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Respondent

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A THE PROPERTY AND ADDRESS OF THE PERSON NAMED IN	OFFICE OF THE PRESIDING DISCIPLINARY JUDGE SUPREME COURT OF ARIZONA	
ALL LANGUAGES PARTY	MAR 1 1 2013	
CINAMINATURATION STREET	BY	0

# BEFORE THE PRESIDING DISCIPLINARY JUDGE OF THE SUPREME COURT OF ARIZONA

IN THE MATTER OF A MEMBER OF THE STATE BAR OF ARIZONA,

Roberto Salazar, Bar No. 023444,

Respondent.

PDJ-2012-9109

# AGREEMENT FOR DISCIPLINE BY CONSENT

[State Bar No. 11-3886, 12-1301, 12-1935]

The State Bar of Arizona, through undersigned Bar Counsel, and Respondent Roberto Salazar, who has chosen not to seek the assistance of counsel, hereby submit their Tender of Admissions and Agreement for Discipline by Consent, pursuant to Rule 57(a), Ariz. R. Sup. Ct. Respondent voluntarily waives the right to an adjudicatory hearing on the complaint, unless otherwise ordered, and waives all motions, defenses, objections or requests which have been made or raised, or could be asserted thereafter, if the conditional admission and proposed form of discipline is approved.

Respondent conditionally admits that his conduct, as set forth below, violated Rule 42, ER(s) 1.1, 1.2(a), 1.3, 1.4, 1.5(b), 1.8(h), 1.16(d), 3.2, 3.4(c), and

8.4(d). Upon acceptance of this agreement, Respondent agrees to accept imposition of the following discipline: Reprimand with two years probation. The probation shall include participation in the Law Office Management Assistance Program (LOMAP) and the completion and payment of the following CLE courses in addition to the yearly requirement: (1) Nuts and Bolts of Civil Practice & Procedure (7 CLE hours); (2) Foundations of Immigration Law (2 CLE hours); (3) Fundamentals of Immigration Practice (4 CLE hours). Respondent also agrees to timely participate in fee arbitration with Complainant Ana Guadalupe Manzano-Vega relating to file no. 12-1935 and to pay any fee arbitration award that may be entered against him within thirty days of the date of the award. Respondent also agrees to pay the costs and expenses of the disciplinary proceeding.¹ The State Bar's Statement of Costs and Expenses is attached hereto as Exhibit "A."

#### **FACTS**

#### **GENERAL ALLEGATIONS**

1. At all times relevant, Respondent was a lawyer licensed to practice law in the state of Arizona having been first admitted to practice in Arizona on October 21, 2004.

# **COUNT ONE (State Bar File No. 11-3886)**

2. On December 7, 2011, the State Bar received a judicial referral letter concerning Respondent's representation of Graciela Quiroga ("Quiroga") in Pima County Superior Court case no. C20101094.

<sup>&</sup>lt;sup>1</sup> Respondent understands that the costs and expenses of the disciplinary proceeding include the costs and expenses of the State Bar of Arizona, the Disciplinary Clerk, the Probable Cause Committee, the Presiding Disciplinary Judge and the Supreme Court of Arizona.

- 3. Respondent filed the underlying case on February 11, 2010 on behalf of Quiroga.
- 4. Respondent's initial disclosure statement was due in April of 2010. Respondent, however, did not serve his initial disclosure statement until January 28, 2011.
- 5. On February 4, 2011, the defendants in the underlying case served discovery requests on Respondent.
- 6. On March 5 and March 21, 2011, Quiroga sent letters to the court requesting a hearing. The court scheduled a status conference for May 9, 2011.
  - 7. Respondent did not attend the status conference on May 9, 2011.
- 8. Quiroga attended the status conference and advised the court that she may not be represented by an attorney. The court scheduled another status conference for May 16, 2011.
- 9. Additionally, because Respondent did not attend the May 9, 2011 status conference, the court entered an order to show cause and scheduled a show cause hearing for July 11, 2011. The court ordered that Respondent show cause why he should not be sanctioned for his failure to appear at the status conference. The court scheduled another status conference for the same date.
- 10. Respondent and his co-counsel appeared at the May 16, 2011 status conference. During this status conference, Respondent's co-counsel informed the court that Quiroga may be reluctant to continue with Respondent as her counsel. Quiroga informed the court that Respondent needed to communicate with her more.

- 11. On June 20, 2011, the defendants filed a motion to compel and for sanctions relating to their February 2011 discovery requests. The court scheduled a hearing on this motion for the same day as the show cause hearing.
  - 12. Respondent did not file a response to the motion to compel.
- 13. On July 11, 2011, Respondent did not attend the status conference/show cause hearing/motion to compel hearing but sent another attorney to attend this hearing.
- 14. At the hearing, this other attorney could not address the motion to compel. The court granted the motion to compel and granted the defendants' counsel her fees in filing the motion to compel. On August 29, 2011, Respondent informed the court that he would "assume responsibility for the payment" of such fees.
- 15. Because Respondent did not attend the show cause hearing, the court adjourned it until September 12, 2011 and ordered Respondent to be personally present.
- 16. Respondent attended the September 12, 2011 show cause hearing. The court ordered Respondent to explain how he intended to remedy any future scheduling issues that would prevent him from appearing at required hearings.
- 17. On September 16, 2011, the defendants filed a motion for summary judgment.
- 18. Respondent did not file a response to the motion for summary judgment and did not discuss the motion for summary judgment with Quiroga.

- 19. On November 1, 2011, because of Respondent's failure to oppose their motion for summary judgment, the defendants filed a request for a ruling on their motion for summary judgment. Respondent did not file a response to this request.
- 20. On November 21, 2011, the court heard argument on the motion for summary judgment. Although Respondent appeared for the hearing, the court granted the motion because Respondent failed to present to the court any genuine issues of material fact.
- 21. During Respondent's representation of Quiroga, there was a period of time in which Respondent did not communicate with Quiroga, Respondent failed to return Quiroga's calls, and Quiroga had to contact the court directly regarding the status of her case.

## **COUNT TWO (State Bar File No. 12-1301)**

- 22. Martha Villela ("Villela") retained Respondent in February of 2011 to file a family petition on behalf of her and her children with the U.S. Citizenship and Immigration Services ("USCIS"). Villela's husband is a U.S. citizen and Respondent agreed to petition for Villela and her two children to reside in the U.S. with her husband.
- 23. Respondent also agreed to submit an employment authorization application (form I-765) to the USCIS on behalf of Villela.
- 24. Villela and Respondent executed a flat fee agreement pursuant to which Villela paid Respondent \$6,000.00.
- 25. Villela provided Respondent certain original documents including photographs, birth certificates, and medical examinations for herself and her children.

