State Bar Court of California **Hearing Department** Los Angeles **REPROVAL** Counsel For The State Bar For Court use only Case Number(s): 15-C-12538-DFM **NOT FOR PUBLICATION** Alex Hackert **Deputy Trial Counsel** 845 S. Figueroa St. Los Angeles, CA 90017 (213) 765-1498 FILED Bar # 267342 MAY 02 2016 Counsel For Respondent STATE BAR COURT Blithe C. Leece CLERK'S OFFICE LOS ANGELES Law Office of Blithe C. Leece 21250 Hawthorne Blvd. Suite 500 Torrance, CA 90503 (310) 792-8664 Submitted to: Assigned Judge STIPULATION RE FACTS, CONCLUSIONS OF LAW AND Bar # 202208 **DISPOSITION AND ORDER APPROVING** In the Matter of: **ALEXANDER BAKHACHE PEREZ** PRIVATE REPROVAL ☐ PREVIOUS STIPULATION REJECTED Bar # 179331 A Member of the State Bar of California (Respondent)

Note: All information required by this form and any additional information which cannot be provided in the space provided, must be set forth in an attachment to this stipulation under specific headings, e.g., "Facts," "Dismissals," "Conclusions of Law," "Supporting Authority," etc.

A. Parties' Acknowledgments:

- (1) Respondent is a member of the State Bar of California, admitted **December 4**, 1995.
- (2) The parties agree to be bound by the factual stipulations contained herein even if conclusions of law or disposition are rejected or changed by the Supreme Court.
- (3) All investigations or proceedings listed by case number in the caption of this stipulation are entirely resolved by this stipulation and are deemed consolidated. Dismissed charge(s)/count(s) are listed under "Dismissals." The stipulation consists of 11 pages, not including the order.
- (4) A statement of acts or omissions acknowledged by Respondent as cause or causes for discipline is included under "Facts."

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(5)		clusio	ons of law, drawn from and specifically referring to the facts are also included under "Conclusions of
(6)			es must include supporting authority for the recommended level of discipline under the heading ng Authority."
(7)	No l	more ding i	than 30 days prior to the filing of this stipulation, Respondent has been advised in writing of any nvestigation/proceeding not resolved by this stipulation, except for criminal investigations.
(8)	Pay 614	ment 0.7. (of Disciplinary Costs—Respondent acknowledges the provisions of Bus. & Prof. Code §§6086.10 & Check one option only):
		Co	sts are added to membership fee for calendar year following effective date of discipline (public
		Ca Co (Ha Re Co	se ineligible for costs (private reproval). sts are to be paid in equal amounts prior to February 1 for the following membership years: ardship, special circumstances or other good cause per rule 5.132, Rules of Procedure.) If spondent fails to pay any installment as described above, or as may be modified by the State Bar urt, the remaining balance is due and payable immediately.
			sts are waived in part as set forth in a separate attachment entitled "Partial Waiver of Costs". sts are entirely waived.
(9)	The	parti	es understand that:
	(a)		A private reproval imposed on a respondent as a result of a stipulation approved by the Court prior to initiation of a State Bar Court proceeding is part of the respondent's official State Bar membership records, but is not disclosed in response to public inquiries and is not reported on the State Bar's web page. The record of the proceeding in which such a private reproval was imposed is not available to the public except as part of the record of any subsequent proceeding in which it is introduced as evidence of a prior record of discipline under the Rules of Procedure of the State Bar.
	(b)	\boxtimes	A private reproval imposed on a respondent after initiation of a State Bar Court proceeding is part of the respondent's official State Bar membership records, is disclosed in response to public inquiries and is reported as a record of public discipline on the State Bar's web page.
	(c)		A public reproval imposed on a respondent is publicly available as part of the respondent's official State Bar membership records, is disclosed in response to public inquiries and is reported as a record of public discipline on the State Bar's web page.
Mis	aggr conduired	duct	ing Circumstances [Standards for Attorney Sanctions for Professional, standards 1.2(h) & 1.5]. Facts supporting aggravating circumstances are
(1)		Prio	r record of discipline
	(a)		State Bar Court case # of prior case
	(b)		Date prior discipline effective
	(c)		Rules of Professional Conduct/ State Bar Act violations:
	(d)		Degree of prior discipline
	(e)		If Respondent has two or more incidents of prior discipline, use space provided below or a separate attachment entitled "Prior Discipline".

