

October 8, 2019

STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

THE STATE BAR OF CALIFORNIA  
OFFICE OF CHIEF TRIAL COUNSEL  
KEVIN TAYLOR, No. 151715  
180 Howard Street  
San Francisco, California 94105-1639  
Telephone: (415) 538-2000

**Public Matter**

IN THE STATE BAR COURT OF THE STATE BAR OF CALIFORNIA

IN THE MATTER OF THE ) Case No. SBC-19-C-30550  
CONVICTION OF: )  
) Transmittal of Records of Conviction of Attorney (Bus. & Prof.  
) Code §§ 6101-6102; Cal. Rules of Court, rule 9.5 et seq.)  
)  
MICHIKO LISA LINDSEY, ) (OCTC Case No. 19-C-20922)  
AKA MICHIKO LINDSEY- )  
SCHRODER )  
No. 203014 )  
)  
) [ X ] Misdemeanor;  
) [ X ] Crime(s) involves moral turpitude per se;  
Attorney ) [ X ] Hearing required to determine whether crime(s) involves  
) misconduct warranting discipline;  
) [ X ] Evidence that conviction is final.

To the CLERK OF THE STATE BAR COURT:

1. Transmittal of records.

- [ X ] A. Pursuant to the provisions of Business and Professions Code, section 6101-6102 and California Rules of Court, rule 9.5 et seq., the Office of Chief Trial Counsel transmits a certified copy of the record of convictions of the following attorney of the State Bar and for such consideration and action as the Court deems appropriate:
- [ ] B. Notice of Appeal
- [ X ] C. Evidence of Finality of Conviction (Court Docket)
- [ ] D. Other

Name of Licensee: Michiko Lisa LindseyDate licensee admitted to practice law or registered in California: December 1, 1999Licensee's Address of Record: 7215 Central AvenueLemon Grove, CA 91945-2219

2. Date and court of conviction; offense(s).

The record of conviction reflects that the above-named attorney of the State Bar was convicted as follows:

Date of entry of conviction: August 14, 2019Convicting court: U.S. District Court, Southern District of CaliforniaCase number(s): 19-CR-02021

Crime(s) of which convicted and classification(s): Violation of Title 42 U.S.C. §1307(a), fraud, one count, a misdemeanor involving moral turpitude as a matter of law. (Intent to defraud is moral turpitude. Crimes involving fraud or an intent to deceive are unquestionably moral turpitude. (*Jordan v. DeGeorge* (1951) 341 U.S. 223, 232.) Fraud is principal element of moral turpitude. (*In re Utz* (1989) 48 Cal.3d 468, 484.))

[ X ] 3. Compliance with Rule 9.20. (Applicable only if checked.)

We bring to the Court's attention that, should the Court enter an order of interim suspension herein, the Court may wish to require the above-named attorney to comply with the provisions of rule 9.20, California Rules of Court, paragraph (a), within 30 days of the effective date of any such order; and to file the affidavit with the Clerk of the State Bar Court provided for in paragraph (c) of rule 9.20 within 40 days of the effective date of said order, showing the attorney's compliance with the provisions of rule 9.20.

[ X ] 4. Other information to assist the State Bar Court re finality.

Pursuant to Federal Rules of Appellate Procedure, Rule 4(b)(1), a defendant's notice of appeal must be filed in the district court within 14 days after the entry of judgment. The attached certified docket, dated September 10, 2019, shows that no appeal was filed in this case after judgment was entered on August 14, 2019.

DOCUMENTS TRANSMITTED:

Certified copy of Information  
Certified copy of Plea Agreement  
Certified copy of Judgment  
Certified copy of Docket

THE STATE BAR OF CALIFORNIA  
OFFICE OF CHIEF TRIAL COUNSEL

DATED: October 8, 2019

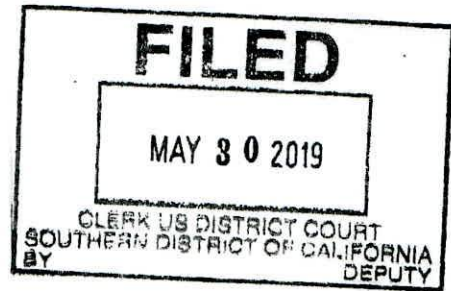
BY: 

Kevin B. Taylor  
Senior Trial Counsel

The Office of Chief Trial Counsel received the full set of Certified Record of Conviction on this matter on October 7, 2019.

A copy of this transmittal and its  
Attachments have been sent to:

Michiko Lisa Lindsey  
7215 Central Avenue  
Lemon Grove, CA 91945-2219



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
MICHIKO LINDSEY-SCHRODER,  
  
Defendant.

Case No. **19CR2021-LAB**

I N F O R M A T I O N

Title 42, U.S.C., Sec. 1307(a) -  
**Social Security Fraud**  
**(Misdemeanor)**

The United States Attorney charges:

Count 1

On or about October 30, 2015, within the Southern District of California, defendant MICHIKO LINDSEY-SCHRODER, with the intent to defraud, made and caused to be made representations with respect to the requirements of the Social Security Act (Title 42, United States Code, Chapter 7) and the rules and regulations issued thereunder, knowing such representations to be false - that is, Defendant knowingly represented on Verification Form SSA-L732 submitted in connection with beneficiary K.L.S.'s Social Security auxiliary child benefits that K.L.S. lived with Defendant from March 1, 2014 through February 28, 2015, when in truth and in fact, as Defendant then knew, K.L.S. did not



live with Defendant, in violation of Title 42, United States Code,  
Section 1307(a).

DATED: May 30, 2019.

Robert S. Brewer, Jr.  
United States Attorney

*Lisa J. Sanniti* (for)

LISA J. SANNITI  
Special Assistant U.S. Attorney

I hereby attest and certify on 9/30/19  
That the foregoing document is a full, true and correct  
copy of the original on file in my office and in my legal  
custody.

