

PUBLIC MATTER

FILED

AUG 11 2016

STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

1 STATE BAR OF CALIFORNIA
 2 OFFICE OF CHIEF TRIAL COUNSEL
 3 GREGORY P. DRESSER, No. 136532
 4 INTERIM CHIEF TRIAL COUNSEL
 5 MELANIE J. LAWRENCE, No. 230102
 6 ACTING DEPUTY CHIEF TRIAL COUNSEL
 7 JOHN T. KELLEY, No. 193646
 8 ASSISTANT CHIEF TRIAL COUNSEL
 9 MICHAEL J. GLASS, No. 102700
 10 SUPERVISING SENIOR TRIAL COUNSEL
 11 WILLIAM TODD, No. 259194
 12 SENIOR TRIAL COUNSEL
 13 845 South Figueroa Street
 14 Los Angeles, California 90017-2515
 15 Telephone: (213) 765-1491

STATE BAR COURT

HEARING DEPARTMENT - LOS ANGELES

13 In the Matter of:) Case Nos. 15-O-15432; 15-O-15726;
 14) 15-O-15738; 15-O-15754; 16-O-10040;
 15 ROBYN LYNNETTE POOL,) 16-O-10076; 16-O-10094; 16-O-10095;
 16 No. 218837,) 16-O-10149; 16-O-10157; 16-O-10374;
 17) 16-O-10538; 16-O-10656; 16-O-11449
 18 A Member of the State Bar.) NOTICE OF DISCIPLINARY CHARGES

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. Robyn Pool ("respondent") was admitted to the practice of law in the State of
4 California on February 20, 2002, was a member at all times pertinent to these charges, and is
5 currently a member of the State Bar of California.

6 COUNT ONE

7 Case No. 15-O-15432
8 Business & Professions Code, section 6106.3
9 [Violation of Civil Code, section 2944.7(a)(1)-Illegal Advanced Fee]

10 2. On or about October 13, 2014, Respondent agreed to attempt to negotiate a mortgage
11 loan modification or other mortgage loan forbearance for a fee for a client, Antonio Serrato, and
12 thereafter between on or about October 17, 2014 and February 2, 2015, Respondent received
13 \$6,000 from the client before Respondent had fully performed each and every service
14 Respondent had been contracted to perform or represented to the client that Respondent would
15 perform, in violation of Civil Code, section 2944.7, and in willful violation of Business and
16 Professions Code, section 6106.3.

16 COUNT TWO

17 Case No. 15-O-15432
18 Rules of Professional Conduct, rule 3-700(A)(2)
19 [Improper Withdrawal from Employment]

20 3. Respondent failed, upon termination of employment, to take reasonable steps to avoid
21 reasonably foreseeable prejudice to Respondent's June 6, 2015, client Antonio Serrato
22 ("Serrato"), by terminating Respondent's employment on November 9, 2015 without taking any
23 action on the client's behalf after agreeing, on or about June 6, 2015, to litigate against the
24 client's lender, Fay Services, and thereafter failing to take reasonable steps to avoid reasonable
25 foreseeable prejudice to the client, in willful violation of Rules of Professional Conduct, rule 3-
26 700(A)(2).

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1 about July 6, 2015 any part of the \$6,000 fee to the client, in willful violation of Rules of
2 Professional Conduct, rule 3-700(D)(2).

3 COUNT NINE

4 Case No. 15-O-15726
5 Rules of Professional Conduct, rule 4-100(B)(3)
6 [Failure to Render Accounts of Client Funds]

7 10. Between on or about March 4, 2015 and July 6, 2015, Respondent received from
8 Respondent's clients, Martha Del Rio and Jose Vega, the sum of \$6,000 as advanced fees for
9 legal services to be performed. Respondent thereafter failed to render an appropriate accounting
10 to the client regarding those advanced fees upon the termination of Respondent's employment on
11 or about July 6, 2015, in willful violation of the Rules of Professional Conduct, rule 4-100(B)(3).

