

PUBLIC MATTER

1 STATE BAR OF CALIFORNIA
2 OFFICE OF CHIEF TRIAL COUNSEL
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FILED

DEC 20 2018

**STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES**

STATE BAR COURT

HEARING DEPARTMENT - LOS ANGELES

12 In the Matter of:) Case Nos. 17-O-04373; 17-O-04374; 17-O-
13 GRENVILLE THOMAS PRIDHAM,) 04375; 17-O-04376; 17-O-04377; 17-O-
14 No. 120695,) 04378; and 18-O-17838
15 A Member of the State Bar.) NOTICE OF DISCIPLINARY CHARGES

NOTICE - FAILURE TO RESPOND!

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

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

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1 The State Bar of California alleges:

2 JURISDICTION

3 1. Grenville Thomas Pridham ("respondent") was admitted to the practice of law in the
4 State of California on November 16, 1985, was a member at all times pertinent to these charges,
5 and is currently a member of the State Bar of California.

6
7 COUNT ONE

8 Case No. 17-O-04373
9 Rules of Professional Conduct, former Rule 3-110(A)
[Failure to Perform with Competence]

10 2. On or about October 29, 2012, Mariko Tahara, employed respondent to perform legal
11 services, namely to file a civil complaint against Clarence Roland to recover funds paid by
12 Mariko Tahara to Clarence Roland for services related to the foreclosure of Mariko Tahara's
13 home, *Barber et al. v. Clarence Roland*, Orange County Superior Court case no. 30-2013-
14 00663316-CU-FR-CJC, which respondent intentionally, recklessly, or repeatedly failed to
15 perform with competence, in willful violation of Rules of Professional Conduct, rule 3-110(A),
16 by the following:

- 17 A. Failure to appear at a Case Management Conference on November 14, 2013;
- 18 B. Failure to appear at a Case Management Conference on December 4, 2014;
- 19 C. Failure to appear at an Order to Show Cause re Dismissal on February 24, 2016;
- 20 D. Failure to prepare and file a Request for Entry of Default for the court's review and
21 signature; and
- 22 E. Failure to file a Motion to Set Aside the Dismissal after the case was dismissed,
23 without prejudice, on February 24, 2016.

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COUNT TWO

Case No. 17-O-04373
Business and Professions Code, Section 6068(m)
[Failure to Inform Client of Significant Developments]

3. Respondent failed to keep respondent's client, Mariko Tahara, reasonably informed of significant developments in a matter, *Barber et al. v. Roland*, Orange County Superior Court case no. 30-2013-00663316-CU-FR-CJC, in which respondent had agreed to provide legal services, in willful violation of Business and Professions Code, section 6068(m), by failing to inform the client of the following:

A. The matter of *Barber et al. v. Clarence Roland*, was dismissed, without prejudice, on February 24, 2016.

COUNT THREE

Case No. 17-O-04373
Rules of Professional Conduct, former Rule 3-700(A)(2)
[Improper Withdrawal from Employment]

4. Respondent failed, upon termination of employment, to take reasonable steps to avoid reasonably foreseeable prejudice to respondent's client, Mariko Tahara, by constructively terminating respondent's employment on January 20, 2016, by failing to take any action on the client's behalf after respondent appeared at an Order to Show Cause re Dismissal on January 20, 2016, in *Barber et al. v. Clarence Roland*, Orange County Superior Court case no. 30-2013-00663316-CU-FR-CJC, and thereafter failing to inform the client that respondent was withdrawing from employment, in willful violation of the Rules of Professional Conduct, rule 3-700(A)(2).

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COUNT FOUR

Case No. 17-O-04373
Rules of Professional Conduct, former Rule 4-100(B)(3)
[Failure to Render Accounts of Client Funds]

5. On or between March 27, 2013, to May 15, 2013, respondent received from respondent's client, Mariko Tahara, the sum of \$2,512 as advanced fees for legal services to be performed. Respondent thereafter failed to render an appropriate accounting to the client regarding those funds following the termination of respondent's employment on or about January 20, 2016, in willful violation of the Rules of Professional Conduct, rule 4-100(B)(3).