- 26. On May 24, 2011, Respondent sent a letter to the USCIS forwarding forms I-130 (petition for alien relative) and I-485 (application to register permanent resident or adjust status).
- 27. Respondent did not submit an employment authorization application for Villela.
- 28. On August 1, 2011, Respondent apparently resent the I-485 and I-130 forms to the USCIS. Specifically, on August 17, 2011, the USCIS sent receipts to Respondent stating the USCIS received the petition on August 1, 2011 and that they are in "process."
- 29. On October 28, 2011 and November 8, 2011, the USCIS sent Villela and her husband similar notices.
  - 30. Villela travelled to Mexico in September of 2011.
- 31. Respondent did not advise Villela that she should not travel to Mexico while her I-485 application was pending with the USCIS.
- 32. In December of 2011, Villela had an interview with the USCIS. Respondent failed to attend this interview with Villela.
- 33. At the interview, the USCIS asked Villela for documentation that she did not have, including the medical examinations, because Respondent had this documentation.
- 34. On December 15, 2011, the USCIS sent a letter to Villela stating that her I-485 application was denied because "[t]he record indicates that after you filed the application you departed from the United States on September 5, 2011, without first having been issued advanced parole. . . ."

- 35. In January of 2012, Respondent again prepared a form I-485 for Villella and a Form I-130 for Villela's husband but did not complete an employment authorization for Villela.
- 36. In April of 2012, the USCIS notified Villela that the I-485 and I-130 forms were again incomplete. Respondent informed Villela that he sent an incorrect check with the forms.
- 37. Villela did not believe that Respondent would correctly submit the forms. Accordingly, in April of 2012, Villela met with Respondent and requested that he return the original documents that she provided to him so that she could submit them to the USCIS.
  - 38. Respondent did not return these documents to Villela.
- 39. During this meeting, Respondent provided Villela with a refund check of \$6,000.00 written from his operating account. When he provided Villela the check, he informed her that she no longer had representation.
- 40. Villela attempted to cash the check and, on April 25, 2012, Villela's bank informed her that it was returning the check for nonsufficient funds. Villela's bank charged her a \$25.00 fee.
- 41. In May of 2012, Villela confronted Respondent regarding the bounced check. Respondent informed her that he would pay her but that he would have to do so in installments.
  - 42. On May 4, 2012, Respondent provided Villela a check for \$3,000.00.
- 43. Villela attempted to cash the \$3,000.00 check but her bank informed her that Respondent's account did not have sufficient funds.

- 44. On May 21, 2012, and after Villela contacted a department within Pima County that addresses bad checks, Respondent provided Villela the amount of \$6,025.00 in cash in exchange for Villela executing a release.
- 45. Respondent did not advise Villela in writing before she signed the release of the appropriateness of obtaining independent representation relating to the release.
- 46. During Respondent's representation of Villela, Respondent failed to communicate with Villela, did not provide Villela updates about the status of her matter even when she asked for such updates, and failed to return her calls. Additionally, Respondent did not return to her the original documents that she provided to Respondent, including the photographs and birth certificates.

## **COUNT THREE (State Bar File No. 12-1935)**

- 47. Ana Guadalupe Manzano-Vega ("Vega") was arrested and detained by United States Immigration and Customs Enforcement ("ICE") when she stayed in the United States after her tourist visa expired.
  - 48. Vega is from Mexico but has resided in the United States since 2000.
- 49. On May 2, 2011, Vega and Respondent executed a flat fee agreement for \$1,500.00 for Respondent to represent her at a bond hearing.
- 50. On May 3, 2011, Respondent submitted his notice of entry of appearance before the immigration court.
- 51. On May 4, 2011, Respondent assisted Vega in posting a \$3,000.00 bond and ICE released Vega from its custody. ICE informed Vega that she had been released pending a final decision in her exclusion/deportation/removal hearing.

- 52. On May 11, 2011, Vega and Respondent entered a second flat fee agreement for the purposes of representing Vega in the immigration court. The agreement provides for a flat fee of \$4,500.00 as the entire fee for the representation.
  - 53. Vega confirmed with Respondent that the flat fee includes costs.
- 54. Respondent agreed to complete and submit to the USCIS an application to adjust status for Vega and an employment authorization, agreed to represent Vega in the removal proceedings, and agreed to file a cancellation of the removal and to adjust status in the removal proceedings.
- 55. On June 10, 2011, Respondent forwarded to the USCIS certain forms, including an I-130 form (petition for alien relative), an I-765 form (application for employment authorization), an I-485 form (application to register permanent residence or adjust status), and a G-28 form (notice of appearance).
- 56. The instructions for form I-485 provide a list of who is not eligible to adjust status and include in this list if "[y]our authorized stay expired before you filed this application."
- 57. Vega and her daughter worked with Respondent's assistant in completing the forms.
  - 58. Respondent reviewed the forms before sending them to the USCIS.
- 59. Despite informing Vega that the flat fee included costs, Vega paid for the submission of these forms to the USCIS in the amount of \$1,070.00.
- 60. The I-130 and I-485 forms that Respondent submitted to the USCIS for Vega indicate that Vega is not in removal proceedings.
  - 61. This is incorrect as Vega was in removal proceedings.

- 62. On July 18, 2011, the immigration court notified Respondent that Vega's hearing date for her removal proceedings was scheduled for December 8, 2011.
- 63. On July 30, 2011, the USCIS sent Vega a notice of decision denying her I-485 application because she was in removal proceedings and 8 C.F.R. § 1245.2 provides that the immigration judge has exclusive jurisdiction to adjudicate any application for adjustment of status that an alien may file when an alien has been placed in removal or deportation proceedings. The USCIS further informed Vega that any pending ancillary application for employment authorization related to her I-485 form was also denied.
- 64. In September of 2011, Respondent purportedly submitted a pleading to the immigration court conceding the charges of removability but stating that Vega will be applying to the immigration court for cancellation of removal and adjustment of status.
- 65. Respondent did not file an application for cancellation of removal and adjustment of status with the immigration court.
- 66. On December 8, 2011, the immigration court provided Respondent a notice of hearing relating to Vega's removal proceedings for May 31, 2012.
- 67. In April of 2012, Respondent's office was closed for a month, no one was at the office, and an answering machine answered all phone calls.
- 68. On May 8, 2012, the immigration court provided Respondent a notice of hearing relating to Vega's removal proceedings for December 27, 2012.

