

FILED

May 7, 2025

Disciplinary
Board

Docket # 029

DISCIPLINARY BOARD
WASHINGTON STATE BAR ASSOCIATION

In re

JEREMIAH SPENCER STYLES,

Lawyer (Bar No. 49543).

Proceeding No. 24#00028

ODC File Nos. 23-00251, 23-01344, 24-00078, 24-00412

STIPULATION TO THREE-YEAR
SUSPENSION

*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 Three-Year Suspension is entered into by the Office of Disciplinary Counsel (ODC) of the Washington State Bar Association (Association) through disciplinary counsel Henry Cruz, Respondent's Counsel Pedro Melesio, and Respondent lawyer Jeremiah Spencer Styles.

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,

1 the Supreme Court. Respondent further understands that a hearing and appeal could result in an
2 outcome more favorable or less favorable to Respondent. Respondent chooses to resolve this
3 proceeding now by entering into the following stipulation to facts, misconduct, and sanction to
4 avoid the risk, time, and expense attendant to further proceedings.

5 **I. ADMISSION TO PRACTICE**

6 1. Respondent was admitted to practice law in the State of Washington on September 18,
7 2015. On October 29, 2024, the Washington Supreme Court suspended Respondent from the
8 practice of law for the duration of these proceedings.

9 **II. STIPULATED FACTS**

10 2. Respondent is the owner and managing lawyer at Styles Law PLLC, which primarily
11 handles personal injury and immigration cases.

12 3. Respondent provided insufficient supervision of staff lawyers, nonlawyer
13 professionals, or support staff working on immigration matters to make sure their conduct
14 comported with the Rules of Professional Conduct (RPC).

15 Kirill Dziuba Grievance

16 4. On or about December 8, 2022, Respondent agreed to represent Kirill Dziuba and
17 Dziuba's spouse (collectively "the Dziubas"), nationals of Russia, in an application for asylum in
18 removal proceedings.

19 5. The Dziubas' master calendar hearing was scheduled for January 23, 2023, in
20 Sacramento, California.

21 6. Respondent also agreed to file a motion to change the venue of the Dziubas' removal
22 proceedings from Sacramento, California to Seattle, Washington prior to the January 23, 2023
23 hearing.

1 7. Respondent charged a flat fee of \$8,500 for the representation in removal proceedings
2 and the change of venue motion.

3 8. Respondent received a payment of \$4,000 from the Dziubas towards the \$8,500 flat
4 fee.

5 9. On January 17, 2023, Respondent electronically filed a notice of appearance with the
6 immigration court.

7 10. Neither Respondent nor anyone else at Styles Law ever drafted the motion to change
8 venue.

9 11. Respondent did not inform the Dziubas that the motion to change venue was not filed
10 prior to the January 23, 2023 hearing.

11 12. Respondent failed to take any action to ensure the Dziubas would appear at the January
12 23, 2023 hearing in Sacramento.

13 13. Respondent failed to take any action to ensure the Dziubas' interests were otherwise
14 protected in their removal proceedings.

15 14. Neither Respondent nor the Dziubas appeared at the January 23, 2023 hearing in
16 Sacramento.

17 15. The court ordered the Dziubas removed in absentia.

18 16. Respondent refunded the \$4,000 payment made by Dziuba.

19 17. On January 31, 2023, Respondent filed a motion to withdraw with the court.

20 18. In the motion to withdraw, Respondent stated that Respondent had "communicated
21 with and made all attempts to assist the [Dziubas] in preparing for any matter regarding their
22 pending application for asylum," but that "irreconcilable differences have arisen that make
23 continued representation of the [Dziubas] impossible" and that "it has become impossible to

properly represent [the Dziubas] effectively.”

19. These statements to the court were false. Respondent never communicated with the Dziubas and never “made all attempts to assist” the Dziubas in their matter.

20. The Dziubas hired Zara Sarkisova to reopen their removal proceedings.

21. On April 17, 2023, Sarkisova filed a motion to reopen the removal order based on ineffective assistance of counsel. The court granted the motion to reopen due to no response by the government, and Sarkisova secured a change of venue to Seattle

False Statements to ODC

22. On February 22, 2023, Dziuba filed a grievance against Respondent.

23. On March 10, 2023, Respondent received a request from ODC for a written response to the grievance.

24. In a written response to ODC dated April 25, 2023, Respondent falsely stated that Styles Law “began diligently working on changing venue” in the Dziubas matter.

25. In Respondent’s April 25, 2023 written response, Respondent also falsely stated that, prior to January 17, 2023, “[Respondent’s] office attempted contact with [the Dziubas] and again to [sic] [Chernetsky] to provide us with valuable information to assist them with their case but received no further correspondence.”

Marlubys Perez Chuello

26. Marlubys Perez Chuello (Marlubys) and Marluby’s child, Fabiana Vargas Perez, both nationals of Venezuela, entered the United States in December 2021 and were subsequently placed in removal proceedings.

27. On or about June 1, 2022, Respondent agreed to represent Marlubys and Fabiana in an application for asylum in removal proceedings for a flat fee of \$9,000.

1 28. On June 7, 2022, Respondent filed a notice of appearance as Marluby's "primary
2 attorney" in the removal matter.

