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7 Respondent, In Pro Per

**FILED**

**SEP 09 2016**

STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

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10 STATE BAR OF CALIFORNIA

11 HEARING DEPARTMENT LOS ANGELES

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13 In the Matter of:

14 MICHELE L. JACKSON

15 Member No.: 209841

16 A Member of the State Bar.  
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CASE NO. 15-O-13011 and 15-O-16012  
ANSWER TO THE STATE BAR'S NOTICE  
OF DISCIPLINARY CHARGES

21  
22 PRELIMINARY STATEMENT

23 Respondent, a plaintiff's attorney, took out two loans with two different lenders  
24 Modeso LLC and Lawsuit Funding Group. One loan was for \$20,000 and the other was  
25 for \$25,000). Lawsuit Funding Group has been paid in full, plus interest. The loan was  
26 taken out in March 2014 for \$20,000 and was repaid in the amount of \$33,532.63 (fees,  
27 costs and interests added to the \$20,000) on October 9, 2015.





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COUNT ONE

Case no. 15-O-13011

Business and Professions Code § 6101

[Moral Turpitude – Misrepresentations/Deceit]

2. Respondent denies that she made any representations under oath when she submitted the settlement agreement to Modeso, which agreement was submitted to Modeso via email attachment and denies any conclusions drawn by the State Bar based on this statement (i.e. if the conclusion of dishonesty, willful violation, moral turpitude or corruption are based on the statement that Respondent sent Modeso a settlement statement under oath, then those conclusions are also denied). Respondent lacks the information to admit or deny the basis on which Modeso advanced Respondent approximately \$25,000 to Respondent. Respondent had established a reliable loan and repayment history with Modeso and had also provided Modeso with information regarding the stability of the Defendant in the underlying action. Modeso could have made its decision based on any of the information provided by Respondent and Respondent denies any conclusions drawn by the State Bar based on this statement regarding Modeso’s state of mind (i.e. if the conclusion of dishonesty, moral turpitude, willful violation or corruption are based on the basis for Modeso’s decision). The remainder of the paragraph is admitted.

COUNT TWO

Case no. 15-O-13011

BUSINESS AND Professions Code § 6106

[Moral Turpitude – Misrepresentations to State Bar/Presentation of false documents]

3. Respondent denies that she ever presented any false settlement documents to the State Bar as authentic. On July 23, 2015, Respondent sent the State Bar a copy of all communications between Respondent and Modeso LLC as Exhibit 3 in response to the State Bar’s request for all such communications. In response to the State Bar’s request for settlement agreements in the *Garcia* case, Respondent sent the State Bar *only* the Settlement Agreement for \$2,500 as Exhibit 13 and no other settlement documents.

1 Respondent also denies this count in that the accusations are intelligible and the lines on  
2 page 3:1-3 do not state what exactly Respondent “falsely represented” to the State Bar, if  
3 anything. When Respondent responded to the State Bar on July 23, 2014 by letter, the  
4 State Bar had presented no charges of falsified settlement agreements to Respondent.  
5 Thus, Respondent made no statements about or denial of any such charges, because the  
6 State Bar had not made them yet. Respondent never said she had breached no duties by  
7 “submitting a falsified settlement agreement” because the State Bar had never ever raised  
8 the question of a falsified settlement agreement at that point in time. Respondent denies  
9 paragraph 3.

10 COUNT THREE

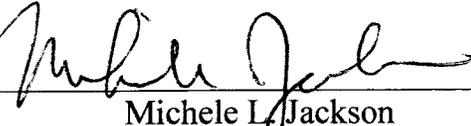
11  
12 Case No. 15-0-16012  
13 Business and Professions Code § 6106  
14 [Moral Turpitude – Misrepresentations Deceit]

15 4. Respondent submitted documents for consideration of a loan to Lawyers Funding  
16 Group LLC on February 25, 2014 in an email and did not do so under oath. Respondent  
17 denies any conclusions that the State Bar made (i.e. of moral turpitude, dishonesty or  
18 corruption and willful violation) based on the statement that settlement documents were  
19 presented on March 7, 2014 under oath. Respondent lacks the information or belief on  
20 which to state on what basis LFG advanced Respondent \$20,000. LFG routinely makes  
21 loans to attorneys with the slogan, “Legal funding for Plaintiffs and Lawyers. No risk! If  
22 you lose your case, you owe us nothing.” Respondent allowed LFG to take a lien on her  
23 cases, which lien was sufficient collateral for the loan and, as a result, LFG has since been  
24 paid in full for the \$20,000 loan plus an additional \$13,000. Respondent admits the  
25 remainder of this paragraph.  
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DATED: September 8, 2016

MICHELE L. JACKSON

By:   
Michele L. Jackson  
Respondent

**PROOF OF SERVICE**

I, Doris Frazier, declare as follows:

I am over the age of eighteen years and not a party to this action.

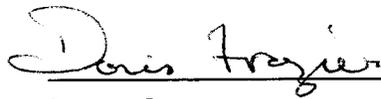
On September 8, 2016, I served a true and correct copy of the within document(s):

Answer to the State Bar's Notice of Disciplinary Charges  
-

- by **ELECTRONIC MAIL** by transmitting the document(s) listed above to the email address(es) set forth below in accordance with an agreement of counsel to accept electronic service of this document(s).
- by **PERSONAL DELIVERY**. I personally delivered the document(s) listed above, addressed as set forth below.
- by **FEDERAL EXPRESS** by depositing the document(s) listed above in a sealed package, with delivery charges fully prepaid, into the Federal Express delivery system, addressed as stated above, at \_\_\_\_\_, California.
- by **UNITED STATES FIRST CLASS MAIL** by depositing the document(s) listed above in a sealed package, with postage fully prepaid, into the United State Postal Service system, addressed as stated above, at Glendale, California.

Hugh Radigan, Enforcement Unit  
The State Bar of California  
Office of the Chief Trial Counsel  
845 S. Figueroa Street  
Los Angeles, CA 90017-2515

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

  
\_\_\_\_\_

[name]