- 69. In May of 2012, at Respondent's request, Vega provided Respondent \$380.00 so Respondent could submit a second employment authorization application to the USCIS on her behalf.
- 70. A few weeks later, Respondent again called Vega and requested \$985.00 to file another I-485 application and \$85.00 for finger prints. Vega informed Respondent that she could not pay these amounts.
- 71. From approximately May to June of 2012, Vega left messages for Respondent but Respondent did not return her phone calls. Vega had no communications with Respondent after approximately June 2012 until approximately September of 2012.
- 72. On June 5, 2012, Respondent again forwarded to the USCIS an employment authorization application with a check for \$380.00 and a notice of entry of appearance form.
- 73. Respondent incorrectly completed the employment authorization application, listing the incorrect eligibility category in question 16 of the application.
- 74. In June of 2012, Vega terminated Respondent and requested her file. Respondent informed Vega that he would call her on the following Tuesday so that Vega could sign papers relating to Respondent's withdrawal.
- 75. Respondent never called Vega and Respondent did not provide Vega access to her file until approximately three months later.
- 76. Additionally, Respondent did not file a motion to withdraw with the immigration court or a notice of withdrawal with the USCIS until October of 2012.
- 77. On July 10, 2012, the USCIS informed Respondent that it was unable to process the June 5, 2012 employment authorization application because

Respondent listed the incorrect eligibility category and the eligibility category that Respondent designated required further information. The USCIS requested this further documentation by October 5, 2012.

- 78. Respondent did not inform Vega of the July 10, 2012 correspondence from the USCIS.
- 79. On August 13, 2012, Vega contacted the USCIS because she had not heard from Respondent. The USCIS informed Vega of the July 10, 2012 correspondence and that it sought further information by October 5, 2012.
- 80. Vega attempted to communicate with Respondent regarding the outstanding documentation but Respondent failed to return any of Vega's messages. Respondent also failed to provide the USCIS the further information it requested relating to Vega's employment authorization application.

#### CONDITIONAL ADMISSIONS

Respondent's admissions are being tendered in exchange for the form of discipline stated below and is submitted freely and voluntarily and not as a result of coercion or intimidation.

Respondent conditionally admits that his conduct violated Rule 42, Ariz. R. Sup. Ct., specifically ERs 1.1, 1.2(a), 1.3, 1.4, 1.5(b), 1.8(h), 1.16(d), 3.2, 3.4(c), and 8.4(d).

#### CONDITIONAL DISMISSALS

The State Bar has conditionally agreed to dismiss the allegation that Respondent's conduct violated ER 8.4(c).

#### RESTITUTION

Restitution is not an issue in this matter.

#### **SANCTION**

Respondent and the State Bar of Arizona agree that based on the facts and circumstances of this matter, as set forth above, the following sanction is appropriate: Reprimand, followed by two years probation to include LOMAP and during which Respondent is required to complete and pay for the following CLE: (1) Nuts and Bolts of Civil Practice & Procedure (7 CLE hours); (2) Foundations of Immigration Law (2 CLE hours); (3) Fundamentals of Immigration Practice (4 CLE hours). Respondent shall provide Bar Counsel with evidence of completion by providing copies of handwritten notes. These hours are to be completed in addition to Respondent's annual CLE requirement. Respondent shall be responsible for the cost of the aforementioned CLE. As part of the probation, Respondent also agrees to timely participate in fee arbitration with Complainant Ana Guadalupe Manzano-Vega relating to file no. 12-1935 and to pay any fee arbitration award that may be entered against him within thirty days of the date of the award.<sup>2</sup>

#### **LOMAP**

Respondent shall contact the director of the State Bar's Law Office Management Assistance Program (LOMAP), at 602-340-7332, within 30 days of the date of the final judgment and order. Respondent shall submit to a LOMAP examination of his office's procedures, including, but not limited to, compliance with ERs 1.3 and 1.4. The director of LOMAP shall develop "Terms and Conditions of Probation", and those terms shall be incorporated herein by reference. The probation period will commence at the time of the entry of the judgment and order and will conclude two years from that date. Respondent shall be responsible for any costs associated with LOMAP.

<sup>&</sup>lt;sup>2</sup> Respondent and Complainant Ana Guadalupe Manzano-Vega have already agreed to fee arbitration and are currently awaiting the appointment of a fee arbitrator.

#### **NON-COMPLIANCE**

In the event that Respondent fails to comply with any of the foregoing probation terms, and information thereof is received by the State Bar of Arizona, Bar Counsel shall file a notice of noncompliance with the Presiding Disciplinary Judge, pursuant to Rule 60(a)(5), Ariz. R. Sup. Ct. The Presiding Disciplinary Judge may conduct a hearing within 30 days to determine whether a term of probation has been breached and, if so, to recommend an appropriate sanction. If there is an allegation that Respondent failed to comply with any of the foregoing terms, the burden of proof shall be on the State Bar of Arizona to prove noncompliance by a preponderance of the evidence.

#### **LEGAL GROUNDS IN SUPPORT OF SANCTION**

In determining an appropriate sanction, the parties consulted the American Bar Association's *Standards for Imposing Lawyer Sanctions (Standards)* pursuant to Rule 57(a)(2)(E). The *Standards* are designed to promote consistency in the imposition of sanctions by identifying relevant factors that courts should consider and then applying those factors to situations where lawyers have engaged in various types of misconduct. *Standards* 1.3, Commentary. The *Standards* provide guidance with respect to an appropriate sanction in this matter. *In re Peasley*, 208 Ariz. 27, 33, 35, 90 P.3d 764, 770 (2004); *In re Rivkind*, 162 Ariz. 154, 157, 791 P.2d 1037, 1040 (1990).

In determining an appropriate sanction consideration is given to the duty violated, the lawyer's mental state, the actual or potential injury caused by the misconduct and the existence of aggravating and mitigating factors. *Peasley*, 208 Ariz. at 35, 90 P.3d at 772; *Standard* 3.0.

