



1 **Robyn Pool, SBN 218837**  
2 *In pro per*  
3 5 Upper Newport Plaza  
4 Newport Beach, California 92660  
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**FILED**

**MAY 11 2016**

**STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES**

7 Respondent *in pro per*  
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11 **STATE BAR COURT**  
12 **HEARING DEPARTMENT – LOS ANGELES**  
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14 In the Matter of ) Case No(s): 15-O-14484, 14-O-14566 and  
15 ) 15-O-15296  
16 **ROBYN LYNNETTE POOL** )  
17 )  
18 No. 218837 ) **RESPONDENT ROBYN LYNNETTE**  
19 ) **POOL'S RESPONSES TO STATE BAR'S**  
20 ) **DISCIPLINARY CHARGES**  
21 A Member of the State Bar. )  
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29 Respondent **ROBYN LYNNETTE POOL** by and through her attorneys of record, hereby submits  
30 the following in response to the State Bar's Disciplinary Charges:

31 Respondent has not yet fully completed the investigation of facts relating to this case and has  
32 not yet fully completed discovery in this action and has not completed preparation for trial. All of  
33 the responses contained herein are based solely upon information and documents which are  
34 presently available to, and specifically known by Respondent. It is anticipated that further  
35 discovery, independent investigation, legal research and analysis will supply additional facts, add  
36 meaning to the known facts, as well as establish entirely new factual conclusions and legal  
37 contentions, all of which may lead to substantial additions to, changes in and variations from the  
38 responses herein set forth.

1 The following responses are provided without prejudice to Respondent's right to produce  
2 evidence of any subsequently discovered facts, documents or witnesses which these responding  
3 parties may later recall as well as additional documents which Respondent may later discover. The  
4 *documents produced herein are produced in good faith in an attempt to supply as much*  
5 documentation as is presently known and shall in no way prejudice Respondent in relation to further  
6 discovery and proceedings.

7 If the Respondent obtains additional information or documents which would be responsive to  
8 a Request, learns the identity of additional witnesses, or determines that it intends to call additional  
9 witnesses to testify at the hearing of this matter, it will modify, amend, and/or supplement these  
10 responses.

#### 11 **GENERAL OBJECTIONS**

12 Respondent objects to all requests for production to the extent that they purport to require  
13 that Respondent provide information not currently in Respondent's possession or control or which  
14 are already in the Department's possession or control.

15 Each response provided herein is subject to all appropriate objections, including, but not  
16 limited to, objections concerning relevancy, materiality, competency, issues of privilege, privacy,  
17 propriety and inadmissibility. All such objections are reserved and may be interposed at the time of  
18 trial or other hearing in this action.

#### 19 **RESPONSES**

20 Subject to the Preliminary Matters set forth above, Respondent provides the following  
21 responses:

22 **COUNT ONE:** Respondent provides the following information as it relates to the charges to  
23 the extent currently known:

24 15-O-14484

25 Rodriguez, Christina & Samuel; 974 Bussey St., San Bernardino, Ca:

- 26 - On January 27, 2015, Complainant signed retainer agreement (\$7,000).
- 27 - On May 10, 2016, all client financials were submitted to lender and Complainant  
28 received a trial loan modification lowering their payment \$100.

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- On June 2, 2015, client was unhappy with new monthly payment and file was resubmitted to the lender.

COUNT TWO: Respondent provides the following information as it relates to the charges to the extent currently known:

15-O-14484

- Complainant's file has been stolen by Keith Bray, Mike Moreno, and Daniel Benitez. Thus, Respondent has been unable to respond. Respondent has requested the file and been unable to obtain the file to date.

COUNT THREE: Respondent provides the following information as it relates to the charges to the extent currently known:

14-O-14566 Coglietti, Rickey and Rose; 25209 Vanessa Ct., Moreno Valley, Ca.:

- On July 14, 2015, Complainants signed retainer agreement (\$5,000).

COUNT FOUR: Respondent provides the following information as it relates to the charges to the extent currently known:

14-O-14566

- Complainants' file has been stolen by Keith Bray, Mike Moreno, and Daniel Benitez. Thus, Respondent has been unable to respond. Respondent has requested the file and been unable to obtain the file to date.

COUNT FIVE: Respondent provides the following information as it relates to the charges to the extent currently known:

15-O-15296

Ajeigbe, David and Ruth; 9872 Trade Post Rd., Lucerne Valley, Ca; and 32478 Sapphire Rd., Lucerne Valley, Ca:

- On September 27, 2014, Complainants signed retainer agreement (\$4,500 per home).



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**PROOF OF SERVICE**

STATE OF CALIFORNIA )  
 )  
COUNTY OF ORANGE ) ss

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within entitled action. My business address is 5 Upper Newport Plaza, Newport Beach, CA 92663.

On May 11, 2016, I served a copy of the foregoing document described as:

**RESPONDENT'S RESPONSES TO STATE BAR'S CHARGES**

on the interested parties in this action as follows:

William Todd	Hon. W. Kearse . McGill, Judge
Deputy Trial Counsel	The State Bar Court of California
State Bar of California	845 S. Figueroa Street
845 S. Figueroa Street	Los Angeles, CA 90017
Los Angeles, CA 90017	

BY MAIL I caused such envelope(s) to be posted in the United States Mail at Los Angeles, California, with postage thereon fully prepaid. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the United States Postal Service each day, and that practice was followed in the ordinary course of business for the service herein attested to. [C.C.P. §1013(a)(3)].

- BY FACSIMILE TRANSMISSION I caused the above document to be served via facsimile transmission by service to each party at their facsimile telephone number listed above.
- BY PERSONAL SERVICE I caused such envelope(s) to be delivered by hand to the offices of counsel for the interested parties.
- STATE I declare under penalty of perjury under the laws of the State of California that all of the foregoing is true and correct.
- FEDERAL I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed this 11<sup>th</sup> day of May 2016, at Los Angeles, California.

  
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ROBYN POOL