11 COUNT TEN

12 Case No. 15-O-15726
13 Rules of Professional Conduct, Rule 1-300(A)
14 [Aiding the Unauthorized Practice of Law]

15 11. From on or about March 4, 2015 through on or about July 6, 2015, Respondent aided
16 the employees of Apple Legal Support, who are not licensed to practice law in California, in the
17 unauthorized practice of law, by allowing them to give legal advice to clients, including the
18 recommendation to proceed with civil litigation, in willful violation of Rules of Professional
19 Conduct, rule 1-300(A).

19 COUNT ELEVEN

20 Case No. 15-O-15726
21 Business and Professions Code, section 6068(i)
22 [Failure to Cooperate in State Bar Investigation]

23 12. Respondent failed to cooperate and participate in a disciplinary investigation pending
24 against Respondent by failing to provide a substantive response to the State Bar's letters of
25 December 18, 2015, and January 11, 2016, which Respondent received, that requested
26 Respondent's response to the allegations of misconduct being investigated in case no. 15-O-
27 15726, in willful violation of Business and Professions Code, section 6068(i).
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COUNT TWELVE

Case No. 15-O-15738
Business & Professions Code, section 6106.3
[Violation of Civil Code, section 2944.7(a)(1)-Illegal Advanced Fee]

13. On or about November 22, 2014, Respondent agreed to negotiate a mortgage loan modification or other mortgage loan forbearance for a fee for client Antonio Lopez, and thereafter between November 25, 2014 and March 3, 2015 collected \$6,000 from the client before Respondent fully performed each and every service Respondent contracted to perform or represented to the client Respondent would perform, in violation of Civil Code, section 2944.7, and in willful violation of Business and Professions Code, section 6106.3.

COUNT THIRTEEN

Case No. 15-O-15738
Business and Professions Code, section 6068(i)
[Failure to Cooperate in State Bar Investigation]

14. Respondent failed to cooperate and participate in a disciplinary investigation pending against Respondent by failing to provide a substantive response to the State Bar's letters of December 21, 2015, and January 11, 2016, which Respondent received, that requested Respondent's response to the allegations of misconduct being investigated in case no. 15-O-15738, in willful violation of Business and Professions Code, section 6068(i).

COUNT FOURTEEN

Case No. 15-O-15754
Business and Professions Code, section 6103
[Failure to Obey a Court Order]

15. Respondent disobeyed or violated an order of the court requiring Respondent to do or forbear an act connected with or in the course of Respondent's profession, which Respondent ought in good faith to do or forbear, by failing to pay the \$3,550 in sanctions ordered payable by the respondent alone in the court's November 16, 2015 sanctions order in *McGriff v. Select Portfolio Servicing*, Riverside County Superior Court case no. RIC1507095, in willful violation of Business and Professions Code, section 6103.

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COUNT FIFTEEN

Case No. 15-O-15754
Business and Professions Code, section 6068(o)(3)
[Failure to Report Judicial Sanctions]

16. 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 \$3,555 in sanctions the court imposed on Respondent on or about November 16, 2015 in connection with *McGriff v. Select Portfolio Servicing, Inc.*, Riverside County Superior Court case no. RIC1507095, in willful violation of Business and Professions Code section, 6068(o)(3).

COUNT SIXTEEN

Case No. 15-O-15754
Business and Professions Code, section 6068(i)
[Failure to Cooperate in State Bar Investigation]

17. Respondent failed to cooperate and participate in a disciplinary investigation pending against Respondent by failing to provide a substantive response to the State Bar's letters of January 6, 2016, and January 25, 2016, which Respondent received, that requested Respondent's response to the allegations of misconduct being investigated in case no. 15-O-15754, in willful violation of Business and Professions Code, section 6068(i).