The parties agree that Standards 4.43 and 6.23 apply in this matter, given the facts and circumstances involved. Standard 4.43 provides that a reprimand is generally appropriate when a lawyer is negligent and does not act with reasonable diligence in representing a client, and causes injury or potential injury to a client. Standard 6.23 provides that a reprimand is generally appropriate when a lawyer negligently fails to comply with a court order or rule, and causes injury or potential injury to a client or other party, or causes interference or potential interference with a legal proceeding. Respondent failed to appear for hearings, failed to timely respond to discovery requests, and failed to file a response to a motion for summary judgment. Respondent further failed to properly complete certain immigration forms.

### The duty violated

As described above, Respondent's conduct violated his duty to his clients and the legal system.

## The lawyer's mental state

For purposes of this agreement the parties agree that Respondent negligently failed to appear for hearings, to timely respond to discovery requests, to file a response to a motion for summary judgment, and to complete certain immigration forms.

#### The extent of the actual or potential injury

For purposes of this agreement, the parties agree that there was actual harm to Respondent's clients and the legal system.

## Aggravating and mitigating circumstances

The presumptive sanction in this matter is reprimand. The parties conditionally agree that the following aggravating and mitigating factors should be considered.

## In aggravation:

Standard 9.22(c): A pattern of misconduct. This agreement resolves three counts of misconduct, involving similar charges.

Standard 9.22(d): Multiple offenses. The conduct involved in the three counts involves Respondent's representation in three separate matters.

## In mitigation:

Standard 9.32(a): Absence of a prior disciplinary record.

Standard 9.32(e): Full and free disclosure to disciplinary board or cooperative attitude toward proceedings.

#### Discussion

The parties have conditionally agreed that a greater or lesser sanction would not be appropriate under the facts and circumstances of this matter. This agreement was based on the following: Although Respondent failed to appear for two hearings, to timely respond to discovery requests, to file a response to a motion for summary judgment, and to properly complete certain immigration forms, it appears that the problem is one that can be addressed through education and LOMAP. Respondent, as a condition of his probation, will be required to attend CLE courses on civil practice and procedure and immigration practice and procedure. Based on the *Standards* and in light of the facts and circumstances of this matter, the parties conditionally agree that the sanction set forth above is within the range of the appropriate sanction and will serve the purposes of lawyer discipline.

#### CONCLUSION

The object of lawyer discipline is not to punish the lawyer, but to protect the public, the profession, and the administration of justice. *Peasley, supra* at ¶ 64, 90 P.3d at 778. Recognizing that determination of the appropriate sanction is the prerogative of the Presiding Disciplinary Judge, the State Bar and Respondent believe that the objectives of discipline will be met by the imposition of the proposed sanction of Reprimand, with two years probation to include LOMAP and completion of the following CLE courses in addition to the yearly requirement: (1) Nuts and Bolts of Civil Practice & Procedure (7 CLE hours); (2) Foundations of Immigration Law (2 CLE hours); (3) Fundamentals of Immigration Practice (4 CLE hours). Respondent also agrees to timely participate in fee arbitration with Complainant Ana Guadalupe Manzano-Vega relating to file no. 12-1935 and to pay any fee arbitration award that may be entered against him within thirty day sof the date of the award. Respondent also agrees to pay the costs and expenses of the disciplinary proceeding, and the imposition of costs and expenses. A proposed form

STATE BAR OF ARIZONA

Nicole S. Kaseta Staff Bar Counsel This agreement, with conditional admissions, is submitted freely and voluntarily and not under coercion or intimidation. I acknowledge my duty under the Rules of the Supreme Court with respect to discipline and reinstatement. I understand these duties may include notification of clients, return of property and other rules pertaining to suspension.

DATED this	day of		, 2013.
		Roberto S Responde	
Approved as to form and	content		
Mate Wessell Maret Vessella Chief Bar Counsel	'a		
Original filed with the Disor of the Office of the President this 14 day of 16	ling Disciplinar		
Copies of the foregoing n this 11th day of ML	nailed/ <u>emailed</u> arch, 2	013, to:	
Roberto Salazar Salazar Law Firm PLLC 1 E Congress Ste 165 Tucson, AZ 85701-1727 Email: Roberto@quelepa	so.com		

Respondent

This agreement, with conditional admissions, is submitted freely and voluntarily and not under coercion or intimidation. I acknowledge my duty under the Rules of the Supreme Court with respect to discipline and reinstatement. I understand these duties may include notification of clients, return of property and other rules pertaining to suspension.

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J. Hr

M	, 2013.
dge	
, to:	
	Roberto Sala Respondent

Copy of the foregoing <u>emailed</u> this <u>// Th</u> day of <u>Musch</u> , 2013, to:			
William J. O'Neil Presiding Disciplinary Judge Supreme Court of Arizona Email: officepdj@courts.az.gov Ihopkins@courts.az.gov			
Copy of the foregoing hand-delivered this _// ** day of **March** , 2013, to:			
Lawyer Regulation Records Manager State Bar of Arizona 4201 North 24 <sup>th</sup> Street, Suite 100 Phoenix, Arizona 85016-6266			
BV: Share C. Heller			

NSK:dch

Nicole S. Kaseta, Bar No. 025244 Staff Bar Counsel State Bar of Arizona 4201 N. 24<sup>th</sup> Street, Suite 100 Phoenix, Arizona 85016-6266 Telephone 602-340-7386

Email: LRO@staff.azbar.org

Roberto Salazar, Bar No. 023444 Respondent One East Congress, Suite 165 Tucson, Arizona 85701 Telephone (520) 792-9600 Email: Roberto@quelepaso.com

OFFICE OF THE PRESIDING DISCIPLINARY JUDGE SUPREME COURT OF ARIZONA APR 0 5 2013

### BEFORE THE PRESIDING DISCIPLINARY JUDGE

#### OF THE SUPREME COURT OF ARIZONA

## IN THE MATTER OF A MEMBER OF THE STATE BAR OF ARIZONA,

Roberto Salazar, Bar No. 023444,

Respondent.

PDJ-2012-9109

SUPPLEMENT TO AGREEMENT FOR DISCIPLINE BY CONSENT FILED ON MARCH 11, 2013

[State Bar No. 11-3886, 12-1301, 12-1935]

Pursuant to the Presiding Disciplinary Judge's March 20, 2013 Report and Order Regarding Agreement for Discipline, the State Bar of Arizona, by undersigned bar counsel, and Respondent Roberto Salazar submit this supplement to the Agreement for Discipline by Consent that they filed on March 11, 2013.

