

1 STATE BAR OF CALIFORNIA
OFFICE OF CHIEF TRIAL COUNSEL
2 MELANIE J. LAWRENCE, No. 230102
INTERIM CHIEF TRIAL COUNSEL
3 JOHN T. KELLEY, No. 193646
ASSISTANT CHIEF TRIAL COUNSEL
4 ELIZABETH G. STINE, No. 256839
SUPERVISING ATTORNEY
5 ABRAHIM M. BAGHERI, No. 294113
DEPUTY TRIAL COUNSEL
6 845 South Figueroa Street
Los Angeles, California 90017-2515
7 Telephone: (213) 765-1216

[EXEMPT FROM FILING FEES
PURSUANT TO GOV CODE §6103]

FILED

Superior Court of California
County of Los Angeles

FEB 11 2019

[Signature]
Amir D. Daminian

8
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

11 In the Matter of the Assumption of) Case No. **9STCP00367**
Jurisdiction Over the Unauthorized Law)
12 Practice of) ~~PROPOSED~~ ORDER TO SHOW CAUSE
13 JUDITH GIL, doing business as FJA AND) AND INTERIM ORDERS ASSUMING
ASSOCIATES.) JURISDICTION OVER THE
14) UNAUTHORIZED LAW PRACTICE OF
15) JUDITH GIL, dba FJA AND ASSOCIATES
16) AND INTERIM INJUNCTION
17)
18) [Rules of Court, rules 3.1200 et seq.;
Bus & Prof. Code §§ 6125, 6126(a), 6126.3, &
6030]
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)

19 **UPON CONSIDERATION** of the Ex Parte Application of the State Bar of California
20 for an Order to Show Cause and Interim Orders assuming jurisdiction by the court over the
21 unauthorized law practice of Judith Gil dba FJA and Associates and the supporting documents
22 filed therewith, and good cause appearing,

23 **THIS COURT FINDS** that it is more likely than not that the State Bar's Petition and
24 Application for Assumption of Jurisdiction Over the Unauthorized Law Practice of Judith Gil
25 dba FJA and Associates will be granted and that a delay in making the orders requested by the
26 State Bar will result in substantial injury to clients and/or the public.

1 Therefore, pending a hearing on the Order to Show Cause, this court hereby issues
2 interim orders to assume jurisdiction over the unauthorized law practice of Judith Gil dba FJA
3 and Associates, pursuant to Business and Professions Code section 6126.3., and further orders
4 that Melanie J. Lawrence, Interim Chief Trial Counsel of the State Bar of California, and her
5 designees, be appointed to do the following:

6 (1) Examine, retrieve, remove, and secure in a protected area all files and records of
7 Gil's unauthorized practice of law, located at the following addresses:

- 8 a. 4238 S. Western Avenue, Los Angeles, CA 90062;
- 9 b. 1864 W. 38th Street, Los Angeles, CA 90062;
- 10 c. 1254 W. 8th Street, Apt. 2, San Pedro, CA 90731;
- 11 d. 2011 Venice Blvd., Los Angeles, CA 90006;
- 12 e. 1921 5th Avenue, Los Angeles, CA 90018;
- 13 f. 1828 W. 38th Street, Los Angeles, CA 90062;

14 or at any other site in California where reliable evidence establishes that client files or
15 records of the unauthorized law practice may be stored, and obtain information as to any
16 pending matters that may require attention. The areas to be examined shall be as
17 described in **Attachment A**. The items to be retrieved, removed and secured in a
18 protected area and examined shall be as described in **Attachment B**;

19 (2) Notify persons and entities whom the State Bar reasonably believes to be Gil's
20 clients of the occurrence of the event or events stated in subdivision (a) of Section 6126,
21 and inform them that it may be in their best interest to obtain other legal counsel;

22 (3) Give notice to the depositor and appropriate persons and entities who may be
23 affected, other than clients, of the occurrence of the event or events;

24 (4) Apply for the extension of time pending employment of legal counsel by the
25 client, if necessary for the protection of the client's interests;

26 (5) Arrange for the surrender or delivery of clients' papers or property;

1 (6) Apply to the court for the appointment of a receiver, where applicable, to take
2 possession and control of any and all bank accounts relating to the affected person's
3 practice;

4 (7) Do any other acts that may be necessary or appropriate to carry out the purposes
5 of this section, including but not limited to the following:

6 (1) Photograph and/or videotape the execution of this order as necessary to
7 document compliance with this court's order.

