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Public Matter
FILED MB

Jan 2 2020

**STATE BAR COURT
CLERK'S OFFICE
SAN FRANCISCO**

STATE BAR COURT

HEARING DEPARTMENT - SAN FRANCISCO

11 In the Matter of:) Case No.SBC-20-O-00001
12 ALLEN CLARENCE HASSAN,)
13 No. 104024,) NOTICE OF DISCIPLINARY CHARGES
14) (OCTC Case Nos. 18-O-15134; 19-O-15428)
15 An Attorney of the State Bar)

NOTICE - FAILURE TO RESPOND!

17 **IF YOU FAIL TO FILE A WRITTEN ANSWER TO THIS NOTICE**
18 **WITHIN 20 DAYS AFTER SERVICE, OR IF YOU FAIL TO APPEAR AT**
19 **THE STATE BAR COURT TRIAL:**

- 20 (1) **YOUR DEFAULT WILL BE ENTERED;**
21 (2) **YOUR STATUS WILL BE CHANGED TO INACTIVE AND YOU**
22 **WILL NOT BE PERMITTED TO PRACTICE LAW;**
23 (3) **YOU WILL NOT BE PERMITTED TO PARTICIPATE FURTHER IN**
24 **THESE PROCEEDINGS UNLESS YOU MAKE A TIMELY MOTION**
25 **AND THE DEFAULT IS SET ASIDE, AND;**
26 (4) **YOU SHALL BE SUBJECT TO ADDITIONAL DISCIPLINE.**
27 **SPECIFICALLY, IF YOU FAIL TO TIMELY MOVE TO SET ASIDE**
28 **OR VACATE YOUR DEFAULT, THIS COURT WILL ENTER AN**
ORDER RECOMMENDING YOUR DISBARMENT WITHOUT
FURTHER HEARING OR PROCEEDING. SEE RULE 5.80 ET SEQ.,
RULES OF PROCEDURE OF THE STATE BAR OF CALIFORNIA.

1 The State Bar of California alleges:

2 JURISDICTION

3 1. Allen Clarence Hassan ("respondent") was admitted to the practice of law in the State
4 of California on September 14, 1982. Respondent was a licensed attorney at all times pertinent
5 to these charges, and is currently a licensed attorney of the State Bar of California.
6

7 COUNT ONE

8 OCTC Case No. 18-O-15134
9 Rules of Professional Conduct, former rule 3-110(A)
[Failure to Perform Competently]

10 2. On or about August 21, 2012, Jerry Littleton retained respondent to perform legal
11 services, namely to represent him in an action against his employer, *Jerry Littleton v. Pacific Gas*
12 *& Electric Company, et al.*, Eastern District of California, case no. 2:12-cv-02236, in which
13 respondent intentionally, recklessly, or repeatedly failed to perform with competence, in willful
14 violation of the Rules of Professional Conduct, former rule 3-110(A), as follows:

- 15 A. By failing to serve defendants with the Complaint, as ordered by the court on or about
16 August 28, 2012;
- 17 B. By failing to serve defendants with the Order Setting Status (Pretrial Scheduling)
18 Conference, as ordered by the court on or about August 28, 2012;
- 19 C. By failing to file a status report, as ordered by the court on or about August 28, 2012;
- 20 D. By failing to oppose Defendants' Motion to Dismiss, in accordance with Local Rule
21 230, as ordered by the court, on or about April 11, 2013;
- 22 E. By failing to respond to an Order to Show Cause as ordered by the court on or about
23 June 28, 2013;
- 24 F. By failing to file a timely opposition to defendant South Feather Water and Power
25 Agency's August 16, 2013 Motion for Partial Judgment on the Pleadings;
26

- 1 G. By failing to respond to an Order to Show Cause as ordered by the court on or about
2 September 30, 2013;
- 3 H. By failing to respond to an Order to Show Cause as ordered by the court on or about
4 October 10, 2013;
- 5 I. By failing to file a status report as ordered by the court on or about December 17,
6 2013;
- 7 J. By failing to respond to an Order to Show Cause as ordered by the court on or about
8 January 17, 2014; and
- 9 K. By failing to competently oppose dismissal of the case after dismissal was ordered on
10 February 11, 2014.

