

Aug 24, 2021

Disciplinary Board

Docket # 014

DISCIPLINARY BOARD WASHINGTON STATE BAR ASSOCIATION

|| In re

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MARA A. SNYDER,

Lawyer (Bar No. 43474).

Proceeding No. 21#00022

ODC File Nos. 21-00227, 21-00240, 21-00242, 21-00243, 21-00256, 21-00269, 21-00365, 21-00371

Resignation Form of Mara A. Snyder (ELC 9.3(b))

- I, Mara A. Snyder, declare as follows:
- 1. I am over the age of eighteen years and am competent. I make the statements in this declaration from personal knowledge.
 - 2. I was admitted to practice law in the State of Washington on February 14, 2011.
- 3. I have voluntarily decided to resign from the Washington State Bar Association (the Association) in Lieu of Discipline under Rule 9.3 of the Washington Supreme Court's Rules for Enforcement of Lawyer Conduct (ELC).
- 4. Attached hereto as Exhibit A is Disciplinary Counsel's statement of alleged misconduct for purposes of ELC 9.3(b). I am aware of the alleged misconduct stated in Disciplinary Counsel's statement, but rather than defend against the allegations, I wish to permanently resign from membership in the Association.

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Resignation Form of Mara A. Snyder (ELC 9.3(b))
Page 1

1	5. I consent to entry of an order under ELC 13.9(e) assessing expenses of \$1,500 in this
2	matter.
3	6. I agree to pay restitution to individuals who are owed refunds. Reconstructed client
4	ledgers are attached as Exhibits B and C. The individuals listed in Exhibit B filed grievances with
5	ODC as of July 9, 2021; the individuals listed in Exhibit C had not filed grievances with ODC as
6	of July 9, 2021 and are listed by initial. I agree to pay restitution to the individuals listed in
7	Exhibits B and C in the amounts reflected.
8	7. Restitution to Robert and Tiffany McKay of funds representing the proceeds from the
9	sale of their community property as listed in Exhibit B shall be made in accordance with the court
10	order regarding those proceeds entered August 16, 2019 in McKay v. McKay, Whatcom County
11	Superior Court No. 19-3-00350-37, or any subsequent court order regarding distribution of the
12	funds.
13	8. I agree to pay any additional costs or restitution that may be ordered by a Review
14	Committee under ELC 9.3(g).
15	9. I understand that my resignation is permanent and that any future application by me
16	for reinstatement as a member of the Association is currently barred. If the Washington Supreme
17	Court changes this rule or an application is otherwise permitted in the future, it will be treated as
18	an application by one who has been disbarred for ethical misconduct. If I file an application, I
19	will not be entitled to a reconsideration or reexamination of the facts, complaints, allegations, or
20	instances of alleged misconduct on which this resignation was based.
21	10. I agree to (a) notify all other states and jurisdictions in which I am admitted, of this
22	
23	The names of the individuals listed by initial in Exhibit C have been provided to me.
24	Resignation Form of Mara A. Snyder (ELC 9.3(b)) OFFICE OF DISCIPLINARY COUNSEL OF THE WASHINGTON STATE BAR ASSOCIATION

1	resignation in lieu of discipline; (b) seek to resign permanently from the practice of law in al					
2	other states and jurisdictions in which I am admitted, and (c) provide Disciplinary Counsel with					
3	copies of this notification and any response(s). I acknowledge that this resignation could be					
4	treated as a disbarment by all other jurisdictions.					
5	11. I agree to (a) notify all other professional licensing agencies in any jurisdiction from					
6	which I have a professional license that is predicated on my admission to practice law of this					
7	resignation in lieu of discipline; (b) seek to resign permanently from any such license; and (c)					
8	provide disciplinary counsel with copies of any of these notifications and any responses.					
9	12. I agree that when applying for any employment, I will disclose the resignation in lieu					
10	of discipline in response to any question regarding disciplinary action or the status of my license					
11	to practice law.					
12	13. I understand that my resignation becomes effective on Disciplinary Counsel's					
13	endorsement and filing of this document with the Clerk, and that under ELC 9.3(c) Disciplinary					
14	Counsel must do so promptly following receipt of this document.					
15	14. When my resignation becomes effective, I agree to be subject to all restrictions that					
16	apply to a disbarred lawyer.					
17	15. Upon filing of my resignation, I agree to comply with the same duties as a disbarred					
18	lawyer under ELC 14.1 through ELC 14.4.					
19	16. I understand that, after my resignation becomes effective, it is permanent. I will never					
20	be eligible to apply and will not be considered for admission or reinstatement to the practice of					
21	law nor will I be eligible for admission for any limited practice of law.					
22	17. I certify under penalty of perjury under the laws of the State of Washington that the					
23	foregoing is true and correct.					
24	Resignation Form of Mara A. Snyder OFFICE OF DISCIPLINARY COUNSEL					

Ang 24, 2021

Mara A. Snyder, Bar No. 43474

ENDORSED BY:

Joanne S. Abelson, Managing Disciplinary Counsel Bar No. 24877

Resignation Form of Mara A. Snyder (ELC 9.3(b)) Page 4

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

EXHIBIT A

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7 8		TARY BOARD TE BAR ASSOCIATION
9	In re	Proceeding No. 21#00022
11 12	MARA A. SNYDER, Lawyer (Bar No. 43474).	ODC File Nos. 21-00227, 21-00240, 21-00242, 21-00243, 21-00256, 21-00269, 21-00365, 21-00371
13 14		STATEMENT OF ALLEGED MISCONDUCT UNDER ELC 9.3(b)(1)
15	The attached formal complaint, filed	on July 7, 2021 in Proceeding No. 21#00022,
16	constitutes Disciplinary Counsel's statement of	of alleged misconduct under Rule 9.3(b)(1) of the
17	Washington Supreme Court's Rules for Enforce	ement of Lawyer Conduct (ELC).
18	DATED this 9th day of July, 2021.	•
19		m
20 21		Jounne S. Abelson, Bar No. 24877 Managing Disciplinary Counsel
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23		
24	Statement of Alleged Misconduct Page 1	OFFICE OF DISCIPLINARY COUNSEL OF THE WASHINGTON STATE BAR ASSOCIATION



Jul 7, 2021

Disciplinary Board

Docket # 009

DISCIPLINARY BOARD WASHINGTON STATE BAR ASSOCIATION

In re

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MARA A. SNYDER,

Lawyer (Bar No. 43474).

