



ORIGINAL

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**State Bar Court of California
Hearing Department
San Francisco
REPROVAL**

<p>Counsel For The State Bar</p> <p>Robin Brune Senior Trial Counsel 180 Howard Street San Francisco, California 94105 (415) 538-2218</p> <p>Bar # 149481</p>	<p>Case Number(s): 15-O-11186</p>	<p>For Court use only</p> <p>PUBLIC MATTER</p> <p>FILED</p> <p><i>[Signature]</i></p> <p>JAN 06 2016</p> <p>STATE BAR COURT CLERK'S OFFICE SAN FRANCISCO</p>
<p>Counsel For Respondent</p> <p>Mary Grace Guzman Fishkin & Slatter 575 Treat Blvd. Suite 215 Walnut Creek, California 94598 (925) 944-5600</p> <p>Bar # 269214</p>	<p>Submitted to: Settlement Judge</p> <p>STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND ORDER APPROVING</p> <p>PUBLIC REPROVAL</p> <p><input type="checkbox"/> PREVIOUS STIPULATION REJECTED</p>	
<p>In the Matter of:</p> <p>MARTA J. WEISS</p> <p>Bar # 193697</p> <p>A Member of the State Bar of California (Respondent)</p>		

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 18, 1997**.
- (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.

(Effective July 1, 2015)

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Reproval

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- (4) A statement of acts or omissions acknowledged by Respondent as cause or causes for discipline is included under "Facts."
- (5) Conclusions of law, drawn from and specifically referring to the facts are also included under "Conclusions of Law".
- (6) The parties must include supporting authority for the recommended level of discipline under the heading "Supporting Authority."
- (7) No more than 30 days prior to the filing of this stipulation, Respondent has been advised in writing of any pending investigation/proceeding not resolved by this stipulation, except for criminal investigations.
- (8) Payment of Disciplinary Costs—Respondent acknowledges the provisions of Bus. & Prof. Code §§6086.10 & 6140.7. (Check one option only):
- Costs are added to membership fee for calendar year following effective date of discipline (public reproof).
 - Case ineligible for costs (private reproof).
 - Costs are to be paid in equal amounts prior to February 1 for the following membership years: **three billing cycles following the effective date of the discipline**. (Hardship, special circumstances or other good cause per rule 5.132, Rules of Procedure.) If Respondent fails to pay any installment as described above, or as may be modified by the State Bar Court, the remaining balance is due and payable immediately.
 - Costs are waived in part as set forth in a separate attachment entitled "Partial Waiver of Costs".
 - Costs are entirely waived.
- (9) The parties understand that:
- (a) A private reproof 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 reproof 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) A private reproof 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 reproof 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.

B. Aggravating Circumstances [Standards for Attorney Sanctions for Professional Misconduct, standards 1.2(h) & 1.5]. Facts supporting aggravating circumstances are required.

- (1) **Prior 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:

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- (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".
- (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) **Indifference:** Respondent demonstrated indifference toward rectification of or atonement for the consequences of his or her misconduct.
- (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.

Additional aggravating circumstances:

C. Mitigating Circumstances [see standards 1.2(i) & 1.6]. Facts supporting mitigating circumstances 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.

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- (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. **See Attachment, p. 8.**
- (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.
- (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. **See Attachment, p. 8.**
- (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. **See Attachment, p. 8.**
- (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.

Additional mitigating circumstances:

Profiling Stipulation, See Attachment, p. 8.
No Prior Discipline, See Attachment, p.8.

D. Discipline:

- (1) **Private reproof (check applicable conditions, if any, below)**
- (a) Approved by the Court prior to initiation of the State Bar Court proceedings (no public disclosure).
- (b) Approved by the Court after initiation of the State Bar Court proceedings (public disclosure).

or

- (2) **Public reproof (Check applicable conditions, if any, below)**

E. Conditions Attached to Reproof:

- (1) Respondent must comply with the conditions attached to the reproof for a period of **one year**.
- (2) During the condition period attached to the reproof, Respondent must comply with the provisions of the State Bar Act and Rules of Professional Conduct.
- (3) 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 reproof. 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 reproof 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 reproof.
- (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) 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 reproof.

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No MPRE recommended. Reason:

(11) The following conditions are attached hereto and incorporated:

Substance Abuse Conditions

Law Office Management Conditions

Medical Conditions

Financial Conditions

F. Other Conditions Negotiated by the Parties:

ATTACHMENT TO
STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION

IN THE MATTER OF: MARTA J. WEISS

CASE NUMBER: 15-O-11186

FACTS AND CONCLUSIONS OF LAW.

Respondent admits that the following facts are true and that she is culpable of violations of the specified statutes and/or Rules of Professional Conduct.

