

(Do not write above this line.)

State Bar Court of California
Hearing Department
Los Angeles
REPROVAL

NOT FOR PUBLICATION

CONFIDENTIAL

<p>Counsel For The State Bar</p> <p>Nina Sarraf-Yazdi Deputy Trial Counsel 845 South Figueroa Los Angeles, California 90017 (213) 765-1277</p> <p>Bar # 278877</p>	<p>Case Number(s): 15-O-11895</p>	<p>For Court use only</p> <p>FILED AUG 09 2016 P.B. STATE BAR COURT CLERK'S OFFICE LOS ANGELES</p>
<p>Counsel For Respondent</p> <p>David Carr 501 W Broadway Suite 601 San Diego, California 92101 (619) 239-8131</p> <p>Bar # 124510</p>	<p>Submitted to: Settlement Judge</p> <p>STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND ORDER APPROVING</p> <p>PRIVATE REPROVAL</p> <p><input type="checkbox"/> PREVIOUS STIPULATION REJECTED</p>	
<p>In the Matter of: RONALD VERA</p> <p>Bar # 60138</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 **June 18, 1974**.
- (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 **12** 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."



(Do not write above this line.)

- (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: (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:
 - (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."

(Do not write above this line.)

- (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.
- (3) **Candor/Cooperation:** Respondent displayed spontaneous candor and cooperation with the victims of his/her misconduct or to the State Bar during disciplinary investigation 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.

(Do not write above this line.)

- (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.

Additional mitigating circumstances:

No prior discipline, good character, pro bono work, candor and cooperation, family problems, remorse, and pretrial stipulation. See pages 8-9.

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.

(Do not write above this line.)

- (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 reprobation. Upon the direction of the Office of Probation, Respondent must meet with the probation deputy either in-person or by telephone. During the reprobation conditions period, 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 reprobation. 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 reprobation 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 reprobation with the probation monitor to establish a manner and schedule of compliance. During the reprobation conditions period, 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 reprobation.
- (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 reprobation.

No MPRE recommended. Reason: .

- (11) The following conditions are attached hereto and incorporated:
- | | |
|---|---|
| <input type="checkbox"/> Substance Abuse Conditions | <input type="checkbox"/> Law Office Management Conditions |
| <input type="checkbox"/> Medical Conditions | <input type="checkbox"/> Financial Conditions |

(Effective April 1, 2016)

Reprobation

ADDITIONAL FACTS RE MITIGATING CIRCUMSTANCES.

No Prior Discipline (Std. 1.6(a)): Respondent was admitted to practice on June 18, 1974. At the time of the misconduct, respondent had practiced law for approximately 40 years without a prior record of discipline, which would indicate that the underlying misconduct was aberrational and not likely to recur. Respondent is entitled to significant mitigation for practicing for a significant period of time without a record of discipline. (*Friedman v. State Bar* (1990) 50 Cal.3d 235, 245 [attorney entitled to strong mitigation for discipline free practice of 20 years]).

Pre-filing Stipulation: Respondent admitted to the misconduct and entered into this stipulation fully resolving this matter prior to the filing of a notice of disciplinary charges. Respondent's cooperation will save State Bar resources. Respondent's cooperation is a mitigating factor in this resolution. (*Silva-Vidor v. State Bar* (1989) 49 Cal.3d 1071, 1079 [mitigative credit given for entering into a stipulation as to facts and culpability].)

Good Character: Respondent provided eleven character reference letters from a wide array of the community, including several character letters from attorneys, all of which indicate that they know the details of the alleged misconduct. All of the character reference letters speak highly of respondent's character and generosity, and many make mention of his excellent legal work and professionalism. Several of the character reference letters make mention of having personal knowledge of his extensive work in the community and the toll his family situation has taken on him. The Standards allow mitigation in the form of a showing of good character if it is "attested to by a wide range of references in the legal and general communities, who are aware of the full extent of the misconduct." (Std. 1.6(f)) Additionally, significant consideration is given to attorney attestations of good character because they have a "strong interest in maintaining the host administration of justice." (*In the Matter of Brown* (Review Dept. 1993) 2 Cal. State Bar Ct. Rptr. 309, 319).