Proceeding No. 21#00022

FORMAL COMPLAINT

Under Rule 10.3 of the Washington Supreme Court's Rules for Enforcement of Lawyer Conduct (ELC), the Office of Disciplinary Counsel (ODC) of the Washington State Bar Association charges the above-named lawyer with acts of misconduct under the Washington Supreme Court's Rules of Professional Conduct (RPC) as set forth below.

ADMISSION TO PRACTICE

 Respondent Mara A. Snyder was admitted to the practice of law in the State of Washington on February 14, 2011.

FACTS

Background

Respondent's abandonment of practice

2. As of February 2021, Respondent was a family law lawyer in Bellingham with an

Formal Complaint Page 1

1	active practice. The office, Pacific Coast Family Law PLLC, was staffed by Respondent, a
2	paralegal, and a receptionist.
3	3. On or about February 17, 2021, Respondent abruptly closed Respondent's law
4	practice without notice to Respondent's clients. From that point on, the office was closed, the
5	office email was shut down, and clients had no way to contact Respondent or the other office
6	staff about their cases. The landlord brought in mail that was piling up outside the office.
7	4. On March 10, 2021, the Washington State Bar Association appointed a custodian
8	under ELC 7.7 to take control of Respondent's client files and trust account.
9	5. When the custodian arrived at Respondent's office, there were approximately 30
10	voice messages from distressed clients complaining of such issues as overbilling, missed
11	mediation appointments, and many missed zoom meetings. The custodian was left with
12	approximately 70 client files to distribute.
13	6. More than 30 of Respondent's former clients and others have filed grievances with
14	ODC regarding Respondent's abandonment of their cases and failure to refund unearned fees
15	that they paid in advance or other funds that Respondent should have been holding in trust.
16	Respondent trust account
17	7. Respondent maintained a trust account at Washington Federal, ending in 2703.
18	8. ODC's Audit Manager partially reconstructed Respondent's trust account from June
19	2019 through February 2021 based on financial records obtained from various sources,
20	including bank records and client ledgers Respondent maintained.
21	9. As of February 28, 2021, the funds in Respondent's trust account totaled \$1,137.77,
22	far below what Respondent should have been holding in trust for clients and third parties.
23	10. In aggregate, Respondent's trust account is deficient by more than \$380,000.

1	11. Respondent intended to deprive clients and third parties of their funds.
2	Elizabeth Crow
3	12. On January 11, 2021, Elizabeth Crow hired Respondent to represent Crow in a
4	family law case, including preparing a legal separation and a parenting plan. Crow signed a fee
5	agreement calling for a \$300 "availability retainer," which was not deposited into trust, and an
6	"advance-fee trust deposit" of \$5,000, which Crow paid.
7	13. The parenting plan was of vital interest to Crow because Crow did not have access to
8	the children.
9	14. Crow and Respondent spoke on January 27, 2021. Respondent promised to create
10	and share the parenting plan, but Respondent failed to do so.
11	15. Crow tried to contact Respondent by phone but never received a return call, and
12	eventually Respondent's mailbox was full.
13	16. Crow went to Respondent's office and learned from lawyers in an adjoining suite
14	that Respondent had closed Respondent's law practice.
15	17. Meanwhile, on February 21, 2021, Respondent missed a court date on a hearing
16	noted by opposing counsel. Respondent never sent Crow a link for the court hearing, so Crow
17	was absent as well.
18	18. Crow received an invoice from Respondent dated February 16, 2021, due on
19	February 17, 2021, the date that Respondent closed the office.
20	19. According to the invoice, Crow had a trust balance of \$4,824.70 as of the date of the
21	invoice, and Respondent was billing \$635 for file set up, phone calls, and emails between
22	January 11-27, 2021.
23	20. The invoice stated that Crow had a "Total Credit" of \$4,189.70.

1	21. Respondent has not refunded any funds to Crow.
2	Matthew Gustke
3	22. On January 27, 2021, Matthew Gustke hired Respondent in a dissolution matter.
4	Gustke signed a fee agreement calling for a \$300 "availability retainer," which was not
5	deposited into trust, and an "advance-fee trust deposit" of \$5,000, which Gustke paid by credit
6	card.
7	23. A few weeks into the representation, Respondent stopped responding to Gustke's
8	emails and phone calls.
9	24. Respondent never filed the dissolution papers as promised.
10	25. Gustke received an invoice from Respondent dated February 16, 2021, due on
11	February 17, 2021, the date that Respondent closed the office.
12	26. According to the invoice, Gustke had a trust balance of \$4,824.70 as of the date of
13	the invoice, and Respondent was billing \$420.00 for the file set up and emails received and sent
14	between February 2-12, 2021.
15	27. The invoice stated that Gustke has a "Total Credit" of \$4,404.70.
16	28. Respondent has not refunded any funds to Gustke.
17	Leslie Quinnell
18	29. On November 20, 2020, Leslie Quinnell hired Respondent to represent Quinnell in a
19	dissolution action. Quinnell signed a fee agreement calling for a \$300 "availability retainer,"
20	which was not deposited into trust, and an "advance-fee trust deposit" of \$6,000.
21	30. Notwithstanding the fee set in the fee agreement, Quinell paid Respondent a fee of
22	\$10,000 via cashier's check on November 23, 2020.
23	31. Quinnell and Respondent spoke once via FaceTime in November 2020.

