

Public Matter

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6/18/2019

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

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STATE BAR OF CALIFORNIA
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STATE BAR COURT

HEARING DEPARTMENT - LOS ANGELES

In the Matter of:

GLENN TODD ROSEN,
No. 156151,

A Member of the State Bar.

) Case No. **SBC-19-O-30293**
)
) NOTICE OF DISCIPLINARY CHARGES
)
) (OCTC Case No. 18-O-13698; 18-O-14754;
) 18-O-16189; 18-O-17183; 18-O-933302; 19-
) O-10128)

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.**

1 The State Bar of California alleges:

2 JURISDICTION

3 1. Glenn Todd Rosen ("respondent") was admitted to the practice of law in the State of
4 California on December 16, 1991, was a member at all times pertinent to these charges, and is
5 currently a member of the State Bar of California.

6 COUNT 1

7 Case No. 18-O-13698
8 Rules of Professional Conduct, former Rule 3-410
9 [Failure to Disclose Lack of Professional Liability Insurance]

10 2. On or about January 11, 2016, respondent contracted with clients Houshang and
11 Farivesh Beroukhim ("the Beroukhims"), to pursue a property damage claim against the city of
12 Los Angeles on their behalf.

13 3. Respondent's retainer agreement with the Beroukhims, dated January 11, 2016, did
14 not include any reference to the fact that respondent did not maintain professional liability
15 insurance at the time he was retained, in willful violation of the Rules of Professional Conduct,
16 former rule 3-410.

17 4. In October 2017, the Beroukhims and the City of Los Angeles agreed to settle the
18 dispute for \$350,000, of which \$193,417.26 represented the Beroukhim's share of the settlement
19 proceeds.

20 5. In November 2017, the Beroukhims's portion of the settlement funds was unlawfully
21 intercepted by a third-party.

22 6. On December 11, 2017, respondent sent a written communication to the Beroukhim's
23 stating, "I regret to inform you that the Rosen Law Firm's portion of the settlement for legal fees
24 and reimbursed costs has been expended in its entirety in satisfying its financial obligations, and
25 neither it nor I have any assets nor insurance to satisfy the theft of your share of the settlement,"
26 which was the first time the Beroukhim's became aware that respondent lacked professional
27 liability insurance.
28

7. By failing to disclose to the Beroukhims, in writing, that respondent did not have professional liability insurance at the time the Beroukhims hired him, on January 11, 2016, respondent willfully violated former rule 3-410 of the Rules of Professional Conduct.

COUNT 2

Case No. 18-O-13698
Business and Professions Code, section 6068(i)
[Failure to Cooperate in State Bar Investigation]

8. Respondent failed to cooperate and participate in a disciplinary investigation pending against respondent by failing to provide a substantive response to the State Bar's letters of August 29, 2018 and September 25, 2018, which respondent received, that requested respondent's response to the allegations of misconduct being investigated in case no.18-O-13698, in willful violation of Business and Professions Code, section 6068(i).

COUNT 3

Case No. 18-O-14754
Rules of Professional Conduct, former rule 3-110(A)
[Failure to Perform with Competence]

9. On or about September 6, 2017, Pedram Eliasnik employed respondent to perform legal services, namely to bring a civil action against the broker and sellers of a triplex, that Mr. Eliasnik purchased. Respondent intentionally, recklessly, or repeatedly failed to perform with competence, in willful violation of Rules of Professional Conduct, former rule 3-110(A), by failing to prepare and file a lawsuit against the broker and seller of the triplex that Mr Eliasnik purchased, pursuant to their retainer agreement.

COUNT 4

Case No. 18-O-14754
Business and Professions Code, section 6068(m)
[Failure to Respond to Client Inquiries]

10. Respondent failed to respond promptly to approximately five written, reasonable status inquiries made by respondent's client, Pedram Eliasnik, between March 12, 2018 and June 19, 2018, that respondent received in a matter in which respondent had agreed to provide legal services, in willful violation of Business and Professions Code, section 6068(m).

