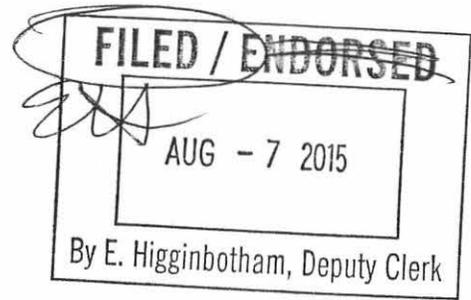


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14 Attorneys for Defendant Roni Lynn Deutch

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
16 FOR THE COUNTY OF SACRAMENTO

17 THE PEOPLE OF THE STATE OF CALIFORNIA,

18 Plaintiff,

19 vs.

20 RONI LYNN DEUTCH

21 Defendant.

Case No: 34-2010-0085933

**STIPULATION FOR SETTLEMENT OF  
SPECIAL CIVIL PROCEEDING AND  
ENTRY OF [~~PROPOSED~~] ORDER;  
[~~PROPOSED~~] ORDER**

22 This Stipulation for Settlement of Special Civil Proceeding and Entry of  
23 [Proposed] Order ("Stipulation") is entered into between Plaintiff, the People of the  
24 State of California (the "People") and Defendant, Roni Lynn Deutch ("Ms.  
25  
26  
27  
28

1 Deutch”). The Stipulation reflects the Parties’ mutual agreement and  
2 understanding concerning the resolution of a contempt action initiated by the  
3 People against Ms. Deutch arising from Sacramento Superior Court Case No. 34-  
4 2010-00085933, and brought as a Special Proceeding of a Civil Nature pursuant  
5 to Code of Civil Procedure section 1209 et seq. The Parties have also entered  
6 into a Stipulation for Entry of Judgment as to Defendant in the underlying civil  
7 action, to be filed concurrently with the Court.

### 8 **I. Procedural Background**

9 On or about August 24, 2010, the People initiated a civil suit against Ms.  
10 Deutch and her former law firm, Roni L. Deutch, A Professional Tax Corporation,  
11 alleging violations of California Business & Professions Code sections 17200 and  
12 17500.

13 During the course of the underlying litigation, the Court issued three orders  
14 that formed the basis of the contempt allegations: an Order to Show Cause  
15 issued on or about August 31, 2010 (“the OSC”); a Preliminary Injunction Order  
16 issued on or about November 17, 2010 (“the Preliminary Injunction”; and a  
17 Temporary Restraining Order and Temporary Appointment of Receiver issued on  
18 or about April 20, 2011 (the “Receiver Order”). The initial contempt allegations  
19 were filed by the People against Deutch on April 19, 2011, alleging violations of  
20 the OSC and Preliminary Injunction; additional contempt allegations were filed on  
21 July 7, 2011, alleging violations of the Receiver Order; and on July 13, 2011, the  
22 People filed consolidated and expanded contempt allegations, in the form of an  
23 affidavit setting forth 1,609 counts of contempt alleging violations of the OSC, the  
24 Preliminary Injunction, and the Receiver Order. On or about September 10, 2014,  
25 the People filed superseding amended contempt allegations, reducing the number  
26 of counts to 68, again based on alleged violations of the OSC, Preliminary  
27 Injunction, and Receiver Order. The Defendant appeared for arraignment on the  
28 superseding amended contempt allegations on October 17, 2014. No plea was

1 entered, as Ms. Deutch submitted a written demurrer to all 68 counts; further  
2 hearing on the demurrer has been continued pending the Parties' ongoing joint  
3 efforts to resolve the contempt and underlying civil matters.

## 4 **II. Jurisdiction**

5 For purposes of this Stipulation only, the Parties acknowledge that the  
6 Court has jurisdiction over the allegations of contempt violations contained in the  
7 superseding amended contempt allegations filed on September 10, 2014; that the  
8 Court has personal jurisdiction of Ms. Deutch as to the acts alleged therein; that  
9 the venue is proper in the Court; and that the Court has jurisdiction to approve  
10 this Stipulation and enter the [Proposed] Order and to enforce the provisions  
11 thereof.

