

ORIGINAL

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| State Bar Court of California<br>Hearing Department<br>Los Angeles<br>DISBARMENT  |  |  |
|---|--|--|
| <b>Counsel For The State Bar</b><br><br><b>Caitlin M. Elen-Morin</b><br><b>Deputy Trial Counsel</b><br><b>845 S. Figueroa St.</b><br><b>Los Angeles CA, 90017</b><br><b>(213) 765-1653</b><br><br><b>Bar # 272163</b> | <b>Case Number(s):</b><br><b>17-N-00628</b><br><b>17-O-00990</b>   | <b>For Court use only</b><br><br><b>PUBLIC MATTER</b><br><br><b>FILED</b><br><br><b>JUN 16 2017</b><br><br><b>STATE BAR COURT</b><br><b>CLERK'S OFFICE</b><br><b>LOS ANGELES</b> |
| <b>In Pro Per Respondent</b><br><br><b>Alan Douglas Negron</b><br><b>1894 Stow St.</b><br><b>Simi Valley, CA 93063</b><br><b>(805) 419-3043</b><br><br><b>Bar # 174256</b>  | <b>kwiktag®</b> 226 150 221<br>  |  |
| <b>In the Matter of:</b><br><b>ALAN DOUGLAS NEGRON</b><br><br><b>Bar # 174256</b><br><br><b>A Member of the State Bar of California</b><br><b>(Respondent)</b>  | <b>Submitted to: Settlement Judge</b><br><br><b>STIPULATION RE FACTS, CONCLUSIONS OF LAW AND</b><br><b>DISPOSITION AND ORDER APPROVING; ORDER OF</b><br><b>INVOLUNTARY INACTIVE ENROLLMENT</b><br><br><b>DISBARMENT</b><br><br><input type="checkbox"/> <b>PREVIOUS STIPULATION REJECTED</b> |  |

**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 **December 13, 1994**.
- (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 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."
- (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) 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):
- ☒ Costs to be awarded to the State Bar.
  - ☐ Costs are waived in part as set forth in a separate attachment entitled "Partial Waiver of Costs".
  - ☐ Costs are entirely waived.
- (9) ORDER OF INACTIVE ENROLLMENT:  
The parties are aware that if this stipulation is approved, the judge will issue an order of inactive enrollment under Business and Professions Code section 6007, subdivision (c)(4), and Rules of Procedure of the State Bar, rule 5.111(D)(1).

**B. Aggravating Circumstances [Standards for Attorney Sanctions for Professional Misconduct, standards 1.2(h) & 1.5]. Facts supporting aggravating circumstances are required.**

- (1) ☒ **Prior record of discipline**
- (a) ☒ State Bar Court case # of prior case **14-O-03258 (S224939) ("first discipline")**.
  - (b) ☒ Date prior discipline effective **June 6, 2015**.
  - (c) ☒ Rules of Professional Conduct/ State Bar Act violations: **Rules of Professional Conduct/State Bar Act violations: Business and Professions Code section 6068(a) [failure to support laws of this state]; and Rules of Professional Conduct, rule 4-200(A) [collecting an unconscionable fee]**.
  - (d) ☒ Degree of prior discipline **A two-year stayed suspension and two years' probation with conditions including that respondent be actually suspended for the first six months of his probation and until he paid restitution of \$48,789.54, plus interest.**
  - (e) ☒ If respondent has two or more incidents of prior discipline, use space provided below:  
  
**See Stipulation, pages 7-8.**
- (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.

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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. **See page 8.**
- (10) ☐ **Lack of Candor/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. See page 8.
- (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) ☐ **No aggravating circumstances** are involved.

**Additional aggravating circumstances:**

**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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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.

