

PUBLIC MATTER

1 STATE BAR OF CALIFORNIA
 OFFICE OF CHIEF TRIAL COUNSEL
 2 GREGORY P. DRESSER, No. 136532
 INTERIM CHIEF TRIAL COUNSEL
 3 MELANIE J. LAWRENCE, No. 230102
 ACTING DEPUTY CHIEF TRIAL COUNSEL
 4 JOHN T. KELLEY, No. 193646
 ASSISTANT CHIEF TRIAL COUNSEL
 5 BROOKE A. SCHAFER, No. 194824
 SUPERVISING SENIOR TRIAL COUNSEL
 6 ALEX HACKERT, No. 267342
 DEPUTY TRIAL COUNSEL
 7 845 South Figueroa Street
 Los Angeles, California 90017-2515
 8 Telephone: (213) 765-1498

FILED
OCT 17 2016
 STATE BAR COURT
 CLERK'S OFFICE
 LOS ANGELES

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STATE BAR COURT
 HEARING DEPARTMENT - LOS ANGELES

In the Matter of:) Case No. 16-O-12117
 JACQUELINE A. MANGUM,)
 No. 114066,) 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.

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1 The State Bar of California alleges:

2 JURISDICTION

3 1. Jacqueline A. Mangum ("respondent") was admitted to the practice of law in the State
4 of California on July 16, 1984, 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. 16-O-12117
8 Rules of Professional Conduct, rule 3-110(A)
[Failure to Perform with Competence]

9 2. In or about April 2011, Nancy Storti employed respondent to perform legal services,
10 namely pursue a claim for employment discrimination. As part of respondent's representation, on
11 or about April 24, 2014, respondent filed a civil complaint on behalf of the client, *Storti v.*
12 *Valleycare Olive View-UCLA Medical Center and Health Center, et al.*, Los Angeles Superior
13 Court case no. BC543375, in which respondent intentionally, recklessly, or repeatedly failed to
14 perform legal services with competence, by failing to timely file an opposition to the defendants'
15 demurrer to the amended complaint, failing to take any action to attempt to rectify the court's
16 sustaining of said demurrer and dismissal of the amended complaint with prejudice, and
17 thereafter effectively abandoning the client, in willful violation of Rules of Professional Conduct,
18 rule 3-110(A).

19 COUNT TWO

20 Case No. 16-O-12117
21 Business and Professions Code, section 6068(m)
[Failure to Inform Client of Significant Development]

22 3. Respondent failed to keep respondent's client, Nancy Storti, reasonably informed of
23 significant developments in a matter in which respondent had agreed to provide legal services,
24 by failing to inform the client of the following: on January 22, 2015 the court in *Storti v.*
25 *Valleycare Olive View-UCLA Medical Center and Health Center, et al.*, Los Angeles Superior
26 Court case no. BC543375, issued a ruling on the defendants' demurrer, dismissing the amended
27 complaint filed by respondent on behalf of Storti, with prejudice, in willful violation of Business
28 and Professions Code, section 6068(m).

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COUNT THREE

Case No. 16-O-12117
Rules of Professional Conduct, rule 4-100(B)(3)
[Failure to Render Accounts of Client Funds]

4. In or about 2012 through 2015, respondent received from respondent's client, Nancy Storti, the total sum of \$17,600 as advanced fees for legal services to be performed. Respondent thereafter failed to render an appropriate accounting to the client regarding those funds following the client's request for such accounting in or about February 2015 and upon the termination of respondent's employment in or about February 2015, in willful violation of the Rules of Professional Conduct, rule 4-100(B)(3).

COUNT FOUR

Case No. 16-O-12117
Business and Professions Code, section 6068(i)
[Failure to Cooperate in State Bar Investigation]

5. 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 letter of July 18, 2016, which respondent received, that requested respondent's response to the allegations of misconduct being investigated in case no. 16-O-12117, in willful violation of Business and Professions Code, section 6068(i).

COUNT FIVE

Case No. 16-O-12117
Business and Professions Code, section 6068(j)
[Failure to Update Membership Address]

6. Prior to on or about May 17, 2016, respondent vacated respondent's office at the address maintained on the official membership records of the State Bar and thereafter failed to comply with the requirements of Business and Professions Code section 6002.1, by failing to notify the State Bar of the change in respondent's address within 30 days, in willful violation of Business and Professions Code, section 6068(j).

NOTICE - INACTIVE ENROLLMENT!

YOU ARE HEREBY FURTHER NOTIFIED THAT IF THE STATE BAR COURT FINDS, PURSUANT TO BUSINESS AND PROFESSIONS CODE SECTION 6007(c), THAT YOUR CONDUCT POSES A SUBSTANTIAL

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THREAT OF HARM TO THE INTERESTS OF YOUR CLIENTS OR TO THE PUBLIC, YOU MAY BE INVOLUNTARILY ENROLLED AS AN INACTIVE MEMBER OF THE STATE BAR. YOUR INACTIVE ENROLLMENT WOULD BE IN ADDITION TO ANY DISCIPLINE RECOMMENDED BY THE COURT.

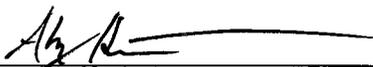
NOTICE - COST ASSESSMENT!

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: October 17, 2016

By: 
Alex Hackert
Deputy Trial Counsel

DECLARATION OF SERVICE

CASE NUMBER(s): 16-O-12117

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 0754 55 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 via U.S. Certified Mail. Includes contact information for Jacqueline A. Mangum.

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: October 17, 2016

SIGNED:

Natalie Flores signature and name: NATALIE FLORES Declarant