving at the time of the misconduct and that there were no additional complaints against him. Respondent's misconduct is similar to that in *Kennedy*. Both Respondent and the attorney in *Kennedy* misappropriated client funds, forged checks, and made misrepresentations to the clients. Respondent's misconduct is more egregious since Respondent has a prior record of discipline and his mitigation is limited to his agreement to enter into this stipulation. Respondent significantly harmed his clients and he failed to return any of the misappropriated funds. Therefore, disbarment in this matter is appropriate and is the only discipline consistent with the purposes of discipline set forth in standard 1.3.

COSTS OF DISCIPLINARY PROCEEDINGS.

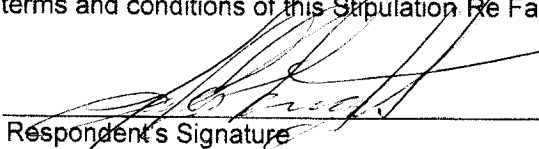
Respondent acknowledges that the Office of the Chief Trial Counsel has informed Respondent that as of July 22, 2013, the prosecution costs in this matter are \$4,404.05. Respondent further acknowledges that should this stipulation be rejected or should relief from the stipulation be granted, the costs in this matter may increase due to the cost of further proceedings.

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In the Matter of: HAL ERWIN WRIGHT	Case number(s): 12-O-16850; 13-O-11620
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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>11/20/2013</u> Date	 Respondent's Signature	<u>HAL ERWIN WRIGHT</u> Print Name
<u>11/20/2013</u> Date	<u>Robin B. Brune</u> Respondent's Counsel Signature	<u>ROBIN B. BRUNE</u> Print Name
<u>11/20/2013</u> Date	<u>Robin B. Brune</u> Deputy Trial Counsel's Signature	<u>ROBIN B. BRUNE</u> Print Name

(Do not write above this line.)

In the Matter of:
HAL ERWIN WRIGHT

Case Number(s):
12-O-16850; 13-O-11620

DISBARMENT 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.

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.)**

Respondent is ordered transferred to involuntary inactive status pursuant to Business and Professions Code section 6007, subdivision (c)(4). Respondent's inactive enrollment will be effective three (3) calendar days after this order is served by mail and will terminate upon the effective date of the Supreme Court's order imposing discipline herein, or as provided for by rule 5.111(D)(2) of the Rules of Procedure of the State Bar of California, or as otherwise ordered by the Supreme Court pursuant to its plenary jurisdiction.

Date

Dec 20, 2013

Judge of the State Bar Court

Patricia McElroy

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 December 20, 2013, 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:

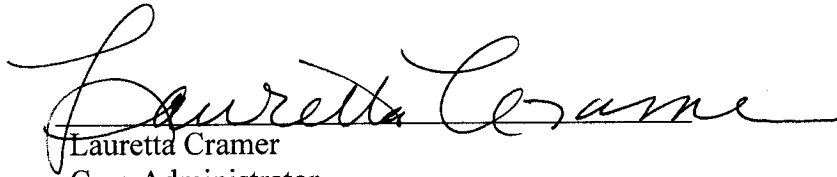
- ☒ by first-class mail, with postage thereon fully prepaid, through the United States Postal Service at San Francisco, California, addressed as follows:

HAL E. WRIGHT
216 F ST
DAVIS, CA 95616

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

Robin B. Brune, Enforcement, San Francisco

I hereby certify that the foregoing is true and correct. Executed in San Francisco, California, on December 20, 2013.


Laurretta Cramer
Case Administrator
State Bar Court