

FILED

**MAY 26 2016
STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES**

1 **JOSE ARTURO RODRIGUEZ, SBN 116541**
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In Pro Per

**STATE BAR COURT
HEARING DEPARTMENT - LOS ANGELES**

<p>In the matter of JOSE ARTURO RODRIGUEZ SBN 116541, A Member of the State Bar.</p>	<p>CASE NO. 15-0-13425 RESPONDENT'S ANSWER TO NOTICE OF DISCIPLINARY CHARGES</p>
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Jose Arturo Rodriguez responds as follows to the Notice of Disciplinary Charges filed on March 28, 2016 in the above-referenced matter:

JURISDICTION

1. I admit that I have been a member of the State Bar of California in good standing from my admission to the bar on December 28, 1984 and until the present and that the State Bar has jurisdiction over this matter.

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COUNT TWO

CASE NO. 15-0-13425

Business and Professions Code section 6068(o)(3)

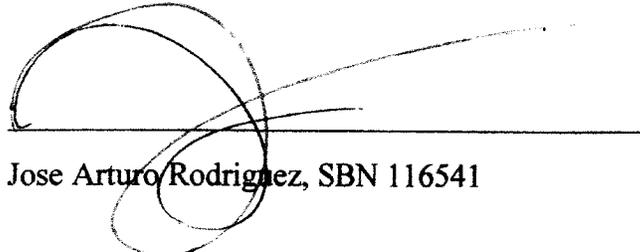
[Failure to Report Judicial Sanctions]

Respondent failed to report to the agency charged with attorney discipline, in writing, within 30 days of the time respondent had knowledge of the imposition of judicial sanctions against respondent by failing to report to the State Bar the \$3000 in sanctions the court imposed on respondent on April 15, 2014 in connection with *Javier Miramontes, et al. v. California Rural Legal Assistance, Inc., et al., Riverside County Superior Court No. INC 1302881*, in willful violation of Business and Professions Code, Section 6068(o)(3).

I admit that I failed to report the sanctions in a timely manner as required by section 6068(o)(3). I was not aware of the reporting requirement as I have never been sanctioned in my 31 year legal career, with this one exception. In mitigation, I immediately filed the necessary report once the matter was brought to my attention by the State Bar on August 14, 2014.

However, I believe that the sanctions imposed were without factual or legal support and thus, should never have been granted.

Respectfully submitted this 10th day of May 2016 at Coachella, California.



Jose Arturo Rodriguez, SBN 116541

ARTURO RODRIGUEZ
Attorney at law
11184426 N. Sienna Circle
Coachella, CA 92236
Tel: 760-698-8792
Cell: 760-238-2966
arodriguez2@dc.rr.com

January 15, 2014

VIA ELECTRONIC TRANSMISSION AND US MAIL

Ms. Jennifer K. Saunders
Ms. Blythe L. Golay
Haight Brown & Bonesteel, LLP
555 South Flower Street, Forty-Fifth Floor
Los Angeles, CA 90071

RE: *Miramontes, et al. v. CRLA, Inc., et al.*
Riverside County Case No. 1302881

Dear Ms. Saunders and Ms. Golay:

Ms. Saunders and Ms. Golay as you are aware, at the most recent hearing on December 20, 2013, the Honorable David M. Chapman sustained your demurrer and motion to strike subject to thirty (30) days leave to amend. By our calculations, the Third Amended Complaint (TAC) is due to be filed no later than January 21, 2014 (the 20th of January falls on Martin Luther King day, a court holiday.) Before calling the day's law and motion calendar that day, Judge Chapman introduced one of the newest Riverside County Superior Court judges recently appointed by Governor Brown, Superior Court Judge Sunshine Sykes.

Counsel, your defense of this case is partly premised on the following argument which you made to the Court in your demurrer to the Second Amended Complaint (SAC).

"Taking Plaintiffs' Complaint to its core, the allegations are nothing more than the personal vendetta of Mr. Rodriguez to retaliate against his former employer, CRLA, after he was terminated for, among other things, being verbally and physically abusive to other CRLA attorneys and employees. (See Workplace Violence Restraining Order, filed August 2, 2012, attached as Exhibit "B" to Request to take Judicial Notice. It is also important to note that defendant, Megan Beaman is one of the Protected Persons under said Order." (Demurrer to Plaintiffs' Complaint, page 1, lns. 8-13.)