8 (2) Make and retain electronic or hard copies of all data and information
9 retrieved in accordance with a court order.

10 (3) Retain all client files retrieved from the unauthorized practice and
11 distribute those client files to the clients.

12 (4) Freeze any and all bank accounts in the name of Judith Gil, FJA and
13 Associates, or any and all law-office-related bank accounts maintained by Judith Gil,
14 FJA and Associates.

15 (5) Endorse any check received by the State Bar which is made payable to the
16 order Judith Gil, FJA and Associates, or any and all law-office-related bank accounts
17 maintained by Judith Gil, FJA and Associates frozen pursuant to subparagraph (iv),
18 above.

19 (6) Direct the appropriate telephone company or companies to disconnect any
20 and all internet connections, telephone, telefax, DSL, and pager lines associated with
21 Judith Gil, FJA and Associates at the following addresses and phone numbers:

- 22 a. 4238 S. Western Avenue, Los Angeles, CA 90062;
23 b. 1864 W. 38th Street, Los Angeles, CA 90062;
24 c. 1254 W. 8th Street, Apt. 2, San Pedro, CA 90731;
25 d. 2011 Venice Blvd., Los Angeles, CA 90006;
26 e. 1921 5th Avenue, Los Angeles, CA 90018;
27 f. 1828 W. 38th Street, Los Angeles, CA 90062;

1 g. (323) 815-4247;

2 h. (323) 403-2245;

3 i. (323) 420-4802;

4 j. (323) 375-0988;

5 k. (323) 731-2295;

6 or at any other site in California where reliable evidence establishes that client
7 files or records of the unauthorized law practice may be stored, and to refer all
8 calls to a specific telephone line at the State Bar, which shall be established to
9 receive the calls.

10 (7) File a change of address notification with the United States Postal Service
11 to forward all mail addressed to Judith Gil, FJA and Associates at the following
12 addresses:

13 a. 4238 S. Western Avenue, Los Angeles, CA 90062;

14 b. 1864 W. 38th Street, Los Angeles, CA 90062;

15 c. 1254 W. 8th Street, Apt. 2, San Pedro, CA 90731;

16 d. 2011 Venice Blvd., Los Angeles, CA 90006;

17 e. 1921 5th Avenue, Los Angeles, CA 90018;

18 f. 1828 W. 38th Street, Los Angeles, CA 90062;

19 or at any other site in California where reliable evidence establishes that client
20 files or records of the unauthorized law practice may be stored to the attention of
21 Abraham Bagheri, State Bar of California, Office of Chief Trial Counsel, 845 S.
22 Figueroa Street, Los Angeles, CA 90017-2515.

23 (8) Open and examine all forwarded mail addressed to Judith Gil, FJA and
24 Associates.

25 MOREOVER,

26 (8) Judith Gil, or any other knowledgeable person found on the any of the premises of
27 the unauthorized law practice, should be ordered or authorized to provide to the State Bar
28

any and all passwords and/or protocols required to access the electronic data stored on any computer processing unit located at any of the premises of the unauthorized practice and/or removed from the unauthorized law practice pursuant to this order;

(9) Judith Gil, or any other person who is a signatory on any bank account frozen pursuant to subparagraph (iv), above, should be ordered or authorized to not withdraw any funds from any frozen account prior to the freeze order becoming effective.

(10) Any and all financial institutions should be ordered or authorized to provide, forthwith at the time of service of a copy of this order, a true copy of signature cards, the account numbers, and the last available monthly statements of any and all accounts frozen pursuant to subparagraph (iv), above, and should be ordered or authorized to disclose to the State Bar the balance of the frozen account(s) at the time of service without further order or subpoena.

