

# NOT FOR PUBLICATION

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State Bar Court of California Hearing Department San Francisco REPROVAL		
<b>Counsel For The State Bar</b>  <b>Hans Moore</b> <b>Deputy Trial Counsel</b> <b>180 Howard Street</b> <b>San Francisco, CA 94105</b>  <b>Bar # 309685</b>	<b>Case Number(s):</b> <b>15-C-11005-LMA</b>	<b>For Court use only</b>  <b>FILED</b>  <b>APR 18 2017</b> <i>MS</i>  STATE BAR COURT CLERK'S OFFICE SAN FRANCISCO
<b>In Pro Per Respondent</b>  <b>Shannon Henderson</b> <b>Law Offices of Shannon Henderson</b> <b>408 Lucera Court</b> <b>Roseville, CA 95747</b>  <b>Bar # 216104</b>	<b>Submitted to: Settlement Judge</b>  <b>STIPULATION RE FACTS, CONCLUSIONS OF LAW AND DISPOSITION AND ORDER APPROVING</b>  <b>PRIVATE REPROVAL</b>  <input type="checkbox"/> PREVIOUS STIPULATION REJECTED	
<b>In the Matter of:</b> <b>SHANNON HENDERSON</b>  <b>Bar # 216104</b>  <b>A Member of the State Bar of California (Respondent)</b>		

**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 3, 2001.
- (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 13 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."

(Effective April 1, 2016)



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RBT*

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- (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. (Check one option only):
- Costs are added to membership fee for calendar year following effective date of discipline (public reproof).
  - Case ineligible for costs (private reproof).
  - Costs are to be paid in equal amounts prior to February 1 for the following membership years: (Hardship, special circumstances or other good cause per rule 5.132, Rules of Procedure.) If Respondent fails to pay any installment as described above, or as may be modified by the State Bar Court, the remaining balance is 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.
- (9) The parties understand that:
- (a)  A private reproof imposed on a respondent as a result of a stipulation approved by the Court prior to initiation of a State Bar Court proceeding is part of the respondent's official State Bar membership records, but is not disclosed in response to public inquiries and is not reported on the State Bar's web page. The record of the proceeding in which such a private reproof was imposed is not available to the public except as part of the record of any subsequent proceeding in which it is introduced as evidence of a prior record of discipline under the Rules of Procedure of the State Bar.
  - (b)  A private reproof imposed on a respondent after initiation of a State Bar Court proceeding is part of the respondent's official State Bar membership records, is disclosed in response to public inquiries and is reported as a record of public discipline on the State Bar's web page.
  - (c)  A public reproof imposed on a respondent is publicly available as part of the respondent's official State Bar membership records, is disclosed in response to public inquiries and is reported as a record of public discipline on the State Bar's web page.

**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 or a separate attachment entitled "Prior Discipline."

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- (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.
- (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.
- (9)  **Indifference:** Respondent demonstrated indifference toward rectification of or atonement for the consequences of his or her misconduct.
- (10)  **Candor/Lack of Cooperation:** Respondent displayed a lack of candor and cooperation to victims of his/her misconduct, or to the State Bar during disciplinary investigations or proceedings.
- (11)  **Multiple Acts:** Respondent's current misconduct evidences multiple acts of wrongdoing.
- (12)  **Pattern:** Respondent's current misconduct demonstrates a pattern of misconduct.
- (13)  **Restitution:** Respondent failed to make restitution.
- (14)  **Vulnerable Victim:** The victim(s) of Respondent's misconduct was/were highly vulnerable.
- (15)  **No aggravating circumstances** are involved. See "Additional Facts Re Aggravating Circumstances", attachment page 9.

**Additional aggravating circumstances:**

**C. Mitigating Circumstances [see 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 his/her misconduct or to the State Bar during disciplinary investigation and proceedings. See "Additional Facts Re Mitigating Circumstances", attachment page 9.