Pro Bono Work and Community Service: Pro bono and community service may mitigate an attorney's misconduct. (*Calvert v. State Bar* (1991) 54 Cal.3d 765, 785.) During this compliance period, he was a member of the Board of Directors for the Los Angeles County Fair Association, the Pomona Valley Medical Hospital Center and the California Community Foundation. Respondent has exhibited a clear dedication to both the legal and general communities over the past 40 years. He was a member of the State Bar Client Security Fund Commission from 1993-1997, and was the Chair of the Commission in 1996-1997. He was a member of the Los Angeles County Bar Association, Professional and Ethics Committee from 1987-1990. He also served as Interim Director of the Legal Aid Foundation for Los Angeles from 1996-1997. He was a Judge Pro Tem in Contra Costa County in 1985-1986. He has been serving on the Board of Directors for Pomona Valley Medical Center, a not-for-profit facility for 21 years. For the past 8 years, he has also served on the California Community Foundation, where he currently chairs the Program Committee overseeing 25 million dollars in annual donations to Los Angeles County. These factors entitle respondent to significant mitigation credit. (*In the Matter of John Young Sun* (Review Dept. 2013) 5 Cal. State Bar Ct. Rptr. 273 [extensive history of community service and pro bono work merited significant mitigation]).

Candor and Cooperation: Respondent admitted in his response to the State Bar, at an early stage of the proceedings, that he made a mistake in affirming compliance and that he regrets this lapse in judgment. Respondent is entitled to mitigative credit for admitting his culpability at an early stage in the investigation. (*In the Matter of Yee* (Review Dept. 2014) 5 Cal. State Bar Ct. Rptr. 330, 335 [mitigative credit given where respondent admitted her misconduct to the investigator before trial].)

Family Problems: In October 2013, respondent's son was hospitalized for internal bleeding in Florida. Simultaneously, respondent's 93 year old father suffered a serious fall in his home, followed by a stroke in mid-November 2013. Two weeks later respondent's father insisted that he wanted to be returned home. As a consequence, respondent was struggling to take care of his elderly parents and arrange in-home care for them. Additionally, respondent has another adult son who lives with him and suffers from paranoid schizophrenia. During this time, respondent's schizophrenic son displayed physical episodes requiring additional treatment and therapy. Finally, in January 2014, respondent learned that the three other attorneys that shared his office space with him would be leaving in May 2014. Respondent is entitled to mitigative credit for his family difficulties during the reporting period. (See *In the Matter of Heiner* (Review Dept. 1993) 2 Cal. State Bar Ct. Rptr. 559, 566 (attorney entitled to mitigation for personal problems including a difficult divorce and stress of being sole custodian for his three minor children..))

Remorse/Recognition of Wrongdoing: Respondent has acknowledged that he failed to accurately certify compliance with his MCLE requirements. Respondent submitted a declaration, under penalty of perjury, that he was committed to keeping better records of his MCLE compliance. This includes creating a calendaring system for himself, his office manager and his secretary to remind him of upcoming deadlines. He has also committed to completing his MCLE courses well in advance of his deadline in an effort to ensure that personal difficulties will not interfere with his ability to comply with the requirement again. (*In the Matter of Yee* (Review Dept. 2014) 5 Cal. State Bar Ct. Rptr. 330 [mitigative credit given for acknowledging insufficient record-keeping practices and changing them].)

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 Silvertown* (2005) 36 Cal.4th 81, 92, quoting *In re Brown* (1995) 12 Cal.4th 205, 220 and *In re Young, supra*, 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 mitigation 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).)

Standard 2.11 is the most severe Standard applicable to respondent's misconduct. Standard 2.11 provides, in pertinent part, that, "[d]isbarment or actual suspension is the presumed sanction for an act of moral turpitude, dishonesty, fraud, corruption, intentional or grossly negligent misrepresentation, or concealment of a material fact."

Here, respondent's grossly negligent misrepresentation made under penalty of perjury was a dishonest act involving moral turpitude. (*In the Matter of Yee* (Review Dept. 2014) 5 Cal. State Bar Ct. Rptr. 330.) 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 Virsik* (Review Dept. 2005) 4 Cal. State Bar Ct. Rptr. 774, 786.)

While Standard 2.11 calls for actual suspension, Standard 1.7(c) indicates that mitigating factors should be considered and may demonstrate the need for a lesser sanction than called for by the Standards. Respondent's misconduct circumvented the continuing legal educational requirements established for the purpose of enhancing attorney competence and protecting the public. Respondent failed to complete most of the required MCLE credits during the compliance period.

