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JUN 02 2015

1 LAW OFFICES OF FRANKLIN S. ADLER
State Bar Number: 056417
2 424 South Beverly Drive
Beverly Hills, California 90212
3 (310) 553-8533

4 Counsel for Petitioner:
MANUEL LOPEZ
5

STATE BAR COURT CLERK'S OFFICE
SAN FRANCISCO

RECEIVED

7 MAY 18 2015
8

STATE BAR COURT

STATE BAR COURT CLERK'S OFFICE HEARING DEPARTMENT - SAN FRANCISCO
SAN FRANCISCO

10

11 In the Matter of:

Case Nos: 13-O-16607; 14-O-02064

12 MANUEL LOPEZ
13 No. 40235

[PROPOSED] VERIFIED RESPONSE
TO THE NOTICE OF DISCIPLINARY
CHARGES

14 A Member of the State Bar
15

16 TO THE HONORABLE PAT MCELROY, JUDGE OF THE STATE BAR COURT:
17

18 MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF [PROPOSED]
19 VERIFIED RESPONSE TO THE NOTICE OF DISCIPLINARY CHARGES

21 I.
22 THE FACTUAL BASIS

23 Pursuant to his attached Declaration, Mr. Lopez is the aggrieved victim of a sharpster who
24 inveigled him into taking pity on her by allowing her temporary residence in the sleeping quarters of
25 his law office. Upon his discovery that she was intercepting his legal mail when he heard from several
26 clients that she was betraying him by recommending that the clients go elsewhere, he ordered her to
27 leave. She refused and began a series of retaliatory acts including changing the locks several times
28

[PROPOSED] VERIFIED RESPONSE TO THE NOTICE OF DISCIPLINARY CHARGES

1 to both his mailbox and the entry to his building, stealing his mail and packing Mr. Lopez' office with
2 adult males appearing to be intimidating gang members resulting in his being locked out of his office,
3 unable to properly perform his professional tasks and missing mail both from the State Bar and other
4 sources relevant to his practice. He has been unable to timely respond to the within charges and
5 perform in the manner expected of a member of the California State Bar.

6 **II.**

7 **THE LAW**

8 **A.**

9 California Code of Civil Procedure, §473(b) states:

10 “(b) The court may, upon any terms as may be just, relieve a party
11 or his or her legal representative from a judgment, dismissal, order, or
12 other proceeding taken against him or her through his or her mistake,
13 inadvertence, surprise, or excusable neglect. Application for this relief
14 shall be accompanied by a copy of the answer or other pleading
15 proposed to be filed therein, otherwise the application shall not be
16 granted, and shall be made within a reasonable time, in no case
17 exceeding six months, after the judgment, dismissal, order, or
18 proceeding was taken.”

19 California Code of Civil Procedure, §473(b).

20 **B.**

21 The policy of the law is that controversies should be heard and disposed on their merits.

22 (Fausyi v. Permatex, Inc. (2008) 167 Cal.App.4th 681, 694-703.)

23 **C.**

24 A trial court has a wide discretion to grant relief under Code of Civil Procedure Section 473.

25 (Berman v. Klassman (1971) 17 Cal.App.3d 900, 905).

26 **D.**

27 Code of Civil Procedure Section 473(b) is a remedial measure to be liberally construed, and
28 any doubts existing as to the propriety of setting aside a default thereunder will be resolved in favor
of a hearing on the merits. (Berman v. Klassman (1971) 17 Cal.App.3d 900, 910).

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1 **III**

2 **RESPONSE PURSUANT TO RULE 5.43**

3 (A) **Time to File Response:** The within Notice of Disciplinary Charges was received by
4 respondent Lopez at his residence at , on January 30th, 2017. Mr. Lopez sent two letters to State Bar
5 Deputy Trial Counsel Ms. Lara Bairamian [hereinafter "DTC Bairamian"] requesting an extension of
6 time within which to submit his response in light of the short notice of time within which to respond.
7 (Please see Exhibits 1 and 2 [letters], attached hereto and made a part hereof.) No response was
8 received relative to an extension of time. On February 6th, 2015, I first contacted my current counsel,
9 Franklin S. Adler.

10 (B) **Stipulated Extension:** Inapplicable inasmuch as no stipulation was reached with DTC
11 Bairamian.

12 (C) **Content of Response:** The new address for service of documents upon Mr. Lopez is his
13 residence located at 10242 Monaco Drive, Rancho Cucamonga 91737.

14 (1) Mr. Lopez responds to each of the within charges with a specific admission or
15 denial and will include other facts relevant to a defense.

