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The State Bar of California alleges:

JURISDICTION

1. Edward Medina ("respondent") was admitted to the practice of law in the State of California on December 8, 1999, was a member at all times pertinent to these charges, and is currently a member of the State Bar of California.

COUNT ONE

Case No. 14-N-05138
California Rules of Court, Rule 9.20
[Failure to Obey Rule 9.20]

2. Respondent failed to give the notice required by rule 9.20(a)(1) of the California Rules of Court to the following of respondent's clients who were being represented by respondent in matters pending in the United States Bankruptcy Court for the Southern District of California as of July 9, 2014, as required by Supreme Court order number S217569, in willful violation of rule 9.20 of the California Rules of Court:

- a. William Nordquist in case no. 14-014212-CL7;
- b. Gregory and Tyra Droegemueller in case no. 14-05005-MM13; and
- c. Brian Pigott in case no. 14-01965-LT13.

3. Respondent failed to file the notice required by rule 9.20(a)(4) of the California Rules of Court with the United States Bankruptcy Court for the Southern District of California in the following matters in which respondent was a counsel of record, as required by Supreme Court order no. S217569, in willful violation of rule 9.20 of the California Rules of Court:

- a. *In re Douglas Wright*, case no. 14-05197-LT7;
- b. *In re Gregory and Tyra Droegemueller*, case no. 14-05005-MM13;
- c. *In re Robert Gaffney*, case no. 14-05764-CL13;
- d. *In re Jennifer Volden*, case no. 14-05859-CL13;
- e. *In re Brian Pigott*, case no. 14-01965-LT13;
- f. *In re Teodoro Aurelio Lozano*, case no. 14-06464-MM7;
- g. *In re Anna Jennings*, case no. 14-06465-LT7;
- h. *In re Karen and Daren Daganasol*, case no. 14-03293-LA13;

- 1 i. *In re Danielle and Ulysses Dickerson*, case no. 14-02997-LT7;
2 j. *In re Sheila Cohen*, case no. 14-06589-LT13;
3 k. *In re Roberto and Socorro Marrujo*, case no. 11-02068-MM13;
4 l. *In re Concepcion Ibarra*, case no. 14-01520-LT13;
5 m. *In re Jose and Florina Bravo*, case no. 14-01962-MM13;
6 n. *In re Oscar Monarrez*, case no. 14-02609-CL7;
7 o. *In re Norma Valdez*, case no. 14-02610-MM7;
8 p. *In re Carolina Ruiz*, case no. 14-02611-CL7;
9 q. *In re Jose and Leticia Pina Jimenez*, case no. 14-02613-MM13;
10 r. *In re Policarpo Navarro*, case no. 14-03003-CL7;
11 s. *In re Julio Felix*, case no. 14-04882-MM7;
12 t. *In re Efrain Flores*, case no. 14-06462-LA7;
13 u. *In re Amilkar Pena*, case no. 14-06463-CL7; and
14 v. *In re Raul Perez*, case no. 14-06466-MM7.

15 4. Respondent failed to file a declaration of compliance with rule 9.20 of the California
16 Rules of Court in conformity with the requirements of rule 9.20(c) with the clerk of the State Bar
17 Court by August 18, 2014, as required by Supreme Court order no. S217569, in willful violation
18 of rule 9.20 of the California Rules of Court.

19 5. A true and correct copy of the rule 9.20 order is attached hereto as Exhibit 1 and is
20 incorporated by reference.

21 COUNT TWO

22 Case No. 14-N-05138
23 Business and Professions Code Section 6106
[Moral Turpitude]

24 6. On or about September 8, 2014 and September 29, 2014, respondent filed with the
25 Clerk of the State Bar Court declarations of compliance with rule 9.20 of the California Rules of
26 Court that falsely reported to the State Bar Court that respondent had fully complied with rule
27 9.20(a) of the California Rules of Court, when respondent knew, or was grossly negligent in not
28 knowing, that respondent had failed to comply with rule 9.20(a) of the California Rules of Court,

1 and thereby committed acts involving moral turpitude, dishonesty, or corruption in willful
2 violation of Business and Professions Code section 6106.

3 COUNT THREE

4 Case No. 14-O-04411
5 Rules of Professional Conduct, Rule 1-300(B)
6 [Unauthorized Practice of Law in Another Jurisdiction]

7 7. From on or about July 23, 2014 through on or about August 22, 2014, respondent
8 held himself out as entitled to practice law and actually practiced law in the United States
9 Bankruptcy Court for the Southern District of California by performing the following acts, when
10 to do so was in violation of the regulations of the profession in the United States Bankruptcy
11 Court for the Southern District of California, namely rule 9010 of the Local Bankruptcy Rules of
12 the United States Bankruptcy Court for the Southern District of California, civil rule 83.3 of the
13 Local Civil Rules of Practice for the United States District Court for the Southern District of
14 California, and rule 9010 of the Federal Rules of Bankruptcy Procedure, in willful violation of
15 the Rules of Professional Conduct, rule 1-300(B):

- 16 a. On or about July 23, 2014, appearing at a meeting of creditors on behalf of
17 respondent's client, William Nordquist, in case no. 14-04212-CL7; and
18 b. On or about August 22, 2014, filing a document entitled "Amendment to
19 Schedule A & B – Schedule of Real or Personal Property..." on behalf of
20 respondent's client, William Nordquist, in case no. 14-04212-CL7, which
21 bears respondent's electronic signature dated August 21, 2014.