3 29. On July 21, 2022, Respondent filed Marluby's application for asylum and withholding
4 of removal (Form I-589).

5 30. Respondent signed the Form I-589 as the preparer.

6 31. On August 9, 2022, Aaron Vasey, an associate lawyer at Styles Law, appeared with
7 Marlubys and Fabiana at a master calendar hearing.

8 32. At the August 9, 2022 hearing, Vasey told the immigration judge that there were "a
9 few clerical changes we'd like to make to the I-589."

10 33. The immigration judge instructed Vasey to file the amendments prior to the individual
11 (i.e. merits) hearing scheduled for May 18, 2023.

12 34. Vasey left Styles Law in September 2022.

13 35. Respondent continued to represent Marlubys and Fabiana in the removal matter.

14 36. Respondent was not aware of the errors in Marlubys's Form I-589 or assumed Vasey
15 had corrected the errors in Marlubys's Form I-589.

16 37. Respondent did not file the amendments or confirm that the amendments had been
17 filed prior to the merits hearing.

18 38. Respondent did not review the Form I-589 with Marlubys in preparation for the merits
19 hearing.

20 39. At the May 18, 2023 merits hearing, Respondent told the immigration judge that there
21 were "mistakes" and "scrivener errors" in the preparation of Marlubys's I-589 and that "I own
22 the mistakes that exist in this application."

23 40. Respondent further stated to the immigration judge:

1 I ask that the court judge [Marlubys]'s credibility based on her presentation today
2 of her testimony and mostly based on her written declaration which she would
3 have had more time to prepare, more time to be able to have translated into a
4 language that is not her first language, as opposed to the I-589 which is often
5 prepared in a hasty way in order to be able to submit it ... for a master calendar
6 hearing.

7 41. The court found Marlubys's testimony not credible, in part, based on inconsistencies
8 between Marlubys's Form I-589 and Marlubys's written declaration and testimony that were
9 attributed to the errors Respondent failed to correct.

10 42. The court denied Marlubys's asylum application and ordered Marlubys and Fabiana
11 removed.

12 Eybber Perez Chuello

13 43. Eybber Perez Chuello (Eybber), Marlubys's other child and a national of Venezuela,
14 was apprehended by immigration authorities shortly after entering the United States in May 2022.

15 44. Eybber, who was 16 years old at the time of entry, was designated an "unaccompanied
16 child" and released to the care of Marlubys.

17 45. Eybber's father abandoned Eybber in Venezuela.

18 46. Due to being abandoned by one parent, Eybber had the opportunity to seek Special
19 Immigrant Juvenile (SIJ) status and ultimately lawful permanent residency.

20 47. On September 8, 2022, Eybber signed an agreement for Alex Romero of the Northwest
21 Immigrant Rights Project to represent Eybber in Eybber's immigration matter.

22 48. On April 17, 2023, the U.S. Department of Homeland Security initiated removal
23 proceedings against Eybber, then 17, by filing a charging document with the immigration court.

24 49. Due to Eybber's unaccompanied child designation, Eybber was eligible to initially
seek asylum with U.S. Citizenship and Immigration Services (USCIS) and postpone or dismiss
removal proceedings.

1 50. On May 1, 2023, at Marlubys's request, Respondent filed the following documents
2 with the immigration court:

- 3 (a) a notice of appearance as Eybber's lawyer in removal proceedings;
- 4 (b) a motion to consolidate Eybber's and Marlubys's removal cases;
- 5 (c) written pleadings responsive to Eybber's charging document; and
- 6 (d) an asylum application in Eybber's name.

7 51. By filing the May 1, 2023 documents, Respondent placed Eybber at risk of being
8 ordered removed at the May 18, 2023 merits hearing.

9 52. A removal order would preclude Eybber from applying for lawful permanent
10 residency through SIJS and would preclude Eybber from applying for asylum before USCIS.

11 53. In the motion to consolidate, Respondent stated to the court that "[e]ach respondent
12 hereby moves the court to consolidate their cases."

13 54. In the written pleadings, Respondent stated to the court that Respondent explained the
14 consequences of failing to appear for a removal hearing and of knowingly filing a frivolous
15 asylum application to Eybber.

16 55. In Eybber's purported asylum application, Respondent declared that Respondent
17 prepared the application "at the request of" Eybber.

18 56. In Eybber's purported asylum application, Respondent declared that the application
19 was read to Eybber.

20 57. Respondent's statements to the court at paragraphs 54 through 57 were false.

21 58. Neither Respondent nor anyone else at Styles Law ever met or spoke with Eybber.

22 59. Respondent did not execute an agreement to represent Eybber.

23 60. Respondent did not receive Eybber's consent to the representation or to the

1 consolidation.

2 61. Neither Respondent nor anyone else at Styles Law reviewed the written pleadings to
3 the charging document or the purported asylum application with Eybber.

4 62. Eybber did not sign Eybber's purported asylum application; instead, Marlubys signed
5 Eybber's purported asylum application.

6 63. An applicant 14 years of age or older "must sign" their application for immigration
7 benefits; a parent or legal guardian may only sign for a person who is less than 14 years old.

