

Apr 30 2018

Disciplinary Board

Docket # 025

BEFORE THE DISCIPLINARY BOARD OF THE WASHINGTON STATE BAR ASSOCIATION

Notice of Reprimand

Lawyer Queta Romero, WSBA No. 38986, has been ordered Reprimanded by the following attached documents: Order on Stipulation to Two Reprimands and Stipulation to Two Reprimands.

WASHINGTON STATE BAR ASSOCIATION

Kevin Bank Counsel to the Disciplinary Board

CERTIFICATE OF SERVICE

I certify that I caused a copy of the Notice of Reprimand to be delivered to the Office of Disciplinary Counsel and to be mailed to Anne Selzer Respondent/Non-Respondent's Counsel at 1317 Queen Anne Ave #311 Seattle WA 98109 Certified/first class mail postage prepaid on the 30th day of April 2018

Clerk/Counsel to the Disciplinary Board

FILED
APR 11 2018
DISCIPLINARY
BOARD

BEFORE THE
DISCIPLINARY BOARD
OF THE
WASHINGTON STATE BAR ASSOCIATION

In re

Queta Romero,
Lawyer (Bar No. 38986).

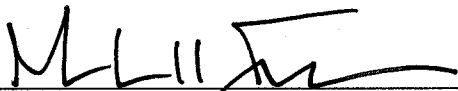
Proceeding No. 16#00092

ORDER ON STIPULATION TO TWO
REPRIMANDS

On review of the Stipulation to Two Reprimands dated March 28, 2018, and the documents on file in this matter,

IT IS ORDERED that the Stipulation to Two Reprimands is approved.

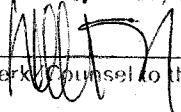
Dated this 9th day of April, 2018.



Marshall L. Ferguson
Hearing Officer

CERTIFICATE OF SERVICE

I certify that I caused a copy of the Order on Stipulation to Two Reprimands
to be delivered to the Office of Disciplinary Counsel and to be mailed
to Time Server ~~Responsible/Responsible Counsel~~
at 1017 Queen Anne Avenue SE, Seattle, WA 98104 Certified first class mail
postage prepaid on the 21st day of April, 2018



Clerk of Counsel to the Disciplinary Board

FILED
APR 11 2018
DISCIPLINARY
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BEFORE THE
DISCIPLINARY BOARD
OF THE
WASHINGTON STATE BAR ASSOCIATION

In re
QUETA ROMERO,
Lawyer (Bar No. 38986).

Proceeding No. 16#00092
ODC File No(s). 16-00041 and 16-00921
STIPULATION TO TWO REPRIMANDS
Following settlement conference conducted
under ELC 10.12(h)

Under Rule 9.1 of the Rules for Enforcement of Lawyer Conduct (ELC), and following a settlement conference conducted under ELC 10.12(h), the following Stipulation to Two Reprimands is entered into by the Office of Disciplinary Counsel (ODC) of the Washington State Bar Association (Association) through disciplinary counsel Francesca D'Angelo, Respondent's Counsel Anne I. Seidel and Respondent lawyer Queta Romero.

Respondent understands that she is entitled under the ELC to a hearing, to present exhibits and witnesses on her behalf, and to have a hearing officer determine the facts, misconduct and sanction in this case. Respondent further understands that she is entitled under the ELC to appeal the outcome of a hearing to the Disciplinary Board, and, in certain cases, the Supreme Court. Respondent further understands that a hearing and appeal could result in an

DM

1 outcome more favorable or less favorable to her. Respondent chooses to resolve this proceeding
2 now by entering into the following stipulation to facts, misconduct and sanction to avoid the
3 risk, time, expense and publicity attendant to further proceedings.

4 I. ADMISSION TO PRACTICE

5 1. Respondent was admitted to practice law in the State of Washington on June 19,
6 2007.

7 II. STIPULATED FACTS

8 A. Partida-Nunez Representation

9 2. In or around 1990, Adan Partida-Nunez entered the United States without inspection.

10 3. Mr. Partida-Nunez's father, a lawful permanent resident, filed a petition for an alien
11 relative (I-130 petition) on behalf of Mr. Partida-Nunez.