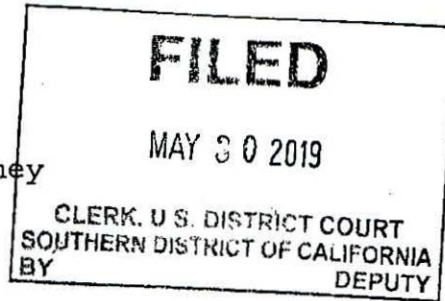
CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

*Burnett Anderson* Deputy



1 ROBERT S. BREWER, JR.  
United States Attorney  
2 LISA J. SANNITI  
Special Assistant United States Attorney  
3 Ohio Bar No. 86670  
Federal Office Building  
4 880 Front Street, Room 6293  
San Diego, California 92101-8893  
5 Telephone: (619) 546-8811  
Email: lisa.j.sanniti@usdoj.gov

6 Attorneys for United States of America



8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 MICHIKO LINDSEY-SCHRODER,

14 Defendant.

Case No. [\*\*CR\*\*\*\*-]

19 CR 2021-LAB

PLEA AGREEMENT

15 IT IS HEREBY AGREED between the plaintiff, UNITED STATES OF  
16 AMERICA, through its counsel, ROBERT S. BREWER, JR., United States  
17 Attorney, and Lisa J. Sanniti, Special Assistant United States Attorney,  
18 and Defendant MICHIKO LINDSEY-SCHRODER, with the advice and consent of  
19 Earll M. Pott, counsel for Defendant, as follows:

20 I

21 THE PLEA

22 Defendant agrees to waive Indictment and plead guilty to an  
23 Information charging Defendant with:

24 On or about October 30, 2015, within the Southern District of  
25 California, defendant MICHIKO LINDSEY-SCHRODER, with the  
26 intent to defraud, made and caused to be made representations  
27 with respect to the requirements of the Social Security Act  
(Title 42, United States Code, Chapter 7) and the rules and  
28 regulations issued thereunder, knowing such representations  
to be false - that is, Defendant knowingly represented on  
Verification Form SSA-L732 submitted in connection with

Plea Agreement

Def. Initials *mas*

\*\*CR\*\*\*\*-INI

beneficiary K.L.S.'s Social Security auxiliary child benefits that K.L.S. lived with Defendant from March 1, 2014 through February 28, 2015, when in truth and in fact, as Defendant then knew, K.L.S. did not live with Defendant, in violation of Title 42, United States Code, Section 1307(a).

In addition, the attached restitution addendum shall govern restitution in this case.

## II

### NATURE OF THE OFFENSE

#### A. ELEMENTS EXPLAINED

The offense to which Defendant is pleading guilty has the following elements:

1. The defendant made a representation;
2. The representation was false;
3. The defendant acted knowingly and with the intent to defraud; and
4. The representation concerned the requirements of the Social Security Act (Title 42, United States Code, Chapter 7) or any of the rules or regulations issued thereunder.

#### B. ELEMENTS UNDERSTOOD AND ADMITTED - FACTUAL BASIS

Defendant has fully discussed the facts of this case with defense counsel. Defendant has committed each element of the crime and admits that there is a factual basis for this guilty plea. The following facts are true and undisputed:

##### Identity

1. Defendant's true name is MICHIKO LINDSEY-SCHRODER.
2. Defendant was born on May 17, 1966.

##### Social Security Fraud

3. On February 16, 2011, Defendant filed for Social Security auxiliary child's benefits on behalf of her daughter, K.L.S., and the Social Security Administration (SSA) approved Defendant's application. Defendant also applied to be K.L.S.'s representative payee, which SSA approved. As part of the application process, SSA advised Defendant and Defendant acknowledged that, as K.L.S.'s representative payee, Defendant was required to use all of the payments for



1 K.L.S.'s needs only, and that Defendant was required to notify  
 2 SSA in the event K.L.S. left Defendant's custody. SSA advised  
 3 Defendant and Defendant acknowledged that Defendant could be  
 held criminally liable for misusing any of K.L.S.'s benefits,  
 and for making a false statement or representation of material  
 fact to SSA.

- 4 4. On February 19, 2013, Defendant lost custody of K.L.S.  
 Defendant failed to report to SSA that K.L.S. was no longer  
 5 living with Defendant or in Defendant's custody, as she knew  
 she was required to do.
- 6 5. On November 8, 2014, January 12, 2015, and October 30, 2015,  
 7 Defendant, as K.L.S.'s representative payee, completed forms  
 in connection with K.L.S.'s Social Security auxiliary child  
 8 benefits. On each report, Defendant falsely represented to  
 SSA (1) that K.L.S. lived with Defendant in San Diego,  
 9 California, and (2) that Defendant spent all of the benefits  
 on K.L.S.'s care and support, both representations that  
 10 concerned the requirements of the Social Security Act.  
 Defendant certified on each report that the information was  
 11 true to the best of her knowledge, and acknowledged that she  
 knew it was a crime to make a false statement or  
 12 representation of a material fact for use in determining a  
 right to payment under the Social Security Act.
- 13 6. Defendant made these false statements and representations  
 14 knowing they would affect SSA's ability under the Social  
 Security Act to assess K.L.S.'s eligibility for benefits and  
 15 Defendant's role as representative payee. Defendant did so  
 with the intent to defraud SSA by concealing from SSA that  
 16 K.L.S. was no longer in Defendant's custody in order to ensure  
 SSA continued to pay Defendant K.L.S.'s auxiliary child  
 17 benefits.
- 18 7. From March 3, 2013 through December 3, 2016, Defendant's false  
 19 representations caused SSA to improperly pay Defendant  
 \$48,456 in auxiliary child benefits.

### 20 III

#### 21 PENALTIES

22 The crime to which Defendant is pleading guilty carries the  
 23 following penalties:

- 24 A. a maximum 1 year in prison;
- 25 B. a maximum \$100,000 fine or twice the gross gain or twice the  
 26 gross loss, whichever is greatest;
- 27 C. a mandatory special assessment of \$25 per count;
- 28



1 D. a term of supervised release of up to 1 year. Failure to comply with  
2 any condition of supervised release may result in revocation  
3 of supervised release, requiring Defendant to serve in  
4 prison, upon revocation, all or part of the statutory maximum  
5 term of supervised release; and

6 E. In addition, Defendant shall be subject to an order of  
7 restitution to the Social Security Administration requiring  
8 Defendant to repay the agency at least \$48,456.

9 IV

10 **DEFENDANT'S WAIVER OF TRIAL RIGHTS AND**  
11 **UNDERSTANDING OF CONSEQUENCES**

12 This guilty plea waives Defendant's right at trial to:

13 A. Continue to plead not guilty and require the Government to  
14 prove the elements of the crime beyond a reasonable doubt;

15 B. A speedy and public trial by jury;

16 C. The assistance of counsel at all stages;

17 D. Confront and cross-examine adverse witnesses;

18 E. Testify and present evidence and to have witnesses testify on  
19 behalf of Defendant; and,

20 F. Not testify or have any adverse inferences drawn from the  
21 failure to testify.

22 V

23 **DEFENDANT ACKNOWLEDGES NO PRETRIAL RIGHT TO BE**  
24 **PROVIDED WITH IMPEACHMENT AND AFFIRMATIVE DEFENSE INFORMATION**

25 Any information establishing the factual innocence of Defendant  
26 known to the undersigned prosecutor in this case has been turned over  
27 to Defendant. The Government will continue to provide such information  
28 establishing the factual innocence of Defendant.