1	respond to Krumpak's subsequent emails about the case.
2	42. By March 2, 2021, all of Krumpak's emails to Respondent and the office staff
3	bounced back and the voice mailbox was full.
4	43. Krumpak received an invoice from Respondent dated February 16, 2021, due on
5	February 17, 2021, the date that Respondent closed the office.
6	44. According to the invoice, Krumpak had a trust balance of \$6,272.35 as of the date of
7	the invoice and Respondent was billing \$2,465 for work performed between January 12-
8	February 12, 2021.
9	45. The invoice stated that Krumpak had a "Total Credit" of \$3,807.35.
10	46. Respondent has not refunded any funds to Krumpak.
11	Kami Dodd
12	47. On February 9, 2021, Dodd hired Respondent to obtain a domestic violence
13	protection order and parenting plan. Dodd signed a fee agreement calling for a \$300
14	"availability retainer," which was not deposited into trust, and an "advance-fee trust deposit" of
15	\$5,000, which Dodd paid in cash.
16	48. Respondent emailed Dodd financial disclosure paperwork, which Dodd filled out
17	and returned. After that, Dodd emailed Respondent repeatedly to check on the status of the
18	matter but Respondent did not respond.
19	49. By March 1, 2021, Dodd called and found that Respondent's voice mailbox was full
20	and all emails were returned as undeliverable.
21	50. In desperation, Dodd began calling other attorneys trying to find representation to
22	obtain an emergency no contact order. Another lawyer told Dodd that Respondent's practice
23	was closed and assisted Dodd in filing the necessary paperwork pro se.

1	51. Dodd received an invoice from Respondent dated February 16, 2021, due on
2	February 17, 2021, the date that Respondent closed the office.
3	52. According to the invoice, Dodd had a trust balance of \$5,000 as of the date of the
4	invoice, and Respondent was billing \$150 for the file set up on February 11, 2021.
5	53. The invoice stated that Dodd had an "IOLTA Account Balance" of \$4,850.
6	54. Respondent has not refunded any funds to Dodd.
7	<u>Client JC</u>
8	55. On January 20, 2021, JC signed a fee agreement with Respondent for representation
9	with respect to a relocation trial and preparation for that trial. The fee agreement called for a
10	\$300 "availability retainer," which was not deposited into trust, and an "advance-fee trust
11	deposit" of \$10,000, which JC paid by check and was deposited in trust.
12	56. Respondent prepared an invoice for JC dated February 16, 2021, due on February
13	17, 2021, the date that Respondent closed the office.
14	57. According to the invoice, Respondent billed JC \$665 for file set up, emails, and
15	preparation and filing of an order setting trial and discovery.
16	58. The invoice stated that JC had an "IOLTA account balance" of \$9,335.
17	59. Respondent has not refunded any fees to JC.
18	Robert McKay
19	60. In May 2019, Robert McKay paid Respondent \$5,000 for representation in a
20	dissolution from Tiffany McKay.
21	61. The McKays' dissolution trial initially was set for April 2020, but due to the
22	pandemic it was continued to December 8-10, 2020.
23	62. In late September 2020, Respondent's office asked Robert McKay to pay an

1	additional \$19,500 into trust for trial preparation, which McKay paid via two credit card
2	payments.
3	63. The December 2020 the trial date was continued again because Tiffany McKay hired
4	new counsel. The new trial date was March 30-April 1, 2021.
5	64. On February 15, 2021, Respondent abruptly cancelled a deposition of Tiffany
6	McKay, which Respondent had noted for the next day.
7	65. On February 26, 2021, Respondent failed to appear at a mediation. The mediator
8	advised Robert McKay that Respondent had missed three mediations that week.
9	66. The mediator also told Robert McKay that there was a settlement conference
10	scheduled for March 1, 2021. Respondent had not informed Robert McKay of the settlement
11	conference. Robert McKay appeared at the settlement conference without representation.
12	67. Robert McKay received an invoice from Respondent dated February 16, 2021, due
13	on February 17, 2021, the date that Respondent closed the office.
14	68. According to the invoice, Robert McKay had a trust balance of \$19,640.20 as of the
15	date of the invoice, and Respondent was billing \$4,494.93 for work performed between January
16	4-February 15, 2021.
17	69. The invoice also reflects charges of \$3,382.50 to prepare for the March 2021 trial,
18	which Respondent did not attend and was continued after Respondent abandoned Respondent's
19	practice.
20	70. The invoice stated that Robert McKay had an "IOLTA Account Balance" of
21	\$15,145.25.
22	71. Respondent has not refunded any funds to Robert McKay.
23	

1	Funds Belonging to Robert and Tiffany McKay
2	72. In August 2019, a mediation occurred in the McKay dissolution. The parties entered
3	into a CR2A agreement, which was operative throughout the time that Respondent represented
4	Robert McKay.
5	73. In July 2019, the McKays sold community property consisting of their home and a
6	piece of land in Blaine, Washington.
7	74. Per agreement, the parties transferred the proceeds, totaling \$322,060.52, to
8	Respondent for placement into Respondent's trust account to be distributed later.
9	75. Respondent deposited the funds into trust on July 31, 2019.
10	76. The court entered an agreed order memorializing this arrangement on August 16,
11	2019.
12	77. On August 28, 2019, Respondent wrote separate checks to Tiffany and Robert
13	McKay for \$30,000 each as partial distributions.
14	78. At that point, Respondent was holding \$262,060.52 in trust for the McKays with
15	respect to the sale of their community property (\$131,030.26 for each).
16	79. Respondent made no more distributions from the trust account for the benefit of the
17	McKays.
18	80. As of February 28, 2021, Respondent's trust account contained only \$1,137.77.
19	COUNT 1
20	81. By closing Respondent's law practice without notice to Respondent's clients, by
21	failing to provide a way for clients to obtain information about their legal matters, by failing to
22	deliver client files or property to them, and/or by failing to appear at mediations, meetings,
23	and/or court proceedings, Respondent abandoned the practice of law without providing for