12 4. The petition was approved and Mr. Partida-Nunez was given a priority date of
13 February 7, 1992.

14 5. In 2009, Mr. Partida-Nunez was arrested and placed in removal proceedings. Mr.
15 Partida-Nunez hired lawyer Antonio Salazar to represent him.

16 6. Mr. Salazar submitted an Application for Cancellation of Removal And Adjustment
17 of Status for Certain Non-Permanent Residents.

18 7. On May 12, 2010, Mr. Salazar was disbarred.

19 8. On or about July 23, 2010, Mr. Partida-Nunez hired Respondent to represent him.

20 9. On August 5, 2010, Respondent filed an Employment Authorization application on
21 Mr. Partida-Nunez's behalf.

22 10. The United States Customs and Immigration Service (USCIS) issued a notice of
23 intent to deny the application because additional documentation was needed.

1 11. USCIS allowed Respondent 30 days to submit the requested documents.
2 12. Because Respondent made the request on the wrong basis, not all of the requested
3 documents existed. Mr. Partida-Nunez's application for employment authorization was denied.
4 13. On October 27, 2010, the immigration court held a Master Calendar Hearing.
5 14. Respondent asked the court to set the matter over to another Master Calendar
6 Hearing so that she could update the court on Respondent's application to adjust status.
7 15. The court continued the Master Calendar Hearing to August 3, 2011.
8 16. The court requested the Respondent bring a brief regarding Mr. Partida-Nunez's
9 eligibility for cancellation of removal to the next hearing.
10 17. In March 2011, Mr. Partida-Nunez received a notice from the National Visa Center
11 stating his father's I-130 petition was canceled due to Mr. Partida-Nunez's failure to apply for
12 an immigrant visa within one year of being advised of his eligibility to do so.
13 18. The notice stated that Mr. Partida-Nunez's I-130 petition could be revalidated if he
14 established that his failure to apply for an immigrant visa was due to circumstances beyond his
15 control.
16 19. Mr. Partida-Nunez gave the notice to Respondent.
17 20. Respondent did not request Mr. Partida-Nunez's I-130 petition be revalidated.
18 Respondent asserts that she did not do so because she was not aware of any basis to do so.
19 21. Respondent did not send Mr. Partida-Nunez a letter regarding his August 3, 2011
20 court date.
21 22. On August 3, 2011, neither Respondent nor Mr. Partida-Nunez appeared at the
22 hearing. Mr. Partida-Nunez was ordered removed in absentia.
23 23. Respondent filed a motion to re-open, which was granted.

1 24. The court set another Master Calendar Hearing for September 14, 2011.

2 25. Respondent appeared for the hearing but failed to file a brief regarding Mr. Partida-
3 Nunez's eligibility for cancellation of removal as requested by the court.

4 26. The immigration court precluded Respondent from presenting a brief in support of
5 Mr. Partida-Nunez's eligibility for cancellation of removal.

6 27. The next hearing was on December 6, 2011. Respondent did not provide the court
7 with documents to support Mr. Partida-Nunez's adjustment of status application.

8 28. The case was continued to February 6, 2013 to allow Respondent another
9 opportunity to provide the court with documents to support Mr. Partida-Nunez's adjustment of
10 status application. The court warned Respondent that if she did not have the documents by the
11 next hearing, it may have to deny the application for failure to prosecute.

12 29. In or around May 2012, the National Visa Center sent Mr. Partida-Nunez a final
13 termination notice, stating that the record of the I-130 petition approved on his behalf had been
14 destroyed and thus, he had lost his priority date.

15 30. Because Mr. Partida-Nunez's father's I-130 petition had been canceled, Mr. Partida-
16 Nunez was no longer able to proceed on his petition for an adjustment of status.

17 31. On January 8, 2013, Respondent filed another I-130 petition for Mr. Partida-Nunez's
18 father on behalf of Mr. Partida-Nunez.

19 32. At the February 6, 2013 hearing, Respondent informed the immigration court that
20 Mr. Partida-Nunez's prior I-130 petition had been canceled and requested a continuance to
21 allow the new I-130 to be processed.

