

PUBLIC MATTER

FILED

1 STATE BAR OF CALIFORNIA
2 OFFICE OF THE CHIEF TRIAL COUNSEL
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SEP 29 2014
STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

10 STATE BAR COURT
11 HEARING DEPARTMENT - LOS ANGELES

13 In the Matter of:) Case Nos. 14-O-00251
14 GREGORY LYLE JACKSON,) 14-O-00409
15 No. 212265,) 14-O-00769
16) 14-O-01112
17) NOTICE OF DISCIPLINARY CHARGES
18 A Member of the State Bar

18 **NOTICE - FAILURE TO RESPOND!**

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

- 22 (1) **YOUR DEFAULT WILL BE ENTERED;**
- 23 (2) **YOUR STATUS WILL BE CHANGED TO INACTIVE AND YOU**
24 **WILL NOT BE PERMITTED TO PRACTICE LAW;**
- 25 (3) **YOU WILL NOT BE PERMITTED TO PARTICIPATE FURTHER**
26 **IN THESE PROCEEDINGS UNLESS YOU MAKE A TIMELY**
27 **MOTION AND THE DEFAULT IS SET ASIDE, AND;**
- 28 (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.



1 The State Bar of California alleges:

2 JURISDICTION

3 1. Respondent Gregory Lyle Jackson was admitted to the practice of law in the State
4 of California on January 11, 2001, was a member at all times pertinent to these charges, and
5 is currently a member of the State Bar of California.

6 COUNT ONE

7 Case No. 14-O-00251

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

10 2. On or about June 19, 2013, Lisa Rollans employed Respondent to perform legal
11 services, namely to represent her in a legal action to enforce the monetary provisions of the
12 dissolution judgment filed in Kern County Superior Court, case no. S-1501-FL-606240, in
13 which Respondent intentionally, recklessly, or repeatedly failed to perform with competence,
14 in wilful violation of Rules of Professional Conduct, rule 3-110(A), by the following:

- 15 a. Submitting for filing on August 19, 2013 a deficient pleading re contempt
16 which was not in the proper format, which the court rejected for filing;
- 17 b. Filing on September 30, 2013 another pleading re contempt which was
18 defective since it improperly sought family support, when Respondent knew
19 that Rollans was seeking payments for equalization, and there were no legal
20 grounds to seek contempt, and which was also defective since it contained
21 incorrect information in the supporting declaration; and
- 22 c. Filing on November 19, 2013 a third pleading re contempt which was still
23 defective since it improperly sought family support, when Respondent knew
24 that Rollans was seeking payments for equalization.

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COUNT TWO

Case No. 14-O-00251
Business and Professions Code section 6068(m)
[Failure to Respond to Reasonable Client Inquiries]

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

COUNT THREE

Case No. 14-O-00251
Rules of Professional Conduct, rule 4-100(B)(3)
[Failure to Render Accounts of Client Funds]

4. On or about June 19, 2013, Respondent received from Respondent's client, Lisa Rollans, the sum of \$7,500 as advanced fees for legal services to be performed. Respondent thereafter failed to render an appropriate accounting to the client regarding those funds following the client's termination of Respondent on or about November 26, 2013, and request for a refund of the unearned portion of the advanced attorney fees in wilful violation of Rules of Professional Conduct, rule 4-100(B)(3).

COUNT FOUR

Case No. 14-O-00251
Rules of Professional Conduct, rule 3-700(D)(1)
[Failure to Release File]

5. Respondent failed to release promptly, after termination of Respondent's employment on or about November 26, 2013, to Respondent's client, Lisa Rollans, all of the client's papers and property following the client's request for the client's file on November 26, 2013, in wilful violation of Rules of Professional Conduct, rule 3-700(D)(1).

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COUNT FIVE

Case No. 14-O-00251
Rules of Professional Conduct, rule 3-700(D)(2)
[Failure to Refund Unearned Advanced Attorney Fees]

6. On or about June 19, 2013, Respondent received advanced fees of \$7,500 from a client, Lisa Rollans, which were paid to perform legal services, namely to represent Rollans in a legal action to enforce the monetary provisions of the dissolution judgment filed in Kern County Superior Court, case no. S-1501-FL-606240. Respondent performed no services of value on behalf of the client and therefore earned none of the advanced fees paid. Respondent failed to refund promptly, upon Respondent's termination of employment in or about November 2013 any part of the \$7,500 fee, in willful violation of Rules of Professional Conduct, rule 3-700(D)(2).

