State Bar Court of California **Hearing Department** ORIGINAL PUBLIC MATTER Los Angeles Los Angeles ACTUAL SUSPENSION Counsel For The State Bar Case Number(s): For Court use only 16-0-17720 Shataka Shores-Brooks **Senior Trial Counsel** 845 South Figueroa Street Los Angeles, CA 90017 (213) 765-1091 STATE BAR COURT CLERK'S OFFICE Bar # 240392 LOS ANGELES In Pro Per Respondent Nima Stephen Vokshori 1010 Wilshire Blvd. Suite 1404 Los Angeles, CA 90017 (213) 986-4323 Submitted to: Settlement Judge Bar # 245570 STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND ORDER APPROVING In the Matter of:

Note: All information required by this form and any additional information which cannot be provided in the space provided, must be set forth in an attachment to this stipulation under specific headings, e.g., "Facts," "Dismissals," "Conclusions of Law," "Supporting Authority," etc.

ACTUAL SUSPENSION

PREVIOUS STIPULATION REJECTED

A. Parties' Acknowledgments:

A Member of the State Bar of California

NIMA STEPHEN VOKSHORI

Bar # 245570

(Respondent)

- (1) Respondent is a member of the State Bar of California, admitted December 3, 2006.
- (2) The parties agree to be bound by the factual stipulations contained herein even if conclusions of law or disposition are rejected or changed by the Supreme Court.
- (3) All investigations or proceedings listed by case number in the caption of this stipulation are entirely resolved by this stipulation and are deemed consolidated. Dismissed charge(s)/count(s) are listed under "Dismissals." The stipulation consists of **11** pages, not including the order.
- (4) A statement of acts or omissions acknowledged by Respondent as cause or causes for discipline is included under "Facts."

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(5)	Conclusions of law, drawn from and specifically referring to the facts are also included under "Conclusions of Law".					
(6)	The parties must include supporting authority for the recommended level of discipline under the heading "Supporting Authority."					
(7)	Ne pe	No more than 30 days prior to the filing of this stipulation, Respondent has been advised in writing of any pending investigation/proceeding not resolved by this stipulation, except for criminal investigations.				
(8)	Payment of Disciplinary Costs—Respondent acknowledges the provisions of Bus. & Prof. Code §§6086.10 & 6140.7. (Check one option only):					
	 Until costs are paid in full, Respondent will remain actually suspended from the practice of law unless relief is obtained per rule 5.130, Rules of Procedure. Costs are to be paid in equal amounts prior to February 1 for the following membership years: two bil cycles following effective date of the Supreme Court Order. (Hardship, special circumstances or other good cause per rule 5.132, Rules of Procedure.) If Respondent fails to pay any installment as described above, or as may be modified by the State Bar Court, the remaining balance is due and payable immediately. Costs are waived in part as set forth in a separate attachment entitled "Partial Waiver of Costs". 					
ľ	B. Aggravating Circumstances [Standards for Attorney Sanctions for Professional Misconduct, standards 1.2(h) & 1.5]. Facts supporting aggravating circumstances are required.					
(1)	□ (a)	Prior record of discipline State Bar Court case # of prior case				
	(b)	☐ Date prior discipline effective				
	(c)	Rules of Professional Conduct/ State Bar Act violations:				
	(d)	☐ Degree of prior discipline				
	(e)	☐ If Respondent has two or more incidents of prior discipline, use space provided below.				
2)		Intentional/Bad Faith/Dishonesty: Respondent's misconduct was dishonest, intentional, or surrounded by, or followed by bad faith.				
3)		Misrepresentation: Respondent's misconduct was surrounded by, or followed by, misrepresentation.				
4)		Concealment: Respondent's misconduct was surrounded by, or followed by, concealment.				
5)	Overreaching: Respondent's misconduct was surrounded by, or followed by, overreaching. See page 8.					
6)	Uncharged Violations: Respondent's conduct involves uncharged violations of the Business and Professions Code, or the Rules of Professional Conduct.					