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(2)		Intentional/Bad Faith/Dishonesty: Respondent's misconduct was dishonest, intentional, or surrounded by, or followed by bad faith.
(3)		Misrepresentation: Respondent's misconduct was surrounded by, or followed by misrepresentation.
(4)		Concealment: Respondent's misconduct was surrounded by, or followed by concealment.
(5)		Overreaching: Respondent's misconduct was surrounded by, or followed by overreaching.
(6)		Uncharged Violations: Respondent's conduct involves uncharged violations of the Business and Professions Code or the Rules of Professional Conduct.
(7)		Trust Violation: Trust funds or property were involved and Respondent refused or was unable to account to the client or person who was the object of the misconduct for improper conduct toward said funds or property.
(8)		Harm: Respondent's misconduct harmed significantly a client, the public, or the administration of justice.
(9)	\boxtimes	Indifference: Respondent demonstrated indifference toward rectification of or atonement for the consequences of his or her misconduct. See page 8.
(10)		Candor/Lack of Cooperation: Respondent displayed a lack of candor and cooperation to victims of his/her misconduct, or to the State Bar during disciplinary investigations or proceedings.
(11)		Multiple Acts: Respondent's current misconduct evidences multiple acts of wrongdoing.
(12)		Pattern: Respondent's current misconduct demonstrates a pattern of misconduct.
(13)		Restitution: Respondent failed to make restitution.
(14)		Vulnerable Victim: The victim(s) of Respondent's misconduct was/were highly vulnerable.
(15)		No aggravating circumstances are involved.
Addi	tiona	al aggravating circumstances:
	_	ating Circumstances [see standards 1.2(i) & 1.6]. Facts supporting mitigating stances are required.
(1)		No Prior Discipline: Respondent has no prior record of discipline over many years of practice coupled with present misconduct which is not likely to recur.
(2)		No Harm: Respondent did not harm the client, the public, or the administration of justice.
(3)		Candor/Cooperation: Respondent displayed spontaneous candor and cooperation with the victims of his/her misconduct or to the State Bar during disciplinary investigations and proceedings.
(4)		Remorse: Respondent promptly took objective steps demonstrating spontaneous remorse and recognition of the wrongdoing, which steps were designed to timely atone for any consequences of his/her misconduct

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(5)		Restitution: Respondent paid \$ on in restitution to without the threat or force of disciplinary, civil or criminal proceedings.			
(6)		Delay: These disciplinary proceedings were excessively delayed. The delay is not attributable to Respondent and the delay prejudiced him/her.			
(7)		Good Faith: Respondent acted with a good faith belief that was honestly held and objectively reasonable.			
(8)	Emotional/Physical Difficulties: At the time of the stipulated act or acts of professional misconduct Respondent suffered extreme emotional difficulties or physical or mental disabilities which expert testimony would establish was directly responsible for the misconduct. The difficulties or disabilities were not the product of any illegal conduct by the member, such as illegal drug or substance abuse, and the difficulties or disabilities no longer pose a risk that Respondent will commit misconduct.				
(9)		Severe Financial Stress: At the time of the misconduct, Respondent suffered from severe financial stress which resulted from circumstances not reasonably foreseeable or which were beyond his/her control and which were directly responsible for the misconduct.			
(10)		Family Problems: At the time of the misconduct, Respondent suffered extreme difficulties in his/her personal life which were other than emotional or physical in nature.			
(11)		Good Character: Respondent's extraordinarily good character is attested to by a wide range of references in the legal and general communities who are aware of the full extent of his/her misconduct.			
(12)		Rehabilitation: Considerable time has passed since the acts of professional misconduct occurred followed by subsequent rehabilitation.			
(13)		No mitigating circumstances are involved.			
Addi	tion	al mitigating circumstances:			
		Pretrial Stipulation, see page 8.			
		No Prior record of Discipline, see page 8.			
		Good Character, see page 9.			
D. D	D. Discipline:				
(1)	\boxtimes	Private reproval (check applicable conditions, if any, below)			
	(a)	Approved by the Court prior to initiation of the State Bar Court proceedings (no public disclosure).			
<u>or</u>	(b)	Approved by the Court after initiation of the State Bar Court proceedings (public disclosure).			
(2)		Public reproval (Check applicable conditions, if any, below)			
E. C	ond	litions Attached to Reproval:			
(1)	\boxtimes	Respondent must comply with the conditions attached to the reproval for a period of one year .			

