

PUBLIC MATTER

1 STATE BAR OF CALIFORNIA
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FILED

JUN 27 2014

STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

STATE BAR COURT

HEARING DEPARTMENT - LOS ANGELES

12 In the Matter of:)	Case Nos. 13-O-13271
)	13-O-15925
13 GREGORY LYLE JACKSON,)	13-O-16341
14 No. 212265,)	
)	NOTICE OF DISCIPLINARY CHARGES
15 A Member of the State Bar)	

NOTICE - FAILURE TO RESPOND!

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

- 19 (1) YOUR DEFAULT WILL BE ENTERED;
- 20 (2) YOUR STATUS WILL BE CHANGED TO INACTIVE AND YOU
WILL NOT BE PERMITTED TO PRACTICE LAW;
- 21 (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;
- 22 (4) YOU SHALL BE SUBJECT TO ADDITIONAL DISCIPLINE.
SPECIFICALLY, IF YOU FAIL TO TIMELY MOVE TO SET
23 ASIDE OR VACATE YOUR DEFAULT, THIS COURT WILL
24 ENTER AN ORDER RECOMMENDING YOUR DISBARMENT
WITHOUT FURTHER HEARING OR PROCEEDING. SEE RULE
25 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. Respondent Gregory Lyle Jackson was admitted to the practice of law in the State
4 of California on January 11, 2001, was a member at all times pertinent to these charges, and
5 is currently a member of the State Bar of California.

6 COUNT ONE

7 Case No. 13-O-13271

8 Rules of Professional Conduct, rule 3-110(A)
9 [Failure to Perform with Competence]

10 2. On or about July 12, 2012, Violeta Gloyd employed Respondent to perform legal
11 services, namely to represent her in her dissolution of marriage filed in San Diego Superior
12 Court, case no. D537878, in which Respondent intentionally, recklessly, or repeatedly failed
13 to perform with competence, in wilful violation of Rules of Professional Conduct, rule
14 3-110(A), by the following:

- 15 a. Failing to appear at the September 27, 2012 status conference in Gloyd's
16 dissolution matter;
- 17 b. Failing to appear or to respond in any way to the order to show cause re
18 imposition of sanctions held on October 24, 2012 in Gloyd's dissolution
19 matter for which Respondent had notice;
- 20 c. Failing to appear or to respond in any way to the order to show cause re
21 imposition of sanctions held on November 28, 2012 in Gloyd's dissolution
22 matter for which Respondent had notice; and
- 23 d. Failing to take any other action in Gloyd's dissolution matter between filing
24 the petition on August 10, 2012, and the termination of Respondent's
25 employment in May 2013.
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COUNT TWO

Case No. 13-O-13271

Business and Professions Code section 6068(m)
[Failure to Respond to Reasonable Client Inquiries]

3. Respondent failed to respond promptly to multiple telephonic reasonable status inquiries made by Respondent's client, Violetta Gloyd, between September 2012 until May 2013 that Respondent received in a matter in which Respondent had agreed to provide legal services, in wilful violation of Business and Professions Code section 6068(m).

COUNT THREE

Case No. 13-O-13271

Business and Professions Code section 6068(m)
[Failure to Inform Client of Significant Developments]

4. Respondent failed to keep Respondent's client, Violeta Gloyd, reasonably informed of significant developments in San Diego Superior Court, case no. D537878, in which Respondent had agreed to provide legal services, in wilful violation of Business and Professions Code section 6068(m), by failing to inform the client of the following:

- a. Of the September 27, 2012 status conference and that Respondent would not be attending the September 27, 2012 status conference;
- b. Of the October 24, 2012 order to show cause hearing and that Respondent would not be attending the October 24, 2012 order to show cause hearing; and
- c. Of the November 28, 2012 order to show cause hearing and that Respondent would not be attending the November 28, 2012 order to show cause hearing.

COUNT FOUR

Case No. 13-O-13271

Rules of Professional Conduct, rule 4-100(B)(3)
[Failure to Render Accounts of Client Funds]

5. On or about July 28, 2012, Respondent received from Respondent's client, Violeta Gloyd, the sum of \$3,500 as advanced fees for legal services to be performed.

1 Respondent thereafter failed to render an appropriate accounting to the client regarding those
2 funds following the client's termination of Respondent in May 2013, and request for a refund
3 of the unearned portion of the advanced attorney fees in wilful violation of Rules of
4 Professional Conduct, rule 4-100(B)(3).

5 COUNT FIVE

6 Case No. 13-O-15925

7 Rules of Professional Conduct, rule 3-110(A)

8 [Failure to Perform with Competence]

9 6. On or about February 26, 2013, Jessica Morgan employed Respondent to perform
10 legal services, namely to represent her husband in filing a writ of habeas corpus, in which
11 Respondent intentionally, recklessly, or repeatedly failed to perform with competence, in
12 wilful violation of Rules of Professional Conduct, rule 3-110(A), by the following:

- 13 a. Failing to prepare and file the writ of habeas corpus on behalf of Jessica
14 Williams' husband, William Morgan; and
15 b. Failing to take any action on behalf of William Morgan on the post-conviction
16 proceedings for which he was employed.

17 COUNT SIX

18 Case No. 13-O-15925

19 Business and Professions Code section 6068(m)

20 [Failure to Respond to Reasonable Client Inquiries]

21 7. Respondent failed to respond promptly to multiple telephonic reasonable status
22 inquiries made by Respondent's client, William Morgan, and Respondent's client's wife,
23 Jessica Morgan, who was authorized to communicate with Respondent concerning Morgan's
24 legal matter, between July 8, 2013 and August 12, 2013 that Respondent received in a matter
25 in which Respondent had agreed to provide legal services, in wilful violation of Business and
26 Professions Code section 6068(m).

