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STATE BAR COURT
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LOS ANGELES

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STATE BAR COURT
HEARING DEPARTMENT – LOS ANGELES

In the Matter of
ROBYN LYNNETTE POOL
State Bar No. 218837
A Member of the State Bar of California.

) Case Nos.: 15-O-11503, 15-O-12483,
15-O-12561, 15-O-12679, and 15-O-12729

) RESPONDENT ROBYN L. POOL'S
RESPONSE TO THE STATE BAR'S
NOTICE OF DISCIPLINARY CHARGES

) Assigned to Judge W. Kearse McGill

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:



1 ROBYN LYNNETTE POOL (hereinafter "Respondent") hereby submits the
2 following Response to the State Bar's Disciplinary Charges:
3

4 **INTRODUCTION**
5

6 Respondent has not yet fully completed the investigation of facts relating to these
7 cases and has not yet fully completed discovery in this action and has not completed
8 preparation for trial. This Response to the State Bar's Disciplinary Charges is based
9 solely upon information and documents which are presently available to, and specifically
10 known by Respondent. It is anticipated that further discovery, independent investigation,
11 legal research and analysis will supply additional facts, add meaning to the known facts,
12 as well as establish entirely new factual conclusions and legal contentions, all of which
13 may lead to substantial additions to, changes in and variations from this Response to the
14 State Bar's Disciplinary Charges as herein set forth.
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17 The following Response to the State Bar's Disciplinary Charges is provided without
18 prejudice to the Respondent's right to produce evidence of any subsequently discovered
19 facts, documents or witnesses. If the Respondent obtains additional information or
20 documents, learns the identity of additional witnesses, or determines that it intends to call
21 additional witnesses to testify at the hearing of this matter, it will modify, amend, and/or
22 supplement this Response to the State Bar's Disciplinary Charges.
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24 **RESPONSE TO THE NOTICE OF DISCIPLINARY CHARGES**
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26 Subject to the matters set forth in the Introduction section above, Respondent
27 Robin L. Pool provides the following in Response to the State Bar's Disciplinary Charges:
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Jurisdiction

1. In response to the allegations set forth in paragraph 1 of the Notice of Disciplinary Charges, Respondent admits the allegations contained therein.

Case No. 15-O-11503

2. On December 6, 2014, Mr. Santa Cruz signed a fee agreement for \$6,000; On December 24, 2014, Quality Control completed; Loan package submitted; On February 25, 2015, Denied due to showing affordability (mortgage was current).
3. In response to the balance of the allegations set forth in paragraph 2 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.
4. In response to the allegations set forth in paragraph 3 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

Case No. 15-O-12483

5. On June 24, 2013, Mr. Fields stated he retained Respondent and paid \$7,500 for loan modification services. Fields accepted a loan modification for his first mortgage from his lender, effective February 4, 2014.
6. In response to the balance of the allegations set forth in paragraph 4 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.
7. In response to the allegations set forth in paragraph 5 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

1 Case No. 15-O-12561

- 2 8. On December 3, 2013, Raeann West-Williams signed a retainer agreement
3 agreeing to pay a retainer fee of \$5,500 for loan modification services; loan
4 modification packet was completed and submitted to the lender on January 27,
5 2014; (denied) and July 23, 2014 (resubmitted and denied October 29, 2014); On
6 December 19, 2014, West-Williams signed a second (litigation) retainer
7 agreement.
8
9 9. In response to the balance of the allegations set forth in paragraph 6 of the Notice
10 of Disciplinary Charges, Respondent denies the allegations contained therein
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12 10. In response the allegations set forth in paragraph 7 of the Notice of Disciplinary
13 Charges, Respondent denies the allegations contained therein.
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15 Case No. 15-O-12679

- 16 11. In response to the allegations set forth in paragraph 8 of the Notice of Disciplinary
17 Charges, Respondent denies the allegations contained therein.
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20 Case No. 15-O-12729

- 21 12. On November 19, 2014, Mendez's signed a fee agreement with the Pool Law
22 Group firm for an alleged amount of \$13,000.
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24 13. In response to the balance of the allegations set forth in paragraph 9 of the Notice
25 of Disciplinary Charges, Respondent denies the allegations contained therein.
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27 14. In response to the allegations set forth in paragraph 10 of the Notice of Disciplinary
28 Charges, Respondent denies the allegations contained therein.

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15. In response to the allegations set forth in paragraph 11 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

16. In response to the allegations set forth in paragraph 12 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

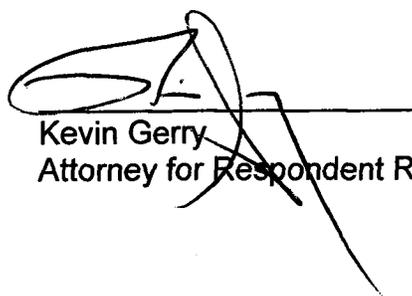
Case No. 15-O-12729

17. In response to the allegations set forth in paragraph 13 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

18. In response to the allegations set forth in paragraph 14 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

19. In response to the allegations set forth in paragraph 15 of the Notice of Disciplinary Charges, Respondent denies the allegations contained therein.

Dated: May 31, 2016



Kevin Gerry
Attorney for Respondent Robyn L. Pool

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3)
4 COUNTY OF LOS ANGELES)

5 I am over the age of 18 and not a party to the within entitled action. My business address is 711
6 N. Soledad Street, Santa Barbra, California 93103.

7 On May 31, 2016, I served a copy of the foregoing document described as:

8 **RESPONDENT ROBYN L. POOL'S RESPONSE TO THE
9 STATE BAR'S NOTICE OF DISCIPLINARY CHARGES**

10 on the interested parties in this action as follows:

11 William Todd
12 Deputy Trial Counsel
13 State Bar of California
14 845 S. Figueroa Street
15 Los Angeles, CA 90017

Hon. W. Kearse McGill
The State Bar Court
845 S. Figueroa Street
Third Floor
Los Angeles, CA 90017

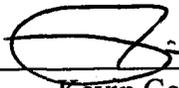
16 BY MAIL I caused such envelope(s) to be posted in the United States Mail at Los
17 Angeles, California, with postage thereon fully prepaid. I am readily familiar with the
18 firm's practice of collection and processing correspondence for mailing. It is deposited
19 with the United States Postal Service each day, and that practice was followed in the
20 ordinary course of business for the service herein attested to. [C.C.P. §1013(a)(3)].

21 BY PERSONAL SERVICE I caused such envelope(s) to be delivered by hand to
22 the offices of counsel for the interested parties.

23 STATE I declare under penalty of perjury under the laws of the State of
24 California that all of the foregoing is true and correct.

25 FEDERAL I declare that I am employed in the office of a member of the bar of
26 this court at whose direction the service was made.

27 Executed this 31st day of May 2016, at Santa Barbara, California.

28 
Kevin Gerry