

FILED

SEP 10 2014

BEFORE THE  
DISCIPLINARY BOARD  
OF THE  
WASHINGTON STATE BAR ASSOCIATION DISCIPLINARY BOARD

In re  
ANNE K. BLOCK  
Lawyer (Bar No. 37640)

Public No. 14#00016  
FINDINGS OF FACT, CONCLUSIONS OF  
LAW, AND HEARING OFFICER'S  
RECOMMENDATION

On July 21, 2014 a hearing was held in accordance with Rule 10.13 of the Rules for Enforcement of Lawyer Conduct (ELC). Respondent Anne K. Block appeared telephonically at the hearing *pro se*. Linda Eide, Sr. Disciplinary Counsel (Disciplinary Counsel) appeared for the Washington State Bar Association (the Association). The hearing was held at the Washington State Bar Association, 1325 Fourth Avenue, Suite 600, Seattle, Washington.

**I. FORMAL COMPLAINT**

On February 14, 2014 the Association filed a Formal Complaint charging the Respondent with three counts of violations of the Rules of Professional Conduct (RPC):

COUNT 1 – By falsely certifying that no grievance investigation was pending when she attempted to resign, the Respondent violated RPC 8.4(c).

COUNT 2 – By failing to comply with the subpoena to produce records and/or by failing to appear at the deposition to provide testimony, the Respondent violated RPC8.4(l) by violating former ELC 1.5 and former ELC 5.5(c).

COUNT 3 – By representing to disciplinary counsel that she had noted motions for January 10, 2014 when she had neither filed nor noted such motions, the Respondent violated RPC 8.4(c).

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## II. HEARING

Ms. Block had notified the association of a hearing loss and requested special accommodation at the hearing. The Association had given her several options and she chose to appear telephonically. Ms. Block answered the phone and immediately began with what she classified as an "a formal statement." She then stated there would be no hearing. The Hearing Officer began to put the introduction of the hearing on the record. The Respondent stated "this is illegal." The Respondent talked during the Hearing Officer's record and procedural history. The Hearing Officer asked the parties if there were any preliminary matters. Disciplinary counsel stated there were no preliminary matters. The Hearing Officer tried four times to interrupt the Respondent in her dialogue in order to ask her the same question. Ms. Block's comments could be clearly heard in the hearing room. Finally the Hearing Officer asked Disciplinary Counsel to begin her opening statement. At this point the volume was turned down very slightly so the court reporter could hear Disciplinary Counsel's opening statement. The Hearing Officer verified the Respondent as well as the court reporter could hear the speaker. *Record pg 32.* The Respondent spoke during Disciplinary Counsel's opening statement without pause.

The Hearing Officer then asked Ms. Block if she wanted to give an opening statement. She responded she had already given her statement that is part of the record as far as what the Washington State Bar here has done. The Hearing Officer then asked Disciplinary Counsel to begin her case. Respondent broke the connection at 9:22 a.m. The call was re-initiated to the same number that was used to initiate the hearing. A recording was reached verifying it was the correct number for the Respondent. I find the Respondent purposely discontinued the call in an effort to disrupt and/or terminate the hearing.

The hearing proceeded. Witnesses were sworn and presented testimony. Exhibits were admitted into evidence. Declarations were admitted according to ELC 10.13.

1 Having considered the evidence and argument of counsel, the Hearing Officer makes the  
2 following findings of fact, conclusions of law and recommendation.

