PUBLIC MATTER

FILED
FEB 22 2013
STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

STATE BAR COURT OF CALIFORNIA

HEARING DEPARTMENT - LOS ANGELES

In the Matter of **LETITIA ELISABETH PEPPER,** **Member No. 105277,** A Member of the State Bar.	Case No.: **11-O-19391-RAP** **DECISION**

Introduction[1]

In this contested disciplinary matter, the State Bar of California, Office of the Chief Trial Counsel (State Bar) charges respondent Letitia Elisabeth Pepper with two counts of misconduct, including the failure to obey a court order and the failure to report judicial sanctions to the State Bar.

The court finds, by clear and convincing evidence, that respondent is culpable of violating section 6103 by failing to obey a court order, but dismisses, for lack of clear and convincing evidence, the section 6068, subdivision (o)(3) charge alleging failure to report judicial sanctions. In view of respondent's misconduct and the evidence in aggravation and mitigation, the court imposes a public reproval with conditions on respondent.

[1] Unless otherwise indicated, all references to rules refer to the State Bar Rules of Professional Conduct. Furthermore, all statutory references are to the Business and Professions Code, unless otherwise indicated.

kwiktag® 152 143 172

Significant Procedural History

On July 27, 2012, the State Bar filed a Notice of Disciplinary Charges (NDC). Respondent filed a response on September 4, 2012.[2]

On November 26, 2012, the parties filed a Stipulation as to Admission of Documents with the court.

The parties appeared before the undersigned judge in this matter on November 27, 2012. The State Bar was represented by Senior Trial Counsel Rizamari C. Sitton and Deputy Trial Counsel R. Kevin Bucher. Respondent represented herself in this matter. Prior to the commencement of trial, the parties entered an oral stipulation as to facts, which was made part of the court record. The trial then took place as scheduled.

At the conclusion of the trial on November 27, 2012, the court took the matter under submission for decision

Findings of Fact and Conclusions of Law

Respondent was admitted to the practice of law in California on December 10, 1982, and has been a member of the State Bar of California at all times since that date.

With respect to the credibility of the witnesses who testified at trial in the instant matter, the court has carefully weighed and considered their demeanor while testifying, the manner in which they testified, their personal interest or lack thereof in the outcome of this proceeding, and their capacity to accurately perceive, recollect, and communicate the matters on which they testified. (See, Evid. Code § 780 [list of factors to consider in determining credibility].) Using the afore-listed criteria, the court finds that the trial testimony of each witness in this proceeding to be credible.

---

[2] On November 8, 2012, respondent filed an amended answer to the NDC. On November 9, 2012, the State Bar filed an opposition and motion to strike respondent's amended answer. On November 27, 2012, the court granted the State Bar's motion to strike the amended answer.

Case No. 11-O-19391

Facts

On September 28, 2010, the Riverside County Department of Public Social Services (DPSS) filed a juvenile dependency case, *In re Hayden M. H.*, case No. SWJ 001172, in the Riverside County Superior Court.

On September 29, 2010, Elizabeth Wingate (Wingate) was appointed by the dependency court to represent the minor's mother (Mother) in *In re Hayden M. H.* Wingate was a member of the Juvenile Defense Panel (JDP), an entity that contracted with the County of Riverside to provide appointed counsel to parents and the minor children, who were parties in dependency proceedings.

On November 1, 2010, attorney Margie Brakhage (Brakhage) substituted into the case after Wingate was terminated as Mother's attorney because of Mother's dissatisfaction with Wingate's representation. Among other things, Mother was dissatisfied that Wingate had failed to address with the court the issue of Mother's use of medical marijuana and Mother's contention that her use of medical marijuana should not be taken into consideration by the court in determining whether she should be granted continuing reunification services in the dependency matter.

Thereafter, in or about April 2011, Mother contacted respondent about contesting dependency court Judge Michael Rushton's position in the dependency proceeding, regarding Mother's use of medical marijuana. Respondent was the director of Legal and Legislative Analysis for Crusaders for Patients Rights (CPR), a non-profit organization that assists California residents who use medical marijuana as allowed under California law.

On June 2, 2011, Brakhage filed a motion to be relieved as counsel of record for Mother. Brakhage's motion was later granted.

