

**PUBLIC MATTER**

**FILED**

1 STATE BAR OF CALIFORNIA  
2 OFFICE OF THE CHIEF TRIAL COUNSEL  
3 GREGORY P. DRESSER, No. 136532  
4 INTERIM CHIEF TRIAL COUNSEL  
5 RENE L. LUCARIC, No. 180005  
6 ASSISTANT CHIEF TRIAL COUNSEL  
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12 Los Angeles, California 90017-2515  
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AUG 23 2016  
STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

STATE BAR COURT  
HEARING DEPARTMENT - LOS ANGELES

In the Matter of: ) Case Nos. 15-O-13011 and 15-O-16012  
MICHELLE LYNN JACKSON, )  
No. 209841, ) NOTICE OF DISCIPLINARY CHARGES  
A Member of the State Bar )

**NOTICE - FAILURE TO RESPOND!**

**IF YOU FAIL TO FILE A WRITTEN ANSWER TO THIS NOTICE WITHIN 20 DAYS AFTER SERVICE, OR IF YOU FAIL TO APPEAR AT THE STATE BAR COURT TRIAL:**

- (1) YOUR DEFAULT WILL BE ENTERED;**
- (2) YOUR STATUS WILL BE CHANGED TO INACTIVE AND YOU WILL NOT BE PERMITTED TO PRACTICE LAW;**
- (3) YOU WILL NOT BE PERMITTED TO PARTICIPATE FURTHER IN THESE PROCEEDINGS UNLESS YOU MAKE A TIMELY MOTION AND THE DEFAULT IS SET ASIDE, AND;**
- (4) YOU SHALL BE SUBJECT TO ADDITIONAL DISCIPLINE. SPECIFICALLY, IF YOU FAIL TO TIMELY MOVE TO SET ASIDE OR VACATE YOUR DEFAULT, THIS COURT WILL ENTER AN ORDER RECOMMENDING YOUR DISBARMENT WITHOUT FURTHER HEARING OR PROCEEDING. SEE RULE 5.80 ET SEQ., RULES OF PROCEDURE OF THE STATE BAR OF CALIFORNIA.**



1 The State Bar of California alleges:

2 JURISDICTION

3 1. Michelle Lynn Jackson (“Respondent”) was admitted to the practice of law in the  
4 State of California on December 1, 2000, was a member at all times pertinent to these charges,  
5 and is currently a member of the State Bar of California.

6 COUNT ONE

7 Case No. 15-O-13011  
8 Business and Professions Code, section 6106  
[Moral Turpitude – Misrepresentations/Deceit]

9 2. On or about July 7, 2014, Respondent submitted a falsified settlement agreement to  
10 Modeso, LLC (“Modeso”) by which she falsely represented under oath that the civil case entitled  
11 *Garcia v. Comfort Keepers, et al.* in the Los Angeles Superior Court, Case No. BC486677 (“the  
12 civil case”) had settled for \$135,000, and that she would be entitled to receive \$54,000 in  
13 attorney fees from the case, when Respondent knew or was grossly negligent in not knowing the  
14 settlement agreement had not been executed by all parties, and that the case had not settled.  
15 Respondent submitted the falsified settlement agreement with forged signatures to Modeso with  
16 the intention of obtaining a personal loan in the form of a cash advance from Modeso in the  
17 approximate amount of \$25,000, and based upon her false representations to Modeso, Modeso  
18 advanced Respondent approximately \$25,000 on or about July 8, 2014. By these acts,  
19 Respondent thereby committed acts involving moral turpitude, dishonesty or corruption in  
20 willful violation of Business and Professions Code, section 6106.

21 COUNT TWO

22 Case No. 15-O-13011  
23 Business and Professions Code, section 6106  
[Moral Turpitude – Misrepresentation to State Bar/Presentation of false documents]

24 3. On or about July 23, 2014, Respondent stated in writing to a State Bar Investigator  
25 that she had neither breached any fiduciary duty owed to Modeso nor breached any other duties  
26 as an officer of the court by submitting a falsified settlement agreement to the State Bar which  
27 was submitted to Modeso, LLC (“Modeso”) by which she falsely represented that the civil case  
28

1 entitled *Garcia v. Comfort Keepers, et al.* in the Los Angeles Superior Court, Case No.  
2 BC486677, when Respondent knew or was grossly negligent in not knowing the statement(s)  
3 were false, and thereby committed an act involving moral turpitude, dishonesty or corruption in  
4 willful violation of Business and Professions Code, section 6106.

