

DISCIPLINARY BOARD
WASHINGTON STATE BAR ASSOCIATION

In re

DOMINIQUE LOUISE ENG JINHONG,

Lawyer (Bar No. 28293).

Proceeding No. 19#00046

STIPULATION TO DISBARMENT

Following settlement conference conducted
under ELC 10.12(h)

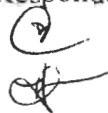
Under Rule 9.1 of the Washington Supreme Court's Rules for Enforcement of Lawyer Conduct (ELC), and following a settlement conference conducted under ELC 10.12(h), the following Stipulation to disbarment is entered into by the Office of Disciplinary Counsel (ODC) of the Washington State Bar Association (Association) through disciplinary counsel Francesca D'Angelo and Respondent lawyer Dominique Louise Eng Jinhong.

Respondent understands that Respondent is entitled under the ELC to a hearing, to present exhibits and witnesses on Respondent's behalf, and to have a hearing officer determine the facts, misconduct and sanction in this case. Respondent further understands that Respondent 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 outcome more favorable or less favorable to Respondent. Respondent chooses to resolve this

1 proceeding now by entering into the following stipulation to facts, misconduct and sanction to
2 avoid the risk, time, and expense attendant to further proceedings.

3 I. ADMISSION TO PRACTICE

4 1. Respondent was admitted to practice law in the State of Washington on November 4,

5 ~~1988~~. 1998 

6 2. On March 11, 2022, the Supreme Court suspended Respondent from the practice of
7 law pursuant to ELC 7.2(a)(1).

8 II. STIPULATED FACTS

9
10 3. On February 24, 2023, the Kitsap County Prosecuting Attorney filed a First
11 Amended Information charging Respondent with one count of Unlawful Possession of Payment
12 Instruments as follows:

13 On or between November 30, 2017 and January 31, 2018, in the
14 County of Kitsap, State of Washington, the above-named
15 Defendant with intent either to deprive the person of possession of
16 such payment instrument or to commit theft, forgery, or identify
17 theft, (a) did possess two or more checks or other payment
18 instruments in the name of a person or entity, or with the routing
19 number or account number of a person or entity, without the
20 permission of the person or entity to possess such payment,
21 instrument, and/or (b) with the intent to use the payment
22 instruments to commit theft, forgery, or identity theft, did possess
23 one or more checks or other payment instruments in the name of a
24 fictitious person or entity, or with fictitious routing number or
account number of a person or entity; contrary to the Revised Code
of Washington 9A.56.320(2)(a).

20 4. Unlawful Possession of Payment Instruments is a Class C Felony.
21 RCW 9A.56.320.2.

22 5. On February 24, 2023, Respondent pleaded guilty to the charge of Unlawful
23 Possession of Payment Instruments.

1 6. The court found Respondent's plea of guilty to be knowingly, intelligently, and
2 voluntarily made.

3 7. On February 24, 2023, the court found Respondent guilty as charged in the First
4 Amended Information.

5 8. A contested restitution hearing, currently scheduled for June 30, 2023, will be held in
6 the criminal matter to determine what restitution Respondent owes the victims of Respondent's
7 crimes.

8 9. A civil judgment was entered against Respondent as a result of proceedings in *In re*
9 *Estate of Zora P. Palermi*, No. 18-4-00395-18 (Kitsap County Superior Court).

10 10. Respondent has no prior disciplinary history.

11 III. STIPULATION TO MISCONDUCT

12 11. By committing the crime of Unlawful Possession of Payment Instruments,
13 Respondent violated RPC 8.4(b).

14 IV. APPLICATION OF ABA STANDARDS

15 12. The following American Bar Association Standards for Imposing Lawyer Sanctions
16 (1991 ed. & Feb. 1992 Supp.) apply to this case:

17 ***5.1 Failure to Maintain Personal Integrity***

18 5.11 Disbarment is generally appropriate when:

- 19 (a) a lawyer engages in serious criminal conduct, a necessary element of which
20 includes intentional interference with the administration of justice, false
21 swearing, misrepresentation, fraud, extortion, misappropriation, or theft;
22 or the sale, distribution or importation of controlled substances; or the
23 intentional killing of another; or an attempt or conspiracy or solicitation of
24 another to commit any of these offenses; or
- 21 (b) a lawyer engages in any other intentional conduct involving dishonesty,
22 fraud, deceit, or misrepresentation that seriously adversely reflects on the
23 lawyer's fitness to practice.