(11) The appropriate telephone company or companies should be ordered or authorized to disconnect any and all telephone, telefax, and pager lines associated with the unauthorized law practice at the following addresses and phone numbers:

- a. 4238 S. Western Avenue, Los Angeles, CA 90062;
- b. 1864 W. 38th Street, Los Angeles, CA 90062;
- c. 1254 W. 8th Street, Apt. 2, San Pedro, CA 90731;
- d. 2011 Venice Blvd., Los Angeles, CA 90006;
- e. 1921 5th Avenue, Los Angeles, CA 90018;
- f. 1828 W. 38th Street, Los Angeles, CA 90062;
- g. (323) 815-4247;
- h. (323) 403-2245;
- i. (323) 420-4802;
- j. (323) 375-0988;
- k. (323) 731-2295;

1 or at any other site in California where reliable evidence establishes that client files or
2 records of the unauthorized law practice may be stored and to refer all calls to a specific
3 telephone line at the State Bar, which shall be established to receive the calls.

4 (12) The owner, manager, or any custodian of the premises should be ordered or
5 authorized to modify or remove any and all websites, social media pages and any other
6 Internet platform where legal services are marketed or advertised by Judith Gil, FJA and
7 Associates, and/or the State Bar be authorized to contact the web hosts of the applicable
8 website, social media page, or internet platform to modify or remove any existing
9 marketing or advertising by Judith Gil, FJA and Associates.

10 (13) The owner, manager, or any custodian of the premises should be ordered or
11 authorized to unlock the doors and provide access to the premises. If such owner,
12 manager or custodian cannot be located, any qualified locksmith should be ordered or
13 authorized to secure entry upon request of the State Bar using such devices or techniques
14 as are standard in the industry.

15 (14) The owner, manager, or any custodian of the premises should be ordered or
16 authorized to modify any and all websites, social media pages and any other Internet
17 platform where legal services are marketed or advertised and/or the State Bar be
18 authorized to contact the web hosts of the applicable website, social media page, or
19 internet platform to modify any existing marketing or advertising by Judith Gil, FJA and
20 Associates.

21 (15) Judith Gil, and/or any person having possession of any files and/or records
22 associated with the unauthorized practice of law, including electronic data stored on
23 computer processing units or in any other form or format, irrespective of site, should be
24 ordered or authorized to maintain such files and records intact, without alteration or
25 change of location, and to turn over all such files and records to the State Bar.

1 (16) The United States Postal Service should be authorized to enter a change of
2 address for all mail addressed to Judith Gil, FJA and Associates at the following
3 addresses:

- 4 a. 4238 S. Western Avenue, Los Angeles, CA 90062;
- 5 b. 1864 W. 38th Street, Los Angeles, CA 90062;
- 6 c. 1254 W. 8th Street, Apt. 2, San Pedro, CA 90731;
- 7 d. 2011 Venice Blvd., Los Angeles, CA 90006;
- 8 e. 1921 5th Avenue, Los Angeles, CA 90018;
- 9 f. 1828 W. 38th Street, Los Angeles, CA 90062;

10 or at any other site in California where reliable evidence establishes that client files or
11 records of the unauthorized law practice may be stored to the attention of Abraham
12 Bagheri, State Bar of California, Office of Chief Trial Counsel, 845 S. Figueroa Street,
13 Los Angeles, CA 90017-2515.

14 (17) Judith Gil, FJA and Associates located at following addresses:

- 15 a. 4238 S. Western Avenue, Los Angeles, CA 90062;
- 16 b. 1864 W. 38th Street, Los Angeles, CA 90062;
- 17 c. 1254 W. 8th Street, Apt. 2, San Pedro, CA 90731;
- 18 d. 2011 Venice Blvd., Los Angeles, CA 90006;
- 19 e. 1921 5th Avenue, Los Angeles, CA 90018;
- 20 f. 1828 W. 38th Street, Los Angeles, CA 90062;

21 or at any other site in California where reliable evidence establishes that client files or
22 records of the unauthorized law practice may be stored should be ordered to immediately
23 cease and desist from: (1) holding herself or themselves out as entitled to practice law in
24 California; (2) offering to perform or actually performing any act that constitutes the
25 unauthorized practice of law in violation of Business and Professions Code section
26 6126(a); (3) entering into any oral or written contractual agreement with any individual
27 or business to provide any service the performance of which would constitute the
28

1 unauthorized practice of law; and (4) receiving any money or fees from any individual or
2 business for any service the performance of which would constitute the unauthorized
3 practice of law.