1	Respondent's clients' needs in violation of RPC 1.3, RPC 1.4(a), and/or RPC 1.16(d).
2	COUNT 2
3	82. By taking funds belonging to clients and third parties from trust without entitlement,
4	Respondent violated RPC 8.4(b) (by committing the crime of theft, RCW 9A.56.020(1)(a),
5	9A.56.010(23)(b)), RPC 8.4(c), RPC 1.15A(b), RPC 1.15A(c)(2), and/or RPC 1.15A(h)(3).
6	COUNT 3
7	83. By failing to refund fees that clients paid in advance that had not been earned, and/or
8	by retaining fees for work that was of no benefit to the clients, Respondent violated RPC 1.5(a)
9	and/or RPC 1.16(d).
10	THEREFORE, Disciplinary Counsel requests that a hearing be held under the Rules for
11	Enforcement of Lawyer Conduct. Possible dispositions include disciplinary action, probation,
12	restitution, and assessment of the costs and expenses of these proceedings.
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14	Dated this 7th day of July, 2021.
15	has
16	Joanne S. Abelson, Bar No. 24877
17	Managing Disciplinary Counsel
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EXHIBIT B

Туре	Date	Num	Name	Memo	Debit	Credit	Balance
Client							
Baumgartner (Hawtl							
General Journal	09/17/2020	1		Transferred to Snyder, M.	2,315.85		(2,315.85)
General Journal	09/17/2020	111	Baumgartner (Hawthorn)	[Dep from a/r ledgers]		2,315.85	0.00
General Journal	09/17/2020	112	Baumgartner (Hawthorn)	[Dep from a/r ledger]		2,315.85	2,315.85
General Journal	10/23/2020	2		Inv 2358	360.00		1,955.85
General Journal	01/05/2021	3		Inv 2406	535.50		1,420.35
General Journal	02/16/2021	4		Inv 2466	780.00		640.35
Total Baumgartner (H	lawthorn) (21-003	346)			3,991.35	4,631.70	640.35
Beck, Reisha Mae (2							
Deposit	05/31/2019	BB	Unknown	[Based on Clio ledger]		4,862.50	4,862.50
General Journal	10/14/2019	5		Inv 2006	1,345.00		3,517.50
General Journal	10/29/2019	6		Inv 2056	720.50		2,797.00
General Journal	11/07/2019	7		Inv 2112	205.00		2,592.00
General Journal	12/04/2019	8		Inv 2142	133.00		2,459.00
General Journal	01/06/2020	9		Inv 2176	13.50		2,445.50
General Journal	06/05/2020	10		Inv 135.	135.00		2,310.50
General Journal	06/09/2020	11		Inv 2251	452.00		1,858.50
Total Beck, Reisha M	lae (21-00619)				3,004.00	4,862.50	1,858.50
Brown, Alan (21-003							
General Journal	07/21/2020	12		Inv 2234	727.50		(727.50)
Deposit	08/18/2020	Dep	Split	custody legal		4,500.00	3,772.50
Check	09/03/2020	1188	Whatcom Co. Superior C	Brown filing fee	260.00		3,512.50
General Journal	10/23/2020	13		Inv 2359	1,163.50		2,349.00
General Journal	10/23/2020	117	Brown, Alan	Offset check 1188 against receivable		260.00	2,609.00
General Journal	01/05/2021	14		Inv 2408	442.50		2,166.50
General Journal	02/16/2021	15		Inv 2468	982.50		1,184.00
Total Brown, Alan (21	1-00345)				3,576.00	4,760.00	1,184.00
Buma (Dodd), Jorda	ın (21-00816)						
Deposit	05/31/2019	BB	Unknown	[Based on Clio ledger]		3,460.35	3,460.35
Deposit	07/31/2019	Dep	Unknown	[Based on a/r report]		1,929.85	5,390.20
General Journal	07/31/2019	169		Inv 1975	402.00		4,988.20
General Journal	08/30/2019	170		Inv 2017	344.50		4,643.70
General Journal	10/29/2019	171		Inv 2064	1,886.00		2,757.70
General Journal	12/04/2019	172		Inv 2150	174.00		2,583.70
General Journal	01/06/2020	173		Inv 2180	222.50		2,361.20
General Journal	06/07/2020	174		Inv 2209	263.00		2,098.20
Total Buma (Dodd), J	lordan (21-00816))			3,292.00	5,390.20	2,098.20

Туре	Date	Num	Name	Memo	Debit	Credit	Balance
Buma, Aaron D. (21	-00302)						
Deposit General Journal	01/19/2021 02/16/2021	Dep 16	Split	Jan 2021 CS Adjustment Inv 2469	461.00	3,000.00	3,000.00 2,539.00
Total Buma, Aaron D	. (21-00302)				461.00	3,000.00	2,539.00
Chandonnet, Timotl Deposit General Journal General Journal General Journal General Journal Deposit	ny (21-00399) 03/04/2020 06/07/2020 10/23/2020 10/23/2020 10/29/2020 11/05/2020	Dep 17 18 20 19 Dep	Split Timothy E Chandonnet	[Based on date] Inv 2258 Inv 2318 Inv 2361 Inv 2361 [Duplicate or extended amount] Balance Due \$500 to trust	474.50 2,650.00 375.50 37.50	3,500.00 537.50	3,500.00 3,025.50 375.50 0.00 (37.50) 500.00
Total Chandonnet, Ti	mothy (21-00399)			3,537.50	4,037.50	500.00
Chevis, Trini (21-00) General Journal General Journal General Journal	09/03/2020 10/23/2020 02/16/2021	21 22 23	Chevis, Trini	Respondent ledger says Cash deposit - no co Inv 2363 Inv 2470	150.00 412.50	3,500.00	3,500.00 3,350.00 2,937.50
Total Chevis, Trini (2	1-00452)				562.50	3,500.00	2,937.50
Crocker, Hanna (21- Deposit Check General Journal General Journal General Journal General Journal Deposit General Journal General Journal	00244) 08/18/2020 08/26/2020 10/23/2020 10/23/2020 10/23/2020 01/05/2021 01/13/2021 02/16/2021 02/16/2021	Dep 1164 25 26 118 27 Dep 28 29	Split Whatcom Co. Superior C Crocker, Hanna (C) Square	Deposit Crocker Filing Fee Inv 2322 Inv 2366 Apply ck #1164 to receivable Inv 2412 External Deposit Square Inc L64112 - 21011 Inv 2412 Inv 2473	314.00 1,153.00 2,500.00 1,347.00 3,193.50 206.50	5,000.00 314.00 4,824.85	5,000.00 4,686.00 3,533.00 1,033.00 1,347.00 0.00 4,824.85 1,631.35 1,424.85
Total Crocker, Hanna	(21-00244)				8,714.00	10,138.85	1,424.85
Crow, Elizabeth (21- Deposit General Journal	00240) 01/12/2021 02/16/2021	Dep 30	Square	[Based on amount and date] Inv 2474	635.00	4,824.70	4,824.70 4,189.70
Total Crow, Elizabeth	(21-00240)				635.00	4,824.70	4,189.70
Dezeeuw, Elizabeth Deposit Check	10/08/2020 01/22/2021	Dep 1217	Split Elizabeth Dezeeuw	Retainer Trust Refund	1,073.00	2,000.00	2,000.00 927.00
Total Dezeeuw, Eliza	beth				1,073.00	2,000.00	927.00