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- (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 his/her misconduct. See "Additional Facts Re Mitigating Circumstances", attachment page 9.
- (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 him/her.
- (7)  **Good Faith:** Respondent acted with a good faith belief that was honestly held and objectively reasonable.
- (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 the member, such as illegal drug or substance abuse, and the difficulties or disabilities no longer pose a risk that Respondent will commit misconduct.
- (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 his/her control and which were directly responsible for the misconduct.
- (10)  **Family Problems:** At the time of the misconduct, Respondent suffered extreme difficulties in his/her 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 his/her misconduct. See "Additional Facts Re Mitigating Circumstances", attachment page 9.
- (12)  **Rehabilitation:** Considerable time has passed since the acts of professional misconduct occurred followed by subsequent rehabilitation.
- (13)  **No mitigating circumstances** are involved.

**Additional mitigating circumstances:**

**No Prior Discipline. See "Additional Facts Re Mitigating Circumstances", attachment page 9.  
Pretrial Stipulation. See "Additional Facts Re Mitigating Circumstances", attachment page 10.**

**D. Discipline:**

- (1)  **Private reproof (check applicable conditions, if any, below)**
- (a)  Approved by the Court prior to initiation of the State Bar Court proceedings (no public disclosure).
- (b)  Approved by the Court after initiation of the State Bar Court proceedings (public disclosure).

or

- (2)  **Public reproof (Check applicable conditions, if any, below)**

**E. Conditions Attached to Reproval:**

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- (1)  Respondent must comply with the conditions attached to the reproof for a period of one year.
- (2)  During the condition period attached to the reproof, Respondent must comply with the provisions of the State Bar Act and Rules of Professional Conduct.
- (3)  Within ten (10) days of any change, Respondent must report to the Membership Records Office of the State Bar and to the Office of Probation of the State Bar of California ("Office of Probation"), all changes of information, including current office address and telephone number, or other address for State Bar purposes, as prescribed by section 6002.1 of the Business and Professions Code.
- (4)  Within thirty (30) days from the effective date of discipline, Respondent must contact the Office of Probation and schedule a meeting with Respondent's assigned probation deputy to discuss these terms and conditions of reproof. Upon the direction of the Office of Probation, Respondent must meet with the probation deputy either in-person or by telephone. During the reproof conditions period, Respondent must promptly meet with the probation deputy as directed and upon request.
- (5)  Respondent must submit written quarterly reports to the Office of Probation on each January 10, April 10, July 10, and October 10 of the condition period attached to the reproof. Under penalty of perjury, Respondent must state whether Respondent has complied with the State Bar Act, the Rules of Professional Conduct, and all conditions of the reproof during the preceding calendar quarter. Respondent must also state in each report whether there are any proceedings pending against him or her in the State Bar Court and if so, the case number and current status of that proceeding. If the first report would cover less than 30 (thirty) days, that report must be submitted on the next following quarter date, and cover the extended period.

In addition to all quarterly reports, a final report, containing the same information, is due no earlier than twenty (20) days before the last day of the condition period and no later than the last day of the condition period.

- (6)  Respondent must be assigned a probation monitor. Respondent must promptly review the terms and conditions of reproof with the probation monitor to establish a manner and schedule of compliance. During the reproof conditions period, Respondent must furnish such reports as may be requested, in addition to the quarterly reports required to be submitted to the Office of Probation. Respondent must cooperate fully with the monitor.
- (7)  Subject to assertion of applicable privileges, Respondent must answer fully, promptly and truthfully any inquiries of the Office of Probation and any probation monitor assigned under these conditions which are directed to Respondent personally or in writing relating to whether Respondent is complying or has complied with the conditions attached to the reproof.
- (8)  Within one (1) year of the effective date of the discipline herein, Respondent must provide to the Office of Probation satisfactory proof of attendance at a session of the Ethics School, and passage of the test given at the end of that session.  
 No Ethics School recommended. Reason: .
- (9)  Respondent must comply with all conditions of probation imposed in the underlying criminal matter and must so declare under penalty of perjury in conjunction with any quarterly report to be filed with the Office of Probation.
- (10)  Respondent must provide proof of passage of the Multistate Professional Responsibility Examination ("MPRE"), administered by the National Conference of Bar Examiners, to the Office of Probation within one year of the effective date of the reproof.

No MPRE recommended. Reason: See "MPRE Exception", attachment page 11.

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(11)  The following conditions are attached hereto and incorporated:

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Substance Abuse Conditions | <input type="checkbox"/> Law Office Management Conditions |
| <input type="checkbox"/> Medical Conditions                    | <input type="checkbox"/> Financial Conditions             |

**F. Other Conditions Negotiated by the Parties:**



police department performed a welfare check on respondent later that day. Respondent was intoxicated at the time of the welfare check, but did not return to the hospital.

