

PUBLIC MATTER

1 STATE BAR OF CALIFORNIA
2 OFFICE OF THE CHIEF TRIAL COUNSEL
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FILED
FEB 04 2015
STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

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9 STATE BAR COURT
10 HEARING DEPARTMENT - LOS ANGELES

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12 In the Matter of:) Case No. 14-O-03291
13 JACOB DONG CHANG,)
14 No. 174476,) NOTICE OF DISCIPLINARY CHARGES
15 A Member of the State Bar.)

16 **NOTICE - FAILURE TO RESPOND!**

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

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

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1 The State Bar of California alleges:

2 JURISDICTION

3 1. Jacob Dong Chang ("Respondent") was admitted to the practice of law in the State
4 of California on December 12, 1994, was a member at all times pertinent to these charges, and is
5 currently a member of the State Bar of California.

6 COUNT ONE

7 Case No. 14-O-03291
8 Rules of Professional Conduct, rule 4-100(A)
[Failure to Deposit Client Funds in Trust Account]

9 2. On or about August 12, 2013, Respondent received on behalf of Respondent's
10 clients, Ignacio and Beatriz Paredes, a settlement check from Inter Insurance Exchange of the
11 Automobile Club made payable to Respondent and clients in the sum of \$4,515.05. Respondent
12 failed to deposit \$4,515.05 in funds received for the benefit of the client in a bank account
13 labeled "Trust Account," "Client's Funds Account" or words of similar import, prior to
14 distribution, in wilful violation Rules of Professional Conduct, rule 4-100(A).

15 COUNT TWO

16 Case No. 14-O-03291
17 Business and Professions Code, section 6103
[Failure to Obey a Court Order]

18 3. Respondent disobeyed or violated an order of the court requiring Respondent to do
19 or forbear an act connected with or in the course of Respondent's profession which Respondent
20 ought in good faith to have done by failing to comply with the July 10, 2014, order to produce
21 statement of assets and to appear for examination in *Paredes v. Jacob D. Chang*, filed in the
22 Superior Court of North District, Antelope Valley Courthouse, Case No. 14SA0078, by failing to
23 either pay the judgment secured by Paredes and file proof of payment or to personally appear and
24 participate within a debtor's examination conducted August 4, 2014, in willful violation of
25 Business and Professions Code, section 6103.

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COUNT THREE

Case No. 14-O-03291
Business and Professions Code, section 6106
[Moral Turpitude – Issuance of NSF Checks]

4. On or about March 17, 2014, Respondent issued the following check drawn upon Respondent’s Hanin Federal Credit Union account, account no. xxxxx-1055, when Respondent knew, or was grossly negligent in not knowing, that there were insufficient funds in the account to pay it, and thereby committed an act involving moral turpitude, dishonesty or corruption in willful violation of Business and Professions Code, section 6106:

<u>Check No.</u>	<u>Check Date</u>	<u>Check Amt.</u>	<u>Returned</u>
3555	March 17, 2014	\$3,724	NSF

COUNT FOUR

Case No. 14-O-03291
Business and Professions Code, section 6068(i)
[Failure to Cooperate in State Bar Investigation]

5. Respondent failed to cooperate and participate in a disciplinary investigation pending against Respondent by failing to provide a substantive response to the State Bar’s letters of October 23, 2014, and November 10, 2014, which Respondent received, that requested Respondent’s response to the allegations of misconduct being investigated in case no. 14-O-03291, in willful violation of Business and Professions Code, section 6068(i).

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.

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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: February 4, 2015

By: 
Hugh G. Radigan
Deputy 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-03291

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))
By Overnight Delivery: (CCP §§ 1013(c) and 1013(d))
By Fax Transmission: (CCP §§ 1013(e) and 1013(f))
By Electronic Service: (CCP § 1010.6)

- (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.: 7196 9008 9111 1008 4821 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: JACOB DONG CHANG, 312 N. Avon St. Burbank, CA 91505, Electronic Address.

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).

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: February 4, 2015

SIGNED: Sandra Reynolds (signature) Sandra Reynolds Declarant