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12 COUNT TWO

13 OCTC Case No. 18-O-15134
14 Business and Professions Code section 6068(m)
15 [Failure to Communicate Significant Development]

16 3. On or about February 2, 2014, and thereafter, respondent failed to keep his client,
17 Jerry Littleton, reasonably informed of significant developments regarding *Jerry Littleton v.*
18 *Pacific Gas & Electric Company*, Eastern District of California, case no. 2:12-cv-02236 in
19 willful violation of section 6068(m) of the Business and Professions Code, by failing to inform
20 his client that the case was dismissed on February 11, 2014.

21 COUNT THREE

22 OCTC Case No. 18-O-15134
23 Business and Professions Code section 6103
24 [Failure to Comply with Court Orders]

25 4. Respondent disobeyed or violated an order or orders of the court requiring respondent
26 to do or forbear an act connected with or in the course of respondent's profession which
27 respondent ought in good faith to do or forbear, in *Jerry Littleton v. Pacific Gas & Electric*
28 *Company et al.*, Eastern District of California, case no. 2:12-cv-02236, as follows:

- 1 A. Failing to comply with the August 28, 2012 Order Setting Status (Pretrial Scheduling)
2 Conference, which required respondent (concurrently with the service of process or as
3 soon as possible thereafter) to serve upon each of the parties a copy of the order, and
4 to file with the clerk of the court a certificate reflecting such service; to confer and
5 develop a discovery plan at least twenty-one calendar days before the scheduling
6 conference; to file a joint status report with the court not later than fourteen days prior
7 to the scheduling conference; and to file opposition papers in accordance with Local
8 Rule 230(c);
- 9 B. Failing to comply with the April 11, 2013 Order which required respondent to file
10 briefing in accordance with Local Rule 230, which required respondent to file an
11 opposition or non-opposition not less than fourteen days preceding the noticed (or
12 continued) hearing date;
- 13 C. Failing to comply with the June 28, 2013 Order which required respondent to show
14 cause in writing within ten days as to why certain defendants should not be dismissed
15 with prejudice;
- 16 D. Failing to comply with the September 30, 2013 Order which required plaintiff to
17 show cause in writing within ten days as to why defendant South Feather Water and
18 Power Agency's Motion for Partial Judgment should not be granted;
- 19 E. Failing to comply with the October 16, 2013 Order which required respondent to
20 show cause in writing within ten days as to why he should not be fined \$500 for
21 failing to respond to the September 30, 2013 Order;
- 22 F. Failing to comply with the December 17, 2013 Order which required respondent to
23 file a joint status report within 30 days; and
- 24 G. Failing to comply with the January 17, 2014 Order which required respondent to
25 show cause in writing within ten days as to why he should not be fined \$500 for
26 failing to comply with the court's December 17, 2013 Order.
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COUNT FOUR

OCTC Case No. 18-O-15134
Rules of Professional Conduct, former rule 3-110(A)
[Failure to Perform Competently]

5. On or about December 1, 2015, Victoria Littleton retained respondent to perform legal services, namely to represent her and the estate of her late father, Jerry Littleton, in a lawsuit, *Jerry Littleton v. South Feather Water and Power Agency et al.*, Butte County Superior Court, case no. 165489, in which respondent intentionally, recklessly, or repeatedly failed to perform with competence, in willful violation of the Former Rules of Professional Conduct, rule 3-110(A), as follows:

- A. By bringing suit in the name of Jerry Littleton, a deceased person;
- B. By failing to bring the suit in the name of Jerry Littleton’s estate, heirs, or successors in interest;
- C. By failing to serve defendants with the Complaint or the First Amended Complaint;
- D. By failing to appear at a status conference on or about August 26, 2016;
- E. By failing to meet and confer with defendants in connection with their Demurrer;
- F. By failing to file an opposition to defendant’s Demurrer and Motion to Strike Portions of the First Amended Complaint;
- G. By failing to obtain leave of court to file a Second Amended Complaint; and
- H. By failing to perfect an appeal of the final judgment.