8 64. The court granted the motion to consolidate and included Eybber in the May 18, 2023
9 merits hearing.

10 65. After the May 1, 2023 filings, Respondent became aware that Romero represented
11 Eybber.

12 66. On May 11, 2023, Respondent filed a motion for withdrawal and substitution of
13 counsel in Eybber's matter and a motion to sever Eybber's and Marlubys's cases.

14 67. At the May 18, 2023 merits hearing, the court denied both motions because Marlubys
15 wanted the cases consolidated.

16 68. Eybber was ordered removed with Marlubys and Fabiana.

17 Federico Alcantar Aguilar Grievance

18 69. On or about April 26, 2019, Respondent agreed to represent Federico Alcantar Aguilar
19 (Alcantar Aguilar) in removal proceedings for a flat fee of \$11,000. Respondent later discounted
20 the total flat fee to \$9,000.

21 70. Respondent also agreed to prepare and file the following documents with U.S.
22 Citizenship and Immigration Services (USCIS) on behalf of Alcantar Aguilar: Form I-130
23 (Petition for Alien Relative based on Alcantar Aguilar's marriage to Cecilia Salmeron Oliva, a

1 U.S. citizen); Form I-212 (Application for Permission to Reapply for Admission into the United
2 States After Deportation or Removal); and Form I-601 (Application for Waiver of Grounds of
3 Inadmissibility).

4 71. Because Alcantar Aguilar last entered the United States without inspection in 2005,
5 Alcantar Aguilar would have to leave the United States to obtain an immigrant visa through
6 approval of the Forms I-130, I-212, and I-601.

7 72. Respondent received the full payment of \$9,000 from Alcantar Aguilar.

8 73. On October 25, 2019, Respondent's firm filed Form I-130 on behalf of Alcantar
9 Aguilar and Salmeron Oliva with USCIS.

10 74. On March 5, 2020, Respondent appeared at a master calendar hearing with Alcantar
11 Aguilar and told the court that Alcantar Aguilar intended to file an application for cancellation of
12 removal.

13 75. At the March 5, 2020 hearing, the court set a deadline to file the application for
14 cancellation of removal by September 8, 2020, which Respondent orally acknowledged, and
15 scheduled the merits hearing for April 18, 2023.

16 76. Respondent did not file the cancellation of removal application by September 8, 2020.

17 77. In an order dated October 5, 2020, the court:

18 (a) extended the deadline to file the cancellation of removal application to January 29,
19 2021,

20 (b) ordered that any request for voluntary departure also be submitted by January 29,
21 2021, and

22 (c) advised that failure to file the cancellation of removal application or request voluntary
23 departure by the deadline would result in the court deeming all prospective

1 applications for relief abandoned and ordering Alcantar Aguilar removed.

2 78. The October 5, 2020 order was mailed to Respondent but returned as undeliverable.

3 79. Respondent changed Respondent's office address earlier in 2020 but may not have
4 provided the new address to the court until sometime after October 2020.

5 80. In an order dated January 27, 2021, the court reminded Respondent of the January 29,
6 2021 deadline to file the cancellation of removal application and informed Respondent that the
7 "court sent you deadline notice on 5 Oct 2020 and letter was returned."

8 81. Respondent received the January 27, 2021 order.

9 82. Respondent did not file the cancellation of removal application or a request for
10 voluntary departure.

11 83. Respondent did not inform Alcantar Aguilar that Respondent had failed to file the
12 cancellation of removal application or the voluntary departure request by the court's deadline.

13 84. Voluntary departure would have disposed of the need for Alcantar Aguilar to seek a
14 Form I-212 waiver.

15 85. On November 29, 2021, USCIS approved the Form I-130.

16 86. On July 29, 2022, Respondent's firm filed Alcantar Aguilar's immigrant visa
17 application with the National Visa Center (NVC).

18 87. Respondent was informed by the NVC that a visa interview would not be scheduled
19 until all required financial and civil documents were submitted.

20 88. Respondent did not submit any of the required financial or civil documents with the
21 NVC.

22 89. On October 6, 2022, Respondent was informed that the immigrant visa application
23 was filed and that the next step was to file a Form I-601A waiver application along with

1 supporting documents, including Salmeron Olivas's hardship statement, that were in the client
2 file.

3 90. Alcantar Aguilar's removal proceedings had to be administratively closed or
4 dismissed before Alcantar Aguilar could apply for a Form I-601A waiver.

5 91. On November 30, 2022, Respondent was reminded that Alcantar Aguilar had a merits
6 hearing in 2023 and that a motion to continue or prosecutorial discretion should be requested.

7 92. A prosecutorial discretion request should have been filed as soon as possible, but
8 Respondent did not submit a prosecutorial discretion request until March 2023.

9 93. On March 21, 2023, Respondent was again reminded of the April 18, 2023 merits
10 hearing date and of the need to file the Form I-601A.

11 94. On March 24, 2023, with less than a month before the merits hearing, Respondent
12 submitted a prosecutorial discretion request seeking the government to join in a motion to dismiss
13 removal proceedings.

14 95. In the prosecutorial discretion request, Respondent provided only two paragraphs of
15 any substance.

