



(Do not write above this line.)

State Bar Court of California Hearing Department San Francisco ACTUAL SUSPENSION		
Counsel for the State Bar Jennifer Roque Deputy Trial Counsel 180 Howard Street San Francisco, CA 94105 (415) 538-2452 Bar # 282441	Case Number(s): 14-O-04027-YDR; 16-O-12317	For Court use only <div style="text-align: center;"> PUBLIC MATTER FILED JAN 30 2019 <i>WR</i> </div> STATE BAR COURT CLERK'S OFFICE SAN FRANCISCO
Counsel For Respondent Jonathan I. Arons, Esq. 100 Bush St Ste 918 San Francisco CA 94104 (415) 957-1818 Bar # 111257	Submitted to: Settlement Judge STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND ORDER APPROVING ACTUAL SUSPENSION <input type="checkbox"/> PREVIOUS STIPULATION REJECTED	
In the Matter of: STEPHEN GARY QUADE Bar # 156961 A Member of the State Bar of California (Respondent)		

Note: All information required by this form and any additional information which cannot be provided in the space provided, must be set forth in an attachment to this stipulation under specific headings, e.g., "Facts," "Dismissals," "Conclusions of Law," "Supporting Authority," etc.

A. Parties' Acknowledgments:

- (1) Respondent is a member of the State Bar of California, admitted **December 20, 1991**.
- (2) The parties agree to be bound by the factual stipulations contained herein even if conclusions of law or disposition are rejected or changed by the Supreme Court.
- (3) All investigations or proceedings listed by case number in the caption of this stipulation are entirely resolved by this stipulation and are deemed consolidated. Dismissed charge(s)/count(s) are listed under "Dismissals." The stipulation consists of **19** pages, not including the order.
- (4) A statement of acts or omissions acknowledged by Respondent as cause or causes for discipline is included under "Facts."
- (5) Conclusions of law, drawn from and specifically referring to the facts are also included under "Conclusions of Law."

- (6) The parties must include supporting authority for the recommended level of discipline under the heading "Supporting Authority."
- (7) No more than 30 days prior to the filing of this stipulation, Respondent has been advised in writing of any pending investigation/proceeding not resolved by this stipulation, except for criminal investigations.
- (8) Payment of Disciplinary Costs—Respondent acknowledges the provisions of Bus. & Prof. Code §§6086.10 & 6140.7. It is recommended that (check one option only):
- Costs be 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. Unless the time for payment of discipline costs is extended pursuant to subdivision (c) of section 6086.10, costs assessed against a member who is actually suspended or disbarred must be paid as a condition of reinstatement or return to active status.
 - Costs be 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. **SELECT ONE** of the costs must be paid with Respondent's membership fees for each of the following years:

If Respondent fails to pay any installment as described above, or as may be modified in writing by the State Bar or the State Bar Court, the remaining balance will be due and payable immediately.
 - Costs are waived in part as set forth in a separate attachment entitled "Partial Waiver of Costs."
 - Costs are entirely waived.

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

- (1) **Prior record of discipline:**
- (a) State Bar Court case # of prior case:
 - (b) Date prior discipline effective:
 - (c) Rules of Professional Conduct/ State Bar Act violations:
 - (d) Degree of prior discipline:
 - (e) If Respondent has two or more incidents of prior discipline, use space provided below.
- (2) **Intentional/Bad Faith/Dishonesty:** Respondent's misconduct was dishonest, intentional, or surrounded by, or followed by bad faith.
- (3) **Misrepresentation:** Respondent's misconduct was surrounded by, or followed by, misrepresentation.
- (4) **Concealment:** Respondent's misconduct was surrounded by, or followed by, concealment.
- (5) **Overreaching:** Respondent's misconduct was surrounded by, or followed by, overreaching.

(Do not write above this line.)

- (6) **Uncharged Violations:** Respondent's conduct involves uncharged violations of the Business and Professions Code, or the Rules of Professional Conduct.
- (7) **Trust Violation:** Trust funds or property were involved and Respondent refused or was unable to account to the client or person who was the object of the misconduct for improper conduct toward said funds or property.
- (8) **Harm:** Respondent's misconduct harmed significantly a client, the public, or the administration of justice. **See page 16**
- (9) **Indifference:** Respondent demonstrated indifference toward rectification of or atonement for the consequences of Respondent's misconduct.
- (10) **Candor/Lack of Cooperation:** Respondent displayed a lack of candor and cooperation to victims of Respondent's misconduct, or to the State Bar during disciplinary investigations or proceedings.
- (11) **Multiple Acts:** Respondent's current misconduct evidences multiple acts of wrongdoing. **See page 16**
- (12) **Pattern:** Respondent's current misconduct demonstrates a pattern of misconduct.
- (13) **Restitution:** Respondent failed to make restitution. **See page 16**
- (14) **Vulnerable Victim:** The victim(s) of Respondent's misconduct was/were highly vulnerable. **See page 16**
- (15) **No aggravating circumstances** are involved.

Additional aggravating circumstances:

C. Mitigating Circumstances [Standards 1.2(i) & 1.6]. Facts supporting mitigating circumstances are required.

- (1) **No Prior Discipline:** Respondent has no prior record of discipline over many years of practice coupled with present misconduct which is not likely to recur.
- (2) **No Harm:** Respondent did not harm the client, the public, or the administration of justice.
- (3) **Candor/Cooperation:** Respondent displayed spontaneous candor and cooperation with the victims of Respondent's misconduct or to the State Bar during disciplinary investigations and proceedings.
- (4) **Remorse:** Respondent promptly took objective steps demonstrating spontaneous remorse and recognition of the wrongdoing, which steps were designed to timely atone for any consequences of Respondent's misconduct.
- (5) **Restitution:** Respondent paid \$ _____ on _____ in restitution to _____ without the threat or force of disciplinary, civil or criminal proceedings.
- (6) **Delay:** These disciplinary proceedings were excessively delayed. The delay is not attributable to Respondent and the delay prejudiced Respondent.
- (7) **Good Faith:** Respondent acted with a good faith belief that was honestly held and objectively reasonable.

(Do not write above this line.)