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(7)		Trust Violation: Trust funds or property were involved and Respondent refused or was unable to account to the client or person who was the object of the misconduct for improper conduct toward said funds or property.			
(8)		Harm: Respondent's misconduct harmed significantly a client, the public, or the administration of justice.			
(9)		Indifference: Respondent demonstrated indifference toward rectification of or atonement for the consequences of his or her misconduct.			
(10)		Candor/Lack of Cooperation: Respondent displayed a lack of candor and cooperation to victims of his/her misconduct, or to the State Bar during disciplinary investigations or proceedings.			
(11)		Multiple Acts: Respondent's current misconduct evidences multiple acts of wrongdoing.			
(12)		Pattern: Respondent's current misconduct demonstrates a pattern of misconduct.			
(13)		Restitution: Respondent failed to make restitution.			
(14)	\boxtimes	Vulnerable Victim: The victim(s) of Respondent's misconduct was/were highly vulnerable. See page 8.			
(15)		No aggravating circumstances are involved.			
C. Mitigating Circumstances [see standards 1.2(i) & 1.6]. Facts supporting mitigating circumstances are required.					
(1)		No Prior Discipline: Respondent has no prior record of discipline over many years of practice coupled with present misconduct which is not likely to recur.			
(2)		No Harm: Respondent did not harm the client, the public, or the administration of justice.			
(3)		Candor/Cooperation: Respondent displayed spontaneous candor and cooperation with the victims of his/her misconduct or `to the State Bar during disciplinary investigations and proceedings.			
4)		Remorse: Respondent promptly took objective steps demonstrating spontaneous remorse and recognition of the wrongdoing, which steps were designed to timely atone for any consequences of his/her misconduct.			
5)		Restitution: Respondent paid \$ on in restitution to without the threat or force of disciplinary, civil or criminal proceedings.			
6)		Delay: These disciplinary proceedings were excessively delayed. The delay is not attributable to Respondent and the delay prejudiced him/her.			
7)		Good Faith: Respondent acted with a good faith belief that was honestly held and objectively reasonable.			
8)		Emotional/Physical Difficulties: At the time of the stipulated act or acts of professional misconduct Respondent suffered extreme emotional difficulties or physical or mental disabilities which expert testimony would establish was directly responsible for the misconduct. The difficulties or disabilities were not the			

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			duct of any illegal conduct by the member, such as illegal drug or substance abuse, and the difficulties lisabilities no longer pose a risk that Respondent will commit misconduct.				
(9)		whi	Severe Financial Stress: At the time of the misconduct, Respondent suffered from severe financial stress which resulted from circumstances not reasonably foreseeable or which were beyond his/her control and which were directly responsible for the misconduct.				
(10)			Family Problems: At the time of the misconduct, Respondent suffered extreme difficulties in his/her personal life which were other than emotional or physical in nature.				
(11)			Good Character: Respondent's extraordinarily good character is attested to by a wide range of references in the legal and general communities who are aware of the full extent of his/her misconduct.				
(12)		Rehabilitation: Considerable time has passed since the acts of professional misconduct occurred followed by convincing proof of subsequent rehabilitation.					
(13)		No	mitigating circumstances are involved.				
Addi	tiona	al mit	tigating circumstances:				
	N	o Re	cord of Prior Discipline, see page 8.				
	P	retria	l Stipulation, see pages 8-9.				
D. D	D. Discipline:						
(1)	\boxtimes	Stayed Suspension:					
	(a)	Respondent must be suspended from the practice of law for a period of two years .					
		i.	and until Respondent shows proof satisfactory to the State Bar Court of rehabilitation and fitness to practice and present learning and ability in the general law pursuant to standard 1.2(c)(1) Standards for Attorney Sanctions for Professional Misconduct.				
		ii.	and until Respondent pays restitution as set forth in the Financial Conditions form attached to this stipulation.				
		iii.	and until Respondent does the following:				
	(b)	\boxtimes	The above-referenced suspension is stayed.				
2)	\boxtimes	Probation:					
		spondent must be placed on probation for a period of two years , which will commence upon the effective of the Supreme Court order in this matter. (See rule 9.18, California Rules of Court)					
3)	\boxtimes	Actu	al Suspension:				
	(a) Respondent must be actually suspended from the practice of law in the State of California for a per of thirty days .		Respondent must be actually suspended from the practice of law in the State of California for a period of thirty days .				
		i.	and until Respondent shows proof satisfactory to the State Bar Court of rehabilitation and fitness to practice and present learning and ability in the general law pursuant to standard 1.2(c)(1), Standards for Attorney Sanctions for Professional Misconduct				