COUNT FIVE

Case No. 17-O-04373
Business and Professions Code, section 6106
[Moral Turpitude - Misrepresentation]

6. On or about April 20, 2016, respondent stated to Mariko Tahara that in the next two weeks he would prepare a Motion for Entry of Default so that the defendant in the matter of *Barber et al. v. Clarence Roland*, Orange County Superior Court case no. 30-2013-00663316-CU-FR-CJC, could be served with the Motion for Entry of Default when respondent knew that statements was false and misleading. Respondent thereby committed an act involving moral turpitude, dishonesty or corruption in willful violation of Business and Professions Code, section 6106.

7. A violation of section 6106 may result from intentional conduct or grossly negligent conduct. Respondent is charged with committing intentional misrepresentation. However, should the evidence at trial demonstrate that respondent committed misrepresentation as a result of gross negligence, respondent must still be found culpable of violating section 6106 because misrepresentation through gross negligence is a lesser included offense of intentional misrepresentation.

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COUNT SIX

Case No. 17-O-04373
Business and Professions Code, section 6106
[Moral Turpitude - Misrepresentation]

8. On or about May 13, 2016, respondent stated in writing, via text message, to Mariko Tahara that he was working on affidavits for a Motion for Entry of Default against the defendant in *Barber et al. v. Clarence Roland*, Orange County Superior Court case no. 30-2013-00663316-CU-FR-CJC, when respondent knew that statements was false and misleading. Respondent thereby committed an act involving moral turpitude, dishonesty or corruption in willful violation of Business and Professions Code, section 6106.

9. A violation of section 6106 may result from intentional conduct or grossly negligent conduct. Respondent is charged with committing intentional misrepresentation. However, should the evidence at trial demonstrate that respondent committed misrepresentation as a result of gross negligence, respondent must still be found culpable of violating section 6106 because misrepresentation through gross negligence is a lesser included offense of intentional misrepresentation.

COUNT SEVEN

Case No. 17-O-04374
Rules of Professional Conduct, former Rule 3-110(A)
[Failure to Perform with Competence]

10. On or about January 15, 2013, Yvonne Barber, employed respondent to perform legal services, namely to file a civil complaint against Clarence Roland to recover funds paid by Yvonne Barber to Clarence Roland for services related to the foreclosure of Yvonne Barber's home, *Barber et al. v. Clarence Roland*, Orange County Superior Court case no. 30-2013-00663316-CU-FR-CJC, which respondent intentionally, recklessly, or repeatedly failed to perform with competence, in willful violation of Rules of Professional Conduct, rule 3-110(A), by the following:

- A. Failure to appear at a Case Management Conference on November 14, 2013;

- 1 B. Failure to appear at a Case Management Conference on December 4, 2014;
2 C. Failure to appear at an Order to Show Cause re Dismissal on February 24, 2016;
3 D. Failure to prepare and file a Request for Entry of Default for the court's review and
4 signature; and
5 E. Failure to file a Motion to Set Aside the Dismissal after the case was dismissed,
6 without prejudice, on February 24, 2016.

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8 COUNT EIGHT

9 Case No. 17-O-04374
10 Business and Professions Code, Section 6068(m)
[Failure to Inform Client of Significant Developments]

11 11. Respondent failed to keep respondent's client, Yvonne Barber, reasonably informed
12 of significant developments in a matter, *Barber et al. v. Roland*, Orange County Superior Court
13 case no. 30-2013-00663316-CU-FR-CJC, in which respondent had agreed to provide legal
14 services, in willful violation of Business and Professions Code, section 6068(m), by failing to
15 inform the client of the following:

- 16 A. The matter of *Barber et al. v. Clarence Roland*, was dismissed, without prejudice,
17 on February 24, 2016.