1 COUNT 5

2 Case No. 18-O-14754
3 Business and Professions Code, section 6106
4 [Moral Turpitude - Misrepresentation]

5 11. On or about March 14, 2018, respondent stated in writing to client Pedram Eliasnik
6 that "your case with the mortgage broker was filed. I'm waiting for them to respond. No worries
7 about the statute of limitations. I'll keep you posted," when respondent knew that his statements
8 were false and misleading. Respondent thereby committed an act involving moral turpitude,
9 dishonesty or corruption in willful violation of Business and Professions Code, section 6106.

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

14 COUNT 6

15 Case No. 18-O-14754
16 Business and Professions Code, section 6106
17 [Moral Turpitude - Misrepresentation]

18 13. On or about September 21, 2018, respondent stated in writing to State Bar
19 Investigator Kevin Lindarto, "Please know that I have returned the \$5,000 deposit to Mr.
20 Eliasnik. If I can be of further assistance, please let me know," when respondent knew that his
21 statement was false and misleading. Respondent thereby committed an act involving moral
22 turpitude, dishonesty or corruption in willful violation of Business and Professions Code, section
23 6106.

24 14. A violation of section 6106 may result from intentional conduct or grossly negligent
25 conduct. Respondent is charged with committing intentional misrepresentation. However,
26 should the evidence at trial demonstrate that respondent committed misrepresentation as a result
27 of gross negligence, respondent must still be found culpable of violating section 6106 because
28

1 misrepresentation through gross negligence is a lesser included offense of intentional
2 misrepresentation.

3 COUNT 7

4 Case No. 18-O-14754
5 Rules of Professional Conduct, former rule 4-100(B)(3)
6 [Failure to Render Accounts of Client Funds]

7 15. On or about September 7, 2017, respondent received from respondent's client,
8 Pedram Eliasnik, the sum of \$5,000 as advanced fees for legal services to be performed.
9 Respondent thereafter failed to render an appropriate accounting to the client regarding those
10 funds following the termination of respondent's employment on or about June 19, 2018, in
11 willful violation of the Rules of Professional Conduct, former rule 4-100(B)(3).

12 COUNT 8

13 Case No. 18-O-14754
14 Rules of Professional Conduct, former rule 3-700(D)(2)
15 [Failure to Refund Unearned Fees]

16 16. On or about September 7, 2017 respondent received advanced fees of \$5,000 from a
17 client, Pedram Eliasnik, for legal services that included filing a lawsuit against the broker and
18 seller of a triplex that Mr. Eliasnik purchased. Respondent failed to bring any action against the
19 broker and seller of the triplex, or perform any legal services for the client, and therefore earned
20 none of the advanced fees paid. Respondent failed to return promptly, upon respondent's
21 termination of employment on or about June 19, 2018, any part of the \$5,000 fee to the client, in
22 willful violation of the Rules of Professional Conduct, former rule 3-700(D)(2).

23 COUNT 9

24 Case No. 18-O-14754
25 Business and Professions Code, section 6068(i)
26 [Failure to Cooperate in State Bar Investigation]

27 17. Respondent failed to cooperate and participate in a disciplinary investigation pending
28 against respondent by failing to provide a substantive response to the State Bar's letters dated
August 22, 2018 and September 7, 2018, and e-mail communications on September 23, 2018 and
October 1, 2018, which respondent received, that requested respondent's response to the

1 allegations of misconduct being investigated in case no.18-O-14754, in willful violation of
2 Business and Professions Code, section 6068(i).

3 COUNT 10

4 Case No. 18-O-16189
5 Rules of Professional Conduct, former rule 3-110(A)
6 [Failure to Perform with Competence]

7 18. On or about March 22, 2018, Temporary Placement Solutions, LLC dba TPS
8 Housing, through Housing Specialist Amy Kuhlman, employed respondent to perform legal
9 services, that included providing advice, counsel and representation with regard to TPS
10 Housing's contractual needs, which respondent intentionally, recklessly, or repeatedly failed to
11 perform with competence, in willful violation of Rules of Professional Conduct, former rule 3-
12 110(A), by failing to provide any legal services of value to TPS Housing.