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		ii. and until Respondent pays restitution as set forth in the Financial Conditions form attached to this stipulation.				
		iii. and until Respondent does the following: .				
E.	Add	itional Conditions of Probation:				
(1)		If Respondent is actually suspended for two years or more, he/she must remain actually suspended until he/she proves to the State Bar Court his/her rehabilitation, fitness to practice, and present learning and ability in the general law, pursuant to standard 1.2(c)(1), Standards for Attorney Sanctions for Professional Misconduct.				
(2)	\boxtimes	During the probation period, Respondent must comply with the provisions of the State Bar Act and Rules of Professional Conduct.				
(3)	\boxtimes	Within ten (10) days of any change, Respondent must report to the Membership Records Office of the State Bar and to the Office of Probation of the State Bar of California ("Office of Probation"), all changes information, including current office address and telephone number, or other address for State Bar purposes, as prescribed by section 6002.1 of the Business and Professions Code.				
(4)		Within thirty (30) days from the effective date of discipline, Respondent must contact the Office of Probat and schedule a meeting with Respondent's assigned probation deputy to discuss these terms and conditions of probation. Upon the direction of the Office of Probation, Respondent must meet with the probation deputy either in-person or by telephone. During the period of probation, Respondent must promptly meet with the probation deputy as directed and upon request.				
(5)		Respondent must submit written quarterly reports to the Office of Probation on each January 10, April 10, July 10, and October 10 of the period of probation. Under penalty of perjury, Respondent must state whether Respondent has complied with the State Bar Act, the Rules of Professional Conduct, and all conditions of probation during the preceding calendar quarter. Respondent must also state whether there are any proceedings pending against him or her in the State Bar Court and if so, the case number and current status of that proceeding. If the first report would cover less than 30 days, that report must be submitted on the next quarter date, and cover the extended period.				
		In addition to all quarterly reports, a final report, containing the same information, is due no earlier than twenty (20) days before the last day of the period of probation and no later than the last day of probation.				
(6)		Respondent must be assigned a probation monitor. Respondent must promptly review the terms and conditions of probation with the probation monitor to establish a manner and schedule of compliance. During the period of probation, Respondent must furnish to the monitor such reports as may be requested, in addition to the quarterly reports required to be submitted to the Office of Probation. Respondent must cooperate fully with the probation monitor.				
(7)		Subject to assertion of applicable privileges, Respondent must answer fully, promptly and truthfully any inquiries of the Office of Probation and any probation monitor assigned under these conditions which are directed to Respondent personally or in writing relating to whether Respondent is complying or has complied with the probation conditions.				
(8)	Within one (1) year of the effective date of the discipline herein, Respondent must provide to Probation satisfactory proof of attendance at a session of the Ethics School, and passage of at the end of that session.					
		No Ethics School recommended. Reason:				

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(9)		Respondent must comply with all conditions of probation imposed in the underlying criminal matter and must so declare under penalty of perjury in conjunction with any quarterly report to be filed with the Office of Probation.					
(10)		The following conditions are attached hereto and incorporated:					
			Substance Abuse Conditions		Law Office Management Conditions		
			Medical Conditions		Financial Conditions		
F. 0	ther	Con	ditions Negotiated by the Parties	s:			
(1)	\boxtimes	Multistate Professional Responsibility Examination: Respondent must provide proof of passage of the Multistate Professional Responsibility Examination ("MPRE"), administered by the National Conference of Bar Examiners, to the Office of Probation during the period of actual suspension or withir one year, whichever period is longer. Failure to pass the MPRE results in actual suspension without further hearing until passage. But see rule 9.10(b), California Rules of Court, and rule 5.162(A) & (E), Rules of Procedure.					
			lo MPRE recommended. Reason: .				
(2)		Rule 9.20, California Rules of Court: Respondent must comply with the requirements of rule 9.20, California Rules of Court, and perform the acts specified in subdivisions (a) and (c) of that rule within 30 and 40 calendar days, respectively, after the effective date of the Supreme Court's Order in this matter.					
(3)		Conditional Rule 9.20, California Rules of Court: If Respondent remains actually suspended for 90 days or more, he/she must comply with the requirements of rule 9.20, California Rules of Court, and perform the acts specified in subdivisions (a) and (c) of that rule within 120 and 130 calendar days, respectively, after the effective date of the Supreme Court's Order in this matter.					
(4)		Credit for Interim Suspension [conviction referral cases only]: Respondent will be credited for the period of his/her interim suspension toward the stipulated period of actual suspension. Date of commencement of interim suspension:					
(5)		Othe	er Conditions:				

ATTACHMENT TO

STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION

IN THE MATTER OF:

NIMA STEPHEN VOKSHORI

CASE NUMBER:

16-O-17720

FACTS AND CONCLUSIONS OF LAW.

