

**BEFORE THE PRESIDING DISCIPLINARY
JUDGE**

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

**KAREN L. HOBBS,
Bar No. 025545**

Respondent.

PDJ 2015-9113

FINAL JUDGMENT AND ORDER

[State Bar No. 15-0124]

FILED NOVEMBER 12, 2015

The Presiding Disciplinary Judge, having reviewed the Agreement for Discipline by Consent filed on October 30, 2015, pursuant to Rule 57(a), Ariz. R. Sup. Ct., hereby accepts the parties' proposed agreement. Accordingly:

IT IS ORDERED Respondent, **Karen L. Hobbs**, is reprimanded for her conduct in violation of the Arizona Rules of Professional Conduct, as outlined in the consent documents effective the date of this Order.

IT IS FURTHER ORDERED Ms. Hobbs shall pay the costs and expenses of the State Bar of Arizona in the amount of \$1,200.00, within thirty (30) days from the date of this Order. 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 12th day of November, 2015

William J. O'Neil

William J. O'Neil, Presiding Disciplinary Judge

Copies of the foregoing mailed/emailed
this 12th day of November, 2015, to:

J. Scott Rhodes
Jennings Strouss & Salmon, PLC
One E. Washington Street, Suite 1900
Phoenix, Arizona 85004-2554
Email: srhodes@jsslaw.com
Respondent's Counsel

Craig D. Henley
Senior Bar Counsel
State Bar of Arizona
4201 N. 24th Street, Suite 100
Phoenix, Arizona 85016-6266
Email: LRO@staff.azbar.org

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

by: JAlbright

**BEFORE THE PRESIDING DISCIPLINARY
JUDGE**

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

**KAREN L. HOBBS,
Bar No. 025545**

Respondent.

PDJ-2015-9113

**DECISION ACCEPTING CONSENT
FOR DISCIPLINE**

[State Bar No. 15-0124]

FILED NOVEMBER 12, 2015

A Probable Cause Order issued on September 18, 2015. No formal complaint has been filed. An Agreement for Discipline by Consent ("Agreement") was filed by the parties on October 30, 2015, and submitted under Rule 57(a)(3), Ariz. R. Sup. Ct¹. Upon filing such Agreement, the presiding disciplinary judge, "shall accept, reject or recommend modification of the agreement as appropriate."

Rule 57(a)(2) requires admissions be tendered solely "...in exchange for the stated form of discipline...." Under that rule, the right to an adjudicatory hearing is waived only if the "...conditional admission and proposed form of discipline is approved...." If the agreement is not accepted those conditional admissions are automatically withdrawn and shall not be used against the parties in any subsequent proceeding.

Under Rule 53(b)(3), notice of this Agreement was provided to the complainant by email on October 14, 2015. Complainant was notified of the opportunity to file a

¹ Unless stated otherwise, all rules referenced are the Arizona Rules of the Supreme Court.

written objection to the agreement with the State Bar within five (5) business days of bar counsel's notice. No objection has been filed. The conditionally admitted misconduct is summarized.

Ms. Hobbs is a prosecutor with the La Paz County Attorneys' Office. From January 2014 – January 2015, Ms. Hobbs utilized a plea bargaining practice in certain drug cases that was no longer permitted as a result of a modification to the Criminal Rules. Rule 15.8, Ariz. R. Crim. P., was amended effective January 1, 2014 and imposed disclosure obligations on all plea offers. Ms. Hobbs later learned of her erroneous and obsolete analysis and changed her plea bargaining practice.

Ms. Hobbs conditionally admits her misconduct violated Rule 42, ERs 3.4(a) (fairness to opposing party/counsel), 3.8(d) prosecutor disclosure/special responsibilities), and 8.4(d) (conduct prejudicial to the administration of justice). The parties stipulate to a reprimand and the payment of costs totaling \$1,200.00, to be paid within 30 days from this Decision and Order.

Presumptive Sanction

The parties agree the presumptive sanction is reprimand and *Standard 6.23*, Abuse of the Legal Process applies to Ms. Hobbs's violations of ERs 3.4(a) and 8.4(d).

Standard 6.23 provides:

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 a party, or interference or potential interference with a legal proceeding

Standard 5.23, Failure to Maintain the Public Trust applies to Ms. Hobb's violation of ER 3.8(d) and provides:

Reprimand is generally appropriate when a lawyer in an official or governmental position negligently fails to follow proper procedures or rules, and causes injury or potential injury to a party or to the integrity of the legal process.