<u>(Do n</u>	(Do not write above this line.)				
(2)	\boxtimes	During the condition period attached to the reproval, Respondent must comply with the provisions of the State Bar Act and Rules of Professional Conduct.			
(3)	\boxtimes	Within ten (10) days of any change, Respondent must report to the Membership Records Office of the State Bar and to the Office of Probation of the State Bar of California ("Office of Probation"), all changes of information, including current office address and telephone number, or other address for State Bar purposes, as prescribed by section 6002.1 of the Business and Professions Code.			
(4)		Within thirty (30) days from the effective date of discipline, Respondent must contact the Office of Probation and schedule a meeting with Respondent's assigned probation deputy to discuss these terms and conditions of probation. Upon the direction of the Office of Probation, Respondent must meet with the probation deputy either in-person or by telephone. During the period of probation, Respondent must promptly meet with the probation deputy as directed and upon request.			
(5)		Respondent must submit written quarterly reports to the Office of Probation on each January 10, April 10, July 10, and October 10 of the condition period attached to the reproval. Under penalty of perjury, Respondent must state whether Respondent has complied with the State Bar Act, the Rules of Professional Conduct, and all conditions of the reproval during the preceding calendar quarter. Respondent must also state in each report whether there are any proceedings pending against him or her in the State Bar Court and if so, the case number and current status of that proceeding. If the first report would cover less than 30 (thirty) days, that report must be submitted on the next following quarter date, and cover the extended period.			
		In addition to all quarterly reports, a final report, containing the same information, is due no earlier than twenty (20) days before the last day of the condition period and no later than the last day of the condition period.			
(6)		Respondent must be assigned a probation monitor. Respondent must promptly review the terms and conditions of probation with the probation monitor to establish a manner and schedule of compliance. During the period of probation, Respondent must furnish such reports as may be requested, in addition to the quarterly reports required to be submitted to the Office of Probation. Respondent must cooperate fully with the monitor.			
(7)		Subject to assertion of applicable privileges, Respondent must answer fully, promptly and truthfully any inquiries of the Office of Probation and any probation monitor assigned under these conditions which are directed to Respondent personally or in writing relating to whether Respondent is complying or has complied with the conditions attached to the reproval.			
(8)		Within one (1) year of the effective date of the discipline herein, Respondent must provide to the Office of Probation satisfactory proof of attendance at a session of the Ethics School, and passage of the test given at the end of that session.			
		☐ No Ethics School recommended. Reason: .			
(9)	\boxtimes	Respondent must comply with all conditions of probation imposed in the underlying criminal matter and must so declare under penalty of perjury in conjunction with any quarterly report to be filed with the Office of Probation.			
(10)		Respondent must provide proof of passage of the Multistate Professional Responsibility Examination ("MPRE"), administered by the National Conference of Bar Examiners, to the Office of Probation within one year of the effective date of the reproval.			
		☑ No MPRE recommended. Reason: The protection of the public and the interests of Respondent quire passage of the MPRE in this case. (See In the Matter of Respondent G (Review Dept. 1992) 2 Bar Ct. Rptr. 181; Cal. Rules of Court, rule 9.19.)			

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(11)	The f	following conditions are attached hereto a	nd inco	rporated:		
		Substance Abuse Conditions		Law Office Management Conditions		
		Medical Conditions		Financial Conditions		
F. Other	r Cor	nditions Negotiated by the Partie	s:			
None.						

ATTACHMENT TO

STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION

IN THE MATTER OF:

ALEXANDER BAKHACHE PEREZ

CASE NUMBER:

15-C-12538

FACTS AND CONCLUSIONS OF LAW.

Respondent admits that the following facts are true and that the facts and circumstances surrounding the offense for which he was convicted involved other misconduct warranting discipline.