Case No. 15-O-11186 (State Bar Investigation)

FACTS:

1. Pursuant to Business and Professions Code, section 6070 and Rules of the State Bar, rules 2.50 - 2.93 respondent was required to complete 25 hours of minimum continuing legal education ("MCLE") between February 1, 2011 and January 31, 2014 ("compliance period").
2. On October 20, 2013, respondent purchased a group selection of 25 courses from an MCLE provider.
3. On January 30, 2014, respondent reported to the State Bar, under penalty of perjury that she had completed all required hours of MCLE within the compliance period.
4. Although respondent had signed up for 25 MCLE courses in October, 2013, she had not actually taken any of the classes she had signed up for when she reported her compliance. Respondent recalled signing up for the classes and mistakenly believed she had completed the courses.
5. Respondent was grossly negligent in not confirming her recollection before she reported her compliance to the State Bar.
6. On July 7, 2014, the State Bar notified the respondent that she was selected for an audit and gave respondent until to August 21, 2014 to submit proof of MCLE compliance.
7. On August 6, 2014, respondent provided proof of compliance of 25 hours of MCLE credit to the State Bar. Respondent's proof of compliance consisted of 25 hours of MCLE credit that she completed between July 29, 2014 and August 6, 2014, after the compliance period.
8. On May 5 2015, respondent admitted her non-compliance to the State Bar.

CONCLUSIONS OF LAW:

9. By falsely reporting, under penalty of perjury, to the State Bar, that she had fully complied with her MCLE requirements when respondent was grossly negligent in not knowing that she had failed

to complete the MCLE requirements, respondent committed an act involving moral turpitude, in willful violation of Business and Professions Code, section 6106.

AGGRAVATING CIRCUMSTANCES.

There are no aggravating circumstances in this case.

MITIGATING CIRCUMSTANCES.

Candor/Cooperation (Std. 1.6(e)): Respondent readily admitted her misconduct to the State Bar.

Emotional/Physical Difficulties (Std. 1.6(d)): Respondent is disabled with an inoperable medical condition. Her physician confirmed she suffers from decreased strength, dizziness and fatigue. Respondent's husband's father passed away in November, 2013. In addition, respondent's mother became ill in November, 2013. Respondent flew back and forth to Michigan to care for her terminally ill mother, who passed away on March 30, 2014. On November 3, 2015, respondent's clinical psychologist provided an expert opinion that, at the time of the misconduct, respondent suffered from depression and anxiety due to the combination of respondent's medical condition and her parent's terminal illness, and that respondent's symptoms were exacerbated by stress and travel. On November 18, 2015, respondent's clinical psychologist provided a supplemental opinion confirming that he was aware of the nature of the disciplinary charges, and that he attributed the misconduct to the level of stress that respondent was experiencing. He stated, "Save for the extreme stress she was under, I find it hard to imagine her committing the kind of misconduct you attribute to her." The clinical psychologist further stated that the extreme stressors which affected the respondent are no longer as controlling. He stated, "It is unlikely that she will be the victim of any stressors of similar intensity to the ones she was subject to" and "I have no reason to believe she would be a threat to the public in her role as an attorney."

Additional Mitigating Circumstances:

Family Problems: Respondent's father-in-law passed away in November of 2013. In the same month, respondent's mother became terminally ill. Respondent traveled to Michigan to care for her mother, who passed away in March of 2014. From the period of November, 2013 through March of 2014, the respondent was pre-occupied with caring for her terminally ill mother.

Prefiling Stipulation: Respondent has entered into a stipulation as to facts and culpability prior to the filing of a Notice of Disciplinary Charges in the above-entitled disciplinary matter, thereby saving the State Bar Court time and resources. (*Silva-Vidor v. State Bar* (1989) 49 Cal.3d 1071, 1079 [where mitigative credit was given for entering into a stipulation as to facts and culpability].) In addition, by entering into this stipulation, respondent is accepting responsibility for her actions and trying to atone for her misconduct.

No Prior Record of Discipline: Respondent has been a member of the State Bar since December 18, 1997. Respondent has practiced law for over 17 years without a prior record of discipline when the misconduct herein occurred. (*Hawes v. State Bar* (1990) 51 Cal. 3d. 587,596 [more than ten years of discipline-free practice entitled to significant mitigation].)

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).)

The sanction applicable to Respondent’s misconduct is found in Standard 2.11, which applies to Respondent’s violation of Business and Professions Code, section 6106. Standard 2.11 specifies that disbarment or actual suspension is warranted for an act of moral turpitude.

Here, respondent’s misrepresentation, made under penalty of perjury, was an act of moral turpitude. Misrepresentations are compounded when made in writing under penalty of perjury, which includes an imprimatur of veracity which should place a reasonable person on notice to take care that their statement is accurate, complete and true. (*In the Matter of Maloney and Virsk* (Review Dept. 2005) 4 Cal. State Bar Ct. Rptr. 774,786.). When respondent stated under penalty of perjury on January 30, 2014 that she complied with her MCLE requirements of completing 25 hours of MCLE courses for the reporting period, respondent did not take sufficient steps to ascertain whether she was indeed in compliance with her MCLE requirements, and was grossly negligent in not knowing that she was not in compliance. Respondent’s misconduct pertaining to MCLE requirements circumvented the continuing legal educational requirements established for the purpose of enhancing attorney competence and protecting the public. For these reasons, respondent’s misconduct is serious, relates directly to the practice of law, and undermines public confidence in the profession.