13 COUNT 11

14 Case No. 18-O-16189
15 Business and Professions Code, section 6068(m)
16 [Failure to Respond to Client Inquiries]

17 19. Respondent failed to respond promptly to eight written, reasonable status inquiries
18 made by respondent's client, TPS Housing, between May 24, 2018 and July 11, 2018, that
19 respondent received in a matter in which respondent had agreed to provide legal services, in
20 willful violation of Business and Professions Code, section 6068(m).

21 COUNT 12

22 Case No. 18-O-16189
23 Rules of Professional Conduct, former rule 4-100(B)(3)
24 [Failure to Render Accounts of Client Funds]

25 20. On or about April 2, 2018, respondent received from respondent's client, TPS
26 Housing, the sum of \$2,500 as advanced fees for legal services to be performed. Respondent
27 thereafter failed to render an appropriate accounting to the client regarding those funds following
28 the termination of respondent's employment on or about August 22, 2018, in willful violation of
the Rules of Professional Conduct, former rule 4-100(B)(3).

//

1 COUNT 13

2 Case No. 18-O-16189
3 Rules of Professional Conduct, former rule 3-700(D)(2)
4 [Failure to Refund Unearned Fees]

5 21. On or about April 2, 2018 respondent received advanced fees of \$2,500 from client,
6 TPS Housing, representing an initial deposit. Respondent failed to provide counsel, advice and
7 representation with regard to client's contractual needs, or perform any legal services for the
8 client, and therefore earned none of the advanced fees paid. Respondent failed to return
9 promptly, upon respondent's termination of employment on or about August 22, 2018, any part
10 of the \$2,500 fee to the client, in willful violation of the Rules of Professional Conduct, former
11 rule 3-700(D)(2).

12 COUNT 14

13 Case No. 18-O-16189
14 Business and Professions Code, section 6068(i)
15 [Failure to Cooperate in State Bar Investigation]

16 22. Respondent failed to cooperate and participate in a disciplinary investigation pending
17 against respondent by failing to provide a substantive response to the State Bar's letters of
18 October 15, 2018 and October 31, 2018, which respondent received, that requested respondent's
19 response to the allegations of misconduct being investigated in case no.18-O-17183, in willful
20 violation of Business and Professions Code, section 6068(i).

21 COUNT 15

22 Case No. 18-O-17183
23 Rules of Professional Conduct, former rule 3-110(A)
24 [Failure to Perform with Competence]

25 23. On or about February 5, 2018, Farshad Farzan, the owner of Intelligent Measurement,
26 Inc., hired respondent to perform legal services, namely to pursue claims against Rony Atallah
27 aka Four R Machine Shop aka R Smog, for breach of lease and related damages, which
28 respondent intentionally, recklessly, or repeatedly failed to perform with competence, in willful
violation of Rules of Professional Conduct, former rule 3-110(A), by failing to provide any legal
services of value.

1 COUNT 16

2 Case No. 18-O-17183
3 Business and Professions Code, section 6068(m)
4 [Failure to Respond to Client Inquiries]

5 24. Respondent failed to respond promptly to four telephonic and three written,
6 reasonable status inquiries made by respondent's client, Farshad Farzan, between May 2, 2018
7 and July 23, 2018, that respondent received in a matter in which respondent had agreed to
8 provide legal services, in willful violation of Business and Professions Code, section 6068(m).