Туре	Date	Num	Name	Memo	Debit	Credit	Balance
Dial, Lori (21-00436) Deposit General Journal General Journal General Journal	09/24/2020 10/23/2020 10/23/2020 02/16/2021	Dep 31 32 33	Split	Lori Dian - divorce [check from Mary Beth Sn Inv 2413 Inv 2368 Inv 2475	1,816.50 150.00 1,808.00	5,000.00	5,000.00 3,183.50 3,033.50 1,225.50
Total Dial, Lori (21-004	136)				3,774.50	5,000.00	1,225.50
Dodd, Kami (21-00269 Deposit General Journal Total Dodd, Kami (21-0	02/10/2021 02/16/2021	Dep 34	Split	Cash In Inv 2476	150.00 150.00	5,000.00	5,000.00 4,850.00 4,850.00
Glenn, Andrew (21-00	,				130.00	3,000.00	4,000.00
General Journal General Journal General Journal General Journal	05/06/2019 07/31/2019 08/09/2019 08/29/2019	35 36 37 38	Glenn, Andrew	[Deposit prior to beginning of ODC reconstruc Inv 1983 Inv 2022 Inv 2022 [Additional or duplicate]	264.50 357.00 0.50	5,000.00	5,000.00 4,735.50 4,378.50 4,378.00
Check General Journal General Journal General Journal General Journal	09/05/2019 10/29/2019 11/07/2019 11/07/2019 11/22/2019	4200 39 40 119 44	Whatcom Co. Superior C Glenn, Andrew Glenn, Andrew	Glenn - CD Inv 2069 Inv 2124 Offset ck #4200 against invoice [Dep from a/r ledgers. No deposit seen on ba	25.00 3,348.50 27.00	25.00 1,625.00	4,353.00 1,004.50 977.50 1,002.50 2,627.50
General Journal Deposit General Journal General Journal	12/04/2019 03/06/2020 06/05/2020 06/07/2020	41 Dep 42 43	Square	Inv 2154 [From Bookkeeper's QB] Inv 2211 Inv 2263	1,127.50 563.00 162.00	964.85	1,500.00 2,464.85 1,901.85 1,739.85
Total Glenn, Andrew (2	21-00479)				5,875.00	7,614.85	1,739.85
Gustke, Matthew (21- Deposit Deposit General Journal	00242) 02/08/2021 02/10/2021 02/16/2021	Dep Dep 45	Square Square	External Deposit Square Inc L64568 - 21020 External Deposit Square Inc L64610 - 21021 Inv 2482	420.00	2,894.85 1,929.85	2,894.85 4,824.70 4,404.70
Total Gustke, Matthew	(21-00242)				420.00	4,824.70	4,404.70
Hall, Tylor (21-00355) Deposit Check General Journal General Journal General Journal General Journal	07/02/2020 10/21/2020 10/23/2020 10/23/2020 10/23/2020 01/05/2021	Dep 1196 46 47 120 48	Square Whatcom Co. Superior C Hall, Tylor	[Based on a/r ledger] Hall PP Filing Fee Inv 2325 Inv 2371 Offset ck 1196 against invoice Inv 2418	260.00 995.00 407.50 1,132.50	4,824.85 260.00	4,824.85 4,564.85 3,569.85 3,162.35 3,422.35 2,289.85
Total Hall, Tylor (21-00	355)				2,795.00	5,084.85	2,289.85