First, as I have already argued to the Court in our opposition briefs, the TRO which CRLA obtained, was filed in June of 2012 and the injunction issued on August 2, 2012. The *Miramontes*

*Letter to Jennifer K. Saunders
Blythe L. Golay
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v. CRLA action is based on the events that transpired from March 27, 2012, when CRLA was presented with the Substitution of Attorneys forms, through May 21, 2012 when the Court denied CRLA's unauthorized motion and ordered the filing of the original Substitutions which had been served on CRLA two months earlier. The TRO has absolutely no relevance to the events of March 27, 2012 through May 21, 2012.

Counsel, in your request for Judicial Notice filed concurrently with your demurrer and motion to strike the FAC, you attached as Exhibit "B" Workplace Violence Restraining Order which CRLA included a declaration from Megan Beaman in support of the Order. In her declaration, Ms. Beaman makes the follows allegations under penalty of perjury:

"Arturo showed up a few days later at a status conference in Riverside in our case U.S. v. Harvey Duro, while on administrative leave, despite CRLA' direction to him that he not appear. During the hearing and at counsel's table Arturo passed me a staff profile of Sunshine Sykes at the counsel table. Ms Sykes is an individual with who I have had personal issues with for several years and who has threatened me in the past." Arturo is aware of the issues I have with her and used that information to aggravate me during the hearing. [Emphasis Added.] (This declaration was signed on June 21st, 2012.)

Approximately a year earlier on June 29, 2011, Megan sent two emails to all of the Coachella office staff and to our Supervising Attorney, Michel Meuter concerning then Riverside County Deputy Counsel Sunshine Sykes. The emails state as follows:

The first email read as follows:

"Dear Friends, I want to let you know that I have a sort of stalker that has threatened a lot of things including to call or visit my office in an effort to "destroy" me. She has also threatened to call Jose.¹ She is Mario's ex. I don't know what she thinks she can accomplish by calling CRLA as I have nothing to hide so I assume she might make up lies about me. I am telling all of you even though it is personal and embarrassing because she has escalated her threats lately and I'm not sure what she might be capable of doing. Of course, if she does do something I will do what I can to get a restraining order. But in the meantime, in case she calls or visits the office, I just want you to know what's going on. Also like always

¹
The reference to Jose, is to Jose Padilla, CRLA's Executive Director.

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Blythe L. Golay
January 15, 2014*

just tell callers I am "unavailable." I am working from home today for this reason. Mike or Arturo if there are further steps I should take now, please let me know. I don't care who I need to call; I am not protecting her identity, etc anymore and just want to prevent annoyance to CRLA if possible. Sorry for the hassle everyone."

The second email read as follows:

"PS her name is Sunshine Sykes, sometimes she lies and says Sunshine Martinez. She is also Riverside County Deputy Counsel (or whatever the hell they are called). I don't know what type of shenanigans to expect but any calls or anything that happens please let me know. Thank you everyone for understanding." (Copies of these two emails are attached as Exhibit A to this correspondence.)

MEGAN BEAMAN

Megan came to work for CRLA in September of 2008 as a staff attorney in our Coachella Office and was subsequently admitted to the California State bar in or about December of 2008 after passing the California State Bar exam. At the time that Megan started with CRLA, she had been married to her college sweetheart who moved with her to California from Wisconsin to allow Megan to work for CRLA. During her first year of employment, Megan was a dedicated, competent, hard working and appeared to have dedicated herself to her position as a CRLA staff attorney. Megan had been my first choice from among several applicants who had applied to fill the Coachella staff attorney position and my initial impression of Megan was that she was exceptionally bright, self-assured and teeming with self-confidence, spoke Spanish, and in my opinion, had as much or more promise than the majority of attorneys with whom I had worked with in the Coachella office.