COUNT SEVENTEEN

Case No. 16-O-10040
Business & Professions Code, section 6106.3
[Violation of Civil Code, section 2944.7(a)(1)-Illegal Advanced Fee]

18. On or about November 26, 2014, Respondent agreed to negotiate a mortgage loan modification or other mortgage loan forbearance for a fee for client Maria Galeana, and thereafter between December 30, 2014, and February 26, 2015, collected \$4,000 from the client before Respondent fully performed each and every service Respondent contracted to perform or represented to the client Respondent would perform, in violation of Civil Code, section 2944.7, and in willful violation of Business and Professions Code, section 6106.3.

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COUNT TWENTY-ONE

Case No. 16-O-10076
Rules of Professional Conduct, rule 3-700(D)(2)
[Failure to Refund Unearned Fees]

22. On or about May 29, 2015, Respondent received advanced fees of \$1,000 from a client, Raquel Reyes Bazan (“Bazan”), for repair of Bazan’s credit history. Respondent failed to take any steps toward aiding Bazan with repair of Bazan’s credit history, or perform any legal services for Bazan, and therefore earned none of the advanced fees paid. Respondent failed to refund promptly, upon Respondent’s termination of employment on or about May 29, 2015, any part of the \$1,000 fee to the client, in willful violation of Rules of Professional Conduct, rule 3-700(D)(2).

COUNT TWENTY-TWO

Case No. 16-O-10094
Business & Professions Code, section 6106.3
[Violation of Civil Code, section 2944.7(a)(1)-Illegal Advanced Fee]

23. On or about January 28, 2015, Respondent agreed to negotiate a mortgage loan modification or other mortgage loan forbearance for a fee for client Salvador Hernandez, and thereafter between February 4, 2015, and May 4, 2015, collected \$5,000 from the client before Respondent fully performed each and every service Respondent contracted to perform or represented to the client Respondent would perform, in violation of Civil Code, section 2944.7, and in willful violation of Business and Professions Code, section 6106.3.

COUNT TWENTY-THREE

Case No. 16-O-10094
Business and Professions Code, section 6068(i)
[Failure to Cooperate in State Bar Investigation]

24. Respondent failed to cooperate and participate in a disciplinary investigation pending against Respondent by failing to provide a substantive response to the State Bar’s letters of January 22, 2016, and February 12, 2016, which Respondent received, that requested Respondent’s response to the allegations of misconduct being investigated in case no. 16-O-10094, in willful violation of Business and Professions Code, section 6068(i).

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COUNT TWENTY-FOUR

Case No. 16-O-10095
Rules of Professional Conduct, rule 3-700(A)(2)
[Improper Withdrawal from Employment]

25. Respondent failed, upon termination of employment, to take reasonable steps to avoid reasonably foreseeable prejudice to Respondent's client, Miguel Casillas ("Casillas"), by terminating Respondent's employment on or about October 29, 2015 by failing to take any action on the client's behalf after agreeing to litigate against the client's lender on or about May 16, 2015, and thereafter failing to inform the client that Respondent was withdrawing from employment, in willful violation of Rules of Professional Conduct, rule 3-700(A)(2).

COUNT TWENTY-FIVE

Case No. 16-O-10095
Rules of Professional Conduct, rule 3-700(D)(2)
[Failure to Refund Unearned Fees]

26. Between on or about May 16, 2015 and on or about September 10, 2015, Respondent received advanced fees of \$5,500 from a client, Miguel Casillas ("Casillas"), for civil litigation against Casillas's mortgage lender, Select Portfolio Servicing. Respondent failed to take any steps toward aiding Casillas with civil litigation against Casillas's mortgage lender, Select Portfolio Servicing, or to perform any legal services for Casillas, and therefore earned none of the advanced fees paid. Respondent failed to refund promptly, upon Respondent's termination of employment on or about October 29, 2015, any part of the \$5,500 fee to the client, in willful violation of Rules of Professional Conduct, rule 3-700(D)(2).