9 COUNT 17

10 Case No. 18-O-17183
11 Rules of Professional Conduct, rule 1.15(d)(4)
12 [Failure to Render Accounts of Client Funds]

13 25. On or about February 5, 2018, respondent received from respondent's client, Farshad
14 Farzan owner of Intelligent Measurement, Inc., the sum of \$1,500 as advanced fees for legal
15 services to be performed. Respondent thereafter failed to render an appropriate accounting to the
16 client regarding those funds following the termination of respondent's employment on or about
17 November 8, 2018, in willful violation of the Rules of Professional Conduct, rule 1.15(d)(4).

18 COUNT 18

19 Case No. 18-O-17183
20 Rules of Professional Conduct, rule 1.15(d)(7)
21 [Failure to Refund Unearned Fees]

22 26. On or about February 5, 2018, respondent received advanced fees of \$1,500 from
23 client, Farshad Farzan owner of Intelligent Measurement, Inc. Respondent failed to pursue
24 claims against Rony Atallah aka Four R Machine Shop aka R Smog for breach of lease and
25 damages related to client's real property, or perform any legal services for the client, and
26 therefore earned none of the advanced fees paid. Respondent failed to return promptly, upon
27 respondent's termination of employment on or about November 8, 2018, any part of the \$1,500
28 fee to the client, in willful violation of the Rules of Professional Conduct, rule 1.15(d)(7).

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1 COUNT 19

2 Case No. 18-O-17183
3 Rules of Professional Conduct, rule 1.16(e)(1)
4 [Failure to Release File]

5 27. Respondent failed to promptly release, after termination of respondent's employment
6 on or about November 8, 2018, to respondent's client, Farshad Farzan, owner of Intelligent
7 Measurement, Inc., all of the client's papers and property following the client's request for the
8 client's file on November 8, 2018, in willful violation of the Rules of Professional Conduct, rule
9 1.16(e)(1).

10 COUNT 20

11 Case No. 18-O-17183
12 Business and Professions Code, section 6068(i)
13 [Failure to Cooperate in State Bar Investigation]

14 28. Respondent failed to cooperate and participate in a disciplinary investigation pending
15 against respondent by failing to provide a substantive response to the State Bar's letters of
16 November 29, 2018 and December 14, 2018, which respondent received, that requested
17 respondent's response to the allegations of misconduct being investigated in case no.18-O-
18 16189, in willful violation of Business and Professions Code, section 6068(i).

19 COUNT 21

20 Case No. 18-O-933302
21 Rules of Professional Conduct, rule 1.15(a)
22 [Failure to Maintain Funds and Property of Client in Trust]

23 29. On or about November 13, 2018, respondent received on behalf of respondent's
24 client, Teresa Gutierrez, advanced fees of \$10,000. Respondent failed to deposit and maintain
25 the advanced funds received from Ms. Gutierrez, in his trust account, in willful violation of the
26 Rules of Professional Conduct, rule 1.15(a).

27 //

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1 COUNT 22

2 Case No. 18-O-933302
3 Rules of Professional Conduct, rule 1.1
4 [Failure to Perform with Competence]

5 30. On or about November 13, 2018, Teresa Gutierrez employed respondent to perform
6 legal services, namely resolve pending disputes with PCH Treatment Center and JY Properties,
7 LLC, which respondent intentionally, recklessly, or repeatedly failed to perform with
8 competence, in willful violation of Rules of Professional Conduct, rule 1.1 by failing to provide
9 any services of value to Ms. Gutierrez.

10 COUNT 23

11 Case No. 18-O-933302
12 Business and Professions Code, section 6068(m)
13 [Failure to Respond to Client Inquiries]

14 31. Respondent failed to respond promptly to approximately fifteen written, reasonable
15 status inquiries made by respondent's client, Teresa Gutierrez, and her daughter, Sofia Gutierrez,
16 between December 7, 2018 through March 1, 2019, that respondent received in a matter in which
17 respondent had agreed to provide legal services, in willful violation of Business and Professions
18 Code, section 6068(m).