COUNT FIVE

OCTC Case No. 18-O-15134
Rules of Professional Conduct, former rule 3-110(A)
[Failure to Perform Competently]

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COUNT SEVEN

OCTC Case No. 18-O-15134
Business and Professions Code section 6068(m)
[Failure to Communicate Significant Development]

9. On or about December 1, 2015, Victoria Littleton retained respondent to perform legal services, namely to represent her and the estate of her late father, Jerry Littleton, in a lawsuit, *Jerry Littleton v. South Feather Water and Power Agency et al.*, Butte County Superior Court, case no. 165489.

10. On or about March 9, 2018, and thereafter, respondent failed to keep Ms. Littleton, reasonably informed of significant developments regarding the appeal of *Jerry Littleton v. South Feather Water and Power Agency et al.*, Third Appellate District, case no C085702, in willful violation of section 6068(m) of the Business and Professions Code, by failing to inform his client that the appeal had been finally dismissed.

COUNT EIGHT

OCTC Case No. 18-O-15134
Rules of Professional Conduct, former rule 4-100(A)
[Failure to Deposit Client Funds Into A Client Trust Account]

11. On or about November 2, 2017 respondent received from his client, Victoria Littleton, in connection with the appeal of *Jerry Littleton v. South Feather Water and Power Agency et al.*, Third Appellate District, case no C085702, and the appeal of *Littleton et al. v. South Feather Water and Power Agency et al.*, Third Appellate District, case no C085740, \$1,550 in advanced costs for filing fees.

12. On or about November 2, 2017, Respondent caused the \$1,550 to be deposited into his personal bank account, Bank of America account number 32506064XXXX, that was not

1 labeled as “Trust Account,” “Client’s Funds Account,” or with words of similar import, in
2 willful violation of the Rules of Professional Conduct, former rule 4-100(A).

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7 COUNT NINE

8 OCTC Case No. 18-O-15134
9 Rules of Professional Conduct, former rule 1-311(D)
[Employment of Disbarred, Suspended, Resigned, or Involuntarily Inactive Member]

10 13. Respondent failed to serve upon the State Bar from on or about September 28, 2012
11 to on or about November 8, 2012, notice of his employment of John Edmund Wolfgram,
12 Member No. 78966, who was then an involuntarily inactive member of the State Bar, in willful
13 violation of the Rules of Professional Conduct, former rule 1-311(D).

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15 COUNT TEN

16 OCTC Case No. 18-O-15134
17 Rules of Professional Conduct, former rule 1-311(D)
[Employment of Disbarred, Suspended, Resigned, or Involuntarily Inactive Member]

18 14. Respondent failed to serve upon the State Bar from on or about August 14, 2015 to on
19 or about March 26, 2018 notice of his employment of respondent employed Thomas J. Dixon,
20 Member No. 146405, who was then a disbarred member of the State Bar, in willful violation of
21 the Rules of Professional Conduct, former rule 1-311(D).

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23 COUNT ELEVEN

24 OCTC Case No. 18-O-15134
25 Business and Professions Code section 6068(o)(6)
[Failure to Report Imposition of Professional Discipline]

26 15. On or about January 15, 1968, the Medical Board of California (the “Board”) issued
27 Physician’s and Surgeon’s Certificate No. C 29816 to respondent.

1 16. On or about December 27, 2013, the Board filed a disciplinary action entitled “*In the*
2 *Matter of the Accusation against Allen C. Hassan, M.D.*” Case Number 02-2011-218969, against
3 respondent alleging fourteen causes for discipline.

4 17. On or about January 15, 2015, in a Decision and Order effective February 12, 2015,
5 the Board adopted a Stipulated Settlement and Disciplinary Order. In its Decision and Order, the
6 board revoked respondent’s Physician’s and Surgeon’s Certificate, but stayed revocation and
7 placed respondent’s certificate on probation for five years on certain terms and conditions of
8 probation that included Probation Conditions 4 and 7 relating to requirements that respondent
9 successfully complete the Physician Assessment and Clinical Education (PACE) program and
10 provide a certification of completion of the prescribing practices course.

11 18. On or about November 17, 2016, Judge Nye-Perkins found by a preponderance of the
12 evidence that respondent failed to comply with Probation Condition 4 and Probation Condition 7
13 of the Board’s Decision and Order. The Board found that respondent failed to successfully
14 complete the PACE program and failed to provide a certification of completion of the
15 prescribing practices course. Judge Nye-Perkins found that each of these violations constituted a
16 separate cause for discipline. Judge Nye-Perkins issued a Proposed Decision and Order vacating
17 the stay revocation and imposing a revocation of respondent’s certificate.