Case No. 15-C-12538 (Conviction Proceedings)

PROCEDURAL BACKGROUND IN CONVICTION PROCEEDING:

- 1. This is a proceeding pursuant to sections 6101 and 6102 of the Business and Professions Code and rule 9.10 of the California Rules of Court.
- 2. On May 14, 2015, the Orange County District Attorney filed a criminal complaint in the Orange County Superior Court, case no. 15NM05979, charging respondent with one count of violating Penal Code section 647(a) [soliciting another to engage in lewd conduct], a misdemeanor.
- 3. On May 29, 2015, the court entered respondent's guilty plea to one count of violating Penal Code section 647(a) [soliciting another to engage in lewd conduct], a misdemeanor, and based thereon, the court found respondent guilty of that count.
- 4. On May 29, 2015, the court suspended imposition of sentencing and placed respondent on three years of informal probation, with terms including that respondent serve ninety days in county jail, with thirty days of such stayed on the condition of completion of thirty days of Cal Trans service, and that respondent complete an outpatient program with the Sexual Recovery Institute.
 - 5. Thereafter, respondent's conviction became final.
- 6. On January 8, 2016, the Review Department of the State Bar Court issued an order referring the matter to the Hearing Department for a hearing and decision recommending the discipline to be imposed in the event that the Hearing Department finds that the facts and circumstances surrounding the offense(s) for which Respondent was convicted involved moral turpitude or other misconduct warranting discipline.

FACTS:

7. On March 5, 2015, a Fullerton Police Department officer was assigned to an undercover investigation regarding complaints of sexual activity occurring at the public restrooms of the Brea Dam Park in Fullerton.

- 8. The officer was stationed in an unmarked vehicle parked in a dirt lot, close to one of the park's public restrooms. Respondent drove into the lot, parked his car and began walking towards the restroom. As he walked to the restroom, respondent looked back at the officer several times. The officer followed respondent into the men's restroom.
- 9. Inside the restroom, the officer found respondent seated in an open stall with his genitals exposed and masturbating. Respondent made eye contact with the officer, and then exited the stall with his genitals still exposed.
- 10. The officer told respondent he was going to check outside to see if anyone was around who might "interfere." Once the officer was back inside, respondent stood in plain view of the entrance to the restroom, exposed himself again and asked the officer, "what do you like?" The officer responded, "I like that," and respondent continued to masturbate.
- 11. The officer then exited the restroom and alerted other officers stationed nearby to arrest respondent. Respondent was arrested for indecent exposure and solicitation to commit a lewd act.
- 12. Respondent has submitted a letter from his therapist at the Sexual Recovery Institute indicating that respondent has been seen for individual and group therapy sessions since his conviction, in addition to attending weekly meetings of Sexual Compulsives Anonymous, all of which he is still enrolled in.
- 13. Respondent has a prior conviction in Orange County Superior Court case no. 03NM05071 for similar conduct that occurred at a park in Anaheim on April 10, 2003. On July 11, 2003, respondent plead guilty to one count of violating Penal Code section 647(a) (lewd conduct in a place exposed to public view) and one count of violating Penal Code section 314.1 (indecent exposure), both misdemeanors.

CONCLUSIONS OF LAW:

14. The facts and circumstances surrounding the above-described violation did not involve moral turpitude but did involve other misconduct warranting discipline.

AGGRAVATING CIRCUMSTANCES.

Indifference (Std. 1.5(k)): Respondent committed the current misconduct despite a prior conviction for nearly identical conduct, demonstrating an unwillingness to comply with the law.

MITIGATING CIRCUMSTANCES.

Pretrial Stipulation: Respondent is entitled to mitigation for entering into this stipulation prior to trial, thereby preserving State Bar time and resources, as well as acknowledging and accepting responsibility for his misconduct. (Silva-Vidor v. State Bar (1989) 49 Cal.3d 1071, 1079 [where mitigating credit was given for entering into a stipulation as to facts and culpability].)

No Record of Prior Discipline: Respondent was admitted to practice in 1995. At the time of the misconduct, respondent had no record of prior discipline over nineteen years in practice. However, the weight of this factor is significantly tempered by the fact that respondent committed nearly identical conduct in 2003, only eight years after he was admitted to practice.

Good Character: Respondent submitted two character reference letters from two attorneys who have each known respondent for over a decade. Both references attested to respondent's good character and are aware of the underlying criminal conviction. However, only one reference stated that she was also aware of the 2003 conviction. These references entitle respondent to very limited mitigating credit, as they do not represent a wide range of references in the legal and general communities. (In the Matter of Riordan (Review Dept. 2007) 5 Cal. State Bar Ct. Rptr. 41, 50.)