#### I. Supplemental Information Relating to Count One (File No. 11-3886/Quiroga)

## A. Factual Background

On February 11, 2010, Respondent filed a complaint on behalf of Ms. Ouiroga and against her homeowner's association ("HOA") alleging claims for breach of contract and bad faith. The complaint relates to an HOA bylaw stating that trailers older than ten years cannot be moved into the applicable trailer park community. Ms. Quiroga objected to this bylaw because she intended to purchase a trailer that was older than ten years but was allegedly prevented from doing so because of the bylaw. At the time that he filed the complaint, Respondent contends that he was a solo practitioner and had a high volume of work.

On February 2, 2011, the defendants served document production requests on Respondent. Respondent associated with another attorney, Adolfo Lara, around this time to assist him on Ms. Quiroga's case. (Exhibit 1). Respondent contends that he thought that Mr. Lara was working on the discovery responses. Mr. Lara was in fact corresponding with the defendants' counsel regarding the discovery responses. (Exhibit 2). Additionally, Respondent contends that they encountered difficulty in obtaining the requested documentation from Ms. Quiroga and that this delayed the responses.

On April 12, 2011, the court scheduled a status conference for May 9, 2011. Neither Respondent nor the defendants' attorney attended the status conference on May 9, 2011. (Exhibit 3). Accordingly, the court ordered that Respondent and defendants' attorney "show cause why they should not be sanctioned for failure to appear at the hearing this date . . . on July 11, 2011." (*Id.* at p. 2). Respondent contends that he missed the May 9, 2011 status conference because he had a hearing in federal court the same day. Respondent explained that he thought he would be able to appear for both hearings but, when he arrived for the status

<sup>&</sup>lt;sup>1</sup> Mr. Lara subsequently moved to withdraw and the court granted Mr. Lara's motion to withdraw on August 29, 2011.

conference in Superior Court after attending federal court, the court had already concluded the status conference. Respondent also contends that there may have been some confusion as to the time of the status conference because the defendants' counsel also appeared late and after the status conference concluded. (*Id.*).

On June 20, 2011, the defendants filed a motion to compel relating to document requests that they served in February of 2011. The court scheduled the hearing on the motion to compel as the same day as the July 11, 2011 show cause hearing. Respondent contends that he did not submit a response to the motion to compel because he did not calendar it correctly.

Respondent did not attend the show cause/motion to compel hearing scheduled for July 11, 2011. (Exhibit 4). Respondent contends that he did not attend the show cause hearing because he had another hearing that day. Respondent further contends that he never dealt with a show cause hearing before and did not realize that he had to personally attend the show cause hearing. Respondent sent another attorney to handle the show cause hearing, Carlos Medina. (*Id.*).<sup>2</sup> The court rescheduled the show cause hearing for September 12, 2011. (*Id.*)

On the same date, the court also granted the defendants' motion to compel and for sanctions relating to filing its motion to compel. (*Id.* at p. 2). On July 27, 2011, Respondent provided the outstanding discovery to the defendants. On August 2, 2011, the court entered a judgment for attorney fees relating to the

<sup>&</sup>lt;sup>2</sup> Respondent states that Mr. Lara did not attend this hearing because Mr. Lara was no longer assisting him with Ms. Quiroga's case by then.

motion to compel. (Exhibit 5). The judgment provides: "... it is Ordered that Defendants will have judgment against the Plaintiff and against her attorneys Roberto Salazar and Adolfo Lara, for their attorney fees incurred in connection with the Motion to Compel... in the sum of \$2,268.75..." (Id.).

On August 29, 2011, Respondent informed the court that he would assume responsibility for the payment of the attorney's fees incurred as a result of the motion to compel. Respondent did so and paid the attorney's fees related to the motion to compel on or about September 28, 2011. (Exhibit 6).

Respondent attended the rescheduled show cause hearing set for September 12, 2011. (Exhibit 7). The court ordered that Respondent submit a letter to it describing how he "intends to remedy any future scheduling issues that may prevent counsel from appearing at required hearings." (*Id.*). On September 21, 2011, Respondents complied with the court's order and submitted a memorandum to the court summarizing how he would prevent any future calendaring issues. (Exhibit 8).

On September 16, 2011, the defendants filed a motion for summary judgment. Respondent's failure to file a response to the motion for summary judgment appears to be related to Respondent's lack of knowledge regarding civil procedure. Specifically, Respondent asserts that he did not file a response to the defendants' motion for summary judgment because he believed that the facts standing alone were sufficient to warrant a denial of the motion. Respondent

contends that he took depositions<sup>3</sup> in this matter and believed that these depositions alone demonstrated that the case should be tried and not disposed of by motion. Respondent further contends that he attended the hearing on the motion for summary judgment and argued to the court that there were genuine issues of material fact. (Exhibit 9).

On November 28, 2011, Respondent sent Ms. Quiroga a letter confirming that she terminated his representation of her, that he already provided her portions of her file, and enclosed the remainder of her file. In this letter, Respondent further advised Ms. Quiroga that a judgment would be entered and that, if she chose to appeal it, she should file a notice of appeal no later than 30 days after the entry of the judgment. On the same date, Respondent filed a notice with the court stating that Ms. Quiroga terminated his representation of her.

On December 7, 2011, the defendants lodged a form of judgment, affidavit of attorneys fees, and verified statement of costs seeking attorney fees in the amount of \$23,360.00 and costs in the amount of \$2,284.12.

On January 11, 2012, the court entered a final judgment stating: "The Defendants' Motion for Summary Judgment is granted on all allegations and counts in the Plaintiff's Complaint. Pursuant to Rule 54(d), Arizona Rules of Civil Procedure, the entry of judgment in favor of the Defendants and against the Plaintiff adjudicates all of the issues in the Plaintiff's Complaint and, therefore, the Plaintiff's Complaint is dismissed with prejudice." (Exhibit 10 at pp. 1-2). The court awarded the defendants "the sum of \$7,500.00 as and for their attorney fees

<sup>&</sup>lt;sup>3</sup> Respondent deposed a former board member of the HOA and the president of the HOA. Additionally, the defendants deposed Ms. Quiroga.

incurred in this matter, together with Judgment for court costs in the sum of \$2,284.12." (Id. at p. 2).

On January 23, 2012, Ms. Quiroga filed a notice of appeal, in pro per. The court of appeals dismissed her appeal on July 3, 2012 after Ms. Quiroga failed to file her appellate brief despite receiving two extensions of time to file such brief.

