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MAR 21 2016

STATE BAR COURT
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6 Attorneys for Member
Jamaul Cannon

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8 **STATE BAR COURT**
HEARING DEPARTMENT - LOS ANGELES

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10 State Bar of California,
11
12 **Petitioner,**
13 vs.
14 Jamaul Cannon,
15
16 **Respondent.**

CASE NO. 14-O-00863 AND 14-O-04538

**MEMBER JAMAUL CANNON'S
VERIFIED RESPONSE TO THE
STATE BAR'S NOTICE OF
DISCIPLINARY CHARGES**

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MEMBER RESPONSE TO NDC

(Case No. 15-O-10433 AND 15-O-10808)

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1 State Bar Member Jamaul D. Cannon (“Member”) hereby submits the following response
2 to the State Bar of California’s (State Bar’s) Notice of Disciplinary Charges (the “NDC”) in the
3 above-entitled action as follows:

4 **JURISDICTION**

5 1. Member admits Paragraph 1 of the NDC.

6 **COUNT ONE**

7 2. Member denies Paragraph 2 of the NDC. The Member did not directly transmit any
8 of the aforementioned documents to Peachtree, though he believes his former partner William
9 Watkins (“Watkins”) and/or one of his agents did.

10 **COUNT TWO**

11 3. Member specifically denies Paragraph 3 of the NDC. For the reasons stated in
12 Paragraph 2, Member did not in fact seek an advance from Peachtree.

13 **COUNT THREE**

14 4. Member specifically denies Paragraph 4 of the NDC. Member requested that
15 Watkins, a cosignor on Member’s trust account, provide copies of bank records while he worked
16 on his response to the State Bar’s investigation. Because Member did not view or cross-reference
17 copies of the aforementioned records, he has no idea whether they were “falsified” or not; he can
18 affirmatively state that *he* did not falsify anything.

19 **COUNT FOUR**

20 5. Member specifically denies Paragraph 5 of the NDC. Member requested that
21 Watkins, a cosignor on Member’s trust account, provide copies of bank records while he worked
22 on his response to the State Bar’s investigation. Because Member did not view or cross-reference
23 copies of the aforementioned records, he has no idea whether they were “falsified” or not; he can
24 affirmatively state that *he* did not falsify anything.

25 **COUNT FIVE**

26 6. Member specifically denies Paragraph 6 of the NDC. Member’s trust account with
27 Chase was cancelled in 2013 because Member had switched to banking with Wells Fargo. As
28 such, there was no way Respondent, or anyone else for that matter, could have deposited funds

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1 into his Chase trust account.

2 **COUNT SIX**

3 7. Member specifically denies Paragraph 7 of the NDC. Member received multiple
4 extensions to respond to discovery, because Member spent the early stages of Bowers'
5 representation focused on dealing with child custody issues due to her son's severe psychotic
6 behavior. It should be noted, Member propounded discovery before Sibbison, and Member
7 continuously provided him with discovery extensions as well. Nevertheless, in seeking the
8 foregoing extensions, Sibbison failed to request an extension in time to file a motion to compel
9 based on Member providing tardy responses. As a result, Sibbison *could not* file a timely motion
10 to compel once Member provided *any* responses. Thus, when Sibbison continuously complained
11 about Member's "insufficient" responses to his discovery, Member was within his right to refuse
12 to provide further responses, a fact Member communicated to Bowers. The foregoing was why
13 Member warranted he would pay any sanctions following a motion to compel if he was permitted
14 to argue it. Bowers, however, never gave Member the opportunity to contest the motion; as a
15 result, she willingly paid sanctions, and Member did not and never did warrant he would blindly
16 pay sanctions that were unnecessary.

17 8. Member notes there appear to be two "Count Sixes", the second of which appears
18 to be related to purportedly unearned fees. Member specifically denies Paragraph 8 of the
19 Complaint. Member specifically told Bowers to ease her concerns that he would spend all
20 weekend drafting a response to Sibbison's motion to compel and he would illustrate how Sibbison
21 could not possibly prevail. Bowers *agreed* to review Member's work, however she terminated his
22 services the following Monday. Had Bowers simply told Member to cease work (even if she had
23 not yet determined she wanted to terminate his services) Bowers would have not incurred any
24 additional fees. Instead, her clandestine activity caused Member to needlessly work on an
25 opposition to a motion Bowers ostensibly had no intention of fighting.