16 **A. COUNT ONE - Case No. 13-O-16607 - B&P Code §6068(o)(3)**

17 Mr. Lopez admits that he did not report to the State Bar the imposition of
18 sanctions imposed by the United States Court of Appeals for the Ninth Circuit for failure to pay court
19 fees on a Notice of Appeal. However, he later discussed the imposition of said sanctions and his
20 inability to pay those sanctions with State Bar Investigator James Murphy. Lopez also moved to
21 rescind those sanctions. (Please see Exhibit 3, attached hereto and made a part hereof.) That motion
22 was denied.

23 **B. COUNT TWO - Case No. 13-O-16607 - B&P Code §6103**

24 Although Mr. Lopez admits that he failed to pay the sanctions ordered by the
25 United States Court of Appeals for the Ninth Circuit, he nonetheless denies that said failure was willful
26 or intentional given that he did not then possess the monies with which to pay said sanctions.

27 ///

28 **[PROPOSED] VERIFIED RESPONSE TO THE NOTICE OF DISCIPLINARY CHARGES**

1 Mr. Lopez filed a motion in the Ninth Circuit to rescind said sanctions which was denied by
2 the Court. He discussed this matter with State Bar Investigator James Murphy and informed Mr.
3 Murphy that he (Lopez) was in a "financial slump" because his client list was below normal and a
4 large number of those clients he had were themselves in financial distress and did not follow through
5 on their promises to pay Mr. Lopez those fees he had earned. To his credit, Mr. Murphy told Mr.
6 Lopez that "...we don't have a Debtor's Prison in this country."

7 Mr. Lopez provides the sole support for his wife and three teen-age children.

8 **B. COUNT THREE - Case No. 14-O-02064 - B&P Code §6068(m)**

9 Petitioner denies this accusation in that his client in the matter addressed was
10 Marisol, not Jose, Diaz.

11 **C. COUNT FOUR - Case No. 14-O-02064 - B&P Code §3-110(A)**

12 Petitioner denies this accusation. When initially contacted by the parents and
13 husband of client, Marisol Diaz, Petitioner was asked to seek post-conviction relief on her behalf after
14 a plea which resulted in her conviction for the crime of felony mayhem. (Penal Code §203). Petitioner
15 researched the potentially available avenues of post-conviction relief (appeal and Writ of Habeas
16 Corpus) and discovered that the time for appeal had expired long before Petitioner was initially
17 contacted by the family. Petitioner determined that the Writ procedure would not lie because he would
18 be unable to establish any incompetence by Diaz' attorney in resolving the most serious crime
19 committed by Ms. Diaz. In a strict sense, the revelation that no relief was possible is a legal service
20 which Petitioner performed for his client.

21 **D. COUNT FIVE - Case No. 14-O-02064 - B&P Code §3-310(F)**

22 Petitioner admits that he never obtained informed written consent from Ms. Diaz
23 to represent her in the matter and manner her family desired him to perform; however, that same family
24 informed Petitioner that Ms. Diaz was then suffering from extremely severe mental problems which
25 would manifest themselves whenever she (Ms. Diaz) was in a stressful situation which would include
26 discussing her then pending felony matter with Petitioner. For these reasons, Petitioner determined
27 that it would not be fruitful to proceed further with the matter.

28 **[PROPOSED] VERIFIED RESPONSE TO THE NOTICE OF DISCIPLINARY CHARGES**

1 Further, there was no antagonistic relationship between Ms. Diaz and her family members
2 concerning her legal difficulties or the payment of money to Mr. Lopez.

3 **E. COUNT SIX - Case No. 14-O-02064 - B&P Code §3-700(D)(2)**

4 Petitioner denies that he willfully violated the within referenced Rule but
5 admits that both at the time of the filing of the charges and the filing of the Notice of Entering Default,
6 he had not refunded any monies because his financial situation precluded such behavior. However,
7 although he did not promptly refund any monies, he has refunded \$2,000.00 to the Diaz family via
8 two \$1,000.00 checks drawn by Western Union and mailed to State Bar Investigator James Murphy
9 so as to eliminate any possibility that those monies fail to arrive at the Diaz destination. (Exhibit 4,
10 photocopy of Western Union checks with check numbers obliterated, attached hereto and made a part
11 hereof.)

12 **ADDENDUM TO VERIFIED RESPONSE:**

13 Since Mr. Lopez filed his initial materials in this matter, he has come into possession of a
14 number of documents pertaining to other allegedly criminal activities of Ms. Ana Maria Lopez. These
15 documents are attached hereto as Exhibits and present a clear picture of the nefarious behavior of Ms.
16 Lopez. In order, these documents are:

- 17 1. Police reports filed by Mr. Lopez (Exhibits 5 and 6);
- 18 2. documents containing names of clients and identification information stolen from the files
19 of Mr. Lopez by Ms. Lopez for what Mr. Lopez believes to be a business of creating false
20 identification information for customers (Exhibits 7, 8 and 9);
- 21 3. a Declaration from Mr. Raul Moreno in which he describes Ms. Lopez attempting to steer
22 him away from being represented by Mr. Lopez to another attorney (Exhibit 10);
- 23 4. two documents from the Orange County Criminal Court public computer which describe
24 an "Ana Marian Lopez" as being a co-defendant with six gentlemen arrested on March 19th, 2015,
25 currently charged with violating Penal Code §487h [Grand Theft of cargo] under case number
26 15NF0950. (Exhibits 10 and 11.)