3 **III. FINDINGS OF FACT**

4 The following facts were proven by a clear preponderance of the evidence:<sup>1</sup>

- 5 1. Respondent was admitted to the practice of law in Washington on July 10, 2006 and has  
6 no prior discipline.
- 7
- 8 2. John Pennington filed a Grievance Against a Lawyer with the Washington State Bar  
9 Association Office of Disciplinary Counsel (ODC) on May 22, 2013 alleging a pattern of  
10 harassment and intimidation against him and his family. Ex 2 He filed multiple  
11 supplemental information alleging post-grievance retaliation on May 30, 2013, June 4,  
12 2013, June 10, 2013, June 20, 2013, July 2, 2013 and July 11, 2013. Ex 3,4,6,8,9,10.
- 13 3. The Respondent filed her response to the grievance on July 10, 2013. Ex 5. She filed  
14 supplemental information on June 19, 2013, July 2, 2013, September 3, 2013,  
15 September 7, 2013 and September 16, 2013. Ex 7,11,12,13
- 16
- 17 4. On November 15, 2013 Office of Disciplinary Counsel issued a Notice of Intent to Take  
18 Deposition and Subpoena duces tecum requiring the Respondent to appear on  
19 December 6, 2013 to testify under oath and to bring certain documents regarding the  
20 Pennington grievances and the allegations made in the supplemental filings by the  
21 Respondent. Ex 15, Ex 16
- 22 5. On November 21, 2013 Office of Disciplinary Counsel affected personal service of the  
23 Notice of Intent to Take Deposition and Subpoena duces tecum by personally serving  
24 Respondent's co-resident, Noel Frederick, at 313 Shelby Street, Gold Bar, Washington.  
25 Ex 17. ELC 4.1(b)(3)(B)(i)
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28 <sup>1</sup> ELC 10.14(b)

- 1 6. On November 24, 2013 Respondent acknowledged receipt of the subpoena but stated  
2 she had not received a copy of the investigation file. Ex 19. Disciplinary counsel  
3 responded by letter dated November 26, 2013 informing the Respondent no discovery is  
4 permitted in the investigative phase per ELC 3.1 & 3.2
- 5 7. On December 3, 2013 the Respondent notified Disciplinary Counsel she would not be  
6 appearing on Friday, December 6, 2013 for the deposition since she had canceled her  
7 membership, believed the deposition and subpoena duces tecum violated her First  
8 Amendment rights and since she had resigned, the association did not have jurisdiction.  
9 Ex24
- 10 8. On December 6, 2013 Respondent did not appear for the 9:30 a.m. deposition.  
11 (Statement on the Record). Ex 31 I find the Respondent intentionally and knowingly did  
12 not appear at the scheduled deposition.
- 13 9. On December 2, 2013 Respondent attempted to resign her WSBA membership effective  
14 immediately by email and letter to WSBA, Membership Changes. Ex 21.
- 15 10. Also on December 2, 2013 Respondent sent the WSBA a notarized form entitled,  
16 Voluntary Resignation from Membership in the Washington State Bar Association,  
17 stating she intended to voluntarily resign from the WSBA. She certified "that there is no  
18 disciplinary investigation or proceeding pending against me and that I have no personal  
19 knowledge that the filing of a grievance of substance is imminent". A footnote on the  
20 form stated if there is a disciplinary investigation then pending against the member, or if  
21 the member had knowledge that the filing of a grievance of substance was imminent,  
22 resignation was permitted only under the provisions of the Rules for Enforcement of  
23 Lawyer Conduct. The Respondent added the following language to the footnote: "So  
24 long as the issue being investigated is pertains to a former client". Ex 21
- 25 11. The WSBA did not accept the Respondent's resignation. Ex 202

1 12. On December 3, 2013 Disciplinary Counsel responded that under the WSBA Bylaws, a  
2 member could not resign when any grievance is pending but that the Respondent could  
3 resign in lieu of discipline as provided in the ELC 9.3 but failing that disciplinary counsel  
4 expected to see the Respondent on December 6, 2013 for the deposition. Ex 24. The  
5 Respondent responded by stating she would seek a protective order and injunction for  
6 violation of her 1<sup>st</sup>. Amendment rights. Ex 25. The Respondent did not elect to resign  
7 under ELC 9.3. Matsamoto Declaration P.32

