

1 STATE BAR OF CALIFORNIA
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FILED
OCT 10 2014
 STATE BAR COURT
 CLERK'S OFFICE
 LOS ANGELES

STATE BAR COURT
 HEARING DEPARTMENT - LOS ANGELES

In the Matter of:) Case No. 13-O-14521; 14-O-00682
 PALAK CHOPRA,) NOTICE OF DISCIPLINARY CHARGES
 No. 225048,)
 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:

- (1) YOUR DEFAULT WILL BE ENTERED;**
- (2) YOUR STATUS WILL BE CHANGED TO INACTIVE AND YOU WILL NOT BE PERMITTED TO PRACTICE LAW;**
- (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;**
- (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. Palak Chopra ("respondent") was admitted to the practice of law in the State of
4 California on June 3, 2003, was a member at all times pertinent to these charges, and is currently
5 a member of the State Bar of California.

6 COUNT ONE

7 Case No. 13-O-14521
8 Rules of Professional Conduct, rule 3-110(A)
9 [Failure to Perform with Competence]

10 2. In or about 2011, Dosa Lite Indian Veg. Grill employed Respondent to perform legal
11 services, namely to defend them in the lawsuit filed by Plaintiffs in *Alicia Torrez vs. Dosa Lite*
12 *Indian Veg. Grill Et al.*, Los Angeles Superior Court Case No. BC453026, in which Respondent
13 intentionally, recklessly, or repeatedly failed to perform with competence, in willful violation of
14 Rules of Professional Conduct, rule 3-110(A), by the following:

- 15 a. Respondent failed to respond or appear for the October 28, 2011 case
16 management conference.
- 17 b. Respondent failed to appear for the December 19, 2011 Order to Show Cause
18 hearing.
- 19 c. Respondent failed to appear for the April 12, 2012 case management conference.
- 20 d. Respondent failed to appear for the May 3, 2012 Order to show cause hearing.
- 21 e. Respondent failed to appear for the June 15, 2012 Case management conference.
- 22 f. Respondent failed to appear for the July 12, 2012 Order to show cause hearing
23 and the court issued a default judgment against defendants, Respondent's client.
- 24 g. Respondent failed to appear for the March 13, 2013 order to show cause hearing
25 and the court issued monetary sanctions against Respondent in the amount of
26 \$3,925.00.
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COUNT TWO
Case No. 13-O-14521
Business and Professions Code, section 6103
[Failure to Obey a Court Order]

3. Respondent disobeyed or violated an order of the court requiring Respondent to do or forbear an act connected with or in the course of Respondent's profession which Respondent ought in good faith to do or forbear by failing to comply with the March 13, 2013 Order regarding payment of sanctions totaling in the amount of \$3,925 to the Plaintiff's counsel, the Superior Court, and Client Security Fund, in *Alicia Torrez vs. Dosa Lite Indian Veg. Grill Et al.*, Los Angeles Superior Court Case No. BC453026 in willful violation of Business and Professions Code, section 6103.

COUNT THREE
Case No. 13-O-14521
Business and Professions Code, section 6068(o)(3)
[Failure to Report Judicial Sanctions]

4. Respondent failed to report to the agency charged with attorney discipline, in writing, within 30 days of the time Respondent had knowledge of the imposition of any judicial sanctions against Respondent by failing to report to the State Bar the \$3,925.00 in sanctions the court imposed on Respondent on or about March 13, 2013 in connection with *Alicia Torrez vs. Dosa Lite Indian Veg. Grill Et al.*, Los Angeles Superior Court Case No. BC453026, in willful violation of Business and Professions Code section, 6068(o)(3).

COUNT FOUR
Case No. 13-O-14521
Business and Professions Code, section 6068(i)
[Failure to Cooperate in State Bar Investigation]

5. Respondent failed to cooperate and participate in a disciplinary investigation pending against Respondent by failing to provide a substantive response to the State Bar's letter of January 30, 2014, which Respondent received, that requested Respondent's response to the allegations of misconduct being investigated in case no. 13-O-14521 in willful violation of Business and Professions Code, section 6068(i).

COUNT FIVE
 Case No. 14-O-682
 Rules of Professional Conduct, rule 4-100(A)
 [Commingling Personal Funds in Client Trust Account]

6. In or about October 2013-March 2014, Respondent did not promptly remove funds which Respondent had earned as fees from Respondent's client trust account at Wells Fargo Bank, account no. XXXXXXXX-4392, and issued the following checks from those funds in Respondent's CTA for the payment of personal expenses, in willful violation of Rules of Professional Conduct, rule 4-100(A):