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CONCLUSION

For the reasons mentioned hereinabove, it is respectfully requested that this Honorable Court dismiss the within six Counts representing the charges filed against Mr. Manuel Lopez and grant whatever further relief this Court deems proper.

Dated: May 15, 2015

Respectfully Submitted,

LAW OFFICES OF FRANKLIN S. ADLER



FRANKLIN S. ADLER
Attorney for Petitioner
MANUEL LOPEZ

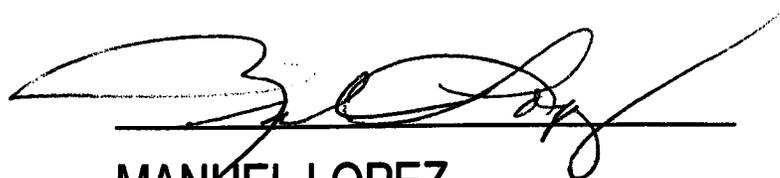
VERIFICATION

STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES) ss.

I, Manuel Lopez have read the foregoing [PROPOSED] VERIFIED RESPONSE TO THE NOTICE OF DISCIPLINARY CHARGES and know of its contents. I am a party to this action. The matters stated in the foregoing documents are true of my own knowledge except as to those matters stated on information and belief, and as to those matters, I believe them to be true.

Executed on May 15, 2015, at Beverly Hills, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.



MANUEL LOPEZ

EXHIBIT #1

Law Office of Manuel Lopez
P.O. Box 86728
Los Angeles, CA 90086

The State Bar of California
Office of the Counsel
Lara Bairamian Deputy Trial Counsel
845 South Figueroa St.
Los Angeles, CA 90017

February 2, 2015

Case No.: 13016607
14-0-02064
Fax No.: (213) 765-1383

Dear Ms. Bairamian:

I received the Notice of Disciplinary Charges on Friday January 30, 2015 and not on November 21, 2014 as a result of difficulty with the mail. The locks on the mail box were broken by Ana Lopez. Ana Lopez has been controlling the mail and my office at 1186 W. Sunset Blvd. Los Angeles, CA 90012 and has changed the locks at the location several times so that I cannot enter. I have used a locksmith one time where I paid \$ 900.00 and also called the Los Angeles Police Department to enter my office. My wife helped me replace the locks on another occasion and at this time she has again changed the locks. The Los Angeles Police Department has told her not to block my entry, but to no avail.

I hope that you will see fit to withdraw the Request for Default as I received the Notice of Disciplinary charge on January 30, 2015 when it was mailed to my residence as of January 29, 2015 I have as post office box # 86728 Los Angeles, CA 90086. In so far as telephone number listed for the office, I do not have access to the office phone as I was locked out by Ana Lopez.

I need time to respond to the charges. Please find enclosed the Declaration of Ronald Cardona.

Very truly yours,

MANUEL LOPEZ

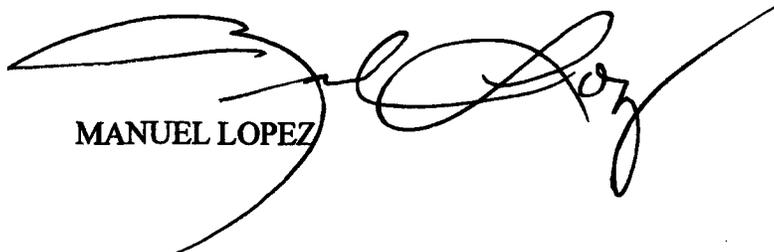
A handwritten signature in black ink, appearing to read 'Manuel Lopez', written over a large, stylized, circular flourish that extends to the left and bottom of the signature.

EXHIBIT #2

Law Office of Manuel Lopez
P.o. Box 86728
Loas Angeles CA, 90086

February 4, 2015

State Bar of California
Lara Bairamian
Deputy Trial Counsel
Fax: (213)765-1383

Dear Ms. Bairamian:

Ana Lopez is still blocking my entrance to my office and is an agent of Laverne Hardin, who is a paralegal from Upland. Clients have reported to me since August of 2014 that both Laverne Hardin and Ana Lopez have contacted them to go to Laverne Hardin's office so that she can take over their cases. Laverne Hardin has counseled and assisted Ana Lopez in locking me out of my office. Their actions have been to keep me from my office, files, and clients while they contact the clients. On July 14, 2014 Laverne Hardin filed he case of Jorge Tista v. John Setlich in the Los Angeles County Superior Court Central District with my signature forged on the complaint. Laverne Hardin also filed a personal injury matter in the Riverside County Superior Court with my name forged on the compliant. On November 16, 2014, I took all of the forged documents to the Upland California Police Department. Both Ana Lopez and Laverne Hardin have been interfering with my office with the intent to do damage and for their benefit.