18 19. On or about November 17, 2016, the Board adopted the Proposed Decision and Order
19 as its own Decision and Order.

20 20. The Order became effective at 5:00 pm on December 16, 2016.

21 21. Respondent failed to report the January 15, 2015 Decision and Order, which was the
22 imposition of discipline against respondent by a professional or occupational disciplinary or
23 licensing board, in willful violation of Business and Professions Code section 6068(o)(6).

24 22. Respondent failed to report the November 17, 2016 Decision and Order, which was
25 the imposition of discipline against respondent by a professional or occupational disciplinary or
26 licensing board, in willful violation of Business and Professions Code section 6068(o)(6).

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COUNT TWELVE

OCTC Case No. 18-O-15134
Business and Professions Code section 6068(k)
[Failure to Comply with Conditions of Discipline]

23. On or about January 20, 2016, respondent was disciplined in case number S230653, State Bar Case No. 13-O-13004, with an effective date of February 19, 2016.

24. Conditions attached to respondent's disciplinary probation in State Bar Case No. 13-O-13004 include the requirement to comply with all provisions of the State Bar Act and Rules of Professional Conduct.

25. Respondent willfully violated Business and Professions Code section 6068(k), by failing to comply with conditions attached to Respondent's disciplinary probation by failing to comply with all provisions of the State Bar Act and Rules of Professional Conduct, as follows:

A. Respondent failed to serve upon the State Bar from on or about August 14, 2015 to on or about March 26, 2018 notice of his employment of respondent employed Thomas J. Dixon, Member No. 146405, who was then a disbarred member of the State Bar, in willful violation of the Rules of Professional Conduct, former rule 1-311(D).

B. On or about November 17, 2016, the Medical Board of California issued its Decision and Order, which revoked respondent's Physician and Surgeon's Certificate, effective 5:00 pm on December 16, 2016. Respondent failed to report the November 17, 2016 Decision and Order, which was the imposition of discipline against respondent by a professional or occupational disciplinary or licensing board, in willful violation of Business and Professions Code section 6068(o)(6).

C. On or about November 2, 2017 respondent received from his client, Victoria Littleton, in connection with the appeal of *Jerry Littleton v. South Feather Water and Power Agency et al.*, Third Appellate District, case no C085702, and the appeal of *Littleton et al. v. South Feather Water and Power Agency et al.*, Third Appellate District, case no. C085740, \$1,550 in advanced costs for filing fees. On or about November 2, 2017, Respondent caused the \$1,550 to be deposited into his personal

1 bank account, Bank of America account number 32506064XXXX, that was not
2 labeled as “Trust Account,” “Client’s Funds Account,” or with words of similar
3 import, in willful violation of the Rules of Professional Conduct, former rule 4-
4 100(A).

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6 COUNT THIRTEEN

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8 OCTC Case No. 18-O-15134
9 Business and Professions Code section 6106
[Moral Turpitude - Misrepresentation]

10 26. On or about April 14, 2016; May 26, 2016; July 8, 2016; October 5, 2016; January
11 19, 2017; April 3, 2017; July 7, 2017; October 10, 2017; November 9, 2017; and March 1, 2017,
12 respondent filed quarterly reports with the Office of Probation.

13 27. On each form, respondent swore, under penalty of perjury, that during the compliance
14 period in question, he was in compliance with the State Bar Act and Rules of Professional
15 Conduct.

16 28. In fact, respondent was violation of the State Bar Act and the Rules of Professional
17 Conduct as follows:

18 A. Respondent failed to serve upon the State Bar from on or about August 14, 2015 to on
19 or about March 26, 2018 notice of his employment of respondent employed Thomas
20 J. Dixon, Member No. 146405, who was then a disbarred member of the State Bar, in
21 willful violation of the Rules of Professional Conduct, former rule 1-311(D).

