# PUBLIC MATTER

# State Bar Court of California Hearing Department San Francisco

# ORIGINAL

PUBLIC WATTER	ACTUAL SUSPENSION	
Counsel For The State Bar	Case Number(s): 15-0-11924-YDR	For Court use only
Jamie Kim Deputy Trial Counsel		
845 S. Figueroa St. Los Angeles, CA 90017		FILED
(213) 765-1182		JAN 12 2016
Bar # <b>281574</b>		STATE BAR COURT CLERK'S OFFICE
Counsel For Respondent		LOS ANGELES
John Campo Branson Brinkop Griffith & Campo, LLP 643 Bair Island Rd., # 400 Redwood City, CA 94063 (650) 365-7710		
(000,000 1110	Submitted to: Assigned Ju	ıdge
Bar # <b>157137</b>	STIPULATION RE FACTS, DISPOSITION AND ORDE	CONCLUSIONS OF LAW AND R APPROVING
In the Matter of: ANGELA LAUER POLK	ACTUAL SUSPENSION	
Bar # <b>157197</b>	☐ PREVIOUS STIPULATI	ON REJECTED
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 17, 1991**.
- (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 **13** 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 1	not writ	bove this line.)	
(5)	Co La	lusions of law, drawn from and specifically referring to the facts are also included under "Conclusion	ons of
(6)		parties must include supporting authority for the recommended level of discipline under the headin porting Authority."	9
(7)		ore than 30 days prior to the filing of this stipulation, Respondent has been advised in writing of an ng investigation/proceeding not resolved by this stipulation, except for criminal investigations.	ηy
(8)		ent of Disciplinary Costs—Respondent acknowledges the provisions of Bus. & Prof. Code §§60867. (Check one option only):	6.10 &
		Until costs are paid in full, Respondent will remain actually suspended from the practice of law un	less
		relief is obtained per rule 5.130, Rules of Procedure.  Costs are to be paid in equal amounts prior to February 1 for the following membership years: the billing cycles following the effective date of the Supreme Court order in this matter. (Hards special circumstances or other good cause per rule 5.132, Rules of Procedure.) If Respondent fa pay any installment as described above, or as may be modified by the State Bar Court, the remain balance is due and payable immediately.	ship, ails to
		Costs are waived in part as set forth in a separate attachment entitled "Partial Waiver of Costs". Costs are entirely waived.	
ı		vating Circumstances [Standards for Attorney Sanctions for Professional nduct, standards 1.2(h) & 1.5]. Facts supporting aggravating circumstances ed.	are
(1)	(a)	rior record of discipline 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.	
(2)		ntentional/Bad Faith/Dishonesty: Respondent's misconduct was dishonest, intentional, or surro y, or followed by bad faith.	ounded
(3)		lisrepresentation: Respondent's misconduct was surrounded by, or followed by, misrepresentat	ion.
(4)		oncealment: Respondent's misconduct was surrounded by, or followed by, concealment.	
(5)		verreaching: Respondent's misconduct was surrounded by, or followed by, overreaching.	
(6)		<b>ncharged Violations:</b> Respondent's conduct involves uncharged violations of the Business and rofessions Code, or the Rules of Professional Conduct.	

(Do n	ot write	e above this line.)
<b>(7)</b>		<b>Trust Violation:</b> 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)	$\boxtimes$	No aggravating circumstances are involved.
C. N	litig	al aggravating circumstances: ating Circumstances [see standards 1.2(i) & 1.6]. Facts supporting mitigating mstances are required.
(1)	$\boxtimes$	<b>No Prior Discipline:</b> Respondent has no prior record of discipline over many years of practice coupled with present misconduct which is not likely to recur. <b>See attachment, page 8.</b>
(2)		No Harm: Respondent did not harm the client, the public, or the administration of justice.
(3)		<b>Candor/Cooperation:</b> Respondent displayed spontaneous candor and cooperation with the victims of his/her misconduct or `to the State Bar during disciplinary investigations and proceedings.
(4)		<b>Remorse:</b> 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)		<b>Restitution:</b> Respondent paid \$ on in restitution to without the threat or force of disciplinary, civil or criminal proceedings.
(6)		<b>Delay:</b> 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)		<b>Emotional/Physical Difficulties:</b> 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