Very Truly Yours,

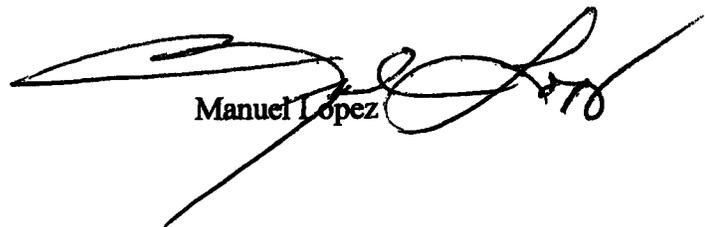

Manuel Lopez

EXHIBIT #3

LAW OFFICES OF MANUEL LOPEZ
1186 W. SUNSET BLVD.
LOS ANGELES, CA 90012
Phone No.: (213) 481-0205
Fax No.: (213) 481-8314

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

UNITED STATES OF AMERICA)	No.: 13-50099
Plaintiff,)	
)	D.C. No.: 211-cr-00472-MMM
)	Central District of California
vs.)	Los Angeles
)	
AOREO PEREZ CRUZ, aka Arturo, Aka)	REQUEST TO RESCIND SANCTIONS
Peniche, Aka Aurelio Perez-Cruz)	
)	
Defendant)	

Comes now Manuel Lopez and request that the Court rescind the sanctions imposed in this matter in that my office had the power disconnected by the Department of Water and Power at or about the time that the court was taking action on this matter. My secretary could not work without power. Many things got out of control as a result of no power and staff problems. I apologize to the Court. It was an embarrassing situation. My office suffered a financial slump and I could not pay for transcripts and could not finance costs at the time.

Dated: April, 11,2014

Respectfully submitted,

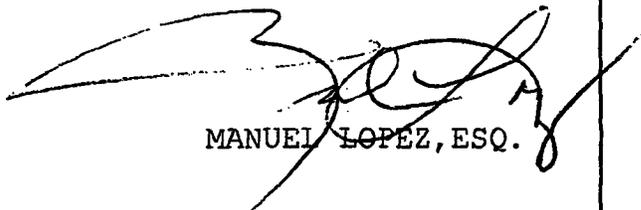

MANUEL LOPEZ, ESQ.

EXHIBIT #4

WESTERN UNION

PAY-O-MATIC

(ISSUING AGENT)

A 116946 D 022715
L 1433 05
171588419045 L 000148

\$ 1000.00

PAY EXACTLY ONE THOUSAND DOLLARS AND NO CENTS

PAY TO THE ORDER OF JOE / ~~JOE~~ SUSIE GARCIA

PAYMENT FOR/ACCT. #

PURCHASER'S ADDRESS P.O. BOX 86728, LOS ANGELES, CA

PURCHASER'S SIGNATURE
PURCHASER BY SIGNING YOU AGREE TO THE TERMS ON THE REVERSE SIDE
90086

⑆102100400⑆ 40171588419045⑈

WESTERN UNION

PAY-O-MATIC

(ISSUING AGENT)