In late August or early September of 2010, Megan came to my office in the morning. Megan was visually upset and crying. Megan had come to tell me that she had made a "horrible mistake," that she had "fallen in love" with her co-counsel Mario Martinez and had been having an affair with Mr. Martinez. Mario Martinez was a private attorney who was co-counseling with Megan on her first federal case, *EEOC v. Giumarra*. Megan went on say that Mr. Martinez' girlfriend, Sunshine Sykes, had found out about the affair and had told Megan that Ms. Sykes intended to call me and our Executive Director, Jose Padilla, to complain about the relationship and that Ms. Sykes "was out to destroy her". Megan, also stated that Ms. Sykes was not really married to Mario Martinez but nonetheless referred to herself as his "wife", that Ms. Sykes had emotional issues and refused to accept the fact that her relationship with Mario Martinez was over, that Ms. Sykes had been "stalking" Megan and had repeatedly threatened to "destroy" Megan. Megan admitted that she had made a "horrible" mistake by having had the affair with Mario Martinez and that she was afraid that

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disclosure of her relationship to Mario Martinez would ruin her career with CRLA. She also told me to expect a call from attorney Mario Martinez. I did in fact receive a call from Mr. Martinez later that day during which he admitted that the affair had been a "horrible" mistake and that he and Megan would understand if I removed Megan from the Giumarra matter. Both Megan and Mario Martinez asked me to leave Megan on the case and that the affair was "over" and that it would never happen again.

Shortly after my telephonic conversation with Mario Martinez, I received a call from Sunshine Sykes. Unfortunately, I was not in the office when the call came in and Ms. Sykes left a detailed message confirming that she had discovered that her husband Mario Martinez had been having an affair with Megan and that she thought it was highly unprofessional and that I should, at a minimum, remove Megan from the case. She also stated in her message that she had intended or had already called our central office in San Francisco to speak with CRLA executive director Jose Padilla.²

I did not return Ms. Sykes telephone call for the following reasons. First, Megan, Mr. Martinez and Ms. Sykes had all confirmed the existence of the affair. Second, Megan begged me not to pull her from the case and to not bring the matter to the attention of CRLA Executive Director Jose Padilla or other senior CRLA management. And of course that the affair had been a horrible mistake and she did not want her husband to find out as she did not want a divorce or separation.

As there was no dispute that the affair had happened, I thought that I did not need any further information from Ms. Sykes. The essential facts had been established, both Megan and Mario Martinez each gave me their assurance that the short term affair was over and each wanted to continue to work on the Giumarra case. Lastly, I considered the fact that Ms. Sykes was aware of Megan and Mr. Martinez' relationship and that she had demonstrated that she would have no problem informing me and/or CRLA if the relationship were to resume in the future. After much internal debate as to what I should do at this point, I made the decision to rely on and accept Megan and promises, as attorneys and Officers of the Court, that the relationship was over and informed them after some deliberation that I would not remove Megan from the case unless I was directed to do so from senior management. I take responsibility for this decision and received no communication from CRLA management on this issue.

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I did not hear from Mr. Padilla or any other CRLA senior manager and do not know if the message was received or if it had and been dismissed by Mr. Padilla or some other CRLA senior manager.

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In hindsight, I now know that I had made a mistake by not returning Ms. Sykes telephone call. Let me explain. When Megan made her "confession" about her affair with Mr. Martinez, she represented the following "facts" in part to explain why the affair had happened. First, Megan told me that Sunshine Sykes was "not really married" to Mr. Martinez and portrayed Ms. Sykes as Mario Martinez' "ex girlfriend" who sometimes referred to herself and Mario Martinez' wife. She implied that the affair had been short lived and that Ms. Sykes had only recently found out about the relationship and had gone ballistic spawning the slew of threats and intimidating actions. Megan did not mention or in any way imply that Ms. Sykes and Mr. Martinez had children together. Instead, Ms. Sykes was portrayed by Megan as a former "girlfriend" of Mr. Martinez' who just could not accept that her relationship had ended and that she would do "anything to "win Mr. Martinez back."

Approximately one year after the initial disclosures of the affair by Megan and Mario Martinez and Ms. Sykes, I had begun to suspect that Megan and Mario Martinez' relationship had or was regressing. My suspicions proved correct when I was informed by our supervising attorney, Michael Meuter, that he would be coming to Coachella (Mr. Meuter is based in our Salinas office) to meet with Megan, Mario Martinez and several attorneys from the federal Equal Employment Opportunity Commission (EEOC), CRLA's co-counsel in the *Giummara* case. The meeting, according to Mr. Meuter, was to discuss and attempt to resolve what Mr. Meuter described as "a strained relationship" with the EEOC attorneys and Megan and Mario Martinez.