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			ct of any illegal conduct by the member, sucl abilities no longer pose a risk that Responde	n as illegal drug or substance abuse, and the difficulties nt will commit misconduct.
(9)		whic		onduct, Respondent suffered from severe financial stress foreseeable or which were beyond his/her control and .
(10)			y Problems: At the time of the misconduct, nal life which were other than emotional or pl	Respondent suffered extreme difficulties in his/her hysical in nature.
(11)			Character: Respondent's extraordinarily go legal and general communities who are awa	od character is attested to by a wide range of references e of the full extent of his/her misconduct.
(12)			<b>considerable time has passed sine</b> by convincing proof of subsequent rehabiled by convincing proof of subsequent rehabiled.	ce the acts of professional misconduct occurred itation.
(13)		No r	tigating circumstances are involved.	
Addi	tiona	al mit	ating circumstances:	
	P	re-tri:	Stipulation, see attachment, page 8.	
D. D	isci	plin		
(1)	$\boxtimes$	Stay	d Suspension:	
	(a)	$\boxtimes$	Respondent must be suspended from the pra	ctice of law for a period of <b>one year</b> .
		i.		factory to the State Bar Court of rehabilitation and and ability in the general law pursuant to standard ons for Professional Misconduct.
		ii.	and until Respondent pays restitution a this stipulation.	s set forth in the Financial Conditions form attached to
		iii.	and until Respondent does the following	g:
	(b)		he above-referenced suspension is stayed.	
(2)		Prob	tion:	
			nt must be placed on probation for a period or eme Court order in this matter. (See rule 9.1	one year, which will commence upon the effective date 8, California Rules of Court)
(3)	$\boxtimes$	Actu	Suspension:	
	(a)	$\boxtimes$	Respondent must be actually suspended from f 30 days.	the practice of law in the State of California for a period
		i.		factory to the State Bar Court of rehabilitation and and ability in the general law pursuant to standard ons for Professional Misconduct
		ii.	and until Respondent pays restitution as this stipulation.	s set forth in the Financial Conditions form attached to

(Do n	ot write	above	this line.)		
(10)		The f	following conditions are attached hereto ar	nd inco	rporated:
			Substance Abuse Conditions		Law Office Management Conditions
			Medical Conditions		Financial Conditions
F. C	ther	Cor	nditions Negotiated by the Parties	s:	
(1)		the Cor one <b>furt</b>	Multistate Professional Responsibility Exa reference of Bar Examiners, to the Office of eyear, whichever period is longer. Failure	mination  Proba  to pas	on: Respondent must provide proof of passage of on ("MPRE"), administered by the National tion during the period of actual suspension or within ss the MPRE results in actual suspension without by, California Rules of Court, and rule 5.162(A) &
			No MPRE recommended. Reason:		
(2)		Cali	ifornia Rules of Court, and perform the act	s speci	must comply with the requirements of rule <b>9.20</b> , ified in subdivisions (a) and (c) of that rule within 30 e date of the Supreme Court's Order in this matter.
(3)		day perf	s or more, he/she must comply with the re	quirem and (c)	If Respondent remains actually suspended for 90 ents of rule <b>9.20</b> , California Rules of Court, and of that rule within 120 and 130 calendar days, Court's Order in this matter.
(4)		peri	dit for Interim Suspension [conviction rough od of his/her interim suspension toward the immencement of interim suspension:	e <b>ferra</b> e stipu	I cases only]: Respondent will be credited for the lated period of actual suspension. Date of
(5)		Oth	er Conditions:		

## **ATTACHMENT TO**

## STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION

IN THE MATTER OF:

ANGELA LAUER POLK

CASE NUMBER:

15-O-11924-YDR

#### 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-11924 (State Bar Investigation)

#### **FACTS:**

- 1. As a member of the State Bar, respondent was required to complete 25 hours of minimum continuing legal education ("MCLE") during the period commencing on February 1, 2011, through January 31, 2014 (the "compliance period").
- 2. On February 6, 2014, respondent reported to the State Bar under penalty of perjury that she was in compliance with the MCLE requirements, and, in particular, that she had completed all of her MCLE during the compliance period.
- 3. In fact, respondent had completed 9.75 hours of MCLE courses before reporting compliance on February 6, 2014.
- 4. When respondent reported to the State Bar under penalty of perjury that she was in compliance with the MCLE requirements, respondent failed to review her records to determine whether she was in compliance with the MCLE requirements, which rendered respondent grossly negligent in not knowing that she had not completed all of the MCLE during the compliance period as required.
- 5. By August 21, 2014, respondent took additional MCLE courses necessary to come into compliance after being contacted by Member Records and Compliance regarding an MCLE audit.
- 6. On May 31, 2015, respondent ceased payment and use of the post-office box maintained as her official membership records address of the State Bar. Respondent, thereafter, failed to notify the State Bar of the change in respondent's address within 30 days. Respondent updated her official membership records of the State Bar on November 16, 2015 to reflect her then current address.