A 116946 D 022715
L 1433 05
171588419054 L 000148

\$ 1000.00

PAY EXACTLY ONE THOUSAND DOLLARS AND NO CENTS

PAY TO THE ORDER OF JOE / SUSIE GARCIA

PAYMENT FOR/ACCT. #

PURCHASER'S ADDRESS P.O. BOX 86728, LOS ANGELES, CA

PURCHASER'S SIGNATURE
PURCHASER BY SIGNING YOU AGREE TO THE TERMS ON THE REVERSE SIDE
90086

⑆102100400⑆ 40171588419054⑈

EXHIBIT #5

INVESTIGATIVE REPORT

MC: MULTIPLE DRS ON THIS REPORT

CASE SCREENING FACTOR(S) <input checked="" type="checkbox"/> SUSPECT/VEHICLE NOT SEEN <input type="checkbox"/> PRINTS OR OTHER EVIDENCE NOT PRESENT <input type="checkbox"/> MO NOT DISTINCT <input type="checkbox"/> PROPERTY LOSS LESS THAN \$5,000 <input type="checkbox"/> NO SERIOUS INJURY TO VICTIM <input type="checkbox"/> ONLY ONE VICTIM INVOLVED		REPORT OF: THEFT INVEST: RAMP INC # 15032300192 DR #	
VICTIM LAST NAME, FIRST, MIDDLE (OR NAME OF BUSINESS): LOPEZ, MANUEL ADDRESS: 1186 W. SUNSET BL. LA CA 90012 E-MAIL ADDRESS: _____ CELL PHONE: _____ DR. LIC. NO. (IF NONE, OTHER ID & NO.): H0251075 CA FOREIGN LANGUAGE SPOKEN: _____ OCCUPATION: ATTORNEY		SEX: M DESC: HT: 6'04" WT: 175 AGE: 35 DOB: 02/26/40 ZIP: 90012 PHONE: (213) 605-5439	
PREMISES (SPECIFIC TYPE) <input type="checkbox"/> ATM SINGLE FAMILY RESIDENCE		LOCATION OF OCCURRENCE: CLIENTS' FILES SAME AS V'S <input checked="" type="checkbox"/> RES. <input type="checkbox"/> BUS. <input type="checkbox"/> R.D. DATE & TIME OF OCCURRENCE: 02/15/15 - 0900 DATE & TIME REPORTED TO PD: 03/23/15 - 1115	
ENTRY 459/BFV POINT OF ENTRY POINT OF EXIT <input type="checkbox"/> FRONT <input type="checkbox"/> REAR <input type="checkbox"/> SIDE <input type="checkbox"/> ROOF <input type="checkbox"/> FLOOR <input type="checkbox"/> OTHER		PRINTS BY PREL INV. ATTEMPT OBTAINED <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	
VICT'S VEH. (IF INVOLVED) YEAR, MAKE, TYPE, COLOR, LIC. NO.		NOTIFICATION(S) (PERSON & DIVISION) _____ CONNECTED REPORT(S) (TYPE & DR #) _____	
MO IF LONG FORM, LIST UNIQUE ACTIONS. IF SHORT FORM, DESCRIBE SUSPECT'S ACTIONS IN BRIEF PHRASES, INCLUDING WEAPON USED. DO NOT REPEAT ABOVE INFO BUT CLARIFY REPORT AS NECESSARY. IF ANY OF THE MISSING ITEMS ARE POTENTIALLY IDENTIFIABLE, ITEMIZE AND DESCRIBE ALL ITEMS MISSING IN THIS INCIDENT IN THE NARRATIVE.			
UNKNOWN SUSPECT(S) STOLE VICTIM'S CLIENT FILES AND INFORMATION. INFORMATION TAKEN BELONGS TO VICTIM'S CLIENTS			
MANDATORY MARY'S RIGHTS CARD PROVIDED TO THE VICTIM <input checked="" type="checkbox"/> MOTIVATED BY HATRED/PREJUDICE <input type="checkbox"/> DOMESTIC VIOLENCE <input type="checkbox"/>			
REPORTING EMPLOYEE(S) INITIALS, LAST NAME: E. MANUA SERIAL NO.: 37344 DIV./DETAIL: RAMP DESK		PERSON SIGNATURE OR RECEIVED BY PHONE: <i>[Signature]</i>	
NOTE: IF SHORT FORM AND VICTIM/PR ARE NOT THE SAME, ENTER PR INFORMATION IN INVOLVED PERSON'S SECTION.			

THIS REPORT DOES NOT CONSTITUTE VALID IDENTIFICATION

KEEP THIS REPORT FOR REFERENCE. INSTRUCCIONES EN ESPANOL AL REVERSO.

Your case will be assigned to a detective for follow-up investigation based upon specific facts obtained during the initial investigation. Studies have shown that the presence of these facts can predict whether a detailed follow-up investigation would likely result in the arrest and prosecution of the suspect(s) or the recovery of property, in a manner that is cost-effective to you, the taxpayer. Significant decreases in personnel have made it impossible for detectives to personally discuss each and every case with all crime victims. A detective will not routinely contact you, unless the detective requires additional information.

TO REPORT ADDITIONAL INFORMATION: If you have specific facts to provide which might assist in the investigation of your case, please contact the detective Monday through Friday, between 8:00 A.M. and 9:30 A.M., or between 2:30 P.M. and 4:00 P.M. at telephone number _____ . If the detective is not available when you call, please leave a message and include the telephone number where you can be reached.

COPY OF REPORT: If you wish to purchase a copy of the complete report, phone (213) 486-8130 to obtain the purchase price. Send a check or money order payable to the Los Angeles Police Department to Records and Identification Division, Box 30158, Los Angeles, CA 90030. Include a copy of this report or the following information with your request: 1) Name and address of victims; 2) Type of report and DR number (if listed above); 3) Date and location of occurrence. NOTE: Requests not accompanied by proper payment will not be processed.

