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# PUBLIC MATTER

FILED

DEC - 5 2016

STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

STATE BAR COURT

HEARING DEPARTMENT - LOS ANGELES

13 In the Matter of: ) Case No. 16-O-13988  
14 HEATHER JUNE CHRISTIANSEN )  
STANLEY, ) NOTICE OF DISCIPLINARY CHARGES  
15 No. 185108, )  
16 )  
A Member of the State Bar.

## NOTICE - FAILURE TO RESPOND!

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

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



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The State Bar of California alleges:

JURISDICTION

1. Heather June Christiansen Stanley ("Respondent") was admitted to the practice of law in the State of California on December 6, 1996, was a member at all times pertinent to these charges, and is currently a member of the State Bar of California.

COUNT ONE

Case No. 16-O-13988  
Rules of Professional Conduct, rule 4-100(A)  
[Failure to Deposit Client Funds in Trust Account]

2. On or about August 5, 2010 and May 2, 2011, Respondent received on behalf of Respondent's client, Cynthia Bangi, two checks – one for \$400,000 and one for \$652,311.57. Respondent failed to deposit the \$1,052,311.57 in funds received for the benefit of a client in a bank account labeled "Trust Account," "Client Funds Account," or words of similar import in willful violation of Rules of Professional Conduct, rule 4-100(A).

COUNT TWO

Case No. 16-O-13988  
Rules of Professional Conduct, rule 4-100(B)(3)  
[Failure to Account]

3. On or about August 5, 2010 and May 2, 2011, Respondent received on behalf of Respondent's client, Cynthia Bangi, two checks totaling \$1,052,311.57 to be held in trust for the benefit of the client. Respondent thereafter failed to render an appropriate accounting to the client regarding those funds following the client's requests for such accounting on June 12, 2012, July 16, 2015, January 5, 2016, March 18, 2016, March 27, 2016, April 15, 2016, May 11, 2016, and May 31, 2016, in willful violation of the Rules of Professional Conduct, rule 4-100(B)(3).

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COUNT THREE

Case No. 16-O-13988  
Business and Professions Code, section 6106  
[Moral Turpitude - Misappropriation]

4. On or about August 5, 2010 and May 2, 2011, Respondent received on behalf of Respondent's client, Cynthia Bangi, two checks totaling \$1,052,311.57 to be held in trust for the benefit of the client. Respondent deposited the two checks into a bank account controlled by Respondent at Kern Schools Federal Credit Union, account number XXXXXX0970 on behalf of the client. Between July 25, 2013 and November 14, 2013, Respondent dishonestly or grossly negligently misappropriated for Respondent's own purposes \$955,000 that Respondent's client was entitled to receive and thereby committed an act involving moral turpitude, dishonesty, or corruption in willful violation of Business and Professions Code, section 6106.

COUNT FOUR

Case No. 16-O-13988  
Rules of Professional Conduct, rule 4-100(A)  
[Failure to Maintain Client Funds]

5. On or about August 5, 2010 and May 2, 2011, Respondent received on behalf of Respondent's client, Cynthia Bangi, two checks totaling \$1,052,311.57 to be held in trust for the benefit of the client. Respondent deposited the two checks into a bank account controlled by Respondent at Kern Schools Federal Credit Union, account number XXXXXX0970 on behalf of the client. Of this sum, the client was entitled to the full amount - \$1,052,311.57. Respondent failed to maintain a balance of \$1,052,311.57 on behalf of the client in the account in willful violation of Rules of Professional Conduct, rule 4-100(A).

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COUNT FIVE

Case No. 16-O-13988  
Business and Professions Code, section 6106  
[Moral Turpitude - Misrepresentation]

6. On or about August 13, 2016, Respondent stated in writing to State Bar Investigator Alma Cueto, that Respondent had purchased cashier's checks and returned all funds in trust held on behalf of her client, Cynthia Bangi to Ms. Bangi. Respondent also provided a "Client Ledger Card" that purported to show disbursements of funds to Ms. Bangi. At the time these statements were written, Respondent knew or was grossly negligent in not knowing the statements were false. In so doing, Respondent thereby committed an act of moral turpitude, dishonesty, or corruption in willful violation of Business and Professions Code, section 6106.

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 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

By:   
Drew Massey  
Senior Trial Counsel

DATED: December 5, 2016

DECLARATION OF SERVICE

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

CASE NUMBER(s): 16-O-13988

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 0799 10 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. Includes contact info for Heather June Christiansen Stanley and James Irwin Ham.

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: December 5, 2016

SIGNED: Kim Wimbish
KIM WIMBISH
Declarant