

FILED

Aug 18, 2026

Disciplinary
Board

Docket # 014

DISCIPLINARY BOARD
WASHINGTON STATE BAR ASSOCIATION

In re

Alexandra Lozano,

Lawyer (resigned in lieu of discipline)

WSBA #40478

Proceeding No. 26#00039

AMENDED ORDER APPOINTING
CUSTODIANS TO PROTECT
CLIENTS' INTERESTS

After reviewing the Stipulated Motion to Amend Order Appointing Custodians' to Protect Clients' Interests, the Chair of the Disciplinary Board amends the August 3, 2026, Order Appointing Custodians' to Protect Clients' Interests. It is **HEREBY ORDERED:**

On July 22, 2026, the Washington State Bar Association ("WSBA") General Counsel filed a Motion seeking the appointment of custodians to protect the interests of the former clients of Alexandra Lozano (WSBA #40478). Following the Disciplinary Board Chair's order dated July 27, 2026, Ms. Lozano filed a timely Response, and the General Counsel filed a timely Reply.

After consideration of the Motion, Response, Reply, and supporting materials, the Chair finds that Ms. Lozano resigned from WSBA in lieu of discipline, did not fulfill her Title 14 responsibilities and has failed to protect client interests, and that it appears no personal representative, partner, or other responsible person is properly protecting the clients' interests. Particularly persuasive is the General Counsel's evidence of confusion or

1 concern by hundreds of Ms. Lozano's former clients, as well descriptions in Ms. Lozano's
2 own submissions of the challenges of winding down her practice and addressing her former
3 clients' needs. This justifies the appointment under ELC Rule 7.7(a) of custodians to act as
4 counsel for the purposes of protecting clients' interests.

5 The General Counsel submitted a proposed order governing the appointment of
6 custodians. Ms. Lozano's Response raised several concerns regarding elements of the
7 proposed order and submitted a proposed order of her own. The General Counsel submitted
8 a revised proposed order addressing the issues raised in the Response, incorporating most,
9 but not all, of the changes proposed by Ms. Lozano.

10 The Chair declines to include Ms. Lozano's suggested language requiring
11 coordination with her and her former law firm. The paramount consideration is protection
12 of the clients' interests. While some coordination will likely be necessary for custodians to
13 carry out their responsibilities and Ms. Lozano to satisfy her ongoing obligations to former
14 clients, mandatory coordination as Ms. Lozano proposes could slow or otherwise hinder the
15 custodians' efforts to protect clients' interests. Though the attorney work product doctrine
16 may be asserted by either a client or a lawyer, their respective interests in restricting
17 opposing parties' access to work product would ordinarily align. Ms. Lozano's former
18 clients and any new counsel they obtain could be expected to protect those interests. Ms.
19 Lozano has not demonstrated a legitimate need for her interests in attorney work product to
20 be protected separately from the interests of her former clients.

21 NOW, THEREFORE, pursuant to ELC 7.7(a), IT IS HEREBY ORDERED:

22 **CUSTODIAN:** Lawyers Adam Boyd (WSBA #49849) and Russell Aoki (WSBA
23 #15717) are appointed Custodians of the client files and records and trust account(s) for
24 former lawyer Alexandra Lozano. Upon motion, additional custodians may be appointed to
25 this matter.

26 **DUTIES:** The Custodians are granted the authority to take necessary action to
27 obtain nonexclusive access to, or possession of copies, exports, images, or other

1 reproductions of possession of client-specific records, documents, and other case-related
2 client information in physical or electronic format created and maintained by Ms. Lozano
3 and/or her former firm(s) in furtherance of the representation of identifiable clients, and to
4 act as needed to protect client interests or as directed by the Chair's order or the ELCs.
5 However, the Custodians shall have exclusive control of the Those actions include assuming
6 control trust accounts. The Custodians shall be granted access to client-related financial
7 and billing records reasonably necessary to determine ownership of trust account funds to
8 protect clients' interests. Further, the custodians shall be granted access to client billing
9 records so that clients' interests can be protected should they want to apply to the Client
10 Protection Fund, where they must demonstrate whether work of value was performed.
11 Barring any unforeseen technological or licensing issues, access to the allowable materials
12 described herein must be provided to the Custodians no later than ten (10) days from the
13 date of this order.

14 Any bank or other person honoring the authority of the Custodians is exonerated
15 from any resulting liability. ELC 7.7(b).

16 The Custodians may also take possession of all mail routed to Alexandra Lozano
17 Immigration Law or La Luz Del Camino Legal. The Custodians' access to or possession of
18 mail shall be nonexclusive and shall not require the transfer, destruction, disabling, or
19 alteration of any master mailbox, mail archive, or mail system maintained by Ms. Lozano
20 or her former firm(s), absent further order of the Chair. By facilitating compliance with this
21 Order, neither Ms. Lozano nor her former firm shall be deemed to waive any arguments or
22 objections they may have in connection with their independent interest in any attorney work
23 product that may be present in the client materials obtained by the Custodians.