DR NUMBER: If not entered on this form, the DR number may be obtained by writing to Records and Identification Division and giving the information needed to obtain a copy of the report (see above paragraph). Specify that you only want the DR number. It will be forwarded without delay. There is no charge for this service.

CREDIT CARDS/CHECKS: Immediately notify concerned credit corporation or banks to avoid possibility of being liable for someone else using your stolen or lost credit card or check.

HOW YOU CAN HELP THE INVESTIGATION OF YOUR CASE:

- * Keep this memo for reference.
- * If stolen items have serial numbers not available at time of report, attempt to locate them and phone them to the detective at the listed number.
- * If you discover additional losses, complete and mail in the Supplemental Property Loss form given to you by the reporting employee.
- * Promptly report recovery of property.
- * Promptly report additional information such as a neighbor informing you of suspicious activity at time crime occurred.

VICTIM-WITNESS ASSISTANCE PROGRAM: The Los Angeles City and County Victim-Witness Assistance Program (VWAP) can help to determine if you qualify for Victim of Violent Crime compensation. If you qualify, they will assist with filling your claim application. If you are a victim or a witness to a crime and will be going to court, they will explain the court procedures to you. Their staff may also assist you with other problems created by the crime.

To find the program location nearest to you, call the Victim-Witness Assistance Program at the Los Angeles City Attorney's Office (213) 485-6976, or the Los Angeles County District Attorney's Office (800) 380-3811.

VICTIMS OF VIOLENT CRIME COMPENSATION: Refer to paragraph at bottom of reverse side.

EXHIBIT #6

**Los Angeles Police Department
INVESTIGATIVE REPORT**

COMBINED EVID. REPORT
 MULTIPLE DRS ON THIS REPORT

CASE SCREENING FACTOR(S)		REPORT OF: <u>111577</u>		INVEST DIV. <u>1200</u>	INC # <u>7547700</u>	DR # <u>1567</u>				
<input type="checkbox"/> SUSPECT/VEHICLE NOT SEEN <input type="checkbox"/> PRINTS OR OTHER EVIDENCE NOT PRESENT <input type="checkbox"/> MO NOT DISTINCT <input type="checkbox"/> PROPERTY LOSS LESS THAN \$5,000 <input type="checkbox"/> NO SERIOUS INJURY TO VICTIM <input type="checkbox"/> ONLY ONE VICTIM INVOLVED		VICTIM	LAST NAME, FIRST, MIDDLE (OR NAME OF BUSINESS) <u>LOPEZ, ALEXIS</u>		SEX <u>AM</u>	DESC <u>H</u>	HT <u>164</u>	WT <u>70</u>	AGE <u>17</u>	DOB <u>197616</u>
PREMISES (SPECIFIC TYPE) <input type="checkbox"/> ATM			ADDRESS R- <u>10742 Sherman St</u>		ZIP <u>91757</u>	PHONE <u>(213) 465-1107</u>		X <input checked="" type="checkbox"/>		
<u>Street Lamont St</u>			E-MAIL ADDRESS		CELL PHONE					
			DR. LIC. NO. (IF NONE, OTHER ID & NO.) <u>H6751675</u>		FOREIGN LANGUAGE SPOKEN		OCCUPATION <u>Attendant</u>			
ENTRY 459/BFV POINT OF ENTRY		POINT OF EXIT		LOCATION OF OCCURRENCE		SAME AS V'S <input type="checkbox"/> RES. <input checked="" type="checkbox"/> BUS. <input type="checkbox"/> R.D. <input type="checkbox"/>		PRINTS BY PREL. INV. ATTEMPT OBTAINED <input type="checkbox"/> Y <input type="checkbox"/> N		
<input type="checkbox"/> FRONT <input type="checkbox"/> REAR <input type="checkbox"/> SIDE <input type="checkbox"/> ROOF <input type="checkbox"/> FLOOR <input type="checkbox"/> OTHER		METHOD		DATE & TIME OF OCCURRENCE <u>07 15 1986 - 11 27 15 1986</u>		DATE & TIME REPORTED TO PD <u>07 15 1986</u>				
INSTRUMENT/TOOL USED		TYPE PROPERTY STOLEN/LOST/DAMAGED <input type="checkbox"/> 03.04.00 GIVEN <input type="checkbox"/>		STOLEN/LOST <u>\$ 1,000</u>		RECOVERED <u>\$</u>		EST. DAMAGED ARSON / VAND. <u>\$</u>		
VICT'S VEH. (IF INVOLVED) YEAR, MAKE, TYPE, COLOR, LIC. NO.			NOTIFICATION(S) (PERSON & DIVISION)			CONNECTED REPORT(S) (TYPE & DR #)				
MO IF LONG FORM, LIST UNIQUE ACTIONS. IF SHORT FORM, DESCRIBE SUSPECT'S ACTIONS IN BRIEF PHRASES, INCLUDING WEAPON USED. DO NOT REPEAT ABOVE INFO BUT CLARIFY REPORT AS NECESSARY. IF ANY OF THE MISSING ITEMS ARE POTENTIALLY IDENTIFIABLE, ITEMIZE AND DESCRIBE ALL ITEMS MISSING IN THIS INCIDENT IN THE NARRATIVE. <u>Male Suspect removed the victim's items from this vehicle while the victim slept.</u>										
MANDATORY MARY'S RIGHTS CARD PROVIDED TO THE VICTIM <input type="checkbox"/>			HATE CRIME/INCIDENT <input type="checkbox"/>			DOMESTIC VIOLENCE <input type="checkbox"/>				
REPORTING EMPLOYEE(S)		INITIALS, LAST NAME	SERIAL NO.	DIV./DETAIL	PERSON REPORTING	SIGNATURE	DR RECEIVED BY PHONE <input type="checkbox"/>			
		<u>1-16012</u>	<u>2472</u>	<u>RAM</u>	<u>[Signature]</u>	<u>[Signature]</u>				
NOTE: IF SHORT FORM AND VICTIM/PR ARE NOT THE SAME, ENTER PR INFORMATION IN INVOLVED PERSONS SECTION.										

