

CONFORMED COPY  
ORIGINAL FILED  
Superior Court of California  
County of Los Angeles

MAY 24 2018

Sherri R. Carter, Executive Officer/Clerk  
By: Jennifer De Luna, Deputy

1 STATE BAR OF CALIFORNIA  
2 OFFICE OF CHIEF TRIAL COUNSEL  
3 STEVEN J. MOAWAD, No. 190358  
4 CHIEF TRIAL COUNSEL  
5 MELANIE LAWRENCE, No. 230102  
6 DEPUTY CHIEF TRIAL COUNSEL  
7 RIZAMARI SITTON, No. 138319  
8 ASSISTANT CHIEF TRIAL COUNSEL  
9 ELIZABETH STINE, No. 256839  
10 SUPERVISING ATTORNEY  
11 TRINIDAD OCAMPO, No. 256217  
12 DEPUTY TRIAL COUNSEL  
13 845 South Figueroa Street  
14 Los Angeles, California 90017-2515  
15 Telephone: (213) 765-1486

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT

13 In the Matter of the Assumption of  
14 Jurisdiction Over the  
15 Unauthorized Law Practice of  
16 JESSICA GODOY RAMOS

) Case No. BS173729  
) ~~PROPOSED~~ ORDER TO SHOW CAUSE  
) AND INTERIM ORDERS ASSUMING  
) JURISDICTION OVER THE  
) UNAUTHORIZED LAW PRACTICE OF  
) JESSICA GODOY RAMOS AND INTERIM  
) INJUNCTION  
)  
) [Rules of Court, rules 3.1200 et seq.;  
) Bus & Prof. Code §§ 6125, 6126(a), 6126.3, &  
) 6030]

21 UPON CONSIDERATION of the Ex Parte Application of the State Bar of California  
22 for an Order to Show Cause and Interim Orders assuming jurisdiction by the court over the  
23 unauthorized law practice of Jessica Godoy Ramos, and the supporting documents filed  
24 therewith, and good cause appearing,

25 JESSICA GODOY RAMOS as the person operating the unauthorized law practice is  
26 HEREBY ORDERED TO SHOW CAUSE on June 7, 2018, at 1:30 PM in Department 82 of the

1 above entitled court located at 111 North Hill Street, Los Angeles, California 90012, why this  
2 court should not assume jurisdiction over her law practice pursuant to Business and Professions  
3 Code section 6180 et seq. and issue orders as requested in the Application submitted by the State  
4 Bar of California. The State Bar ~~order to show cause also includes whether~~ further applies for an order for assumption by the court over  
5 ~~Ramos's unauthorized practice of law, and for orders necessary for such an assumption,~~ **should be given**  
6 including an order appointing Steven J. Moawad, Chief Trial Counsel of the State Bar of  
7 California, or his designees, to direct and perform the duties set forth in Business and Professions  
8 Code section 6126.3, including:

- 9 (1) Examine, retrieve, remove, and secure in a protected area all files and records of Ramos's  
10 unauthorized practice of law located at 11252 Virginia Avenue, Lynwood, California  
11 91262, Homeland Security Investigation Offices at 300 Los Angeles Street, Los Angeles,  
12 CA 90012 or at any other site in California where reliable evidence establishes that client  
13 files or records of the unauthorized law practice may be stored, and obtain information as  
14 to any pending matters that may require attention. The areas to be examined shall be as  
15 described in **Attachment A**. The items to be retrieved, removed, and secured in a  
16 protected area and examined shall be as described in **Attachment B**;
- 17 (2) Notify persons and entities whom the State Bar reasonably believes to be Ramos's clients  
18 of the occurrence of the event or events stated in subdivision (a) of Section 6126, and  
19 inform them that it may be in their best interest to obtain other legal counsel;
- 20 (3) Give notice to the depositor and appropriate persons and entities who may be affected,  
21 other than clients, of the occurrence of the event or events;
- 22 (4) Arrange for the surrender or delivery of clients' papers or property;
- 23 (5) Apply to the court for the appointment of a receiver, where applicable, to take possession  
24 and control of any and all bank accounts relating to the affected person's practice;
- 25 (6) Do any other acts that may be necessary or appropriate to carry out the purposes of this  
26 section, including but not limited to the following:

1 (i) Photograph and/or videotape the execution of this order as necessary to  
2 document compliance with this Court's order.

3 (ii) Make and retain electronic or hard copies of all data and information retrieved  
4 in accordance with a court order.

5 (iii) Retain all client files retrieved from the unauthorized practice and distribute  
6 those client files to the clients.