If this case proceeded to trial, the Government would be required  
to provide impeachment information for its witnesses. In addition, if  
Defendant raised an affirmative defense, the Government would be  
required to provide information in its possession that supports such a

1 defense. By pleading guilty Defendant will not be provided this  
2 information, if any, and Defendant waives any right to this information.  
3 Defendant will not attempt to withdraw the guilty plea or to file a  
4 collateral attack based on the existence of this information.

5 VI

6 **DEFENDANT'S REPRESENTATION THAT GUILTY**  
7 **PLEA IS KNOWING AND VOLUNTARY**

8 Defendant represents that:

- 9 A. Defendant has had a full opportunity to discuss all the facts  
10 and circumstances of this case with defense counsel and has  
11 a clear understanding of the charges and the consequences of  
12 this plea. By pleading guilty, Defendant may be giving up,  
13 and rendered ineligible to receive, valuable government  
14 benefits and civic rights, such as the right to vote, the  
15 right to possess a firearm, the right to hold office, and the  
16 right to serve on a jury. The conviction in this case may  
17 subject Defendant to various collateral consequences,  
18 including but not limited to revocation of probation, parole,  
19 or supervised release in another case; debarment from  
20 government contracting; and suspension or revocation of a  
21 professional license, none of which can serve as grounds to  
22 withdraw Defendant's guilty plea.
- 23 B. No one has made any promises or offered any rewards in return  
24 for this guilty plea, other than those contained in this  
25 agreement or otherwise disclosed to the Court.
- 26 C. No one has threatened Defendant or Defendant's family to  
27 induce this guilty plea.
- 28 D. Defendant is pleading guilty because Defendant is guilty and  
for no other reason.

VII

AGREEMENT LIMITED TO U.S. ATTORNEY'S OFFICE  
SOUTHERN DISTRICT OF CALIFORNIA

This plea agreement is limited to the United States Attorney's  
Office for the Southern District of California, and cannot bind any  
other authorities in any type of matter, although the Government will  
bring this plea agreement to the attention of other authorities if  
requested by Defendant.



## VIII

APPLICABILITY OF SENTENCING GUIDELINES

The sentence imposed will be based on the factors set forth in 18 U.S.C. § 3553(a). In imposing the sentence, the sentencing judge must consult the United States Sentencing Guidelines (Guidelines) and take them into account. Defendant has discussed the Guidelines with defense counsel and understands that the Guidelines are only advisory, not mandatory. The Court may impose a sentence more severe or less severe than otherwise applicable under the Guidelines, up to the maximum in the statute of conviction. The sentence cannot be determined until a presentence report is prepared by the U.S. Probation Office and defense counsel and the Government have an opportunity to review and challenge the presentence report. Nothing in this plea agreement limits the Government's duty to provide complete and accurate facts to the district court and the U.S. Probation Office.

## IX

SENTENCE IS WITHIN SOLE DISCRETION OF JUDGE

This plea agreement is made pursuant to Federal Rule of Criminal Procedure 11(c)(1)(B). The sentence is within the sole discretion of the sentencing judge who may impose the maximum sentence provided by statute. It is uncertain at this time what Defendant's sentence will be. The Government has not made and will not make any representation about what sentence Defendant will receive. Any estimate of the probable sentence by defense counsel is not a promise and is not binding on the Court. Any recommendation by the Government at sentencing also is not binding on the Court. If the sentencing judge does not follow any of



the parties' sentencing recommendations, Defendant will not withdraw the plea.

X

**PARTIES' SENTENCING RECOMMENDATIONS**

**A. SENTENCING GUIDELINE CALCULATIONS**

Although the Guidelines are only advisory and just one factor the Court will consider under 18 U.S.C. § 3553(a) in imposing a sentence, the parties will jointly recommend the following Base Offense Level, Specific Offense Characteristics, Adjustments, and Departures:

- |   |                 |
|---|-----------------|
| 1. Base Offense Level 2B1.1(a) (2)        | 6               |
| 2. Loss, § 2B1.1(b) (1) (D)               | +6              |
| 3. Acceptance of Responsibility [§ 3E1.1] | -2              |
| 4. Combination of Circumstances, § 5K2.0  | -2 <sup>1</sup> |

**B. ACCEPTANCE OF RESPONSIBILITY**

Despite paragraph A above, the Government need not recommend an adjustment for Acceptance of Responsibility if Defendant engages in conduct inconsistent with acceptance of responsibility including, but not limited to, the following:

1. Fails to truthfully admit a complete factual basis as stated in the plea at the time the plea is entered, or falsely denies, or makes a statement inconsistent with, the factual basis set forth in this agreement;
2. Falsely denies prior criminal conduct or convictions;
3. Is untruthful with the Government, the Court or probation officer; or
4. Breaches this plea agreement in any way.

<sup>1</sup> The combination of circumstances that warrant a 2-level downward departure includes Defendant's Mental and Emotional Conditions (USSG §5H1.3).

1 C. FURTHER ADJUSTMENTS AND SENTENCE REDUCTIONS INCLUDING THOSE  
2 UNDER 18 U.S.C. § 3553

3 Defendant may request or recommend additional downward  
4 adjustments, departures, or variances from the Sentencing Guidelines  
5 under 18 U.S.C. § 3553. The Government will oppose any downward  
6 adjustments, departures, or variances not set forth in Section X,  
7 paragraph A above.

8 D. NO AGREEMENT AS TO CRIMINAL HISTORY CATEGORY

9 The parties have no agreement as to Defendant's Criminal History  
10 Category.

11 E. "FACTUAL BASIS" AND "RELEVANT CONDUCT" INFORMATION

12 The facts in the "factual basis" paragraph of this agreement are  
13 true and may be considered as "relevant conduct" under USSG § 1B1.3 and  
14 as the nature and circumstances of the offense under 18 U.S.C.  
15 § 3553(a)(1).