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DR NUMBER: If not entered on this form, the DR number may be obtained by writing to Records and Identification Division and giving the information needed to obtain a copy of the report (see above paragraph). Specify that you only want the DR number. It will be forwarded without delay. There is no charge for this service.

CREDIT CARDS/CHECKS: Immediately notify concerned credit corporation or banks to avoid possibility of being liable for someone else using your stolen or lost credit card or check.

HOW YOU CAN HELP THE INVESTIGATION OF YOUR CASE:

- * Keep this memo for reference.
- * If stolen items have serial numbers not available at time of report, attempt to locate them and phone them to the detective at the listed number.
- * If you discover additional losses, complete and mail in the Supplemental Property Loss form given to you by the reporting employee.
- * Promptly report recovery of property.
- * Promptly report additional information such as a neighbor informing you of suspicious activity at time crime occurred.

VICTIM-WITNESS ASSISTANCE PROGRAM: The Los Angeles City and County Victim-Witness Assistance Program (VWAP) can help to determine if you qualify for Victim of Violent Crime compensation. If you qualify, they will assist with filling your claim application. If you are a victim or a witness to a crime and will be going to court, they will explain the court procedures to you. Their staff may also assist you with other problems created by the crime.

To find the program location nearest to you, call the Victim-Witness Assistance Program at the Los Angeles City Attorney's Office (213) 485-6976, or the Los Angeles County District Attorney's Office (800) 380-3811.

VICTIMS OF VIOLENT CRIME COMPENSATION: Refer to paragraph at bottom of reverse side.

EXHIBIT #7

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EXHIBIT #8

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100-15-1000
100-15-1000

ATTACHMENT 2

03396970
227 West 11th St
Menlo Park, CA. 94025

~~XXXXXXXXXX~~ (E)
Rafael Valdovinos
11-08-1971
116-74-9774
429 E. 127 St.
Los Angeles CA. 90061

~~Norma~~ 05/18/1960
Maria Guzman EXP
614-62-8748-05
A3158307 → 310-890-5
213-949-
849 E. Mead
Carson CA. 90745

Alonso Arce (E)
09-11-1965
622-09-5189
12-11-1965

EXHIBIT #9

EXHIBIT #10

DECLARATION OF RAUL MORENO

I Raul Moreno, Here by state and declare that on the about September 2014 I received a call from Ana Lopez telling me that Lavern Harden an Attorney would take any case I had with attorney Manuel Lopez and he would charge me \$250 to review the file and I told her that I was not interested..

I declare that the above is true and correct to the best of my knowledge Under penalty of perjury.



EXHIBIT #11

Case Search

The information provided on and obtained from this site does not constitute the official record of the Court. This information is provided as a service to the general public. Any user of this information is hereby advised that it is being provided "as is". The information provided may be subject to errors or omissions. Visitors to this site agree that the Court is not liable for errors or omissions of any of the information provided. Visitors further consent to access the record only as instructed by the Court and consent to the Court's monitoring of access to the records. The Court may deny access to a member of the public for failure to comply with any of these conditions of use. Any person who willfully destroys or alters any court record maintained in electronic form is subject to the penalties imposed by Government Code section 6201. The Public Index shall not be re-copied or re-distributed without expressed consent from the Superior Court of California, County of Orange. The Court specifically disclaims any and all liability if the Public Index is obtained from a third party entity.