26 **COUNT SEVEN**

27 9. Member specifically denies Paragraph 9 of the NDC. Member could not have even
28 drafted discovery responses without input from Bowers; it is uncontroverted that Member provided

1 discovery responses to Sibbison. Member obviously discussed the discovery with Bowers. When
2 Member initially mentioned the discovery to Bowers, barely a few days after receiving said
3 discovery requests, Bowers told Member to focus on trying to get her son institutionalized after he
4 ripped a television off the wall at her house and threw it at her head. As a result, Member focused
5 on custody issues related to Bowers' son while simultaneously getting an extension to respond to
6 Sibbison's discovery.

7 10. Member specifically denies Paragraph 10 of the NDC. Member specifically told
8 Bowers to ease her concerns that he would spend all weekend drafting a response to Sibbison's
9 motion to compel and he would illustrate how Sibbison could not possibly prevail. Bowers *agreed*
10 to review Member's work, however she terminated his services the following Monday. Had
11 Bowers simply told Member to cease work (even if she had not yet determined she wanted to
12 terminate his services) Bowers would have not incurred any additional fees. Instead, her
13 clandestine activity caused Member to needlessly work on an opposition to a motion Bowers
14 ostensibly had no intention of fighting. Thus, Member did not make any false statements
15 regarding the work he performed.

16 11. Member specifically denies Paragraph 11 of the NDC. Motions to compel routinely
17 take 6-10 hours to defend. Thus incurring 7 hours of time drafting a response, was not
18 unconscionable. It should be noted, Sibbison requested over \$3,000 in sanctions for *bringing* the
19 motion, so the State Bar cannot possibly claim that for Bowers to incur slightly over \$2,000 in fees
20 to oppose said motion is unconscionable.

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VERIFICATION

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on March 13, 2016 at Pasadena, California.



By: _____
Jamaul Cannon

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am over the age of 18 and a party to the within action; I am employed by **CANNON LEGAL GROUP, A.P.C.** in the County of Los Angeles at 221 E. Walnut Street, Suite 260, Pasadena, California 91101.

On March 21, 2016, I served the foregoing document(s) described as

Jamaul Cannon's Respose to Notice of Disciplinary Charges

by sending true copies electronically to the attached mailing list

Kimberly G. Anderson | Senior Trial Counsel
kimberly.anderson@calbar.ca.gov

(BY MAIL) I placed said envelope(s) for collection and mailing, following ordinary business practices, at the business offices of CANNON LEGAL GROUP, A.P.C., and addressed as shown on the attached service list, for deposit in the United States Postal Service. I am readily familiar with the practice of CANNON LEGAL GROUP, A.P.C. for collection and processing correspondence for mailing with the United States Postal Service, and said envelope(s) will be deposited with the United States Postal Service on said date in the ordinary course of business.

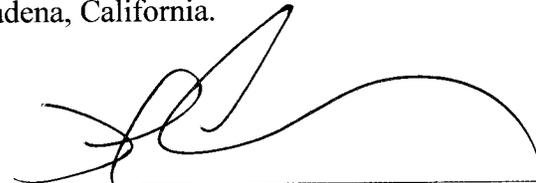
(BY OVERNIGHT DELIVERY) I placed said documents in envelope(s) for collection following ordinary business practices, at the business offices of CANNON LEGAL GROUP, A.P.C. and addressed as shown on the attached service list, for collection and delivery to a courier authorized by [Addressee_First] [Addressee_Last] to receive said documents, with delivery fees provided for.

(BY ELECTRONIC MAIL) I caused the above-referenced document to be transmitted to the interested parties via electronic mail to the fax number(s) as stated on the attached service list.

(BY PERSONAL SERVICE) I delivered such envelope(s) by hand to the offices of the addressee(s).

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

Executed on March 21, 2016 at Pasadena, California.



Jamaul D. Cannon, Esq.