



1 STATE BAR OF CALIFORNIA
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FILED

APR 29 2016

STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

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STATE BAR COURT

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HEARING DEPARTMENT - LOS ANGELES

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In the Matter of:

) Case Nos. 14-O-06211, 15-O-12370,
) 15-O-13565, 15-O-14573 and 15-O-14819

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CHRISTIAN RHADAMES JUAREZ,
No. 175611

) NOTICE OF DISCIPLINARY CHARGES

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Members of the State Bar.

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NOTICE - FAILURE TO RESPOND!

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**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:**

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(1) YOUR DEFAULT WILL BE ENTERED;

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**(2) YOUR STATUS WILL BE CHANGED TO INACTIVE AND YOU
WILL NOT BE PERMITTED TO PRACTICE LAW;**

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**(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;**

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**(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.**

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1 The State Bar of California alleges:

2 JURISDICTION

3 1. CHRISTIAN RHADAMES JUAREZ ("Respondent") was admitted to the practice of
4 law in the State of California on December 30, 1994, was a member at all times pertinent to these
5 charges, and is currently a member of the State Bar of California.

6 COUNT ONE

7 Case No. 14-O-06211
8 Rules of Professional Conduct, rule 3-110(A)
[Failure to Perform with Competence]

9 2. On or about July 13, 2013, Sandra Peters employed Respondent to perform legal
10 services, namely to represent her as a beneficiary in a probate matter, *In the Estate of John York*,
11 Orange County Superior Court case no. 330-2013-00670014-PR-PL-CJC, which Respondent
12 intentionally, recklessly or repeatedly failed to perform with competence in willful violation of
13 Rules of Professional Conduct, rule 3-110(A), by failing to perform any services on her behalf.

14 COUNT TWO

15 Case No. 14-O-06211
16 Business and Professions Code, section 6068(m)
[Failure to Respond to Client Inquiries]

17 3. Respondent failed to respond promptly to numerous reasonable status inquiries made
18 by Respondent's client, Sandra Peters, by text messages, emails and telephone calls, between in
19 or about July 2013 and November 2014, that Respondent received, in a matter in which
20 Respondent had agreed to provide legal services, in willful violation of Business and Professions
21 Code, section 6068(m).

22 COUNT THREE

23 Case No. 14-O-06211
24 Rules of Professional Conduct, rule 3-300
[Business Transaction with a Client]

25 4. In or about August 2013, Respondent entered into a business transaction with his
26 client, Sandra Peters, specifically, a loan of \$5,700 from Respondent to Peters.

27 a) Respondent did not fully disclose in writing to Peters the terms of the business
28 transaction;

1 in a manner which should reasonably have been understood by Peters;
2 b) Respondent did not advise Peters in writing that she may seek the advice of an
3 independent lawyer of the client's choice and did not give the client a reasonable
4 opportunity to seek that advice;
5 c) The client did not consent in writing to the terms of the transaction, and Respondent
6 thereby willfully violated Rules of Professional Conduct, rule 3-300.

7 COUNT FOUR

8 Case No. 14-O-06211
9 Rules of Professional Conduct, rule 3-700(D)(2)
[Failure to Refund Unearned Fees]

10 5. Between in or about January 2014 and March 2014, Respondent received the sum of
11 approximately \$62,000, on his client Sandra Peters' behalf, in connection with Respondent's
12 representation of the client in a probate matter, *In the Estate of John York*, Orange County
13 Superior Court case no. 330-2013-00670014-PR-PL-CJC. Respondent failed to perform any
14 legal services for the client, and therefore earned none of the money. Respondent failed to
15 promptly refund any part of the approximately \$62,000 to the client upon Respondent's
16 termination of employment in or about November 2014, in willful violation of Rules of
17 Professional Conduct, rule 3-700(D)(2).

18 COUNT FIVE

19 Case No. 14-O-06211
20 Rules of Professional Conduct, rule 4-100(B)(3)
[Failure to Render Accounts of Client Funds]

21 6. Between in or about January 2014 and March 2014, Respondent received the sum of
22 approximately \$62,000, on his client Sandra Peters' behalf. Respondent thereafter failed to
23 render an appropriate accounting to the client regarding those funds upon Respondent's
24 termination of employment in or about November, 2014, and despite numerous requests from
25 Peters for an accounting, in willful violation of the Rules of Professional Conduct, rule 4-
26 100(B)(3).