COUNT TWENTY-SIX

Case No. 16-O-10095
Rules of Professional Conduct, rule 4-100(B)(3)
[Failure to Render Accounts of Client Funds]

27. Between on or about May 18, 2015 and on or about September 10, 2015, Respondent received from Respondent's client, Miguel Casillas, the sum of \$5,500 as advanced fees for legal services to be performed. Respondent thereafter failed to render an appropriate accounting to the

1 client regarding those funds upon the termination of Respondent's employment on or about
2 October 29, 2015, in willful violation of the Rules of Professional Conduct, rule 4-100(B)(3).

3 COUNT TWENTY-SEVEN

4 Case No. 16-O-10095
5 Rules of Professional Conduct, Rule 1-300(A)
6 [Aiding the Unauthorized Practice of Law]

7 28. From on or about May 16, 2015 through on or about September 10, 2015, Respondent
8 aided the employees of Apple Legal Support, who are not licensed to practice law in California,
9 in the unauthorized practice of law, by allowing them to give legal advice to clients, including
10 the recommendation to proceed with civil litigation, in willful violation of Rules of Professional
11 Conduct, rule 1-300(A).

12 COUNT TWENTY-EIGHT

13 Case No. 16-O-10149
14 Business & Professions Code, section 6106.3
15 [Violation of Civil Code, section 2944.7(a)(1)-Illegal Advanced Fee]

16 29. On or about February 13, 2015, Respondent agreed to attempt to negotiate a mortgage
17 loan modification or other mortgage loan forbearance for a fee for a client, Jose Luis Gonzalez
18 Ochoa, and thereafter between on or about February 14, 2015, and on or about November 5,
19 2015, received \$15,000 from the client before Respondent had fully performed each and every
20 service Respondent had been contracted to perform or represented to the client that Respondent
21 would perform, in violation of Civil Code, section 2944.7, and in willful violation of Business
22 and Professions Code, section 6106.3.

23 COUNT TWENTY-NINE

24 Case No. 16-O-10149
25 Business and Professions Code, section 6068(i)
26 [Failure to Cooperate in State Bar Investigation]

27 30. Respondent failed to cooperate and participate in a disciplinary investigation pending
28 against Respondent by failing to provide a substantive response to the State Bar's letters of
February 2, 2016, and March 1, 2016, which Respondent received, that requested Respondent's

1 response to the allegations of misconduct being investigated in case no. 16-O-10149, in willful
2 violation of Business and Professions Code, section 6068(i).

3 COUNT THIRTY

4 Case No. 16-O-10157
5 Business & Professions Code, section 6106.3
6 [Violation of Civil Code, section 2944.7(a)(1)-Illegal Advanced Fee]

7 31. On or about March 21, 2015, agreed to attempt to negotiate a mortgage loan
8 modification or other mortgage loan forbearance for a fee for a client, Margarito Medina, and
9 thereafter between on or about March 24, 2015, and on or about September 8, 2015 received
10 \$6,000 from the client before Respondent had fully performed each and every service
11 Respondent had been contracted to perform or represented to the client that Respondent would
12 perform, in violation of Civil Code, section 2944.7, and in willful violation of Business and
13 Professions Code, section 6106.3.

14 COUNT THIRTY-ONE

15 Case No. 16-O-10157
16 Business and Professions Code, section 6068(i)
17 [Failure to Cooperate in State Bar Investigation]

18 32. Respondent failed to cooperate and participate in a disciplinary investigation pending
19 against Respondent by failing to provide a substantive response to the State Bar's letters of
20 February 11, 2016, and March 7, 2016, which Respondent received, that requested Respondent's
21 response to the allegations of misconduct being investigated in case no. 16-O-10157, in willful
22 violation of Business and Professions Code, section 6068(i).