22 33. The court continued the matter to November 8, 2013 and instructed Respondent to
23 bring an original application for adjustment of status and a waiver application. The court

1 cautioned that if she did not provide a waiver application, the Court would find Mr. Partida-
2 Nunez ineligible for adjustment of status.

3 34. At the November 8, 2013 hearing, the court told Respondent that, due to changes in
4 the law, Mr. Partida-Nunez was eligible to apply for cancellation of removal, notwithstanding
5 his criminal history. Ms. Romero informed the court that Mr. Partida-Nunez wanted to submit a
6 new application for cancellation of removal.

7 35. The matter was continued to July 17, 2014 to allow Mr. Partida-Nunez to submit his
8 cancellation of removal case.

9 36. On November 25, 2013, USCIS advised Respondent that Mr. Partida-Nunez's new I-
10 130 petition was insufficient to establish his eligibility. USCIS requested Respondent to
11 provide additional information within 87 days.

12 37. Respondent did not provide additional information to USCIS.

13 38. USCIS denied Mr. Partida-Nunez's new I-130 petition.

14 39. At the July 17, 2014 hearing, Respondent advised the court that Mr. Partida-Nunez's
15 I-130 application had been denied and that she would have to file the I-130 petition again.

16 40. Respondent also advised the court that she would not be submitting a cancellation of
17 removal application. Respondent asserts that she did so because she did not believe that Mr.
18 Partida-Nunez was eligible for cancellation of removal.

19 41. The court determined that since Mr. Partida did not have a pending I-130 petition, he
20 was ineligible to proceed with an application for adjustment of status. Respondent requested
21 that the court close the matter administratively. The court held a hearing on Respondent's
22 request for administrative closure, denied administrative closure, and ordered that Mr. Partida-
23 Nunez be removed.

1 **B. Caballero-Reves Representation**

2 42. David Caballero-Reyes (Mr. Caballero-Reyes) is a Mexican national.

3 43. In or around 1981, Mr. Caballero-Reyes entered the United States and gained status
4 as a lawful permanent resident.

5 44. In or around 1991, Mr. Caballero-Reyes was convicted of assault with a deadly
6 weapon in Ontario, California.

7 45. In or around May 2012, Mr. Caballero-Reyes was placed into removal proceedings.

8 46. In July 2012, Mr. Caballero-Reyes hired Respondent.

9 47. On April 23, 2014, Respondent and Mr. Caballeros-Reyes appeared for a Master
10 Calendar Hearing. The court set Mr. Caballero-Reyes' matter over to a Master Calendar
11 hearing on November 5, 2014.

12 48. At the November 5, 2014 hearing, Respondent informed the court that Mr.
13 Caballero-Reyes was going to seek asylum, withholding of removal, and relief under Article 3
14 of the United Nations Convention against Torture.

15 49. Respondent also told the court that an I-130 application (petition for alien relative)
16 and other waivers would be filed for Mr. Caballero-Reyes. The court advised Respondent that a
17 brief would be needed addressing Mr. Caballero's conviction and eligibility for certain waivers.
18 The court advised Respondent to bring a receipt for the filed I-130 petition to the next hearing.

19 50. The court set another Master Calendar hearing for August 26, 2015. By notice dated
20 June 17, 2015, the court rescheduled the hearing to July 22, 2015.

21 51. Respondent did not file an I-130 petition and had no receipt for the court.

22 52. Respondent provided no briefing for the court.

23 53. The court denied Mr. Caballero-Reyes' application for asylum, application for

1 withholding of removal, and relief pursuant to Article 3 of the United Nations Conventions
2 Against Torture for failure to prosecute.

3 54. The court ordered that Mr. Caballero-Reyes be removed to Mexico.

4 55. After the July 22, 2015 hearing, Respondent told Mr. Caballero-Reyes that he could
5 file an appeal. She did not inform him that he may have a claim against her or the basis for a
6 motion to re-open based on her ineffective assistance in failing to provide documents in support
7 of his claims.

8 56. On or about July 26, 2015, Respondent filed an appeal with the Board of
9 Immigration Appeals (BIA) that stated as grounds "an abuse of discretion by the IJ
10 [Immigration Judge] in denying all applications for relief."