COUNT SIX

Case No. 14-O-00409
Rules of Professional Conduct, rule 3-110(A)
[Failure to Perform with Competence]

7. On or about October 19, 2013, Timothy Ziegler employed Respondent to perform legal services, namely to represent him in three cases pending simultaneously in Los Angeles Superior Court: a criminal case involving battery charges in case no. 3CA15232; a criminal case involving gun charges in case no. Z314564; and a civil restraining order case entitled *Olson v. Ziegler*, case no. PS015767. In each of the three cases, Respondent intentionally, recklessly, or repeatedly failed to perform with competence, in wilful violation of Rules of Professional Conduct, rule 3-110(A), by the following:

- a. Failing to appear at the December 9, 2013 office meeting with the District Attorney's Office, and thereafter providing no legal services of value to Ziegler in case no. Z314564, the battery matter;
- b. Failing to appear at the December 13, 2013 hearing in the civil restraining order matter (case no. PS015767), failing to send an attorney who had the file or any knowledge of the case to the December 13, 2013 hearing, and

1 thereafter providing no legal services of value to Ziegler in the civil
2 restraining order matter; and

- 3 c. Failing to appear at the January 24, 2014 hearing in the gun charges matter
4 (case no. 3CA15232), failing to send an attorney who had the file or any
5 knowledge of the case to the January 24, 2014 hearing, and thereafter
6 providing no legal services of value to Ziegler in the gun charges matter.

7 COUNT SEVEN

8 Case No. 14-O-00409
9 Business and Professions Code section 6068(m)
[Failure to Respond to Reasonable Client Inquiries]

10 8. Respondent failed to respond promptly to multiple telephonic reasonable status
11 inquiries made by Respondent's client, Timothy Ziegler, in the time period from October
12 2013 until January 2014, that Respondent received in a matter in which Respondent had
13 agreed to provide legal services, in wilful violation of Business and Professions Code section
14 6068(m).

15 COUNT EIGHT

16 Case No. 14-O-00409
17 Rules of Professional Conduct, rule 4-100(B)(3)
[Failure to Render Accounts of Client Funds]

18 9. On or about October 19, 2013, Respondent received from Respondent's client,
19 Timothy Ziegler, the sum of \$10,000 as advanced fees for legal services to be performed.
20 Respondent thereafter failed to render an appropriate accounting to the client regarding those
21 funds following the client's termination of Respondent in late January 2014, and request for a
22 refund of the unearned portion of the advanced attorney fees in wilful violation of Rules of
23 Professional Conduct, rule 4-100(B)(3).

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- 1 c. Failing to appear at the August 26, 2013 and December 11, 2013 hearings in
2 Hubert's dissolution matter and sending an appearance attorney who had no
3 knowledge of the case, and was otherwise unprepared to the two hearings, and
4 d. Failing to personally appear at the January 6, 2014 hearing as ordered by the
5 court, and thereafter providing no legal services of value to Hubert in his
6 dissolution proceeding.

7 COUNT ELEVEN

8 Case No. 14-O-00769
9 Business and Professions Code section 6103
[Failure to Obey a Court Order]

10 12. Respondent disobeyed or violated an order of the court requiring Respondent to
11 do or forbear an act connected with or in the course of Respondent's profession which
12 Respondent ought in good faith to do or forbear by failing to comply with December 11,
13 2013 order requiring Respondent to provide an original medical note to the court and the
14 January 6, 2014 sanctions order requiring him to pay \$1,000 in the Hubert dissolution matter
15 in San Diego Superior Court, case no. ED86941 entitled *In the Matter of Hubert* in wilful
16 violation of Business and Professions Code section 6103.

17 COUNT TWELVE

18 Case No. 14-O-00769
19 Business and Professions Code section 6068(o)(3)
[Failure to Report Judicial Sanctions]

20 13. Respondent failed to report to the agency charged with attorney discipline, in
21 writing, within 30 days of the time Respondent had knowledge of the imposition of any
22 judicial sanctions against Respondent by failing to report to the State Bar the January 6, 2014
23 sanctions order in the Hubert dissolution matter in San Diego Superior Court, case no.
24 ED86941 entitled *In the Matter of Hubert*, which imposed \$1,000 in sanctions on
25 Respondent, in wilful violation of Business and Professions Code section 6068(o)(3).

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1 COUNT THIRTEEN

2 Case No. 14-O-01112
3 Business and Professions Code section 6068(i)
4 [Failure to Respond to State Bar Investigation]

5 14. Respondent failed to cooperate and participate in a disciplinary investigation
6 pending against Respondent by failing to provide a substantive response to the State Bar's
7 letters of March 27, 2014 and August 20, 2014, which Respondent received, that requested
8 Respondent's response to the allegations of misconduct being investigated in State Bar Case
9 No. 14-O-1112, in wilful violation of Business and Professions Code section 6068(i).