On June 28, 2011, respondent filed a motion to disqualify Judge Rushton based on his alleged statements concerning medical marijuana and the resulting prejudice that his alleged views would bring to bear on Mother's right to use medical marijuana, while attempting to reunify with her child.

On July 22, 2011, Judge Rushton re-appointed Wingate to represent Mother over respondent's objections. Before appointing Wingate, Judge Rushton asked respondent to represent Mother in the juvenile dependency action. Respondent declined.

On August 18, 2011, Wingate filed a "*Marsden*" motion on behalf of Mother. The court set the hearing on the motion for August 29, 2011.

On August 23, 2011, respondent filed a Notice of Limited Scope Representation, stating that respondent would be representing Mother for the purposes set forth in the limited scope representation agreement and for the August 29, 2011 *Marsden* hearing. However, the dependency court recognized the scope of respondent's representation of Mother to include only the August 29, 2011 *Marsden* hearing and no other issues.

On August 25, 2011, respondent filed a legal malpractice action on behalf of Mother against Wingate.

On August 29, 2011, when the *Marsden* hearing in *In re Hayden M. H.* was called by the dependency court, Wingate declared a conflict of interest due to the pending legal malpractice action filed by respondent on behalf of Mother. The court recognized the conflict and relieved Wingate as counsel for Mother. Judge Rushton then took the *Marsden* hearing off-calendar and ordered respondent to leave the courtroom, finding, on the record, that respondent had no connection to the dependency proceeding, which was a closed juvenile proceeding, and had no lawful standing to remain in the courtroom.

Respondent then informed the court that she intended to stay for the remainder of the proceeding, since her limited scope of representation agreement with Mother, which had been filed with the clerk of the court, provided for her representing Mother on issues that extended beyond those raised in the *Marsden* hearing. The court informed respondent that it did not recognize the limited scope agreement and did not recognize respondent as Mother's attorney for any issue other than the *Marsden* hearing. Judge Rushton reminded respondent that the dependency proceeding was a closed proceeding and ordered her to leave the courtroom.

Respondent continued to argue the issue of limited scope representation, as well as other subjects. The court ordered respondent to leave the courtroom a third and fourth time.

The court then informed respondent that if she believed the court's rulings to be incorrect, the proper remedy was not to disobey the order of the court, but, to seek review. The court further informed respondent that if she continued to disobey the order to leave the courtroom, the court would find her in contempt. Respondent indicated that she would leave. She then gathered her belongings and slowly left the courtroom, while continuing to argue with the court.

After respondent left the courtroom, the court resumed the confidential proceeding. The court was attempting to have new counsel appointed for Mother and asked another attorney, who was the head of the JDP, for assistance.

At trial in the instant matter, respondent testified that her limited scope representation agreement with Mother entitled her to remain in the courtroom after the court instructed her to leave. Respondent maintained that it had been her belief that after Wingate declared a conflict in the August 29, 2011 dependency proceeding, the court did not relieve Wingate as Mother's counsel of record. Respondent also contended that it was her belief that the court was going to

proceed with a second hearing/trial in *In re Hayden M. H* on August 29, 2011,[3] without Mother having the benefit of being represented by counsel. The purpose of the second hearing would have been to determine how and if Mother had a right to use medical marijuana. Additionally, respondent was concerned that Mother's rights would be at risk if the trial took place and she was deprived of the benefit of representation by counsel for such trial. Therefore, when the court ordered respondent to leave the courtroom she left slowly, while speaking, so that she could make a record of her contentions in order to protect Mother's legal position in the dependency matter.

But, some five to ten minutes after respondent left the courtroom and the court resumed the confidential proceeding, respondent re-entered the courtroom without permission to do so. She proceeded to walk up to and around counsel table before being stopped by a courtroom deputy. As respondent re-entered she interrupted the court, addressing the court about the *Marsden* hearing. A then unidentified audience member in the courtroom addressed the court, calling out support for respondent to be allowed in the courtroom. As a result, the court halted the proceeding, ordered that the courtroom be cleared and respondent to remain. The court stated that it would be holding a contempt hearing "forthwith."

Respondent has admitted that she re-entered the courtroom because she feared that Mother's legal rights were being ignored by the court.