16 F. PARTIES' RECOMMENDATIONS REGARDING CUSTODY

17 The Government will recommend that Defendant be sentenced to a  
18 three-year term of probation. If the Court imposes a term of probation,  
19 Defendant will not seek to reduce or terminate the term of probation  
20 until Defendant has served at least 2/3 of the term of probation and  
21 has fully paid and satisfied any special assessments, fine, or  
22 restitution judgment.

23 G. SPECIAL ASSESSMENT/FINE

24 1. Special Assessment

25 The parties will jointly recommend that defendant pay a special  
26 assessment in the amount of \$25.00 per Class A misdemeanor count of  
27 conviction to be paid forthwith at time of sentencing. Defendant shall  
28



1 pay the special assessment through the office of the Clerk of the  
2 District Court by bank or cashier's check or money order made payable  
3 to the "Clerk, United States District Court."

4 2. Fine

5 The parties have **no** agreement as to a fine recommendation.

6 H. SUPERVISED RELEASE

7 If the Court imposes a term of supervised release, Defendant will  
8 not seek to reduce or terminate early the term of supervised release  
9 until Defendant has served at least 2/3 of the term of supervised  
10 release and has fully paid and satisfied any special assessments, fine,  
11 criminal forfeiture judgment, and restitution judgment.

12 **XI**

13 **DEFENDANT WAIVES APPEAL AND COLLATERAL ATTACK**

14 Defendant waives (gives up) all rights to appeal and to  
15 collaterally attack every aspect of the conviction and sentence,  
16 including any restitution order up to \$96,912. The only exceptions are  
17 1) Defendant may appeal a custodial sentence above the high end of the  
18 guideline range recommended by the Government at sentencing (if USSG §  
19 5G1.1(b) applies, the high end of the range will be the statutorily  
20 required mandatory minimum sentence), and 2) Defendant may collaterally  
21 attack the conviction or sentence on the basis that Defendant received  
22 ineffective assistance of counsel. If Defendant appeals, the Government  
23 may support on appeal the sentence or restitution order actually  
24 imposed.

25 \\  
26 \\  
27 \\  
28



XII

BREACH OF THE PLEA AGREEMENT

Defendant and Defendant's attorney know the terms of this agreement and shall raise, before the sentencing hearing is complete, any claim that the Government has not complied with this agreement. Otherwise, such claims shall be deemed waived (that is, deliberately not raised despite awareness that the claim could be raised), cannot later be made to any court, and if later made to a court, shall constitute a breach of this agreement.

Defendant breaches this agreement if Defendant violates or fails to perform any obligation under this agreement. The following are non-exhaustive examples of acts constituting a breach:

1. Failing to plead guilty pursuant to this agreement;
2. Failing to fully accept responsibility as established in Section X, paragraph B, above;
3. Failing to appear in court;
4. Attempting to withdraw the plea;
5. Failing to abide by any court order related to this case;
6. Appealing (which occurs if a notice of appeal is filed) or collaterally attacking the conviction or sentence in violation of Section XI of this plea agreement; or
7. Engaging in additional criminal conduct from the time of arrest until the time of sentencing.

If Defendant breaches this plea agreement, Defendant will not be able to enforce any provisions, and the Government will be relieved of all its obligations under this plea agreement. For example, the Government may proceed to sentencing but recommend a different sentence

1 than what it agreed to recommend above. Or the Government may pursue  
2 any charges including those that were dismissed, promised to be  
3 dismissed, or not filed as a result of this agreement (Defendant agrees  
4 that any statute of limitations relating to such charges is tolled  
5 indefinitely as of the date all parties have signed this agreement;  
6 Defendant also waives any double jeopardy defense to such charges). In  
7 addition, the Government may move to set aside Defendant's guilty plea.  
8 Defendant may not withdraw the guilty plea based on the Government's  
9 pursuit of remedies for Defendant's breach.

10 Additionally, if Defendant breaches this plea agreement: (i) any  
11 statements made by Defendant, under oath, at the guilty plea hearing  
12 (before either a Magistrate Judge or a District Judge); (ii) the factual  
13 basis statement in Section II.B in this agreement; and (iii) any  
14 evidence derived from such statements, are admissible against Defendant  
15 in any prosecution of, or any action against, Defendant. This includes  
16 the prosecution of the charge that is the subject of this plea agreement  
17 or any charge(s) that the prosecution agreed to dismiss or not file as  
18 part of this agreement, but later pursues because of a breach by the  
19 Defendant. Additionally, Defendant knowingly, voluntarily, and  
20 intelligently waives any argument that the statements and any evidence  
21 derived from the statements should be suppressed, cannot be used by the  
22 Government, or are inadmissible under the United States Constitution,  
23 any statute, Rule 410 of the Federal Rules of Evidence, Rule 11(f) of  
24 the Federal Rules of Criminal Procedure, and any other federal rule.

25 \\  
26 \\  
27 \\  
28

XIII

CONTENTS AND MODIFICATION OF AGREEMENT

This plea agreement embodies the entire agreement between the parties and supersedes any other agreement, written or oral. No modification of this plea agreement shall be effective unless in writing signed by all parties.

XIV

DEFENDANT AND COUNSEL FULLY UNDERSTAND AGREEMENT

By signing this agreement, Defendant certifies that Defendant has read it (or that it has been read to Defendant in Defendant's native language). Defendant has discussed the terms of this agreement with defense counsel and fully understands its meaning and effect.

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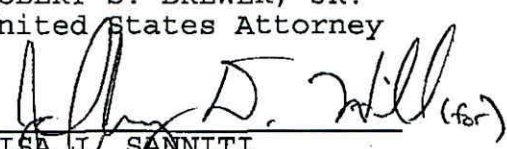
XV

DEFENDANT SATISFIED WITH COUNSEL

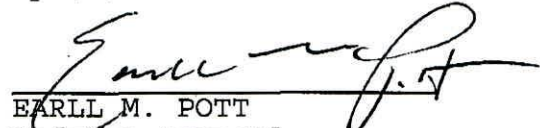
Defendant has consulted with counsel and is satisfied with counsel's representation. This is Defendant's independent opinion, and Defendant's counsel did not advise Defendant about what to say in this regard.

ROBERT S. BREWER, JR.  
United States Attorney

5/29/2019  
DATED

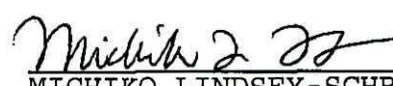
  
LISA J. SANNITI  
Special Assistant U.S. Attorney

5/28/2019  
DATED

  
EARLL M. POTT  
Defense Counsel

IN ADDITION TO THE FOREGOING PROVISIONS TO WHICH I AGREE, I SWEAR UNDER PENALTY OF PERJURY THAT THE FACTS IN THE "FACTUAL BASIS" SECTION ABOVE ARE TRUE.

