

OFFICE OF CHIEF TRIAL COUNSEL

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Attorney Misconduct Complaint Form

Your Contact Information					
First Name: Darryl		Middle Name: Gerard		erard	
Last Name: Cotton					
Address: 6176 Federal Blvd					
City: San Diego		State: CA		Zip: 92114	
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Attorney's Information			•		
First Name: Natalie			Middle Nam	ne: Trang-My	
Last Name: Nguyen					
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City: La Jolla		State: CA		Zip: 92037	
Email: natalie@nguyenla	om CA Bar License #: 246753				
Home Phone: unknown		Work Phone: (858) 757-8577			
Cell Phone: unknown		Website: www.nguyenlawcorp.com			
Have you or a member of your famil YES NO Did you hire this attorney?					
YES NO Enter the approximate date you hired the attorney and the amount paid (if any) to the attorney. Date: Amount Paid:					

What is your connection to this attorney? Explain briefly.

Nguyen represented Ms. Corina Young who was a material fact witness in the above referenced case. Nguyen was not hired by Young. Nguyen was hired my atty Matt Shapiro (292542) who I have also filed a CA-BAR complaint against. Shapiro knew he was involved in an illegal plot to help his client Aaron Magagna acquire a Condtional Use Permit (CUP) for a licensed Marijuana Outlet (MO) that if granted, because of the setback/spacing regulations that the City of SD has between MO licenses, would make my CUP ineligible for the license. Shapiro represented not only Magagna but Young as well. He needed another attorney to represent Young and that atty would have to be willing to use any means necessary to keep Young from being deposed or testify at trial. Shapiro picked Nguyen for this task and she cooperated fully.

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.

On or about 01/16/19 my atty, Jacob Austin had a series of email exchanges with Nguyen that would make Young available for a deposition. Young would have testified to her relationship with Shapiro, Magagna and a political lobbyist James Bartell when it comes to maintaining illegal, unlicensed cannabis dispensaries and how Magagna was the straw person being used to acquire a competing license to mine which once granted would disqualify my application. Nguyen was a good soldier for her team. She kept telling Austin she was working on scheduling a mutually acceptable date or would atleast provide a sworn statement for our use at trial. Besides multiple promises by email and phone, that never occurred. Since Young's testimony was never provided it played a large part in evidence we were not able to bring to the jury and I lost a verdict against Geraci. After the trial it became known that Shapiro had paid for Nguyen's services. Nguyen should be disbarred for her unethical participation in this scheme.

Related Court Case Information (If know	n)		
Name of Court: Superior Court	Case Name: Geraci v Cotton		
Case Number: 37-2017-00010073	Approx. date case was filed: 03/21/17		
Size of law firm complained about:			
If you are not a party to this case, what is your coll am a party in the above referenced case.	onnection with it? Explain briefly.		
Translation Information			
The State Bar accepts complaints in over 200 lang communicate with the State Bar, please let us known will communicate with you through a translatineed translation services? YES NO Please state the language in which you need form	ow by completing this section of the complaint form. tion service in the language of your choice. Do you		
The State Bar's mission is to protect complainants reg who are unable to complete this form due to disability may obtain help by calling the complaint line at 800-8	/, language restrictions, or other circumstances		
Attestation			
By checking this box I certify that all inform understand that the content of my complai understand that I waive the attorney client between myself and the attorney to the exprosecution of the allegations. Signature:	int can be disclosed to the attorney. I privilege and any other applicable privilege		