Respondent admits that the following facts are true and that he is culpable of violations of the specified statutes and/or Rules of Professional Conduct.

Case No. 16-O-17720 (Complainant: Fausto Ruiz)

FACTS:

- 1. On May 4, 2016, Fausto Ruiz contacted respondent concerning legal services to obtain a loan modification. On that day, Mr. Ruiz entered into two fee agreements with respondent: a "legal services agreement" and a "retainer agreement."
- 2. The legal services agreement ("LSA") provided for loan modification for a flat fee of \$2,400 and a monthly maintenance fee of \$249 if the representation exceeded four months. The LSA stated that the legal fees were not immediately due, but rather due after completion of loan modification services.
- 3. The retainer agreement provided for litigation services related to mortgage loan forbearance. The retainer called for Mr. Ruiz to make an immediate initial payment of \$750 and monthly payments of \$750, with the first monthly payment also due immediately and then continuing on a set date each month.
- 4. Respondent's office submitted a request for loan modification to Mr. Ruiz's bank on August 8, 2016.
- 5. On August 24, 2016, the bank denied Mr. Ruiz's loan modification request.
- Between May 6, 2016 and August 17, 2016, and prior to completion of all services related to the loan modification respondent had been contracted to perform, respondent collected \$3,000 from Mr. Ruiz.
- 7. On September 22, 2016, Mr. Ruiz requested that respondent's office close his case and settle the account balance. Respondent's office calculated that respondent owed Mr. Ruiz \$351 in unearned fees.
- 8. In order for Mr. Ruiz to receive the \$351 in unearned fees, respondent's office sent Mr. Ruiz a "release and refund" agreement which sought an agreement from Mr. Ruiz not to bring any complaint against respondent, including administrative complaints based on fees charged for the loan modification services.

- 9. Mr. Ruiz did not respond to respondent's request for the "release and refund" agreement. Respondent's office did not return the \$351 owed to Mr. Ruiz.
- 10. After initiation of State Bar proceedings against respondent, respondent refunded \$3,000 to Mr. Ruiz.

CONCLUSIONS OF LAW:

- 11. By collecting \$3,000 in advanced fees from Mr. Ruiz for legal services related to loan modification in violation of California Civil Code section 2944.7, respondent willfully violated Business and Professions Code, section 6068(a).
- 12. By collecting \$3,000 in advanced fees from Mr. Ruiz for legal services related to loan modification in violation of California Civil Code section 2944.7, respondent willfully violated California Rules of Professional Conduct, rule 4-200(A).
- 13. By seeking an agreement from Mr. Ruiz that professional misconduct shall not be reported to the State Bar, respondent willfully violated Business and Professions Code, section 6090.5(a)(1).

AGGRAVATING CIRCUMSTANCES.

Overreaching (Std. 1.5(g)): Respondent exploited his superior knowledge and position of trust when he presented Mr. Ruiz with multiple contracts for services related to loan modification and thereby extracted illegal fees from Mr. Ruiz, who sought assistance to save his home from foreclosure. Respondent then sought from Mr. Ruiz a release prohibiting him from filing a complaint against respondent. After Mr. Ruiz did not sign the release, respondent did not return \$351 that respondent had identified as unearned fees. (See In the Matter of Brockway, (Review Dept. 2006) 4 Cal. State Bar Ct. Rptr. 944 [overreaching where attorney used technical legalese in his "true retainer" agreements with vulnerable clients in an effort to exempt himself from providing any meaningful service, and required clients to sign settlement agreements either withdrawing state bar complaints against the attorney or releasing the attorney from all legal liability].)

Highly Vulnerable Victim (Std. 1.5(n)): Prior to retaining services, Mr. Ruiz communicated to respondent's office that he and his wife were retired with low-income and that it was a struggle for the couple to pay for legal services in order to save their home. Nevertheless, respondent collected an illegal fee from Mr. Ruiz in exchange for loan modification services.