5/28/19  
DATED

  
MICHIKO LINDSEY-SCHRODER  
Defendant


Approved By:

  
EMILY ALLEN

Chief, Major Frauds and Public Corruption Section

I hereby attest and certify on 9/30/19  
That the foregoing document is a full, true and correct  
copy of the original on file in my office and in my legal  
custody.

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

 Deputy

1 United States v. Michiko Lindsey-Schroder, Case No.

19cr2021 LAB

2 FINANCIAL ADDENDUM

3 1. This Financial Addendum is incorporated into and part of De-  
4 fendant's plea agreement, and the additional terms and warnings below  
5 apply.

6 A. Restitution

7 i. Based on the crime to which defendant is pleading  
8 guilty, the Court may order pursuant to 18 U.S.C. § 3663 that  
9 defendant make restitution to the victim of the offense of  
10 conviction.

11 ii. The amount of restitution ordered by the Court may in-  
12 clude restitution to any person directly harmed by the Defendant's  
13 criminal conduct in the course of the scheme, conspiracy, or pattern.  
14 If agreed to by the parties, the Court may also order restitution to  
15 persons other than the victim of the offense of conviction. Restitu-  
16 tion may include losses arising from counts dismissed and charges not  
17 prosecuted as well as all relevant conduct in connection with those  
18 counts and charges.

19 iii. The parties estimate the amount of restitution will be  
20 at least \$48,456. Defendant understands that this is only an esti-  
21 mate based on currently available information. The Government will  
22 recommend restitution of at least \$48,456, but the amount and recom-  
23 mendation may be higher depending on information at sentencing. The  
24 Court may impose restitution of any amount based on information  
25 available at sentencing. Defendant agrees that a restitution award in  
26 a higher amount is not grounds to withdraw Defendant's guilty plea.  
27 The Defendant also agrees that nothing in this plea agreement or fi-  
28 nancial addendum limits the Government's duty to provide complete and



1 accurate facts to the district court and the U.S. Probation Office to  
2 calculate restitution.

3           iv. Any payment schedule imposed by the Court establishes  
4 only a minimum obligation, and does not foreclose the United States  
5 from exercising all legal actions, remedies, and process available to  
6 collect the restitution judgment, including but not limited to reme-  
7 dies pursuant to 18 U.S.C. §§ 3613 and 3664(m)(1)(A). Defendant will  
8 make a good faith effort to pay the full restitution.

9           v. Based on currently available information, restitution  
10 shall be paid to or on behalf of the following victim:

<u>Victim</u>	<u>Amount</u>
Social Security Administration	\$48,456

13           B. FINE.

14           i. The parties have no agreement as to a fine recommenda-  
15 tion.

16           ii. Any payment schedule for a fine imposed by the Court  
17 establishes only a minimum obligation. Defendant will make a good  
18 faith effort to pay any fine. Regardless of Defendant's compliance,  
19 any payment schedule does not limit the United States' ability to  
20 collect additional amounts from Defendant through all available col-  
21 lection remedies at any time.

22 2. The restitution and fine shall be paid through the Office of the  
23 Clerk of the District Court by bank or cashier's check or money order  
24 referencing the criminal case number and made payable to the "Clerk,  
25 United States District Court."

26 3. Defendant consents and agrees that the United States may, upon  
27 execution of the plea agreement, run credit and other financial re-  
28

ports on Defendant using public and non-public databases and share such information with the Court and the U.S. Probation Office. Defendant also authorizes the Internal Revenue Service to transmit to the United States Attorney's Office copies of Defendant's tax returns until the fine and restitution are paid in full, and Defendant will promptly execute any documents necessary to carry out this authorization.

4. *Not later than 30 days after execution of the plea agreement,* Defendant shall complete and provide to the United States, under penalty of perjury, a financial disclosure form listing all Defendant's current and projected assets and financial interests valued at more than \$1,000. These include all assets and financial interests in which Defendant has an interest (or had an interest prior to February 19, 2013), direct or indirect, whether held in Defendant's name or in the name of another, in any property, real or personal, including marital and community property. Defendant shall also identify all assets valued at more than \$5,000 which have been transferred to any third party since February 19, 2013, including the location of the assets, the identity of the third party or parties, and the amount of consideration received by the Defendant for the transferred assets. Until the restitution and fine are paid in full, Defendant will provide complete, updated financial information to the Asset Recovery Section of the United States Attorney's Office promptly upon request.

5. From the date this plea agreement is executed until the fine and restitution are paid in full, Defendant shall immediately notify the Asset Recovery Section of the United States Attorney's Office of (i) any interest in property worth more than \$1,000 that Defendant



1 obtains, directly or indirectly, and (ii) any interest in property  
2 owned directly or indirectly by Defendant worth over \$1,000 that  
3 Defendant intends to transfer. This obligation includes any interest  
4 in property held or owned under any other name or entity, including a  
5 trust, partnership or corporation. The parties will jointly recommend  
6 that this requirement also be imposed as a condition of supervised  
7 release.

8 6. Until the fine and restitution is paid in full, Defendant shall  
9 immediately notify the Asset Recovery Section of the United States  
10 Attorney's Office of any material change in Defendant's financial  
11 condition.

12 7. Defendant agrees that notwithstanding any order by the Court re-  
13 garding the restitution and fine, the restitution and fine are due  
14 and payable in full immediately upon being sentenced for the offense.  
15 Defendant further understands and agrees the fine and restitution are  
16 delinquent until paid in full, regardless of any payment schedule im-  
17 posed by the Court or U.S. Probation. Until the fine and restitution  
18 are paid in full, Defendant agrees and consents to the entry of the  
19 unpaid fine and restitution into the Treasury Offset Program so that  
20 any federal payment or transfer of returned property to Defendant  
21 will be offset and applied to pay Defendant's unpaid fine and resti-  
22 tution. Defendant waives all rights to notices and all rights to  
23 contest any and all TOP offsets until the fine and restitution are  
24 paid in full, including all accrued interest on unpaid balance(s).

25 \\

26 \\

27 \\

Defendant understands that the main plea agreement and this financial addendum embody the entire plea agreement between the parties and supersedes any other agreement, written or oral.