7. Shortly before 12:20 p.m. on the following day, July 1, 2014, respondent was involved in an automobile accident with Ariana and Bruce Bakeman ("Bakemans") in Roseville, CA. Respondent rear-ended the Bakeman's vehicle. Ariana Bakeman was evaluated at the scene for complaints of neck and back pain and dizziness.

8. Both vehicles pulled into a Target parking lot. Respondent spoke with the passenger, Bruce Bakeman, for a few moments and provided him with her driver's license.

9. Contrary to the Bakemans' request for respondent to await police arrival, respondent left the scene.

10. The Bakemans reported the accident to the Roseville Police Department as a hit and run collision with injuries.

11. The license plate number provided by the Bakemans was traced to respondent. Ariana Bakeman subsequently positively identified respondent in a photo lineup.

12. At approximately 5:30 pm that day, respondent was arrested at a nearby Johnny Garlic's restaurant and jailed for violation of Penal Code section 849(b)(2). While in jail, respondent was also charged with violation of Vehicle Code section 20001(a) for the earlier auto accident.

13. One of the officers that investigated the auto accident recognized respondent's name, and recalled performing welfare checks at respondent's home, including the evening before, and previously arresting her for driving under the influence.

14. The Bakemans' property damage claim and Ariana Bakeman's bodily injury claim were resolved by respondent's insurance carrier on behalf of respondent.

#### OTHER FACTS AND CIRCUMSTANCES

15. On July 14, 2009, respondent became intoxicated from the consumption of alcohol and wandered onto a construction site. Respondent detained pursuant to Penal Code section 849 (b)(2). Respondent was issued a citation for violation of Penal Code section 647(f). The case was dismissed on September 28, 2009 in the interest of justice.

16. On October 3, 2009, respondent reported being assaulted by her then husband. On October 6, 2009, respondent left a message on the investigating officer's voicemail that she had lied about the assault to avoid arrest for public drunkenness or professional discipline. Respondent was charged with violation of Penal Code section 148.5 [Making a False Report of a Crime], a misdemeanor. The case was dismissed in the interest of justice on September 16, 2010.

#### CONCLUSIONS OF LAW:

17. The facts and circumstances surrounding respondent's conviction for violation of Vehicle Code section 23104(a) [Reckless Driving with Injury], a misdemeanor, did not involve moral turpitude but did involve other misconduct warranting discipline.



## **ADDITIONAL FACTS RE AGGRAVATING CIRCUMSTANCES**

There are no known aggravating circumstances.

## **ADDITIONAL FACTS RE MITIGATING CIRCUMSTANCES.**

### **Spontaneous Candor and Cooperation (Std. 1.6(e)):**

**Std. 1.6(e)** provides that spontaneous candor and cooperation displayed to the victims of the misconduct or to the State Bar is a mitigating circumstance.

During her initial meeting with the Deputy Trial Counsel and at the initial status conference, respondent immediately accepted responsibility for her misconduct and expressed a willingness to cooperate in the proceedings and achieve a prompt resolution.

### **Extraordinary Good Character (Std. 1.6(f)):**

**Std. 1.6(f)** provides that extraordinary good character attested to by a wide range of references in the legal and general communities, who are aware of the full extent of the misconduct is a mitigating circumstance.

Respondent provided four character letters, including from her mother, a friend, a professional acquaintance, and a former co-worker from the public defender's office. Each reference, notwithstanding their knowledge of her conviction and alcohol problems, attested to respondent's integrity, honesty, commitment to providing pro bono services to the disadvantaged, and rehabilitation efforts through Alcoholics Anonymous. (See *In the Matter of Davis* (Review Dept. 2003) 4 Cal. State Bar Ct. Rptr. 576, 591-592 [significant mitigation given for testimony of three witnesses with long-standing familiarity and broad knowledge of attorney's good character].)

### **Prompt Objective Steps (Std. 1.6(g)):**

**Std 1.6(g)** provides that prompt objective steps, demonstrating spontaneous remorse and recognition of the wrongdoing and timely atonement is a mitigating circumstance.