MITIGATING CIRCUMSTANCES.

No Prior Discipline: Respondent was admitted to practice in California on December 3, 2006, and had over nine years of practice with no record of prior discipline at the time the misconduct occurred in 2016. (See, In the Matter of Riley (1994) 3 Cal. State Bar Ct. Rptr. 91, 116.)

Prefiling Stipulation: By entering into this stipulation, respondent has acknowledged his misconduct and is entitled to mitigation for recognition of wrongdoing and saving the State Bar significant resources and time. (*Silva-Vidor v. State Bar* (1989) 49 Cal.3d 1071, 1079 [where mitigative credit was given for entering into a stipulation as to facts and culpability]; *In the Matter of Spaith*

(Review Dept. 1996) 3 Cal. State Bar Ct. Rptr. 511, 521 [where the attorney's stipulation to facts and culpability was held to be a mitigating circumstance].)

AUTHORITIES SUPPORTING DISCIPLINE.

The Standards for Attorney Sanctions for Professional Misconduct "set forth a means for determining the appropriate disciplinary sanction in a particular case and to ensure consistency across cases dealing with similar misconduct and surrounding circumstances." (Rules Proc. of State Bar, tit. IV, Stds. for Atty. Sanctions for Prof. Misconduct, std. 1.1. All further references to standards are to this source.) The standards help fulfill the primary purposes of discipline, which include: protection of the public, the courts and the legal profession; maintenance of the highest professional standards; and preservation of public confidence in the legal profession. (See std. 1.1; *In re Morse* (1995) 11 Cal.4th 184, 205.)

Although not binding, the standards are entitled to "great weight" and should be followed "whenever possible" in determining level of discipline. (In re Silverton (2005) 36 Cal.4th 81, 92, quoting In re Brown (1995) 12 Cal.4th 205, 220 and In re Young (1989) 49 Cal.3d 257, 267, fn. 11.) Adherence to the standards in the great majority of cases serves the valuable purpose of eliminating disparity and assuring consistency, that is, the imposition of similar attorney discipline for instances of similar attorney misconduct. (In re Naney (1990) 51 Cal.3d 186, 190.) If a recommendation is at the high end or low end of a standard, an explanation must be given as to how the recommendation was reached. (Std. 1.1.) "Any disciplinary recommendation that deviates from the Standards must include clear reasons for the departure." (Std. 1.1; Blair v. State Bar (1989) 49 Cal.3d 762, 776, fn. 5.)

In determining whether to impose a sanction greater or less than that specified in a given standard, in addition to the factors set forth in the specific standard, consideration is to be given to the primary purposes of discipline; the balancing of all aggravating and mitigating circumstances; the type of misconduct at issue; whether the client, public, legal system or profession was harmed; and the member's willingness and ability to conform to ethical responsibilities in the future. (Stds. 1.7(b) and (c).)

In this matter, respondent admits to committing three acts of professional misconduct. Standard 1.7(a) requires that where a respondent "commits two or more acts of misconduct and the Standards specify different sanctions for each act, the most severe sanction must be imposed."

The most severe sanction applicable to respondent's misconduct is found in standard 2.12(a), which applies to respondent's violation of B&P section 6068(a). Standard 2.12(a) presumes disbarment or actual suspension.

To determine the appropriate level of discipline, consideration must also be given to the aggravating and mitigating circumstances. In aggravation, the victim of respondent's misconduct was highly vulerable and respondent's misconduct was sourrounded by overreaching. Respondent is entitled to mitigation for nine years of discipline-free practice. Upon weighing the aggravating and mitigation circumstances, an actual suspension of 30 days is appropriate under the standards.

The recommended discipline is within the range of the applicable standard and in accordance with case law. An actual suspension of six months subject to a three year probation was imposed against the attorney in *In the Matter of Taylor* (Review Dept.2012) 5 Cal. State Bar Ct. Rptr. 221. In that case, Taylor was culpable of charging pre-performance loan modification fees in violation of California Civil Code section 2944.7 in eight client matters. Taylor collected advance fees for a financial analysis to

determine if the client should seek a loan modification. Throughout the disciplinary proceedings, Taylor maintained that section 2944.7 permitted him to charge for such "unbundled" services – meaning services clearly related to obtaining a loan modification – but the court rejected the argument. (See also Matter of DeClue, (Review Dept. 2016) 5 Cal. State Bar Ct. Rptr. 437 [holding that when a client enters into a fee agreement for the sole purpose of securing loan modification, litigation services performed by the attorney are ancillary to ultimate purpose of loan modification and also subject to the prohibition against advance fees].) Taylor's misconduct was aggravated by multiple acts, significant client harm, and lack of remorse; his single mitigating factor was good character.