- (8) **Emotional/Physical Difficulties:** At the time of the stipulated act or acts of professional misconduct, Respondent suffered extreme emotional difficulties or physical or mental disabilities which expert testimony would establish was directly responsible for the misconduct. The difficulties or disabilities were not the product of any illegal conduct by Respondent, such as illegal drug or substance abuse, and the difficulties or disabilities no longer pose a risk that Respondent will commit misconduct. **See page 16**
- (9) **Severe Financial Stress:** At the time of the misconduct, Respondent suffered from severe financial stress which resulted from circumstances not reasonably foreseeable or which were beyond Respondent's control and which were directly responsible for the misconduct.
- (10) **Family Problems:** At the time of the misconduct, Respondent suffered extreme difficulties in Respondent's personal life which were other than emotional or physical in nature.
- (11) **Good Character:** Respondent's extraordinarily good character is attested to by a wide range of references in the legal and general communities who are aware of the full extent of Respondent's misconduct.
- (12) **Rehabilitation:** Considerable time has passed since the acts of professional misconduct occurred followed by convincing proof of subsequent rehabilitation.
- (13) **No mitigating circumstances** are involved.

Additional mitigating circumstances:

Pretrial Stipulation. See page 16.
No Prior Discipline. See page 16.

D. Recommended Discipline:

(1) **Actual Suspension:**

Respondent is suspended from the practice of law for _____, the execution of that suspension is stayed, and Respondent is placed on probation for _____ with the following conditions.

- Respondent must be suspended from the practice of law for the first _____ of the period of Respondent's probation.

(2) **Actual Suspension "And Until" Rehabilitation:**

Respondent is suspended from the practice of law for _____, the execution of that suspension is stayed, and Respondent is placed on probation for _____ with the following conditions.

- Respondent must be suspended from the practice of law for a minimum of the first _____ of Respondent's probation and until Respondent provides proof to the State Bar Court of Respondent's rehabilitation, fitness to practice, and present learning and ability in the general law. (Rules Proc. of State Bar, tit. IV, Stds. for Atty. Sanctions for Prof. Misconduct, std. 1.2(c)(1).)

(3) **Actual Suspension "And Until" Restitution (Single Payee) and Rehabilitation:**

Respondent is suspended from the practice of law for _____, the execution of that suspension is stayed, and Respondent is placed on probation for _____ with the following conditions.

- Respondent must be suspended from the practice of law for a minimum of the first _____ of Respondent's probation, and Respondent will remain suspended until both of the following requirements are satisfied:

(Do not write above this line.)

- a. Respondent makes restitution to _____ in the amount of \$ _____ plus 10 percent interest per year from _____ (or reimburses the Client Security Fund to the extent of any payment from the Fund to such payee, in accordance with Business and Professions Code section 6140.5) and furnishes satisfactory proof to the State Bar's Office of Probation in Los Angeles; and
- b. Respondent provides proof to the State Bar Court of Respondent's rehabilitation, fitness to practice, and present learning and ability in the general law. (Rules Proc. of State Bar, tit. IV, Stds. for Atty. Sanctions for Prof. Misconduct, std. 1.2(c)(1).)

(4) **Actual Suspension "And Until" Restitution (Multiple Payees) and Rehabilitation:**

Respondent is suspended from the practice of law for _____, the execution of that suspension is stayed, and Respondent is placed on probation for _____ with the following conditions.

- Respondent must be suspended from the practice of law for a minimum of the first year of Respondent's probation, and Respondent will remain suspended until both of the following requirements are satisfied:
 - a. Respondent must make restitution, including the principal amount plus 10 percent interest per year (and furnish satisfactory proof of such restitution to the Office of Probation), to each of the following payees (or reimburse the Client Security Fund to the extent of any payment from the Fund to such payee in accordance with Business and Professions Code section 6140.5):

<i>Payee</i>	<i>Principal Amount</i>	<i>Interest Accrues From</i>

- b. Respondent provides proof to the State Bar Court of Respondent's rehabilitation, fitness to practice, and present learning and ability in the general law. (Rules Proc. of State Bar, tit. IV, Stds. for Atty. Sanctions for Prof. Misconduct, std. 1.2(c)(1).)

(5) **Actual Suspension "And Until" Restitution (Single Payee) with Conditional Std. 1.2(c)(1) Requirement:**

Respondent is suspended from the practice of law for _____, the execution of that suspension is stayed, and Respondent is placed on probation for _____ with the following conditions.

- Respondent must be suspended from the practice of law for a minimum for the first _____ of Respondent's probation, and Respondent will remain suspended until the following requirements are satisfied:
 - a. Respondent makes restitution to _____ in the amount of \$ _____ plus 10 percent interest per year from _____ (or reimburses the Client Security Fund to the extent of any payment from the Fund to such payee, in accordance with Business and Professions Code section 6140.5) and furnishes satisfactory proof to the State Bar's Office of Probation in Los Angeles; and,
 - b. If Respondent remains suspended for two years or longer, Respondent must provide proof to the State Bar Court of Respondent's rehabilitation, fitness to practice, and present learning and ability

(Do not write above this line.)

in the general law. (Rules Proc. of State Bar, tit. IV, Stds. for Atty. Sanctions for Prof. Misconduct, std. 1.2(c)(1).)

(6) **Actual Suspension "And Until" Restitution (Multiple Payees) with Conditional Std. 1.2(c)(1) Requirement:**

Respondent is suspended from the practice of law for **two (2) years**, the execution of that suspension is stayed, and Respondent is placed on probation for **two (2) years** with the following conditions.

- Respondent must be suspended from the practice of law for a minimum for the first **year** of Respondent's probation, and Respondent will remain suspended until the following requirements are satisfied:
 - a. Respondent must make restitution, including the principal amount plus 10 percent interest per year (and furnish satisfactory proof of such restitution to the Office of Probation), to each of the following payees (or reimburse the Client Security Fund to the extent of any payment from the Fund to such payee in accordance with Business and Professions Code section 6140.5):

<i>Payee</i>	<i>Principal Amount</i>	<i>Interest Accrues From</i>
Adriana Poblete (14-O-04027)	\$16,850	August 21, 2010
Silbestre Espinosa (16-O-12317)	\$25,000	April 16, 2008

- b. If Respondent remains suspended for two years or longer, Respondent must provide proof to the State Bar Court of Respondent's rehabilitation, fitness to practice, and present learning and ability in the general law. (Rules Proc. of State Bar, tit. IV, Stds. for Atty. Sanctions for Prof. Misconduct, std. 1.2(c)(1).)