22 COUNT FOUR

23 Case No. 14-O-04411
24 Business and Professions Code Section 6106
25 [Moral Turpitude]

26 8. From on or about July 23, 2014 through on or about August 22, 2014, respondent
27 held himself out as entitled to practice law and actually practiced law in the United States
28 Bankruptcy Court for the Southern District of California by performing the following acts, when
respondent knew, or was grossly negligent in not knowing, that to do so was in violation of the
regulations of the profession in the United States Bankruptcy Court for the Southern District of

1 California, namely rule 9010 of the Local Bankruptcy Rules of the United States Bankruptcy
2 Court for the Southern District of California, civil rule 83.3 of the Local Civil Rules of Practice
3 for the United States District Court for the Southern District of California, and rule 9010 of the
4 Federal Rules of Bankruptcy Procedure, and thereby committed an act involving moral turpitude,
5 dishonesty, or corruption in willful violation of Business and Professions Code section 6106:

- 6 a. On or about July 23, 2014, appearing at a meeting of creditors on behalf of
7 respondent's client, William Nordquist, in case no. 14-04212-CL7; and
8 b. On or about August 22, 2014, filing a document entitled "Amendment to
9 Schedule A & B – Schedule of Real or Personal Property..." on behalf of
10 respondent's client, William Nordquist, in case no. 14-04212-CL7, which
11 bears respondent's electronic signature dated August 21, 2014.

12 COUNT FIVE

13 Case No. 14-O-04411
14 Business and Professions Code Section 6106
15 [Moral Turpitude]

16 9. On or about July 23, 2014, while appearing in the United States Bankruptcy Court for
17 the Southern District of California at a meeting of creditors on behalf of respondent's client,
18 William Nordquist, in case no. 14-04212-CL7, respondent indicated to the trustee that he did not
19 have knowledge of the fact that he was not at that time an active member of the State Bar of
20 California, when respondent knew, or was grossly negligent in not knowing, that he was not at
21 that time an active member of the State Bar of California, and thereby committed an act
22 involving moral turpitude, dishonesty, or corruption in willful violation of Business and
23 Professions Code section 6106.

24 COUNT SIX

25 Case No. 14-O-04786
26 Rules of Professional Conduct, Rule 1-300(B)
27 [Unauthorized Practice of Law in Another Jurisdiction]

28 10. From on or about July 11, 2014 through on or about August 19, 2014, respondent
held himself out as entitled to practice law and actually practiced law in the United States
Bankruptcy Court for the Southern District of California by performing the following acts, when

1 to do so was in violation of the regulations of the profession in the United States Bankruptcy
2 Court for the Southern District of California, namely rule 9010 of the Local Bankruptcy Rules of
3 the United States Bankruptcy Court for the Southern District of California, civil rule 83.3 of the
4 Local Civil Rules of Practice for the United States District Court for the Southern District of
5 California, and rule 9010 of the Federal Rules of Bankruptcy Procedure, in willful violation of
6 the Rules of Professional Conduct, rule 1-300(B):

- 7 a. On or about July 15, 2014, filing a document entitled "Balance of
8 Schedules... with Certificate of Service" on behalf of respondent's client,
9 Douglas Wright, in case no. 14-05197-LT7, which bears respondent's
10 electronic signature dated July 15, 2014;
- 11 b. On or about July 15, 2014, filing a document entitled "Balance of
12 Schedules... with Certificate of Service" on behalf of respondent's clients,
13 Gregory and Tyra Droegemueller, in case no. 14-05005-MM13, which bears
14 respondent's electronic signature dated July 15, 2014;
- 15 c. On or about July 20, 2014, filing documents entitled "Chapter 13 Voluntary
16 Petition..." and "Declaration Re: Electronic Filing" on behalf of respondent's
17 client, Robert Gaffney, in case no. 14-05764-CL13, which bear respondent's
18 electronic signature dated July 18, 2014;
- 19 d. On or about July 24, 2014, filing documents entitled "Chapter 13 Voluntary
20 Petition..." and "Declaration Re: Electronic Filing" on behalf of respondent's
21 client, Jennifer Volden, in case no. 14-05859-CL13, which bear respondent's
22 electronic signature dated July 24, 2014 and respondent's handwritten
23 signature dated July 24, 2014, respectively;
- 24 e. On or about July 31, 2014, filing a document entitled "Ex Parte Motion to
25 Extend Time to *file lien strip motion*" and an attached Declaration and
26 Certificate of Service on behalf of respondent's client, Concepcion Ibarra, in
27 case no. 14-01520, which bear respondent's electronic signature dated July
28 31, 2014;

