



The State Bar
of California

OFFICE OF CHIEF TRIAL COUNSEL

845 S. Figueroa Street, Los Angeles, CA 90017

213-765-1205

michelle.king@calbar.ca.gov

November 16, 2020

SENT VIA EMAIL TO: *indagrodarryl@gmail.com*

Darryl Cotton
6176 Federal Blvd.
San Diego, CA 92114

RE: Case Numbers: 20-O-02528, 20-O-02529, 20-O-02530, 20-O-02531, 20-O-02532, 20-O-02533,
and 20-O-02543
Respondents: Shammam, Shapiro, Cline, Nguyen, McElfresh, Morgan-Reed, and Austin

Dear Mr. Cotton:

This will acknowledge receipt on November 13, 2020, of your email dated November 13, 2020, regarding the above cases.

Your additional material containing new evidence or allegations has been reviewed, and the determination has been made that we do not have grounds to reopen our file for disciplinary action.

As stated in our original closing letters dated June and August 11, 2020, complainants have the right to request that the Complaint Review Unit conduct a review of the Office of Chief Trial Counsel's decision to close a complaint. In order to meet the deadline for requesting review, you must submit your request in writing, **post-marked within 90 days of the date of the original closing letter**, to:

The State Bar of California
Complaint Review Unit
Office of General Counsel
180 Howard Street
San Francisco, CA 94105-1617.

Thank you for bringing these matters to our attention.

Respectfully,

Michelle King
Investigator

MK:wss

San Francisco Office
180 Howard Street
San Francisco, CA 94105

www.calbar.ca.gov

Los Angeles Office
845 S. Figueroa Street
Los Angeles, CA 90017



Darryl Cotton <indagrodarryl@gmail.com>

RE: State Bar Case Nos. 20-O-02528 et al.

King, Michelle <Michelle.King@calbar.ca.gov>
To: Darryl Cotton <indagrodarryl@gmail.com>

Mon, Nov 16, 2020 at 1:55 PM

Mr. Cotton-

The attorney reviewed the information and that is why you received the letter. You will need to take your issue to CRU per the instructions in the letter.

Respectfully,

Michelle King

Investigator, Office of Chief Trial Counsel

[The State Bar of California](#) | 845 S. Figueroa St. | Los Angeles, CA 90017213-765-1205 | Michelle.King@calbar.ca.gov***Working to protect the public in support of the mission of the State Bar of California.***

Please consider the environment before printing this email.

From: Darryl Cotton <indagrodarryl@gmail.com>
Sent: Monday, November 16, 2020 11:38 AM
To: King, Michelle <Michelle.King@calbar.ca.gov>
Subject: Re: State Bar Case Nos. 20-O-02528 et al.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ms. King,

In response to your decision to not reopen my complaint, isn't this new evidence I've provided you that shows Corina Young provided the Nguyen emails that told her not to testify even though she had been willing to and was under a lawful subpoena to do so consistent with their professional responsibilities under the California Rules of Professional Conduct 3.4 which states; "A lawyer... shall not suppress any evidence that the lawyer or the lawyer's client has a legal obligation to reveal or to produce." CRPC 3.4(b)?

Darryl Cotton

On Mon, Nov 16, 2020 at 9:15 AM Scherffius, Warren <Warren.Scherffius@calbar.ca.gov> wrote:

Dear Darryl Cotton:

Attached please find a letter that I am sending on behalf of State Bar Investigator Michelle King related to State Bar Case Nos. 20-O-02528 et al. (Respondents Q. Shammam et al.). If you have any questions regarding the content of the letter, please contact Ms. King (only) at (213) 765-1205 or at Michelle.King@calbar.ca.gov. Thank you.

Sincerely,

Warren Scherffius

Administrative Assistant II | Office of Chief Trial Counsel

The State Bar of California | [845 S. Figueroa St.](#) | Los Angeles, CA 90017

213.765.1290 | Warren.Scherffius@calbar.ca.gov

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This message may contain confidential information. Unless you are the intended recipient or are authorized to receive information for the intended recipient, you may not use, copy, or disclose the message in whole or in part. If you have received this message in error, please advise the sender by reply e-mail and delete all copies of the message. Thank you.



Darryl Cotton <indagrodarryl@gmail.com>

Re: State Bar complaints

1 message

Darryl Cotton <indagrodarryl@gmail.com>
To: "King, Michelle" <Michelle.King@calbar.ca.gov>
Cc: Joe Hurtado <j.hurtado1@gmail.com>

Fri, Nov 13, 2020 at 11:53 AM

Ms. King,

I haven't heard from you since our last email exchange in which you were going to follow up with my litigation investor Joe Hurtado in regards to my BAR complaints. I trust that for the record you were able to make that connection.

On another note I wanted to share recent developments in my federal court proceedings that go directly to the fraud on the court in which attorneys Natalie Nguyen and Matt Shapiro engaged in by unlawfully keeping their client, Corina Young from providing the case dispositive testimony that was promised and was to be provided for under subpoena. The following attachments will make this clear:

1) 10/27/20 This email was sent out as a notification to all parties associated with the case, the DOJ and the media that the newly discovered evidence I found from my City of Lemon Grove FOIA request would prove that the defendants had conspired to deny me of my civil rights and in the process had committed a fraud upon the court. Corina Young was one of those parties included in that email.