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COUNT SIX

Case No. 14-O-06211
Business and Professions Code, section 6106
[Moral Turpitude – Taking of Funds by False Pretenses]

7. Between in or about January 2014 and March 2014, Respondent received the sum of approximately \$62,000, on his client Sandra Peters’ behalf, in connection with Respondent’s representation of the client in a probate matter, *In the Estate of John York*, Orange County Superior Court case no. 330-2013-00670014-PR-PL-CJC. Respondent dishonestly represented to his client that he had earned fees of approximately \$62,000 regarding the probate case, when he had performed no work on the matter and knew that he had not earned any fees. The client relied on respondent’s dishonest misrepresentations and entrusted him respondent with approximately \$62,000. By inducing his client to entrust him with approximately \$62,000 based on false pretenses, Respondent committed an act involving moral turpitude, dishonesty or corruption in willful violation of Business and Professions Code, section 6106.

COUNT SEVEN

Case No. 15-O-12370
Rules of Professional Conduct, rule 4-100(A)
[Failure to Maintain Client Funds in Trust Account]

8. On or about December 24, 2014, Respondent received on behalf of Respondent’s client, Edison Palacios, advanced costs for the taking of two depositions in the matter of *Edison Palacios v. Palomino Homeowners Association, et al.*, Riverside County Superior Court case no. PSC1406331, in the amount of \$1,500. On or about December 26, 2014, Respondent deposited the \$1,500 into Respondent’s client trust account at Bank of America, account no. xxxx8357 on behalf of the client. Of this sum, the client was entitled to \$1,500, as the depositions did not take place and no other costs were incurred in the case. Respondent failed to maintain a balance of \$1,500 on behalf of the client in Respondent’s client trust account, in willful violation of Rules of Professional Conduct, rule 4-100(A).

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COUNT EIGHT

Case No. 15-O-12370
Business and Professions Code, section 6106
[Moral Turpitude - Misappropriation]

9. On or about December 24, 2014, Respondent received on behalf of Respondent's client, Edison Palacios, advanced costs for the taking of two depositions in the matter of *Edison Palacios v. Palomino Homeowners Association, et al.*, Riverside County Superior Court case no. PSC1406331, in the amount of \$1,500. On or about December 26, 2014, Respondent deposited the \$1,500 into Respondent's client trust account at Bank of America, account no. xxxx8357 on behalf of the client. The deposition never took place and no other costs were incurred in the case. Between on or about December 24, 2014 and January 5, 2015, Respondent dishonestly or grossly negligently misappropriated for Respondent's own purposes \$1,492.19 that Respondent's client, Edison Palacios, was entitled to receive, and thereby committed an act involving moral turpitude, dishonesty or corruption in willful violation of Business and Professions Code, section 6106.

COUNT NINE

Case No. 15-O-12370
Rules of Professional Conduct, rule 4-100(B)(4)
[Failure to Pay Client Funds Promptly]

10. On or about December 24, 2014, Respondent received on behalf of Respondent's client, Edison Palacios, advanced costs for the taking of two depositions in the matter of *Edison Palacios v. Palomino Homeowners Association, et al.*, Riverside County Superior Court case no. PSC1406331, in the amount of \$1,500. Of this sum, the client was entitled to \$1,500 as the depositions did not take place and no other costs were incurred in the case. On or about March 26, 2015, the client requested that Respondent refund the \$1,500 in advanced costs. To date, Respondent has failed to pay promptly, as requested by Respondent's client, Edison Palacios, any portion of the \$1,500 in Respondent's possession in willful violation of Rules of Professional Conduct, rule 4-100(B)(4).

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COUNT TEN

Case No. 15-O-12370
Rules of Professional Conduct, rule 4-100(B)(3)
[Failure to Render Accounts of Client Funds]

11. On or about July 7 and 14, 2014, Respondent received from Respondent's client, Edison Palacios, the total sum of \$5,000 as advanced fees for legal services to be performed in *Edison Palacios v. Palomino Homeowners Association, et al.*, Riverside County Superior Court case no. PSC1406331. On or about December 24, 2014, Respondent received from Respondent's client, Edison Palacios, \$1,500 as advanced costs. Respondent thereafter failed to render an appropriate accounting to the client regarding those funds following Respondent's disqualification by the court from representing the client, Respondent's subsequent withdrawal from the case, and following the client's request for an accounting on or about June 26, 2015, in willful violation of the Rules of Professional Conduct, rule 4-100(B)(3).