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19 COUNT NINE

20 Case No. 17-O-04374
21 Rules of Professional Conduct, former Rule 3-700(A)(2)
[Improper Withdrawal from Employment]

22 12. Respondent failed, upon termination of employment, to take reasonable steps to avoid
23 reasonably foreseeable prejudice to respondent's client, Yvonne Barber, by constructively
24 terminating respondent's employment on January 20, 2016, by failing to take any action on the
25 client's behalf after respondent appeared at an Order to Show Cause re Dismissal on January 20,
26 2016, in *Barber et al. v. Clarence Roland*, Orange County Superior Court case no. 30-2013-
27 00663316-CU-FR-CJC, and thereafter failing to inform the client that respondent was
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1 withdrawing from employment, in willful violation of the Rules of Professional Conduct, rule 3-
2 700(A)(2).

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4 COUNT TEN

5 Case No. 17-O-04374
6 Rules of Professional Conduct, former Rule 4-100(B)(3)
7 [Failure to Render Accounts of Client Funds]

8 13. On or about March 27, 2013, respondent received from respondent's client, Yvonne
9 Barber, the sum of \$850 as advanced fees for legal services to be performed. Respondent
10 thereafter failed to render an appropriate accounting to the client regarding those funds following
11 the termination of respondent's employment on or about January 20, 2016, in willful violation of
12 the Rules of Professional Conduct, rule 4-100(B)(3).

13 COUNT ELEVEN

14 Case No. 17-O-04375
15 Rules of Professional Conduct, former Rule 3-110(A)
16 [Failure to Perform with Competence]

17 14. On or about May 1, 2013, Bea Chun, employed respondent to perform legal services,
18 namely to file a civil complaint against Clarence Roland to recover funds paid by Bea Chun to
19 Clarence Roland for services related to the foreclosure of Bea Chun's home, *Barber et al. v.*
20 *Clarence Roland*, Orange County Superior Court case no. 30-2013-00663316-CU-FR-CJC,
21 which respondent intentionally, recklessly, or repeatedly failed to perform with competence, in
22 willful violation of Rules of Professional Conduct, rule 3-110(A), by the following:

- 23 A. Failure to appear at a Case Management Conference on November 14, 2013;
24 B. Failure to appear at a Case Management Conference on December 4, 2014;
25 C. Failure to appear at an Order to Show Cause re Dismissal on February 24, 2016;
26 D. Failure to prepare and file a Request for Entry of Default for the court's review and
27 signature; and
28 E. Failure to file a Motion to Set Aside the Dismissal after the case was dismissed,

1 without prejudice, on February 24, 2016.

2 COUNT TWELVE

3 Case No. 17-O-04375
4 Business and Professions Code, Section 6068(m)
[Failure to Inform Client of Significant Developments]

5
6 15. Respondent failed to keep respondent's client, Bea Chun, reasonably informed of
7 significant developments in a matter, *Barber et al. v. Roland*, Orange County Superior Court
8 case no. 30-2013-00663316-CU-FR-CJC, in which respondent had agreed to provide legal
9 services, in willful violation of Business and Professions Code, section 6068(m), by failing to
10 inform the client of the following:

11 A. The matter of *Barber et al. v. Clarence Roland*, was dismissed, without prejudice,
12 on February 24, 2016.

13 COUNT THIRTEEN

14 Case No. 17-O-04375
15 Rules of Professional Conduct, former Rule 3-700(A)(2)
[Improper Withdrawal from Employment]

16 16. Respondent failed, upon termination of employment, to take reasonable steps to avoid
17 reasonably foreseeable prejudice to respondent's client, Bea Chun, by constructively terminating
18 respondent's employment on January 20, 2016, by failing to take any action on the client's
19 behalf after respondent appeared at an Order to Show Cause re Dismissal on January 20, 2016, in
20 *Barber et al. v. Clarence Roland*, Orange County Superior Court case no. 30-2013-00663316-
21 CU-FR-CJC, and thereafter failing to inform the client that respondent was withdrawing from
22 employment, in willful violation of the Rules of Professional Conduct, rule 3-700(A)(2).