22 B. On or about November 17, 2016, the Medical Board of California issued its Decision
23 and Order, which revoked respondent’s Physician’s and Surgeon’s Certificate,
24 effective 5:00 pm on December 16, 2016. Respondent failed to report the November
25 17, 2016 Decision and Order, which was the imposition of discipline against
26 respondent by a professional or occupational disciplinary or licensing board, in
27 willful violation of Business and Professions Code section 6068(o)(6).

1 C. On or about November 2, 2017, respondent received from his client, Victoria
2 Littleton, in connection with the appeal of *Jerry Littleton v. South Feather Water and*
3 *Power Agency et al.*, Third Appellate District, case no. C085702, and the appeal of
4 *Littleton et al. v. South Feather Water and Power Agency et al.*, Third Appellate
5 District, case no. C085740, \$1,550 in advanced costs for filing fees. On or about
6 November 2, 2017, Respondent caused the \$1,550 to be deposited into his personal
7 bank account, Bank of America account number 32506064XXXX, that was not
8 labeled as “Trust Account,” “Client’s Funds Account,” or with words of similar
9 import, in willful violation of the Rules of Professional Conduct, former rule 4-
10 100(A).

11 29. Respondent knew that he was not in compliance with the State Bar Act or Rules of
12 Professional Responsibility when he submitted each quarterly report to the Office of Probation.
13 Respondent thereby committed an act involving moral turpitude, dishonesty, or corruption in
14 willful violation of Business and Professions Code section 6106.

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

21 COUNT FOURTEEN

22 OCTC Case No. 19-O-15428
23 Rules of Professional Conduct, former rule 3-110(A)
24 [Failure to Perform with Competence]

25 31. On or about September 3, 2017, Marcos Jiminez retained respondent to perform legal
26 services, namely to represent him in *Marcos Jiminez v. Patrick J. Keenan, et al.*, Placer County
27 Superior Court, case no. SCV-003833, in which respondent intentionally, recklessly, or

1 repeatedly failed to perform with competence, in willful violation of the Rules of Professional
2 Conduct, former rule 3-110(A), as follows:

- 3 A. Failing to file a substitution of attorney form;
- 4 B. Failing to participate in mediation, as ordered by the court on or about January 26,
5 2018;
- 6 C. Failing to respond to an Order to Show Cause issued by the court on or about April 4,
7 2018; and
- 8 D. Failing to take action after the court dismissed the case on or about May 1, 2018.

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10 COUNT FIFTEEN

11 OCTC Case No. 19-O-15428
12 Rules of Professional Conduct, former rule 3-110(A)
13 [Failure to Perform with Competence]

14 32. On or about September 3, 2017, and continuing through March 4, 2019, Marcos
15 Jiminez retained respondent to perform legal services, namely to handle a child visitation matter,
16 in which respondent intentionally, recklessly, or repeatedly failed to perform with competence,
17 in willful violation of the Rules of Professional Conduct, former rule 3-110(A), by delaying any
18 action in furtherance of his client's goals and failing to provide work of any value.

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20 COUNT SIXTEEN

21 OCTC Case No. 19-O-15428
22 Business and Professions Code section 6068(m)
23 [Failure to Communicate Significant Development]

24 33. On or about May 1, 2018, and thereafter, respondent failed to keep his client, Marcos
25 Jiminez, reasonably informed about significant developments regarding *Marcos Jiminez v.*
26 *Patrick J. Keenan, et al.*, Placer County Superior Court, case no. SCV-003833, in willful
27 violation of Business and Professions code section 6068(m), by failing to inform his client that

- 28 A. Respondent failed to file a substitution of attorney form as counsel for Mr. Jiminez;

- 1 B. On October 3, 2017, the court ordered the parties to meet and confer to choose a
2 mediator;
3 C. On January 26, 2017, the court ordered the parties to participate in mediation;
4 D. The court issued an April 4, 2018 Order to Show Cause Re: Dismissal; and
5 E. On or about May 1, 2018, the court dismissed the case.
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8 COUNT SEVENTEEN

9 OCTC Case No. 19-O-15428
10 Business and Professions Code section 6103
11 [Failure to Comply with Court Orders]

12 34. Respondent disobeyed or violated an order or orders of the court requiring respondent
13 to do or forbear an act connected with or in the course of respondent's profession which
14 respondent ought in good faith to do or forbear, in *Marcos Jiminez v. Patrick J. Keenan, et al.*,
15 Placer County Superior Court, case no. SCV-003833, as follows:

- 16 A. Failing to comply with the October 3, 2017 Order requiring Respondent to meet and
17 confer with opposing counsel to choose a mediator;
18 B. Failing to comply with the January 26, 2018 Order requiring Respondent to
19 participate in mediation and attempt to settle the case; and
20 C. Failing to comply with the April 4, 2018 Order to Show Cause Re: Dismissal.