(7) **Actual Suspension with Credit for Interim Suspension:**

Respondent is suspended from the practice of law for _____, the execution of that suspension is stayed, and Respondent is placed on probation for _____ with the following conditions.

- Respondent is suspended from the practice of law for the first _____ of probation (with credit given for the period of interim suspension which commenced on _____).

E. Additional Conditions of Probation:

- (1) **Review Rules of Professional Conduct:** Within 30 days after the effective date of the Supreme Court order imposing discipline in this matter, Respondent must (1) read the California Rules of Professional Conduct (Rules of Professional Conduct) and Business and Professions Code sections 6067, 6068, and 6103 through 6126, and (2) provide a declaration, under penalty of perjury, attesting to Respondent's compliance with this requirement, to the State Bar's Office of Probation in Los Angeles (Office of Probation) with Respondent's first quarterly report.

- (2) **Comply with State Bar Act, Rules of Professional Conduct, and Probation Conditions:** Respondent must comply with the provisions of the State Bar Act, the Rules of Professional Conduct, and all conditions of Respondent's probation.
- (3) **Maintain Valid Official Membership Address and Other Required Contact Information:** Within 30 days after the effective date of the Supreme Court order imposing discipline in this matter, Respondent must make certain that the State Bar Attorney Regulation and Consumer Resources Office (ARCR) has Respondent's current office address, email address, and telephone number. If Respondent does not maintain an office, Respondent must provide the mailing address, email address, and telephone number to be used for State Bar purposes. Respondent must report, in writing, any change in the above information to ARCR, within ten (10) days after such change, in the manner required by that office.
- (4) **Meet and Cooperate with Office of Probation:** Within 15 days after the effective date of the Supreme Court order imposing discipline in this matter, Respondent must schedule a meeting with Respondent's assigned probation case specialist to discuss the terms and conditions of Respondent's discipline and, within 30 days after the effective date of the court's order, must participate in such meeting. Unless otherwise instructed by the Office of Probation, Respondent may meet with the probation case specialist in person or by telephone. During the probation period, Respondent must promptly meet with representatives of the Office of Probation as requested by it and, subject to the assertion of applicable privileges, must fully, promptly, and truthfully answer any inquiries by it and provide to it any other information requested by it.
- (5) **State Bar Court Retains Jurisdiction/Appear Before and Cooperate with State Bar Court:** During Respondent's probation period, the State Bar Court retains jurisdiction over Respondent to address issues concerning compliance with probation conditions. During this period, Respondent must appear before the State Bar Court as required by the court or by the Office of Probation after written notice mailed to Respondent's official membership address, as provided above. Subject to the assertion of applicable privileges, Respondent must fully, promptly, and truthfully answer any inquiries by the court and must provide any other information the court requests.
- (6) **Quarterly and Final Reports:**
- a. Deadlines for Reports.** Respondent must submit written quarterly reports to the Office of Probation no later than each January 10 (covering October 1 through December 31 of the prior year), April 10 (covering January 1 through March 31), July 10 (covering April 1 through June 30), and October 10 (covering July 1 through September 30) within the period of probation. If the first report would cover less than 30 days, that report must be submitted on the next quarter date and cover the extended deadline. In addition to all quarterly reports, Respondent must submit a final report no earlier than ten (10) days before the last day of the probation period and no later than the last day of the probation period.
- b. Contents of Reports.** Respondent must answer, under penalty of perjury, all inquiries contained in the quarterly report form provided by the Office of Probation, including stating whether Respondent has complied with the State Bar Act and the Rules of Professional Conduct during the applicable quarter or period. All reports must be: (1) submitted on the form provided by the Office of Probation; (2) signed and dated after the completion of the period for which the report is being submitted (except for the final report); (3) filled out completely and signed under penalty of perjury; and (4) submitted to the Office of Probation on or before each report's due date.
- c. Submission of Reports.** All reports must be submitted by: (1) fax or email to the Office of Probation; (2) personal delivery to the Office of Probation; (3) certified mail, return receipt requested, to the Office of Probation (postmarked on or before the due date); or (4) other tracked-service provider, such as Federal Express or United Parcel Service, etc. (physically delivered to such provider on or before the due date).
- d. Proof of Compliance.** Respondent is directed to maintain proof of Respondent's compliance with the above requirements for each such report for a minimum of one year after either the period of probation

or the period of Respondent's actual suspension has ended, whichever is longer. Respondent is required to present such proof upon request by the State Bar, the Office of Probation, or the State Bar Court.

- (7) **State Bar Ethics School:** Within one year after the effective date of the Supreme Court order imposing discipline in this matter, Respondent must submit to the Office of Probation satisfactory evidence of completion of the State Bar Ethics School and passage of the test given at the end of that session. This requirement is separate from any Minimum Continuing Legal Education (MCLE) requirement, and Respondent will not receive MCLE credit for attending this session. If Respondent provides satisfactory evidence of completion of the Ethics School after the date of this stipulation but before the effective date of the Supreme Court's order in this matter, Respondent will nonetheless receive credit for such evidence toward Respondent's duty to comply with this condition.
- (8) **State Bar Ethics School Not Recommended:** It is not recommended that Respondent be ordered to attend the State Bar Ethics School because
- (9) **State Bar Client Trust Accounting School:** Within one year after the effective date of the Supreme Court order imposing discipline in this matter, Respondent must submit to the Office of Probation satisfactory evidence of completion of the State Bar Client Trust Accounting School and passage of the test given at the end of that session. This requirement is separate from any Minimum Continuing Legal Education (MCLE) requirement, and Respondent will not receive MCLE credit for attending this session. If Respondent provides satisfactory evidence of completion of the Client Trust Accounting School after the date of this stipulation but before the effective date of the Supreme Court's order in this matter, Respondent will nonetheless receive credit for such evidence toward Respondent's duty to comply with this condition.
- (10) **Minimum Continuing Legal Education (MCLE) Courses – California Legal Ethics [Alternative to State Bar Ethics School for Out-of-State Residents]:** Because Respondent resides outside of California, within _____ after the effective date of the Supreme Court order imposing discipline in this matter, Respondent must either submit to the Office of Probation satisfactory evidence of completion of the State Bar Ethics School and passage of the test given at the end of that session or, in the alternative, complete _____ hours of California Minimum Continuing Legal Education-approved participatory activity in California legal ethics and provide proof of such completion to the Office of Probation. This requirement is separate from any MCLE requirement, and Respondent will not receive MCLE credit for this activity. If Respondent provides satisfactory evidence of completion of the Ethics School or the hours of legal education described above, completed after the date of this stipulation but before the effective date of the Supreme Court's order in this matter, Respondent will nonetheless receive credit for such evidence toward Respondent's duty to comply with this condition.
- (11) **Criminal Probation:** Respondent must comply with all probation conditions imposed in the underlying criminal matter and must report such compliance under penalty of perjury in all quarterly and final reports submitted to the Office of Probation covering any portion of the period of the criminal probation. In each quarterly and final report, if Respondent has an assigned criminal probation officer, Respondent must provide the name and current contact information for that criminal probation officer. If the criminal probation was successfully completed during the period covered by a quarterly or final report, that fact must be reported by Respondent in such report and satisfactory evidence of such fact must be provided with it. If, at any time before or during the period of probation, Respondent's criminal probation is revoked, Respondent is sanctioned by the criminal court, or Respondent's status is otherwise changed due to any alleged violation of the criminal probation conditions by Respondent, Respondent must submit the criminal court records regarding any such action with Respondent's next quarterly or final report.
- (12) **Minimum Continuing Legal Education (MCLE):** Within _____ after the effective date of the Supreme Court order imposing discipline in this matter, Respondent must complete _____ hour(s) of California Minimum Continuing Legal Education-approved participatory activity in SELECT ONE _____ and must provide proof of such completion to the Office of Probation. This requirement is separate from any MCLE requirement, and Respondent will not receive MCLE credit for this activity. If Respondent provides satisfactory evidence of completion of the hours of legal education described above, completed after the