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COUNT FOURTEEN

Case No. 17-O-04375
Rules of Professional Conduct, former Rule 4-100(B)(3)
[Failure to Render Accounts of Client Funds]

17. On or about May 7, 2013, respondent received from respondent's client, Bea Chun, the sum of \$1,750 as advanced fees for legal services to be performed. Respondent thereafter failed to render an appropriate accounting to the client regarding those funds following the termination of respondent's employment on or about January 20, 2016, in willful violation of the Rules of Professional Conduct, rule 4-100(B)(3).

COUNT FIFTEEN

Case No. 17-O-04376
Rules of Professional Conduct, former Rule 3-110(A)
[Failure to Perform with Competence]

18. On or about May 1, 2013, Anwar Hossain, employed respondent to perform legal services, namely to file a civil complaint against Clarence Roland to recover funds paid by Anwar Hossain to Clarence Roland for services related to the foreclosure of Anwar Hossain's home, *Barber et al. v. Clarence Roland*, Orange County Superior Court case no. 30-2013-00663316-CU-FR-CJC, which respondent intentionally, recklessly, or repeatedly failed to perform with competence, in willful violation of Rules of Professional Conduct, rule 3-110(A), by the following:

- A. Failure to appear at a Case Management Conference on November 14, 2013;
- B. Failure to appear at a Case Management Conference on December 4, 2014;
- C. Failure to appear at an Order to Show Cause re Dismissal on February 24, 2016;
- D. Failure to prepare and file a Request for Entry of Default for the court's review and signature; and
- E. Failure to file a Motion to Set Aside the Dismissal after the case was dismissed, without prejudice, on February 24, 2016.

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COUNT SIXTEEN

Case No. 17-O-04376
Business and Professions Code, Section 6068(m)
[Failure to Inform Client of Significant Developments]

19. Respondent failed to keep respondent's client, Anwar Hossain, reasonably informed of significant developments in a matter, *Barber et al. v. Roland*, Orange County Superior Court case no. 30-2013-00663316-CU-FR-CJC, in which respondent had agreed to provide legal services, in willful violation of Business and Professions Code, section 6068(m), by failing to inform the client of the following:

A. The matter of *Barber et al. v. Clarence Roland*, was dismissed, without prejudice, on February 24, 2016.

COUNT SEVENTEEN

Case No. 17-O-04376
Rules of Professional Conduct, former Rule 3-700(A)(2)
[Improper Withdrawal from Employment]

20. Respondent failed, upon termination of employment, to take reasonable steps to avoid reasonably foreseeable prejudice to respondent's client, Anwar Hossain, by constructively terminating respondent's employment on January 20, 2016, by failing to take any action on the client's behalf after respondent appeared at an Order to Show Cause re Dismissal on January 20, 2016, in *Barber et al. v. Clarence Roland*, Orange County Superior Court case no. 30-2013-00663316-CU-FR-CJC, and thereafter failing to inform the client that respondent was withdrawing from employment, in willful violation of the Rules of Professional Conduct, rule 3-700(A)(2).

COUNT EIGHTEEN

Case No. 17-O-04377
Rules of Professional Conduct, former Rule 3-110(A)
[Failure to Perform with Competence]

21. On or about November 27, 2012, Ray and Taeko Perdido, employed respondent to perform legal services, namely to file a civil complaint against Clarence Roland to recover funds

1 paid by Ray and Taeko Perdido to Clarence Roland for services related to the foreclosure of Ray
2 and Taeko Perdido's home, *Barber et al. v. Clarence Roland*, Orange County Superior Court
3 case no. 30-2013-00663316-CU-FR-CJC, which respondent intentionally, recklessly, or
4 repeatedly failed to perform with competence, in willful violation of Rules of Professional
5 Conduct, rule 3-110(A), by the following:

- 6 A. Failure to appear at a Case Management Conference on November 14, 2013;
- 7 B. Failure to appear at a Case Management Conference on December 4, 2014;
- 8 C. Failure to appear at an Order to Show Cause re Dismissal on February 24, 2016;
- 9 D. Failure to prepare and file a Request for Entry of Default for the court's review and
10 signature; and
- 11 E. Failure to file a Motion to Set Aside the Dismissal after the case was dismissed,
12 without prejudice, on February 24, 2016.