However, respondent's misconduct is significantly mitigated by his 40 years in practice without a record of discipline. Furthermore, respondent was suffering from family problems that directly contributed to his confusion related to his MCLE compliance. Respondent's family problems have since been resolved and responded has created a tracking method for his MCLE compliance to ensure the same mistake does not occur again. Additionally, respondent has presented evidence of good character and is entitled to mitigation for his community service and reputation in the community at all. Finally, respondent is also entitled to mitigation for entering into this pre-filing stipulation in which respondent has acknowledged his misconduct and saved State Bar time and resources. In light of the compelling mitigation an actual suspension is not required to fulfill the aims of the discipline process. A private reproof is appropriate to protect the public, the courts and the legal profession, to maintain high professional standards by attorneys, and to preserve public confidence in the legal profession.

Case law supports this level of discipline. In *In the Matter of Yee* (Review Dept. 2014) 5 Cal. State Bar Ct. Rptr. 330, Yee falsely stated under penalty of perjury that she had fulfilled her MCLE requirements. During a State Bar investigation, Yee was unable to produce any record of compliance. The Review Department found that a public reproof was adequate to "serve the goals of attorney discipline." (*Id.* at 11.) The Review Department held that Yee was grossly negligent in not reviewing her records before affirming MCLE compliance. The Review Department found strong mitigating factors, including Yee's ten and a half years of practice without discipline, exemplary record of pro bono and community service, and the absence of harm to the public or judicial system as Yee was not practicing law. (*Id.*) The Review Department found that the most significant mitigating factors were Yee's immediate acknowledgement of wrongdoing, decision to rectify the situation and implementation of a corrective plan to avoid future problems. (*Id.*)

Respondent has more mitigation than that afforded to Yee. In *Yee*, Yee was unable to produce any record of compliance. Here, respondent has produced proof of three hours of MCLE compliance within the required period. Additionally, Yee only had 10 and ½ years of discipline free practice, while respondent has approximately 40 years of discipline free practice. Further, respondent has also established that he has good character and through his community service has developed a positive reputation in the community at large. Similar to *Yee*, respondent immediately acknowledged his

wrongdoing, made a decision to rectify the situation and implanted a corrective plan to avoid future discipline. Therefore, discipline slightly less than that imposed in *Yee* is appropriate.

EXCLUSION FROM MCLE CREDIT

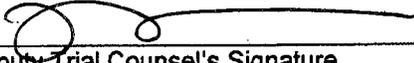
Pursuant to rule 3201, respondent may not receive MCLE credit for completion of State Bar Ethics School. (Rules Proc. of State Bar, rule 3201.)

(Do not write above this line.)

In the Matter of: RONALD VERA	Case number(s): 15-O-11895
----------------------------------	-------------------------------

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.

_____ Date	_____ Respondent's Signature	Ronald Vera Print Name
<u>7/21/16</u> Date	 Respondent's Counsel Signature	David Carr Print Name
<u>7/26/16</u> Date	 Deputy Trial Counsel's Signature	Nina Sarraf-Yazdi Print Name

(Do not write above this line.)

In the Matter of: RONALD VERA	Case Number(s): 15-O-11895
----------------------------------	-------------------------------

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, regarding additional mitigating circumstances, line 2, "pages 8-9" is deleted, and in its place is inserted "pages 7-8".
2. On page 5 of the Stipulation, an "X" is inserted in the box at paragraph E.(4) requiring respondent, within 30 days from the effective date of discipline, to contact the Office of Probation and schedule a meeting with his assigned probation deputy and to meet promptly with his probation deputy as directed and upon request during his reproof period.
3. On page 6 of the Stipulation, under "Facts and Conclusions of Law," line 1, "she" is deleted, and in its place is inserted "he" and "Case No. 15-O-14308" is deleted, and in its place is inserted "Case No. 15-O-11895".

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.

August 9, 2016
Date


REBECCA MEYER ROSENBERG, JUDGE PRO TEM
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 August 9, 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:

**DAVID C. CARR
KLINEDINST PC
501 W BROADWAY
STE 600
SAN DIEGO, CA 92101**

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

NINA SARRAF-YAZDI, Enforcement, Los Angeles

I hereby certify that the foregoing is true and correct. Executed in Los Angeles, California, on August 9, 2016.



Paul Barona
Case Administrator
State Bar Court