[Case Search Home](#)

Criminal/Traffic**Case Search**

Case Number: 15NF0950

Search by Person or Business Name: [click here](#)

Civil/Small Claims**Family Law****Probate****All Cases**

Results 1 - 8 of 8

Person/Business Name	Party Role	Case Number	Case Level/Type	Filing Date
Emmanuel Aguilar		15NF0950	Felony	04/09/2015
Jerry Escobar		15NF0950	Felony	04/09/2015
Richard Anthony Gallardo		15NF0950	Felony	04/09/2015
Anna Maria Lopez		15NF0950	Felony	04/09/2015
Nicholas Edward Lovell		15NF0950	Felony	04/09/2015
Alexander Michael Michel		15NF0950	Felony	04/09/2015
Luis Angel Rivera		15NF0950	Felony	04/09/2015

EXHIBIT #12

Search By Name | List Inmate Names | FAQ | Visitor Information
Bail Agent Registration, [click here](#).

Due to security concerns, we have discontinued posting detailed inmate information on this website. Information required to be disclosed under Government Code section 6254(f)(1) of the California Public Records Act may be obtained in person at any Orange County Sheriff jail facility.

Results for booking number: 2874598

Inmate Name:		LOPEZ , ANNA MARIA	
Date of Birth:	10-25-1973	Next Appearance Date:	
Sex:	Female	Next Appearance Court:	
Race:	Mexican-Latin American	Custody Status:	Released
Height:	5' 11"	Bail Amount:	\$0.00
Weight:	180	Arrested on:	03-19-2015
Hair Color:	Brown	Housing Location:	Central Womens Jail
Eye Color:	Brown	Release Type:	Bond Posted
Occupation:		Release Date:	03-21-2015 07:55:00

Inmate charge information will be provided by e-mail to approved attorneys and licensed bail agent only. All other requests for charge information must be made in person at any Orange County Sheriff jail facility. To receive the active charges by email for this inmate enter your username and password below. Bail agents and attorneys must be registered and approved in order to receive active charges by e-mail.

Attorney registration, please [click here](#).

Bail agent registration, please [click here](#).

[Change Password](#) | [Forgot Password](#)

Username: _____ Password: _____

The data contained in this web site should not be relied upon for any type of legal action. Anyone who uses this information to commit a crime or to harass an inmate or his or her family may be subject to criminal prosecution and civil liability. Extreme care must be taken in the use of information because mistaken identification may occur when relying solely upon a name to identify individuals.

ALTHOUGH THE INFORMATION ON THIS SITE IS BELIEVED TO BE CORRECT, INFORMATION IS PROVIDED ON AN "AS IS" BASIS, AND ACCURACY AND/OR COMPLETENESS CANNOT BE GUARANTEED. NO WARRANTY OF ANY KIND IS GIVEN WITH RESPECT TO THE CONTENTS OF THIS WEBSITE.

Except as provided in Section 2074 and 2079.5 [sic], no bail licensee shall solicit any person for bail in any prison, jail, or other place of detention of persons, court or public institution connected with the administration of justice; or in the halls or corridors adjacent thereto; provided that a bail licensee may in such halls, corridors or in other rooms or areas where not prohibited by local rule or ordinance transact bail with persons specified in Section 2079 who have prior to transaction, requested his services.

The Department of Insurance does have the continuing authority to investigate and prosecute violations of the Insurance Code and the Insurance Commissioner's regulations. The Department will investigate complaints and will take appropriate action where necessary.

The Orange County Sheriff's Department reserves the right to deny any applicant and revoke current users due to abuse of access. Any misuse by anyone using the ID/Password issued to this agency can and will result in the loss of future use for the agency and other agencies using the same license number.

1 **PROOF OF SERVICE**

2
3 I, FRANKLIN S. ADLER, am an active member of the State Bar of California, not a party to
4 this action, and my business address is 424 South Beverly Drive, Beverly Hills, California 90212.

5 On May 16, 2015, I deposited in the mail at Beverly Hills, California, copies of the attached
6 **[PROPOSED] VERIFIED RESPONSE TO THE NOTICE OF DISCIPLINARY CHARGES** in
7 sealed envelopes, with postage fully prepaid to:

8 (1) Judge Pat McElroy
9 State Bar of California
10 180 Howard Street
11 6th Floor
12 San Francisco, CA 94105 (via Fed-Ex)

13 (2) State Bar of California
14 845 South Figueroa Street
15 Los Angeles, CA 90017

16 (3) Ms. Lara Bairamian
17 State Bar of California
18 845 South Figueroa Street
19 Los Angeles, CA 90017

20 (4) Mr. James Murphy
21 State Bar of California
22 845 South Figueroa Street
23 Los Angeles, CA 90017

24 I declare under penalty of perjury that the foregoing is true and correct and that this Declaration
25 was executed on May 16, 2015, at Beverly Hills, California.

26
27
28

FRANKLIN S. ADLER