16 96. In the prosecutorial discretion request, Respondent incorrectly stated that:

17 (a) Alcantar Aguilar entered the United States in 2017,

18 (b) Alcantar Aguilar was seeking asylum, and

19 (c) Alcantar Aguilar had no criminal history.

20 97. Alcantar Aguilar entered the United States in 2005, was not seeking asylum, and did
21 have a criminal record.

22 98. Respondent had access to all the information at paragraph 97 in the client file prior to
23 submitting the prosecutorial discretion request.

1 99. Respondent failed to address the impact that Alcantar Aguilar’s removal would have
2 on Salmeron Olivas in the prosecutorial discretion request and failed to submit any documents
3 supporting hardship to Salmeron Olivas with the prosecutorial discretion request.

4 100. On March 28, 2023, Respondent received an email from an assistant chief counsel
5 with the government asking for information about Alcantar Aguilar’s criminal history and
6 advising that biometrics processing still needed to be initiated to conduct required background
7 checks.

8 101. On March 29, 2023, Respondent submitted a half-page statement by Alcantar
9 Aguilar on Alcantar Aguilar’s criminal history to the government.

10 102. On March 30, 2023, Respondent mailed a biometrics initiation request to USCIS
11 in Yakima, Washington based on an asylum application that Respondent represented was
12 “previously filed ... with the Immigration Court.”

13 103. Respondent’s statement to USCIS was inaccurate because no asylum application
14 was ever filed with the immigration court.

15 104. Respondent should have mailed the biometrics request to a P.O. Box in Lincoln,
16 Nebraska.

17 105. USCIS rejected the biometrics request because it was mailed to the wrong address.

18 106. The biometrics request should have been submitted at least six months prior to the
19 merits hearing.

20 107. On April 10, 2023, Respondent received an email from the assistant chief counsel
21 asking what applications for relief had Respondent filed for the merits hearing.

22 108. Respondent did not respond to the assistant chief counsel’s April 10, 2023 email.

23 109. The government declined prosecutorial discretion.

1 110. On or about April 10, 2023, Respondent filed a motion to continue the April 18,
2 2023 merits hearing based on the pending biometrics request.

3 111. In the motion to continue, Respondent stated that Alcantar Aguilar “has not
4 abandoned his asylum application ... [and] has timely submitted additional evidence and a pre-
5 hearing statement supporting their claim.”

6 112. Respondent had not filed additional evidence or a pre-hearing statement prior to
7 the motion to continue.

8 113. No asylum application was ever filed with the court.

9 114. An immigration judge can grant a motion for administrative closure without the
10 government’s agreement.

11 115. Respondent did not file a motion for administrative closure.

12 116. On April 11, 2023, Respondent stated in an email that Respondent was “pretty
13 confused” as to what was going to happen at the April 18, 2023 hearing and did not know how
14 Alcantar Aguilar was in removal proceedings.

15 117. On April 13, 2023, the court cancelled the April 18, 2023 hearing and ordered
16 Alcantar Aguilar removed to Mexico because no application for relief was filed by the court’s
17 January 21, 2021 deadline.

18 118. On or about April 17, 2023, Respondent filed a “Pre-Hearing Memorandum in
19 Support of Application for Adjustment of Status with Waiver of Inadmissibility,” in which
20 Respondent stated that Alcantar Aguilar was eligible for adjustment of status.

21 119. Alcantar Aguilar was not eligible for adjustment of status.

22 120. On or about April 17, 2023, Respondent filed a motion to reconsider the court’s
23 removal order based on the following grounds:

- 1 (a) Alcantar Aguilar had an approved Form I-130,
2 (b) the NVC had not yet scheduled a visa interview, and
3 (c) Alcantar Aguilar “has not abandoned his asylum application.”

4 121. On May 9, 2023, the court denied the motion to reconsider because Alcantar
5 Aguilar was ineligible for adjustment of status and never filed an application for asylum with the
6 court.

7 122. Respondent did not promptly inform Alcantar Aguilar of the removal order or of
8 the denial of the motion to reconsider.

9 123. Respondent never filed the waiver applications.

10 124. Respondent never completed the immigrant visa matter.

11 125. Respondent did not keep Alcantar Aguilar reasonably informed about the status of
12 immigrant visa matter.

13 126. After the filing of the Formal Complaint, Respondent refunded \$4,500 to Alcantar
14 Aguilar.

15 127. In November 2023, Alcantar Aguilar hired Shane Crager to represent Alcantar
16 Aguilar in the immigration matters.

17 128. Crager filed a motion to reopen based on ineffective assistance of counsel by
18 Respondent.

19 129. On February 13, 2024, the court granted the motion to reopen, finding that
20 “[Respondent’s] ineffective assistance is clear from the record and particularly egregious.”

21 Lester Aguilar-Rivera Grievance

22 130. On May 7, 2022, Respondent agreed to represent Lester Aguilar-Rivera, a citizen
23 of Nicaragua, and Aguilar-Rivera’s spouse and child (hereinafter “the Aguilar-Riveras”) in an

1 application for asylum in removal proceedings.

2 131. On May 28, 2022, Respondent filed an asylum application on behalf of the
3 Aguilar-Riveras.