Whatever respondent may have believed, she had been clearly ordered to leave the courtroom when the *Marsden* hearing was taken off calendar. The transcript (Exh. 7) of the

---

[3] Respondent's belief that the a second hearing was scheduled, was not unreasonable in that Deputy County Counsel Kristine Bell-Valdez, who called the case in *In re Hayden M. H.*, announced, in pertinent part, "We're here on two matters. First, is a further proceedings [sic] regarding Mother's use of marijuana." (Exh. 4., page 000027.) However, while respondent may have reasonably believed that a hearing regarding Mother's use of marijuana was set to go forth, that belief did not entitle her to disobey a court order. (See, "Count One," *post.*)

dependency proceeding establishes that Wingate declared that she had a conflict with Mother and that court granted Wingate's request to be relieved as counsel based on that declared conflict. The record also establishes that the court ordered that the *Marsden* hearing be taken off calendar after relieving Wingate as Mother's counsel.

The court held the contempt hearing on August 29, 2011. After stating the court's version of the facts and events that had transpired, Judge Rushton gave respondent an opportunity to explain, provide an excuse, or apologize to the court. When the hearing concluded, the court found that: (1) respondent engaged in contemptuous, insolent and disruptive behavior toward the court by returning to the courtroom after she had been ordered to leave; (2) respondent's behavior was a breach of the peace; and (3) the court's order sending respondent out of the courtroom was a lawful order of the court. The court then found respondent guilty of contempt and ordered that she pay a $1,000 sanction. The court's written order, which was filed on August 31, 2011, required that the $1,000 sanction was to be paid by September 8, 2011. (Exh. 4, page 000006.)

On September 18, 2011, respondent filed a Petition for Writ of Certiorari in the Court of Appeal seeking review of the contempt order. The appeal was denied without an opinion being issued.

Respondent testified and produced evidence that on August 29, 2011, she prepared a letter addressed to "Shanee Michaelson" at the State Bar, which stated that she had been sanctioned by the court in the amount of $1,000. (See, Exh. A.)

The State Bar, however, has no record that it received written notification from respondent informing it that on August 29, 2011, the dependency court had found her in contempt of court and imposed sanctions in the amount of $1,000.

Respondent stated that she had been so distraught by the August 29, 2011 proceedings in the dependency court that she has no current recollection of writing a letter that day or printing and mailing a letter to the State Bar. However, she found a letter, which was dated August 29, 2011 and was addressed, to the State Bar, in her computer. The electronic data in respondent's computer files shows that the letter was drafted on August 29, 2011, and printed out early on the morning of August 30, 2011.

Respondent testified that given that her computer shows that she wrote and printed the letter, she believes that she mailed it to the State Bar, since in the ordinary course of her practice she always has envelopes and mailing stamps on hand for her mailings. And while she has no independent memory of mailing the letter, she does remember that on August 29, 2011, she knew she needed to report the $1,000 sanction to the State Bar and that she intended to do so that day. Given that respondent intended to mail a letter to the State Bar on August 29, 2011, that she wrote such a letter on August 29, 2011, that the letter was printed early in the morning on August 30, 2011; and, given that she had the paraphernalia, i.e., envelopes and stamps available to mail the letter and that it is respondent's ordinary business practice to mail letters that she intends to send, respondent concludes that she sent the August 29, 2011 letter to the State Bar.

But, as set forth, *ante*, the State Bar has no record of receiving the letter from respondent.

Conclusions

Count One - (§ 6103 [Failure to Obey a Court Order])

Section 6103 provides, in pertinent part, that a willful disobedience or violation of a court order requiring an attorney to do or forbear an act connected with or in the course of the attorney's profession, which an attorney ought in good faith to do or forbear, constitutes cause for suspension or disbarment.

The evidence shows that respondent, who was present in the courtroom for the August 29, 2011 hearing in the *In re Hayden M. H.* proceeding, was ordered by the court to leave the courtroom four times. After taking the *Marsden* hearing off calendar, the court informed respondent that she had no standing to be in the courtroom during the *In re Hayden M. H.* proceeding, which was a closed proceeding, and ordered her out of the courtroom. After being warned by Judge Rushton that the court would hold her in contempt if she did not leave the courtroom, respondent gathered her belonging and left. However, within 10 minutes of having been ordered out of the courtroom, respondent re-entered the courtroom.

Respondent knew or should have known that she had been ordered out of the courtroom and that pursuant to the court's order she was not allowed to re-enter the courtroom. By re-entering the courtroom, respondent disobeyed the court's order.