(Do not write above this line.)

date of this stipulation but before the effective date of the Supreme Court's order in this matter, Respondent will nonetheless receive credit for such evidence toward Respondent's duty to comply with this condition.

- (13) **Other:** Respondent must also comply with the following additional conditions of probation:
- (14) **Proof of Compliance with Rule 9.20 Obligations:** Respondent is directed to maintain, for a minimum of one year after commencement of probation, proof of compliance with the Supreme Court's order that Respondent comply with the requirements of California Rules of Court, rule 9.20, subdivisions (a) and (c). Such proof must include: the names and addresses of all individuals and entities to whom Respondent sent notification pursuant to rule 9.20; a copy of each notification letter sent to each recipient; the original receipt or postal authority tracking document for each notification sent; the originals of all returned receipts and notifications of non-delivery; and a copy of the completed compliance affidavit filed by Respondent with the State Bar Court. Respondent is required to present such proof upon request by the State Bar, the Office of Probation, or the State Bar Court.
- (15) **The following conditions are attached hereto and incorporated:**
- Financial Conditions Medical Conditions
- Substance Abuse Conditions

The period of probation will commence on the effective date of the Supreme Court order imposing discipline in this matter. At the expiration of the probation period, if Respondent has complied with all conditions of probation, the period of stayed suspension will be satisfied and that suspension will be terminated.

F. Other Requirements Negotiated by the Parties (Not Probation Conditions):

- (1) **Multistate Professional Responsibility Examination Within One Year or During Period of Actual Suspension:** Respondent must take and pass the Multistate Professional Responsibility Examination administered by the National Conference of Bar Examiners within one year after the effective date of the Supreme Court order imposing discipline in this matter or during the period of Respondent's actual suspension, whichever is longer, and to provide satisfactory proof of such passage to the State Bar's Office of Probation within the same period. Failure to do so may result in suspension. (Cal. Rules of Court, rule 9.10(b).) If Respondent provides satisfactory evidence of the taking and passage of the above examination after the date of this stipulation but before the effective date of the Supreme Court's order in this matter, Respondent will nonetheless receive credit for such evidence toward Respondent's duty to comply with this requirement.
- (2) **Multistate Professional Responsibility Examination Requirement Not Recommended:** It is not recommended that Respondent be ordered to take and pass the Multistate Professional Responsibility Examination because
- (3) **California Rules of Court, Rule 9.20:** Respondent must comply with the requirements of California Rules of Court, rule 9.20, and perform the acts specified in subdivisions (a) and (c) of that rule within 30 and 40 days, respectively, after the effective date of the Supreme Court order imposing discipline in this matter. Failure to do so may result in disbarment or suspension.

For purposes of compliance with rule 9.20(a), the operative date for identification of "clients being represented in pending matters" and others to be notified is the filing date of the Supreme Court order, not any later "effective" date of the order. (*Atheam v. State Bar* (1982) 32 Cal.3d 38, 45.) Further, Respondent is required to file a rule 9.20(c) affidavit even if Respondent has no clients to notify on the date the Supreme Court filed its order in this proceeding. (*Powers v. State Bar* (1988) 44 Cal.3d 337, 341.) In addition to being punished as a crime or contempt, an attorney's failure to comply with rule 9.20

is, inter alia, cause for disbarment, suspension, revocation of any pending disciplinary probation, and denial of an application for reinstatement after disbarment. (Cal. Rules of Court, rule 9.20(d).)

- (4) **California Rules of Court, Rule 9.20 – Conditional Requirement:** If Respondent remains suspended for 90 days or longer, Respondent must comply with the requirements of California Rules of Court, rule 9.20, and perform the acts specified in subdivisions (a) and (c) of that rule within 120 and 130 days, respectively, after the effective date of the Supreme Court order imposing discipline in this matter. Failure to do so may result in disbarment or suspension.

For purposes of compliance with rule 9.20(a), the operative date for identification of “clients being represented in pending matters” and others to be notified is the filing date of the Supreme Court order, not any later “effective” date of the order. (*Athearn v. State Bar* (1982) 32 Cal.3d 38, 45.) Further, Respondent is required to file a rule 9.20(c) affidavit even if Respondent has no clients to notify on the date the Supreme Court filed its order in this proceeding. (*Powers v. State Bar* (1988) 44 Cal.3d 337, 341.) In addition to being punished as a crime or contempt, an attorney’s failure to comply with rule 9.20 is, inter alia, cause for disbarment, suspension, revocation of any pending disciplinary probation, and denial of an application for reinstatement after disbarment. (Cal. Rules of Court, rule 9.20(d).)