4 132. The court scheduled a merits hearing on the asylum application for December 20,
5 2023.

6 133. As asylum applicants, the Aguilar-Riveras were required to provide biometrics to
7 initiate mandatory background and identity checks. Failure to timely comply with biometrics
8 processing requirements without good cause will result in dismissal of the asylum application.

9 134. Respondent did not initiate biometrics processing prior to the merits hearing.

10 135. In August 2023, Respondent assigned the Aguilar-Rivera matter to Tanisha
11 Sudarshan, who had recently obtained a Rule 9 license as a law school graduate and had no prior
12 immigration or litigation experience.

13 136. At some point prior to the merits hearing, Respondent assigned Adam Dennaoui,
14 an associate lawyer at Styles Law who had only two months of immigration law experience, to
15 supervise Sudarshan in the matter.

16 137. On December 19, 2023, Dennaoui and Sudarshan filed notices of appearance as
17 the “non-primary attorney/representative” of the Aguilar-Riveras for purposes of the December
18 20, 2023 merits hearing.

19 138. At the December 20, 2023 merits hearing, Dennaoui and Sudarshan appeared with
20 the Aguilar-Riveras.

21 139. At the conclusion of the merits hearing, the court indicated that it was inclined to
22 grant the asylum application but learned that biometrics processing had not yet been initiated.

23 140. The court granted additional time to complete biometrics and instructed Dennaoui

1 and Sudarshan to initiate biometrics processing and inform the court and the government once
2 biometrics were taken.

3 141. The court also ordered the government to inform the court by February 1, 2024,
4 whether background checks were clear.

5 142. On December 20, 2023, after the merits hearing, Respondent and others at the firm
6 received a message from Sudarshan that biometrics needed to be completed.

7 143. The request to initiate biometrics processing was not mailed until January 10,
8 2024.

9 144. Sudarshan left the office to study for the bar exam and was unavailable after
10 January 10, 2024.

11 145. Sudarshan did not return to the office until March 4, 2024.

12 146. Respondent did not ensure that someone handled the Aguilar-Riveras' matter
13 while Sudarshan was out.

14 147. No biometrics appointment was scheduled by February 1, 2024.

15 148. On February 7, 2024, having heard from neither party, the court ordered
16 Respondent to provide the court with proof of the completion of biometrics, or evidence that
17 diligent efforts had been taken to complete biometrics, by February 14, 2024.

18 149. The court further stated in its February 7, 2024 order that if Respondent did not
19 comply with the order, the court would deem the Aguilar-Riveras' asylum application abandoned.

20 150. Respondent received the court's February 7, 2024 order by electronic service but
21 did not comply with the court's February 7, 2024 order.

22 151. On February 15, 2024, the court, having received no response from Respondent
23 regarding biometrics, deemed the asylum application abandoned and ordered the Aguilar-Riveras

1 removed to Nicaragua.

2 152. Respondent did not provide any supervision to the other lawyers or to any
3 nonlawyers in the Aguilar-Rivera matter between the December 20, 2023 hearing and the
4 February 15, 2024 removal order.

5 153. On February 16, 2024, Respondent filed a motion to reconsider the court's removal
6 order along with evidence of the January 10, 2024 biometrics request and stated that the reason
7 for the untimeliness was because Respondent was awaiting the biometrics appointment notice to
8 provide the court.

9 154. On February 20, 2024, the court denied the motion to reconsider, finding no factual
10 or legal error where Respondent acknowledged Respondent's failure to comply with the court's
11 deadline.

12 155. The Aguilar-Riveras promptly hired Luz Metz to reopen their removal
13 proceedings.

14 156. Metz filed a motion to reopen alleging ineffective assistance of counsel by
15 Respondent.

16 157. On March 19, 2024, the court found that Respondent provided ineffective
17 assistance to the Aguilar-Riveras and reopened their removal proceedings.

18 158. On April 3, 2024, the court granted asylum to the Aguilar-Riveras after biometrics
19 were completed.

20 **III. STIPULATION TO MISCONDUCT**

21 159. By failing to appear at the Dziubas' hearing, by failing to file a motion to change
22 the venue of the Dziubas' removal proceedings, and/or by failing to take other action to protect
23 the Dziubas' interests, Respondent violated RPC 1.3 and RPC 3.2.

1 160. By failing to inform the Dziubas of the status of their matter so that the Dziubas
2 could make arrangements to appear at their hearing, Respondent violated RPC 1.4.

3 161. By making false statements to the immigration court in the Dziubas' and Eybber's
4 matters, Respondent violated RPC 3.3(a)(1) and RPC 8.4(c).

5 162. By making false statements to ODC during the grievance investigation,
6 Respondent violated RPC 8.1(a), RPC 8.4(c), and RPC 8.4(d).

7 163. By failing to correct the errors in Marlubys's asylum application and/or by failing
8 to review Marlubys's asylum application prior to the individual hearing, Respondent violated
9 RPC 1.3.

10 164. By purporting to represent Eybber in Eybber's immigration matter without
11 authority, Respondent violated RPC 1.2(f).