8  
9 13. Respondent's deposition was scheduled for December 6, 2014. On December 5, 2013,  
10 Respondent emailed disciplinary counsel that she was "filing a couple of motions today  
11 and a copy will be provided to you." Ex 27. Later Respondent emailed that she had  
12 "attached motions" and "a copy of the injunction and related motions" purportedly noted  
13 for January 10, 2014, had been mailed to disciplinary counsel. The email message  
14 included no attachments. Ex 28

15 14. On December 6, 2013 at 5:34 a.m. Disciplinary counsel emailed the Respondent  
16 that no motion was attached to her December 5, 2013 email and she expected to see  
17 her at the deposition scheduled at 9:30 a.m. that morning. Ex 29.

18  
19 15. On December 6, 2013 at 3:32 p.m. Respondent's paralegal emailed disciplinary counsel,  
20 "Ms. Block's protective order and motion for injunctive relief. A copy has been placed in  
21 the mail." One motion had a Snohomish County Superior Court caption and the other  
22 motion had a federal district court caption. Neither motion included a case number. Ex  
23 32.

24 16. The Respondent never filed either motion. The Respondent did not note either motion in  
25 either court for January 10, 2014. Ex 34. I find the Respondent intended the unfiled  
26 motions to mislead the Association and suspend the deposition and subpoena duces  
27 tecum.  
28

1 17. On January 16, 2014 the Respondent emailed her willingness to draft a protective order  
2 if the Association would stipulate to a protective order. Ex 35 Disciplinary counsel  
3 responded asking for clarification on the following day. Ex 36 On January 30, 214 the  
4 Respondent asked Disciplinary counsel for a new deposition date. Ex 41. Disciplinary  
5 counsel responded on the same day with some suggested dates and times. Ex 42 On  
6 February 14, 2014 the Respondent stated she had received no new dates for the  
7 deposition. Ex 47 Disciplinary sent another copy by email and 1<sup>st</sup>. class mail. Ex 48,  
8 49.

10 18. The Respondent never agreed to a new deposition date and the ODC never issued a  
11 new Notice of Intent to Take Deposition or Subpoena Duces Tecum. MD 32

12 19. On February 14, 2014 the Office of Disciplinary Counsel filed a Formal Complaint  
13 against the Respondent. Bar File #2

#### 14 IV. CONCLUSION OF LAW

15 Count 1 – Based on Findings of Fact 9 through 12, Respondent violated RPC 8.4(c) by  
16 engaging in conduct involving dishonesty, fraud, deceit or misrepresentation when  
17 attempting to resign from the Washington State Bar Association.  
18

19 Count 2 - Based on Findings of Fact 4 through 8, Respondent violated RPC 8.4(l) by  
20 violating a duty imposed under the Rules for Enforcement of Lawyer Conduct in connection  
21 with a disciplinary matter.

22 Count 3 - Based on Findings of Fact 13 through 18, Respondent violated RPC 8.4(c) by  
23 engaging in conduct involving dishonesty, fraud, deceit or misrepresentation when falsely  
24 notifying the Disciplinary Counsel she had filed for a protective order.  
25

#### 26 V. PRESUMPTIVE SANCTIONS

27 1. A presumptive sanction must be determined for each ethical violation. *In re Anschell*,  
28 149 Wn.2d 484, 69 P.3d 844,852 (2003). The following standards of the American Bar

1 Association's *Standards for Imposing Lawyer Sanctions* (1991 ed. & Feb. 1992 Supp.) are  
2 presumptively applicable in this case.

3 2. When multiple ethical violations are found, the "ultimate sanction imposed should at  
4 least be consistent with the sanction for the most serious instance of misconduct among a  
5 number of violation." In re Petersen, 120 Wn.2d 833, 854, 846 P.2d 1330 (1993).