23 COUNT THIRTY-TWO

24 Case No. 16-O-10374
25 Business & Professions Code, section 6106.3
26 [Violation of Civil Code, section 2944.7(a)(1)-Illegal Advanced Fee]

27 33. On or about March 21, 2015, Respondent agreed to negotiate a mortgage loan
28 modification or other mortgage loan forbearance for a fee for clients Jose Armas and Adriana
Navarro, and thereafter between March 21, 2015, and September 15, 2015, collected \$7,000
from the clients before Respondent fully performed each and every service Respondent

1 contracted to perform or represented to the clients Respondent would perform, in violation of
2 Civil Code, section 2944.7, and in willful violation of Business and Professions Code, section
3 6106.3.

4 COUNT THIRTY-THREE

5 Case No. 16-O-10374
6 Business and Professions Code, section 6068(i)
7 [Failure to Cooperate in State Bar Investigation]

8 34. Respondent failed to cooperate and participate in a disciplinary investigation pending
9 against Respondent by failing to provide a substantive response to the State Bar's letters of
10 February 11, 2016, and March 7, 2016, which Respondent received, that requested Respondent's
11 response to the allegations of misconduct being investigated in case no. 16-O-10374, in willful
12 violation of Business and Professions Code, section 6068(i).

13 COUNT THIRTY-FOUR

14 Case No. 16-O-10538
15 Business & Professions Code, section 6106.3
16 [Violation of Civil Code, section 2944.7(a)(1)-Illegal Advanced Fee]

17 35. On or about May 5, 2015, Respondent agreed to negotiate a mortgage loan
18 modification or other mortgage loan forbearance for a fee for client Jose Servin, and thereafter
19 between May 6, 2015 and July 6, 2015 collected \$5,000 from the client before Respondent fully
20 performed each and every service Respondent contracted to perform or represented to the client
21 Respondent would perform, in violation of Civil Code, section 2944.7, and in willful violation of
22 Business and Professions Code, section 6106.3.

23 COUNT THIRTY-FIVE

24 Case No. 16-O-10538
25 Business and Professions Code, section 6068(i)
26 [Failure to Cooperate in State Bar Investigation]

27 36. Respondent failed to cooperate and participate in a disciplinary investigation pending
28 against Respondent by failing to provide a substantive response to the State Bar's letters of
February 17, 2016, and March 10, 2016, which Respondent received, that requested

1 Respondent's response to the allegations of misconduct being investigated in case no. 16-O-
2 10538, in willful violation of Business and Professions Code, section 6068(i).

3 COUNT THIRTY-SIX

4 Case No. 16-O-10656
5 Business & Professions Code, section 6106.3
6 [Violation of Civil Code, section 2944.7(a)(1)-Illegal Advanced Fee]

7 37. On or about September 18, 2014, Respondent agreed to attempt to negotiate a
8 mortgage loan modification or other mortgage loan forbearance for a fee for a client Raquel E.
9 Velasquez, and thereafter between on or about September 23, 2014 and November 18, 2014
10 received \$5,000 from the client before Respondent had fully performed each and every service
11 Respondent had been contracted to perform or represented to the client that Respondent would
12 perform, in violation of Civil Code, section 2944.7, and in willful violation of Business and
13 Professions Code, section 6106.3.

14 COUNT THIRTY-SEVEN

15 Case No. 16-O-10656
16 Rules of Professional Conduct, rule 3-700(A)(2)
17 [Improper Withdrawal from Employment]

18 38. Respondent failed, upon termination of employment, to take reasonable steps to avoid
19 reasonably foreseeable prejudice to Respondent's client, Raquel E. Velasquez, by terminating
20 Respondent's employment on or about October 13, 2015 by failing to take any action on the
21 client's behalf after agreeing to litigate against the client's lender on or about March 12, 2015,
22 and thereafter failing to inform the client that Respondent was withdrawing from employment, in
23 willful violation of Rules of Professional Conduct, rule 3-700(A)(2).

