

PUBLIC MATTER

1 STATE BAR OF CALIFORNIA
OFFICE OF THE CHIEF TRIAL COUNSEL
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FILED

JUL 08 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 Nos. 14-O-04902, 14-O-05466,
13 ANGELA ELIZABETH MUELLER,) 14-O-05615, 15-O-10032 and 15-O-10087
No. 266929,)
14) NOTICE OF DISCIPLINARY CHARGES
15 A Member of the State Bar.)
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17 **NOTICE - FAILURE TO RESPOND!**

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

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

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The State Bar of California alleges:

JURISDICTION

1. Angela Elizabeth Mueller (“Respondent”) was admitted to the practice of law in the State of California on December 4, 2009, 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-O-04902
Rules of Professional Conduct, Rule 1-300(B)
[Unauthorized Practice of Law in Other Jurisdiction]

2. From on or about November 26, 2013 through on or about September 11, 2014, Respondent practiced law in New Jersey by agreeing to perform legal services in the form of a loan modification on behalf of Cheryl Rayner and Robert Wilson in connection with their property in New Jersey, when to do so was in violation of the regulations of the profession in New Jersey, namely New Jersey Rules of Professional Conduct, rule 5.5, in willful violation of the Rules of Professional Conduct, rule 1-300(B).

COUNT TWO

Case No. 14-O-04902
Rules of Professional Conduct, Rule 1-300(A)
[Aiding the Unauthorized Practice of Law]

3. From on or about November 26, 2013 through on or about September 11, 2014, Respondent aided Office manager/administrator, Mike Nejad and his staff, who are not licensed to practice law in either New Jersey or California, in the unauthorized practice of law, by knowingly allowing Nejad and his staff to provide legal advice to Cheryl Rayner and Robert Wilson related to loan modification services, in willful violation of Rules of Professional Conduct, rule 1-300(A).

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COUNT THREE

Case No. 14-O-04902
Rules of Professional Conduct, rule 4-200(A)
[Illegal Fee]

4. On or about November 26, 2013, Respondent entered into an agreement for, charged, and/or collected from Cheryl Rayner and Robert Wilson a fee of \$3,752.55 to perform legal services in the form of a loan modification that was illegal because the services were performed with respect to a property located in New Jersey, a jurisdiction where Respondent was not admitted to practice, in willful violation of the Rules of Professional Conduct, rule 4-200(A).

COUNT FOUR

Case No. 14-O-05466
Rules of Professional Conduct, Rule 1-300(B)
[Unauthorized Practice of Law in Other Jurisdiction]

5. From on or about March 12, 2014 through on or about June 16, 2014, Respondent practiced law in Maryland by agreeing to perform legal services in the form of a loan modification on behalf of Robert Muise in connection with his property in Maryland, when to do so was in violation of the regulations of the profession in Maryland, namely Maryland Rules of Professional Conduct, rule 5.5, in willful violation of the Rules of Professional Conduct, rule 1-300(B).

COUNT FIVE

Case No. 14-O-05466
Rules of Professional Conduct, Rule 1-300(A)
[Aiding the Unauthorized Practice of Law]

6. From on or about March 12, 2014 through on or about June 16, 2014, Respondent aided Office manager/administrator, Mike Nejad and his staff, who are not licensed to practice law in either Maryland or California, in the unauthorized practice of law, by knowingly allowing Nejad and his staff to provide legal advice to Robert Muise related to loan modification services, in willful violation of Rules of Professional Conduct, rule 1-300(A).

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COUNT SIX

Case No. 14-O-05466
Rules of Professional Conduct, rule 4-200(A)
[Illegal Fee]

7. On or about March 12, 2014, Respondent entered into an agreement for, charged, and/or collected from Robert Muise a fee of \$3,995 to perform legal services in the form of a loan modification that was illegal because the services were performed with respect to a property located in Maryland, a jurisdiction where Respondent was not admitted to practice, in willful violation of the Rules of Professional Conduct, rule 4-200(A).

COUNT SEVEN

Case No. 14-O-05615
Rules of Professional Conduct, Rule 1-300(B)
[Unauthorized Practice of Law in Other Jurisdiction]

8. From on or about April 10, 2014 through on or about August 25, 2014, Respondent practiced law in New Mexico by agreeing to perform legal services in the form of a loan modification on behalf of Timothy McThias in connection with his property in New Mexico, when to do so was in violation of the regulations of the profession in New Mexico, namely New Mexico Statutes, Chapter 36, Article 2, section 36-2-27, in willful violation of the Rules of Professional Conduct, rule 1-300(B).