Туре	Date	Num	Name	Memo	Debit	Credit	Balance
Hamilton, Marian (2	1-00706)						
Deposit	03/13/2020	Dep	Unknown	[From a/r ledger]		4,869.90	4,869.90
General Journal	06/07/2020	128		Inv 2265	1,376.50		3,493.40
Check	06/24/2020	1173	Whatcom Superior Court	Filing Fee - MH	260.00		3,233.40
General Journal	10/23/2020	129		Inv 2265	1,989.50		1,243.90
General Journal	10/23/2020	132	MH	Offset Receivable against cost payment		260.00	1,503.90
General Journal	01/05/2021	130		Inv 2326	1,503.90		0.00
Deposit	01/08/2021	Dep	Unknown	Deposit	0.04=.40	3,315.10	3,315.10
General Journal	02/01/2021	131	0174	Inv 2419	3,315.10	4 000 00	0.00
Deposit	02/10/2021	Dep	Split	Deposit		1,800.00	1,800.00
Total Hamilton, Maria	an (21-00706)				8,445.00	10,245.00	1,800.00
Howard, R. Jeremy							
General Journal	01/09/2020	127	Howard, R. Jeremy	[Based on copy of Grievant's check]		6,000.00	6,000.00
Check	03/04/2020	1158	Whatcom Superior Court	Howard Filing Fee	314.00		5,686.00
General Journal	06/07/2020	49		Inv 2268	2,355.00		3,331.00
General Journal	06/07/2020	121	Howard, R. Jeremy	Offset ck 1158 against invoice	007.00	314.00	3,645.00
General Journal	10/23/2020	50		Inv 2328	667.00		2,978.00
General Journal	10/23/2020	51	O. It	Inv 2373	1,481.00	F 000 00	1,497.00
Deposit	11/19/2020	Dep	Split	R. Jeremy Howard [check from Ricky or Rach Inv 2421	004.00	5,000.00	6,497.00
General Journal	01/05/2021	52		INV 2421	884.00		5,613.00
Total Howard, R. Jer	emy (21-00478)				5,701.00	11,314.00	5,613.00
Jablonski, Kevin (2		4.40	14.1			5 700 05	5 700 05
General Journal	11/10/2020	149	KJ	[Deposit - Credit Card - can't identify in trust a	4 0 4 0 0 0	5,789.85	5,789.85
General Journal	01/05/2021	133		Inv 2422	1,646.00		4,143.85
General Journal	02/16/2021	134		Inv 2484	600.00		3,543.85
Total Jablonski, Kevi	n (21-00593)				2,246.00	5,789.85	3,543.85
Jimenez-James, Ja			0124	Market		4 000 00	4 000 00
Deposit General Journal	09/03/2020 10/23/2020	Dep	Split	Mari - post secondary support Inv 2375	751.50	1,000.00	1,000.00 248.50
General Journal	01/05/2021	175 176		Inv 2423	67.50		248.50 181.00
				IIIV 2423 -			
Total Jimenez-James		-00837)			819.00	1,000.00	181.00
Krumpack, Tania (2		_					
Deposit	01/12/2021	Dep	Square	[Based on amount and date]	0.405.00	6,272.35	6,272.35
General Journal	02/16/2021	53		Inv 2486	2,465.00		3,807.35
Total Krumpack, Tan	ia (21-00256)				2,465.00	6,272.35	3,807.35
Loveall Price, Kim (21-00257)						
Deposit	01/07/2021	Dep	Square	[Based on date and amount]		4,824.85	4,824.85
General Journal	02/16/2021	54		Inv 2488	150.00		4,674.85
Total Loveall Price, k	(im (21-00257)			_	150.00	4,824.85	4,674.85
, -	, /					,-	,

Type	Date	Num	Name	Memo	Debit	Credit	Balance
Martin (aka Hickok)	, Chauntae (21-0	0485)					
General Journal	01/06/2019	57		Inv 2188	29.50		(29.50)
Deposit	10/29/2019	Dep	Unknown	[Based on date]		4,862.50	4,833.00
General Journal	11/07/2019	55 [°]		Inv 2131	873.50		3,959.50
General Journal	12/04/2019	56		Inv 2162	465.50		3,494.00
General Journal	06/05/2020	58		Inv 2222	603.00		2,891.00
General Journal	06/07/2020	59		Inv 2279	743.00		2,148.00
General Journal	10/23/2020	60		Inv 2337	1,153.00		995.00
General Journal	10/23/2020	61		Inv 2381	814.00		181.00
Deposit	11/03/2020	Dep	Square	External Deposit Square Inc L62833 - 20110		785.36	966.36
General Journal	01/05/2021	62	'	Inv 2431	587.50		378.86
Total Martin (aka Hic	kok), Chauntae (2	21-00485)			5,269.00	5,647.86	378.86
McKay, Robert (21-0							
Check	06/04/2019	4186	Whatcom Co. Superior C	McKay Filing Fee	314.00		(314.00)
General Journal	06/21/2019	73	McKay, Robert Keith	Deposit from a/r ledger		300.00	(14.00)
General Journal	06/21/2019	74	McKay, Robert Keith	Deposit from a/r ledger		4,862.50	4,848.50
General Journal	10/14/2019	64		Inv 2031	1,355.00		3,493.50
General Journal	10/14/2019	122	McKay, Robert Keith	Offiset ck 4186 against invoice		314.00	3,807.50
General Journal	10/29/2019	65	-	Inv 2082	1,852.50		1,955.00
General Journal	11/07/2019	66		Inv 2132	257.50		1,697.50
General Journal	12/04/2019	67		Inv 2163	32.00		1,665.50
General Journal	02/05/2020	63	McKay, Robert Keith	[Deposit not in financial records - from a/r led		2,000.00	3,665.50
General Journal	06/05/2020	68	•	Inv 2223	437.00		3,228.50
General Journal	06/07/2020	69		Inv 2280	95.50		3,133.00
Deposit	09/25/2020	Dep	Square	[From client ledgers]		9,408.60	12,541.60
Deposit	09/28/2020	Dep .	Square	[From client ledgers]		9,408.60	21,950.20
General Journal	10/23/2020	70	•	Inv 2338	489.00		21,461.20
General Journal	01/05/2021	71		Inv 2432	1,821.00		19,640.20
General Journal	02/16/2021	72		Inv 2489	4,494.93		15,145.27
Total McKay, Robert	(21-00371)				11,148.43	26,293.70	15,145.27
McKay, Robert and	Tiffany House (2	21-00365 an					
Deposit	07/31/2019	Dep	Unknown	Deposit		322,060.52	322,060.52
Check	08/28/2019	4198	Robert McKay	Per CR2A - distib of proceeds	30,000.00		292,060.52
Check	08/28/2019	4199	Tiffany McKay	Per CR2A - distrib of proceeds	30,000.00		262,060.52
Total McKay, Robert	and Tiffany Hous	se (21-00365		60,000.00	322,060.52	262,060.52	