The meeting, to my recollection, lasted a full day. During a break I confronted Megan and asked her if she and Mario Martinez had resumed their "relationship." Megan, smiled and said yes and added that she and Mr. Martinez "were taking it slow." I told Megan that it was unacceptable to me and that I would have to disclose her relationship to CRLA senior management beginning with our immediate supervisor, Michael Meuter and that I intended to recommend that she be immediately relieved of her responsibilities on *Giumarra*. Megan smiled and told me that she had already informed Mr. Meuter about her relationship with Mario Martinez and that Mr. Meuter had told her that he did not have a problem with it and that she would be allowed to remain on the *Giumarra* matter. Mr. Meuter was in our Coachella office that day and I asked to speak with him in the privacy of my office during a later break. I asked Mr. Meuter if it was true that Megan had informed him about her affair with Mario Martinez and that he had authorized her to continue working on the case. Mr. Meuter acknowledged that Megan had informed him about her relationship with Mario Martinez and that he did not see any problem with them continuing to work together on the case. I told Mr. Meuter in no uncertain terms that he was making a huge mistake. Both Megan and Mr. Martinez had lied to me a year earlier when each expressed remorse and each promised that the short-lived affair was over each of them admitting that it had been a huge mistake. I told Mr. Meuter that as far as I was concerned I had fulfilled my obligations as the Directing Attorney of the Coachella office and that Mr. Meuter was responsible to any consequences.

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Unfortunately, I did not initiate contact with Sunshine Sykes until after I had been terminated by CRLA on March 1, 2012. Shortly after my termination, I initiated contact with Ms. Sykes and spoke with her in a series of telephone conversations and in a meeting in Riverside. Ms. Sykes provided information which contradicted Megan's earlier representations to me about the circumstances of the affair. First, Ms. Sykes confirmed that she and Mario Martinez were in fact legally married. Furthermore, she and Mr. Martinez had three daughters together, and that she had been pregnant with their fourth child (another daughter) during the time that the affair had been ongoing. Ms. Sykes had learned of the affair from Mario Martinez' "private" email correspondence with Megan which Ms. Sykes had managed to access after having suspicions that the relationship between Megan and her husband was more than a professional working relationship. Ms. Sykes stated that the affair, as far as she could tell, had begun as early as February of 2010 and had been ongoing until Ms. Sykes discovery of the affair in late August or early September of 2010, a period of 7 to 8 months after she believed it had started. Over the course of our conversations, Ms. Sykes provided additional information which I will not discuss at this point but which highlighted Megan's inconsistencies with the story that she had initially told me about the affair.

I had provided some of this information to my former CRLA colleagues after I had been terminated by CRLA (and before the filing of this litigation) with the hope that they would conduct an investigation of Megan's odd and highly unprofessional conduct, particularly as it related to her highly inappropriate relationship with Mario Martinez and the defamatory lies and omissions that Megan had sprouted and decimated about Ms. Sykes within CRLA to "justify" her affair with Mario Martinez. None of my pleas were acted upon.

Counsel, I have endeavored to include enough substantive facts in the First and Second Amended complaints to survive your demurrers and motions to strike without providing all of the information discussed in this correspondence. At this point, I have an obligation to my clients to add some of the facts discussed in this correspondence in an attempt to save the causes of action for Breach of Fiduciary Duties, Intentional Infliction of Emotional Distress and Interference with Prospective Economic Advantage. If given no alternative, I will file the TAC on January 21, 2014.

I have practiced law almost exclusively in Riverside County since I moved to the Coachella Valley in 1987 to begin my employment with CRLA. As an attorney, my duties to my clients dictate that I bring some of these facts to the attention of the Court in order to survive the next demurrer and motions to strike the TAC. However, I am also an Officer of the Court and have a professional obligation not to bring disrespect to the Court. Also, I have the utmost respect for Judge Sunshine Sykes. Press accounts of Ms. Sykes appointment to the Riverside County bench have emphasized Ms. Sykes background. Judge Sykes is a graduate of Stanford University and of Stanford law

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school. She is a Native American (Navajo) and is the first Native American appointed as a judge in Riverside County. During my conversations with Ms. Sykes before her appointment to the bench, I was highly impressed by her professionalism, by her accomplishments as a Riverside Deputy County Counsel and, equally, as a mother of four young daughters. I have no desire to bring any negative publicity for Judge Sykes and am looking forward to her having a long productive career as a Superior Court Judge.