In mitigation, respondent was suffering from extreme emotional and physical difficulties at the time of the misconduct, related to the respondent’s own incurable medical condition as well as respondent’s mother’s terminal illness. Respondent’s treating clinical psychologist provided an expert opinion that respondent’s misconduct is not likely to reoccur. In addition, respondent has no prior discipline, readily admitted her misconduct, and has entered into a stipulation prior to the filing of a Notice of Disciplinary

Charges. Further, respondent subsequently completed her MCLE credit hours, albeit outside the reporting period, after she was audited.

These factors suggest that respondent's misconduct was aberrational and indicate that respondent is amenable to rehabilitation and conforming her conduct to the ethical standards in the future. Therefore, a level of discipline below the standard of discipline set forth in Standard 2.11 is consistent with the purposes of imposing sanctions for attorney misconduct. A public reproof will adequately serve to protect the public confidence in the legal profession.

Case law also supports this result. *In the Matter of Yee* (Review Dept. 2014) 5 Cal. State Bar Ct. Rptr. 330, the attorney was found culpable of moral turpitude based on gross negligence in violation of Business and Professions code section 6106 when she affirmed that she had fulfilled her 25 hours of required MCLE credits when, in fact, she had not taken any courses during the relevant reporting period. The attorney mistakenly recalled that she had completed the courses, and did not check or maintain any records to confirm if her recollection was accurate. When she was randomly audited by the State Bar, she corrected her error and submitted proper proof of compliance. In *Yee* the Court found no aggravation and five factors in mitigation. In the present case, the respondent has no aggravating factors and five mitigating factors. One of the mitigating factors involves extreme emotional and physical difficulties which have now resolved. Accordingly, the same level of discipline than imposed in *Yee* is appropriate. A public reproof is adequate to protect the public and the profession.

COSTS OF DISCIPLINARY PROCEEDINGS.

Respondent acknowledges that the Office of Chief Trial Counsel has informed respondent that as of December 17, 2015, the prosecution costs in this matter are \$3,066.00. Respondent further acknowledges that should this stipulation be rejected or should relief from the stipulation be granted, the costs in this matter may increase due to the cost of further proceedings.

EXCLUSION FROM MCLE CREDIT



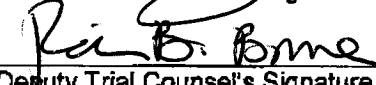
Pursuant to rule 3201, Respondent may not receive MCLE credit for completion of State Bar Ethics School, ordered as a condition of reproof or suspension. (Rules Proc. of State Bar, rule 3201.)

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In the Matter of: MARTA J. WEISS	Case number(s): 15-O-11186
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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.

<u>12-23-2015</u> Date	 Respondent's Signature	<u>MARTA J. WEISS</u> Print Name
<u>12/28/15</u> Date	 Respondent's Counsel Signature	<u>MARY GRACE GUZMAN</u> Print Name
<u>12/29/15</u> Date	 Deputy Trial Counsel's Signature	<u>ROBIN BRUNE</u> Print Name

(Do not write above this line.)

In the Matter of: MARTA J. WEISS	Case Number(s): 15-O-11186
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REPROVAL ORDER

Finding that the stipulation protects the public and that the interests of Respondent will be served by any conditions attached to the reproof, IT IS ORDERED that the requested dismissal of counts/charges, if any, is GRANTED without prejudice, and:

- The stipulated facts and disposition are APPROVED AND THE REPROVAL IMPOSED.
- The stipulated facts and disposition are APPROVED AS MODIFIED as set forth below, and the REPROVAL IMPOSED.
- All court dates in the Hearing Department are vacated.

1. On page 4 of the stipulation, the x in the box next to D(1) is deleted as this is not a private reproof.

The parties are bound by the stipulation as approved unless: 1) a motion to withdraw or modify the stipulation, filed within 15 days after service of this order, is granted; or 2) this court modifies or further modifies the approved stipulation. (See rule 5.58(E) & (F), Rules of Procedure.) **Otherwise the stipulation shall be effective 15 days after service of this order.**

Failure to comply with any conditions attached to this reproof may constitute cause for a separate proceeding for willful breach of rule 1-110, Rules of Professional Conduct.

Date Jan 6, 2016


PAT E. McELROY
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 San Francisco, on January 6, 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 San Francisco, California, addressed as follows:

MARY G. GUZMAN
FISHKIN & SLATTER, LLP
1575 TREAT BLVD STE 215
WALNUT CREEK, CA 94598

by certified mail, No. , with return receipt requested, through the United States Postal Service at , California, addressed as follows:

by overnight mail at , California, addressed as follows:


by fax transmission, at fax number . No error was reported by the fax machine that I used.

By personal service by leaving the documents in a sealed envelope or package clearly labeled to identify the attorney being served with a receptionist or a person having charge of the attorney's office, addressed as follows:

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

Robin Brune, Enforcement, San Francisco

I hereby certify that the foregoing is true and correct. Executed in San Francisco, California, on January 6, 2016.


Georgia Hue
Case Administrator
State Bar Court