When an attorney disobeys a court order based on an untested belief public discipline is necessary to make clear to the bar, the courts, and the public that the attorney faces serious consequences for such misconduct. (*In the Matter of Klein* (Review Dept. 1994) 3 Cal. State Bar Ct. Rptr. 1, 14.) There can be no plausible belief in the right to ignore orders one personally considers invalid. Respondent had been correctly advised by the court that under such circumstances, her remedy was to seek review – not ignore a court order.

Thus, the court finds by clear and convincing evidence that respondent willfully violated a court order requiring her to do an act in the course of her profession, which she ought to have done in good faith, and, thereby, willfully violated section 6103.

Count Two - (§ 6068, subd. (o)(3) [Failure to Report Sanctions])

Section 6068, subdivision (o)(3), requires an attorney to report to the State Bar the imposition of judicial sanctions, in writing, within 30 days of the time the attorney has

knowledge of the imposition of any judicial sanctions against the attorney, except for sanctions for failure to make discovery or monetary sanctions of less than $1,000.

In Count Two the State Bar charges that respondent violated section 6068, subdivision (o)(3) by not reporting to the State Bar the $1,000 sanction that the dependency court issued against her. The record, however, fails to establish by clear and convincing evidence that respondent did not provide written notice to the State Bar of the August 29, 2011 imposition of sanctions.

"The State Bar must establish a charge of unprofessional conduct by convincing proof and to a reasonable certainty. [Citation.] All reasonable doubts are resolved in favor of the attorney. [Citations.]" (*Ballard v. State Bar* (1983) 35 Cal.3d 274, 291.)

Here, the record has failed to establish by convincing proof and to a reasonable certainty that respondent failed to provide the State Bar with a written documenting the imposition of judicial sanctions against her. At trial the State Bar offered no evidence to support its assertion that respondent had failed to submit to the State Bar a written report regarding the $1,000 sanction that had been imposed against her. The State Bar simply asserted that it has no record of receiving a letter from respondent notifying it of the August 29, 2011 imposition of sanctions.

Moreover, respondent testified that she located a copy of a letter in her computer, which was addressed to the State Bar and that the letter set forth the circumstances and details of the imposition of sanctions against her. Respondent provided evidence of that letter in this proceeding (Exh. A.) She also stated that while she has no independent recollection of drafting, printing or sending the letter regarding the sanctions to the State Bar, she does remember that on August 29, 2011, the date on which the contempt hearing occurred, it was her intention to send such a letter. Respondent also asserted that it would have been consistent with her normal

business practice to send the letter if she had drafted it and printed it out – which the data in her computer shows that she did.

Thus, absent any evidence that respondent failed to report in writing to the State Bar that she had been sanctioned $1,000 by the dependency court, and resolving all reasonable doubts in favor of respondent, the court finds that the State Bar has not met its burden of establishing by clear and convincing evidence that respondent violated section 6103, subdivision (o)(3). Accordingly Count Two is dismissed with prejudice.

Aggravation[4]

Harm to Client/Public/Administration of Justice (Std. 1.2(b)(iv).)

As harm to the administration of justice is inherent in the failure to obey a court order, it would be duplicative to find such harm as an aggravating circumstance.

Indifference Toward Rectification/Atonement (Std. 1.2(b)(v).)

Respondent failed to understand that as a member of the bar she is required to obey a court order.

Mitigation

No Prior Record (Std. 1.2(e)(i).)

Respondent was admitted to the practice of law in December 1982 and has no prior record of discipline. Respondent's 28+ years of discipline-free practice at the time of her misconduct in 2011, is a compelling mitigating factor. (Standard 1.2(e)(i).) "Absence of a prior disciplinary record is an important mitigating circumstance when an attorney has practiced for a significant period of time." (*In re Young* (1989) 49 Cal.3d 257, 269.)

[4] All references to standards (Std.) are to the Rules of Procedure of the State Bar, title IV, Standards for Attorney Sanctions for Professional Misconduct.

Candor/Cooperation to Victims/State Bar (Std. 1.2(e)(v).)

Respondent entered a Stipulation as to Admission of Documents and an oral stipulation as to facts. Respondent stipulated to almost all the facts alleged in the NDC. The facts were extensive, relevant, and assisted the prosecution of the case. Thus, the court finds that respondent's stipulation as to admission of documents and the stipulation as to facts constitute a mitigating circumstance. (*In the Matter of Kaplan* (Review Dept. 1996) 3 Cal. State Bar Ct. Rptr. 547, 567.)