Ms. Hobbs conditionally admits she negligently violated her duties to the legal system and the public causing actual injury to the legal system and public.

Aggravation and Mitigation

The agreed upon aggravating factor is: 9.22(c) (pattern of misconduct). Mitigating factors include: 9.32(a) (absence of prior disciplinary record), 9.32(d) (timely good faith effort to make restitution or to rectify consequences), and 9.32(e) (full disclosure to disciplinary board or cooperative attitude toward proceedings).

Ms. Hobbs has implemented a new plea process conforming to her ethical obligations and completed continuing legal education as recommended by the State Bar.

The object of lawyer discipline is to protect the public, the legal profession, the administration of justice, and to deter other attorneys from engaging in unprofessional conduct. *In re Peasley*, 208 Ariz. 27, 38, 90 P.3d 764, 775 (2004). Attorney discipline is not intended to punish the offending attorney, although the sanctions imposed may have that incidental effect. *Id.* Here, the PDJ is satisfied the proposed sanction of reprimand meets the objectives of discipline.

IT IS ORDERED incorporating the Agreement and any supporting documents by this reference. The agreed upon sanctions are: reprimand and \$1,200.00 in costs.

IT IS FURTHER ORDERED the Agreement is accepted. Costs as submitted are approved for \$1,200.00, and are to be paid within 30 days of the final judgment and order. These financial obligations shall bear interest at the statutory rate.

Now therefore, a final judgment and order is signed this date.

DATED this 12th day of November, 2015.

William J. O'Neil

William J. O'Neil, Presiding Disciplinary Judge

Copies of the foregoing were mailed/emailed
this 12th day of November, 2015 to:

Craig D. Henley
Senior Bar Counsel
State Bar of Arizona
4201 N. 24th Street, Suite 100
Phoenix, AZ 85016-6266
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Respondent's Counsel

**BEFORE THE PRESIDING DISCIPLINARY
JUDGE**

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

**KAREN L. HOBBS,
Bar No. 025545,**

Respondent.

PDJ 2015-

**AGREEMENT FOR DISCIPLINE BY
CONSENT**

[State Bar File No. 15-0124]

The State Bar of Arizona, through undersigned Bar Counsel, and Respondent, Karen L. Hobbs, who is represented in this matter by counsel, J. Scott Rhodes, hereby submit their Agreement for Discipline by Consent, pursuant to Rule 57(a), Ariz. R. Sup. Ct. A probable cause order was entered on September 18, 2015, but no formal complaint has been filed in this matter. Respondent voluntarily waives the right to an adjudicatory hearing, 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.

Pursuant to Rule 53(b)(3), Ariz. R. Sup. Ct., notice of this agreement was provided to the complainant by email on October 14, 2015. Complainant has been notified of the opportunity to file a written objection to the agreement with the State Bar within five (5) business days of bar counsel's notice.

Respondent conditionally admits that her conduct, as set forth below, violated Rule 42, Ariz. R. Sup. Ct., ER 3.4(a) - Fairness to Opposing Party and Counsel, ER 3.8(d) - Prosecutors Disclosure, and ER 8.4(d) - Conduct Prejudicial to the Administration of Justice. Upon acceptance of this agreement, Respondent agrees to accept imposition of the following discipline: Reprimand.

Respondent also agrees to pay the costs and expenses of the disciplinary proceeding, within 30 days from the date of this order, and if costs are not paid within the 30 days, interest will begin to accrue at the legal rate.¹ The State Bar's Statement of Costs and Expenses is attached hereto as Exhibit A.

FACTS

GENERAL ALLEGATIONS

1. Respondent was licensed to practice law in Arizona on June, 11, 2008.

COUNT ONE (File No. 15-0124/ Carr)

2. At all times relevant, Respondent was a prosecutor with the La Paz County Attorneys' Office.
3. Between January 2014 and January 2015, Respondent utilized a specific plea bargaining practice in certain drug cases involving the La Paz County Narcotics

¹ 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.

Task Force (LPCNTF)². The cases typically involved the police using confidential informants (hereinafter referred to as "CIs") to buy drugs from suspected drug dealers. All of the transactions were recorded by video recorder.

4. In an attempt to protect the CIs from threats and physical harm and to preserve the ability of the LPCNTF to recruit and utilize CIs for future operations, Respondent would offer the defendants a plea offer to one or more lesser felony offenses in exchange for a waiver of the defendants' right to obtain the CIs' identity. As part of the plea negotiation, Respondent would withdraw the plea if the defendants demanded disclosure of the CIs identity.