10 NOTICE - INACTIVE ENROLLMENT!

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

20 NOTICE - COST ASSESSMENT!

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

26 Respectfully submitted,

27 THE STATE BAR OF CALIFORNIA
28 OFFICE OF THE CHIEF TRIAL COUNSEL

29 DATED: September 29, 2014

By: 

Erin McKeown Joyce
SENIOR TRIAL COUNSEL

DECLARATION OF SERVICE

by

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

CASE NUMBER(s): 14-O-00251, 14-O-00409, 14-O-00769, 14-O-01112

I, the undersigned, am over the age of eighteen (18) years and not a party to the within action, whose business address and place of employment is the State Bar of California, 1149 South Hill Street, Los Angeles, California 90015, declare that:

- on the date shown below, I caused to be served a true copy of the within document described as follows:

NOTICE OF DISCIPLINARY CHARGES

By U.S. First-Class Mail: (CCP §§ 1013 and 1013(a)) **By U.S. Certified Mail: (CCP §§ 1013 and 1013(a))**
 - in accordance with the practice of the State Bar of California for collection and processing of mail, I deposited or placed for collection and mailing in the City and County of Los Angeles.

By Overnight Delivery: (CCP §§ 1013(c) and 1013(d))
 - I am readily familiar with the State Bar of California's practice for collection and processing of correspondence for overnight delivery by the United Parcel Service ("UPS").

By Fax Transmission: (CCP §§ 1013(e) and 1013(f))
 Based on agreement of the parties to accept service by fax transmission, I faxed the documents to the persons at the fax numbers listed herein below. No error was reported by the fax machine that I used. The original record of the fax transmission is retained on file and available upon request.

By Electronic Service: (CCP § 1010.6)
 Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the person(s) at the electronic addresses listed herein below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

(for U.S. First-Class Mail) in a sealed envelope placed for collection and mailing at Los Angeles, addressed to: (see below)

(for Certified Mail) in a sealed envelope placed for collection and mailing as certified mail, return receipt requested,
 Article No.: 9414726699042010091271 at Los Angeles, addressed to: (see below)

(for Overnight Delivery) together with a copy of this declaration, in an envelope, or package designated by UPS,
 Tracking No.: _____ addressed to: (see below)

Person Served via U.S. mail	Business-Residential Address	Fax Number	Courtesy Copy via First Class Mail::					
Gregory L. Jackson	Law Office of Gregory L. Jackson 1400 Chester Ave Ste K Bakersfield, CA 93301	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: center;">Electronic Address</th> </tr> <tr> <td style="padding: 2px;">margolis41@la.twcbc.com</td> </tr> <tr> <td style="padding: 2px;">GLJackson@A1LegalService sAndMediationCenters.com</td> </tr> <tr> <td style="padding: 2px;">SKD@A1LegalServicesAnd MediationCenters.com</td> </tr> <tr> <td style="padding: 2px;">gregjacksonlaw@juno.com</td> </tr> </table>	Electronic Address	margolis41@la.twcbc.com	GLJackson@A1LegalService sAndMediationCenters.com	SKD@A1LegalServicesAnd MediationCenters.com	gregjacksonlaw@juno.com	Arthur Lewis Margolis Margolis & Margolis LLP 2000 Riverside Drive Los Angeles, CA 90039
Electronic Address								
margolis41@la.twcbc.com								
GLJackson@A1LegalService sAndMediationCenters.com								
SKD@A1LegalServicesAnd MediationCenters.com								
gregjacksonlaw@juno.com								

via inter-office mail regularly processed and maintained by the State Bar of California addressed to:

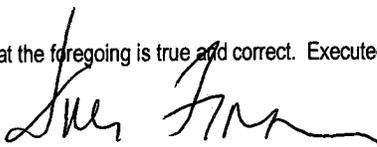
N/A

I am readily familiar with the State Bar of California's practice for collection and processing of correspondence for mailing with the United States Postal Service, and overnight delivery by the United Parcel Service ("UPS"). In the ordinary course of the State Bar of California's practice, correspondence collected and processed by the State Bar of California would be deposited with the United States Postal Service that same day, and for overnight delivery, deposited with delivery fees paid or provided for, with UPS that same day.

I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date on the envelope or package is more than one day after date of deposit for mailing contained in the affidavit.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed at Los Angeles, California, on the date shown below.

DATED: September 29, 2014

SIGNED: 

JULI FINNILA
 Declarant