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State Bar Court of California Hearing Department Los Angeles ACTUAL SUSPENSION		
Counsel For The State Bar Hugh G. Radigan Deputy Trial Counsel 845 South Figueroa Street Los Angeles, California 90017-2515 213-765-1206 Bar # 94251	Case Number(s): 13-O-16476 LMA	For Court use only <div style="text-align: center; font-size: 1.2em; font-weight: bold;">PUBLIC MATTER</div> <div style="text-align: center; font-size: 1.5em; font-weight: bold;">FILED</div> <div style="text-align: center; font-size: 1.2em; font-weight: bold;">NOV 21 2014</div> <div style="text-align: center; font-size: 0.8em; margin-top: 10px;">STATE BAR COURT CLERK'S OFFICE SAN FRANCISCO</div>
In Pro Per Respondent Patrick Thomas Santos P.O. Box 6159 North Hollywood, California 91603 310-424-3050 Bar # 265982	Submitted to: Settlement Judge STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND ORDER APPROVING ACTUAL SUSPENSION <input type="checkbox"/> PREVIOUS STIPULATION REJECTED	
In the Matter of: PATRICK THOMAS SANTOS Bar # 265982 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."
- (5) Conclusions of law, drawn from and specifically referring to the facts are also included under "Conclusions of Law".

(Effective January 1, 2014)

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- (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: **Costs to be paid in equal amounts prior to February 1 for the two billing cycles following the effective date of the Supreme Court discipline order.** (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.
- (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.**
- (5) **Indifference:** Respondent demonstrated indifference toward rectification of or atonement for the consequences of his or her misconduct.
- (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.

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- (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) **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.
- (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:

See attachment at page 10.

D. Discipline:

(1) **Stayed Suspension:**

(a) Respondent must be suspended from the practice of law for a period of **two (2) 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 **two (2) 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 **thirty (30) days**.

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.

(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.

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- (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:

- | | |
|---|---|
| <input type="checkbox"/> Substance Abuse Conditions | <input type="checkbox"/> Law Office Management Conditions |
| <input type="checkbox"/> Medical Conditions | <input type="checkbox"/> 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 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: .

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- (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:

- (5) **Other Conditions:**

9. On March 15, 2013, Mercedes' counsel filed the motion to strike the unverified answer and enter Velarde's default. Respondent failed to oppose the motion to strike.
10. On March 18, 2013, Velarde paid Respondent an additional \$1,000 to replenish the requested attorney's fees.
11. On March 25, 2013, Respondent failed to appear at the scheduled Case Management Conference resulting in its continuance to June 17, 2013.
12. On April 18, 2013, Respondent e-mailed Velarde to remind him of outstanding discovery obligations and the deadline for a prospective cross-complaint. Respondent said nothing regarding the need to file an amended verified answer or that Mercedes was moving forward with their motion to strike.
13. On April 24, 2013, Respondent e-mailed Mercedes counsel to request an extension with respect to outstanding discovery, discovery which Velarde was unaware had been propounded.
14. On May 6, 2013, Respondent e-mailed Velarde expressing that he was not entitled to a refund and that he needed to find replacement counsel.
15. On May 8, 2013, Respondent e-mailed Velarde that his deposition was scheduled for the next morning and that Respondent would not be appearing. Within this e-mail was the first memorialized reference to Respondent's pending motion to be relieved as counsel.
16. Respondent failed to appear at both the motion to strike the answer and enter default and the motion to withdraw which were set for hearing on May 10, 2013. The court granted the motion to strike Velarde's answer and denied Respondent's motion to withdraw as counsel of record. Respondent failed to advise Velarde of the outcome of the two motions. The court order additionally gave Respondent until May 27, 2013, to file and serve a verified answer.
17. On May 13, 2013, Mercedes' counsel served Respondent with notice of ruling as to both motions.
18. It was not until May 24, 2013 that Respondent e-mailed Velarde to advise him of the need for filing a verified answer no later than May 27, 2013.
19. On June 5, 2013, Respondent e-mailed Velarde to encourage him to sign a substitution and for the first time communicated the prospect of a default judgment being entered against him.
20. Mercedes' counsel filed a request to enter default on May 31, 2013, which the court granted that same day, Respondent having failed to comply with the deadline to file a verified response to the complaint by May 27, 2013.
21. Respondent failed to appear at the continued Case Management Conference conducted June 17, 2013. Respondent, given proper notice of the further continued Case Management Conference date, also failed to appear at the September 9, 2013, hearing.
22. On December 5, 2013, Mercedes counsel filed a request for court judgment premised upon the earlier default.

