

State Bar Court of California		
Hearing Department Los Angeles FURLIC MATTER		
	REPROVAL	
Counsel For The State Bar	Case Number(s): 17-C-03585-CV	For Court use only
Angie Esquivel Deputy Trial Counsel 845 S. Figueroa Street Los Angeles, CA 90017-2515		
(213) 765-1080		FILED
Bar # 286432	kwiktag® 226 154 904	JAN 18 2018 EE
In Pro Per Respondent		STATE BAR COURT CLERK'S OFFICE
Vyacheslav Kuznyetsov 16000 Sherman Way, Apt. #320 Van Nuys, CA 91406 (818) 808-9902		LOS ANGELES
	Submitted to: Settlement Ju	dge
Bar # 290407	STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND ORDER APPROVING	
In the Matter of: VYACHESLAV KUZNYETSOV	DISPOSITION AND ORDER	APPROVING
	PUBLIC REPROVAL	
Bar # 290407	☐ PREVIOUS STIPULATION REJECTED	
A Member of the State Bar of California (Respondent)		

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.

A. Parties' Acknowledgments:

- (1) Respondent is a member of the State Bar of California, admitted June 5, 2013.
- (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."



TDC	HOL WI	ne auc	ve this line.)	
(5)	Co La	Conclusions of law, drawn from and specifically referring to the facts are also included under "Conclusions of Law".		
(6)	Th "S	The parties must include supporting authority for the recommended level of discipline under the heading "Supporting Authority."		
(7)	No 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)	Pa 61	ymer 40.7.	nt of Disciplinary Costs—Respondent acknowledges the provisions of Bus. & Prof. Code §§6086.10 & (Check one option only):	
		re C C (F C C	osts are added to membership fee for calendar year following effective date of discipline (public proval). ase ineligible for costs (private reproval). osts are to be paid in equal amounts prior to February 1 for the following membership years: lardship, special circumstances or other good cause per rule 5.132, Rules of Procedure.) If espondent fails to pay any installment as described above, or as may be modified by the State Bar ourt, the remaining balance is due and payable immediately. osts are waived in part as set forth in a separate attachment entitled "Partial Waiver of Costs".	
(9) The parties understand that:			ies understand that:	
	(a)		A private reproval imposed on a respondent as a result of a stipulation approved by the Court prior to initiation of a State Bar Court proceeding is part of the respondent's official State Bar membership records, but is not disclosed in response to public inquiries and is not reported on the State Bar's web page. The record of the proceeding in which such a private reproval was imposed is not available to the public except as part of the record of any subsequent proceeding in which it is introduced as evidence of a prior record of discipline under the Rules of Procedure of the State Bar.	
	(b)		A private reproval imposed on a respondent after initiation of a State Bar Court proceeding is part of the respondent's official State Bar membership records, is disclosed in response to public inquiries and is reported as a record of public discipline on the State Bar's web page.	
	(c)	\boxtimes	A public reproval imposed on a respondent is publicly available as part of the respondent's official State Bar membership records, is disclosed in response to public inquiries and is reported as a record of public discipline on the State Bar's web page.	
Mis	Aggr scon uire	duct	ting Circumstances [Standards for Attorney Sanctions for Professional , standards 1.2(h) & 1.5]. Facts supporting aggravating circumstances are	
(1)		Prio	r record of discipline	
	(a)		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 or a separate attachment entitled "Prior Discipline.	

(Do 1	not wri	te above this line.)	
(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.	
(6)		Uncharged Violations: Respondent's conduct involves uncharged violations of the Business and Professions Code or the Rules of Professional Conduct.	
(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)		Vulnerable Victim: The victim(s) of Respondent's misconduct was/were highly vulnerable.	
(15)	\boxtimes	No aggravating circumstances are involved.	
Addi	tiona	al aggravating circumstances:	
C. N circ	litig ums	ating Circumstances [see standards 1.2(i) & 1.6]. Facts supporting mitigating stances 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 investigation 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	