Date	Payee	Notes/Memo	Amount
1. 10/4/13	Mike Mendonis	Rent for Sept 2013	\$850.00
2. 10/10/13	AmEx ACH Debit		\$250.00
3. 10/15/13	AT&T ACH Debit		\$260.44
4. 10/16/13	So Cal Edison ACH Debit		\$250.00
5. 10/16/13	So Cal Edison ACH Debit		\$100.00
6. 10/18/13	Serrano Elementary	Anya Chopra for field trip	\$30.00
7. 10/21/13	Vicky Schmuhl	Armen Chopra, fee for Serrano Robotic team	\$30.00
8. 10/25/13	AmEx ACH Debit		\$674.00
9. 10/25/13	AmEx ACH Debit		\$250.00
10. 10/28/13	Mike Mendonis	Rent for Oct 2013	\$850.00
11. 10/28/13	Jane Kosakowski	Anya Chopra activities	\$20.00
12. 11/18/13	AmEx ACH Debit		\$800.00
13. 11/18/13	AmEx ACH Debit		\$100.00
14. 11/19/13	AT&T ACH Debit		\$257.33
15. 11/25/13	AmEx ACH Debit		\$300.00
16. 11/29/13	So Cal Edison ACH Debit		\$118.87
17. 12/06/13	AT&T ACH Debit		\$265.47
18. 12/06/13	AmEx ACH Debit		\$262.12
19. 12/06/13	Mike Mendonis	Rent for Nov 2013	\$850.00
20. 12/16/13	AmEx ACH Debit		\$1000.00
21. 12/16/13	AmEx ACH Debit		\$500.00
22. 12/16/13	Serrano PFO	Serrano School Parent Faculty Organization	\$75.00
23. 12/30/13	AmEx ACH Debit		\$300.00

1	24. 12/30/13	Mike Mendonis	Rent for Dec 2013	\$850.00
2	25. 1/06/14	AmEx ACH Debit		\$300.00
3	26. 1/9/14	AT&T ACH Debit		\$250.00
4	27. 1/23/14	AmEx ACH Debit		\$300.00
5	28. 1/23/14	AmEx ACH Debit		\$100.00
6	29. 2/3/14	So Cal Edison ACH Debit		\$161.89
7	30. 2/3/14	So Cal Gas ACH Debit		\$126.00
8	31. 2/4/14	AmEx ACH Debit		\$500.00
9	32. 2/5/14	State Bar of California 2014 State Bar Member Fee		\$420.00
10	33. 2/10/14	AmEx ACH Debit		\$300.00
11	34. 2/10/14	AT&T ACH Debit		\$261.28
12	35. 2/13/14	Mike Mendonis	Rent for Jan 2014	\$850.00
13	36. 3/13/14	Mike Mendonis	Rent for Feb 2014 - March 15, 2014	\$1,300.00
14	37. 3/17/14	AT&T ACH Debit		\$260.97

COUNT SIX

Case No. 14-O-682

Business and Professions Code, section 6106
[Moral Turpitude-Issuance of NSF checks]

15 7. From in or about February 2014 to in or about December 2014, Respondent
16 repeatedly issued the following checks drawn upon Respondent's client trust account at Wells
17 Fargo Bank account no. XXXXXXXX-4392 when Respondent knew or was grossly negligent in
18 not knowing that there was insufficient funds in the CTA to pay them, and thereby committed an
19 act involving moral turpitude, dishonesty or corruption in willful violation of Business and
20 Professions Code, section 6106:

21	[CHECK NO.]	[CHECK DATE]	[CHECK AMT.]	[RETURNED/PAID]
22	a. 0000	12/16/2014	\$1,000 .00	Paid
23	b. 0000	12/16/2014	\$500.00	Paid
24	c. 1179	12/16/2014	\$75.00	Paid
25	d. 1237	2/13/2014	\$850.00	Paid

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COUNT SEVEN

Case No. 14-O-682
Business and Professions Code, section 6068(i)
[Failure to Cooperate in State Bar Investigation]

8. Respondent failed to cooperate and participate in a disciplinary investigation pending against Respondent by failing to provide a substantive response to the State Bar's letters of March 20, 2014, and April 2, 2014, which Respondent received, that requested Respondent's response to the allegations of misconduct being investigated in case no. 14-O-682, in willful violation of Business and Professions Code, section 6068(i).

NOTICE - INACTIVE ENROLLMENT!

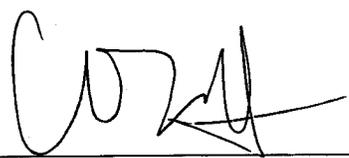
YOU ARE HEREBY FURTHER NOTIFIED THAT IF THE STATE BAR COURT FINDS, PURSUANT TO BUSINESS AND PROFESSIONS CODE SECTION 6007(c), THAT YOUR CONDUCT POSES A SUBSTANTIAL THREAT OF HARM TO THE INTERESTS OF YOUR CLIENTS OR TO THE PUBLIC, YOU MAY BE INVOLUNTARILY ENROLLED AS AN INACTIVE MEMBER OF THE STATE BAR.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

NOTICE - COST ASSESSMENT!

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

Respectfully submitted,

THE STATE BAR OF CALIFORNIA
OFFICE OF THE CHIEF TRIAL COUNSEL



DATED: October 10, 2014

By: _____
Sue Hong
Deputy Trial Counsel

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DECLARATION OF SERVICE BY CERTIFIED MAIL

CASE NUMBER: 13-O-14521; 14-O-00682

I, the undersigned, over the age of eighteen (18) years, whose business address and place of employment is the State Bar of California, 845 South Figueroa Street, Los Angeles, California 90017, declare that I am not a party to the within action; that 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; that 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; that I am aware that on motion of 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; and that 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, on the date shown below, a true copy of the within:

NOTICE OF DISCIPLINARY CHARGES

in a sealed envelope placed for collection and mailing as certified mail, return receipt requested, **Article No.: 7196 9008 9111 6410 7217**, at Los Angeles, on the date shown below, addressed to:

**Palak Chopra
P.O. Box 2528
Orange, CA 92859**

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: October 10, 2014

Signed: 
Carmen Corona
Declarant