- (5) **California Rules of Court, Rule 9.20, Requirement Not Recommended:** It is not recommended that Respondent be ordered to comply with the requirements of California Rules of Court, rule 9.20, because
- (6) **Other Requirements:** It is further recommended that Respondent be ordered to comply with the following additional requirements:

ATTACHMENT TO
STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION

IN THE MATTER OF: STEPHEN GARY QUADE

CASE NUMBERS: 14-O-04027-YDR; 16-O-12317

FACTS AND CONCLUSIONS OF LAW.

Respondent admits that the following facts are true and that he is culpable of violations of the specified statutes and/or Rules of Professional Conduct.

The Guzman Matter (14-O-04027)

FACTS:

1. On May 5, 2008, Jose Guzman (“Guzman”) was convicted of Attempted Murder and Assault with a Deadly Weapon with Gang, Firearm Use and Great Bodily Injury Enhancements [Penal Code sections 664/187; 245(B); 186.22(b)(1); 12022.7; and 12022.53(d)], in the Fresno County Superior Court, Court Case No. F06906503.
2. On June 9, 2008, Guzman was sentenced to 42 years to life, and is currently serving his sentence at Corcoran State Prison.
3. On July 13, 2009, Guzman filed an Appellant’s Opening Brief in the Court of Appeal, Fifth Appellate District. The appellate brief was filed by Harry Zimmerman. On January 27, 2010, the Court of Appeal affirmed Guzman’s conviction. On March 22, 2010, Guzman filed a Petition for Review in the California Supreme Court. On April 14, 2010, the Supreme Court denied the Petition. On April 20, 2010, the Court of Appeal issued a Remittitur.
4. On August 21, 2010, Guzman’s mother, Adriana Poblete (“Poblete”), hired respondent to prepare and file a Writ of Habeas Corpus Petition (“writ”) on behalf of her son and paid respondent \$7,500 as advanced fees.
5. On August 26, 2010, respondent wrote a letter to Guzman at Salinas Valley State Prison introducing himself and designating attorney Richard Windmiller as his “associate counsel”. Respondent sent Guzman the fee agreement for his signature. At the same time, respondent entered into an oral agreement with Windmiller to pay Windmiller \$7,500 to research, prepare and file the writ on behalf of Guzman. Respondent and Windmiller shared an office suite from March 2009 through October 2013, as solo practitioners with no affiliation with each other.
6. On August 30, 2010, Guzman signed a written fee agreement to pay respondent \$15,000 in attorney’s fees and \$2,500 in investigative fees to prepare and file the writ on his behalf. The fee agreement was signed by respondent only. There was no separate fee agreement between Guzman and Windmiller. This same day, Poblete paid \$1,200 to respondent. Respondent never deposited the advanced costs into a client trust account.

7. On September 17, 2010, Poblete paid \$1,150 to respondent.
8. On September 21, 2010, Poblete paid \$5,000 to respondent.
9. On November 15, 2010, respondent sent a letter to Guzman which stated it will take anywhere from nine months to 18 months to set aside the guilty verdict.
10. On July 15, 2011, Poblete paid \$2,000 to respondent. At that point, the total amount now paid to respondent as advanced fees and costs was \$16,850 — \$15,000 in advanced fees and \$1,850 in advanced costs. Respondent failed to deposit the \$1,850 in advanced costs in a Client Trust Account.
11. In April 2013, Poblete emailed Windmiller for an update on her son's case. Windmiller informed her that he had not been paid the full amount from respondent, and that there was still \$2,500 owed to him by respondent. Poblete then paid \$500 directly to Windmiller, to make up for what Windmiller claimed was still owed to him by respondent.
12. In June 2013, Guzman's girlfriend, Amanda Turner, paid \$1,500 to Windmiller. At this point, the total amount paid to both respondent and Windmiller was \$18,850.
13. On June 17, 2013, Windmiller emailed Poblete informing her she owed another \$1,000. Poblete replied back that she thought it was only another \$500 as she has paid \$2,000 of the remaining \$2,500 he said was still owed to him, but she will pay another \$500 if she needs to. He did not reply back, but proceeded to write the writ without the last \$500 payment. Thereafter, nothing was filed on Guzman's behalf.
14. On September 22, 2013, Guzman filed a complaint with the State Bar based on respondent's failure to file the writ.
15. On October 18, 2013, the State Bar sent respondent a letter asking him to respond to the allegations in Guzman's complaint. After being notified about Guzman's State Bar complaint, on October 25, 2013, Windmiller filed the writ with the Fifth Appellate District Court, over three years after Poblete initially hired respondent to file the writ.
16. On November 27, 2013, the Court of Appeal denied the writ on the grounds that it untimely, conclusory, and failed to show the petitioner had exhausted his superior court habeas remedies before filing the writ. Respondent performed no services of value on behalf of Guzman and earned no portion of the advanced fees paid.
17. As part of the State Bar investigation, respondent sent an accounting to the State Bar on December 8, 2014, claiming that it was drafted by Richard Windmiller. The accounting showed services rendered in the amount of \$15,425. In truth and in fact, respondent prepared the accounting and knew the information contained in it was false.
18. On June 14, 2018, the State Bar conducted a deposition of respondent, where he falsely stated, under oath, that Windmiller drafted that accounting.

CONCLUSIONS OF LAW:

19. By failing to provide the legal services for which he was hired, by failing to file the writ within the statutory period, by failing to file a legally sufficient writ, and by failing to supervise the work of Windmiller, respondent failed to competently perform in violation of rule 3-110(A) of the Rules of Professional Conduct.
20. By knowingly submitting a false accounting to the State Bar in the disciplinary investigation and by falsely stating that Windmiller had prepared it, and by falsely testifying under oath at a deposition that the accounting was drafted by Richard Windmiller, when respondent knew respondent drafted it, respondent committed acts involving moral turpitude, in willful violation of Business and Professions Code section 6106.
21. By failing to return to Guzman the unearned fees \$16,850 after respondent failed to provide the legal services for which he was hired, respondent failed to refund the unearned fees, in willful violation of rule 3-700(D)(2) of the Rules of Professional Conduct.
22. By failing to provide a true accounting of the \$16,850 paid as advanced fees by Guzman, respondent failed to render appropriate accounts to a client regarding all funds coming into respondent's possession, in willful violation of rule 4-100(B)(3) of the Rules of Professional Conduct.
23. By failing to deposit \$1,850 for advanced investigative costs into a Client Trust Account, respondent failed to deposit funds in a bank account labelled "Trust Account," "Client's Funds Account" or words of similar import, in willful violation of rule 4-100(A) of the Rules of Professional Conduct.
24. By failing to use \$1,850 paid by the client in advanced costs for the benefit of the client, respondent intentionally misappropriated costs, in willful violation of Business and Professions Code section 6106.
25. By failing to obtain written consent from Guzman when accepting payment from Poblete, respondent failed to obtain consent from a client for compensation from a third party, in willful violation of rule 3-310(F)(3) of the Rules of Professional Conduct.