23. On December 13, 2013, judgment by court by default was entered against Velarde.

24. On February 27, 2014, Respondent attempted once again to be relieved as counsel for Velarde. The court granted the requested withdrawal on April 28, 2014.

CONCLUSIONS OF LAW:

25. By filing an unverified answer on behalf of Velarde when a verified answer was required; by failing to oppose a motion to strike Velarde's answer and enter his default; by failing to appear at case management conferences conducted March 25, 2012, June 17, 2012 and September 9, 2012; by failing to appear at the hearing of the motion to strike Velarde's answer and enter his default on May 10, 2012; and by failing to oppose the request to enter Velarde's default judgment, Respondent intentionally, recklessly, or repeatedly failed to perform legal services with competence in willful violation of Rules of Professional Conduct, rule 3-110(A).

26. By failing to advise his client, Andres Velarde, that a verified answer need be filed by March 6, 2012, at risk of a motion to strike the answer and enter his default; that a motion to strike Velarde's answer and enter his default was filed on March 15, 2012; that the court ordered that a verified answer was required to be filed by May 27, 2012; that if a verified answer was not filed by May 27, 2012, that Velarde's default would be entered; that the motion to strike Velarde's answer was granted on May 10, 2012; that the Respondent's motion to withdraw as attorney of record was denied on May 10, 2012; that plaintiff had filed and served a request to enter Velarde's default judgment; and that plaintiff had secured a \$62,000 judgment against Velarde, Respondent failed to keep Respondent's client, Andres Velarde, reasonably informed of significant developments in a matter in which Respondent had agreed to provide legal services, in willful violation of Business and Professions Code, section 6068(m).

27. By failing to take any action on the client's behalf after Respondent filed a motion to be relieved as counsel on or about March 6, 2013, and thereafter failing to inform the client that Respondent was withdrawing from employment, Respondent failed, upon termination of employment, to take reasonable steps to avoid reasonably foreseeable prejudice to Respondent's client, in willful violation of Rules of Professional Conduct, rule 3-700(A)(2).

AGGRAVATING CIRCUMSTANCES.

Harm (Std. 1.5(f)): Respondent's failure to secure and file a timely verified answer to the complaint, advise the client of the need for a verified answer and his failure to oppose the motion to strike the unverified answer and secure the client's default, ultimately resulted in the entry of a default judgment against the client in excess of \$62,000, and caused significant harm to the client. (*In the Matter of Bach* (Review Dept. 1991) 1 Cal. State Bar Ct. Rptr. 631, where attorney's loss of client's cause of action constituted significant harm.)

Multiple Acts of Misconduct (Std. 1.5(b)): Respondent committed multiple acts of misconduct, specifically violations of Rules of Professional Conduct, rule 3-110(A) [failure to perform], rule 3-700(A)(2) [improper withdrawal from employment] and Business and Professions Code section 6068(m) [failure to communicate significant event].

MITIGATING CIRCUMSTANCES.

Additional Mitigating Circumstances:

Pretrial Stipulation: Respondent has stipulated to misconduct and thereby demonstrated his cooperation with the State Bar and saved the State Bar's 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 admits to committing three acts of professional misconduct. Standard 1.7 (a) requires that where a Respondent acknowledges two or more acts of misconduct, and different sanctions are prescribed by the standards that apply to those acts, the sanction imposed shall be the more or most severe prescribed in the applicable standards. Standard 1.7(b) provides where aggravating circumstances are found and the net effect demonstrates a greater sanction is needed to fulfill the primary purposes of discipline, it is appropriate to recommend greater discipline than otherwise specified in a given standard.

The most severe sanction applicable to Respondent's misconduct is found in standard 2.15, which applies to Respondent's violation of rule 3-700(A)(2). Standard 2.15 provides that actual suspension not to exceed three years or reproof is appropriate for a violation of the Rules of Professional Conduct not otherwise specified in the Standards.