5. Unbeknownst to Respondent, Rule 15.8 of the *Arizona Rules of Criminal Procedure* was amended, effective January 1, 2014, to impose disclosure obligations on all plea offers thereby rendering Respondent's purported analysis obsolete.

6. Respondent investigated the constitutionality of her plea bargaining practice and relied upon the following in determining whether she was legally permitted to utilize her plea bargaining practice:

- a. The pre-January 2014 version of Rule 15.8 of the *Arizona Rules of Criminal Procedure* [imposing disclosure obligations on plea offers that contained deadlines for acceptance];
- b. Rule 15.4(b)(2) of the *Arizona Rules of Criminal Procedure* [relieving disclosure obligations regarding CIs who will not be called to testify at trial];
- c. The case of *US v. Ruiz*, 536 U.S. 622, 633 (2002) [relieving disclosure obligations regarding material impeachment evidence prior to entering a plea agreement];
- d. The case of *Rivera-Longoria v. Slayton*, 228 Ariz. 156, 264 P.3d 866 (2011) [defendants do not have a federal constitutional right to disclosure of information before entering into a plea bargain];

² La Paz County is a small rural county. The use of CIs is a mainstay in the investigation of illegal drug sales by the LPCNTF because the use of undercover law enforcement officers is less feasible in small communities where officers and strangers are easily recognized.

- e. The Washington case of *State v. Moen*, 76 P.3d 721 (Wash. 2003) [upholding prosecutor's policy of refusing to plea bargain if the criminal defense has obtained the disclosure of a confidential informant]; and
- f. The Illinois case of *People v. Moore*, 804 N.E.2d 595 (Ill. Ct. App. 2003) [upholding, on due process grounds, the prosecutor's decision to withdraw his plea offer and refuse to engage in future plea negotiations after the defendant insisted on CIs' identity].

7. Respondent also claims that her lack of knowledge was due in part to her use of the 2013-2014 version of the *Arizona Rules of Criminal Procedure* which had not been properly updated with the pocket reference detailing changes.

8. While the total number of defendants impacted by Respondent's plea bargaining process is unknown, Complainant identifies two cases in particular that caused a negative impact on the La Paz County Public Defender's Office (hereafter referred to as "PD"), their clients and the general public.

9. Complainant indicates that, at least initially, the defendants were able to make an educated guess as to the identity of the CI which allowed the PD to run conflict checks. Complainant indicates that when the PD believed that a conflict existed, the PD would conflict off of the case.

10. In the two cases cited by Complainant, the PD was unable to run an accurate conflict check as the clients either misspelled or otherwise misidentified the CI.

11. In the La Paz County Superior Court case of *State v. Kuffel*, CR201400183, Respondent was the attorney of record for the State and Complainant was the attorney of record for the defendant.

12. The defendant consistently rejected all plea offers and proclaimed his innocence.

13. On January 12, 2015, the matter was set for a February 9, 2015, pretrial conference and a May 13, 2015, jury trial. Earlier that same day, Respondent disclosed the identity of the CI to the PD. While Complainant requested that the Court order Respondent to disclose information as to the CI's availability and possible incarceration in the State of California, the Court refused to order the disclosure and suggested that Complainant file the appropriate motions.³

14. When Complainant realized that the PD had a conflict, the case was re-assigned to new counsel, the Brad Rideout Law Firm.

15. While Mr. Rideout was not able to appear at the pretrial conference, a February 9, 2015, minute entry identifies the substitution of counsel due to the conflict. The minute entry also incorrectly states that the trial will proceed on March 13, 2015, and continues the pretrial conference to March 9, 2015.

16. As part of her efforts to mitigate her plea bargaining practice, Respondent extended the plea offer in the original case and later requested consecutive time in the new case.

17. On March 9, 2015, the Court administratively reassigns the case to another judge and set a pretrial conference on April 2, 2015. Based upon a request by Mr. Rideout, the Court also vacated the May 13, 2015 trial date.⁴

³ Complainant first requested the information by e-mail dated November 2014. Despite Respondent's November 14, 2014, response indicating that "(she) will inquire and let you know", Respondent failed to disclose this information.

⁴ The Court also appears to have sua sponte consolidated the existing case with a new case (CR201500054).

18. In the La Paz County Superior Court case of *State v. Delano*, CR201400179, Respondent also engaged in the previously described plea bargaining practice.

19. On November 7, 2014, PD filed a motion to compel disclosure.

20. On November 10, 2014, a hearing was held and defendant requested that the matter be set for trial. One week later, Respondent requested that the Court schedule a *Donald* hearing. The Court scheduled a November 24, 2014, *Donald* hearing and set the matter for a January 22, 2015 trial.