COUNT ELEVEN

Case No. 15-O-12370
Rules of Professional Conduct, rule 3-310(B)(3)
[Conflict - Relationship with an Interested Person or Entity]

12. On or about July 5, 2014, Respondent accepted representation of a client, Edison Palacios, regarding a claim against Palomino Homeowners Association, without providing written disclosure to the client that Respondent had a legal relationship with another person or entity, specifically Palomino Homeowners Association, which Respondent knew or reasonably should have known would be affected substantially by the resolution of the matter in that the client, Edison Palacios, was making a claim for damages and/or other relief against Palomino Homeowners Association, in willful violation of the Rules of Professional Conduct, rule 3-310(B)(3).

COUNT TWELVE

Case No. 15-O-12370
Business and Professions Code, section 6068(i)
[Failure to Cooperate in State Bar Investigation]

13. 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 letter of June

1 18, 2015, which Respondent received, that requested Respondent's response to the allegations of
2 misconduct being investigated in case no. 15-O-12370, in willful violation of Business and
3 Professions Code, section 6068(i).

4 COUNT THIRTEEN

5 Case No. 15-O-13565
6 Rules of Professional Conduct, rule 4-100(A)
7 [Commingling – Payment of Personal Expenses from Client Trust Account]

8 14. Between on or about January 2, 2015 through May 9, 2015, Respondent issued the
9 following checks from funds in Respondent's client trust account at Bank of America, account
10 no. xxxx8357, for the payment of personal expenses, in willful violation of Rules of Professional
11 Conduct, rule 4-100(A):

<u>CHECK #</u>	<u>PAYEE</u>	<u>AMOUNT</u>
12 1473	Ashley Yeager	\$4,050
13 1473	Tremont Apartments, LLC	\$2,875
14 1479	Tremont Apartments, LLC	\$2,860
15 1480	Tremont Apartments, LLC	\$30
16 1483	Tremont Apartments, LLC	\$2,900

17 COUNT FOURTEEN

18 Case No. 15-O-13565
19 Rules of Professional Conduct, rule 4-100(A)
20 [Commingling Personal Funds in Client Trust Account]

21 15. On or about December 31, 2014, March 26, 2015, and April 10, 2015, Respondent
22 deposited or commingled funds belonging to Respondent into Respondent's client trust account
23 at Bank of America, account no. xxxx8357, as follows in wilful violation Rules of Professional
24 Conduct, rule 4-100(A):

<u>DATE OF DEPOSIT</u>	<u>AMT. DEPOSITED</u>	<u>FORM OF DEPOSIT</u>
25 December 31, 2014	\$5,000	Check from CAZ Investments, LLC
26 March 26, 2015	\$8,000	Check from Law Office of Richard Mendez
27 April 10, 2015	\$5,000	Check from CAZ Investments, LLC

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COUNT FIFTEEN

Case No. 15-O-13565
Business and Professions Code, section 6068(i)
[Failure to Cooperate in State Bar Investigation]

16. 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 letter of October 20, 2015, which Respondent received, that requested Respondent’s response to the allegations of misconduct being investigated in case no. 15-O-13565, in willful violation of Business and Professions Code, section 6068(i).

COUNT SIXTEEN

Case No. 15-O-14573
Rules of Professional Conduct, rule 3-110(A)
[Failure to Perform with Competence]

17. In or about September 2009, Ronald van Bebber employed Respondent to perform legal services, namely, to represent him in a civil case, *van Bebber v. Barreras*, Los Angeles Superior Court case no. BC413489, which Respondent intentionally, recklessly, or repeatedly failed to perform with competence, in willful violation of Rules of Professional Conduct, rule 3-110(A), by failing to obey the court’s order to submit a proposed Interlocutory Judgment within fifteen days of the court’s issuance of a Tentative Decision After Bench Trial on November 14, 2011, and thereafter not submitting a proposed Interlocutory Judgment until August 6, 2012.

COUNT SEVENTEEN

Case No. 15-O-14573
Business and Professions Code, section 6103
[Failure to Obey a Court Order]

18. Respondent disobeyed or violated an order of the court requiring Respondent to do or forbear an act connected with or in the course of Respondent's profession which Respondent ought in good faith to do or forbear by failing to comply with the November 14, 2011 Tentative Decision After Bench Trial in *van Bebber v. Barreras*, Los Angeles Superior Court case no. BC413489 which ordered respondent to file a proposed interlocutory judgment within fifteen days of the issuance of the Tentative Decision After Bench Trial, in willful violation of Business and Professions Code, section 6103.