(Do n	ot wri	te above this line.)		
(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 product of any illegal conduct by the member, such as illegal drug or substance abuse, and the difficulties or disabilities no longer pose a risk that Respondent will commit misconduct.		
(9)		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 subsequent rehabilitation.		
(13)		No mitigating circumstances are involved.		
Addi	tiona	al mitigating circumstances:		
		Good Character, see page 8. Pretrial Stipulation, see page 8.		
D. D	isci	pline:		
(1)		Private reproval (check applicable conditions, if any, below)		
	(a)	Approved by the Court prior to initiation of the State Bar Court proceedings (no public disclosure).		
<u>or</u>	(b)	Approved by the Court after initiation of the State Bar Court proceedings (public disclosure).		
(2)	\boxtimes	Public reproval (Check applicable conditions, if any, below)		
E. C	ond	itions Attached to Reproval:		
(1)	\boxtimes	Respondent must comply with the conditions attached to the reproval for a period of one (1) year.		
(2)	\boxtimes	During the condition period attached to the reproval, Respondent must comply with the provisions of the State Bar Act and Rules of Professional Conduct.		

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(3)		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)	\boxtimes	Within thirty (30) days from the effective date of discipline, Respondent must contact the Office of Proba and schedule a meeting with Respondent's assigned probation deputy to discuss these terms and conditions of reproval. Upon the direction of the Office of Probation, Respondent must meet with the probation deputy either in-person or by telephone. During the reproval conditions period, Respondent m 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 condition period attached to the reproval. 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 the reproval during the preceding calendar quarter. Responder must also state in each report 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 (thirty) days, that report must be submitted on the next following quarter date, and cover the extended period.		
		In activen	Idition to all quarterly reports, a final report, containing the same information, is due no earlier than ty (20) days before the last day of the condition period and no later than the last day of the condition od.	
(6)		Respondent must be assigned a probation monitor. Respondent must promptly review the terms and conditions of reproval with the probation monitor to establish a manner and schedule of compliance. During the reproval conditions period, Respondent must furnish 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 monitor.		
(7)	\boxtimes	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 conditions attached to the reproval.		
(8)	\boxtimes	Within one (1) year of the effective date of the discipline herein, Respondent must provide to the Office of Probation satisfactory proof of attendance at a session of the Ethics School, and passage of the test given at the end of that session.		
			No Ethics School recommended. Reason:	
(9)	\boxtimes	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)	\boxtimes	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 within one year of the effective date of the reproval.		
			No MPRE recommended. Reason:	
(11)		The f	ollowing conditions are attached hereto and incorporated:	
			Substance Abuse Conditions Law Office Management Conditions	
			Medical Conditions Financial Conditions	

F. Other Conditions Negotiated by the Parties:

None.

ATTACHMENT TO

STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION

IN THE MATTER OF:

VYACHESLAV KUZNYETSOV

CASE NUMBER:

17-C-03585-CV

FACTS AND CONCLUSIONS OF LAW.

Respondent admits that the following facts are true and that the facts and circumstances surrounding the offense for which he was convicted involved other misconduct warranting discipline.

Case No. 17-C-03585-CV (Conviction Proceedings)

PROCEDURAL BACKGROUND IN CONVICTION PROCEEDING:

- 1. This is a proceeding pursuant to sections 6101 and 6102 of the Business and Professions Code and rule 9.10 of the California Rules of Court.
- 2. On August 22, 2016, the Santa Barbara County District Attorney's Office filed a complaint in Santa Barbara Superior Court case no. 1497261, charging respondent with one count of violating California Vehicle Code section 23152(a) [Driving Under the Influence], a misdemeanor, one count of violating California Vehicle Code section 23152(b) [Driving with 0.08 percent or more blood alcohol], a misdemeanor, and one count of violating California Vehicle Code section 20002(a)[Hit and Run with Property Damage], a misdemeanor.
- 3. On May 24, 2017, respondent pled nolo contendere to one count of violating California Vehicle Code section 23152(a) [Driving Under the Influence], and the remaining counts were dismissed pursuant to Penal Code section 1385.
- 4. On May 24, 2017, the court accepted the respondent's plea and found him guilty. On that date, the court suspended the imposition of sentence and placed respondent on informal probation for a period of three years with conditions, which included incarceration in the Santa Barbara County Jail for 15 days, alcohol-related search terms, court ordered restitution and fine payment, and the requirements that he attend and complete the first time offender alcohol program. To date, respondent has successfully complied with the terms and conditions of his summary probation.
- 5. On May 24, 2017, the victim's Acknowledgment of Civil Compromise, acknowledging that respondent had paid the victim full satisfaction and compensation, was filed with the court.
- 6. On August 31, 2017, the Review Department of the State Bar Court issued an order referring the matter to the Hearing Department for a hearing and decision recommending the discipline to be imposed in the event that the Hearing Department finds that the facts and circumstances surrounding the offense for which respondent was convicted involved moral turpitude or other misconduct warranting discipline.

