



## Attorney Misconduct Complaint Form

Your Contact Information			
First Name: Darryl	Middle Name: Gerard		
Last Name: Cotton			
Address: 6176 Federal Blvd			
City: San Diego	State: CA	Zip: 92114	
Email: indagrodarryl@gmail.com			
Home Phone: none	Work: none	Cell: 619.954.4447	
Attorney's Information			
First Name: Scott	Middle Name: Harrison		
Last Name: Toothacre			
Address: Ferris & Britton, 501 W Broadway St Ste 1450			
City: San Diego	State: CA	Zip: 92101	
Email: stoothacre@ferrisbritton.com	CA Bar License #: 146530		
Home Phone: unknown	Work Phone: (619) 233-3131		
Cell Phone: unknown	Website: www.ferrisbritton.com		
<p>Have you or a member of your family complained to the State Bar about this attorney previously?</p> <p><input type="checkbox"/> YES      <input checked="" type="checkbox"/> NO</p> <p>Did you hire this attorney?</p> <p><input type="checkbox"/> YES      <input checked="" type="checkbox"/> NO</p> <p>Enter the approximate date you hired the attorney and the amount paid (if any) to the attorney.</p> <p>Date: _____ Amount Paid: _____</p>			

**What is your connection to this attorney? Explain briefly.**

Toothacre was co-counsel with Weinstein who represented Geraci and Berry in Geraci v Cotton case no 37-2017-00010073 and my cross complaint.

**Attorney's Information**

**Statement of Complaint**

Include with your submission, a statement of what the attorney did or did not do that is the basis of your complaint. Please state the facts as you understand them. Do not include opinions or arguments. If you hired the attorney(s), state what you hired the attorney(s) to do. Additional information may be requested.

Toothacre along with was actively involved in defrauding the court on behalf of his clients in the above referencd case. Toothacre had a responsibility to inform the court that the 11/02/16 document was not a full integrated contract and that the 03/21/17 lawsuit was a sham lawsuit. During my litigation investors (Hurtado) deposition, Toothacre was apprised of the evidence and it was during that exchange where Toothacre tried to defend his position with statements that went towards his not having knowledge of the documents that contained his signature. Toothacre was visibly upset and nervous during that deposition. Yet at trial he failed to exxcercise his ethical responsibility to the court and proceeded to defend his clients and firms actions in deceiving the court.

### Related Court Case Information (If known)

Name of Court: Superior Court

Case Name: Geraci v Cotton

Case Number: 37-2017-000

Approx. date case was filed: 11/21/17

Size of law firm complained about: NA

If you are not a party to this case, what is your connection with it? Explain briefly.

I am a party.

### Translation Information

Not Applicable

The State Bar accepts complaints in over 200 languages. If you need translation services to communicate with the State Bar, please let us know by completing this section of the complaint form. We will communicate with you through a translation service in the language of your choice. Do you need translation services?

YES

NO

Please state the language in which you need formal translation:

\_\_\_\_\_

The State Bar's mission is to protect complainants regardless of their immigration status. Complainants who are unable to complete this form due to disability, language restrictions, or other circumstances may obtain help by calling the complaint line at 800-843-9053.

### Attestation

By checking this box I certify that all information on this form is true and correct. I understand that the content of my complaint can be disclosed to the attorney. I understand that I waive the attorney client privilege and any other applicable privilege between myself and the attorney to the extent necessary for the investigation and prosecution of the allegations.

Signature: \_\_\_\_\_



Date: 02/06/2020 \_\_\_\_\_