Within three days of being released from jail on July 3, 2014, respondent took immediate steps to address her alcohol problems by voluntarily enrolling in an one year intensive outpatient chemical dependency program and seeking support through participation in Alcoholics Anonymous and religious activities. She completed the outpatient program shortly after her criminal case settled in 2015.

**No Prior Discipline:** Mitigation is permitted for the absence of prior discipline over many years of practice, notwithstanding the seriousness of the present misconduct. (See *In the Matter of Riordan* (Review Dept. 2007) 5 Cal. State Bar Ct. Rptr. 41, 49.) Significant weight is afforded for more than ten years of discipline-free practice. (See *Hawes v. State Bar* (1990) 51 Cal. 3d 587, 596.)

Respondent had approximately 13 years of discipline free practice at the time of her misconduct in 2014 (eight years of discipline free practice at the time of the citation for public drunkenness on July 14,

2009). There is no evidence to refute her claim of sobriety for the past 2 ½ years or to suggest that her misconduct will recur.

**Pretrial Stipulation:** By entering into this stipulation, respondent has acknowledged misconduct and is entitled to mitigation for recognition of wrongdoing and saving the State Bar significant resources and time. (See *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]; *In the Matter of Spaith* (Review Dept. 1996) 3 Cal. State Bar Ct. Rptr. 511, 521 [where the attorney's stipulation to facts and culpability was held to be a mitigating circumstance].)

#### **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. All further references to standards are to this source.) The standards help fulfill the primary purposes 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 disciplinary 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 less 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).)

Respondent was convicted of reckless driving with injury (Vehicle Code section 23104(a)). While the conviction itself does not give the appearance that alcohol was a factor in the underlying auto accident, the facts and circumstances surrounding the conviction demonstrate that respondent's alcohol problem was the primary source of her personal problems and her several contacts with law enforcement between 2009 and 2014. Therefore, respondent's alcohol problems are considered as part of the discipline analysis.

Misdemeanor violations for driving recklessly or under the influence of alcohol do not per se involve moral turpitude. (See *In re Kelley* (1990) 52 Cal.3d 487, 494.)

**Std. 2.16** imposes suspension or reproof for a misdemeanor conviction that does not involve moral turpitude but involves other misconduct warranting discipline.

Modest discipline is warranted by the facts of this case. (See *In re Titus* (1989) 47 Cal.3d 1105 [public reproof imposed on attorney convicted of carrying concealed firearm, carrying loaded firearm, and reckless driving]; *In re Kelley, supra*, 52 Cal.3d 487 [public reproof imposed on attorney twice convicted of drunk driving and violation of criminal probation].)

Titus' additional convictions for carrying concealed firearm and carrying loaded firearm outweigh the other facts and circumstances present here. And, despite her admitted problems with alcohol, respondent does not have any DUI convictions (compared to Kelley's two) and she made an effort to obtain treatment for her alcohol problems immediately before the 2014 auto accident. Also, respondent voluntarily enrolled in a treatment program less than a week after the arrest resulting in her conviction. (See *In the Matter of Respondent I*, 2 Cal. State Bar Ct. Rptr. 260 [respondent credited with showing respect for the legal system and understanding the seriousness of his misconduct by abstaining from alcohol and beginning an intense psychotherapy program].) Further, there is no information to refute respondent's (and her references') claim of rehabilitation. (See *In the Matter of Respondent I*, 2 Cal. State Bar Ct. Rptr. 260 [respondent's five years of sobriety demonstrated rehabilitation, a significant factor].)

Balancing all factors, including the absence of aggravation and the presence of several mitigating factors, a level of discipline less than that imposed in *In re Titus, supra*, 47 Cal.3d 1105 and *In re Kelley, supra*, 52 Cal.3d 487 is appropriate. A private reproof is sufficient to protect the public, the courts and the legal profession; maintain the highest professional standards; and preserve public confidence in the legal profession.

#### **MPRE EXCEPTION**

The protection of the public and the interests of the respondent do not require passage of the MPRE in this case. (See *In the Matter of Respondent G* (Review Dept. 1992) 2 Cal. State Bar Ct. Rptr. 181 and rule 9.19, Cal. Rules of Court.)