19 COUNT 24

20 Case No. 18-O-933302
21 Business and Professions Code, section 6106
22 [Moral Turpitude - Misrepresentation]

23 32. On or about January 10, 2019, respondent stated in writing to Sofia Gutierrez that "I
24 am writing to let you know that status of the two projects for which I was hired by your mother
25 on behalf of your sister, Bella. With regard to PCH, I have, on several occasions now spoke with
26 Thomas Clifford, the admissions coordinator with PCH," when respondent knew the statement
27 was false and misleading. Respondent thereby committed an act involving moral turpitude,
28 dishonesty or corruption in willful violation of Business and Professions Code, section 6106.

33. A violation of section 6106 may result from intentional conduct or grossly negligent
conduct. Respondent is charged with committing intentional misrepresentation. However,

1 should the evidence at trial demonstrate that respondent committed misrepresentation as a result
2 of gross negligence, respondent must still be found culpable of violating section 6106 because
3 misrepresentation through gross negligence is a lesser included offense of intentional
4 misrepresentation.

5 COUNT 25

6 Case No. 18-O-933302
7 Business and Professions Code, section 6106
8 [Moral Turpitude - Misrepresentation]

9 34. On or about January 10, 2019, respondent stated in writing to Sofia Gutierrez, "I have
10 spoken with Joseph Yadegar, the chief representative of JY Properties, LLC ...Mr. Yadegar is not
11 inclined to merely let Bella out of her lease," when respondent knew that this statement was false
12 and misleading. Respondent thereby committed an act involving moral turpitude, dishonesty or
13 corruption in willful violation of Business and Professions Code, section 6106.

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

20 COUNT 26

21 Case No. 18-O-933302
22 Rules of Professional Conduct, rule 1.15(d)(4)
23 [Failure to Render Accounts of Client Funds]

24 36. On or about November 13, 2018, respondent received from respondent's client,
25 Teresa Gutierrez, the sum of \$10,000 as advanced fees for legal services to be performed.
26 Respondent thereafter failed to render an appropriate accounting to the client regarding those
27 funds following the termination of respondent's employment on or about December 17, 2018, in
28 willful violation of the Rules of Professional Conduct, rule 1.15(d)(4).

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1 COUNT 27

2 Case No. 18-O-933302
3 Rules of Professional Conduct, rule 1.16(e)(2)
4 [Failure to Refund Unearned Fees]

5 37. On or about November 13, 2018 respondent received advanced fees of \$10,000 from
6 a client, Teresa Gutierrez. Respondent failed to perform any legal services for the client, and
7 therefore earned none of the advanced fees paid. Respondent failed to return promptly, upon
8 respondent's termination of employment on or about December 17, 2018 any part of the \$10,000
9 fee to the client, in willful violation of the Rules of Professional Conduct, rule 1.16(e)(2).

10 COUNT 28

11 Case No. 18-O-933302
12 Business and Professions Code, section 6068(i)
13 [Failure to Cooperate in State Bar Investigation]

14 38. Respondent failed to cooperate and participate in a disciplinary investigation pending
15 against respondent by failing to provide a substantive response to the State Bar's letters of
16 March 12, 2019 and March 27, 2019, which respondent received, that requested respondent's
17 response to the allegations of misconduct being investigated in case no.18-O-933302, in willful
18 violation of Business and Professions Code, section 6068(i).

19 COUNT 29

20 Case No. 19-O-10128
21 Rules of Professional Conduct, Rule 1.1
22 [Failure to Perform with Competence]

23 39. On or about November 18, 2016, Rosalie Rains employed respondent to perform
24 legal services, namely to pursue claims against Ms. Rains' property insurer, Allstate Insurance,
25 which respondent intentionally, recklessly, or repeatedly failed to perform with competence, in
26 willful violation of Rules of Professional Conduct, rule 1.1, by failing to timely file an Opening
27 Brief on or before November 23, 2018, resulting in the dismissal of the appeal and the
28 underlying action brought by Ms. Rains against All State Insurance.