## 12 **III. Resolution of Disputed Claims**

13 The Parties enter into this Stipulation as a compromise and resolution of  
14 disputed claims for the purpose of furthering the public interest and avoiding  
15 protracted litigation. By execution of this Stipulation, Ms. Deutch does not admit  
16 any fact, finding, issue of law, or violation of law, nor shall compliance with this  
17 Stipulation constitute or be construed as an admission by Ms. Deutch of any fact,  
18 finding, conclusion, issue of law or violation of law.

## 19 **IV. Joint Request for Stay**

20 Within ten (10) calendar days of the execution of this Stipulation, the  
21 Parties shall file this signed Stipulation with the Court and jointly request the Court  
22 for a stay in the contempt portion of the proceedings in Case No. 34-2010-  
23 00085933.

## 24 **V. Defendant's Performance**

25 Within three years of the entry of the [Proposed] Order, the Defendant shall  
26 complete 350 hours of volunteer service. The Defendant may complete the  
27 volunteer service with any organization of her choice, subject to the Court's  
28 approval. The Defendant shall file and serve annual reports to the Court from the

1 approved volunteer organization(s), confirming the number of volunteer hours  
2 completed. The initial annual report shall be filed within one year of entry of the  
3 [Proposed] Order, and annually each year thereafter until the requisite 350 hours  
4 of volunteer service are completed and proof of such completion is submitted to  
5 the Court.

6 Within three years of entry of the [Proposed] Order, the Defendant will remit  
7 to Sacramento County the sum of ten thousand dollars (\$10,000.00) as  
8 reimbursement to the County for attorneys' fees and costs incurred in this matter.  
9 Approximately \$6,455 remains in the following four accounts held by JPMorgan  
10 Chase & Co.:

- 11 • Attorney Roni Lynn Deutch, Account Number \*\*\*\*\*7482
- 12 • Benigirl LLC, Account Number \*\*\*\*\*5458
- 13 • TLF Ventures LLC, Account Number \*\*\*\*\*5466
- 14 • Niko & Inu LLC Account Number \*\*\*\*\*5474

15 These accounts were frozen by an order on April 20, 2011. The Parties agree  
16 that any funds available in the accounts, up to the amount of \$10,000, shall be  
17 applied toward the reimbursement amount owed to the County, and request that  
18 the funds in the accounts, up to the amount of \$10,000, be released from the April  
19 20, 2011 order for that purpose.

20 At the conclusion of the three-year period following entry of the [Proposed]  
21 Order, the Defendant shall be discharged from any obligation to reimburse  
22 Sacramento County any amount still due on the sum of ten thousand dollars  
23 (\$10,000.00) upon a sufficient showing to the Court *in camera* and under oath  
24 that she does not have the ability to pay any amount still due.

#### 25 **VI. Dismissal of Contempt Charges**

26 At the end of the three-year period following entry of the [Proposed] Order,  
27 or at such earlier time that the Court has found that Defendant has completed the  
28 350 hours of volunteer service set forth above at Paragraph V, the Court shall

1 dismiss with prejudice of all contempt allegations pending against the Defendant.  
2 As part of this dismissal, the Court shall expressly order that the People are not  
3 entitled to any attorneys' fees and costs pursuant to Code of Civil Procedure  
4 section 1218, subdivision(a), and that each side will bear their own fees and costs  
5 except as otherwise provided herein. Should Ms. Deutch fail to complete the 350  
6 hours of volunteer service within three years of the entry of the [Proposed] Order,  
7 this paragraph (Paragraph VI) will be null and void.

8 **VII. Scope of Stipulation**

9 This Stipulation is a final and binding resolution of all alleged claims of  
10 contempt, claims of violations or causes of action for contempt alleged by the  
11 People against the Defendant, and all alleged claims of contempt, alleged  
12 violations or causes of action for contempt that could have been asserted by the  
13 People based on the facts that are the subject of the contempt action by the  
14 People against the Defendant. The continuing effect of the provisions of this  
15 paragraph (Paragraph VII) is conditioned on Defendant's performance as stated  
16 in Paragraph V ("Defendant's Performance"). This paragraph (Paragraph VII) has  
17 no effect on the ability of Parties to enforce the terms of the Stipulation.