7 (iv) Freeze any and all bank accounts in the name of Jessica Godoy Ramos, or  
8 any and all law-office-related bank accounts maintained by Jessica Godoy Ramos.

9 (v) Endorse any check received by the State Bar that is made payable to the order  
10 of Jessica Godoy Ramos, or any and all law-office-related bank accounts maintained  
11 by Jessica Godoy Ramos, frozen pursuant to subparagraph (iv), above.

12 **MOREOVER,**

13 (7) Jessica Godoy Ramos, or any other knowledgeable person found on the any of the  
14 premises of the unauthorized law practice, should be ordered or authorized to provide to  
15 the State Bar any and all passwords and/or protocols required to access the electronic data  
16 stored on any computer processing unit located at any of the premises of the unauthorized  
17 practice and/or removed from the unauthorized law practice pursuant to this order.

18 (8) Jessica Godoy Ramos, or any other person who is a signatory on any bank account  
19 frozen pursuant to subparagraph (iv), above, should be ordered or authorized not to  
20 withdraw any funds from any frozen account prior to the freeze order becoming effective.

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

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

6 (11) Jessica Godoy Ramos, and/or any person having possession of any files and/or records  
7 associated with the unauthorized practice of law, including electronic data stored on  
8 computer processing units or in any other form or format, irrespective of site, should be  
9 ordered or authorized to maintain such files and records intact, without alteration or  
10 change of location, and to turn over all such files and records to the State Bar.

11 (12) Jessica Godoy Ramos should be ordered to immediately cease and desist from: (1)  
12 holding herself out as entitled to practice law in California; (2) offering to perform or  
13 actually performing any act that constitutes the unauthorized practice of law in violation  
14 of Business and Professions Code section 6126(a); (3) entering into any oral or written  
15 contractual agreement with any individual or business to provide any service the  
16 performance of which would constitute the unauthorized practice of law; and (4)  
17 receiving any money or fees from any individual or business for any service the  
18 performance of which would constitute the unauthorized practice of law.

19 **THIS COURT FINDS** that it is more likely than not that the State Bar's Petition and  
20 Application for Assumption of Jurisdiction Over the Unauthorized Law Practice of Jessica  
21 Godoy Ramos will be granted and that a delay in making the orders requested by the State Bar  
22 will result in substantial injury to clients or to others.

23 Pending a hearing on the Order to Show Cause, this court hereby issues interim orders to  
24 assume jurisdiction over the unauthorized law practice of Jessica Godoy Ramos, pursuant to  
25 Business and Professions Code section 6126.3., and further orders that Steven J. Moawad, Chief  
26 Trial Counsel of the State Bar of California, and his designees, be appointed to do the following:

1 (1) Examine, retrieve, remove, and secure in a protected area all files and records of  
2 Ramos's unauthorized practice of law located the Los Angeles office of Homeland  
3 Security Investigation's Office at 300 N. Los Angeles Street, Los Angeles, California  
4 90012.

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

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

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

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

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

14 (3) The State Bar shall serve upon Jessica Godoy Ramos a copy of the Petition and Verified  
15 Application, the supporting Declarations and exhibits thereto, Memorandum of Points  
16 and Authorities filed therewith, the Ex Parte Application for Interim Orders, and this  
17 order to Show Cause and Interim Order in accordance with business and Professions  
18 Code, section 6180.4 by **4 PM on May 25, 2018.**

19 (4) The State Bar of California shall file a proof of service with the court no later than **May**  
20 **30, 2018.**

21 (5) Any opposition papers by Jessica Godoy Ramos shall be filed in Department 82  
22 by **4:00 p.m. on June 4, 2018** and shall be served on the State Bar by the same date and  
23 time, via overnight delivery.

24  
25 Dated:

*5/24/18*

By: 

**JAMES C. CHALFANT**  
JUDGE OF THE SUPERIOR COURT  
County of Los Angeles

1 **Attachment A**

2 The area examined shall be Jessica Godoy Ramos's unauthorized law practice located at  
3 11252 Virginia Avenue, Lynwood, California 91262, 8160 Rosecrans Avenue Unit #1112,  
4 Paramount, California 90723, and two storage containers held at Homeland Security  
5 Investigation's Los Angeles Office at 300 N. Los Angeles Street, Los Angeles, California 90012  
6 or at any other location in California where reliable evidence establishes that client files or  
7 records of the unauthorized law practice may be stored.

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

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

15 ///

16 ///

17 ///

1 **Attachment B**

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

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

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

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

21 ///

22 ///

23 ///