

PUBLIC MATTER

STATE BAR OF CALIFORNIA  
OFFICE OF THE CHIEF TRIAL COUNSEL  
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FILED

DEC 09 2014

STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

STATE BAR COURT

HEARING DEPARTMENT - LOS ANGELES

In the Matter of:

Case Nos. 14-O-03054; 14-O-03055;  
14-O-03268

RAAQIM A.S. KNIGHT,  
No. 217630,

NOTICE OF DISCIPLINARY CHARGES

A Member of the State Bar

**NOTICE - FAILURE TO RESPOND!**

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

- (1) YOUR DEFAULT WILL BE ENTERED;**
- (2) YOUR STATUS WILL BE CHANGED TO INACTIVE AND YOU WILL NOT BE PERMITTED TO PRACTICE LAW;**
- (3) YOU WILL NOT BE PERMITTED TO PARTICIPATE FURTHER IN THESE PROCEEDINGS UNLESS YOU MAKE A TIMELY MOTION AND THE DEFAULT IS SET ASIDE, AND;**
- (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:  
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3 JURISDICTION

4 1. Raaqim Knight (“respondent”) was admitted to the practice of law in the State of  
5 California on December 3, 2001, was a member at all times pertinent to these charges, and is  
6 currently a member of the State Bar of California.  
7

8 COUNT ONE

9 Case No. 14-O-03054  
10 Rules of Professional Conduct, rule 3-110(A)  
[Failure to Perform with Competence]

11 2. On or about August 27, 2011, Michelle Moss and Mary Gilbert hired Respondent to  
12 perform legal services, namely to file and prosecute a wrongful death lawsuit, which Respondent  
13 intentionally, recklessly, or repeatedly failed to perform with competence, in willful violation of  
14 Rules of Professional Conduct, rule 3-110(A), by:

- 15 a. Failing to comply with the Federal Court’s pretrial requirements for the trial  
16 set for February 11, 2014, in *Moss et. al. v. City of Los Angeles et. al.*, a  
Federal District Court case under No. 2:13-CV-09126;  
17  
18 b. Failing to move for a continuance by January 28, 2014, as ordered by the  
Federal Court in case number 2:13-CV-09126;  
19  
20 c. Failing to prosecute the cases under Federal District Case Nos. 2:11-CV-  
09098 and 2:13-CV-01926, both styled *Moss et. a. v. City of Los Angeles et. al.*, causing the cases to be dismissed with prejudice; and  
21  
22 d. Failing to oppose the defendant’s October 21, 2013 motion to dismiss the  
client’s case in Federal Court Case No. 2:13-CV-09126.

23 COUNT TWO

24 Case No. 14-O-03054  
25 Rules of Professional Conduct, rule 3-700(A)(1)  
26 [Failure to Obtain Court Permission to withdraw]

27 3. On or about August 27, 2011, Michelle Moss and Mary Gilbert employed  
28 Respondent to perform legal services, and thereafter, Respondent appeared as counsel of record

1 for the client in in their wrongful death case in Federal District Court, *Moss et al. v. City of Los*  
2 *Angeles et. al.*, Case No. 2:13-CV-01926. On or about January 27, 2014, Respondent took no  
3 further action on behalf of the clients after appearing at the pre-trial conference, and effectively  
4 withdrew from the employment. At that time, Respondent did not obtain the permission of the  
5 court to withdraw from the client's representation in the case before that court when the rules of  
6 the court required that he do so, and Respondent withdrew from employment in a proceeding  
7 before a tribunal without its permission, in willful violation of the Rules of Professional Conduct,  
8 rule 3-700(A)(1).

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10 COUNT THREE

11 Case No. 14-O-03054  
12 Rules of Professional Conduct, rule 3-700(D)(1)  
13 [Failure to Release File]

14 4. Respondent failed to promptly release, after the termination of Respondent's  
15 employment on or about January 27, 2014, to Respondent's clients, Michelle Moss and Mary  
16 Gilbert, all of the clients' papers and property following the clients' repeated requests for the  
17 clients' file in or about April 2014, in willful violation of Rules of Professional Conduct, rule 3-  
18 700(D)(1).

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20 COUNT FOUR

21 Case No. 14-O-03055  
22 Business and Professions Code, section 6068(m)  
23 [Failure to Communicate with Client]

24 5. Respondent failed to communicate with his client, Ksenia Deshchekina, by not  
25 responding to eight written, reasonable requests for information, which respondent received,  
26 regarding her case between on or about November 22, 2013 and May 5, 2014, in willful violation  
27 of Business and Professions Code, section 6068(m).  
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COUNT FIVE

Case No. 14-O-03055  
Rules of Professional Conduct, rule 3-110(A)  
[Failure to Perform with Competence]

6. On or about November 26, 2012, Ksenia Deshchekina employed Respondent to perform legal services, namely to file and prosecute a lawsuit for trademark infringement and violations of her rights to publicity and privacy in the California Superior Court, styled *Ksenia Deshchekina v. Michael Weintraub et. al.*, Case No. SC120546, which Respondent intentionally, recklessly, or repeatedly failed to perform with competence, in willful violation of Rules of Professional Conduct, rule 3-110(A), by:

- a. Failing to respond to discovery requests for interrogatories, served on January 27, 2014, demands for production, served on January 27, 2014, and requests for admissions, served on January 28, 2014;
- b. Failing to respond to the defendant's motion to compel, filed March 21, 2014; and
- c. Failing to oppose the defendant's motion for sanctions, filed March 21, 2014.