The Espinosa Matter (16-O-12317)

FACTS:

26. On February 13, 2008, Aldo Espinosa ("Espinosa") pled guilty to one count of Attempted Murder with an Enhancement for the Intentional Discharge of a Firearm [Penal Code sections 664/187, 12022.53(c)], Merced County Superior Court Case Docket No. MF45246.
27. On April 8, 2008, Espinosa's trial attorney, Carlos Fuentes ("Fuentes"), submitted for filing a notice of appeal in Merced County to preserve Espinosa's rights. Fuentes was not hired to handle the appeal.

28. On April 9, 2008, Espinosa's father, Silbestre Espinosa ("Silbestre") hired respondent to file an appeal and resolve Espinosa's two other criminal cases ("escape case") on behalf of Espinosa, and signed a fee agreement. The fee agreement provided that respondent would charge \$30,000 for the appeal and \$7,000 for the escape case. Silbestre paid respondent \$7,000 as advanced fees for the escape case.
29. On April 16, 2008, Silbestre paid respondent Quade \$10,000 as advanced fees for the appeal.
30. On April 23, 2008, the Notice of Appeal submitted by Fuentes was filed with the Court of Appeal, Fifth Appellate District, Case No. F055124. On the same date, Silbestre paid respondent \$5,000 as advanced fees for the appeal.
31. On May 6, 2008, the Court of Appeal set the briefing schedule for Espinosa's appeal. The appellant opening brief was due on June 16, 2008. The briefing schedule was sent to Espinosa in prison. Respondent knew about the notice of appeal and was aware of the deadlines, but failed to substitute in as appellate counsel.
32. On June 16, 2008, respondent failed to file an opening brief with the Court of Appeal and failed to inform the client that he missed the deadline.
33. On June 26, 2008, Silbestre paid respondent \$5,000 as advanced fees for the appeal. Thereafter, respondent failed to perform any work on behalf of Espinosa and did not earn any of the advanced fees paid.
34. On July 22, 2008, the Court of Appeal dismissed Espinosa's appeal due to a failure to file an opening brief. The dismissal notice was sent to Espinosa in prison because respondent had not substituted in as his counsel. Respondent was aware of the dismissal.
35. On September 22, 2008, the Court of Appeal issued a Remittitur, finalizing the decision on appeal. The Remittitur was also sent to Espinosa in prison.
36. On October 30, 2008, unaware of the dismissal, Silbestre paid respondent \$5,000 as advanced fees, for a total amount of \$25,000 paid as advanced fees for the appeal.
37. From October 30, 2008 through September 27, 2011, respondent misrepresented to Silbestre and his family that he was working on the appeal. Respondent failed to inform Silbestre, Espinosa, or anyone else in the family that Espinosa's appeal was dismissed by the court for a failure to file an opening brief.
38. In September 2011, Silbestre and respondent engaged in a verbal argument when Silbestre confronted respondent about not doing any work on the appeal. Respondent said he was "already done" with the case and would no longer work on it.
39. On July 31, 2012, Silbestre met with attorney David Cohen ("Cohen") at Cohen's office. Cohen checked the Court of Appeal website and learned that the appeal had been dismissed for a failure to file Appellant's Opening Brief.

40. On June 19, 2013, Cohen filed a Motion to Recall the Remittitur on behalf of Espinosa in an attempt to reinstate Espinosa's appellate rights.
41. On July 23, 2013, Cohen filed a Petition for a Writ of Habeas Corpus in the Merced County Superior Court on behalf of Espinosa, case no. MF45246. On August 9, 2013, the Superior Court dismissed the petition due to a lack of jurisdiction. On July 30, 2013, Cohen filed a federal Writ of Habeas Corpus in the U.S. District Court, Eastern District of California, Case No. 1:13-cv-01191-LJO-SKO. On December 27, 2013, the District Court adopted the Findings and Recommendations of the Magistrate Judge dismissing the petition without prejudice.
42. On November 7, 2013, the Court of Appeal, Fifth District Court ordered respondent and Carlos Fuentes to file informal responses to Cohen's Motion to Recall the Remittitur.
43. On November 3, 2014, respondent filed his second informal response with the Court of Appeal, and made the following misrepresentations under penalty of perjury:
 - a. Respondent falsely stated that he was not retained to file an appeal, but to "resolve the two pending felonies and review the status of Mr. Fuentes' case as it was [his] understanding an appeal had already been filed", when in fact, respondent knew he was hired to file an appeal in addition to resolving Espinosa's two pending felonies;
 - b. Respondent falsely stated that he contacted Carlos Fuentes and "was advised [by him] an appeal had already been filed", when in fact, respondent knew Carlos Fuentes never informed him that an appeal had been filed;
 - c. Respondent falsely stated that he was not retained to file an appeal, but to "check the status of the appeal that had already been filed" when in fact, respondent knew he had been hired to prepare and file the appeal; and
 - d. Respondent falsely stated that it was "at that visit at the State prison that [he] first learned and discussed the attempted murder case with Mr. Aldo Espinosa", when in fact, respondent knew about the attempted murder case when he was first retained to prepare and file the appeal for that specific case.