11 57. The deadline for filing Mr. Caballero-Reyes' appeal brief was November 24, 2015.

12 58. Respondent received notice of the November 24th deadline on November 27, 2015.

13 59. Respondent did not file Mr. Caballero-Reyes' brief until November 30, 2015.

14 60. The BIA rejected the brief as untimely and provided instructions for filing a late
15 brief.

16 61. Respondent did not attempt to resubmit Mr. Caballero-Reyes' brief.

17 62. Respondent asserts that she believed that she could not re-submit Mr. Caballero's
18 brief because her brief had contained a request that the BIA accept it as a late filing.

19 63. The BIA dismissed Mr. Caballero-Reyes' appeal stating that the notice of appeal did
20 not contain statements that meaningfully apprised the Board of specific reasons underlying the
21 challenge to the immigration judge's decision and that no brief was filed.

22 **C. Non-cooperation**

23 64. On June 14, 2016, lawyer Andrew James White filed a grievance against Respondent

1 regarding her conduct in Mr. Caballero-Reyes' case.

2 65. On June 16, 2016, ODC sent Respondent a copy of Mr. White's grievance along
3 with a request to provide a written response.

4 66. Respondent did not provide ODC a written response to Mr. White's grievance.

5 67. On July 20, 2016, ODC sent Respondent a 10-day letter requesting a written
6 response by August 2, 2016.

7 68. Respondent did not provide ODC a written response by August 2, 2016.

8 69. On August 3, 2016, ODC issued a subpoena setting Respondent's deposition for
9 August 17, 2016.

10 70. On August 5, 2016, the subpoena was personally served on Respondent.

11 71. Respondent did not appear for her deposition on August 17, 2016. The deposition
12 was rescheduled and later cancelled after counsel for Respondent submitted a response.

13 III. STIPULATION TO MISCONDUCT

14 72. By failing to act with reasonable diligence and promptness in representing Mr.
15 Partida-Nunez, Respondent violated RPC 1.3.

16 73. By failing to act with reasonable diligence and promptness in representing Mr.
17 Caballero-Reyes, Respondent violated RPC 1.3.

18 74. By failing to explain matters to Mr. Caballero-Reyes to the extent reasonably
19 necessary to make informed decisions regarding the representation, Respondent violated RPC
20 1.4(b).

21 75. By failing to provide a prompt written response to Mr. White's grievance when
22 requested and/or by failing to appear for her deposition, Respondent violated ELC 5.3(f), ELC
23 5.5(d), ELC 1.5, RPC 8.1(b), and RPC 8.4(I).

1 IV. PRIOR DISCIPLINE

2 76. Respondent has no prior discipline in Washington.

3 V. APPLICATION OF ABA STANDARDS

4 77. The following American Bar Association Standards for Imposing Lawyer Sanctions
5 (1991 ed. & Feb. 1992 Supp.) apply to this case:

6 4.4 *Lack of Diligence*

7 Absent aggravating or mitigating circumstances, upon application of the factors set out
8 in Standard 3.0, the following sanctions are generally appropriate in cases involving a failure to
act with reasonable diligence and promptness in representing a client:

9 4.41 Disbarment is generally appropriate when:

- 10 (a) a lawyer abandons the practice and causes serious or potentially serious
injury to a client; or
11 (b) a lawyer knowingly fails to perform services for a client and causes
serious or potentially serious injury to a client; or
12 (c) a lawyer engages in a pattern of neglect with respect to client matters and
causes serious or potentially serious injury to a client.

13 4.42 Suspension is generally appropriate when:

- 14 (a) a lawyer knowingly fails to perform services for a client and causes
injury or potential injury to a client, or
15 (b) a lawyer engages in a pattern of neglect and causes injury or potential
injury to a client.

16 4.43 Reprimand is generally appropriate when a lawyer is negligent and does not act
17 with reasonable diligence in representing a client, and causes injury or potential
injury to a client.

18 4.44 Admonition is generally appropriate when a lawyer is negligent and does not act
19 with reasonable diligence in representing a client, and causes little or no actual or
potential injury to a client.