FACTS:

- 7. In the early morning hours of July 29, 2016, respondent drove his vehicle while intoxicated and was involved in a traffic collision with an unoccupied vehicle in the area of Anacapa and Haley Streets in the city of Santa Barbara. Respondent immediately left the scene of the collision without stopping. However, respondent stopped his vehicle at a nearby location, shortly after the collision.
- 8. Two Santa Barbara police officers subsequently responded to the scene to conduct an investigation. Respondent's balance was unsteady and his breath smelled of alcohol when police officers made contact with him. Respondent was cooperative when questioned by the officers and admitted that he had two beers and a shot of Whiskey at a local bar prior to driving. Respondent also admitted that he was involved in a traffic collision in the area of Anacapa and Haley Streets.
- 9. Thereafter, respondent was detained on suspicion of driving under influence of alcohol and administered a series of subjective field sobriety tests, which respondent failed to complete successfully.
- 10. Respondent was thereafter arrested for driving under the influence of alcohol in violation of California Vehicle Code sections 23152(b) and hit and run in violation of California Vehicle Code Section 20002(a). Respondent submitted to a breath test. Respondent's blood alcohol content, as measured by the Intox EC/IR-II, was .21/.18/.22 percent.

AGGRAVATING CIRCUMSTANCES.

None.

MITIGATING CIRCUMSTANCES.

Good Character (Std. 1.6(f)): Respondent provided evidence of good character in the form of letters from eight individuals in the general and legal communities, which include four attorneys who have known respondent for more than six years, three colleagues who have known respondent for up to ten years and a family friend who has known respondent for more than twenty years. These individuals indicated that despite the misconduct committed by respondent of which they are fully aware, they believe it to be out of his character and do not hesitate to attest to respondent's character as being a considerate, trustworthy, helpful and hardworking individual that always puts others before himself.

Pretrial Stipulation: By entering into this stipulation, respondent has acknowledged 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 a conviction referral proceeding, "discipline is imposed according to the gravity of the crime and circumstances of the case." (In the Matter of Katz (Review Dept. 1991) 1 Cal. State Bar Ct. Rptr. 502, 510.) Respondent's culpability in this proceeding is conclusively established by the record of his convictions. (Bus. & Prof. Code, § 6101, subd. (a); In re Crooks (1990) 51 Cal.3d 1090, 1097.) Respondent is presumed to have committed all of the elements of the crimes of which he was convicted. (In re Duggan (1976) 17 Cal.3d 416, 423; In the Matter of Respondent O (Review Dept. 1993) 2 Cal. State Bar Ct. Rptr. 581, 588.)

A conviction for driving under the influence of alcohol is not a crime that involves moral turpitude per se. (In re Kelley (1990) 52 Cal.3d 487, 494.) The foremost purpose of the moral turpitude standard is not to punish attorneys but to protect the public, courts, and the profession against unsuitable practitioners. (In re Scott (1991) 52 Cal.3d. 968, 978.) The California Supreme Court has explained that "[c]riminal conduct not committed in the practice of law or against a client reveals moral turpitude if it shows a deficiency in any character trait necessary for the practice of law (such as trustworthiness, honesty, fairness, candor, and fidelity to fiduciary duties) or if it involves such a serious breach of a duty owed to another or to society, or such a flagrant disrespect for the law or for societal norms, that knowledge of the attorney's conduct would be likely to undermine public confidence in and respect for the legal profession." (In re Lesansky (2001) 25 Cal.4th 11, 16.)

Although respondent was convicted driving under the influence, which is not a crime involving moral turpitude, the facts and circumstances surrounding respondent's conviction constitute other conduct warranting discipline. (In the Matter of Oheb (Review Dept. 2006) 4 Cal. State Bar Ct. Rptr. 920 ["the circumstances surrounding respondent's convictions are reviewed to determine whether they in fact involved moral turpitude or other misconduct warranting discipline."].) Respondent committed hit and

run, while driving under the influence of alcohol with a BAC level of .20%, nearly three times above the legal limit.

As such, Standard 2.16(b) applies to respondent's conduct and provides that suspension or reproval is the presumed sanction for final conviction of a misdemeanor not involving moral turpitude but involving other misconduct warranting discipline. Given respondent's lack of aggravation and the fact that his misconduct is significantly mitigated by his good character and by entering into a pretrial stipulation, a public reproval will achieve the purposes of discipline expressed in Std. 1.1, including protection of the public, maintenance of high professional standards, and preservation of public confidence in the legal profession. (Std. 1.1.)