5/28/19  
Date

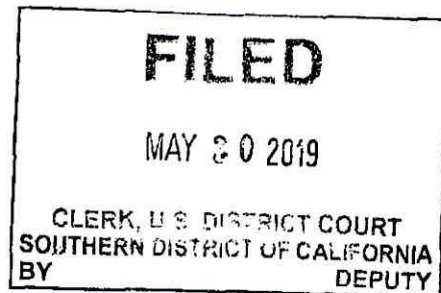
Michiko 2  
MICHIKO LINDSEY-SCHRODER  
Defendant

5/28/2019  
Date

Earl M. Pott  
EARL M. POTT  
Defense Counsel

5/29/2019  
Date

Robert S. Brewer, Jr.  
ROBERT S. BREWER, JR.  
United States Attorney  
LISA J. SANNITI  
Special Assistant U.S. Attorney



9/30/19  
I hereby attest and certify on 9/30/19  
That the foregoing document is a full, true and correct  
copy of the original on file in my office and in my legal  
custody.

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
Burnett Anderson Deputy



AO 245B (CASD Rev. 1/19) Judgment in a Criminal Case

**FILED**

AUG 14 2019

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
BY DEPUTY**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA****UNITED STATES OF AMERICA**  
**V.****JUDGMENT IN A CRIMINAL CASE**  
(For Offenses Committed On or After November 1, 1987)**MICHIKO LINDSEY-SCHRODER**Case Number: 19CR2021 **MDD****EARLL POTT**

Defendant's Attorney

USM Number 85584298

☐ -

THE DEFENDANT:

☒ pleaded guilty to count(s) 1 of the Misdemeanor Information☐ was found guilty on count(s) \_\_\_\_\_

after a plea of not guilty.

Accordingly, the defendant is adjudged guilty of such count(s), which involve the following offense(s):

<u>Title &amp; Section</u>	<u>Nature of Offense</u>	<u>Count Number(s)</u>
42:1307	Social Security Fraud (Misdemeanor)	1

The defendant is sentenced as provided in pages 2 through 5 of this judgment.  
The sentence is imposed pursuant to the Sentencing Reform Act of 1984.

☐ The defendant has been found not guilty on count(s) \_\_\_\_\_☐ Count(s) \_\_\_\_\_ are dismissed on the motion of the United States.

Assessment : \$25.00

☐ Pursuant to the motion of the United States under 18 USC 3573, the special assessment provided for under 18 USC 3013 is waived and remitted as uncollectible.☐ JVT Assessment\*: \$

\*Justice for Victims of Trafficking Act of 2015, Pub. L. No. 114-22.

☒ Fine waived ☐ Forfeiture pursuant to order filed \_\_\_\_\_, included herein.

IT IS ORDERED that the defendant must notify the United States Attorney for this district within 30 days of any change of name, residence, or mailing address until all fines, restitution, costs, and special assessments imposed by this judgment are fully paid. If ordered to pay restitution, the defendant must notify the court and United States Attorney of any material change in the defendant's economic circumstances.

August 13, 2019

Date of Imposition of Sentence



HON. MITCHELL D. DEMBIN

UNITED STATES MAGISTRATE JUDGE

AO 245B (CASD Rev. 1/19) Judgment in a Criminal Case

DEFENDANT: MICHIKO LINDSEY-SCHRODER  
CASE NUMBER: 19CR2021

Judgment - Page 2 of 4

### PROBATION

The defendant is hereby sentenced to probation for a term of:  
5 years' probation

### MANDATORY CONDITIONS

1. The defendant must not commit another federal, state or local crime.
2. The defendant must not unlawfully possess a controlled substance.
3. The defendant must not illegally possess a controlled substance. The defendant must refrain from any unlawful use of a controlled substance. The defendant must submit to one drug test within 15 days of release from imprisonment and at least two periodic drug tests thereafter as determined by the court. Testing requirements will not exceed submission of more than 4 drug tests per month during the term of supervision, unless otherwise ordered by the court.  
☒ The above drug testing condition is suspended, based on the court's determination that the defendant poses a low risk of future substance abuse. (check if applicable)
4. ☒ The defendant must make restitution in accordance with 18 U.S.C. §§ 3663 and 3663A or any other statute authorizing a sentence of restitution. (check if applicable)
5. ☒ The defendant must cooperate in the collection of DNA as directed by the probation officer. (check if applicable)
6. ☐ The defendant must comply with the requirements of the Sex Offender Registration and Notification Act (34 U.S.C. § 20901, et seq.) as directed by the probation officer, the Bureau of Prisons, or any state sex offender registration agency in the location where the defendant resides, works, is a student, or was convicted of a qualifying offense. (check if applicable)
7. ☐ The defendant must participate in an approved program for domestic violence. (check if applicable)
8. The defendant must pay the assessment imposed in accordance with 18 U.S.C. § 3013.
9. If this judgment imposes a fine, the defendant must pay in accordance with the Fine sheet of this judgment.
10. The defendant must notify the court of any material change in their economic circumstances that might affect their ability to pay restitution, fines, or special assessments.

The defendant must comply with the standard conditions that have been adopted by this court as well as with any other conditions on the attached page.



AO 245B (CASD Rev. 1/19) Judgment in a Criminal Case

DEFENDANT: MICHIKO LINDSEY-SCHRODER  
CASE NUMBER: 19CR2021

Judgment - Page 3 of 4

### STANDARD CONDITIONS OF SUPERVISION

As part of the defendant's probation, the defendant must comply with the following standard conditions of supervision. These conditions are imposed because they establish the basic expectations for the defendant's behavior while on supervision and identify the minimum tools needed by probation officers to keep informed, report to the court about, and bring about improvements in the defendant's conduct and condition.