#### **CONCLUSIONS OF LAW:**

7. By reporting under penalty of perjury to the State Bar that she was in compliance with the MCLE requirements when she was grossly negligent in not knowing that she was not in compliance with the MCLE requirements, respondent committed an act of moral turpitude, dishonesty or corruption

in willful violation of Business and Professions Code section 6106.

8. By failing to notify the State Bar of the change in respondent's official membership records of the State Bar within 30 days after her official membership records address was no longer current, respondent engaged in a willful violation of Business and Professions Code section 6068(j).

#### ADDITIONAL FACTS RE MITIGATING CIRCUMSTANCES.

No Prior Discipline (Std. 1.6(a)): Respondent was admitted to practice on December 17, 1991. At the time of the misconduct, respondent had practiced law for more than 22 years without a record of discipline. While respondent's conduct is serious, her 22 years in practice without discipline indicates that the underlying conduct was aberrational and is not likely to recur. Respondent was inactive from August 16, 2007 to March 17, 2008 due to failure to pay membership fees. (Hawes v. State Bar (1990) 51 Cal.3d 587, 596 [gave attorney significant weight in mitigation for practicing law for over ten years without misconduct]; In the Matter of Riordan (Review Dept. 2007) 5 Cal. State Bar Ct. Rptr. 41 [discipline-free practice considered to be a significant mitigating factor even when misconduct is serious].)

**Pre-trial Stipulation:** Respondent admitted to the misconduct and entered into this stipulation fully resolving this matter without the necessity of a trial. 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 [where mitigative credit was given for entering into a stipulation as to facts and culpability].)

#### 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 most severe sanction applicable here is Standard 2.11, which applies to respondent's act of moral turpitude. Standard 2.11 states, "Disbarment or actual suspension is the presumed sanction for an act of moral turpitude, dishonesty, fraud, corruption or concealment of a material fact."

Here, respondent's misrepresentation made under penalty of perjury was grossly negligent and a dishonest act involving 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 Virsik* (Review Dept. 2005) 4 Cal. State Bar Ct. Rptr. 774, 786.) 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. She completed 9.75 hours of MCLE hours toward her 25-hour MCLE obligation during the compliance period. Respondent also engaged in the additional misconduct of failing to notify the State Bar of the change in her membership records address within 30 days.

In determining the length of suspension, a balancing of aggravation and mitigation is necessary. Respondent's misconduct is significantly mitigated by her 22 years in practice without a record of discipline, which indicates that respondent's misconduct here was an aberration not likely to be repeated. Respondent also cooperated with the State Bar by entering into the instant stipulation to fully resolve this matter prior to trial, which will save State Bar time and resources and is a demonstration of respondent's acknowledgement and acceptance of responsibility for her misconduct. There is no aggravation here.

In light of the significant mitigation, a one-year stayed suspension and a one-year probation with a 30-day actual suspension 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. (See Conroy v. State Bar (1991) 53 Cal.3d 495.)

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, but was unable to produce any record of compliance. The Review Department found that a public reproval was adequate to "serve the goals of attorney discipline" in light of Yee's gross negligence in not reviewing her records before affirming MCLE compliance and her reasonable, but mistaken, belief of compliance. (*Id.* at 11.) 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, the absence of harm to the public or judicial system as Yee was not practicing law, immediate acknowledgement of wrongdoing, decision to rectify the situation and implementation of a corrective plan to avoid future problems. (*Id.*)

Like in Yee, respondent's misconduct is significantly mitigated by her many years in practice without a record of discipline. Respondent has more than twice the number of years in practice without discipline than that in Yee. Respondent also acknowledged the instant misconduct by entering into a stipulation prior to trial. Unlike Yee, respondent was able to prove that she partially complied with her MCLE obligation by producing a record of 9.75 hours. Respondent, however, does not have the mitigation of an exemplary record of pro bono and community service and also has the additional misconduct of failing to notify the State Bar of the change in her official membership records within 30 days. In light

of respondent's partial compliance with the MCLE obligation, a 30-day actual suspension is appropriate to serve the purposes of discipline.