Counsel, we are requesting a 30 day extension, to and including February 1, 2014, by way of stipulation before filing the TAC. We intend to send courtesy copies of this correspondence to the Board of Directors of CRLA to suggest that we meet, at the earliest possible date, to discuss settlement options. We would insist that at least one Board representative, preferably an attorney, attend the settlement meeting.

Please reply to this correspondence at your earliest opportunity. If we cannot get the thirty day extension, we will only have three courses of action. The first and least preferable option, to file the TAC with added facts which we have outlined in this correspondence. The second choice, which we would much prefer, is to arrange a settlement meeting (at your Los Angeles offices if that is your preference) on the soonest possible date after stipulating to the thirty day extension to file the TAC. Our third option, will be to file an ex parte application to be heard by Judge Chapman, Judge Sykes newest judicial colleague, requesting that the Court grant the thirty day extension to file the TAC and to request input and guidance from the Court on how best to proceed with this litigation without the risk of potential negative publicity which would undoubtedly do little to advance the reputations of CRLA, Megan Beaman, Michael Meuter and Ilene Jacobs, the defendants in this action. Of course, we would also expect that the negative publicity would also harm Judge Sykes reputation as well.

Counsel, please let us know if you are willing to stipulate to the thirty day extension to file the TAC and schedule a settlement meeting, again with a least one Board representative, at the earliest possible opportunity. Time is of the essence. If we cannot resolve this matter as quickly as possible, you can either expect notice of an ex parte hearing to be held no later than next Tuesday requesting that the Court grant us the thirty day extension or that we proceed to file the TAC next Tuesday incorporating some of the facts stated in this correspondence.

Sincerely,

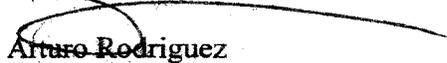

Arturo Rodriguez
Attorney for Plaintiffs

EXHIBIT A

Reply-To: mbeaman@crla.org
Subject: Personal and Confidential

Dear friends,

I want to let you know that I have a sort of staffer that has threatened a lot of things including to call or visit my office in an effort to "destroy" me. She has also threatened to call Jose. She is Mario's ex. I don't know what she thinks she can accomplish by calling CRLA as I have nothing to hide so I assume she might make up lies about me. I am telling all of you even though it is really personal and embarrassing because she has escalated her threats lately and I'm not sure what she might be capable of doing. Of course, if she does do something I will do what I can to get a restraining order. But in the meantime, in case she calls or visits the office, I just want you to know what's going on. Also like always just tell all callers I am "unavailable." I am working from home today for this reason.

Mike or Arturo if there are further steps I should take now, please let me know. I don't care who I need to tell. I'm not protecting her identity, etc anymore and just want to prevent annoyance to CRLA if possible.

Sorry for the hassle everyone.

Sent via BlackBerry from AT&T.

+++++

Megan Beaman

Staff Attorney

Migrant Farmworker Project

California Rural Legal Assistance

1460 6th Street

Coachella, CA 92236

760-398-7261

Sent via BlackBerry from AT&T.

+++++

Megan Beaman

Staff Attorney

Migrant Farmworker Project

California Rural Legal Assistance

1460 6th Street

Coachella, CA 92236

760-398-7261

-----Original Message-----

From: Megan Beaman

Sent: Wednesday, June 29, 2011 9:53 AM

To: Carmen Lopez-Rodriguez; Emanuel Benitez; Lorena Martinez; Laura Massie; Ruth Estrada; Cristina Mendez; Michael Meuter; Arturo Rodriguez

Subject: Re: Personal and Confidential

PS her name is Sunshine Sykes, sometimes she lies and says Sunshine Martinez. She is also Riverside County Deputy Counsel (or whatever the hell they are called). I don't know what type of shenanigans to expect but any calls or anything that happens please let me know.

Thank you everyone for understanding.

Sent via Blackberry from AT&T.