21. On November 24, 2014, the Court refused to conduct the *Donald* hearing based upon the outstanding disclosure issue.

22. On November 26, 2014, Respondent disclosed the CI's identity and other information including, but not limited to, information that the CI was participating in the Task Force to "work off" certain charges.

23. On December 19, 2014, defendant filed a motion to set oral argument on the motion to compel disclosure.

24. On or before December 29, 2014, Respondent disclosed additional information regarding the CI including, but not limited to, the fact that the CI was being compensated for his participation in the Task Force. Respondent claims that she was unaware that the CI was being paid for his informant services instead of "working off" charges as originally disclosed.

25. On December 31, 2014, the Court ordered the production of a redacted copy of the CI contract which Respondent complied with the same day.

26. In December 2014, Respondent observed a Mohave County trial and spoke to the prosecutor regarding the Mohave plea bargaining practices.

27. In early January 2015, Respondent travelled to Phoenix where she sought the advice of various Maricopa County prosecutors and discussed her plea bargaining practice with them.

28. During these discussions, Respondent became aware of the errors in her analysis and how her plea bargaining practice was at odds with the defendants' rights under the revised *Arizona Rules of Criminal Procedure*.

29. Beginning January 2015, Respondent began mitigating the harm caused by her plea bargaining practice by disclosing CI packets and re-extending the original plea offers in pending cases.

30. On January 13, 2015, after various motions in the *Delano* case, the Court precluded the CI from testifying.

31. After a hearing on January 20, 2015, the Court excluded the videotape of the purported transaction as a sanction for Respondent's failure to disclose. The court specifically noted that it did not find bad faith.

32. On January 21, 2015, Respondent filed a motion to dismiss without prejudice which was granted by the Court.

CONDITIONAL ADMISSIONS

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

Respondent conditionally admits that her conduct violated Rule 42, Ariz. R. Sup. Ct., ER 3.4(a) - Fairness to Opposing Party and Counsel, ER 3.8(d) - Prosecutors Disclosure, and ER 8.4(d) - Conduct Prejudicial to the Administration of Justice.

CONDITIONAL DISMISSALS

Inapplicable, as there are no dismissals.

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, a Reprimand is appropriate. If Respondent violates any of the terms of this agreement, further discipline proceedings may be brought.

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 the following

Standards are the appropriate *Standards* given the facts and circumstances of this matter:

- ER 3.4(a) (Fairness to Opposing Party/Counsel)

Standard 6.23

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.

- ER 3.8(d) (Special Responsibilities)

Standard 5.23

Reprimand is generally appropriate when a lawyer in an official or governmental position negligently fails to follow proper procedures or rules, and causes injury or potential injury to a party or to the integrity of the legal process.

- ER 8.4(d) (Administration of Justice)

Standard 6.23

Reprimand is generally appropriate when a lawyer negligently fails to comply with a court order or rule, and there is injury or potential injury to a client or a party, or interference or potential interference with a legal proceeding.

The duty violated

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

The lawyer's mental state

For purposes of this agreement the parties agree that Respondent negligently engaged in a plea negotiation process that was in violation of the Rules of Professional Conduct.

The extent of the actual or potential injury

For purposes of this agreement, the parties agree that there was actual harm to the legal system and the public.

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) pattern of misconduct.

In mitigation:

Standard 9.32(a) absence of a prior disciplinary record;

Standard 9.32(d) timely good faith effort to rectify consequences of misconduct;

Standard 9.32(e) full and free disclosure to disciplinary board or cooperative attitude towards proceedings.

Discussion

The parties have conditionally agreed that, upon application of the aggravating and mitigating factors to the facts of this case, the presumptive sanction is appropriate.

The parties have conditionally agreed that a greater or lesser sanction would not be appropriate under the facts and circumstances of this matter. While a period of probation was originally considered, Respondent has implemented a new plea process conforming with her ethical obligation and completed all of the Continuing Legal Education programs recommended by the State Bar.

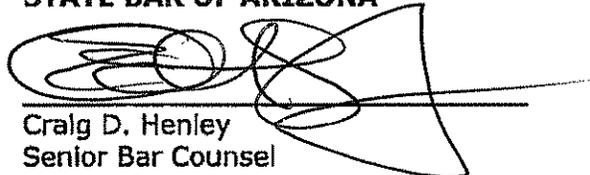
Based on the *Standards* and in light of the facts and circumstances of this matter, the parties conditionally agree that the sanction set forth above is within the range of appropriate sanction and will serve the purposes of lawyer discipline.