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COUNT 30

Case No. 19-O-10128
Business and Professions Code, section 6106
[Moral Turpitude - Misrepresentation]

40. On or about December 11, 2018, respondent stated in writing to Rosalie Rains that "The brief is being filed tomorrow and I will send you a copy. There is no cause for alarm," when respondent knew that statement 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.

41. 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 31

Case No. 19-O-10128
Business and Professions Code, section 6106
[Moral Turpitude - Misrepresentation]

42. On or about December 14, 2018, respondent stated in writing to Rosalie Rains, "I will get the case revived. I am confident. The brief will be accepted and we will move on," when respondent knew that statement 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.

43. 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

1 misrepresentation through gross negligence is a lesser included offense of intentional
2 misrepresentation.

3 COUNT 32

4 Case No. 19-O-10128
5 Business and Professions Code, section 6068(i)
[Failure to Cooperate in State Bar Investigation]

6 44. Respondent failed to cooperate and participate in a disciplinary investigation pending
7 against respondent by failing to provide a substantive response to the State Bar's letters of May
8 6, 2019 and May 22, 2019, which respondent received, that requested respondent's response to
9 the allegations of misconduct being investigated in case no.19-O-10128, in willful violation of
10 Business and Professions Code, section 6068(i).

11 **NOTICE - INACTIVE ENROLLMENT!**

12 **YOU ARE HEREBY FURTHER NOTIFIED THAT IF THE STATE BAR**
13 **COURT FINDS, PURSUANT TO BUSINESS AND PROFESSIONS CODE**
14 **SECTION 6007(c), THAT YOUR CONDUCT POSES A SUBSTANTIAL**
15 **THREAT OF HARM TO THE INTERESTS OF YOUR CLIENTS OR TO**
16 **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.

17 **NOTICE - COST ASSESSMENT!**

18 **IN THE EVENT THESE PROCEDURES RESULT IN PUBLIC**
19 **DISCIPLINE, YOU MAY BE SUBJECT TO THE PAYMENT OF COSTS**
20 **INCURRED BY THE STATE BAR IN THE INVESTIGATION, HEARING**
AND REVIEW OF THIS MATTER PURSUANT TO BUSINESS AND
PROFESSIONS CODE SECTION 6086.10.

21 Respectfully submitted,

22 THE STATE BAR OF CALIFORNIA
23 OFFICE OF CHIEF TRIAL COUNSEL

24
25 DATED: June 18, 2019

26 By: 

27 Trinidad Ocampo
28 Deputy Trial Counsel

DECLARATION OF SERVICE

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

CASE NUMBER(s): **18-O-13698, 18-O-14754, 18-O-16189, 18-O-17183, 18-O-933302, 19-O-10128**

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))

- 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 Los Angeles.



By U.S. Certified Mail: (CCP §§ 1013 and 1013(a))



By Overnight Delivery: (CCP §§ 1013(c) and 1013(d))

- I am readily familiar with the State Bar of California's practice for collection and processing of correspondence for overnight delivery by the United Parcel Service ("UPS").



By Fax Transmission: (CCP §§ 1013(e) and 1013(f))

Based on agreement of the parties to accept service by fax transmission, I faxed the documents to the persons at the fax numbers listed herein below. No error was reported by the fax machine that I used. The original record of the fax transmission is retained on file and available upon request.



By Electronic Service: (CCP § 1010.6)

Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the person(s) at the electronic addresses listed herein below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.



(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 0110 79 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)*

Person Served	Business-Residential Address	Fax Number	Courtesy Copy to:
Glenn T. Rosen	Rosen Law Firm, APC 149 S Barrington Ave. # 207 Los Angeles, CA 90049-3310	Electronic Address	

☐ 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"). 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, and for overnight delivery, deposited with delivery fees paid or provided for, with UPS that same day.

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: June 18, 2019

SIGNED:

Genelle De Luca-Suarez
Genelle De Luca-Suarez
Declarant