COUNT EIGHT

Case No. 14-O-05615
Rules of Professional Conduct, Rule 1-300(A)
[Aiding the Unauthorized Practice of Law]

9. From on or about April 10, 2014 through on or about August 25, 2014, Respondent aided Office manager/administrator, Mike Nejad and his staff, who are not licensed to practice law in either New Mexico or California, in the unauthorized practice of law, by knowingly allowing Nejad and his staff to provide legal advice to Timothy McThias related to loan modification services, in willful violation of Rules of Professional Conduct, rule 1-300(A).

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COUNT NINE

Case No. 14-O-05615
Rules of Professional Conduct, rule 4-200(A)
[Illegal Fee]

10. On or about April 10, 2014, Respondent entered into an agreement for, charged, and/or collected from Timothy McThias a fee of \$1,800 to perform legal services in the form of a loan modification that was illegal because the services were performed with respect to a property located in New Mexico, a jurisdiction where Respondent was not admitted to practice, in willful violation of the Rules of Professional Conduct, rule 4-200(A).

COUNT TEN

Case No. 15-O-10032
Rules of Professional Conduct, Rule 1-300(B)
[Unauthorized Practice of Law in Other Jurisdiction]

11. From on or about October 16, 2013 through on or about September 30, 2014, Respondent practiced law in New Jersey by agreeing to perform legal services in the form of a loan modification on behalf of Peter Christos in connection with his property in New Jersey, when to do so was in violation of the regulations of the profession in New Jersey, namely New Jersey Rules of Professional Conduct, rule 5.5, in willful violation of the Rules of Professional Conduct, rule 1-300(B).

COUNT ELEVEN

Case No. 15-O-10032
Rules of Professional Conduct, Rule 1-300(A)
[Aiding the Unauthorized Practice of Law]

12. From on or about October 16, 2013 through on or about September 30, 2014, Respondent aided Office manager/administrator, Mike Nejad and his staff, who are not licensed to practice law in either New Jersey or California, in the unauthorized practice of law, by knowingly allowing Nejad and his staff to provide legal advice to Peter Christos related to loan modification services, in willful violation of Rules of Professional Conduct, rule 1-300(A).

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COUNT TWELVE

Case No. 15-O-10032
Rules of Professional Conduct, rule 4-200(A)
[Illegal Fee]

13. On or about October 16, 2013, Respondent entered into an agreement for, charged, and/or collected from Peter Christos a fee of \$3,500 to perform legal services in the form of a loan modification that was illegal because the services were performed with respect to a property located in New Jersey, a jurisdiction where Respondent was not admitted to practice, in willful violation of the Rules of Professional Conduct, rule 4-200(A).

COUNT THIRTEEN

Case No. 15-O-10087
Rules of Professional Conduct, Rule 1-300(B)
[Unauthorized Practice of Law in Other Jurisdiction]

14. From on or about April 15, 2014 through in or about July, 2014, Respondent practiced law in Maryland by agreeing to perform legal services in the form of a loan modification on behalf of Lois Lawrence in connection with her property in Maryland, when to do so was in violation of the regulations of the profession in Maryland, namely Maryland Rules of Professional Conduct, rule 5.5, in willful violation of the Rules of Professional Conduct, rule 1-300(B).

COUNT FOURTEEN

Case No. 15-O-10087
Rules of Professional Conduct, Rule 1-300(A)
[Aiding the Unauthorized Practice of Law]

15. From on or about through on or about April 15, 2014 through in or about July, 2014, Respondent aided Office manager/administrator, Mike Nejad and his staff, who are not licensed to practice law in either Maryland or California, in the unauthorized practice of law, by knowingly allowing Nejad and his staff to provide legal advice to Lois Lawrence related to loan modification services, in willful violation of Rules of Professional Conduct, rule 1-300(A).

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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: July 8 '15

By: Hugh G. Radigan
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-04902, 14-O-05466, 14-O-05615, 15-O-10032 and 15-O-10087

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, CA 90017-2515, 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

[X] By U.S. First-Class Mail: (CCP §§ 1013 and 1013(a)) [X] 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.

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

[X] (for Certified Mail) in a sealed envelope placed for collection and mailing as certified mail, return receipt requested, Article No.: 9414 7266 9904 2010 0723 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: Angela E. Mueller, The Law Offices of Angela Mueller, APC, PO Box 5149, San Diego, CA 92165, 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'). 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: July 8, 2015

SIGNED:

[Handwritten Signature]

JULI FINNILA Declarant