21 COUNT EIGHTEEN

22 OCTC Case No. 19-O-15428
23 Rules of Professional Conduct, rule 1.16(e)
24 [Failure to Refund Unearned Fees]

25 35. On or about September 4, 2017, Marcos Jiminez paid respondent \$6,500 to perform
26 legal services, namely to represent him in *Marcos Jiminez v. Patrick J. Keenan, et al.*, Placer
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1 County Superior Court, case no. SCV-003833, and in a child visitation matter, in connection
2 with both of which respondent failed to perform work of any value.

3 36. On or about March 20, 2019, Mr. Jiminez requested a full refund.

4 37. On or about March 26, 2019 Respondent agreed to provide a full refund.

5 38. Respondent failed to provide a full or partial refund, in willful violation of the Rules
6 of Professional Conduct, rule 1.16.(e).

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10 **NOTICE - INACTIVE ENROLLMENT!**

11 **YOU ARE HEREBY FURTHER NOTIFIED THAT IF THE STATE BAR
12 COURT FINDS, PURSUANT TO BUSINESS AND PROFESSIONS CODE
13 SECTION 6007(c), THAT YOUR CONDUCT POSES A SUBSTANTIAL
14 THREAT OF HARM TO THE INTERESTS OF YOUR CLIENTS OR TO
15 THE PUBLIC, YOU MAY BE INVOLUNTARILY ENROLLED AS AN
16 INACTIVE MEMBER OF THE STATE BAR. YOUR INACTIVE
17 ENROLLMENT WOULD BE IN ADDITION TO ANY DISCIPLINE
18 RECOMMENDED BY THE COURT.**

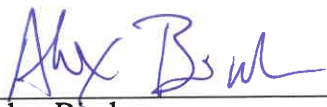
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20 **NOTICE - COST ASSESSMENT!**

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

26 Respectfully submitted,

27 THE STATE BAR OF CALIFORNIA
28 OFFICE OF CHIEF TRIAL COUNSEL

29 DATED: January 2, 2020

30 By: 
31 Alex Binder
32 Deputy Trial Counsel

DECLARATION OF SERVICE BY FIRST CLASS MAIL AND CERTIFIED MAIL

CASE NUMBER: (OCTC Case No. 18-O-15134; 19-O-15428)

I, the undersigned, over the age of eighteen (18) years, whose business address and place of employment is the State Bar of California, 180 Howard Street, San Francisco, California, declare that I am not a party to the within action; that I am readily familiar with the State Bar of California's practice for collection and processing of correspondence for mailing with the United States Postal Service; that in the ordinary course of the State Bar of California's practice, correspondence collected and processed by the State Bar of California would be deposited with the United States Postal Service that same day; that I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date on the envelope or package is more than one day after date of deposit for mailing contained in the affidavit; and that in accordance with the practice of the State Bar of California for collection and processing of mail, I deposited or placed for collection and mailing in the City and County of San Francisco, on the date shown below, a true copy of the within

NOTICE OF DISCIPLINARY CHARGES

in a sealed envelope placed for collection and as first class mailing and as certified mail, return receipt requested at 180 Howard Street, San Francisco, California, on the date shown below, addressed to:

Article No. 9414 7266 9904 2152 1814 96

Article No. 9414 7266 9904 2152 1815 02

**Allen Clarence Hassan
Allen Hassan Law Office
2929 El Camino Real
Sacramento, CA 95821-6012**

**Michael Emery Dietrick
Law Offices of Michael Dietrick
765 Baywood Dr Ste 227
Petaluma, CA 94954**


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

N/A

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

DATED: January 2, 2020

SIGNED: _____


Fanoia Uiagalelei
Declarant