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- f. On or about August 1, 2014, filing a document entitled
“OPPOSITION/RESPONSE TO OBJECTION TO CONFIRMATION OF
CHAPTER 13 PLAN / STATUS REPORT” on behalf of respondent’s client,
Brian Pigott, in case no. 14-01965-LT13, which bears respondent’s electronic
signature dated August 1, 2014;
- g. On or about August 7, 2014, filing documents entitled “Balance of
Schedules...” and “Initial Chapter 13 Plan” on behalf of respondent’s client,
Jennifer Volden, in case no. 14-05859-CL13, which bear respondent’s
electronic signature dated August 7, 2014;
- h. On or about August 13, 2014, filing documents entitled “Chapter 7 Voluntary
Petition...” and “Declaration Re: Electronic Filing” on behalf of respondent’s
client, Teodoro Aurelio Lozano, in case no. 14-06464-MM7, which bear
respondent’s electronic signature dated August 13, 2014 and respondent’s
handwritten signature dated August 8, 2014, respectively;
- i. On or about August 13, 2014, filing documents entitled “Chapter 7 Voluntary
Petition...” and “Declaration Re: Electronic Filing” on behalf of respondent’s
client, Anna Jennings, in case no. 14-06465-LT7, which bear respondent’s
electronic signature dated August 13, 2014 and respondent’s handwritten
signature dated July 2, 2014, respectively;
- j. On or about August 13, 2014, filing a document entitled “OPPOSITION TO
JUDGMENT ON MOTION FOR RELIEF FOR LACK OF PROPER
SERVICE ON DEBTORS” on behalf of respondent’s clients, Karen and
Daren Daganasol, in case no. 14-03293-LA13, which bears respondent’s
electronic signature dated August 13, 2014;
- k. On or about August 13, 2014, filing a document entitled “Reaffirmation
Agreement Between Debtor and Wells Fargo” on behalf of respondent’s
clients, Danielle and Ulysses Dickerson, in case no. 14-02997-LT7, which
bears respondent’s handwritten signature dated July 14, 2014;

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- l. On or about August 18, 2014, filing documents entitled “Chapter 13 Voluntary Petition...” and “Declaration Re: Electronic Filing” on behalf of respondent’s client, Sheila Cohen, in case no. 14-06589-LT13, which bear respondent’s electronic signature dated August 18, 2014 and respondent’s handwritten signature dated August 18, 2014, respectively; and
- m. On or about August 19, 2014, filing a document entitled “STATUS REPORT ON OPPOSITION TO TRUSTEE’S OBJECTION TO CONFIRMATION” on behalf of respondent’s client, Brian Pigott, in case no. 14-01965-LT13, which bears respondent’s electronic signature dated August 19, 2014.

COUNT SEVEN

Case No. 14-O-04786
Business and Professions Code Section 6106
[Moral Turpitude]

11. From on or about July 11, 2014 through on or about August 19, 2014, respondent held himself out as entitled to practice law and actually practiced law in the United States Bankruptcy Court for the Southern District of California by performing the following acts, when respondent knew, or was grossly negligent in not knowing, that to do so was in violation of the regulations of the profession in the United States Bankruptcy Court for the Southern District of California, namely rule 9010 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Southern District of California, civil rule 83.3 of the Local Civil Rules of Practice for the United States District Court for the Southern District of California, and rule 9010 of the Federal Rules of Bankruptcy Procedure, and thereby committed an act involving moral turpitude, dishonesty, or corruption in willful violation of Business and Professions Code section 6106:

- a. On or about July 15, 2014, filing a document entitled “Balance of Schedules... with Certificate of Service” on behalf of respondent’s client, Douglas Wright, in case no. 14-05197-LT7, which bears respondent’s electronic signature dated July 15, 2014;
- b. On or about July 15, 2014, filing a document entitled “Balance of Schedules... with Certificate of Service” on behalf of respondent’s clients,