6 The hearing officer should consider four factors to recommend the appropriate sanction:  
7

- 8 1) the duty violated
- 9 2) the lawyer's mental state
- 10 3) the potential or actual injury caused by the lawyer's misconduct; and,
- 11 4) the existence of aggravating or mitigating factors.

12 Count 1 - By falsely certifying that no grievance investigation was pending when she  
13 attempted to resign, the Respondent violated RPC 8.4(c).

14 a. Duty violated.

15 The Respondent violated a duty to maintain the integrity of the profession and a duty to  
16 the general public by engaging in conduct involving dishonesty, fraud or to interfere with the  
17 administration of justice by falsifying information on the form to resign. The public expects a  
18 lawyer to exhibit high standards of honesty and integrity.

19 b. Mental state.

20 A lawyer breaches an ethical duty knowingly when the lawyer acts with conscious  
21 awareness of the nature or attendant circumstances of her conduct but without a conscious  
22 objective to accomplish a particular result. A lawyer acts intentionally when the Lawyer acts  
23 with the conscious objective or purpose to accomplish a particular result. In this matter I find  
24 Respondent acted intentionally by adding specific language to negate the restriction of having  
25 no grievance pending in order to maintain she had resigned from the Association.

26 c. Potential or Actual Injury caused.  
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1 Respondent used the fiction of having resigned from the Association to avoid the Notice  
2 of Deposition and Subpoena duces tecum. The grievant, Mr. Pennington set forth his  
3 grievances and the Respondent replied with a multitude of allegations against him and his  
4 family. The Respondent had no intention of testifying in a deposition or answering  
5 interrogatories regarding the allegations she made against the Grievant and others. Lawyers  
6 are officers of the court and held to the highest ethical standards. The public is entitled to a fair  
7 and candid investigation into allegation of lawyer misconduct and without that candid  
8 investigation the public questions the integrity of the entire legal system.  
9

10 d. Presumed Sanction –

11 The presumed sanction for an intentional violation of 8.4(c) by engaging in the dishonest  
12 misrepresentation of Respondent's certification to resign from the Washington State Bar  
13 Association is disbarment under 5.11(b)<sup>2</sup>, because, as in this case, the misconduct seriously  
14 adversely reflects on the lawyer's fitness to practice law.  
15

16 Count 2 - By failing to comply with the subpoena to produce records and by failing to  
17 appear at the deposition to provide testimony, the Respondent violated RPC 8.4(l) by violating  
18 former ELC 1.5 and former ELC 5.5(c).

18 a. Duty violated –

19 Respondent violated a duty to maintain the integrity of the profession imposed by former  
20 ELC 1.5 and former ELC 5.5(c) by failing to comply with the duty to produce records and by  
21 failing to appear at a deposition set according to ELC 5.5. This prevented the Association from  
22 investigating an active grievance and responding to the serious concerns of a member of the  
23 public which is a violation of 8.4(l).  
24

25 b. Mental state.

26 Respondent represented to the Association she had filed a protective order in state and  
27 federal court in order to intentionally avoid the deposition and subpoena scheduled for  
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<sup>2</sup> ABA Standards for Imposing Lawyer Sanctions



1 December 6, 2013. The Respondent had made specific allegations against the Grievant and  
2 others and demonstrated no intention of substantiating those claims.

3 c. Potential or actual injury.

4 The practice of law is a self-governed profession. A lawyer must abide by rules and  
5 procedure contained in the RPC which shape the administration of justice in this state and instill  
6 confidence in the legal system for other lawyers and the public. Respondent refused to abide  
7 by this rule yet noted up several depositions and issued subpoena duces tecum of her own  
8 causing actual injury to the profession.

9 d. Presumptive sanction.

10 The presumptive sanction for an intentional violation of RPC 8.4(l) is disbarment under  
11 7.1<sup>3</sup>.

12 Count 3 – By misrepresenting to disciplinary counsel that she had noted motions for  
13 January 10, 2014 when she had neither filed nor noted such motions, the Respondent violated  
14 RPC 8.4(c).