13
14 COUNT NINETEEN

15 Case No. 17-O-04377
16 Business and Professions Code, Section 6068(m)
[Failure to Inform Client of Significant Developments]

17 22. Respondent failed to keep respondent's clients, Ray and Taeko Perdido, reasonably
18 informed of significant developments in a matter, *Barber et al. v. Roland*, Orange County
19 Superior Court case no. 30-2013-00663316-CU-FR-CJC, in which respondent had agreed to
20 provide legal services, in willful violation of Business and Professions Code, section 6068(m),
21 by failing to inform the client of the following:

- 22 A. The matter of *Barber et al. v. Clarence Roland*, was dismissed, without prejudice,
23 on February 24, 2016.

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COUNT TWENTY

Case No. 17-O-04377
Rules of Professional Conduct, former Rule 3-700(A)(2)
[Improper Withdrawal from Employment]

23. Respondent failed, upon termination of employment, to take reasonable steps to avoid reasonably foreseeable prejudice to respondent's clients, Ray and Taeko Perdido, by constructively terminating respondent's employment on January 20, 2016, by failing to take any action on the client's behalf after respondent appeared at an Order to Show Cause re Dismissal on January 20, 2016, in *Barber et al. v. Clarence Roland*, Orange County Superior Court case no. 30-2013-00663316-CU-FR-CJC, and thereafter failing to inform the client that respondent was withdrawing from employment, in willful violation of the Rules of Professional Conduct, rule 3-700(A)(2).

COUNT TWENTY-ONE

Case No. 17-O-04377
Rules of Professional Conduct, former Rule 4-100(B)(3)
[Failure to Render Accounts of Client Funds]

24. On or about March 27, 2013, respondent received from respondent's client, Ray and Taeko Perdido, the sum of \$1,750 as advanced fees for legal services to be performed. Respondent thereafter failed to render an appropriate accounting to the client regarding those funds following the termination of respondent's employment on or about January 20, 2016, in willful violation of the Rules of Professional Conduct, rule 4-100(B)(3).

COUNT TWENTY-TWO

Case No. 17-O-04378
Rules of Professional Conduct, former Rule 3-110(A)
[Failure to Perform with Competence]

25. On or about November 2, 2012, Miyoko Skelton, employed respondent to perform legal services, namely to file a civil complaint against Clarence Roland to recover funds paid by Miyoko Skelton to Clarence Roland for services related to the foreclosure of Miyoko Skelton's

1 home, *Barber et al. v. Clarence Roland*, Orange County Superior Court case no. 30-2013-
2 00663316-CU-FR-CJC, which respondent intentionally, recklessly, or repeatedly failed to
3 perform with competence, in willful violation of Rules of Professional Conduct, rule 3-110(A),
4 by the following:

- 5 A. Failure to appear at a Case Management Conference on November 14, 2013;
- 6 B. Failure to appear at a Case Management Conference on December 4, 2014;
- 7 C. Failure to appear at an Order to Show Cause re Dismissal on February 24, 2016;
- 8 D. Failure to prepare and file a Request for Entry of Default for the court's review and
9 signature; and
- 10 E. Failure to file a Motion to Set Aside the Dismissal after the case was dismissed,
11 without prejudice, on February 24, 2016.

12
13 COUNT TWENTY-THREE

14 Case No. 17-O-04378
15 Business and Professions Code, Section 6068(m)
[Failure to Inform Client of Significant Developments]

16 26. Respondent failed to keep respondent's client, Miyoko Skelton, reasonably informed
17 of significant developments in a matter, *Barber et al. v. Roland*, Orange County Superior Court
18 case no. 30-2013-00663316-CU-FR-CJC, in which respondent had agreed to provide legal
19 services, in willful violation of Business and Professions Code, section 6068(m), by failing to
20 inform the client of the following:

- 21 A. The matter of *Barber et al. v. Clarence Roland*, was dismissed, without prejudice,
22 on February 24, 2016.