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COUNT EIGHTEEN

Case No. 15-O-14573
Business and Professions Code, section 6068(m)
[Failure to Respond to Client Inquiries]

19. Respondent failed to respond promptly to multiple, reasonable e-mail status inquiries made by Respondent's client, Ronald van Bebber, between November 2011 and August 2012, that Respondent received in a matter in which Respondent had agreed to provide legal services, in willful violation of Business and Professions Code, section 6068(m).

COUNT NINETEEN

Case No. 15-O-14573
Rules of Professional Conduct, rule 3-110(A)
[Failure to Perform with Competence]

20. In or about September 2009, Ronald van Bebber employed Respondent to perform legal services, namely, to represent him in a civil case, *van Bebber v. Barreras*, Los Angeles Superior Court case no. BC413489. As part of this representation, Respondent was to file an adversary proceeding in *In re Barreras*, United States Bankruptcy Court, Central District of California case no. 13-BK-12117 on behalf of his client, which Respondent intentionally, recklessly, or repeatedly failed to perform with competence, in willful violation of Rules of Professional Conduct, rule 3-110(A), by failing to file a proof of service for the summons and complaint and not requesting an alias summons for the adversary proceeding (case no. 2:13-AP-01466), resulting in the dismissal of the adversary proceeding.

COUNT TWENTY

Case No. 15-O-14573
Business and Professions Code, section 6068(m)
[Failure to Inform Client of Significant Development]

21. Respondent failed to keep Respondent's client, Ronald van Bebber, reasonably informed of significant developments in a matter in which Respondent had agreed to provide legal services, in willful violation of Business and Professions Code, section 6068(m), by failing to inform the client of the following: on December 5, 2013 the court in *In re Barreras*, United States Bankruptcy Court, Central District of California case no. 13-BK-12117 dismissed the adversary proceeding (case no. 2:13-AP-01466) that Respondent filed on behalf of his client,

1 Ronald van Bebber, due to Respondent's failure to file a proof of service for the summons and
2 complaint, and failure to request an alias summons.

3 COUNT TWENTY-ONE

4 Case No. 15-O-14573
5 Business and Professions Code, section 6068(m)
6 [Failure to Respond to Client Inquiries]

7 22. Respondent failed to respond promptly to multiple, reasonable e-mail status inquiries
8 made by Respondent's client, Ronald van Bebber, between February 2013 and February 2014,
9 that Respondent received in a matter in which Respondent had agreed to provide legal services,
10 in willful violation of Business and Professions Code, section 6068(m).

11 COUNT TWENTY-TWO

12 Case No. 15-O-14573
13 Business and Professions Code, section 6106
14 [Moral Turpitude - Misrepresentation]

15 23. On or about December 27, 2011, Respondent stated in writing to Respondent's client,
16 Ronald van Bebber, that Respondent had filed a proposed Interlocutory Judgment in *van Bebber*
17 *v. Barreras*, Los Angeles Superior Court case no. BC413489, when Respondent knew or was
18 grossly negligent in not knowing the statement(s) were false, in that at that time he had not filed
19 a proposed Interlocutory Judgment, and thereby committed an act involving moral turpitude,
20 dishonesty or corruption in willful violation of Business and Professions Code, section 6106.

21 COUNT TWENTY-THREE

22 Case No. 15-O-14573
23 Business and Professions Code, section 6106
24 [Moral Turpitude - Misrepresentation]

25 24. On or about February 20, 2014 through April 13, 2013, Respondent stated in writing
26 to Respondent's client, Ronald van Bebber, that Respondent was preparing a motion for relief
27 from an automatic stay to file in *In re Barreras*, United States Bankruptcy Court, Central District
28 of California case no. 13-BK-12117, that said motion would be heard on April 22, 2013, and
later that said motion would be heard on May 13, 2013, when Respondent knew or was grossly
negligent in not knowing the statements were false, in that the motion was never filed and no

1 hearing date was set, and thereby committed an act involving moral turpitude, dishonesty or
2 corruption in willful violation of Business and Professions Code, section 6106.