CONCLUSIONS OF LAW:

44. By failing to provide the legal services for which he was hired, and by failing to file an opening brief or any other pleadings on behalf of Espinosa, respondent failed to competently perform in violation of rule 3-110(A) of the Rules of Professional Conduct.
45. By failing to inform Espinosa that the appeal was dismissed on July 22, 2008, due to respondent's failure to file an opening brief, respondent failed to inform the client of a significant event, in willful violation of Business and Professions Code section 6068(m).
46. By failing to return to Espinosa the unearned fees of \$25,000, after he failed to provide the legal services for which he was hired, respondent failed to refund the unearned fees, in willful violation of rule 3-700(D)(2) of the Rules of Professional Conduct.
47. By failing to provide an accounting of the \$25,000 paid as advanced fees on behalf of Espinosa, respondent failed to render appropriate accounts to a client regarding all funds coming into respondent's possession, in willful violation of rule 4-100(B)(3) of the Rules of Professional Conduct.

48. By making false statements in his second informal response that he filed with the Court of Appeal, respondent committed acts involving moral turpitude, dishonesty, or corruption, in willful violation of Business and Professions Code section 6106.
49. By failing to obtain written consent from Espinosa when accepting payment from Silbestre, respondent failed to obtain consent from a client for compensation from a third party, in willful violation of rule 3-310(F)(3) of the Rules of Professional Conduct.

AGGRAVATING CIRCUMSTANCES.

Multiple Acts 1.5(b): Respondent engaged in 11 acts of misconduct in his representation of two clients. This represents multiple acts of wrongdoing.

Harm 1.5(j): Respondent accepted \$16,850 in fees and costs on behalf of Guzman, and filed a deficient and untimely writ, depriving his client the use of those funds for that entire time period, causing significant financial harm. Respondent also accepted \$25,000 in fees on behalf of Espinosa for an appeal that was never filed, depriving Espinosa's family the use of those funds, causing significant financial harm.

Failure to Make Restitution 1.5(m): Respondent has failed to make restitution to his clients by failing to refund any portion of unearned fees and costs.

Vulnerability of Victim 1.5(n): Respondent's clients are extremely vulnerable since they are both incarcerated.

MITIGATING CIRCUMSTANCES.

Physical Difficulties (std. 1.6(d)): Respondent presented medical evidence that he suffered a heart attack in 2009 and underwent surgery on September 16, 2009 for a Cardiac Catheterization Procedure. Respondent's heart condition directly affected his ability to competently practice law and comply with his duties to his clients from 2009 through mid-2010. His heart condition has since improved.

Good Character (std. 1.6(f)): Respondent submitted 10 character letters from individuals aware of the full extent of respondent's misconduct who attest to his integrity, honesty and professionalism. The reference letters are from friends, relatives, colleagues, and former clients.

No Prior Record of Discipline: Although respondent's misconduct is serious, he is entitled to mitigation for having practiced law for approximately 26 years without discipline. (*In the Matter of Riordan* (Review Dept. 2007) 5 Cal. State Bar Ct. Rptr. 41, 49.)

Pretrial Stipulation: Respondent is entitled to mitigation for entering into a stipulation with the Office of Chief Trial Counsel prior to the trial in the above referenced disciplinary matter, thereby saving State Bar Court time and resources. (*Silva-Vidor v. State Bar* (1989) 49 Cal.3d 1071, 1079 [where mitigative credit was given for entering into a stipulation as to facts and culpability].)

AUTHORITIES SUPPORTING DISCIPLINE.

The Standards for Attorney Sanctions for Professional Misconduct “set forth a means for determining the appropriate disciplinary sanction in a particular case and to ensure consistency across cases dealing with similar misconduct and surrounding circumstances.” (Rules Proc. Of State Bar, tit. IV, Stds. for Atty. Sanctions for Prof. Misconduct, std. 1.1.) The standards help fulfill the primary purpose of discipline, which include: protection of the public, the courts and the legal profession; maintenance of the highest professional standards; and, preservation of public confidence in the legal profession. (See std. 1.1; *In re Morse* (1995) 11 Cal.4th 184, 205.)

Although not binding, the standards are entitled to “great weight” and should be followed “whenever possible” in determining level of discipline. (*In re Silverton* (2005) 36 Cal.4th 81, 92, quoting *In re Brown* (1995) 12 Cal. 4th 205, 220 and *In re Young* (1989) 49 Cal.3d 257, 267, fn. 11.) Adherence to the standards in the great majority of cases serves the valuable purpose of eliminating disparity and assuring consistency, that is, the imposition of similar attorney discipline for instances of similar attorney misconduct. (*In re Naney* (1990) 51 Cal.3d 186, 190.) If a recommendation is at the high end or low end of a Standard, an explanation must be given as to how the recommendation was reached. (Std. 1.1.) Any discipline recommendation that deviates from the Standards must include clear reasons for the departure. (Std. 1.1; *Blair v. State Bar* (1989) 49 Cal.3d 762, 776, fn. 5.)

In determining whether to impose a sanction greater or lesser than that specified in a given Standard, in addition to the factors set forth in the specific Standard, consideration is to be given to the primary purposes of discipline; the balancing of all aggravating and mitigating circumstances; the type of misconduct at issue; whether the client, public, legal system or profession was harmed; and the member’s willingness and ability to conform to ethical responsibilities in the future. (Stds. 1.7(b) and (c).)

The most severe sanction applicable to respondent’s misconduct in relation to all matters is found in Standard 2.11. Standard 2.11 provides: “Disbarment or actual suspension is the presumed sanction for an act of moral turpitude, dishonesty, fraud, corruption, intentional or grossly negligent misrepresentation, or concealment of a material fact. The degree of sanction depends on the magnitude of the misconduct; the extent to which the misconduct harmed or misled the victim, which may include the adjudicator; the impact on the administration of justice, if any; and the extent to which the misconduct related to the member’s practice of law.”

Here, respondent’s misconduct is serious as it relates to two incarcerated clients in two matters. In the Guzman matter, respondent failed to file a Writ of Habeas Corpus within the statutory period, failed to supervise Richard Windmiller, submitted a false accounting to the State Bar and made misrepresentations under oath, failed to provide an accounting to the client, failed to refund unearned fees, failed to deposit advanced costs in a trust account, and misappropriated costs. In the Espinosa matter, respondent failed to file an opening brief, failed to inform Espinosa that no criminal appeal had been filed and that the appeal had been dismissed, failed to refund unearned fees, concealed that the appeal had been dismissed, and made misrepresentations to the Court. To determine the appropriate level of discipline, consideration must also be given to the aggravating and mitigating circumstances. In aggravation, respondent caused significant financial harm to the clients, failed to make restitution, committed multiple acts of misconduct, and the victims are vulnerable victims because both are incarcerated. In mitigation, respondent has practiced law for 26 years without discipline, is entitled to

mitigation for entering into a pretrial settlement, for physical difficulties he was undergoing at the time the misconduct occurred, and for good character. Based on the serious nature of the misconduct, a long actual suspension is warranted under the Standards.