24 COUNT THIRTY-EIGHT

25 Case No. 16-O-10656
26 Rules of Professional Conduct, rule 3-700(D)(2)
27 [Failure to Refund Unearned Fees]

28 39. Between on or about March 12, 2015 and October 13, 2015, Respondent received
advanced fees of \$7,000 from a client, Raquel E. Velasquez, in exchange for planned civil
litigation regarding wrongful foreclosure of Velasquez's home. Respondent failed to take any

1 steps consistent with the planned litigation, or to perform any legal services for the client, and
2 therefore earned none of the advanced fees paid. Respondent failed to refund promptly, upon
3 Respondent's termination of employment on or about October 13, 2015 any part of the \$7,000
4 fee to the client, in willful violation of Rules of Professional Conduct, rule 3-700(D)(2).

5 COUNT THIRTY-NINE

6 Case No. 16-O-10656
7 Rules of Professional Conduct, rule 4-100(B)(3)
8 [Failure to Render Accounts of Client Funds]

9 40. Between on or about March 12, 2015 and October 13, 2015, Respondent received
10 from Respondent's client, Raquel E. Velasquez, the sum of \$7,000 as advanced fees for legal
11 services to be performed. Respondent thereafter failed to render an appropriate accounting to the
12 client regarding those funds upon the termination of Respondent's employment on or about
13 October 13, 2015, in willful violation of the Rules of Professional Conduct, rule 4-100(B)(3).

14 COUNT FORTY

15 Case No. 16-O-10656
16 Rules of Professional Conduct, Rule 1-300(A)
17 [Aiding the Unauthorized Practice of Law]

18 41. From on or about March 12, 2015 through on or about October 13, 2015, Respondent
19 aided the employees of Apple Legal Support, who are not licensed to practice law in California,
20 in the unauthorized practice of law, by allowing them to give legal advice to clients, including
21 the recommendation to proceed with civil litigation, in willful violation of Rules of Professional
22 Conduct, rule 1-300(A).

23 COUNT FORTY-ONE

24 Case No. 16-O-10656
25 Business and Professions Code, section 6068(i)
26 [Failure to Cooperate in State Bar Investigation]

27 42. Respondent failed to cooperate and participate in a disciplinary investigation pending
28 against Respondent by failing to provide a substantive response to the State Bar's letters of
February 26, 2016, and March 17, 2016, which Respondent received, that requested

1 Respondent's response to the allegations of misconduct being investigated in case no. 16-O-
2 10656, in willful violation of Business and Professions Code, section 6068(i).

3 COUNT FORTY-TWO

4 Case No. 16-O-11449
5 Business & Professions Code, section 6106.3
6 [Violation of Civil Code, section 2944.7(a)(1)-Illegal Advanced Fee]

7 43. On or about April 11, 2015, Respondent agreed to attempt to negotiate a mortgage
8 loan modification or other mortgage loan forbearance for a fee for a client, Eduardo Rios, and
9 thereafter between on or about April 13, 2015 and September 11, 2015, Respondent received
10 \$8,000 from the client before Respondent had fully performed each and every service
11 Respondent had been contracted to perform or represented to the client that Respondent would
12 perform, in violation of Civil Code, section 2944.7, and in willful violation of Business and
13 Professions Code, section 6106.3.

14 NOTICE - INACTIVE ENROLLMENT!

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

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 CHIEF TRIAL COUNSEL



DATED: August 11, 2016

By: _____
William Todd
Senior 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-15432; et al

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, California 90017, 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))
By U.S. Certified Mail: (CCP §§ 1013 and 1013(a))
By Overnight Delivery: (CCP §§ 1013(c) and 1013(d))
By Fax Transmission: (CCP §§ 1013(e) and 1013(f))
By Electronic Service: (CCP § 1010.6)

(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 0662 93 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, Courtesy Copy to. Row 1: KEVIN GERRY, Kevin P. Gerry, 711 N Soledad St, Santa Barbara, CA 93103, 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').

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 11, 2016

SIGNED: Laura Jett
Laura Jett
Declarant