**Additional mitigating circumstances: Pre-trial stipulation, see page 8.**

**D. Discipline:        Disbarment.**

**E. Additional Requirements:**

- (1) **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.
- (2) ☐ **Restitution:** Respondent must make restitution to \_\_\_\_\_ in the amount of \$ \_\_\_\_\_ plus 10 percent interest per year from \_\_\_\_\_. If the Client Security Fund has reimbursed \_\_\_\_\_ for all or any portion of the principal amount, respondent must pay restitution to CSF of the amount paid plus applicable interest and costs in accordance with Business and Professions Code section 6140.5. Respondent must pay the above restitution and furnish satisfactory proof of payment to the State Bar's Office of Probation in Los Angeles no later than \_\_\_\_\_ days from the effective date of the Supreme Court order in this case.
- (3) ☐ **Other:**

**ATTACHMENT TO**  
**STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION**

IN THE MATTER OF:                      ALAN DOUGLAS NEGRON

CASE NUMBERS:                      17-N-00628 and 17-O-00990

**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. 17-N-00628

**FACTS:**

1. On May 25, 2016, respondent entered into a Stipulation Re Facts, Conclusions of Law and Disposition ("Stipulation") with the State Bar of California in case numbers 15-O-13478-YDR and 15-N-15118. The Stipulation was approved by the State Bar Court Hearing Department on May 25, 2016.

2. On September 15, 2016, the California Supreme Court filed Order Number S235534 (State Bar case nos. 15-O-13478-YDR and 15-N-15118) ("Disciplinary Order"), which ordered that respondent be suspended from the practice of law for three years, stayed, and placed on three years' probation, subject to the conditions of probation recommended by the Hearing Department in its May 25, 2016 Order approving the Stipulation, including that respondent be suspended for the first two years of probation and until he proves compliance with Standard 1.2(c)(1), and that he comply with California Rules of Court, rule 9.20. Respondent's discipline became effective on October 15, 2016.

3. On October 3, 2016, respondent's probation deputy uploaded to respondent's State Bar profile a letter reminding respondent of the terms and conditions of the Disciplinary Order. The probation deputy also emailed respondent at his membership email address to inform him that the letter had been uploaded to his State Bar profile. Respondent received the email and the October 3, 2016 letter from the probation deputy.

4. Pursuant to the Disciplinary Order, respondent was to have complied with rule 9.20, subdivision (a) by November 15, 2016, and was to have filed a declaration of compliance, as required by rule 9.20, subdivision (c), by November 24, 2016. Respondent failed to file a rule 9.20 compliance declaration by the due date.

5. On December 16, 2016, respondent's probation deputy sent a letter to respondent at his membership records mailing address regarding respondent's failure to comply with rule 9.20 and specifically warned respondent that failure to comply would result in a disciplinary referral to the Office of Chief Trial Counsel. A courtesy copy of this letter was also sent to respondent's membership records email address on December 16, 2016. Respondent received the December 16, 2016 letter and email.

6. On February 1, 2017, respondent's probation deputy sent respondent a probation non-compliance letter to his membership records mailing address. A courtesy copy of this letter was also

sent to respondent's membership records email address. Respondent received the February 1, 2017 letter and email.

7. On April 17, 2017, respondent tardily filed his rule 9.20 declaration, 144 days late.

#### CONCLUSIONS OF LAW:

8. By failing to file a timely declaration of compliance with California Rules of Court, rule 9.20, in conformity with the requirements of rule 9.20(c) with the clerk of the State Bar Court by November 24, 2016, as required by the Supreme Court Disciplinary Order, respondent willfully violated California Rules of Court, rule 9.20.

#### Case No. 17-O-00990

#### FACTS:

9. Pursuant to the Disciplinary Order, the conditions of respondent's probation included a requirement that he contact the Office of Probation to schedule a meeting with his probation deputy within 30 days of the effective date of discipline, by November 14, 2016, which he did not do. Furthermore, respondent was to file his first quarterly report with the Office of Probation by January 10, 2017 and his second quarterly report by April 10, 2017. In his quarterly reports, respondent was required to state whether he complied with the State Bar act, the Rules of Professional Conduct, and all conditions of probation during the preceding calendar quarter in addition to stating whether any proceedings were pending against him in the State bar Court. To date, respondent has not filed the January 10<sup>th</sup> and April 10<sup>th</sup> quarterly reports.