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Gregory and Tyra Droegemueller, in case no. 14-05005-MM13, which bears respondent's electronic signature dated July 15, 2014;

c. On or about July 20, 2014, filing documents entitled "Chapter 13 Voluntary Petition..." and "Declaration Re: Electronic Filing" on behalf of respondent's client, Robert Gaffney, in case no. 14-05764-CL13, which bear respondent's electronic signature dated July 18, 2014;

d. On or about July 24, 2014, filing documents entitled "Chapter 13 Voluntary Petition..." and "Declaration Re: Electronic Filing" on behalf of respondent's client, Jennifer Volden, in case no. 14-05859-CL13, which bear respondent's electronic signature dated July 24, 2014 and respondent's handwritten signature dated July 24, 2014, respectively;

e. On or about July 31, 2014, filing a document entitled "Ex Parte Motion to Extend Time to *file lien strip motion*" and an attached Declaration and Certificate of Service on behalf of respondent's client, Concepcion Ibarra, in case no. 14-01520, which bear respondent's electronic signature dated July 31, 2014;

f. On or about August 1, 2014, filing a document entitled "OPPOSITION/RESPONSE TO OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN / STATUS REPORT" on behalf of respondent's client, Brian Pigott, in case no. 14-01965-LT13, which bears respondent's electronic signature dated August 1, 2014;

g. On or about August 7, 2014, filing documents entitled "Balance of Schedules..." and "Initial Chapter 13 Plan" on behalf of respondent's client, Jennifer Volden, in case no. 14-05859-CL13, which bear respondent's electronic signature dated August 7, 2014;

h. On or about August 13, 2014, filing documents entitled "Chapter 7 Voluntary Petition..." and "Declaration Re: Electronic Filing" on behalf of respondent's client, Teodoro Aurelio Lozano, in case no. 14-06464-MM7, which bear

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respondent's electronic signature dated August 13, 2014 and respondent's handwritten signature dated August 8, 2014, respectively;

- i. On or about August 13, 2014, filing documents entitled "Chapter 7 Voluntary Petition..." and "Declaration Re: Electronic Filing" on behalf of respondent's client, Anna Jennings, in case no. 14-06465-LT7, which bear respondent's electronic signature dated August 13, 2014 and respondent's handwritten signature dated July 2, 2014, respectively;
- j. On or about August 13, 2014, filing a document entitled "OPPOSITION TO JUDGMENT ON MOTION FOR RELIEF FOR LACK OF PROPER SERVICE ON DEBTORS" on behalf of respondent's clients, Karen and Daren Daganasol, in case no. 14-03293-LA13, which bears respondent's electronic signature dated August 13, 2014;
- k. On or about August 13, 2014, filing a document entitled "Reaffirmation Agreement Between Debtor and Wells Fargo" on behalf of respondent's clients, Danielle and Ulysses Dickerson, in case no. 14-02997-LT7, which bears respondent's handwritten signature dated July 14, 2014;
- l. On or about August 18, 2014, filing documents entitled "Chapter 13 Voluntary Petition..." and "Declaration Re: Electronic Filing" on behalf of respondent's client, Sheila Cohen, in case no. 14-06589-LT13, which bear respondent's electronic signature dated August 18, 2014 and respondent's handwritten signature dated August 18, 2014, respectively; and
- m. On or about August 19, 2014, filing a document entitled "STATUS REPORT ON OPPOSITION TO TRUSTEE'S OBJECTION TO CONFIRMATION" on behalf of respondent's client, Brian Pigott, in case no. 14-01965-LT13, which bears respondent's electronic signature dated August 19, 2014.

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COUNT EIGHT

Case No. 14-O-04786
Business and Professions Code Section 6106
[Moral Turpitude]

12. From on or about September 8, 2014 through on or about November 5, 2014, respondent made the following misrepresentations to the State Bar during the course of its disciplinary investigation of this matter, and thereby committed acts involving moral turpitude, dishonesty, or corruption in willful violation of Business and Professions Code section 6106:

- a. On or about September 8, 2014, respondent sent a letter to the State Bar indicating that respondent had not made any court appearances since July 9, 2014, when respondent knew, or was grossly negligent in not knowing, that respondent had appeared at a meeting of creditors in the United States Bankruptcy Court for the Southern District of California on July 22, 2014 on behalf of respondent's client, Julio Felix, in case no. 14-04882-MM7;
- b. On or about September 8, 2014, respondent sent a letter to the State Bar indicating that respondent had not made any court appearances since July 9, 2014, when respondent knew, or was grossly negligent in not knowing, that respondent had appeared at a meeting of creditors in the United States Bankruptcy Court for the Southern District of California on July 23, 2014 on behalf of respondent's client, William Nordquist, in case no. 14-04212-CL7; and
- c. On or about November 5, 2014, respondent sent a letter to the State Bar indicating that respondent had not filed any documents with a court between August 19, 2014 and October 7, 2014, when respondent knew, or was grossly negligent in not knowing, that on August 22, 2014 respondent filed a document entitled "Amendment to Schedule A & B – Schedule of Real or Personal Property..." with the United States Bankruptcy Court for the Southern District of California on behalf of respondent's client, William Nordquist, in case no. 14-04212-CL7.

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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: May 19, 2015

By: 
Shane C. Morrison
Deputy Trial Counsel