The magnitude of the misconduct is significant. In this matter, Respondent's conduct in repeatedly failing to perform competently and keep his client advised of pertinent and critical requirements necessary to his best defense, constitutes significant harm. Respondent initially failed to appreciate that his client's answer needed to be verified, and upon being so advised by opposing counsel, did nothing constructive to address this issue or advise his client of the serious ramifications associated with a failure to verify the answer. Rather, Respondent feigned a breakdown of the attorney client relationship premised upon his client's failure to timely replenish requested attorney's fees in strict compliance with the terms of their retainer agreement. On this basis Respondent filed a motion to withdraw on March 6, 2013, and refused to take the motion off calendar even after the client came forward and paid the requested attorney's fees on March 18, 2013. Simultaneous with this conduct, Respondent essentially acquiesced in letting opposing counsel follow through as threatened and file a motion to strike the unverified answer and enter his client's default, where he ignored the deadline for serving and filing a verified answer by March 6, 2013, as requested.

Respondent failed to advise his client of the granting of the motion to strike the unverified answer until May 24, 2012, three days before the deadline for filing a verified response fixed by the court within its order of May 10, 2013. Similarly, Respondent failed to advise the client that his withdrawal motion was denied on May 10, 2013, and Respondent seemingly proceeded from that day forward as if he was no longer attorney of record. Respondent failed to appear at successive case management conferences and did nothing to competently and effectively remove himself as attorney of record until April 28, 2014. In the interim, Respondent had acquiesced in allowing a \$62,000 default judgment to be entered against his client with neither the courtesy of tokenistic opposition nor advisements to the client of this deleterious outcome.

This series of unexcused lapses in professional ethics, over a significant period of time, indicates that discipline at the very low end of the range in Standard 2.15 would not be appropriate. Therefore, this matter warrants a thirty day actual suspension, two year stayed suspension and two years of probation. The discipline is also consistent with case law. (*Layton v State Bar* (1991) 50 Cal. 3rd 889 [30 day actual for failure to use reasonable diligence to accomplish employed objectives, failure to perform competently; in mitigation no prior record in 30 years of practice and the current misconduct did not evidence a pattern; there were no aggravating factors]; *Bach v State Bar* (1991) 52 Cal. 3rd 1201 [single client matter with failure to perform competently, improper withdrawal, failure to refund unearned fees and failure to cooperate resulting in 30 day actual; in aggravation Respondent refused to participate in mandatory fee arbitration and denied responsibility for the anxiety and inconvenience visited upon client; mitigation consisted of 20 years discipline free practice]).

COSTS OF DISCIPLINARY PROCEEDINGS.

Respondent acknowledges that the Office of the Chief Trial Counsel has informed Respondent that as of October 24, 2014, the prosecution costs in this matter are approximately \$3497. 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, State Bar Client Trust Accounting School, and/or any other educational course to be ordered as a condition of reproof or suspension. (Rules Proc. of State Bar, rule 3201.)

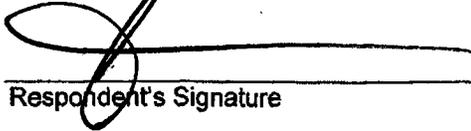
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In the Matter of: PATRICK THOMAS SANTOS	Case number(s): 13-O-16476 LMA
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SIGNATURE OF THE PARTIES

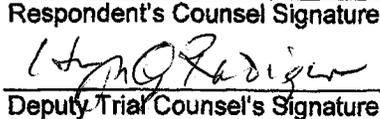
By their signatures below, the parties and their counsel, as applicable, signify their agreement with each of the recitations and each of the terms and conditions of this Stipulation Re Facts, Conclusions of Law, and Disposition.

11/4/14
Date


Respondent's Signature

Patrick Thomas Santos
Print Name

November 10 '14
Date


Respondent's Counsel Signature
Deputy Trial Counsel's Signature

Print Name
Hugh G. Radigan
Print Name

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In the Matter of: PATRICK THOMAS SANTOS	Case Number(s): 13-O-16476- LMA
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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.

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.)**

NOVEMBER 20, 2014
Date


GEORGE E. SCOTT, JUDGE PRO TEM
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 November 21, 2014, 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:

PATRICK T. SANTOS
LAW OFFICE OF PATRICK T SANTOS
PO BOX 6159
NORTH HOLLYWOOD, CA 91603

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

HUGH G. RADIGAN, Enforcement, Los Angeles

I hereby certify that the foregoing is true and correct. Executed in San Francisco, California, on November 21, 2014.



Mazie Yip
Case Administrator
State Bar Court