Case law supports this level of discipline. In *In re Kelley, supra*, 52 Cal.3d 487, an attorney was convicted twice of drunk driving within a 31-month period. On the first arrest, the attorney had driven her car into an embankment and was arrested at the scene. While on probation, imposed as a result of her first drunk driving conviction, she was stopped by a police officer while driving home and eventually arrested after failing a field sobriety test. No one was injured in either of her drunken driving offenses. The Court found that the attorney's conduct did not involve moral turpitude, but rather constituted other misconduct warranting disciplinary action. Noting there had been no specific harm caused to the public or the courts, as well as the attorney's significant mitigating evidence, the Court ordered her publicly reproved and directed her to participate in the State Bar's program on alcohol abuse.

Like the attorney in *In re Kelley*, respondent was convicted of driving under the influence of alcohol and has no prior record of discipline. However, unlike the attorney in *In re Kelley*, respondent has not been twice convicted for driving under the influence and has not violated the terms of his criminal probation ordered by the Superior Court. Although respondent's misconduct resulted in property damage to the victim's vehicle, respondent paid restitution to the victim for the property damage he caused. Furthermore, although respondent did not immediately stop his vehicle to inform the victim of the accident or provide his contact information, he stopped his vehicle at a nearby location shortly after the collision and was forthcoming with officers when asked about the incident. The facts and circumstances surrounding respondent's conviction did not involve moral turpitude. Therefore, a public reproval, on the terms and conditions set forth herein is appropriate and will fulfill the purposes of attorney discipline set forth in Standard 1.1.

COSTS OF DISCIPLINARY PROCEEDINGS

Respondent acknowledges that the Office of Chief Trial Counsel has informed respondent that as of January 5, 2018, the discipline costs in this matter are \$5,640. Respondent further acknowledges that should this stipulation be rejected or should relief from 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.)

(Do not write above this line.)		
In the Matter of:	Case number(s):	
VYACHESLAV KUZNYETSOV	17-C-03585-CV	

SIGNATURE OF THE PARTIES

By their signatures below, the parties and their counsel, as applicable, signify their agreement with each of the recitations and each of the terms and conditions of this Stipulation Re Facts, Conclusions of Law, and Disposition.

01.06.18 Date	Respondent's Signature	Vyacheslav Kuznyetsov Print Name
Date	Respondent's Counsel Signature	Print Name
1/9/18 Date	Deputy Trial Counsel's Signature	Angie Esquivel Print Name

(Do not write above this line.)			
In the Matter of: VYACHESLAV KUZNYETSOV		Case Number(s): 17-C-03585-CV	
	REPROVA	L ORDER	
Finding that the stipulation protects the public and that the interests of Respondent will be served by any conditions attached to the reproval, IT IS ORDERED that the requested dismissal of counts/charges, if any, is GRANTED without prejudice, and:			
	The stipulated facts and disposition are APPROVED AND THE REPROVAL IMPOSED.		
\boxtimes	The stipulated facts and disposition are APPROVED AS MODIFIED as set forth below, and the REPROVAL IMPOSED.		
	All court dates in the Hearing Department are	vacated.	
On page 1 of the Stipulation, in the lower right box, "Submitted to: Settlement Judge" is deleted and in its place is inserted "Submitted to: Assigned Judge"			
The parties are bound by the stipulation as approved unless: 1) a motion to withdraw or modify the stipulation, filed within 15 days after service of this order, is granted; or 2) this court modifies or further modifies the approved stipulation. (See rule 5.58(E) & (F), Rules of Procedure.) Otherwise the stipulation shall be effective 15 days after service of this order.			
Failure to comply with any conditions attached to this reproval may constitute cause for a separate proceeding for willful breach of rule 1-110, Rules of Professional Conduct.			
Date		1 Mie Valyzula IA VALENZUELA f 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 18, 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:

VYACHESLAV KUZNYETSOV 16000 SHERMAN WAY APT 320 VAN NUYS, CA 91406

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

ANGIE ESQUIVEL, Enforcement, Los Angeles

I hereby certify that the foregoing is true and correct. Executed in Los Angeles, California, on January 18, 2018.

Erick Estrada

Case Administrator

State Bar Court