15 a. Duty violates.

16 Respondent failed to meet the expectations of the legal professional by engaging in  
17 deceitful conduct by falsely representing she had noted motions for protective orders to quash  
18 the subpoena and deposition, a violation of RPC 8.4(c).

19 b. Mental state.

20 Respondent intentionally sent completed but not noted or filed motion for protective  
21 orders in both state and federal courts on the day of the scheduled deposition. She purposely  
22 did not appear as required. The respondent acted in her own interests and without regard to the  
23 honesty and candor owed by a Lawyer to the professional.

24 c. Potential or actual injury caused.

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28 <sup>3</sup> id

1 John Pennington filed a grievance against a lawyer practicing in the state of Washington.  
2 Respondent spent the next months responding to the grievant with professional and personal  
3 attacks against him and his family. She was asked by the Association to verify her responses  
4 and refused to do so by feigning legal documents to deny further investigation. These actions  
5 cause serious harm to the legal system in general and to Mr. Pennington specifically. It is my  
6 opinion Respondent did actual harm to this grievant and the investigation and this constitutes  
7 the most serious of the charges in this matter.  
8

9 d. Presumptive sanction.

10 The presumptive sanction for intentionally violating RPC(c) is disbarment as outlined in  
11 5.11(b)<sup>4</sup>

12 Also, or in the alternative, In re Disciplinary Proceeding Against Whitt, 149 Wn.2d 707,  
13 719, 72 P.3d 173 (2003), applies ABA Standard 7.0 when, as in this case, the lawyer engages  
14 in dishonest conduct to circumvent the disciplinary process. Under this analysis the  
15 presumptive sanction is disbarment under ABA Standard 7.1. The benefit the Respondent  
16 hoped to obtain was escaping any potential sanction. Lawyer intransigence and stonewalling  
17 that prevents uncovering wrongdoing and protecting the public, threatens lawyer self-regulation  
18 and merits disbarment. In re Disciplinary Proceeding Against Scannel, 169 Wn.723, 745, 239  
19 P.3d 332 (2010).  
20

21 Based on the Findings of Fact and Conclusions of Law and application of the ABA  
22 Standards, the appropriate presumptive sanction is disbarment.

23 3. Existence of aggravating or mitigating factors.

24 I find the following matters are aggravating factors:

25 A. Bad faith obstruction of the disciplinary proceeding.  
26  
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28 <sup>4</sup> id

- 1 • On March 18, 2014 the Hearing Officer advised the Respondent that she “cannot  
2 accept exparte communication of any kind.” Ex 59 Despite this directive from  
3 the Hearing Officer, the Respondent persisted in sending emails to the Hearing  
4 Officer. See Matsumoto Declaration Sec.40,41. In another email, the  
5 Respondent admitted that she had attempted to call the Hearing Officer 25 times  
6 in one week. Ex 146. I find Respondent’s continued attempts of exparte  
7 communication with a hearing officer despite an explicit order to the contrary are  
8 an intentional bad faith obstruction of the disciplinary proceeding.
- 9 • On April 9, 2014, the Clerk served the Hearing Officer’s Notice of Scheduling  
10 Conference set for April 23, 2014. BF 32. On April 22, 2014 the Respondent  
11 emailed the Clerk, Hearing Officer and Disciplinary Counsel that she had an  
12 “expedited administrative hearing” the next morning and would not be available  
13 for the scheduling conference. BF 37. The Hearing Officer reset the scheduling  
14 conference for May 7, 2014. BF 38. On April 25, 2014 the Respondent emailed  
15 the Hearing Officer and the Clerk that she was out-of-state in a remote place but  
16 would try to get to an area with available cell service for the scheduling  
17 conference. BR 39. On May 6, 2014 the Respondent emailed the Hearing  
18 Officer, Clerk and disciplinary counsel that she was “out of the state on business  
19 and will more than likely be available via telephone after 11 a.m. CST. Ex 74.  
20 On May 7, 2014 the Hearing Officer entered a second continuance of the  
21 scheduling conference noting that the number listed with the WSBA was not a  
22 working number and the Respondent did not answer the 206-326-9933 number  
23 listed on previous pleadings. The scheduling conference was reset for May 20,  
24 2014 with the provision there would be no additional continuances. BF 45. On  
25 May 19, 2014 the Respondent emailed the Hearing Officer and disciplinary  
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1 counsel to set conditions for her participation in the scheduling conference. Ex 77  
2 On May 20, 2104 the Hearing Officer could not reach the Respondent at the  
3 number she had provided and set the hearing for July 21, 2014. BF 47. On May  
4 26, 2014 the Respondent emailed the Hearing Officer that she would be "coming  
5 for your telephone records." Ex 80. I find the Respondent's repeated delay of  
6 the scheduling conference as well as her failure to appear at the telephonic  
7 hearing constitutes a bad faith obstruction of the disciplinary proceeding.