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COUNT SEVEN

Case No. 13-O-15925
Rules of Professional Conduct, rule 4-100(B)(3)
[Failure to Render Accounts of Client Funds]

8. In the time period from February 26, 2013 through July 8, 2013, Respondent received from Respondent's client, William Morgan, the sum of \$3,500 as advanced fees for legal services to be performed. Respondent thereafter failed to render an appropriate accounting to the client regarding those funds following the client's termination of Respondent on August 12, 2013, and request for a refund of the unearned portion of the advanced attorney fees in wilful violation of Rules of Professional Conduct, rule 4-100(B)(3).

COUNT EIGHT

Case No. 13-O-15925
Rules of Professional Conduct, rule 3-700(D)(2)
[Failure to Refund Unearned Fees]

9. In the time period from February 26, 2013 through July 8, 2013, Respondent received advanced fees of \$3,500 from a client, William Morgan, for purposes of filing a writ of habeas corpus on Morgan's behalf. Respondent performed no services of value on behalf of the client and therefore earned none of the advanced fees paid. Respondent failed to refund promptly, upon Respondent's termination of employment on or about August 12, 2013 any part of the \$3,500 fee, in wilful violation of Rules of Professional Conduct, rule 3-700(D)(2).

COUNT NINE

Case No. 13-O-16341
Rules of Professional Conduct, rule 3-110(A)
[Failure to Perform with Competence]

10. In April 2013, Lena and Kenneth Pettis employed Respondent to perform legal services, namely to represent their son Kashavon Pettis in a criminal matter in San Diego Superior Court, in which Respondent intentionally, recklessly, or repeatedly failed to perform

1 with competence, in wilful violation of Rules of Professional Conduct, rule 3-110(A), by the
2 following:

- 3 a. Failing to appear at the bail review hearing set for May 16, 2013 in Pettis's
4 criminal matter for which Respondent had notice;
- 5 b. Failing to appear or to respond in any way to the order to show cause re
6 imposition of sanctions held on July 23, 2013 in Pettis's criminal matter for
7 which Respondent had notice; and
- 8 c. Failing to take any other action in Pettis's criminal matter after visiting Pettis
9 in jail as his attorney on July 1, 2013 and appearing at the May 2, 2013
10 hearing in Pettis's criminal matter.

11 COUNT TEN

12 Case No. 13-O-16341

13 Business and Professions Code section 6068(m)
14 [Failure to Respond to Reasonable Client Inquiries]

15 11. Respondent failed to respond promptly to multiple telephonic reasonable status
16 inquiries made by Respondent's client, Kashavon Pettis, and his client's parents who were
17 authorized to communicate with Respondent on Pettis's behalf, Lena and Kenneth Pettis,
18 between May 16, 2013 and July 23, 2013 that Respondent received in a matter in which
19 Respondent had agreed to provide legal services, in wilful violation of Business and
20 Professions Code section 6068(m).

21 COUNT ELEVEN

22 Case No. 13-O-16341

23 Business and Professions Code section 6068(m)
24 [Failure to Inform Client of Significant Developments]

25 12. Respondent failed to keep Respondent's client, Kashavon Pettis, and his client's
26 parents who were authorized to communicate with Respondent on Pettis's behalf, Lena and
27 Kenneth Pettis, reasonably informed of significant developments in a matter in which
28 Respondent had agreed to provide legal services, in wilful violation of Business and
Professions Code section 6068(m), by failing to inform the client of the following:

- 1 a. That Respondent would not be attending the May 16, 2013 bail review
2 hearing for which Respondent had notice; and
3 b. Of the July 23, 2013 order to show cause hearing and that Respondent did not
4 intend to appear at the July 23, 2013 order to show cause hearing for which
5 Respondent had notice.

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7 **NOTICE - INACTIVE ENROLLMENT!**

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

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18 **NOTICE - COST ASSESSMENT!**

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

24 Respectfully submitted,

25 THE STATE BAR OF CALIFORNIA
26 OFFICE OF THE CHIEF TRIAL COUNSEL

27 DATED: June 26, 2014

28 By: 

Erin McKeown-Joyce
SENIOR TRIAL COUNSEL

DECLARATION OF SERVICE

by

U.S. FIRST-CLASS MAIL / U.S. CERTIFIED MAIL / OVERNIGHT DELIVERY / FACSIMILE-ELECTRONIC TRANSMISSION

CASE NUMBER(s): 13-O-13271, 13-O-15925, 13-O-16341

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, 1149 South Hill Street, Los Angeles, California 90015, 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 Los Angeles.

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 Los Angeles, addressed to: (see below)

(for Certified Mail) in a sealed envelope placed for collection and mailing as certified mail, return receipt requested, Article No.: 71969008911110069415 at Los Angeles, 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 via certified mail, Business-Residential Address, Fax Number, and Courtesy Copy via First Class Mail. Row 1: Gregory L. Jackson, Law Office of Gregory L. Jackson, 1400 Chester Ave Ste K, Bakersfield, CA 93301, Electronic Address, Richard Monahan, 2616 S K St, Bakersfield, CA 93304.

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 Los Angeles, California, on the date shown below.

DATED: June 27, 2014

SIGNED: [Signature] JULI FINNILA Declarant