



## 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: Timothy		Middle Name: Jude	
Last Name: Vanden Heuvel			
Address: Office of the Attorney General, 600 W Broadway Ste 1800			
City: San Diego		State: CA	Zip: 92101
Email: Tim.Vandenheuvel@doj.ca.gov		CA Bar License #: 140731	
Home Phone: unknown		Work Phone: (619) 738-9095	
Cell Phone: unknown		Website:	
<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.**

Vanden Heuvel was, at the time, working as an atty for Lewis & Brisbois as co-counsel with atty Kenneth Feldman (130699) who I have also filed a CA-BAR complaint on, when he represented Finch Thornton and Baird, atty's David Demian and Adam Witt.

### **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.

In his response, Vanden Heuvel argued that my complaint be dismissed on procedural grounds and never addressed the foundational elements of; Fraud, Abuse of Process, RICO, Civil Conspiracy and Legal Malpractice charges contained within my complaint. I believe this was done purposely to protect Lewis and Brisbois and co-counsel Kenneth Feldman from having to notify the court that their client had maintained a frivolous state court lawsuit. This sidestepping of the issues should not be seen by the courts, or CA-BAR as ethical or acceptable practices. Ideally I would like to see atty Vanden Heuvel disbarred or at a minimum, sanctioned for having participated in perpetuating this fraud upon both myself and the court.

### Related Court Case Information (If known)

Name of Court: US District Court

Case Name: Cotton et al v Geraci et al

Case Number: 18-cv2751W AGS

Approx. date case was filed: 12/06/18

Size of law firm complained about:

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

I am a party in the above referenced case.

### 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