2.0) 10/28/20 Young saw the email and the number and types of recipients and decided that she wanted to distance herself from the fact she did not comply with a lawful subpoena and had only been following her attorney's, Natalie Nguyen and Matt Shapiro's advice and instructions. This email and the attachments, would show privileged communication that went between her and attorney Natalie Nguyen regarding that subpoena and her choosing to ignore it.

2.1) Attachment "Email #1"; Here you will see the ongoing communication that existed between my lawyer Jacob Austin and Nguyen/Young. As you can see in Nguyen's communication to Young she Austin's lawful requests for Young to provide her testimony was "bluffing". This is astounding and IMO nothing short of legal malpractice on the part of Nguyen.

2.2) Attachment "Email 2"; As a litigant in this matter, when I saw this email from Nguyen to Young I was PISSED! Just days after Geraci getting a jury verdict in this case, I see that Nguyen sends this email to Young in which she informs Young that Geraci got the win. How would that decision have mattered to Nguyen or Young unless they were watching the case to make sure that I lost? That win came as a direct result of Nguyen/Young NOT PROVIDING HER TESTIMONY! Then to top it off Nguyen tells Young she doesn't owe her anything for her services! That's right! Shapiro paid for Nguyen to keep Young from providing that case dispositive testimony.

3) 10/29/20 Armed with THIS latest information I filed an Omnibus Sur-Reply with the court to include the latest Young/Nguyen information I received.

4) 10/29/20 My declaration affirms this evidence.

5) 11/02/20 My Proof of Service which shows that defendant Gina Austin and her attorneys at Pettit Kohn have begun blocking my emails for service.



Ms. King I don't care what it takes. These people are unethical and an absolute disgrace to the legal profession. What's it going to take to hold them professionally responsible for their actions? I need the CA BAR to reopen my complaints and armed with this latest evidence move swiftly to see that they are

held completely accountable for what they have done. I did not agree with your decision to close these complaints and when it came to Nguyen your rationale was that she had a responsibility to do what was in her clients best LEGAL interests. Actively engaged in ignoring a subpoena and stringing my attorney on with bullshit promises and lies just to buy time to where I never get that testimony in time for trial does not constitute acts of legal representation. I HOPE you agree with that statement. Having a BAR card does not give them license to act in these unlawful manners. Tell me what to do to assist you in these efforts. I will not rest until justice is done. To that end, as I write this, Judge Robinson has not yet issued any rulings in regards to my latest motions surrounding this evidence. I fully intend on including this email in my next round of submissions and will be sharing it with numerous media outlets in an effort to expose these corrupt purveyors of law for what they really are. A stain upon the legal profession.

Thank you for your consideration and in anticipation of your reply I will remain.

Darryl Cotton
619.954.4447

On Mon, Jun 8, 2020 at 9:15 AM King, Michelle <Michelle.King@calbar.ca.gov> wrote:

Mr. Cotton-

I have not received further information from you that was requested during our interview on May 27, 2020. I can give you until this Wednesday, June 10th to provide us with information to review in order to move forward with your complaints. If I do not receive any information, we will move forward with closing the complaints against attorneys Nguyen, Shapiro, and Austin as we discussed.

Thank you,

Michelle King

Investigator, Office of Chief Trial Counsel

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7 attachments



10-27-20 Cotton's Email re Newly Discovered FOIA Evidence.pdf

115K



2.0) 10-28-20 Young Email Response to Cotton.pdf

71K

 **2.1) Email #1.pdf**
299K

 **2.2) Email 2.pdf**
133K

 **3) 10-29-20 Cotton's Omnibus Sur-Reply.pdf**
676K

 **4) 10-29-20 Cotton's Declaration-Exhibits-POS re Corina Young.pdf**
2167K

 **5) 11-02-20 Proof of Service and Exhibits.pdf**
6233K





Darryl Cotton <indagrodarryl@gmail.com>

RE: State Bar complaints

j.hurtado1@gmail.com <j.hurtado1@gmail.com>

Fri, Nov 13, 2020 at 12:19 PM

To: Darryl Cotton <indagrodarryl@gmail.com>, "King, Michelle" <Michelle.King@calbar.ca.gov>

Darryl, please do not include me in any of your emails to any parties. I have repeatedly told you I do not want to be involved.

Ms. King, Mr. Cotton's actions are taken on his own behalf. As we already discussed, your organization is impotent to provide any relief and being part of your worthless investigations serve to ratify the illegal actions by attorneys such as Nguyen. Please do not involve me.

From: Darryl Cotton <indagrodarryl@gmail.com>
Sent: Friday, November 13, 2020 11:53 AM
To: King, Michelle <Michelle.King@calbar.ca.gov>
Cc: Joe Hurtado <j.hurtado1@gmail.com>
Subject: Re: State Bar complaints

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