Here, the gravamen of respondent's misconduct is violation of loan modification laws due to "unbundling" practices similar to those involved in *In the Matter of Taylor, supra*, 5 Cal. State Bar Ct. Rptr. 221. Respondent's violation in one client matter is less in scope than Taylor's violations in eight client matters and therefore warrants less discipline. Furthermore, respondent's nine year period of discipline-free practice is a mitigating factor. On the other hand, respondent also sought an agreement with a client not to file a complaint against him and has the additional aggravation of overreaching in the case of a vulnerable client. Accordingly, a two-year stayed suspension with a two-year probation, including a 30-day actual suspension is the appropriate level of discipline.

COSTS OF DISCIPLINARY PROCEEDINGS.

Respondent acknowledges that the Office of Chief Trial Counsel has informed respondent that as of December 20, 2017, the discipline costs in this matter are \$3,215. Respondent further acknowledges that should this stipulation be rejected or should relief from the stipulation be granted, the costs in this matter may increase due to the cost of further proceedings.

EXCLUSION FROM MINIMUM CONTINUING LEGAL EDUCATION ("MCLE") CREDIT

Respondent may <u>not</u> receive MCLE credit for completion of State Bar Ethics School. (Rules Proc. of State Bar, rule 3201.)

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In the Matter of: NIMA STEPHEN VOKSHORI	Case numbe 16-O-17720	r(s);			
SIGNATURE OF THE PARTIES					
By their signatures below, the partie recitations and each of the terms an	s and their counsel, as appl d conditions of this Stipulati	licable, signify their agreement with each of the on Re Facts, Conclusions of Law, and Disposition.			
December 27, 2017 Date Respond	dent's Signature	Nima Stephen Vokshori			

Print Name

Print Name

Shataka Shores-Brooks

Respondent's Counsel Signature

Date

(Do not write al	bove this line.)				
In the Matte		Case Number(s): 16-O-17720			
	ACTUAL	SUSPENSION ORDER			
	stipulation to be fair to the parties and smissal of counts/charges, if any, is G	that it adequately protects the public, IT IS ORDERED that the RANTED without prejudice, and:			
×	The stipulated facts and disposition Supreme Court.	are APPROVED and the DISCIPLINE RECOMMENDED to the			
	The stipulated facts and disposition are APPROVED AS MODIFIED as set forth below, and the DISCIPLINE IS RECOMMENDED to the Supreme Court.				
	All Hearing dates are vacated.				
within 15 day stipulation. (S	s after service of this order, is granted See rule 5.58(E) & (F), Rules of Proce	ed unless: 1) a motion to withdraw or modify the stipulation, filed it; or 2) this court modifies or further modifies the approved dure.) The effective date of this disposition is the effective date days after file date. (See rule 9.18(a), California Rules of			
<u>Janu</u> Date	an 26,2018	CYNTHIA VALENZUELA			
		Judge of the State Bar Court			

CERTIFICATE OF SERVICE

[Rules Proc. of State Bar; Rule 5.27(B); Code Civ. Proc., § 1013a(4)]

I am a Case Administrator of the State Bar Court of California. I am over the age of eighteen and not a party to the within proceeding. Pursuant to standard court practice, in the City and County of Los Angeles, on January 26, 2018, I deposited a true copy of the following document(s):

STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND ORDER APPROVING

in a sealed envelope for collection and mailing on that date as follows:

by first-class mail, with postage thereon fully prepaid, through the United States Postal Service at Los Angeles, California, addressed as follows:

NIMA S. VOKSHORI VOKSHORI LAW GROUP 1010 WILSHIRE BLVD APT 1404 LOS ANGELES, CA 90017

by interoffice mail through a facility regularly maintained by the State Bar of California addressed as follows:

DESIREE M. FAIRLY, Enforcement, Los Angeles

I hereby certify that the foregoing is true and correct. Executed in Los Angeles, California, on January 26, 2018.

Paul Barona

Case Administrator

State Bar Court