12 165. By failing to timely file pleadings, by failing to timely seek prosecutorial
13 discretion, by failing to timely initiate biometrics processing, by failing to file a motion for
14 administrative closure, by failing to file required documents in the immigrant visa matter and/or
15 by failing to complete the immigrant visa matter, by filing pleadings with erroneous information,
16 by submitting a deficient prosecutorial discretion request, by submitting the biometrics initiation
17 request at the wrong location, and/or by failing to take other action to ensure Alcantar Aguilar's
18 removal and/or immigrant visa matter proceeded, Respondent violated RPC 1.3 and RPC 3.2.

19 166. By failing to inform Alcantar Aguilar of Respondent's failure to file the
20 cancellation of removal application and/or request for voluntary departure, by failing to promptly
21 inform Alcantar Aguilar of the removal order and/or the motion to reconsider denial, and/or by
22 failing to promptly inform Alcantar Aguilar of the status of the immigrant visa matter, Respondent
23 violated RPC 1.4.

1 167. By collecting a fee for work that was of no benefit to Alcantar Aguilar and/or by
2 failing to refund unearned fees after the termination of representation, Respondent violated RPC
3 1.5(a) and RPC 1.16(d).

4 168. By failing to timely complete biometrics processing for the Aguilar-Riveras in
5 their asylum matter and/or by failing to comply with the immigration court's February 7, 2024
6 order, Respondent violated RPC 1.3 and RPC 3.2.

7 169. By failing to make reasonable efforts to ensure that Styles Law had in effect
8 measures giving reasonable assurance that all lawyers at Styles Law conformed to the RPC, and/or
9 by failing to make reasonable efforts to ensure that Dennaoui's conduct conformed to the RPC,
10 Respondent violated RPC 5.1.

11 170. By failing to make reasonable efforts to ensure that Styles Law had in effect
12 measures giving reasonable assurance that the conduct of all nonlawyer staff at Styles Law was
13 compatible with Respondent's professional obligations, and/or by failing to make reasonable
14 efforts to supervise Sudarshan's handling of the Aguilar-Rivera matter to ensure that Sudarshan's
15 conduct was compatible with Respondent's professional obligations, Respondent violated RPC
16 5.3.

17 **IV. PRIOR DISCIPLINE**

18 171. Respondent has no prior discipline.

19 **V. APPLICATION OF ABA STANDARDS**

20 172. The following American Bar Association Standards for Imposing Lawyer
21 Sanctions (1991 ed. & Feb. 1992 Supp.) apply to this case: see Attachment A.

22 173. Respondent acted negligently in failing to correct errors in Marluby's asylum
23 application.

1 174. Respondent acted knowingly in all other misconduct.

2 175. Respondent's lack of diligence and failure to communicate with clients in multiple
3 client matters demonstrate a pattern of neglect.

4 176. Respondent's misconduct caused serious injury to all clients who were ordered
5 removed and had to undergo the stress and cost of hiring a new lawyer to avoid deportation.

6 177. Respondent's false statements to the court caused potential injury to the Dziubas
7 by making it appear they were uncooperative in the representation, caused Eybber's legal
8 proceedings to be unnecessarily taken up on appeal, reflect poorly on the profession, and diminish
9 confidence in the legal system.

10 178. Respondent's false statements to ODC were made with the intent to avoid
11 discipline and caused potentially serious injury to the discipline system and the public.

12 179. The presumptive sanction for Respondent's pattern of neglect and false statements
13 to ODC is disbarment.

14 180. The presumptive sanction for Respondent's other misconduct is suspension.

15 181. The following aggravating factors apply under ABA Standard 9.22:

16 (b) dishonest or selfish motive;

17 (c) a pattern of misconduct; and

18 (d) multiple offenses.

19 182. The following mitigating factors apply under ABA Standard 9.32:

20 (a) absence of a prior disciplinary record;

21 (c) personal or emotional problems (see attached Confidential Attachment B);

22 (g) character or reputation; and

23 (I) remorse.

1 183. It is an additional mitigating factor that Respondent has agreed to resolve the
2 matter at an early stage of the proceedings.

3 184. Based on the factors set forth above, the presumptive sanction should be mitigated
4 to a three-year suspension.

5 **VI. STIPULATED DISCIPLINE**

6 185. The parties stipulate that Respondent shall be suspended for a period of three years.

7 **VII. CONDITIONS OF REINSTATEMENT**

8 186. Reinstatement from suspension is conditioned on payment of restitution, costs and
9 expenses, as provided below.

10 **VIII. CONDITIONS OF PROBATION**

11 187. Respondent will be subject to probation for a period of two years beginning when
12 Respondent is reinstated to the practice of law and shall comply with the specific probation terms
13 set forth below.

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

18 Practice Monitor

19 189. During the period of probation, Respondent's practice will be supervised by a
20 practice monitor. The practice monitor must be a WSBA member with no record of public
21 discipline and who is not the subject of a pending public disciplinary proceeding.

22 190. The role of the practice monitor is to consult with and provide guidance to
23 Respondent regarding case management, office management, and avoiding violations of the Rules

1 of Professional Conduct, and to provide reports and information to the Probation Administrator
2 regarding Respondent's compliance with the terms of probation and the RPC. The practice
3 monitor does not represent the Respondent.