4 **IT IS HEREBY FURTHER ORDERED THAT:**

5 (18) Each and all defendants are enjoining and restrained from engaged in the
6 unauthorized practice of law pursuant to Business and Professions Code section 6030.

7 (19) Judith Gil is to appear and show cause on 2/27, 2019
8 at 9³⁰ (a.m.) /p.m. in Department 86 of the Superior Court for the County of
9 Los Angeles, located at 111 N. Hill Street, Los Angeles, California 90012, why this court
10 should not assume jurisdiction over Judith Gil's unauthorized law practice pursuant to
11 Business and Professions Code section 6126.3, et seq., and issue orders as requested in
12 the Ex Parte Application filed by the State Bar of California herein.

13 (20) The State Bar of California shall serve upon Judith Gil a copy of the Petition and
14 Verified Application, the supporting Declarations and exhibits thereto, Memorandum of
15 Points and Authorities filed therewith, the Ex Parte Application for Interim Orders, and
16 this Order to Show Cause and Interim Orders in accordance with Business and
17 Professions Code, section 6180.4, by ~~7/22~~ 5 p.m. on 2/12, 2019.

18 (21) The State Bar of California shall file a proof of service with the court no later than
19 2/25, 2019.

20 (22) Any opposition papers by Judith Gil shall be filed in Department 86 by
21 4:00 p.m. on 2/20, 2019 and shall be served on the State Bar by the
22 same date and time.

23 (23) Any reply papers by the State Bar of California shall be filed in Department
24 86 by 4:00 p.m. on 2/25, 2019 and shall be served on
25 Judith Gil by the same date and time.

26 Dated: 2/11/19

27 By: [Signature]

28 ALL SERVICE IS
PERSONAL SERVICE

-8-

MITCHELL L. BECKLOFF, JUDGE

JUDGE OF THE SUPERIOR COURT
County of Los Angeles

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **Attachment A**

2 The area examined shall be Judith Gil, FJA and Associates, unauthorized law practice
3 located at the following addresses:

- 4 a. 4238 S. Western Avenue, Los Angeles, CA 90062;
5 b. 1864 W. 38th Street, Los Angeles, CA 90062;
6 c. 1254 W. 8th Street, Apt. 2, San Pedro, CA 90731;
7 d. 2011 Venice Blvd., Los Angeles, CA 90006;
8 e. 1921 5th Avenue, Los Angeles, CA 90018;
9 f. 1828 W. 38th Street, Los Angeles, CA 90062;

10 or at any other location in California where reliable evidence establishes that client files or
11 records of the unauthorized law practice may be stored.

12 The examination area shall include all locked or unlocked rooms, attics, basements, file
13 cabinets and other storage devices and areas and other parts therein and the surrounding grounds
14 and any garages, storage areas, trash containers and outbuildings of any kind located thereon,
15 under the care, control and/or custody of persons located at the law offices.

16 The examination shall also include any and all computers, and any other storage of
17 electronic information, brief cases, satchels, backpacks, day planners or purses under the care,
18 custody and/or control of persons located at the law offices.

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

Attachment B

The items to be retrieved, secured, and examined shall include all client files and client records including, but not limited to, notes, memoranda, pleadings, reports, correspondence, and other documents pertaining to legal or investigative service sought or provided, compensation sought or obtained for clients, and disbursement of client funds.

The items to be retrieved, secured and examined shall include all law office records, including, but not limited to, office memoranda, ledgers, journals, financial statements, checking and savings account records, bank statements, cancelled and uncanceled checks, cash, check ledgers, check registers, bank signature cards, bank books, deposits, withdrawals, legal files, and bank or other financial records, evidencing the obtaining, secreting, transferring, or concealing of assets.

The items to be retrieved, secured, and examined shall include any of the above-described evidence whether printed, hand-produced, or recorded photographically, electronically, mechanically, or by any other means. Where a file or record is maintained in a mechanical device such as cellular phone, fax machine, computer, video or audio apparatus, magnetic tapes, flash drive, discs (floppy, mini, CD, laser, flash drive, and hard drive), such apparatus in its entirety including complete hardware, supporting software for data retrieval, and material describing operation of the apparatus shall be retrieved, removed, and secured.

Where records and files are stored or maintained in a file cabinet or similar unit, the file cabinet or unit may be retrieved, removed, and stored with the records and files intact.

///

///

///