Туре	Date	Num	Name	Memo	Debit	Credit	Balance
McMurray, Kristen	(21-00357)						
Check	08/10/2020	1206	Whatcom Co. Superior C	Filing Fee - McMurray	314.00		(314.00)
Deposit	08/18/2020	Dep	Split	Deposit		5,000.00	4,686.00
General Journal	10/23/2020	113		Inv 2339	1,247.50		3,438.50
General Journal	10/23/2020	116		Inv 2382	633.00	044.00	2,805.50
General Journal	10/23/2020	123	McMurray, Kristen	Offset ck 1206 against inivoice	0.40.00	314.00	3,119.50
General Journal General Journal	01/05/2021 02/16/2021	114 115		Inv 2433 Inv 2490	240.00 120.00		2,879.50
General Journal	02/16/2021	115		INV 2490	120.00		2,759.50
Total McMurray, Kris	sten (21-00357)				2,554.50	5,314.00	2,759.50
Michaelson, Jason	(21-00590)						
Deposit	07/31/2019	Dep	Unknown	[Based on a/r report]		4,824.85	4,824.85
Check	08/01/2019	4195	Whatcom Co. Superior C	Michaelson Filing Fee	314.00		4,510.85
General Journal	08/01/2019	151	Michaelson	[Offset payment for cost]		314.00	4,824.85
General Journal	10/14/2019	150		Inv 2032	764.00		4,060.85
General Journal	10/29/2019	152		Inv 2083	598.00		3,462.85
General Journal Deposit	12/04/2019 03/30/2020	153 Dep	Square	Inv 2164 [From a/r ledger]	440.00	2,412.35	3,022.85 5,435.20
General Journal	05/18/2020	154	Square	Inv 2242	2,447.00	2,412.33	2,988.20
General Journal	06/07/2020	155		Inv 2281	1,594.50		1,393.70
General Journal	10/23/2020	156		Inv 2340	302.50		1,091.20
General Journal	02/16/2021	157		Inv 2491	90.50		1,000.70
Total Michaelson, Ja	son (21-00590)				6,550.50	7,551.20	1,000.70
Miller, Alzbeta (21-0	10339)						
Deposit	07/17/2020	Dep	Split	Deposit		6,500.00	6,500.00
Deposit	01/19/2021	Dep	Split	Boposit		3,000.00	9,500.00
•	(04,00000)		·			0.500.00	0.500.00
Total Miller, Alzbeta	(21-00339)				0.00	9,500.00	9,500.00
Moore, Barry (21-00							
Deposit	06/05/2020	Dep	Square	[From a/r ledger]		4,824.85	4,824.85
General Journal	06/07/2020	75		Inv 2282	179.50		4,645.35
Check	10/21/2020	1197	Whatcom Co. Superior C	B. Moore PT Mod. Filing Fee	56.00		4,589.35
General Journal	10/23/2020	76 77		Inv 2342	2,496.00		2,093.35
General Journal General Journal	10/23/2020 10/23/2020	77 124	Moore, Barry	Inv 2384	2,149.35	56.00	(56.00) 0.00
Deposit	10/23/2020	Dep	Square	Offset ck 1197 against invoice [Based on amount and a/r ledger]		2,894.85	2,894.85
General Journal	01/05/2021	79	Square	Inv 2435	2.894.85	2,094.00	0.00
Deposit	01/03/2021	Dep	Square	[Based on date and amount]	2,004.00	4,824.85	4,824.85
General Journal	01/07/2021	78	- 7	Inv 2384	617.65	.,0200	4,207.20
General Journal	01/07/2021	80		Inv 2435	2,187.15		2,020.05
General Journal	02/16/2021	81		Inv 2493	1,520.50		499.55
Total Moore, Barry (2	21-00504)				12,101.00	12,600.55	499.55

Туре	Date	Num	Name	Memo	Debit	Credit	Balance
Murray, Kieran (21-	00239)						
General Journal General Journal	05/21/2019 08/09/2019	82 83	Murray, Kieran	[Deposit from a/r - prior to beginning of recon Inv 2051	717.00	5,000.00	5,000.00 4,283.00
General Journal General Journal General Journal	10/29/2019 12/04/2019 01/06/2020	84 85 86		Inv 2084 Inv 2173 Inv 2189	632.50 55.00 2,138.00		3,650.50 3,595.50 1,457.50
General Journal General Journal	06/05/2020 06/05/2020 06/07/2020	87 90		Inv 2224 Inv 2284	974.50 27.50		483.00 455.50
Deposit Check	07/17/2020 10/05/2020	Dep 1192	Split Whatcom Co. Superior C	Deposit Murray Kieran	25.00	2,000.00	2,455.50 2,430.50
General Journal General Journal General Journal	10/23/2020 10/23/2020 01/05/2021	88 125 89	Murray, Kieran	Inv 2386 Offset ck 1192 against invoice Inv 2438	507.49 395.00	25.00	1,923.01 1,948.01 1,553.01
Total Murray, Kieran		09		IIIV 2430	5,471.99	7,025.00	1,553.01
Murray, Stephani K	av (21-00210)						
Deposit General Journal	07/02/2019 08/09/2019 06/05/2020 06/07/2020 10/23/2020 01/05/2021 02/16/2021	Dep 91 92 93 94 95 96	Unknown	Deposit Inv 2050 Inv 2225 Inv 2283 Inv 2343 Inv 2437 Inv 2495	382.50 864.50 1,529.50 67.50 950.50 54.50	5,000.00	5,000.00 4,617.50 3,753.00 2,223.50 2,156.00 1,205.50 1,151.00
Total Murray, Stepha	ni Kay (21-00210)			3,849.00	5,000.00	1,151.00
Noah Cerise (21-00) Deposit General Journal General Journal	09/03/2020 10/23/2020 01/05/2021	Dep 97 98	Split	Retainer Inv 2387 Inv 2439	232.50 480.00	4,500.00	4,500.00 4,267.50 3,787.50
Total Noah Cerise (2	1-00465)				712.50	4,500.00	3,787.50
Payne, Ryan N (21- Deposit	00305) 09/16/2020	Dep	Split	Deposit		2,500.00	2,500.00
Total Payne, Ryan N	(21-00305)				0.00	2,500.00	2,500.00
Quinnell, Leslie (21 Deposit General Journal General Journal	-00243) 11/23/2020 01/05/2021 02/16/2021	Dep 100 99	Leslie Quinnell	[Cashier's check] Inv 2443 Inv 2497	150.00 264.00	10,000.00	10,000.00 9,850.00 9,586.00
Total Quinnell, Leslie	e (21-00243)				414.00	10,000.00	9,586.00