- 8
- 9 • The Respondent insisted throughout these proceedings that no hearings will be  
10 recorded despite disciplinary counsel's explanation that all hearings are required  
11 to be recorded as set forth in ELC 10.13(d). Ex 84,86,87,169,170,182,201
- 12 • Respondent filed volumes of documents unrelated to the pending charges set  
13 forth in the formal complaint. These documents set forth accusations and  
14 information regarding the grievant and his family, Snohomish County officials and  
15 officials from the city of Gold Bar. Ex 90, 92, 94, 96, 97, 98, 99, 102,100,103-  
16 109,115,126,130,133,150,154,157,171,188 The Respondent filed no  
17 supporting documents in defense of the allegations set forth in the Formal  
18 Complaint. I find the Respondent attempted to overwhelm and mislead the  
19 disciplinary process as well as use the disciplinary forum to make accusations  
20 against the grievant and others she had no intention of substantiating.
- 21
- 22 • On May 29, 2014 Respondent emailed the Hearing Officer, disciplinary counsel  
23 and Sean Reay from the Snohomish County Prosecutor's Office regarding her  
24 plans to depose the grievant. EX87. In February 2014, the Respondent filed suit  
25 against the City of Gold Bar, the grievant and others in United States District  
26 Court for the Western District of Washington under Case No. 14cv00235 RAJ,  
27 Block v Snohomish County et. Al., alleging 42 USC 1983 violations. See BF 67.  
28

1 Using the disciplinary proceeding cause number, the Respondent served a  
2 Notice of Intent to Take Deposition of John Pennington and Subpoena Duces  
3 Tecum on the Snohomish County Auditor. Ex 96. The Respondent did not seek  
4 Hearing Officer approval for such discovery as required by ELC 10.11(c).  
5 Matsumoto Declaration Sec. 44. Disciplinary counsel moved for a protective  
6 order which was granted. BF 53, 56. I find the Respondent used the disciplinary  
7 cause number to schedule a deposition without using the mandatory discovery  
8 procedures under the ELC and based on its timing for use in another legal  
9 matter.  
10

- 11 • The Respondent continued to attempt to engage the Hearing Officer in exparte  
12 communication. Ex 86. In late May 2014 she began emailing the Hearing Officer  
13 with "evidence" or "exhibits." Ex 90. The May 22, 2014 scheduling order, BF  
14 #47, page 2 specifically prohibited the parties from transmitting exhibits to the  
15 Hearing Officer. The Respondent continued to do so. Matsumoto Declaration  
16 Sec 41. On June 1, 2014 disciplinary counsel emailed the Respondent to  
17 remind her that the scheduling order specifically prohibited sending exhibits to  
18 the hearing officer. Ex 120. By this time the Respondent had sent about two  
19 dozen such emails. Ex 87, 90, 94, 95, 97-110, 113-119. The Respondent  
20 persisted and sent dozens more such emails. Ex 121, 122, 125, 126, 133-141,  
21 145, 150, 151, 154, 155, 157-161, 163, 164, 166, 168-171, 176, 177, 179, 182-  
22 186, 189-192, 194 and 195. I find the exparte transmittal of exhibits and other  
23 emails without following the proper procedure was a deliberate attempt to  
24 obstruct the disciplinary process.  
25