24 5.12 Suspension is generally appropriate when a lawyer knowingly engages in
criminal conduct which does not contain the elements listed in Standard
5.11 and that seriously adversely reflects on the lawyer's fitness to practice.

1 5.13 Reprimand is generally appropriate when a lawyer knowingly engages in
2 any other conduct that involves dishonesty, fraud, deceit, or
misrepresentation and that adversely reflects on the lawyer's fitness to
practice law.

3 5.14 Admonition is generally appropriate when a lawyer engages in any other
4 conduct that reflects adversely on the lawyer's fitness to practice law.

5 13. Respondent's crime constitutes serious criminal conduct, a necessary element of
6 which includes intentional interference with the administration of justice, false swearing,
7 misrepresentation, fraud, extortion, misappropriation, or theft.

8 14. The presumptive sanction is disbarment under ABA Standard 5.11(a).

9 15. Aggravating and mitigating factors do not require a departure from the presumptive
10 sanction.

11 **V. STIPULATED DISCIPLINE**

12 16. The parties stipulate that Respondent be disbarred.

13 **VI. CONDITIONS OF REINSTATEMENT**

14 17. Reinstatement from disbarment is conditioned on payment of costs and expenses, as
15 provided below.

16 18. Under Admission and Practice Rule (APR) 25(b), when prior to disbarment a lawyer
17 has been suspended from the practice of law pursuant to the provisions of Title 7 of the ELC, the
18 period of such suspension shall be credited toward the five year period during which no petition
19 for reinstatement may be filed. As recited in paragraph 2, above, Respondent has been suspended
20 under ELC 7.2(a)(1) since March 11, 2022.

21 **VII. COSTS AND EXPENSES**

22 19. Respondent shall pay attorney fees and administrative costs of \$1,500 in accordance
23 with ELC 13.9(i). The Association will seek a money judgment under ELC 13.9(l) if these costs
24 are not paid within 30 days of approval of this stipulation. Reinstatement from disbarment is

1 conditioned on payment of costs.

2 **VIII. VOLUNTARY AGREEMENT**

3 20. Respondent states that prior to entering into this Stipulation Respondent had an
4 opportunity to consult independent legal counsel regarding this Stipulation, that Respondent is
5 entering into this Stipulation voluntarily, and that no promises or threats have been made by ODC,
6 the Association, nor by any representative thereof, to induce the Respondent to enter into this
7 Stipulation except as provided herein.

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

10 **IX. LIMITATIONS**

11 22. This Stipulation is a compromise agreement intended to resolve this matter in
12 accordance with the purposes of lawyer discipline while avoiding further proceedings and the
13 expenditure of additional resources by the Respondent and ODC. Both the Respondent and ODC
14 acknowledge that the result after further proceedings in this matter might differ from the result
15 agreed to herein.

16 23. This Stipulation is not binding upon ODC or the respondent as a statement of all
17 existing facts relating to the professional conduct of the Respondent, and any additional existing
18 facts may be proven in any subsequent disciplinary proceedings.

19 24. This Stipulation results from the consideration of various factors by both parties,
20 including the benefits to both by promptly resolving this matter without the time and expense of
21 hearings, Disciplinary Board appeals, and Supreme Court appeals or petitions for review. As
22 such, approval of this Stipulation will not constitute precedent in determining the appropriate
23 sanction to be imposed in other cases; but, if approved, this Stipulation will be admissible in

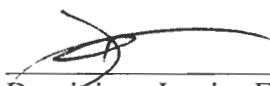
1 subsequent proceedings against Respondent to the same extent as any other approved Stipulation.

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

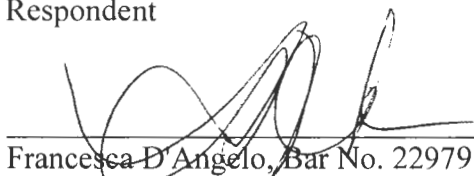
6 26. If this Stipulation is approved by the Disciplinary Board and Supreme Court, it will
7 be followed by the disciplinary action agreed to in this Stipulation. All notices required in the
8 Rules for Enforcement of Lawyer Conduct will be made.

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

13 WHEREFORE the undersigned being fully advised, adopt and agree to this Stipulation to
14 Disbarment as set forth above.

15 
16 _____
17 Dominique Louise Eng Jinhong, Bar No. 28293
Respondent

Dated: 6/8/2023

18 
19 _____
20 Francesca D'Angelo, Bar No. 22979
21 Managing Disciplinary Counsel

Dated: 6/8/2023