20 7.0 *Violations of Duties Owed as a Professional*

21 Absent aggravating or mitigating circumstances, upon application of the factors set out
22 in Standard 3.0, the following sanctions are generally appropriate in cases involving false or
misleading communication about the lawyer or the lawyer's services, improper communication
23 of fields of practice, improper solicitation of professional employment from a prospective client,
unreasonable or improper fees, unauthorized practice of law, improper withdrawal from
representation, or failure to report professional misconduct.

24 Stipulation to Discipline
Page 9

OFFICE OF DISCIPLINARY COUNSEL OF THE
WASHINGTON STATE BAR ASSOCIATION
1325 4th Avenue, Suite 600
Seattle, WA 98101-2539
(206) 727-8207

1 7.1 Disbarment is generally appropriate when a lawyer knowingly engages in
2 conduct that is a violation of a duty owed as a professional with the intent to
3 obtain a benefit for the lawyer or another, and causes serious or potentially
serious injury to a client, the public, or the legal system.

4 7.2 Suspension is generally appropriate when a lawyer knowingly engages in
5 conduct that is a violation of a duty owed as a professional and causes injury or
potential injury to a client, the public, or the legal system.

6 7.3 Reprimand is generally appropriate when a lawyer negligently engages in
7 conduct that is a violation of a duty owed as a professional and causes injury or
potential injury to a client, the public, or the legal system.

8 7.4 Admonition is generally appropriate when a lawyer engages in an isolated
9 instance of negligence that is a violation of a duty owed as a professional, and
causes little or no actual or potential injury to a client, the public, or the legal
10 system.

11 **A. Partida-Nunez Representation**

12 78. With respect to the misconduct relating to the representation of Mr. Partida-Nunez,
13 ODC asserts that Ms. Romero acted knowingly. Respondent asserts that she acted negligently.
14 Both parties agree there was a pattern of neglect.

15 79. There was injury to Mr. Partida-Nunez.

16 80. The presumptive sanction under ABA Standard 4.4 is suspension.

17 **B. Caballero-Reves Representation**

18 81. With respect to the misconduct related to the representation of Mr. Caballero-
19 Reyes's, ODC asserts that Ms. Romero acted knowingly. Respondent asserts that she acted
20 negligently. Both parties agree there was a pattern of neglect.

21 82. There was injury to Mr. Caballero-Reyes.

22 83. The presumptive sanction under ABA Standard 4.4 is suspension.

23 **C. Non-cooperation**

24 84. Ms. Romero acted knowingly in failing to respond to Mr. White's grievance and in
Stipulation to Discipline

1 failing to attend her deposition.

2 85. There was injury to the lawyer discipline system.

3 86. The presumptive sanction under ABA Standard 7.0 is suspension.

4 **D. Aggravating/Mitigating Factors**

5 87. The following aggravating factors apply under ABA Standard 9.22:

6 (d) multiple offenses.

7 88. The following mitigating factors apply under ABA Standard 9.32:

8 (a) absence of a prior disciplinary record;

9 (c) personal or emotional problems;

10 (f) inexperience in the practice of law [Ms. Romero was admitted to practice
in June 2007. At the time of the misconduct in Mr. Partida-Nunez's
matter, she had been in practice for less than 5 years]; and

11 (l) remorse.

12 89. The mitigating factors support a departure from the presumptive sanction to
reprimand.

13 **VI. STIPULATED DISCIPLINE**

14 90. The parties stipulate that Respondent shall receive two reprimands for her conduct.

15 91. Respondent will be subject to probation for a period of two years beginning when
16 this stipulation receives final approval.

17 92. The conditions of probation are set forth below. Respondent's compliance with
18 these conditions shall be monitored by the Probation Administrator of the Office of Disciplinary
19 Counsel ("Probation Administrator"). Failure to comply with a condition of probation listed
20 herein may be grounds for further disciplinary action under ELC 13.8(b).

21 93. Respondent agrees to comply with the conditions in the Confidential Attachment.
22 Upon approval of this stipulation, this attachment will be filed under seal with this stipulation.
23

1 Practice Monitor

2 94. During the period of probation, Respondent's practice will be supervised by a
3 practice monitor as follows.