26 B. Dishonest or selfish motive.  
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1 John Pennington, the grievant, filed a complaint. The Respondent made multiple  
2 allegations against him and many others. She attempted to obstruct the disciplinary process  
3 repeatedly as set forth above. She refused to respond directly to the allegations made in the  
4 formal complaint, BF 16. instead diverting her issues to the grievant, Snohomish County  
5 officials, WSBA staff, ODC staff, the Hearing Officer, the Chief Hearing Officer and City of Gold  
6 Bar officials. I find the Respondent never intended to be held accountable for the original  
7 allegations made against her by the Grievant and for the obstruction to the disciplinary process.  
8 I find the Respondent's actions in this matter to be intentional and to show a profound disregard  
9 for the basic principles of the legal system and of the level of skill and professionalism expected  
10 of Lawyers and deserved by the people of the state of Washington.

12 C. Multiple charges.

13 The formal complaint alleged three violations of RPC 8.4. I find these three charges  
14 were proven by a clear preponderance of the evidence.

15 D. Failure to acknowledge the wrongful nature of her conduct.

- 16 • The Respondent has admitted no wrong in this action. She has personally  
17 attacked the WSBA and Linda Eide, Disciplinary Counsel. Ex 18, 88, 126, 135,  
18 140, 153, 186, 190. The Respondent has threatened Linda Eide Ex 158, 159,  
19 164, 176, 177 and Julie Shankland, Assistant General Counsel Ex 175. She has  
20 threatened Allison Sato with criminal action. Ex 193, 204. I find the  
21 Respondent's accusations and threats against the WSBA and its employees  
22 extremely unprofessional. The Respondent has never acknowledged any  
23 wrongdoing. She has exhibited no remedial action in this matter but instead has  
24 personally and professionally attacked WSBA employees.
- 25 • The Respondent has shown profound disrespect for the WSBA, disciplinary  
26 counsel, Association staff and this Hearing Officer throughout this proceeding.  
27  
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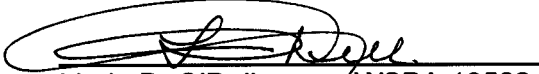
1 She has been accusatory and sarcastic. Her use of extreme foul language and  
2 threats is unprecedented to this writer. Ex 175, 193, 203. The Respondent has  
3 throughout, as set forth in this findings, conclusion and recommendations shown  
4 a complete lack of respect for the policy and procedures set forth by the legal  
5 profession and the publics' expectations for professional attorneys in the state of  
6 Washington.  
7

8 The only mitigating factor is the absence of a prior disciplinary offense.

9 VI. RECOMMENDED SANCTION

10 I recommend disbarment.

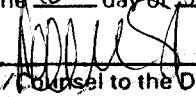
11 Dated this 6<sup>th</sup>. Day of September, 2014.

12  
13   
14 Linda D. O'Dell, WSBA 19582  
15 Hearing Officer  
16  
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18 CERTIFICATE OF SERVICE

19 I certify that I caused a copy of the PDF, LOL & HO's Recommendation  
20 to be delivered to the Office of Disciplinary Counsel and to be mailed  
21 to Anne Block Respondent/Respondent's Counsel  
22 at 312 Shelby St. 4th floor, WA 98101, by certified/first class mail,  
23 postage prepaid on the 10th day of September, 2014

24 And sent via email:  
25 anne.k.wozke@comcast.net

26   
27 Clerk/Counsel to the Disciplinary Board  
28