Pro Bono Activity (Std. 1.2(e)(vi).)

Respondent credibly testified regarding her pro bono work. She has represented many clients on a pro bono basis, including the mother of the minor in *In re Hayden M. H.* Additionally, respondent represented a student in a school administrative suspension matter on a pro bono basis. Respondent investigated the matter and appeared at an administrative hearing for the student. Due to her efforts, the student's suspension was lifted. Therefore, the court finds it appropriate to afford moderate weight to this mitigation evidence.

Discussion

The purpose of State Bar disciplinary proceedings is not to punish the attorney, but to protect the public, to preserve public confidence in the profession, and to maintain the highest possible professional standards for attorneys. (*Chadwick v. State Bar* (1989) 49 Cal.3d 103, 111; *Cooper v. State Bar* (1987) 43 Cal.3d 1016, 1025; std. 1.3.)

Standard 1.6(b) provides, in pertinent part, that the specific sanction for the particular violation found must be balanced with any mitigating or aggravating circumstances, with due regard for the purposes of imposing disciplinary sanctions.

Standard 2.6 provides that violation of certain provisions of the Business and Professions Code, including section 6103, must result in disbarment or suspension depending on the gravity of the offense or the harm to the victim, with due regard for the purposes of discipline.

It is well-settled that the degree of discipline is not derived from a fixed formula. (*Sugarman v. State Bar* (1990) 51 Cal.3d 609, 618.) The standards "do not mandate a specific discipline." (*In the Matter of Van Sickle* (Review Dept. 2006) 4 Cal. State Bar Ct. Rptr. 980, 994.) It has been long-held that the court "is not bound to follow the standards in talismanic fashion." (*Howard v. State Bar* (1990) 51 Cal.3d 215, 221-222.) While the standards are entitled to great weight (*In re Silverton* (2005) 36 Cal.4th 81, 92), they do not provide for mandatory disciplinary outcomes. Because the standards do not mandate a particular result, the court looks to relevant case law for guidance as to the appropriate discipline.

In the instant matter, the court finds the following cases instructive.

In *In the Matter of Respondent Y* (Review Dept. 1998) 3 Cal. State Bar Ct. Rptr. 862, the attorney violated section 6068, subdivision (o)(3) by failing to timely report to the State Bar the imposition of $1,000 in court ordered sanctions against him for bad faith tactics and actions. The attorney also violated section 6103 by failing to pay the sanctions as ordered. The only mitigating circumstance in *Respondent Y* was that the attorney had no prior record of discipline. The review department imposed a private reproval on the attorney with conditions, which required that he pay the sanctions with interest within 15 days, attend and successfully complete the State Bar's Ethics School within one year, and take and pass the Multistate Professional Responsibility Examination within one year.

In *In the Matter of Respondent X* (Review Dept. 1997) 3 Cal. State Bar Ct. Rptr. 592, an attorney who was found culpable of violating a court's confidentiality order regarding a settlement agreement was privately reproved without any conditions attached to the reproval .

No aggravation was found. However, the attorney was accorded significant mitigation because he had no prior record of discipline in his 18 years of practice.

In this matter, respondent's misconduct and the circumstances surrounding that misconduct are more serious than that of the attorneys in *Respondent Y* and *Respondent X*. While respondent's dedication to her client and the protection of the rights of her client is commendable, she fails to understand that it is unacceptable for a member of the bar to disobey a court order based on said member's subjective belief. Nonetheless there is significantly greater mitigation in this proceeding than in *Respondent Y* and *Respondent X*

The court concludes that it would be manifestly unjust under the circumstances to recommend an actual suspension in this matter. (See *In the Matter of Buckley* (Review Dept. 1990) 1 Cal. State Bar Ct. Rptr. 201 [the court determined that a public reproval was warranted, but not suspension for an attorney who had two prior private reprovals for one client abandonment and contempt of court].)

In light of the presence of compelling mitigation, including respondent's 28+ years of practice without prior discipline, cooperation with the State Bar and the court by entering an extensive stipulation as to facts and a stipulation as to the admission of documents, and respondent's dedication to her pro bono clients, any period of suspension would not further the objectives of attorney discipline and would be punitive in nature. Accordingly, the court concludes that a public reproval with attached conditions is an appropriate disposition in of this matter.