4 191. At the beginning of the probation period, the Probation Administrator will select a
5 lawyer to serve as practice monitor for the period of Respondent's probation.

6 (a) Initial Challenge: If, within 15 days of the written notice of the selection of a practice
7 monitor, Respondent sends a written request to the Probation Administrator that
8 another practice monitor be selected, the Probation Administrator will select another
9 practice monitor. Respondent need not identify any basis for this initial request.

10 (b) Subsequent Challenges: If, after selection of a second (or subsequent) practice
11 monitor, Respondent believes there is good cause why that individual should not serve
12 as practice monitor, Respondent may, within 15 days of notice of the selected practice
13 monitor, send a written request to the Probation Administrator asking that another
14 practice monitor be selected. That request must articulate good cause to support the
15 request. If the Probation Administrator agrees, another practice monitor will be
16 selected. If the Probation Administrator disagrees, the Office of Disciplinary Counsel
17 will submit its proposed selection for practice monitor to the Chair of the Disciplinary
18 Board for appointment pursuant to ELC 13.8(a)(2), and will also provide the Chair
19 with the Respondent's written request that another practice monitor be selected.

20 192. In the event the practice monitor is no longer able to perform the practice monitor's
21 duties, the Probation Administrator will select a new practice monitor at the Probation
22 Administrator's discretion.

23 193. During the period of probation, Respondent must cooperate with the named practice

1 monitor. Respondent must meet with the practice monitor at least once per month. Respondent
2 must communicate with the practice monitor to schedule all required meetings.

3 194. Respondent must bring to each meeting a current, complete written list of all pending
4 client legal matters being handled by the Respondent. The list must identify the current status of
5 each client matter and any problematic issues regarding each client matter. The list may identify
6 clients by using the client's initials rather than the client's name.

7 195. At each meeting, the practice monitor will discuss with Respondent practice issues
8 that have arisen or are anticipated. In light of the conduct giving rise to the imposition of
9 probation, ODC recommends that the practice monitor and Respondent discuss whether
10 Respondent is diligently making progress on each client matter, whether Respondent is in
11 communication with each client, whether Respondent has promptly billed each client, whether
12 Respondent's fee agreements are consistent with the RPC and are understandable to the client,
13 and whether Respondent needs to consider withdrawing from any client matters. Meetings may
14 be in person or by telephone at the practice monitor's discretion. The practice monitor uses
15 discretion in determining the length of each meeting.

16 196. The practice monitor will provide the Probation Administrator with quarterly written
17 reports regarding Respondent's compliance with probation terms and the RPC. Each report must
18 include the date of each meeting with Respondent, a brief synopsis of the discussion topics, and
19 a brief description of any concerns the practice monitor has regarding the Respondent's
20 compliance with the RPC. The report must be signed by the practice monitor. Each report is due
21 within 30 days of the completion of the quarter.

22 197. If the practice monitor believes that Respondent is not complying with any of
23 Respondent's 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.

198. 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:

(a) \$250 due within 30 days of the start of the probation;

(b) \$250 due within 6 months of the start of the probation period;

(c) \$250 due within 12 months of the start of the probation period; and

(d) \$250 due within 18 months of the start of the probation period.

199. All payments should be provided to the Probation Administrator for processing.

CLEs

200. During the probationary period, Respondent shall complete a minimum of 15 credit hours of continuing legal education courses, at Respondent's own expense, in the areas of: client communication, office organization, practice management, time management, caseload management, and removal defense.

201. Respondent shall provide evidence of attendance at such courses to the Probation Administrator no later than 30 days after the conclusion of the course. Proof of attendance shall include the program brochure, evidence of payment, and a written statement that includes the date and time of attendance.

Ethics School

202. Respondent shall attend Ethics School by webinar (approximately 7.5 hours), or by obtaining the recorded product, and to pay registration costs of \$150 plus applicable sales tax. Respondent will receive all applicable approved CLE credits for time in attendance at the Ethics School.

203. Attendance at Ethics School is in addition to and shall not fulfill any continuing legal

education (CLE) requirements set out in this stipulation.

204. Respondent shall contact the Ethics School Administrator, currently Claire Carden, at (206) 727-8220 or clairec@wsba.org, within 15 days of reinstatement to confirm enrollment in Ethics School and related logistics.

205. Respondent shall complete the ethics school requirement within 60 days of reinstatement.

206. Respondent shall provide evidence of completion of ethics school to the Probation Administrator no later than 30 days after the conclusion of the course. Proof of attendance shall include the program brochure, evidence of payment, and a written statement that includes the date and time of attendance.

207. Respondent may contact the Ethics School administrator directly to enroll in Ethics School and administrative communications, e.g. regarding registration, payment, program content and schedule, and CLE credits, may be sent directly to Respondent.

208. The Ethics School administrator may respond to inquiries from the Probation Administrator regarding Respondent's compliance with these conditions.

IX. RESTITUTION

209. Respondent shall pay restitution in the amount of \$4,500, plus interest at a rate of 12% per annum beginning on May 9, 2023, to Federico Alcantar Aguilar or the Lawyer's Fund for Client Protection. Respondent may enter into a payment plan, approved by ODC, to pay restitution.