#### **B. LOMAP and CLE**

Based upon the above, the State Bar believes that LOMAP may be helpful in assisting Respondent. Specifically, it appears that at least some of the issues that Respondent encountered in this file relate to calendaring, including calendaring relating to the motion to compel and calendaring reminders regarding the document production responses. LOMAP offers assistance in calendaring and docketing systems which may be helpful to Respondent. LOMAP may also be helpful in assisting Respondent with managing his practice in a more efficient manner, including for the reason that part of Respondent's issues appear to relate to Respondent's assertions that he has a high volume practice and is a solo practitioner. LOMAP may be able to recommend case management software that could assist Respondent in conducting his practice in a more organized fashion. LOMAP could also assist Respondent with any communication issues that he has with his client and opposing counsel. For example, Respondent stated that he delayed providing discovery responses because he had difficulty obtaining documents from his client. LOMAP could assist Respondent in developing strategies in dealing with clients who are either more difficult to deal with or not responsive enough.

Additionally, Respondent's conduct in this matter demonstrates unfamiliarity with civil procedure—i.e., Respondent contends that he did not know that he had to personally appear for a show cause hearing and Respondent thought it was sufficient to merely appear at a summary judgment hearing and not file a response. Because of this, the seven-hour CLE course titled "the Nuts and Bolts of Civil Procedure & Practice" would likely benefit Respondent.

## C. Respondent's Conduct Appears Negligent Rather than Intentional

Finally, based upon Respondent's explanations, it appears that Respondent's actions were negligent rather than intentional. The ABA Standards for Imposing Lawyer Sanctions ("Standards") define intentional conduct as "when the lawyer acts with the conscious objective or purpose to accomplish a particular result." Standards at p. 6. In contrast, the Standards define negligence as "when a lawyer fails to be aware of a substantial risk that circumstances exist or that a result will follow. . . ." Id. In the present case, Respondent explained that he did not intentionally fail to attend the May 9, 2011 status conference. Rather, he intended to appear for it but had another hearing in federal court the same day so he appeared late for the status conference and after it concluded. Respondent's failure to attend the show cause hearing also appears to be negligent as he did not intentionally disobey a court order by not attending this hearing. Respondent's ignorance of civil procedure led Respondent to mistakenly believe that he did not have to personally appear at the show cause hearing and he sent another attorney to attend this hearing. Regarding the failure to timely submit discovery responses, Respondent contends that he did not simply ignore the discovery. Instead, he believed that another attorney that he co-counseled with

was working on the responses and they were having issues obtaining the documents from Ms. Quiroga. Regarding not filing a response to a motion to compel, Respondent contends that he did not calendar this properly and that it was a mistake that he did not file a response to the motion to compel. Finally, regarding the motion for summary judgment, Respondent contends that he thought it was sufficient for him to appear at the hearing and argue that genuine issues of material fact existed. In short, it appears that Respondent's lack of knowledge regarding civil procedure contributed to his failure to respond to the motion for summary judgment—i.e., he failed to be aware of the substantial risk that the motion for summary judgment would be granted when he did not submit a written response.

## Supplemental Information Relating to Count II (File No. 12-1301/Villela)

While Respondent conditionally admitted that he did not return to Ms. Villela her documents, Respondent denied this assertion in the screening investigation and to the Attorney Discipline Probable Cause Committee ("ADPCC"). During the screening investigation, Respondent informed the State Bar that he returned to Complainant her original file, including the original photographs, birth certificates, and medical records.<sup>4</sup> Respondent contends that he did so around April of 2012 when he provided her the first check for \$6,000.00. Respondent could not produce any correspondence to the State Bar showing that he returned the original documents to Ms. Villella, but states that his assertion that he returned Ms. Villela's

<sup>&</sup>lt;sup>4</sup> During the screening investigation, Ms. Villela informed the State Bar that Respondent did not return her file. The State Bar recently contacted Ms. Villela to confirm that this was still her position but she failed to return the State Bar's call.

original documents is supported by the fact that he only has photocopies of these documents and not the originals. Additionally, Respondent represented to the ADPCC that he would testify that Respondent provided the file and documents to Ms. Villela.

Regarding the first check that Respondent wrote to Ms. Villela that was returned for non-sufficient funds, Respondent contends that Ms. Villela visited his office on or about April 16, 2012, raised her voice to Respondent in front of other clients, and was disrespectful to Respondent and his staff. Respondent contends that he was so upset by the situation that he wrote Ms. Villela a check right then but did not verify he had sufficient funds available to cover the check. Ms. Villella attempted to cash the check on or about April 25, 2012 but Respondent's account was short approximately \$500.00 and, therefore, the check did not clear. On or about May 4, 2012, Respondent wrote Ms. Villela a second check for \$3,000.00. Respondent contends that he did not know that he did not have sufficient money in his account at this point and thought he did have sufficient funds in his account at this point to cover the \$3,000.00 check.

The facts that led to the conclusion that Respondent's actions were negligent and not intentional include the following: (1) Respondent contends that he properly prepared and submitted the family petition on behalf of Ms. Villela and her two children in 2011. This is evidenced by the fact that the USCIS approved her children's petitions. (Exhibit 11). The USCIS denied Ms. Villela's petition, however, because Complainant left the country; (2) Respondent submitted another petition to adjust status to the USCIS on behalf of Ms. Villela in early 2012. However, Respondent states that he made a clerical error with these forms by submitting an

incorrect check amount with these forms. The USCIS informed him in April of 2012 regarding the same. Respondent contends that he could have corrected the mistake and continued with the petition but, around this time, Ms. Villela visited his office, was allegedly disrespectful to him and his staff, and Respondent terminated the relationship; (3) Regarding the interview, Respondent contends that the USCIS does not require his presence at the interview and that he informed Ms. Villela that he would not be attending the interview with her. Respondent contends that he normally does not attend these interviews with his clients, and he informs his clients of the same at the beginning of the representation; and (4) the fact that Respondent's account was only short approximately \$500.00 when he wrote the \$6,000.00 check supports Respondent's claim that he thought he would have sufficient funds to cover a \$3,000.00 check approximately ten days later. Respondent admits, however, that he should have actually checked his operating account and verified that he had sufficient funds.