18 **VIII. Authority to Enter Agreement**

19 Each signatory to this Stipulation certified that he or she is fully authorized  
20 by the Party he or she represents to enter into this Stipulation, to execute it on  
21 behalf of the Party represented and legally to bind that Party.

22 **IX. Entire Agreement**

23 This Stipulation contains the entire agreement and understanding of the  
24 Parties with respect to the entire subject matter hereof and any and all prior  
25 discussions, negotiations, commitments and understandings related hereto. No  
26 representations, oral or otherwise, express or implied, other than those contained  
27 herein have been made by any Party hereto. No other agreements not  
28

1 specifically referred to herein, oral or otherwise, shall be deemed to exist or to  
2 bind any of the Parties.

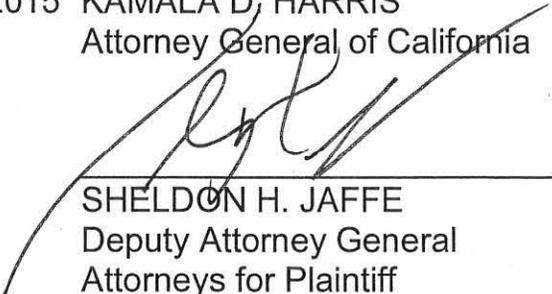
3 **X. Counterparts: Facsimile Signatures**

4 This Stipulation may be executed in counterparts and by facsimile, each of  
5 which shall be deemed an original, and all of which, when taken together, shall  
6 constitute one and the same document.

7 **APPROVAL BY PLAINTIFF**

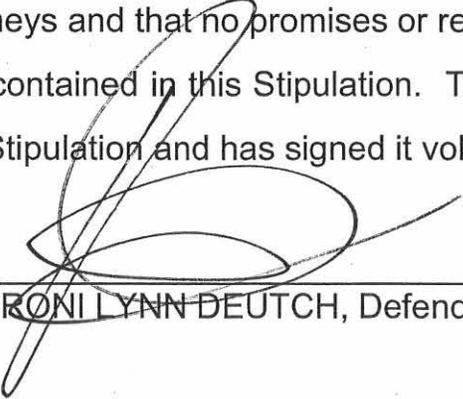
8 Plaintiff hereby agrees to all the terms of this Stipulation and acknowledges  
9 that no promises or representations have been made other than what is contained  
10 in this Stipulation.

11 Dated: 8/7, 2015 KAMALA D. HARRIS  
12 Attorney General of California

13  
14  
15   
16 \_\_\_\_\_  
17 SHELDON H. JAFFE  
18 Deputy Attorney General  
19 Attorneys for Plaintiff  
20 The People of the State of California

21 **APPROVAL BY DEFENDANT**

22 The Defendant hereby agrees to all the terms of this Stipulation.  
23 Furthermore, Defendant acknowledges that she has had a full opportunity to  
24 discuss this Stipulation with her attorneys and that no promises or representations  
25 have been made other than what is contained in this Stipulation. The Defendant  
26 fully agrees with the contents of this Stipulation and has signed it voluntarily.

27 Dated: 8-7, 2015  
28   
\_\_\_\_\_  
RONI LYNN DEUTCH, Defendant

1 **APPROVAL BY DEFENDANT'S ATTORNEYS**

2  
3 The attorneys for the Defendant have read the Stipulation and each of its  
4 terms in full, and have discussed its contents fully with the Defendant. The terms  
5 set forth in this Stipulation accurately and completely set forth the terms of the  
6 Stipulation.

7 Dated: 8/7, 2015

SEGAL & ASSOCIATES, PC

8  
9 

10 MALCOLM S. SEGAL  
11 EMILY E. DORINGER  
12 Attorneys for Defendant  
13 Roni Lynn Deutch

14 Dated: 8-7-14, 2015

ROSENFELD LAW FIRM

15  
16 

17 KENNETH L. ROSENFELD  
18 Attorneys for Defendant  
19 Roni Lynn Deutch

20 **ORDER**

21 GOOD CAUSE APPEARING, the Court hereby finds that:

22 A resolution of this matter is appropriate as set forth in the terms of the  
23 written Stipulation for Settlement of Special Civil Proceeding and Entry of  
24 [Proposed] Order filed by the Parties to this action.