3 COUNT TWENTY-FOUR

4 Case No. 15-O-14573
5 Rules of Professional Conduct, rule 4-100(B)(3)
6 [Failure to Render Accounts of Client Funds]

7 25. In or about September 2009 through January 2014, Respondent received from
8 Respondent's client, Ronald van Bebber, at least \$107,197 as advanced fees for legal services to
9 be performed. Respondent thereafter failed to render an appropriate accounting to the client
10 regarding those funds upon the termination of Respondent's employment in or about January
11 2014, in willful violation of the Rules of Professional Conduct, rule 4-100(B)(3).

12 COUNT TWENTY-FIVE

13 Case No. 15-O-14573
14 Business and Professions Code, section 6068(i)
15 [Failure to Cooperate in State Bar Investigation]

16 26. Respondent failed to cooperate and participate in a disciplinary investigation pending
17 against Respondent by failing to provide a substantive response to the State Bar's letter of
18 October 26, 2015, which Respondent received, that requested Respondent's response to the
19 allegations of misconduct being investigated in case no. 15-O-14573, in willful violation of
20 Business and Professions Code, section 6068(i).

21 COUNT TWENTY-SIX

22 Case No. 15-O-14819
23 Rules of Professional Conduct, rule 4-100(A)
24 [Failure to Maintain Client Funds in Trust Account]

25 27. In or about November 2012, Respondent received on behalf of Respondent's client,
26 Nancy Schmitt, a settlement check from First American Title Company made payable "Christian
27 R. Juarez, Attorney at Law, Attorney Trust Account," in the sum of \$90,000. On or about
28 November 13, 2012, Respondent deposited the \$90,000 into Respondent's client trust account at
Bank of America, account no. xxxx8357 on behalf of the client. Of this sum, the client was
entitled to \$60,300. On or about, March 13, 2013, Respondent should have maintained \$52,300

1 in his client trust account on behalf of the client, but Respondent failed to maintain a balance of
2 \$52,300, in willful violation of Rules of Professional Conduct, rule 4-100(A).

3 COUNT TWENTY-SEVEN

4 Case No. 15-O-14819
5 Business and Professions Code, section 6106
6 [Moral Turpitude - Misappropriation]

7 28. In or about November 2012, Respondent received on behalf of Respondent's client,
8 Nancy Schmitt, a settlement check from First American Title Company made payable "Christian
9 R. Juarez, Attorney at Law, Attorney Trust Account," in the sum of \$90,000. On or about
10 November 13, 2012, Respondent deposited the \$90,000 into Respondent's client trust account at
11 Bank of America, account no. xxxx8357 on behalf of the client. On or about March 13, 2013,
12 Respondent dishonestly or grossly negligently misappropriated for Respondent's own purposes
13 \$43,710.19 that Respondent's client, Nancy Schmitt, was entitled to receive, and thereby
14 committed an act involving moral turpitude, dishonesty or corruption in willful violation of
15 Business and Professions Code, section 6106.

16 COUNT TWENTY-EIGHT

17 Case No. 15-O-14819
18 Rules of Professional Conduct, rule 4-100(B)(4)
19 [Failure to Pay Client Funds Promptly]

20 29. In or about November 2012, Respondent received on behalf of Respondent's client,
21 Nancy Schmitt, a settlement check from First American Title Company made payable "Christian
22 R. Juarez, Attorney at Law, Attorney Trust Account," in the sum of \$90,000. Of this sum, the
23 client was entitled \$60,300. Of this amount, the client has yet to receive \$31,300. In or about
24 March 2013 through July 2015, the client requested that Respondent make payment of her funds
25 to her. To date, Respondent has failed to pay promptly, as requested by Respondent's client, any
26 portion of the \$31,300 in Respondent's possession in willful violation of Rules of Professional
27 Conduct, rule 4-100(B)(4).

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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: A. 29 2016

By: _____
R. KEVIN BUCHER
Deputy Trial Counsel

DATED: April 29 2016

By: Alex Hackert
ALEX HACKERT
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-06211; 15-O-12370; 15-O-13565; 15-O-14573 and 15-O-14819

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))

- 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 U.S. Certified Mail: (CCP §§ 1013 and 1013(a))



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 0732 46 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	Business-Residential Address	Fax Number	Courtesy Copy to:
CHRISTIAN RHADAMES JUAREZ	8149 Santa Monica Blvd # 140 Los Angeles, CA 90046	Electronic Address	8149 Santa Monica Blvd # 140 Los Angeles, CA 90046



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: April 29, 2016

SIGNED:

Genelle De Luca-Suarez
Declarant