Case law is instructive. In *Borré v. State Bar* (1991) 52 Cal.3d 1047, the attorney also represented an incarcerated client and was found culpable of failing to keep the client informed of significant developments, abandoning his client, intentionally deceiving his client by informing him the appeal had been abandoned when it had been dismissed, and misled the State Bar by telling the investigator he had obtained an extension of time to check if there would be an appeal when he had told the Court of Appeal he would handle the appeal and was legally obligated to do so, which involved moral turpitude. In aggravation, the attorney had been dishonest for the fabrication of his letter and subsequent lies, and the incarcerated client was a vulnerable client. The court afforded little mitigative credit to the attorney for lack of discipline for 20 years because it was coupled with such serious misconduct. The Supreme Court imposed a two-year actual suspension.

Respondent's misconduct is more serious than in *Borré*, but there is significantly more mitigation, since respondent suffered physical difficulties from a heart attack and subsequent surgery that occurred at the time of the misconduct, which directly caused some of the misconduct. As such, discipline less than that imposed in *Borré* is appropriate.

On balance, a one-year actual suspension, two years' stayed suspension, and a two-year probationary period, with the condition that respondent stay suspended until he pays restitution, will serve the purposes of attorney discipline.

COSTS OF DISCIPLINARY PROCEEDINGS.

Respondent acknowledges that the Office of Chief Trial Counsel has informed respondent that as of January 7, 2019, the discipline costs in this matter are \$3,857. Respondent further acknowledges that should this stipulation be rejected or should relief from the stipulation be granted, the costs in this matter may increase due to the cost of further proceedings.

EXCLUSION FROM MINIMUM CONTINUING LEGAL EDUCATION ("MCLE") CREDIT

Respondent may not receive MCLE credit for completion of State Bar Ethics School, State Bar Client Trust Accounting School and/or any other educational course(s) to be ordered as a condition of suspension. (Rules Proc. of State Bar, rule 3201.)

WAIVER OF VARIANCE BETWEEN NOTICE OF DISCIPLINARY CHARGES AND STIPULATED FACTS AND CULPABILITY


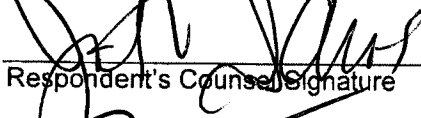
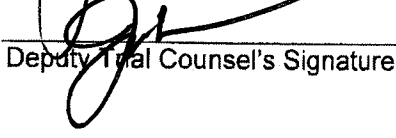
The parties waive any variance between the Notice of Disciplinary Charges filed on October 10, 2018 and the facts and/or conclusions of law contained in this stipulation. Additionally, the parties waive the issuance of an amended Notice of Disciplinary Charges. The parties further waive the right to the filing of a Notice of Disciplinary Charges and to a formal hearing on any charge not included in the pending Notice of Disciplinary Charges.

(Do not write above this line.)

In the Matter of: STEPHEN GARY QUADE	Case Number(s): 14-O-04027-YDR; 16-O-12317
---	---

SIGNATURE OF THE PARTIES

By their signatures below, the parties and their counsel, as applicable, signify their agreement with each of the recitations and each of the terms and conditions of this Stipulation Re Facts, Conclusions of Law, and Disposition.

<u>1/8/19</u> Date	 Respondent's Signature	Stephen Quade Print Name
<u>January 15, 2019</u> Date	 Respondent's Counsel Signature	Jonathan Arons, Esq. Print Name
<u>January 16, 2019</u> Date	 Deputy Trial Counsel's Signature	Jennifer Roque Print Name

(Do not write above this line.)

In the Matter of: STEPHEN GARY QUADE	Case Number(s): 14-O-04027; 16-O-12317
---	---

ACTUAL SUSPENSION ORDER

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

- The stipulated facts and disposition are APPROVED and the DISCIPLINE RECOMMENDED to the Supreme Court.
- The stipulated facts and disposition are APPROVED AS MODIFIED as set forth below, and the DISCIPLINE IS RECOMMENDED to the Supreme Court.
- All Hearing dates are vacated.

On pages 1 , 11, and 19 (the Signature Page) of the Stipulation, “14-O-0404027-YDR” is deleted and “14-O-04027” is inserted.

On page 1 of the Stipulation, after “Submitted to,” “Settlement Judge” is deleted and “Assigned Judge” is inserted.

On page 4 of the Stipulation, underneath “Additional mitigating circumstances,” “Good Character. See page 16.” is inserted.

On page 13 of the Stipulation, underneath the heading “CONCLUSIONS OF LAW,” the following is inserted: “All references to the Rules of Professional Conduct are to the former Rules of Professional Conduct.”

On page 17 of the Stipulation, fifth paragraph, line 2, “filed” is deleted and “file” is inserted.

On page 18 of the Stipulation, line 2, after “a long,” “period of” is inserted.

On the Signature Page of the Stipulation, in the footer, after “Page,” “19” is inserted.

The parties are bound by the stipulation as approved unless: 1) a motion to withdraw or modify the stipulation, filed within 15 days after service of this order, is granted; or 2) this court modifies or further modifies the approved stipulation. (See Rules Proc. of State Bar, rule 5.58(E) & (F).) **The effective date of this disposition is the effective date of the Supreme Court order herein, normally 30 days after the filed date of the Supreme Court order. (See Cal. Rules of Court, rule 9.18(a).)**

(Do not write above this line.)

Date

1/30/19



MANJARI CHAWLA
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 Court Specialist 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 San Francisco, on January 30, 2019, I deposited a true copy of the following document(s):

STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND
ORDER APPROVING

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 San Francisco, California, addressed as follows:

JONATHAN IRWIN ARONS
LAW OFC JONATHAN I ARONS
100 BUSH ST STE 918
SAN FRANCISCO, CA 94104

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

Jennifer E. Roque, Enforcement, San Francisco

I hereby certify that the foregoing is true and correct. Executed in San Francisco, California, on January 30, 2019.



Vincent Au
Court Specialist
State Bar Court