Type	Date	Num	Name	Memo	Debit	Credit	Balance
Radwanski, Crysta	I (21-00565)						
Deposit	02/13/2020	Dep	Square	[Deposit shown on a/r as \$2,500. Difference		2,434.90	2,434.90
General Journal	06/07/2020	158	·	Inv 2287	836.50		1,598.40
General Journal	10/23/2020	159		Inv 2391	324.50		1,273.90
General Journal	01/05/2021	160		Inv 2444	294.50		979.40
Total Radwanski, Cr	ystal (21-00565)				1,455.50	2,434.90	979.40
Willoughby (21-002	241)						
Deposit	11/22/2019	Dep	Square	[From a/r ledger]		1,447.35	1,447.35
General Journal	12/04/2019	101	·	Inv 2172	150.00		1,297.35
General Journal	01/09/2020	102		Inv 2196	77.50		1,219.85
Deposit	01/23/2020	Dep	Split	[From Bookkeeper QB] [from a/r register]		4,700.00	5,919.85
Check	02/19/2020	1154	Whatcom Superior Court	Willoughby mod fee	56.00		5,863.85
General Journal	06/05/2020	103		Inv 2236	2,067.75		3,796.10
General Journal	06/05/2020	126	Willoughby, Forrest	Offset ck 1154 against invoice		56.00	3,852.10
General Journal	06/07/2020	104		Inv 2296	2,486.50		1,365.60
General Journal	10/23/2020	105		Inv 2352	501.50		864.10
General Journal	10/23/2020	106		Inv 2399	118.00		746.10
Deposit	10/28/2020	Dep	Square	[Based on amount, date and a/r ledger]		1,736.85	2,482.95
General Journal	01/05/2021	107		Inv 2453	1,536.50		946.45
Total Willoughby (21	-00241)				6,993.75	7,940.20	946.45
Wunn, Jennifer M (21-00356)						
Deposit	09/24/2020	Dep	Split	Deposit		5,000.00	5,000.00
General Journal	10/23/2020	108		Inv 2400	300.00		4,700.00
General Journal	01/05/2021	109		Inv 2454	643.50		4,056.50
General Journal	02/16/2021	110		Inv 2502	150.00		3,906.50
Total Wunn, Jennife	r M (21-00356)			_	1,093.50	5,000.00	3,906.50
tal Client				_	179,300.52	547,483.83	368,183.31
L					179,300.52	547,483.83	368,183.31
				=			

EXHIBIT C

M. Snyder Client Ledgers/Receivables Reconstructed by ODC Clients who appear to have active ledgers and balances

Туре	Date	Num	Name	Memo	Debit	Credit	Balance
lient							
JC	00/05/0004	D	0-14	Deteinen		40,000,00	40,000,00
Deposit General Journal	02/05/2021 02/16/2021	Dep 24	Split	Retainer Inv 2471	665.00	10,000.00	10,000.00 9,335.00
	02/10/2021	24		1117 2-77 1		40.000.00	
Total JC					665.00	10,000.00	9,335.00
LM	10/01/0000					5 000 00	5 000 00
Deposit	10/01/2020	Dep	CC	LM (fee for lawyer retainer) [ck from C C] Inv 2385	300.00	5,000.00	5,000.00
General Journal General Journal	10/23/2020 01/05/2021	135 136		Inv 2385 Inv 2436	1,056.00		4,700.00 3,644.00
	01/03/2021	130		IIIV 2430			,
Total LM					1,356.00	5,000.00	3,644.00
RC	04/07/0000	D	C-134	(Farm Barkkers of OD)		400.00	400.00
Deposit Check	01/07/2020 01/07/2020	Dep 4222	Split Whatcom Co. Superior Court	[From Bookkeeper QB] RC - CD	25.00	400.00	400.00 375.00
General Journal	01/07/2020	142	CR	Offset A/r against cost payment	25.00	25.00	400.00
Deposit	01/07/2020		Split	[From Bookkeeper QB]		1,558.20	1,958.20
Deposit		Dep		[From a/r ledger]		1,266.10	3,224.30
	01/30/2020 02/28/2020	Dep	Square Split	[From bookkeeper's QB]		973.90	3,224.30 4,198.20
Deposit		Dep					
Deposit	02/28/2020	Dep	Split	[From bookkeeper's QB]		973.90	5,172.10
Deposit	05/28/2020	Dep	Square	[from a/r records]	1.075.05	964.85	6,136.95
General Journal	06/05/2020	137		Inv 2228	1,675.35		4,461.60
General Journal	06/07/2020	138		Inv 2288	953.50	0.40.00	3,508.10
Deposit	06/11/2020	Dep	Square	[From a/r records]		919.98	4,428.08
Check	08/03/2020	1180	Whatcom Co. Superior Court	RC, filing mod	56.00	50.00	4,372.08
General Journal	08/03/2020	143	CR	Offset a/r against cost payment		56.00	4,428.08
Deposit	08/21/2020	Dep	Square	[Based on Date]		460.15	4,888.23
General Journal	10/23/2020	139		Inv 2345	477.00		4,411.23
General Journal	10/23/2020	140		Inv 2392	665.50		3,745.73
General Journal	01/05/2021	141		Inv 2445	1,559.50		2,186.23
Total RC					5,411.85	7,598.08	2,186.23
SS							
Deposit	07/17/2020	Dep	Split	Retainer		5,000.00	5,000.00
General Journal	10/23/2020	144		Inv 2393	4,035.00		965.00
General Journal	01/05/2021	145		Inv 2446	700.00		265.00
Deposit	01/19/2021	Dep	Split	Retainer 2021		1,255.00	1,520.00
General Journal	02/16/2021	146		Inv 2499	530.00		990.00
Total SS					5,265.00	6,255.00	990.00
JS							
Deposit	12/09/2020	Dep	Split	[Check from PM]		4,000.00	4,000.00
General Journal	01/05/2021	147	•	Inv 2448	3,970.00		30.00
General Journal	01/05/2021	148		Inv 2500	1,233.00		(1,203.00
Deposit	02/05/2021	Dep	Split	Sterling		500.00	(703.00
Deposit	02/05/2021	Dep	Split	[Check from KM]		1,000.00	297.00
Deposit	02/10/2021	Dep	Split	[check from PM]		2,000.00	2,297.00
Total JS					5,203.00	7,500.00	2,297.00
otal Client					17,900.85	36,353.08	18,452.23