# III. Supplemental Information Relating to Count III (File No. 12-1935/Vega)

Regarding the final outcome of this matter, Ms. Manzano-Vega's removal proceeding is still pending but the USCIS has granted her employment authorization application. Specifically, the immigration court scheduled a "master hearing"<sup>5</sup> for December 27, 2012. Ms. Manzano-Vega attended this hearing by herself and the court granted her a continuance until May 23, 2013 so that she

<sup>&</sup>lt;sup>5</sup> Respondent explained that master hearings are preliminary hearings, there are usually three or four master hearings, and then an individual hearing which is a hearing on the merits.

could obtain a new attorney. The May 23, 2013 hearing is also a "master hearing" and not an "individual hearing."

Regarding the employment authorization form that Respondent submitted, Ms. Manzano-Vega did not submit any further information to the USCIS by October 5, 2012, as requested by the USCIS. Instead, Ms. Manzano-Vega contacted the Mexican Consulate who paid for another attorney to assist her in again completing the employment authorization form and the application to adjust status form. Ms. Manzano-Vega's new attorney submitted a new employment authorization form for her in January of 2013. The USCIS informed her the week of March 18, 2013 that her employment authorization was granted.

The facts that support the conclusion that Respondent's actions were negligent rather than intentional include the following: (1) Respondent contends that the errors in the immigration paperwork that he submitted were negligent, clerical errors. He states that Ms. Manzano-Vega entered the United States with a valid visa and, therefore, he believed she was eligible to file for an adjustment of status. Respondent contends that the other errors in the I-130, I-465, and I-765 forms were typos; (2) Respondent did not miss any deadlines in the immigration court and Respondent contends that he intended to timely file the cancellation of removal application but that it was not due to the immigration court until after the immigration court scheduled an "individual hearing", which did not occur before he was terminated; (3) while Respondent conditionally admitted in the Agreement for Discipline by Consent that his office was closed for a month, Respondent contends that it was not actually closed for a month. Instead, he informed the State Bar that his receptionist quit during this time frame but that he was in his Tucson office.

Moreover, although Ms. Manzano-Vega alleged that Respondent's Tucson office was closed for a month, she also informed the State Bar that Respondent's Phoenix office "began fielding calls" during April of 2012; and (4) Respondent contends that he did not provide Complainant the July 10, 2012 USCIS correspondence and did not submit further information to the USCIS in response to that correspondence because Ms. Manzano-Vega terminated him and Respondent believed that she had retained new counsel based on Ms. Manzano-Vega's assertions that she intended to retain new counsel.

## IV. Proportionality

In the past, the Supreme Court has consulted similar cases in an attempt to assess the proportionality of the sanction recommended. *See In re Struthers*, 179 Ariz. 216, 226, 887 P.2d 789, 799 (1994). The Supreme Court has recognized that the concept or proportionality review is "an imperfect process." *In re Owens*, 182 Ariz. 121, 127, 893 P.3d 1284, 1290 (1995). This is because no two cases "are ever alike." *Id.* 

To have an effective system of professional sanctions, there must be internal consistency, and it is appropriate to examine sanctions imposed in cases that are factually similar. See In re Peasley, 208 Ariz. 27, 35, 90 P.3d 764, 772 (2004). However, the discipline in each case must be tailored to the individual case, as neither perfection nor absolute uniformity can be achieved. Id. at 208 Ariz. at ¶ 61, 90 P.3d at 778 (citing In re Alcorn, 202 Ariz. 62, 76, 41 P.3d 600, 614 (2002); In re Wines, 135 Ariz. 203, 207, 660 P.2d 454, 458 (1983)).

In *In Re Robinson*, SB-05-0014-D, Robinson was censured and placed on two years of probation. The probation included LOMAP. Robinson was not diligent in

representing one client and failed to adequately communicate with that client about significant matters. Robinson failed to act competently and diligently and failed to communicate with another client regarding child custody and support issues, resulting in adverse court orders that Robinson then failed to communicate to his client. Aggravating factors were: *Standards* 9.22(a) (prior disciplinary offenses), 9.22(d) (multiple offenses), and 9.22(i) (substantial experience in the practice of law). The mitigating factor was Standard 9.32(g) (character or reputation).

In *In Re Lacambra*, SB-08-0168-D, Lacambra was censured and placed on two years of probation. Lacambra failed to diligently pursue his client's case and failed to effectively communicate with his client. Lacambra represented his client in two matters. Lacambra failed to attend or inform his client of two show cause hearings and an enforcement hearing, which resulted in judgments being entered against his client, and failed to remove a lien that he placed on his client's home. Aggravating factors were: *Standards* 9.22(a) (prior disciplinary offenses), 9.22(e) (bad faith obstruction of the disciplinary proceeding by intentionally failing to comply with rules or orders of the disciplinary agency), and 9.22(i) (substantial experience in the practice of law). Mitigating factors were: Standards 9.32(b) (absence of a dishonest or selfish motive) and 9.32(l) (remorse).

In *In Re Finch*, SB-08-0066-D, Finch was censured and placed on 18 months of probation. The probation included LOMAP and fee arbitration. Finch represented his clients in immigration matters. He failed to ensure the timely filing of an appeal for the Ninth Circuit for one client. He also failed to timely file an application for cancellation of removal for another client, failed to inform the same client of a hearing date, and failed to inform the same client of the deadline for filing an

application for cancellation of removal. The aggravating factors were: Standards 9.22(a) (prior disciplinary offenses), 9.22(c) (a pattern of misconduct), 9.22(d) (multiple offenses), and 9.22(i) (substantial experience in the practice of law). The mitigating factors were: Standards 9.32(b) (absence of a dishonest or selfish motive), 9.32(d) (timely good faith effort to make restitution or to rectify consequences of misconduct), 9.32(e) (full and free disclosure to disciplinary board or cooperative attitude toward proceedings), and 9.32(I) (remorse).

In In Re Moffatt, SB-09-0089-D, Moffatt was censured and placed on year of probation. The probation included LOMAP and CLE. Respondent engaged in a pattern of client neglect. Respondent failed to diligently and competently represent his clients by filing numerous deficient pleadings in federal court. The aggravating factor was Standard 9.22(c) (a pattern of misconduct). The mitigating factors were Standards 9.32(a) (absence of a prior disciplinary record), 9.32(c) (personal or emotional problems), and 9.32(I) (remorse).

The above cases are similar to the instant case as they involve issues of competence, diligence, or communication. The above cases also involve multiple offenses or a pattern of misconduct.