23
24 COUNT TWENTY-FOUR

25 Case No. 17-O-04378
26 Rules of Professional Conduct, former Rule 3-700(A)(2)
[Improper Withdrawal from Employment]

27 27. Respondent failed, upon termination of employment, to take reasonable steps to avoid
28 reasonably foreseeable prejudice to respondent's client, Miyoko Skelton, by constructively

1 terminating respondent's employment on January 20, 2016, by failing to take any action on the
2 client's behalf after respondent appeared at an Order to Show Cause re Dismissal on January 20,
3 2016, in *Barber et al. v. Clarence Roland*, Orange County Superior Court case no. 30-2013-
4 00663316-CU-FR-CJC, and thereafter failing to inform the client that respondent was
5 withdrawing from employment, in willful violation of the Rules of Professional Conduct, rule 3-
6 700(A)(2).

7
8 COUNT TWENTY-FIVE

9 Case No. 17-O-04378
10 Rules of Professional Conduct, former Rule 4-100(B)(3)
11 [Failure to Render Accounts of Client Funds]

12 28. On or between April 29, 2013, and May 7, 2013, respondent received from
13 respondent's client, Miyoko Skelton, the sum of \$3,512 as advanced fees for legal services to be
14 performed. Respondent thereafter failed to render an appropriate accounting to the client
15 regarding those funds following the termination of respondent's employment on or about January
16 20, 2016, in willful violation of the Rules of Professional Conduct, rule 4-100(B)(3).

17 COUNT TWENTY-SIX

18 Case No. 18-O-17838
19 Rules of Professional Conduct, former Rule 4-100(A)
20 [Commingling -- Payment of Personal Expenses from Client Trust Account]

21 29. Between on or about June 2013 to December 2015, respondent issued the following
22 checks from funds in respondent's client trust account at Wells Fargo Bank, account no.
23 xxxxxx5599, for the payment of personal expenses, in willful violation of the Rules of
24 Professional Conduct, rule 4-100(A):

<u>CHECK</u>	<u>PAYEE</u>	<u>\$AMT OF CHECK</u>
1011	Premier Business Centers	\$275
1013	Premier Business Centers	\$275.50
1014	Premier Business Centers	\$275.25

1	1015	Premier Business Centers	\$277.25
2	1016	Premier Business Centers	\$275.25
3	1017	Premier Business Centers	\$825.75
4	1020	Premier Business Centers	\$275.25
5	1021	Premier Business Centers	\$275.25
6	1022	Premier Business Centers	\$550.50
7	1027	Premier Business Centers	\$275.25
8	1028	Premier Business Centers	\$279.05
9	1029	Premier Business Centers	\$275.25
10	1030	Premier Business Centers	\$275.25
11	1031	Premier Business Centers	\$275.25
12	1032	Premier Business Centers	\$300
13	1033	Premier Business Centers	\$300
14	1039	Premier Business Centers	\$300
15	1040	Premier Business Centers	\$300
16	1038	Premier Business Centers	\$300.60
17	1037	Premier Business Centers	\$300.75
18	1041	Premier Business Centers	\$300
19	1042	Premier Business Centers	\$300
20	1043	Premier Business Centers	\$300
21	1044	Premier Business Centers	\$300
22	1045	Premier Business Centers	\$300
23	1048	Premier Business Centers	\$300
24	1050	Premier Business Centers	\$326.58
25	1052	Premier Business Centers	\$443.50

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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.

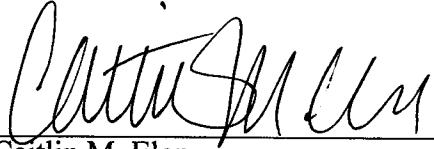
NOTICE - COST ASSESSMENT!

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

DATED: 12/20/2018

By: 
Caitlin M. Elen
Deputy Trial Counsel

DECLARATION OF SERVICE

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

CASE NUMBER(s): 17-O-04373; 17-O-04374; 17-O-04375; 17-O-04376; 17-O-04377; 17-O-04378; and 18-O-17838

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 2111 0162 34 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:.

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 20, 2018

SIGNED:

NATALIE FLORES
Declarant