1. The defendant must report to the probation office in the federal judicial district where they are authorized to reside within 72 hours of their release from imprisonment, unless the probation officer instructs the defendant to report to a different probation office or within a different time frame.
2. After initially reporting to the probation office, the defendant will receive instructions from the court or the probation officer about how and when the defendant must report to the probation officer, and the defendant must report to the probation officer as instructed.
3. The defendant must not knowingly leave the federal judicial district where the defendant is authorized to reside without first getting permission from the court or the probation officer.
4. The defendant must answer truthfully the questions asked by their probation officer.
5. The defendant must live at a place approved by the probation officer. If the defendant plans to change where they live or anything about their living arrangements (such as the people living with the defendant), the defendant must notify the probation officer at least 10 days before the change. If notifying the probation officer in advance is not possible due to unanticipated circumstances, the defendant must notify the probation officer within 72 hours of becoming aware of a change or expected change.
6. The defendant must allow the probation officer to visit them at any time at their home or elsewhere, and the defendant must permit the probation officer to take any items prohibited by the conditions of their supervision that he or she observes in plain view.
7. The defendant must work full time (at least 30 hours per week) at a lawful type of employment, unless the probation officer excuses the defendant from doing so. If the defendant does not have full-time employment the defendant must try to find full-time employment, unless the probation officer excuses the defendant from doing so. If the defendant plans to change where the defendant works or anything about their work (such as their position or their job responsibilities), the defendant must notify the probation officer at least 10 days before the change. If notifying the probation officer at least 10 days in advance is not possible due to unanticipated circumstances, the defendant must notify the probation officer within 72 hours of becoming aware of a change or expected change.
8. The defendant must not communicate or interact with someone they know is engaged in criminal activity. If the defendant knows someone has been convicted of a felony, they must not knowingly communicate or interact with that person without first getting the permission of the probation officer.
9. If the defendant is arrested or questioned by a law enforcement officer, the defendant must notify the probation officer within 72 hours.
10. The defendant must not own, possess, or have access to a firearm, ammunition, destructive device, or dangerous weapon (i.e., anything that was designed, or was modified for, the specific purpose of causing bodily injury or death to another person such as nunchakus or tasers).
11. The defendant must not act or make any agreement with a law enforcement agency to act as a confidential human source or informant without first getting the permission of the court.
12. If the probation officer determines the defendant poses a risk to another person (including an organization), the probation officer may require the defendant to notify the person about the risk and the defendant must comply with that instruction. The probation officer may contact the person and confirm that the defendant notified the person about the risk.
13. The defendant must follow the instructions of the probation officer related to the conditions of supervision.

DEFENDANT: MICHIKO LINDSEY-SCHRODER  
CASE NUMBER: 19CR2021

Judgment - Page 4 of 4

**SPECIAL CONDITIONS OF SUPERVISION**

14. **Submit to and complete mental health counseling and/or treatment as directed by the probation officer; take all medications as prescribed by a medical professional and do not discontinue medication without approval of a medical professional.**
15. **Release of Presentence report and available psychological reports to the defendant's medical provider as directed and approved by the probation officer as well as the reciprocal release of information between the probation officer and defendant's medical provider.**
16. **Defendant required to report to the probation officer any motor vehicle in which defendant owns, operates or has an interest in.**
17. **Defendant required to submit her person and property to a search to be conducted by a probation officer only when a reasonable suspicion of a violation of the defendant's terms of probation exist and that the areas to be searched contain evidence of such violation(s). Any search must be conducted at a reasonable time and manner.**
18. **Provide a complete disclosure of personal and business financial records as directed by probation officer.**
19. **Notify collections unit of the U.S. Attorney's office of any interest in property defendant has obtained either directly or indirectly; defendant must notify the collections unit of the U.S. Attorney's office before transferring any interest in property.**



AO 245S (CASD Rev. 08/13) Judgment in a Criminal Case

DEFENDANT: MICHIKO LINDSEY-SCHRODER  
CASE NUMBER: 19CR2021-MDD

Judgment - Page 5 of 5

### RESTITUTION

The defendant shall pay restitution in the amount of \$48,456.00 unto the United States of America.

Pay restitution in the amount of **\$48,456.00** to Social Security Administration through the Clerk, U. S. District Court. Payment of restitution shall be forthwith. During any period of incarceration the defendant shall pay restitution through the Inmate Financial Responsibility Program at the rate of 50% of the defendant's income, or \$25.00 per quarter, whichever is greater. The defendant shall pay the restitution during her supervised release at the rate of \$250.00 per month. These payment schedules do not foreclose the United States from exercising all legal actions, remedies, and process available to it to collect the restitution judgment.

Until restitution has been paid, the defendant shall notify the Clerk of the Court and the United States Attorney's Office of any change in the defendant's mailing or residence address, no later than thirty (30) days after the change occurs.

I hereby attest and certify on 9/30/19  
That the foregoing document is a full, true and correct  
copy of the original on file in my office and in my legal  
custody.

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

Burnett A. Anderson Deputy

[Type text]

CLOSED,FIN

**U.S. District Court  
Southern District of California (San Diego)  
CRIMINAL DOCKET FOR CASE #: 3:19-cr-02021-MDD-1**

Case title: USA v. Lindsey-Schroder

Date Filed: 05/30/2019

Date Terminated: 08/14/2019

Assigned to: Magistrate  
Judge Mitchell D.  
Dembin

**Defendant (1)**

**Michiko Lindsey-  
Schroder**

*TERMINATED:*  
08/14/2019  
85584298

represented by **Earll M Pott**

KLINEDINST PC  
501 W. Broadway  
Suite 600  
San Diego, CA 92101  
619-239-8131  
Fax: 619-238-8707  
Email:  
EPOTT@KLINEDINSTLAW.COM

*LEAD ATTORNEY  
ATTORNEY TO BE NOTICED  
Designation: Retained*

**Pending Counts**

42:1307(a) - Social  
Security Fraud  
(Misdemeanor)  
(1)

**Disposition**

Defendant sentenced to 5 years  
probation; \$25 PA due; fine waived

**Highest Offense Level**



**(Opening)**

Misdemeanor

**Terminated Counts**

None

**Disposition****Highest Offense Level**  
**(Terminated)**

None

**Complaints**

None

**Disposition****Plaintiff**

USA

represented by **Jeffrey D. Hill**United States Attorney  
Federal Office Building  
880 Front Street  
Room 6293San Diego, CA 92101-8893  
619-546-7924

Email:

Jeffrey.Hill@usdoj.gov

*TERMINATED: 05/31/2019**LEAD ATTORNEY**ATTORNEY TO BE**NOTICED**Designation: Assistant United  
States Attorney***Lisa Jeannette Sanniti**

880 Front Street

Suite 6293

San Diego, CA 92101

619-546-8811

Email:

lisa.j.sanniti@usdoj.gov

*LEAD ATTORNEY**ATTORNEY TO BE**NOTICED**Designation: Assistant United States Attorney*