- 4 a) The practice monitor must be a WSBA member with no record of public discipline
5 and who is not the subject of a pending public disciplinary proceeding.
- 6 b) The role of the practice monitor is to consult with and provide guidance to
7 Respondent regarding case management, office management, and avoiding
8 violations of the Rules of Professional Conduct, and to provide reports and
9 information to the Probation Administrator regarding Respondent's compliance
10 with the terms of probation and the RPC. The practice monitor does not represent
11 the Respondent.
- 12 c) At the beginning of the probation period, the Probation Administrator will select a
13 lawyer to serve as practice monitor for the period of Respondent's probation.
- 14 1. Initial Challenge: If, within 15 days of the written notice of the selection of
15 a practice monitor, Respondent sends a written request to the Probation
16 Administrator that another practice monitor be selected, the Probation
17 Administrator will select another practice monitor. Respondent need not
18 identify any basis for this initial request.
- 19 2. Subsequent Challenges: If, after selection of a second (or subsequent)
20 practice monitor, Respondent believes there is good cause why that
21 individual should not serve as practice monitor, Respondent may, within 15
22 days of notice of the selected practice monitor, send a written request to the
23 Probation Administrator asking that another practice monitor be selected.
That request must articulate good cause to support the request. If the
Probation Administrator agrees, another practice monitor will be selected. If
the Probation Administrator disagrees, the Office of Disciplinary Counsel
will submit its proposed selection for practice monitor to the Chair of the
Disciplinary Board for appointment pursuant to ELC 13.8(a)(2), and will
also provide the Chair with the Respondent's written request that another
practice monitor be selected.
- 24 d) In the event the practice monitor is no longer able to perform his or her duties, the
Probation Administrator will select a new practice monitor at his or her discretion.
- e) During the period of probation, Respondent must cooperate with the named practice
monitor. Respondent must meet with the practice monitor at least once per month.
Respondent must communicate with the practice monitor to schedule all required
meetings. In the event that Respondent has no current clients and no issues with past
clients, the practice monitor may make a determination about whether a meeting

1 will be held. Meetings may be in person or by telephone at the practice monitor's
2 discretion.

- 3 f) The Respondent must bring to each meeting (or provide in advance if the meeting is
4 by telephone) a current, complete written list of all pending client legal matters
5 being handled by the Respondent. The list must identify the current status of each
6 client matter and any problematic issues regarding each client matter. The list may
7 identify clients by using the client's initials rather than the client's name.
- 8 g) At each meeting, the practice monitor will discuss with Respondent practice issues
9 that have arisen or are anticipated. In light of the conduct giving rise to the
10 imposition of probation, ODC recommends that the practice monitor and
11 Respondent discuss: whether Respondent is diligently making progress on each
12 client matter, whether Respondent is in communication with each client, whether
13 Respondent has promptly billed each client, whether Respondent's fee agreements
14 are consistent with the RPC and are understandable to the client, and whether
15 Respondent needs to consider withdrawing from any client matters. The practice
16 monitor will also discuss with Respondent any issues related to the closure of her
17 practice. The practice monitor uses discretion in determining the length of each
18 meeting.
- 19 h) Two weeks prior to any hearing in which Respondent is the attorney of record, the
20 practice monitor will meet with Respondent and discuss her plan for the hearing
21 including witnesses to be called, evidence to be presented and any briefing that
22 needs to be filed in the case. Other than for asylum hearings, the practice monitor
23 shall be present for the hearing.
- 24 i) The practice monitor will provide the Probation Administrator with quarterly
written reports regarding Respondent's compliance with probation terms and the
RPC. Each report must include the date of each meeting with Respondent, a brief
synopsis of the discussion topics, and a brief description of any concerns the
practice monitor has regarding the Respondent's compliance with the RPC. If, in
any quarter, a meeting has not been held, the practice monitor will include the
reasons why the meeting has not been held. The report must be signed by the
practice monitor. Each report is due within 30 days of the completion of the
quarter.
- j) If the practice monitor believes that Respondent is not complying with any of her
ethical duties under the RPC or if Respondent fails to schedule or attend a monthly
meeting, the practice monitor will promptly communicate that to the Probation
Administrator.
- k) Respondent must make payments totaling \$1,000 to the Washington State Bar
Association to defray the costs and expenses of administering the probation, as
follows:

1. \$250 due within 30 days of the start of the probation;

- 1 2. \$250 due within 6 months of the start of the probation period;
- 2 3. \$250 due within 12 months of the start of the probation period; and
- 3 4. \$250 due within 18 months of the start of the probation period.
- 4 5. All payments should be provided to the Probation Administrator for processing.