210. Reinstatement from suspension is conditioned on full payment of restitution.

X. COSTS AND EXPENSES

211. In light of Respondent's willingness to resolve this matter by stipulation at an early

1 stage of the proceedings, Respondent shall pay attorney fees and administrative costs of \$1,000,
2 plus all actual costs in the amount of \$4,689.48, in accordance with ELC 13.9(i). The Association
3 will seek a money judgment under ELC 13.9(l) if these costs are not paid within 30 days of
4 approval of this stipulation. Reinstatement from suspension is conditioned on full payment of
5 costs.

6 **XI. VOLUNTARY AGREEMENT**

7 212. Respondent states that prior to entering into this Stipulation Respondent has
8 consulted independent legal counsel regarding this Stipulation, that Respondent is entering into
9 this Stipulation voluntarily, and that no promises or threats have been made by ODC, the
10 Association, nor by any representative thereof, to induce the Respondent to enter into this
11 Stipulation except as provided herein.

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

14 **XII. LIMITATIONS**

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

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

23 216. This Stipulation results from the consideration of various factors by both parties,

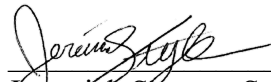
1 including the benefits to both by promptly resolving this matter without the time and expense of
2 hearings, Disciplinary Board appeals, and Supreme Court appeals or petitions for review. As
3 such, approval of this Stipulation will not constitute precedent in determining the appropriate
4 sanction to be imposed in other cases; but, if approved, this Stipulation will be admissible in
5 subsequent proceedings against Respondent to the same extent as any other approved Stipulation.

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

10 218. If this Stipulation is approved by the Disciplinary Board and Supreme Court, it
11 will be followed by the disciplinary action agreed to in this Stipulation. All notices required in
12 the Rules for Enforcement of Lawyer Conduct will be made. Respondent represents that, in
13 addition to Washington, Respondent also is admitted to practice law in the following jurisdictions,
14 whether current status is active, inactive, or suspended: Oregon and United States District Court
15 for the Western District of Washington.

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

1 WHEREFORE the undersigned being fully advised, adopt and agree to this Stipulation to
2 Three-Year Suspension as set forth above.

3 

4 Jeremiah Spencer Styles, Bar No. 49543
Respondent

Dated: 3/12/2025

5 

6 Pedro Melesio, Bar No. 51322
Counsel for Respondent

Dated: 03/12/25

7 

8 Henry Cruz, Bar No. 38799
Senior Disciplinary Counsel

Dated: 03/12/2025

ATTACHMENT A

ABA Standard 4.4 - Lack of Diligence

- 4.41 Disbarment is generally appropriate when:
- (a) a lawyer abandons the practice and causes serious or potentially serious injury to a client; or
 - (b) a lawyer knowingly fails to perform services for a client and causes serious or potentially serious injury to a client; or
 - (c) a lawyer engages in a pattern of neglect with respect to client matters and causes serious or potentially serious injury to a client.
- 4.42 Suspension is generally appropriate when:
- (a) a lawyer knowingly fails to perform services for a client and causes injury or potential injury to a client, or
 - (b) a lawyer engages in a pattern of neglect and causes injury or potential injury to a client.
- 4.43 Reprimand is generally appropriate when a lawyer is negligent and does not act with reasonable diligence in representing a client, and causes injury or potential injury to a client.
- 4.44 Admonition is generally appropriate when a lawyer is negligent and does not act with reasonable diligence in representing a client, and causes little or no actual or potential injury to a client.

ABA Standard 6.1 - False Statements, Fraud, and Misrepresentation

- 6.11 Disbarment is generally appropriate when a lawyer, with the intent to deceive the court, makes a false statement, submits a false document, or improperly withholds material information, and causes serious or potentially serious injury to a party, or causes a significant or potentially significant adverse effect on the legal proceeding.
- 6.12 Suspension is generally appropriate when a lawyer knows that false statements or documents are being submitted to the court or that material information is improperly being withheld, and takes no remedial action, and causes injury or potential injury to a party to the legal proceeding, or causes an adverse or potentially adverse effect on the legal proceeding.
- 6.13 Reprimand is generally appropriate when a lawyer is negligent either in determining whether statements or documents are false or in taking remedial action when material information is being withheld, and causes injury or potential injury to a party to the legal proceeding, or causes an adverse or potentially adverse effect on the legal proceeding.
- 6.14 Admonition is generally appropriate when a lawyer engages in an isolated instance of neglect in determining whether submitted statements or documents are false or in failing to disclose material information upon learning of its falsity, and causes little or no actual or potential injury to a party, or causes little or no adverse or potentially adverse effect on the legal proceeding.

ABA Standard 7.0 - Violations of Duties Owed as a Professional

- 7.1 Disbarment is generally appropriate when a lawyer knowingly engages in conduct that is a violation of a duty owed as a professional with the intent to obtain a benefit for the lawyer or another, and causes serious or potentially serious injury to a client, the public, or the legal system.
- 7.2 Suspension is generally appropriate when a lawyer knowingly engages in 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.
- 7.3 Reprimand is generally appropriate when a lawyer negligently engages in 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.
- 7.4 Admonition is generally appropriate when a lawyer engages in an isolated 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 system.