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 and the imposition of costs and expenses. A proposed form order is attached hereto as Exhibit B.

DATED this 30th day of October 2015.

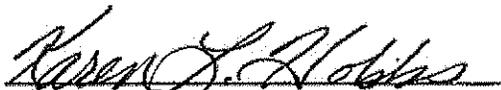
STATE BAR OF ARIZONA



Craig D. Henley
Senior Bar Counsel

This agreement, with conditional admissions, is submitted freely and voluntarily and not under coercion or intimidation.

DATED this 28th day of October, 2015.



Karen L. Hobbs
Respondent

DATED this 28th day of October, 2015.

Jennings Strouss & Salmon, PLC



J. Scott Rhodes
Counsel for Respondent

Approved as to form and content


Maret Vessella
Chief Bar Counsel

Original filed with the Disciplinary Clerk of
the Office of the Presiding Disciplinary Judge
of the Supreme Court of Arizona
this 30TH day of October, 2015.

Copy of the foregoing emailed
this 30TH day of October, 2015, to:

The Honorable William J. O'Neil
Presiding Disciplinary Judge
Supreme Court of Arizona
1501 West Washington Street, Suite 102
Phoenix, Arizona 85007
E-mail: officepdj@courts.az.gov

Copy of the foregoing mailed/emailed
this 30TH day of October, 2015, to:

J. Scott Rhodes
Jennings Strouss & Salmon, PLC
One E. Washington Street, Suite 1900
Phoenix, Arizona 85004-2554
Email: srhodes@jsslaw.com
Respondent's Counsel

Copy of the foregoing hand-delivered
this 30TH day of October, 2015, to:

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

by: 

EXHIBIT A

Statement of Costs and Expenses

In the Matter of a Member of the State Bar of Arizona,
Karen L. Hobbs, Bar No. 025545, Respondent

File No. 15-0124

Administrative Expenses

The Supreme Court of Arizona has adopted a schedule of administrative expenses to be assessed in lawyer discipline. If the number of charges/complainants exceeds five, the assessment for the general administrative expenses shall increase by 20% for each additional charge/complainant where a violation is admitted or proven.

Factors considered in the administrative expense are time expended by staff bar counsel, paralegal, secretaries, typists, file clerks and messenger; and normal postage charges, telephone costs, office supplies and all similar factors generally attributed to office overhead. As a matter of course, administrative costs will increase based on the length of time it takes a matter to proceed through the adjudication process.

General Administrative Expenses for above-numbered proceedings

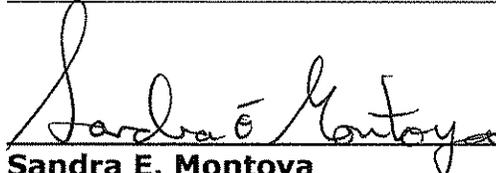
\$1,200.00

Additional costs incurred by the State Bar of Arizona in the processing of this disciplinary matter, and not included in administrative expenses, are itemized below.

Staff Investigator/Miscellaneous Charges

Total for staff investigator charges \$ 0.00

TOTAL COSTS AND EXPENSES INCURRED \$1,200.00



Sandra E. Montoya
Lawyer Regulation Records Manager

10-14-15

Date

EXHIBIT B

**BEFORE THE PRESIDING DISCIPLINARY
JUDGE**

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

**KAREN L. HOBBS,
Bar No. 025545,**

Respondent.

PDJ 2015-

FINAL JUDGMENT AND ORDER

[State Bar No. 15-0124]

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

IT IS HEREBY ORDERED that Respondent, **Karen L. Hobbs**, is hereby Reprimanded for her conduct in violation of the Arizona Rules of Professional Conduct, as outlined in the consent documents.

IT IS FURTHER ORDERED that Respondent pay the costs and expenses of the State Bar of Arizona in the amount of \$1,200.00, within 30 days from the date of service of this Order. 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 October, 2015

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 October, 2015.

Copies of the foregoing mailed/mailed
this _____ day of October, 2015, to:

J. Scott Rhodes
Jennings Strouss & Salmon, PLC
One E. Washington Street, Suite 1900
Phoenix, Arizona 85004-2554
Email: srhodes@jsslaw.com
Respondent's Counsel

Copy of the foregoing emailed/hand-delivered
this _____ day of October, 2015, to:

Craig D. Henley
Senior Bar Counsel
State Bar of Arizona
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Phoenix, Arizona 85016-6266
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by: _____