COUNT SIX

Case No. 14-O-03055  
Rules of Professional Conduct, rule 3-700(A)(1)  
[Failure to Obtain Court Permission to withdraw]

7. On or about November 26, 2012, Ksenia Deshchekina employed Respondent to perform legal services, and thereafter, Respondent appeared as counsel of record for the client in her civil action in California Superior Court, *Ksenia Deshchekina v. Michael Weintraub et. al.*, Case No. SC120546. In or about November 2013, Respondent took no further action on behalf of the client after filing the complaint to protect her publicity and privacy rights, and effectively withdrew from the employment. At that time, Respondent did not obtain the permission of the court to withdraw from the client's representation in the case before that court when the rules of the court required that he do so, and Respondent withdrew from employment in a proceeding

1 before a tribunal without its permission, in willful violation of the Rules of Professional Conduct,  
2 rule 3-700(A)(1).

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4 COUNT SEVEN

5 Case No. 14-O-03055  
6 Rules of Professional Conduct, rule 3-700(D)(1)  
7 [Failure to Release File]

8 8. Respondent failed to promptly release to his client, Ksenia Deshchekina, after  
9 termination of Respondent's employment on or about April 24, 2014, all of the client's papers  
10 and property at the time of termination and again following the client's request for the client's  
11 file on May 19, 2014, in willful violation of Rules of Professional Conduct, rule 3-700(D)(1).

12 COUNT EIGHT

13 Case No. 14-O-03268  
14 Rules of Professional Conduct, rule 3-110(A)  
15 [Failure to Perform with Competence]

16 9. On or about May 31, 2013, Todd and Carisse DeStefano employed Respondent to  
17 perform legal services, namely to defend the clients against a lawsuit in the California Superior  
18 Court, styled *Los Angeles Memorial Coliseum Commission et. al. v. Patrick Thomas Lynch et.*  
19 *al.*, Case No. BC472814, which Respondent intentionally, recklessly, or repeatedly failed to  
20 perform with competence, in willful violation of Rules of Professional Conduct, rule 3-110(A),  
21 by:

- 22 a. Failing to oppose the plaintiff's motion to compel the deposition of Ms.  
23 DeStefano, filed on January 31, 2014; and  
24 b. Failing to oppose the plaintiff's motion for sanctions, filed January 31, 2014.

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COUNT NINE

Case No. 14-O-03326  
Rules of Professional Conduct, rule 3-700(A)(1)  
[Failure to Obtain Court Permission to withdraw]

10. On or about May 31, 2013, Todd and Carisse DeStefano employed Respondent to perform legal services, and thereafter, Respondent appeared as counsel of record for the client in their civil action in the California Superior Court, *Los Angeles Memorial Coliseum Commission et. al. v. Patrick Thomas Lynch et. al.*, Case No. BC472814. After in or about January 2014, Respondent took no further action on behalf of the client in this civil action, and effectively withdrew from the employment. At that time, Respondent did not obtain the permission of the court to withdraw from the client's representation in the case before that court when the rules of the court required that he do so, and Respondent withdrew from employment in a proceeding before a tribunal without its permission, in willful violation of the Rules of Professional Conduct, rule 3-700(A)(1).

COUNT TEN

Case No. 14-O-03268  
Rules of Professional Conduct, rule 3-700(D)(1)  
[Failure to Release File]

11. Respondent failed to promptly release, after termination of Respondent's employment on or about January 31, 2014, to Respondent's clients, Todd and Carisse DeStefano, all of the clients' papers and property upon termination of his representation and again following the clients' repeated requests for the clients' file on or about March 21, 2014, in willful violation of Rules of Professional Conduct, rule 3-700(D)(1).

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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.**

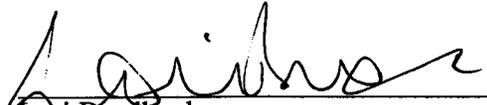
**NOTICE - COST ASSESSMENT!**

**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 December 8, 2014

By:   
Lori Brodbeck

DECLARATION OF SERVICE

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

CASE NUMBER(s): 14-O-03054; 14-O-03055; 14-O-03268

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, 845 South Figueroa Street, Los Angeles, California 90017, 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. COURTESY COPY ONLY
SERVICE COPY ONLY

- 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.: 9414 7266 9904 2010 0877 17 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)

Table with 4 columns: Person Served, Business-Residential Address, Fax Number, Courtesy Copy to. Row 1: Raaqim A.S. Knight, Knight Law Group, 6060 W Manchester Ave Ste 310, Los Angeles, CA 90045, Electronic Address, 11327 Albata Street, Los Angeles, CA 90049-3401

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

NIA

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: December 9, 2014

SIGNED: Charles C. Bagai
Charles C. Bagai
Declarant