

**PRACTICE OF LAW BOARD
STATE OF WASHINGTON**

1325 Fourth Avenue, Suite 600, Seattle, WA 98101-2539
(206) 727-8252 ■ Fax (206) 727-8314

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February 10, 2009

Kelly M. Stanton
Stanton & Associates

██████████, ██████████
Seattle, WA ██████████

RE: File No. 06-02 Unauthorized Practice of Law Complaint
against Kelly M. Stanton

Dear Stanton:

The Practice of Law Board (hereinafter, "the Board") was created by order of the Washington State Supreme Court, General Rule (GR) 25. The Board is charged with the investigation of allegations of unauthorized practice of law in Washington. Revised Code of Washington (RCW) 2.48.180 states that a nonlawyer practicing law or holding himself out as entitled to practice law constitutes the unauthorized practice of law. Court rule GR 24 defines the practice of law. The unauthorized practice of law is a crime in Washington.

As you are aware, A ██████████ W ██████████ has filed a complaint against you alleging that you engaged in the unauthorized practice of law by misrepresenting yourself as an attorney during numerous business interactions. According to Mr. W ██████████'s complaint, he met you through a mutual friend. You claimed to be an attorney from California who has worked with many celebrities. Mr. W ██████████ included with his complaint copies of your letterhead, business cards and facsimile cover sheet that give the false impression that you are an attorney. For example, you listed your website on the facsimile cover sheet as www.stantonlaw.com. Mr. W ██████████ further stated that your Seattle office contained an empty Notre Dame School of Law Diploma holder, which you explained the copies of the diploma were on backorder, as well as a set of Washington Practice books. During a Seattle Police investigation in which Police conducted a search of your Seattle office, these items were recovered. According to Mr. W ██████████, you formed a Nevada corporation for him, Ramm Tire, in April

2005 and advised him on tax strategies regarding the donation of a painting.

According to a Seattle Police investigation, you also met with Mr. W█████'s friend, D█████ P█████. You convinced Mr. P█████ that you were a lawyer, gained Mr. P█████'s trust, and formed the Ardent Group LLC with him. You ultimately embezzled \$25,000 from Mr. P█████. The Seattle Police investigation also shows that you continue to hold yourself out as a licensed attorney in business interactions. For example, you use the email address stantonlaw@gmail.com in business interactions.

The Board's Investigative Attorney also interviewed R█████ T█████, a real estate developer who was introduced to you by Mr. P█████. According to Mr. T█████, you described yourself to him as a tax attorney, and stated that you had been admitted to the Bar in California, Nevada, and Washington. You told Mr. T█████ that you would subscribe four million dollars in his company on behalf of a client. You claimed the funds had been held up due to complications and showed Mr. T█████ several letters to substantiate the existence of these funds. These included letters that were written to "Mr. Kelly M. Stanton, Solicitor and Counselor at Law" and "Kelly M. Stanton, Legal Counsel." According to Mr. T█████, you persuaded him to offer you a bridge loan until funds cleared and he loaned you \$250,000. You also formed several corporations for Mr. T█████, for which he paid you \$2,500.

You are not a lawyer. RCW 2.48.180(2)(a) states that a non-lawyer practicing law or holding himself out as entitled to do so constitutes the unauthorized practice of law. Court Rule GR 24 defines of the practice of law to include, but is not limited to, the following:

1. Giving advice or counsel to others as to their legal rights or the legal rights or responsibilities of others for fees or other consideration.
2. Selection, drafting or completion of legal documents or agreements which affect the legal rights of an entity or person(s).
3. Representation of another entity or person(s) in a court, or in a formal administrative adjudicative proceeding or other formal dispute resolution process or in an administrative adjudicative proceeding in which legal pleadings are filed or a record is established as the basis for judicial review.
4. Negotiation of legal rights or responsibilities on behalf of another entity or person(s).

By misrepresenting to Mr. W█████, Mr. P█████, Mr. T█████, and others that you graduated from law school, that you are a lawyer, and that you were admitted to practice by either the state bars of California, Nevada, or Washington, you are holding yourself out as a lawyer and therefore engaging in the unauthorized practice of law. By drafting formation documents for

corporations and limited liability companies, and by advising Mr. W [REDACTED] on tax strategies, you are engaging in the unauthorized practice of law.

At this time, pursuant to GR 25(f)(4)(B), we request that you enter into a written agreement with this Board, to refrain from the following conduct:

- Holding yourself out as entitled to practice law;
- Advising or counseling others as to their legal rights or the legal rights or responsibilities of others;
- Selecting, drafting or completing legal documents or pleadings for others;
- Any activity which is defined as the practice of law in GR 24.

The Practice of Law Board has also ordered to refer the investigation of this matter to the County Prosecutor's Office. If you disagree with the Board's final action, you may seek review by filing a Notice of Petition for Review with the Washington Supreme Court. The Notice must be filed within 30 days of final Board action. You must serve the original Notice of Petition for Review on the Supreme Court Clerk and a copy on the Board. Your Notice must set out you name and address, the name and address of your counsel, if any, and a concise statement of the reason for your appeal. Your Petition must comply with the Rules of Appellate Procedure (RAP). For further information on Petitions for Review, please see GR 25(g).

Please sign and date your signature and have your signature witnessed by a person over the age of eighteen, who will also sign as the witness. The signed letter should be returned to the Board within 15 days.

Thank you in advance for your anticipated cooperation.

Very Truly Yours,



Steve Crossland, Chair
Practice of Law Board

JS:as

Enclosure: Agreement to Refrain

cc: A [REDACTED] W [REDACTED] (w/out enclosure)