<b>Date Filed</b>	<b>#</b>	<b>Docket Text</b>
05/30/2019	<u>1</u>	MISDEMEANOR INFORMATION as to Michiko Lindsey-Schroder (1) count(s) 1. (dls) (Entered: 05/30/2019)
05/30/2019	2	Minute Entry for proceedings held before Magistrate Judge Michael J. Seng: Initial Appearance as to Michiko Lindsey-Schroder (present) held on 5/30/2019. Defense counsel Earl Pott (RET) makes a general appearance for defendant. Bond set as to Michiko Lindsey-Schroder (1) \$5,000 P/S secured by Defendant's signature. Arraignment on Misdemeanor Information (Class A) as to Michiko Lindsey-Schroder (1) Count 1 held on 5/30/2019. Not Guilty plea entered. Change of Plea Hearing as to Michiko Lindsey-Schroder held on 5/30/2019. Plea entered by Michiko Lindsey-Schroder (1) as to Count 1 of the Misdemeanor Information Michiko Lindsey-Schroder (1). PSR Ordered; Sentence With PSR set for 8/13/2019 09:00 AM before Magistrate Judge Ruben B. Brooks. Class A consent and plea agreement filed. (CD# 5/30/2019 MJS: 133-205). (Plaintiff Attorney Jeffrey Hill, AUSA). (Defendant Attorney Earl Pott, RET). (PTSO: M. Chavez). (dls) (Entered: 05/30/2019)
05/30/2019	<u>3</u>	CONSENT TO PROCEED BEFORE US MAGISTRATE JUDGE by Michiko Lindsey-Schroder



		(Class A). (dls) (Entered: 05/30/2019)
05/30/2019	<u>4</u>	ORDER Setting Conditions of Release. Bond set for Michiko Lindsey-Schroder (1) \$5,000 P/S. Signed by Magistrate Judge Michael J. Seng on 5/30/2019. (tcf) (Entered: 05/31/2019)
05/30/2019	<u>6</u>	PLEA AGREEMENT as to Michiko Lindsey-Schroder (Attachments: # <u>1</u> Financial Addendum)(ag) (Entered: 05/31/2019)
05/30/2019	<u>7</u>	ABSTRACT OF ORDER Releasing Michiko Lindsey-Schroder. (ag) (mdc) (Entered: 05/31/2019)
05/31/2019	<u>5</u>	NOTICE OF ATTORNEY APPEARANCE Lisa Jeannette Sanniti appearing for USA. (Sanniti, Lisa) Attorney Lisa Jeannette Sanniti added to party USA (pty:pla) (ag). (Entered: 05/31/2019)
05/31/2019	<u>8</u>	P/S Bond Filed as to Michiko Lindsey-Schroder in amount of \$ 5,000.00. Signed by Magistrate Judge Michael J. Seng. (Document applicable to USA, Michiko Lindsey-Schroder.) (ag) (Entered: 05/31/2019)
07/09/2019	<u>9</u>	PRE-SENTENCE REPORT as to Michiko Lindsey-Schroder. Report prepared by: Lisa DeLaney. (Document applicable to USA, Michiko Lindsey-Schroder.) (Pitts, P.) (tcf). (Entered: 07/09/2019)
07/17/2019	<u>10</u>	NOTICE OF CHANGE OF HEARING as to Defendant Michiko Lindsey-Schroder. Sentence With PSR reset for 8/13/2019 01:30 PM before Magistrate Judge Mitchell D. Dembin. (no document attached) (vtl) (Entered: 07/17/2019)
08/06/2019	<u>11</u>	SENTENCING MEMORANDUM by Michiko Lindsey-Schroder (Pott, Earll) (mme). (Entered: 08/06/2019)
08/06/2019	<u>12</u>	SENTENCING SUMMARY CHART by Michiko Lindsey-Schroder (Pott, Earll) (mme). (Entered: 08/06/2019)

08/06/2019	<u>13</u>	SENTENCING SUMMARY CHART by USA as to Michiko Lindsey-Schroder (Sanniti, Lisa) (mme). (Entered: 08/06/2019)
08/13/2019	<u>14</u>	Minute Entry for proceedings held before Magistrate Judge Mitchell D. Dembin: Sentence With PSR Hearing held on 8/13/2019 for Michiko Lindsey-Schroder (1) (present), Count(s) 1, Defendant sentenced to 5 years probation; \$25 PA due; fine waived; Defendant ordered to pay restitution. Magistrate Judge Ruben B. Brooks is no longer assigned to case and Magistrate Judge Mitchell D. Dembin is now assigned to the case. The new case number is 19CR2021-MDD. Statement of reasons completed; judgment filed. Defendant's appeal rights waived. (CD# 8/13/2019 MDD: 335-355). (Plaintiff Attorney Lisa Sanniti, AUSA). (Defendant Attorney Earll Pott, RET). (USPO: D. Horton). (no document attached) (dls) (Entered: 08/14/2019)
08/14/2019	<u>15</u>	JUDGMENT as to Michiko Lindsey-Schroder (1), Count(s) 1, Defendant sentenced to 5 years probation; \$25 PA due; fine waived. Signed by Magistrate Judge Mitchell D. Dembin (ag) (Entered: 08/15/2019)

I hereby attest and certify on 9/30/19  
 That the foregoing document is a full, true and correct  
 copy of the original on file in my office and in my legal  
 custody.

CLERK, U.S. DISTRICT COURT  
 SOUTHERN DISTRICT OF CALIFORNIA

Burns Anderson Deputy



**DECLARATION OF SERVICE BY CERTIFIED MAIL**

**CASE NUMBER: 19-C-20922**

I, the undersigned, over the age of eighteen (18) years, whose business address and place of employment is the State Bar of California, 180 Howard Street, San Francisco, California 94105, declare that I am not a party to the within action; that 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; that in the ordinary course of the State Bar of California's practice, correspondence collected and processed by the State Bar of California would be deposited with the United States Postal Service that same day; that I am aware that on motion of 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; and that in accordance with the practice of the State Bar of California for collection and processing of mail, I deposited or placed for collection and mailing in the City and County of San Francisco, on the date shown below, a true copy of the within

**TRANSMITTAL OF RECORDS OF CONVICTION OF ATTORNEY, including:**

**Certified copy of Information  
Certified copy of Plea Agreement  
Certified copy of Judgment  
Certified copy of Docket**

in a sealed envelope placed for collection and mailing as certified mail, return receipt requested, Article No.: 9414 7266 9904 2152 1802 91, at San Francisco, on the date shown below, addressed to:


**Michiko Lisa Lindsey  
7215 Central Ave  
Lemon Grove, CA 91945-2219**

in an inter-office mail facility regularly maintained by the State Bar of California addressed to:

**N/A**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at San Francisco, California, on the date shown below.

DATED: October 8, 2019

Signed: 

Ina M. Strehle  
Declarant