#### CONCLUSIONS OF LAW:

10. By failing to contact the Office of Probation to schedule a meeting within 30 days of the effective date of discipline; failing to hold the required meeting with his probation deputy; and failing to submit his January 10, 2017 and April 10, 2017 quarterly reports, respondent failed to comply with all conditions attached to his disciplinary probation in willful violation of Business and Professions Code section 6068(k).

#### AGGRAVATING CIRCUMSTANCES.

**Prior Record of Discipline (Std. 1.5(a)):** Respondent has two prior records of discipline.

Respondent's first discipline, case no. 14-O-03258 (S224939), became effective on June 6, 2015 and involved violations of Business and Professions Code section 6068(a) [failure to support laws of this state] and Rules of Professional Conduct, rule 4-200(A) [collecting an unconscionable fee]. In that matter, respondent was assigned to act as a fiduciary for a client's estate and charged \$66,394.50 over a 10-month period, between May 19, 2010 and March 15, 2011, despite the fact that professional fiduciaries typically only receive one percent of the estate per year. Accordingly, respondent overbilled by approximately \$58,789.54. In aggravation, respondent failed to make restitution. In mitigation, respondent had no prior record of discipline, presented evidence of his good character and entered into a pre-filing stipulation with the State Bar. Respondent was suspended for two years, stayed, and placed on two years' probation with conditions including that he be actually suspended for the first six months

of his probation and until he paid restitution of \$48,789.54, plus interest. Respondent was also ordered to comply with California Rules of Court, rule 9.20. Respondent remains actually suspended as a result of his first discipline.

Respondent's second discipline, case nos. 15-O-13478-YDR, 15-N-15118 (S235534), consisted of a three-year suspension, stayed, and three years' probation with conditions including that he be actually suspended from the practice of law for the first two years of his probation, and until he proves to the State Bar Court that he is rehabilitated, is currently morally fit to practice law, and has current learning and ability in the general law pursuant to Standard 1.2(c)(1). Respondent was also ordered to comply with rule 9.20. The misconduct included respondent's failure to comply with California Rules of Court, rule 9.20, as ordered in his first discipline, because he did not provide his client and opposing counsel notice of his suspension within 30 days of his suspension and was thereby unable to file his declaration that he had performed all the acts required by rule 9.20 between July 2015 and May 2016. Respondent also appeared in court on behalf of a client while he was suspended on June 9, 2015, and thereby engaged in the unauthorized practice of law in violation of Business and Professions Code sections 6068(a), 6125 and 6126, and committed an act of moral turpitude in violation of 6106. In mitigation, respondent entered into a pre-trial stipulation with the State Bar. The discipline became effective on October 15, 2016. Respondent remains actually suspended as a result of his second prior.

**Multiple Acts of Wrongdoing (Std. 1.5(b)):** Respondent's misconduct includes five violations of conditions attached to his prior discipline.

**Indifference (Std. 1.5(k)):** Respondent's failure to timely comply with rule 9.20, despite having been disciplined for the same misconduct in his second prior, in addition to failing to even belatedly file his first two quarterly reports, attests to his indifference toward rectification or atonement for his misconduct.

#### **ADDITIONAL FACTS RE MITIGATING CIRCUMSTANCES.**

**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].) However, the weight of this factor in mitigation is tempered by the fact that respondent has stipulated to facts and culpability that were easily provable.

#### **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 Silvertown* (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. (Std. 1.7(b) and (c).)

California Rules of Court, rule 9.20(d) specifically suggests a range of discipline for violation of that rule. Rule 9.20 (d) states: “A suspended member’s willful failure to comply with the provisions of this rule is a cause for disbarment or suspension and for revocation of any pending probation” and further provides that failure to comply with the rule may be punished as contempt or a crime. The fact that the legislature considers non-compliance with rule 9.20 a potential crime, in addition to an act of professional misconduct, speaks to the serious nature of 9.20 violations. The seriousness of respondent’s violation in this case is exacerbated by his failure to make any effort to be compliant despite receiving a reminder letter and a rule 9.20 non-compliance letter from the Office of Probation. Respondent’s disregard of his professional responsibilities in this regard supports disbarment.