Disposition

It is ordered that respondent Letitia Elisabeth Pepper, State Bar Number 105277, is publicly reproved. Pursuant to the provisions of rule 5.127(A) of the Rules of Procedure of the State Bar, the public reproval will be effective when this decision becomes final. Furthermore,

pursuant to rule 9.19(a) of the California Rules of Court and rule 5.128 of the Rules of Procedure, the court finds that the interest of respondent and the protection of the public will be served by the following specified conditions being attached to the public reproval imposed in this matter. Failure to comply with any condition(s) attached to the public reproval may constitute cause for a separate proceeding for willful breach of rule 1-110 of the State Bar Rules of Professional Conduct. Respondent is ordered to comply with the following conditions attached to her public reproval for one year following the effective date of the public reproval.

Reproval Conditions

1. Respondent must comply with the provisions of the State Bar Act, the Rules of Professional Conduct, and all of the conditions of respondent's reproval.

2. Within 30 days after the effective date of discipline, respondent must contact the Office of Probation and schedule a meeting with respondent's assigned probation deputy to discuss the terms and conditions of the reproval. Upon the direction of the Office of Probation, respondent must meet with the probation deputy either in person or by telephone. During the reproval period, respondent must promptly meet with the probation deputy as directed and upon request.

3. During the reproval period, respondent must report in writing quarterly to the Office of Probation. The reports must be postmarked no later than each January 10, April 10, July 10, and October 10 of the reproval period. Under penalty of perjury, respondent must state in each report whether respondent has complied with the State Bar Act, the Rules of Professional Conduct, and all of respondent's reproval conditions during the preceding calendar quarter or applicable reporting period. If the first report would cover less than 30 days, no report is required at that time; however, the following report must cover the period of time from the commencement of the reproval period to the end of that next quarter. In addition to all quarterly reports, respondent must submit a final report containing the same foregoing information during the last 20 days of the one-year reproval period.

4. Subject to the assertion of applicable privileges, respondent must answer fully, promptly, and truthfully, any inquiries of the Office of Probation that are directed to respondent personally or in writing, relating to whether respondent is complying or has complied with respondent's reproval conditions.

5. Within one year after the effective date of the discipline herein, respondent must submit to the Office of Probation in Los Angeles satisfactory evidence of completion of the State Bar's Ethics School and passage of the test given at the end of that session. The program is offered periodically both at 180 Howard Street, San Francisco, California 94105-1639 and at 1149 South Hill Street, Los Angeles, California 90015-2299. Arrangements to attend the program must be made in advance by calling (213) 765-1287 and by paying the required fee. This requirement is separate from any Minimum Continuing Legal Education (MCLE) requirement, and respondent

will not receive and is ordered not to claim any MCLE credit for attending Ethics School. (Rules Proc. of State Bar, rule 3201.)

6. Respondent must take and pass the Multistate Professional Responsibility Examination within one year after the effective date of this order and provide satisfactory proof of such passage to the State Bar's Office of Probation in Los Angeles within the same period.

Costs

Costs are awarded to the State Bar in accordance with Business and Professions Code section 6086.10, and are enforceable both as provided in Business and Professions Code section 6140.7 and as a money judgment.

Dated: February 20, 2013

RICHARD A. PLATEL
Judge of the State Bar Court

CERTIFICATE OF SERVICE

[Rules Proc. of State Bar; Rule 5.27(B); Code Civ. Proc., § 1013a(4)]

I am a Case Administrator of the State Bar Court of California. I am over the age of eighteen and not a party to the within proceeding. Pursuant to standard court practice, in the City and County of Los Angeles, on February 22, 2013, I deposited a true copy of the following document(s):
DECISION

in a sealed envelope for collection and mailing on that date as follows:

☒ by first-class mail, with postage thereon fully prepaid, through the United States Postal Service at Los Angeles, California, addressed as follows:

LETITIA ELISABETH PEPPER
PO BOX 55560
RIVERSIDE, CA 92517

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

Rizamari C. Sitton, Enforcement, Los Angeles

I hereby certify that the foregoing is true and correct. Executed in Los Angeles, California, on February 22, 2013.

Johnnie Lee Smith
Case Administrator
State Bar Court