+++++

Megan Beaman

Staff Attorney

Migrant Farmworker Project

California Rural Legal Assistance

1460 6th Street

Coachella, CA 92236

760-398-7261

-----Original Message-----

From: mbeaman@crla.org

Date: Wed, 29 Jun 2011 16:00:05

To: <crodriguez@crla.org>; Emanuel Benitez <ebenitez@crla.org>;

Lorena <lmartinez@crla.org>; Laura Massie <lmassie@crla.org>; <restrada@crla.org>;

Cristina Mendes <cmendez@crla.org>; Mike Meuter <mmeuter@crla.org>; Arturo

Rodriguez <arrodriguez@crla.org>

8/3/2012

ARTURO RODRIGUEZ

Attorney at law

11184426 N. Sienna Circle

Coachella, CA 92236

Tel: 760-698-8792

Cell: 760-238-2966

arodriguez2@dc-rr.com

January 15, 2014

VIA ELECTRONIC TRANSMISSION AND US MAIL

Ms. Jennifer K. Saunders

Ms. Blythe L. Golay

Haight Brown & Bonesteel, LLP

555 South Flower Street, Forty-Fifth Floor

Los Angeles, CA 90071

RE: *Miramontes, et al. v. CRLA, Inc., et al.*

Riverside County Case No. 1302881

Dear Ms. Saunders and Ms. Golay:

Ms. Saunders and Ms. Golay as you are aware, at the most recent hearing on December 20, 2013, the Honorable David M. Chapman sustained your demurrer and motion to strike subject to thirty (30) days leave to amend. By our calculations, the Third Amended Complaint (TAC) is due to be filed no later than January 21, 2014 (the 20th of January falls on Martin Luther King day, a court holiday.)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Letter to Jennifer K. Saunders
Blythe L. Golay
January 15, 2014

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January 15, 2014

*Letter to Jennifer K. Saunders
Blythe L. Golay
January 15, 2014*

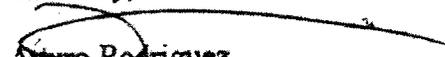
[REDACTED]

Counsel, we are requesting a 30 day extension, to and including February 1, 2014, by way of stipulation before filing the TAC. We intend to send courtesy copies of this correspondence to the Board of Directors of CRLA to suggest that we meet, at the earliest possible date, to discuss settlement options. We would insist that at least one Board representative, preferably an attorney, attend the settlement meeting.

Please reply to this correspondence at your earliest opportunity. If we cannot get the thirty day extension, we will only have three courses of action. The first and least preferable option, to file the TAC with added facts which we have outlined in this correspondence. The second choice, which we would much prefer, is to arrange a settlement meeting (at your Los Angeles offices if that is your preference) on the soonest possible date after stipulating to the thirty day extension to file the TAC. Our third option, will be to file an ex parte application to be heard by Judge Chapman, Judge Sykes newest judicial colleague, requesting that the Court grant the thirty day extension to file the TAC and to request input and guidance from the Court on how best to proceed with this litigation without the risk of potential negative publicity which would undoubtedly do little to advance the reputations of CRLA, Megan Beaman, Michael Meuter and Ilene Jacobs, the defendants in this action. Of course, we would also expect that the negative publicity would also harm Judge [REDACTED] reputation as well.

Counsel, please let us know if you are willing to stipulate to the thirty day extension to file the TAC and schedule a settlement meeting, again with a least one Board representative, at the earliest possible opportunity. Time is of the essence. If we cannot resolve this matter as quickly as possible, you can either expect notice of an ex parte hearing to be held no later than next Tuesday requesting that the Court grant us the thirty day extension or that we proceed to file the TAC next Tuesday incorporating some of the facts stated in this correspondence.

Sincerely,


Arturo Rodriguez
Attorney for Plaintiffs

1 **Proof of Service by Mail**

2
3 I, Carmen L. Rodriguez, declare that I am over the age of eighteen and not a party to this
4 action. My home address is 84311 Calendula Avenue, Coachella, CA 92236.

5 On May 24, 2016, I caused to be served a true and correct copy of the below listed
6 document(s) entitled:

7
8 **Respondent's Answer to Notice of Disciplinary Charges**

9 **Case No. 15-0-13425**

10
11 by first class United States mail addressed as follows:

12
13 Sherrell N. McFarlane
14 Deputy Trial Counsel
15 State Bar of California
16 845 S Figueroa Street
17 Los Angeles, CA 90017-2525

18 I deposited such documents in an envelope, postage prepaid, by depositing said envelope with
19 the United States Postal Service in Coachella, California.

20 I declare under penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct. Executed this 24th day of May 2016 at Coachella, California.

22
23 
24 Carmen L. Rodriguez