5 COUNT THREE

6 Case No. 15-O-16012  
7 Business and Professions Code, section 6106  
8 [Moral Turpitude – Misrepresentations/Deceit]

9 4. On or about March 7, 2014, Respondent submitted a falsified settlement agreement to  
10 Lawyers Funding Group LLC (hereinafter “LFG”) by which she falsely represented under oath  
11 that the civil case entitled *Curtis v. Strategic Sales*, Orange County Superior Court No. 30-2013-  
12 00652521 (hereinafter “the civil case”) had settled for \$150,000, and that she would be entitled  
13 to receive \$59,203 in attorney fees and costs from the case, when Respondent knew or was  
14 grossly negligent in not knowing the settlement agreement had not been executed by all parties,  
15 and that the case had not settled. Respondent submitted the falsified settlement agreement with  
16 forged signatures to LFG with the intention of obtaining a personal loan in the form of a cash  
17 advance from LFG in the approximate amount of \$20,000, and based upon her false  
18 representations to LFG, LFG advanced Respondent approximately \$20,000 on or about March  
19 25, 2014. By these acts, Respondent thereby committed acts involving moral turpitude,  
20 dishonesty or corruption in willful violation of Business and Professions Code, section 6106.

21 NOTICE - INACTIVE ENROLLMENT!

22 **YOU ARE HEREBY FURTHER NOTIFIED THAT IF THE STATE BAR**  
23 **COURT FINDS, PURSUANT TO BUSINESS AND PROFESSIONS CODE**  
24 **SECTION 6007(c), THAT YOUR CONDUCT POSES A SUBSTANTIAL**  
25 **THREAT OF HARM TO THE INTERESTS OF YOUR CLIENTS OR TO**  
26 **THE PUBLIC, YOU MAY BE INVOLUNTARILY ENROLLED AS AN**  
27 **INACTIVE MEMBER OF THE STATE BAR. YOUR INACTIVE**  
28 **ENROLLMENT WOULD BE IN ADDITION TO ANY DISCIPLINE**  
**RECOMMENDED BY THE COURT.**

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**NOTICE - COST ASSESSMENT!**

**IN THE EVENT THESE PROCEDURES RESULT IN PUBLIC DISCIPLINE, YOU MAY BE SUBJECT TO THE PAYMENT OF COSTS INCURRED BY THE STATE BAR IN THE INVESTIGATION, HEARING AND REVIEW OF THIS MATTER PURSUANT TO BUSINESS AND PROFESSIONS CODE SECTION 6086.10.**

Respectfully submitted,

THE STATE BAR OF CALIFORNIA  
OFFICE OF THE CHIEF TRIAL COUNSEL

DATED: August 22, 2016

By: Hugh G. Radigan  
Hugh G. Radigan  
Deputy Trial Counsel

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DECLARATION OF SERVICE

by

U.S. FIRST-CLASS MAIL / U.S. CERTIFIED MAIL / OVERNIGHT DELIVERY / FACSIMILE-ELECTRONIC TRANSMISSION

CASE NUMBER(s): 15-O-13011 and 15-O-16012

I, the undersigned, am over the age of eighteen (18) years and not a party to the within action, whose business address and place of employment is the State Bar of California, 845 South Figueroa Street, Los Angeles, CA 90017-2515, declare that:

- on the date shown below, I caused to be served a true copy of the within document described as follows:

NOTICE OF DISCIPLINARY CHARGES

By U.S. First-Class Mail: (CCP §§ 1013 and 1013(a)) - in accordance with the practice of the State Bar of California for collection and processing of mail, I deposited or placed for collection and mailing in the City and County of Los Angeles.

By U.S. Certified Mail: (CCP §§ 1013 and 1013(a))

By Overnight Delivery: (CCP §§ 1013(c) and 1013(d)) - I am readily familiar with the State Bar of California's practice for collection and processing of correspondence for overnight delivery by the United Parcel Service (UPS).

By Fax Transmission: (CCP §§ 1013(e) and 1013(f)) Based on agreement of the parties to accept service by fax transmission, I faxed the documents to the persons at the fax numbers listed herein below. No error was reported by the fax machine that I used. The original record of the fax transmission is retained on file and available upon request.

By Electronic Service: (CCP § 1010.6) Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the person(s) at the electronic addresses listed herein below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

(for U.S. First-Class Mail) in a sealed envelope placed for collection and mailing at Los Angeles, addressed to: (see below)

(for Certified Mail) in a sealed envelope placed for collection and mailing as certified mail, return receipt requested, Article No.: 9414 7266 9904 2010 0628 44 at Los Angeles, addressed to: (see below)

(for Overnight Delivery) together with a copy of this declaration, in an envelope, or package designated by UPS, Tracking No.: addressed to: (see below)

Table with 4 columns: Person Served, Business-Residential Address, Fax Number, and Courtesy Copy to. Row 1: Michele L. Jackson, 19200 Von Karman Ave Ste 400 Irvine, CA 92612, Electronic Address.

via inter-office mail regularly processed and maintained by the State Bar of California addressed to:

N/A

I am readily familiar with the State Bar of California's practice for collection and processing of correspondence for mailing with the United States Postal Service, and overnight delivery by the United Parcel Service (UPS). In the ordinary course of the State Bar of California's practice, correspondence collected and processed by the State Bar of California would be deposited with the United States Postal Service that same day, and for overnight delivery, deposited with delivery fees paid or provided for, with UPS that same day.

I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date on the envelope or package is more than one day after date of deposit for mailing contained in the affidavit.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed at Los Angeles, California, on the date shown below.

DATED: August 23, 2016

SIGNED: [Signature] JULI FINNILA Declarant