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

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

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In the Matter of: <b>SHANNON HENDERSON</b>	Case Number(s): <b>15-C-11005-PEM</b>
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### Substance Abuse Conditions

- a.  Respondent must abstain from use of any alcoholic beverages, and shall not use or possess any narcotics, dangerous or restricted drugs, controlled substances, marijuana, or associated paraphernalia, except with a valid prescription.
- b.  Respondent must attend at least four (4) meetings per month of:
- Alcoholics Anonymous
  - Narcotics Anonymous
  - The Other Bar
  - Other program

As a separate reporting requirement, Respondent must provide to the Office of Probation satisfactory proof of attendance during each month, on or before the tenth (10<sup>th</sup>) day of the following month, during the condition or probation period.

- c.  Respondent must select a license medical laboratory approved by the Office of Probation. Respondent must furnish to the laboratory blood and/or urine samples as may be required to show that Respondent has abstained from alcohol and/or drugs. The samples must be furnished to the laboratory in such a manner as may be specified by the laboratory to ensure specimen integrity. Respondent must cause the laboratory to provide to the Office of Probation, at the Respondent's expense, a screening report on or before the tenth day of each month of the condition or probation period, containing an analysis of Respondent's blood and/or urine obtained not more than ten (10) days previously.
- d.  Respondent must maintain with the Office of Probation a current address and a current telephone number at which Respondent can be reached. Respondent must return any call from the Office of Probation concerning testing of Respondent's blood or urine within twelve (12) hours. For good cause, the Office of Probation may require Respondent to deliver Respondent's urine and/or blood sample(s) for additional reports to the laboratory described above no later than six hours after actual notice to Respondent that the Office of Probation requires an additional screening report.
- e.  Upon the request of the Office of Probation, Respondent must provide the Office of Probation with medical waivers and access to all of Respondent's medical records. Revocation of any medical waiver is a violation of this condition. Any medical records obtained by the Office of Probation are confidential and no information concerning them or their contents will be given to anyone except members of the Office of Probation, Office of the Chief Trial Counsel, and the State Bar Court who are directly involved with maintaining, enforcing or adjudicating this condition.


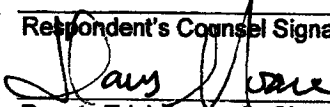
Other:

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In the Matter of: <b>SHANNON HENDERSON</b>	Case number(s): <b>15-C-11005-PEM</b>
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**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>4-3-17</u> Date	 Respondent's Signature	<u>SHANNON HENDERSON</u> Print Name
<u>N/A</u> Date	<u>N/A</u> Respondent's Counsel Signature	<u>N/A</u> Print Name
<u>4/10/17</u> Date	 Deputy Trial Counsel's Signature	<u>HANS MOORE</u> Print Name

(Do not write above this line.)

In the Matter of: <b>SHANNON HENDERSON</b>	Case Number(s): <b>15-C-11005-LMA</b>
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### REPROVAL ORDER

Finding that the stipulation protects the public and that the interests of Respondent will be served by any conditions attached to the reproof, 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 REPROVAL IMPOSED.
- The stipulated facts and disposition are APPROVED AS MODIFIED as set forth below, and the REPROVAL IMPOSED.
- All court dates in the Hearing Department are vacated.

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 rule 5.58(E) & (F), Rules of Procedure.) Otherwise the stipulation shall be effective 15 days after service of this order.

Failure to comply with any conditions attached to this reproof may constitute cause for a separate proceeding for willful breach of rule 1-110, Rules of Professional Conduct.

April 18, 2017  
Date

Pat E. McElroy  
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 San Francisco, on April 18, 2017, 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:

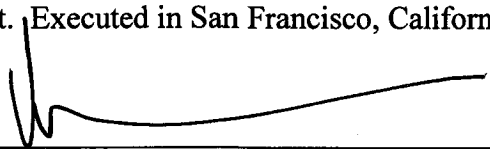
- by first-class mail, with postage thereon fully prepaid, through the United States Postal Service at San Francisco, California, addressed as follows:

SHANNON M. HENDERSON  
LAW OFC SHANNON HENDERSON  
408 LUCERA CT  
ROSEVILLE, CA 95747

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

Hans I. Moore, Enforcement, San Francisco

I hereby certify that the foregoing is true and correct. Executed in San Francisco, California, on April 18, 2017.

  
\_\_\_\_\_  
Vincent Au  
Case Administrator  
State Bar Court