#### DISMISSALS.

The parties respectfully request the Court to dismiss the following alleged violations in the interest of justice:

Case No.	,	Count	Alleged Violation
15-O-11924		TWO	Business and Professions Code section 6068(i)

#### ADDITIONAL COUNT.

The parties respectfully request the Court to add the following alleged violation in the interest of justice:

Case No.	Count	Alleged Violation
15-O-11924	TWO	Business and Professions Code section 6068(j)

#### COSTS OF DISCIPLINARY PROCEEDINGS.

Respondent acknowledges that the Office of Chief Trial Counsel has informed respondent that as of December 22, 2015, the prosecution costs in this matter are \$3,584. 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 <u>not</u> receive MCLE credit for completion of State Bar Ethics School. (Rules Proc. of State Bar, rule 3201.)

in the Matter of: ANGELA LAUER P	OLK	Case number(s): 15-0-11924-YDR	
	SIGNA	TURE OF THE P	ARTIES
By their signatures be ecitations and each	elow, the parties and their of the terms and conditions	counsel, as applicable of this Stipulation Re	e, signify their agreement with each of the e Facts, Conclusions of Law, and Dispositio
12/29/15	Model		Angela Lauer Polk
Date	Respondent's Signa	ture	Print Name
			John Commo
Date	Respondent's Couns	sel Signature	John Campo Print Name
		<b>-</b>	
Date	Deputy Trial Counse	V- 0:	Jamie Kim Print Name
		-	

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In the Matter of: ANGELA LAUER POLK	Case number(s): 15-0-11924-YDR		
SIGNA	TURE OF THE PARTIES	3	
By their signatures below, the parties and their correctations and each of the terms and conditions	ounsel, as applicable, signify of this Stipulation Re Facts, C	their agreement will conclusions of Law	th each of the , and Disposition.
13/29/15 Older Date Respondent's Signat		ngela Lauer Polk	
12/21/15		Percane	
		ohn Campo rint Name	
Date Respondent's Couns			
Date Deputy Trial Counsel		amie Kim rint Name	
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(Effective July 1, 2015)			Signature Page

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PPIn the Matter of: ANGELA LAUER POLK	Case number(s): 15-O-11924-YDR	

## **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.

		Angela Lauer Polk	
Date	Respondent's Signature	Print Name	
		John Campo	
Date	Respondent's Counsel Signature	Print Name	
1/5/2016	Ommon -	_ Jamie Kim	
Date <sup>'</sup>	Deputy Trial Counsel's Signature	Print Name	

tion to be fair to the parties and th al of counts/charges, if any, is GR stipulated facts and disposition ar reme Court.	re APPROVED and the DISCIPLINE RECOMMENDED to the
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CIPLINE IS RECOMMENDED to t	
learing dates are vacated.	
ONAL FACTS RE MITIGATII	NG CIRCUMSTANCES.
e shall be modified to read as f	follows:
t's misconduct is serious, her 22 underlying conduct was aberra	2 years in practice without discipline without discipline ational and is not likely to recur.
r service of this order, is granted; of le 5.58(E) & (F), Rules of Procedu ourt order herein, normally 30 d	d unless: 1) a motion to withdraw or modify the stipulation, filed or 2) this court modifies or further modifies the approved ure.) The effective date of this disposition is the effective data days after file date. (See rule 9.18(a), California Rules of
it it	und by the stipulation as approved reservice of this order, is granted; le 5.58(E) & (F), Rules of Procedu tourt order herein, normally 30 cm.

#### 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 January 12, 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:

JOHN R. CAMPO BRANSON BRINKOP GRIFFITH & CAMPO, LLP 643 BAIR ISLAND RD # 400 REDWOOD CITY, CA 94063

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

JAMIE KIM, Enforcement, Los Angeles

I hereby certify that the foregoing is true and correct. Executed in Los Angeles California, on January 12, 2016.

Johnnie Lee Smith

Case Administrator

State Bar Court/