25 IT IS HEREBY ORDERED that:  
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1           1.     The Contempt portion of this proceeding is stayed until the earlier of:  
2 (a) a dismissal of the contempt portion of this proceeding pursuant to Paragraph  
3 four of this Order; or (b) three years from date of this Order.

4  
5           2.     Within three years of the date of this Order, the Defendant shall  
6 complete 350 hours of volunteer service. The Defendant may complete the  
7 volunteer service with any organization of her choice approved by the Court. The  
8 Defendant shall file and serve a list of proposed organization(s) within 14 days of  
9 this order.

10  
11          3.     The Defendant shall file and serve annual reports from the approved  
12 volunteer organization(s), confirming the number of volunteer hours completed.  
13 The initial annual report shall be filed and served within one year of the date of  
14 this Order, and annually each year thereafter until the requisite 350 hours of  
15 volunteer service are completed and proof of such completion is filed and served.

16  
17          4.     Upon the Court's finding that Ms. Deutch has timely completed the  
18 volunteer service ordered by Paragraph two of this Order, all of the contempt  
19 counts set forth in the Affidavit of Sheldon H. Jaffe Setting Forth Amended List of  
20 Counts filed September 10, 2014 shall be dismissed with prejudice. Except as  
21 otherwise provided herein, each side shall bear their own costs, including  
22 attorneys' fees, and Plaintiff is expressly prohibited from seeking or collecting any  
23 fees or costs pursuant to Code of Civil Procedure section 1218, subdivision (a).  
24 Should Defendant fail to complete the 350 hours of volunteer service within three  
25 years of the date of this Order, this paragraph shall be null and void, the contempt  
26  
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1 charges shall not be dismissed, and the Plaintiff shall not be prohibited from  
2 seeking fees and costs.

3  
4 5. Should Defendant fail to complete the 350 hours of volunteer service  
5 within three years of the date of this Order, the stay of the Contempt proceeding,  
6 Paragraph one, shall be lifted.

7  
8 6. Within three years of the date this Order, the Defendant will remit to  
9 the County of Sacramento the sum of ten thousand dollars (\$10,000.00) as  
10 reimbursement to the County for attorneys' fees and costs incurred in this matter.

11 7. Up to \$10,000 total of funds held in the following accounts held by  
12 JPMorgan Chase & Co. (the Bank) subject to the Court's order on April 20, 2011,  
13 shall be paid to the County of Sacramento as partial reimbursement to the County  
14 for attorneys' fees and costs incurred in this matter. The Accounts are:

15  
16 Attorney Roni Lynn Deutch, Account Number \*\*\*\*\*7482

17 Benigirl LLC, Account Number \*\*\*\*\*5458

18 TLF Ventures LLC, Account Number \*\*\*\*\*5466

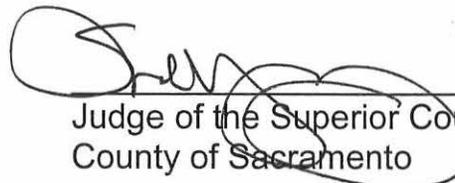
19 Niko & Inu LLC Account Number \*\*\*\*\*5474

20  
21 The Bank shall provide the Defendant with a check or money order payable to  
22 the County of Sacramento, for the lesser of: (a) the full amount of the funds  
23 available; or (b) \$10,000. Defense Counsel shall thereafter present payment to  
24 the County. Notice of the completion of the transaction shall be filed and served.  
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1           8.     The funds paid to the County pursuant to Paragraph seven shall be  
2 subtracted from the \$10,000 due to the County from Defendant pursuant to  
3 Paragraph six.  
4

5           9.     At the conclusion of the three-year period following entry of this  
6 Order, the Defendant shall be discharged from any obligation to reimburse  
7 Sacramento County any amount still due on the sum of ten thousand dollars  
8 (\$10,000.00) upon a sufficient showing to the Court *in camera* and under oath  
9 that she does not have the ability to pay any amount still due.  
10

11  
12 Dated: 8/7/15

13   
14 Judge of the Superior Court  
15 County of Sacramento  
16 SHELLEYANNE W.L. CHANG  
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