**DATED** this 5<sup>th</sup> day of April 2013.

STATE BAR OF ARIZONA

Nicole S. Kaseta

Staff Bar Counsel

Roberto Salazar Respondent

application for cancellation of removal. The aggravating factors were: *Standards* 9.22(a) (prior disciplinary offenses), 9.22(c) (a pattern of misconduct), 9.22(d) (multiple offenses), and 9.22(i) (substantial experience in the practice of law). The mitigating factors were: *Standards* 9.32(b) (absence of a dishonest or selfish motive), 9.32(d) (timely good faith effort to make restitution or to rectify consequences of misconduct), 9.32(e) (full and free disclosure to disciplinary board or cooperative attitude toward proceedings), and 9.32(l) (remorse).

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The above cases are similar to the instant case as they involve issues of competence, diligence, or communication. The above cases also involve multiple offenses or a pattern of misconduct.

DATED this 5th day of April 2013.

STATE BAR OF ARIZONA

Nicole S. Kaseta Staff Bar Counsel

Roberto Salazar Respondent Original filed with the Disciplinary Clerk of the Office of the Presiding Disciplinary Judge of the Supreme Court of Arizona this 5th day of April, 2013.

Copies of the foregoing mailed/<u>emailed</u> this <u>f</u> day of April, 2013, to:

Roberto Salazar Salazar Law Firm, PLLC 1 E. Congress, Suite 165 Tucson, AZ 85701-1727 Email: Roberto@quelepaso.com Respondent

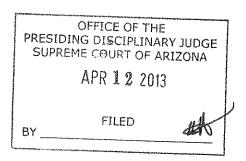
Copy of the foregoing <u>emailed</u> this  $\underline{5}^{++}$  day of April, 2013, to:

Honorable William J. O'Neil Presiding Disciplinary Judge Supreme Court of Arizona Email: officepdj@courts.az.gov Ihopkins@courts.az.gov

Copy of the foregoing hand-delivered this 5th day of April, 2013, to:

Lawyer Regulation Records Manager State Bar of Arizona 4201 N. 24th St., Suite 100 Phoenix, Arizona 85016-6266

by: Swalney T. BANG



# BEFORE THE PRESIDING DISCIPLINARY JUDGE OF THE SUPREME COURT OF ARIZONA

IN THE MATTER OF A MEMBER OF THE STATE BAR OF ARIZONA,

ROBERTO SALAZAR, Bar No. 023444

Respondent.

PDJ-2012-9109

FINAL JUDGMENT AND ORDER

[State Bar No. 11-3886, 12-1301, 12-1935]

The undersigned Presiding Disciplinary Judge of the Supreme Court of Arizona, having reviewed the Agreement for Discipline by Consent filed on March 11, 2013, and Supplement to Agreement For Discipline By Consent filed on April 5, 2013, pursuant to Rule 57(a), Ariz. R. Sup. Ct., hereby accepts the parties' proposed agreement. Accordingly:

IT IS HEREBY ORDERED that Respondent, Roberto Salazar, is hereby Reprimanded for his conduct in violation of the Arizona Rules of Professional Conduct, as outlined in the consent documents.

IT IS FURTHER ORDERED that, Respondent be placed on probation for a period of two years effective the date of this Order.

IT IS FURTHER ORDERED that, during the probation period of two (2) years, Respondent shall also complete the following:

CLE

Respondent shall complete the following CLE during the period of probation: (1) Nuts and Bolts of Civil Practice & Procedure (7 CLE hours); (2) Foundations of Immigration Law (2 CLE hours); (3) Fundamentals of Immigration Practice (4 CLE hours). Respondent shall provide Bar Counsel with evidence of completion by providing copies of handwritten notes. These hours are to be completed in addition to Respondent's annual CLE requirement. Respondent shall be responsible for the cost of the aforementioned CLE.

#### LOMAP

Respondent shall contact the director of the State Bar's Law Office Management Assistance Program (LOMAP), at 602-340-7332, within 30 days of the date of the final judgment and order. Respondent shall submit to a LOMAP examination of his office's procedures, including, but not limited to, compliance with ERs 1.3 and 1.4. The director of LOMAP shall develop "Terms and Conditions of Probation", and those terms shall be incorporated herein by reference. The probation period will commence at the time of the entry of the judgment and order and will conclude two years from that date. Respondent shall be responsible for any costs associated with LOMAP.

#### **FEE ARBITRATION**

Respondent also agrees to timely participate in fee arbitration with Complainant Ana Guadalupe Manzano-Vega relating to File No. 12-1935 and to pay any fee arbitration award that may be entered against him within thirty days of the date of the award.

#### NON-COMPLIANCE

In the event that Respondent fails to comply with any of the foregoing probation terms, and information thereof is received by the State Bar of Arizona, Bar Counsel shall file a notice of noncompliance with the Presiding Disciplinary Judge, pursuant to Rule 60(a)(5), Ariz. R. Sup. Ct. The Presiding Disciplinary Judge may conduct a hearing within 30 days to determine whether a term of probation has been breached and, if so, to recommend an appropriate sanction. If there is an allegation that Respondent failed to comply with any of the foregoing terms, the burden of proof shall be on the State Bar of Arizona to prove noncompliance by a preponderance of the evidence.

IT IS FURTHER ORDERED that Respondent pay the costs and expenses of the State Bar of Arizona in the amount of \$1,200.00. There are no costs or expenses incurred by the disciplinary clerk and/or Presiding Disciplinary Judge's Office in connection with these disciplinary proceedings.

**DATED** this \_\_\_\_\_ day of April, 2013.

The Honorable William J. O'Neil Presiding Disciplinary Judge

Original filed with the Disciplinary Clerk of the Office of the Presiding Disciplinary Judge of the Supreme Court of Arizona this \_\_\_\_\_ day of April, 2013.

Copies of the foregoing mailed/<u>emailed</u> this \_\_\_\_\_ day of April, 2013, to:

Roberto Salazar Salazar Law Firm PLLC 1 E. Congress, Suite 165 Tucson, AZ 85701-1727

Email: Roberto@quelepaso.com

Respondent

Copy of the foregoing hand-delivered/<u>emailed</u> this \_\_\_\_\_\_, 2013, to:

Nicole S. Kaseta Staff Bar Counsel State Bar of Arizona 4201 North 24th Street, Suite 100 Phoenix, Arizona 85016-6266 Email: Iro@staff.azbar.org

Sandra Montoya Lawyer Regulation Records Manager State Bar of Arizona 4201 North 24<sup>th</sup> Street, Suite 100 Phoenix, Arizona 85016-6266