Further, Standard 1.8(b) provides that if a respondent has a record of two or more prior records of discipline, disbarment is appropriate if actual suspension was ordered in any of the prior disciplinary matters; the prior disciplinary matters, coupled with the current record, demonstrate a pattern of misconduct; or the prior disciplinary matters coupled with the current record demonstrate the member’s unwillingness or inability to conform to ethical responsibilities. In this case, two of the above-referenced circumstances are applicable because actual suspension of six months and until payment of restitution was ordered in respondent’s first disciplinary matter, and two years’ actual suspension and until compliance with Standard 1.2(c)(1) was ordered in his second disciplinary matter. Moreover, respondent’s prior disciplinary matters, coupled with the current case, demonstrate his unwillingness or inability to conform to his ethical responsibilities.

Case law on violations of rule 9.20 also supports disbarment. (*Bercovich v. State Bar* (1990) 50 Cal.3d 116, 131 [“disbarment is generally the appropriate sanctions for a willful violation of rule 955 [now rule 9.20]”]; also quoted in *In the Matter of Grueneich*, (Review Dept. 1993) 2 Cal. State Bar Ct. Rptr. 439, 442, 442; and in *In the Matter of Babero* (Review Dept. 1993) 2 Cal. State Bar Ct. Rptr. 322, 332.)

Here, California Rules of Court, rule 9.20, case law and the Standards mandate disbarment in order to ensure 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.

#### **COSTS OF DISCIPLINARY PROCEEDINGS.**

Respondent acknowledges that the Office of Chief Trial Counsel has informed respondent that as of April 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.


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| In the Matter of:<br>ALAN DOUGLAS NEGRON | Case number(s):<br>17-N-00628<br>17-O-00990 |
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### 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.

|                  |   |                     |
|------------------|---|---------------------|
| <u>5-10-2017</u> |  | Alan Douglas Negrón |
| Date             | Respondent's Signature  | Print Name          |

|                 |   |                       |
|-----------------|---|-----------------------|
| <u>6-1-2017</u> |  | Caitlin M. Elen-Morin |
| Date            | Deputy Trial Counsel's Signature  | Print Name            |

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| In the Matter of:<br>ALAN DOUGLAS NEGRON | Case Number(s):<br>17-N-00628<br>17-O-00990 |
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### DISBARMENT ORDER

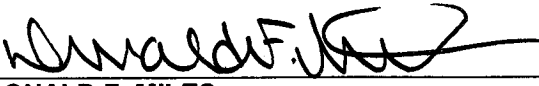
Finding the stipulation to be fair to the parties and that it adequately protects the public, IT IS ORDERED that the requested dismissal of counts/charges, if any, is GRANTED without prejudice, and:

- ☒ The stipulated facts and disposition are APPROVED and the DISCIPLINE RECOMMENDED to the Supreme Court.
- ☐ 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.

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.) **The effective date of this disposition is the effective date of the Supreme Court order herein, normally 30 days after file date. (See rule 9.18(a), California Rules of Court.)**

Respondent ALAN DOUGLAS NEGRON is ordered transferred to involuntary inactive status pursuant to Business and Professions Code section 6007, subdivision (c)(4). Respondent's inactive enrollment will be effective three (3) calendar days after this order is served by mail and will terminate upon the effective date of the Supreme Court's order imposing discipline herein, or as provided for by rule 5.111(D)(2) of the Rules of Procedure of the State Bar of California, or as otherwise ordered by the Supreme Court pursuant to its plenary jurisdiction.

6/16/17  
Date

  
DONALD F. MILES  
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 June 16, 2017, I deposited a true copy of the following document(s):

STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND ORDER  
APPROVING; ORDER OF INVOLUNTARY INACTIVE ENROLLMENT

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:

ALAN D. NEGRON  
1894 STOW ST  
SIMI VALLEY, CA 93063

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

CAITLIN M. ELEN-MORIN, Enforcement, Los Angeles

I hereby certify that the foregoing is true and correct. Executed in Los Angeles, California, on June 16, 2017.

  
Louisa Ayrapetyan  
Case Administrator  
State Bar Court