One of respondent's references and his therapist attested to respondent's pro bono work through his own practice and through the Hispanic Bar Association, as well as respondent's volunteer work with a food bank, on the board of directors of the OutFest film festival and the AIDS project of Los Angeles. Pro bono work and civic service can be considered in mitigation as evidence of good character. (*In the Matter of Respondent K* (Review Dept. 1993) 2 Cal. State Bar Ct. Rptr. 335, 359.)

AUTHORITIES SUPPORTING DISCIPLINE.

The Standards for Attorney Sanctions for Professional Misconduct "set forth a means for determining the appropriate disciplinary sanction in a particular case and to ensure consistency across cases dealing with similar misconduct and surrounding circumstances." (Rules Proc. of State Bar, tit. IV, Stds. for Atty. Sanctions for Prof. Misconduct, std. 1.1. All further references to Standards are to this source.) The Standards help fulfill the primary purposes of discipline, which include: protection of the public, the courts and the legal profession; maintenance of the highest professional standards; and preservation of public confidence in the legal profession. (See std. 1.1; *In re Morse* (1995) 11 Cal.4th 184, 205.)

Although not binding, the Standards are entitled to "great weight" and should be followed "whenever possible" in determining level of discipline. (In re Silverton (2005) 36 Cal.4th 81, 92, quoting In re Brown (1995) 12 Cal.4th 205, 220 and In re Young (1989) 49 Cal.3d 257, 267, fn. 11.) Adherence to the Standards in the great majority of cases serves the valuable purpose of eliminating disparity and assuring consistency, that is, the imposition of similar attorney discipline for instances of similar attorney misconduct. (In re Naney (1990) 51 Cal.3d 186, 190.) If a recommendation is at the high end or low end of a Standard, an explanation must be given as to how the recommendation was reached. (Std. 1.1.) "Any disciplinary recommendation that deviates from the Standards must include clear reasons for the departure." (Std. 1.1; Blair v. State Bar (1989) 49 Cal.3d 762, 776, fn. 5.)

In determining whether to impose a sanction greater or less than that specified in a given standard, in addition to the factors set forth in the specific Standard, consideration is to be given to the primary purposes of discipline; the balancing of all aggravating and mitigating circumstances; the type of misconduct at issue; whether the client, public, legal system or profession was harmed; and the member's willingness and ability to conform to ethical responsibilities in the future. (Stds. 1.7(b) and (c).)

Respondent's culpability in this proceeding is conclusively established by the record of his convictions. (Bus. & Prof. Code, § 6101(a); In re Crooks (1990) 51 Cal.3d 1090, 1097.) Respondent is presumed to have committed all of the elements of the crime of which he was convicted. (In re Duggan (1976) 17 Cal.3d 416, 423; In the Matter of Respondent O (Review Dept. 1993) 2 Cal. State Bar Ct. Rptr. 581, 588.)

Respondent's offense does not involve moral turpitude, but does involve other misconduct warranting discipline. "Criminal conduct not committed in the practice of law or against a client reveals moral turpitude if it shows a deficiency in any character trait necessary for the practice of law (such as

trustworthiness, honesty, fairness, candor, and fidelity to fiduciary duties) or if it involves such a serious breach of a duty owed to another or to society, or such a flagrant disrespect for the law or societal norms, that knowledge of the attorney's conduct would be likely to undermine public confidence in and respect for the legal profession." (*In re Lesansky* (2001) 25 Cal.4th 11, at 16.) In *In the Matter of Buckley* (Review Dept. 1990) 1 Cal. State Bar Ct. Rptr. 201, the attorney was convicted of solicitation in violation of Penal Code section 647(a), which was found not to involve moral turpitude.

Standard 2.16(b) is applicable to Respondent's misconduct. Standard 2.16(b) states, "suspension or reproval is appropriate for final conviction of a misdemeanor not involving moral turpitude but involving other misconduct warranting discipline."