5 VII. RESTITUTION

6 95. Respondent agrees to pay restitution to Adan Partida-Nunez in the amount of \$2,000
7 in accordance with ELC 13.7(b).

8 96. Respondent agrees to pay restitution to David Caballero-Reyes in the amount of
9 \$6,000 in accordance with ELC 13.7(b).

10 VIII. COSTS AND EXPENSES

11 97. Respondent shall pay costs of \$1,143.00, in accordance with ELC 13.9(i). The
12 Association will seek a money judgment under ELC 13.9(l) if these costs are not paid within 30
13 days of approval of this stipulation.

14 98. Respondent's failure to pay costs and expenses or to comply with the terms of a
15 periodic payment plan may be grounds for discipline.

16 IX. VOLUNTARY AGREEMENT

17 99. Respondent states that prior to entering into this Stipulation she has consulted
18 independent legal counsel regarding this Stipulation, that Respondent is entering into this
19 Stipulation voluntarily, and that no promises or threats have been made by ODC, the
20 Association, nor by any representative thereof, to induce the Respondent to enter into this
21 Stipulation except as provided herein.

22 100. Once fully executed, this stipulation is a contract governed by the legal principles
23 applicable to contracts, and may not be unilaterally revoked or modified by either party.

1 X. LIMITATIONS

2 101. This Stipulation is a compromise agreement intended to resolve this matter in
3 accordance with the purposes of lawyer discipline while avoiding further proceedings and the
4 expenditure of additional resources by the Respondent and ODC. Both the Respondent lawyer
5 and ODC acknowledge that the result after further proceedings in this matter might differ from
6 the result agreed to herein.

7 102. This Stipulation is not binding upon ODC or the respondent as a statement of all
8 existing facts relating to the professional conduct of the respondent lawyer, and any additional
9 existing facts may be proven in any subsequent disciplinary proceedings.

10 103. This Stipulation results from the consideration of various factors by both parties,
11 including the benefits to both by promptly resolving this matter without the time and expense of
12 hearings, Disciplinary Board appeals, and Supreme Court appeals or petitions for review. As
13 such, approval of this Stipulation will not constitute precedent in determining the appropriate
14 sanction to be imposed in other cases; but, if approved, this Stipulation will be admissible in
15 subsequent proceedings against Respondent to the same extent as any other approved
16 Stipulation.

17 104. Under ELC 9.1(d)(4), the Disciplinary Board reviews a stipulation based solely
18 on the record agreed to by the parties. Under ELC 3.1(b), all documents that form the record
19 before the Board for its review become public information on approval of the Stipulation by the
20 Board, unless disclosure is restricted by order or rule of law.

21 105. If this Stipulation is approved by the Disciplinary Board and Supreme Court, it
22 will be followed by the disciplinary action agreed to in this Stipulation. All notices required in
23 the Rules for Enforcement of Lawyer Conduct will be made.

1 106. If this Stipulation is not approved by the Disciplinary Board and Supreme Court,
2 this Stipulation will have no force or effect, and neither it nor the fact of its execution will be
3 admissible as evidence in the pending disciplinary proceeding, in any subsequent disciplinary
4 proceeding, or in any civil or criminal action.

5 WHEREFORE the undersigned being fully advised, adopt and agree to this Stipulation
6 to Discipline as set forth above.

7 Queta Romero
8 Queta Romero, Bar No. 98986
9 Respondent

Dated:

^{8 MS w/ email authorization from Queta Romero}
3/27/18

10 Alisa

11 Anne I. Seidel, Bar No. 22742
12 Counsel for Respondent

Dated:

3/28/18

13 Francesca D'Angelo

14 Francesca D'Angelo, Bar No. 22979
15 Senior Disciplinary Counsel

Dated:

3/28/18