Case law supports a reproval. In *In re Kelley* (1990) 52 Cal.3d 487, the court ordered a public reproval for an attorney who had twice been convicted of misdemeanor driving under the influence. The second driving under the influence conviction occurred while the attorney was on probation for the first driving under the influence conviction. *In the Matter of Buckley* (Review Dept. 1990) 1 Cal. State Bar Ct. Rptr. 201 is one of few published cases addressing misdemeanor sex convictions not involving moral turpitude. The attorney in *Buckley* was convicted of solicitation in violation of Penal Code section 647(a), the same crime as respondent. The court stated, "misdemeanor sex offenses which are not serious and are unrelated to the practice of law generally result in private reproval absent aggravating circumstances." (*Buckley, supra*, 1 Cal. State Bar Ct. Rptr. 201, 202.) The attorney in *Buckley* received a public reproval due to aggravating factors including a prior record of discipline (two previous private reprovals imposed eight and eleven years before the misconduct at issue) and the fact that the attorney was initially uncooperative with the arresting officer and lied about his occupation when booked.

Like the attorney in *Kelley*, respondent has been convicted of the same misdemeanor offense twice; however the gap between respondent's convictions is twelve years. Respondent was convicted of a misdemeanor sexual offense, the same offense as in *Buckley*. A private reproval is appropriate in light of respondent's mitigation for entering into a pretrial stipulation, having no record of prior discipline, and good character, whereas *Buckley* involved two past private reprovals and not even minimal mitigation.

EXCLUSION FROM MCLE CREDIT

Pursuant to rule 3201, respondent may <u>not</u> receive MCLE credit for completion of State Bar Ethics School. (Rules Proc. of State Bar, rule 3201.)

SIGNATURE OF THE PARTIES

By their signatures below, the parties and their counsel, as applicable, signify their agreement with each of the recitations and each of the terms and conditions of this Stipulation Re Facts, Conclusions of Law, and Disposition.

4/22/16	Mutory	Alexander Bakhache Perez	
Date	Respondent's Signature	Print Name	
4/28/16	A A A	Blithe C. Leece	
Dale	Respondent's Counsel Signature	Print Name	
4/28/16	Able	Alex Hackert	
Date	Deputy Trial Counsel's Signature	Print Name	

In the M	atter of: ANDER BAKHACHE PEREZ	Case Number(s): 15-C-12538-DFM
· · · · ·	- Parkers and -	
		REPROVAL ORDER
Finding thattached prejudice,	to the reproval, IT IS ORDERED t	lic and that the interests of Respondent will be served by any conditions hat the requested dismissal of counts/charges, if any, is GRANTED withou
[2	The stipulated facts and disp	osition are APPROVED AND THE REPROVAL IMPOSED.
	The stipulated facts and dispersion REPROVAL IMPOSED.	osition are APPROVED AS MODIFIED as set forth below, and the
	All court dates in the Hearing	Department are vacated.
within 15 o stipulation	days after service of this order, is	approved unless: 1) a motion to withdraw or modify the stipulation, filed granted; or 2) this court modifies or further modifies the approved f Procedure.) Otherwise the stipulation shall be effective 15 days after
Failure to	comply with any conditions att	tached to this reproval may constitute cause for a separate 0, Rules of Professional Conduct.
	5/2/11e	Amaeds Mo
Date		DONALD F. MILES Judge of the State Bar Court

CERTIFICATE OF SERVICE

[Rules Proc. of State Bar; Rule 5.27(B); Code Civ. Proc., § 1013a(4)]

I am a Case Administrator of the State Bar Court of California. I am over the age of eighteen and not a party to the within proceeding. Pursuant to standard court practice, in the City and County of Los Angeles, on May 2, 2016, I deposited a true copy of the following document(s):

STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND ORDER APPROVING

in a sealed envelope for collection and mailing on that date as follows:

by first-class mail, with postage thereon fully prepaid, through the United States Postal Service at Los Angeles, California, addressed as follows:

BLITHE C. LEECE LAW OFFICE OF BLITHE C. LEECE 21250 HAWTHORNE BLVD STE 500 TORRANCE, CA 90503

by interoffice mail through a facility regularly maintained by the State Bar of California addressed as follows:

ALEX HACKERT, Enforcement, Los Angeles

I hereby certify that the foregoing is true and correct. Executed in Los Angeles, California, on May 2, 2016.

Rose M. Luthi
Case Administrator
State Bar Court

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