24 Absent further order of the Chair, the Custodians are not authorized to obtain
25 possession of records, documents, information, and/or communications that are not related
26 to representation of clients of Ms. Lozano or that relate to internal operations of her former
27 firm, administrative matters, human resource matters, non-client related communications

1 between Ms. Lozano or her former firm and their outside counsel, or accounts other than
2 the firm's trust account. In addition, the custodians are not authorized to obtain or review
3 attorney-client privileged communications between Ms. Lozano or her former firm and their
4 outside counsel, including communications that relate to Ms. Lozano's or her former firm's
5 clients.

6 In the event that materials that (1) are not related to representation of clients of Ms.
7 Lozano; (2) relate to internal operations of her former firm, administrative matters, human
8 resource matters, or accounts other than the firm's trust account; and/or (3) constitute
9 attorney-client privileged communications between Ms. Lozano or her former firm and their
10 outside counsel, including communications that relate to Ms. Lozano's or her former firm's
11 clients (collectively, "Non-Client Information") are disclosed, made available to, or
12 provided to the Custodians, that disclosure shall not constitute a waiver of any attorney-
13 client, work-product, or other privilege or protection, regardless of whether the producing
14 party took reasonable steps to prevent disclosure, and regardless of whether the disclosure
15 was inadvertent or otherwise. Upon receipt of written notice from Ms. Lozano or her former
16 firm identifying any Non-Client Information that was inadvertently or improperly produced,
17 the Custodians shall, within five business days of such notice:

18 •immediately cease any review, use, or dissemination of the identified Non-Client
19 Information;

20 •promptly return, sequester, or destroy all copies of the identified Non-Client
21 Information, including any copies, summaries, abstracts, notes, or other work product
22 derived therefrom, in whatever form or medium; and

23 •certify in writing that all such materials have been returned, sequestered, or
24 destroyed and that no copies have been retained.

25 This provision is intended to be enforceable under Federal Rule of Evidence 502(d)
26 and any analogous rule or statute.

1 The Custodians shall undertake reasonable steps to not disclose Non-Client
2 Information and will notify representatives of Ms. Lozano or her former firm within five
3 business days of realizing that they have received or been granted access to Non-Client
4 Information. If the Custodians disclosed or used any Non-Client Information prior to
5 receiving notice of a disclosure or noticing that they had received Non-Client Information,
6 the Custodians shall take all reasonable steps to retrieve such material and to prevent further
7 disclosure.

8 **IMMUNITY:** The Custodians and other lawyers and staff working under the direct
9 supervision of the custodian shall enjoy quasi-judicial immunity as set forth in General Rule
10 12.5.

11 **PUBLIC INFORMATION:** The fact that Custodians have been appointed, the
12 Custodians' names and contact information, and this order are public information. Client
13 files and records held by the Custodians are confidential unless release is authorized by the
14 client. ELC 3.3(c).

15 **DESTRUCTION AND RETENTION:** Ms. Lozano represents that she and her
16 former law firm are currently named defendants in two lawsuits in federal court in the
17 Western District of Washington brought by former clients in connection with which Ms.
18 Lozano and her former firm have document preservation obligations which require that they
19 retain copies of the client files and related materials here at issue. Accordingly, the
20 Custodians shall not destroy any files or records. Notwithstanding any other provision of
21 this Order, Ms. Lozano and her former firm shall be entitled to maintain the master version
22 of, and a complete copy of, all firm data, including all client files, records, documents,
23 communications, and other case-related information in physical or electronic format,
24 whether or not the Custodians obtain possession of such materials. Wherever reasonably
25 practicable, the Custodians shall obtain copies, rather than original or sole versions, of
26 client-specific records, documents, and other case-related client information. If the
27 Custodians take possession of any original or sole version of any record or data, Ms. Lozano

1 and her former firm shall be permitted, at their own expense, to make and retain a complete
2 copy of such record or data before or promptly following the transfer of possession. Nothing
3 in this Order shall be construed to require Ms. Lozano or her former firm to relinquish,
4 delete, destroy, or transfer their master versions or copies of firm data, and the retention of
5 such materials by Ms. Lozano or her former firm shall not constitute a violation of this
6 Order. All materials retained by Ms. Lozano or her former firm pursuant to this paragraph
7 shall remain subject to applicable confidentiality obligations, document preservation
8 obligations, and the Rules of Professional Conduct. Upon completion of the custodianship
9 and resolution of any litigation requiring preservation, Ms. Lozano remains responsible for
10 appropriately destroying or otherwise disposing of client records in accordance with
11 applicable law and ethical obligations.

12 This Order may be filed in any court or administrative agency proceeding, or
13 presented to any person, financial institution, or other entity.

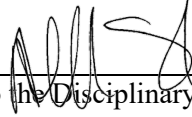
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15 DATED this 18th day of August, 2026.

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18 Keith Cohon
19 Disciplinary Board Chairperson
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CERTIFICATE OF SERVICE

I certify that I caused a copy of the Amended Order Appointing Custodians to Protect Clients' Interests to be emailed to the Office of General Counsel and to the Respondent's Counsel, Kevin M Bank, at kevin@kevinbanklaw.com, Respondent's Counsel, Angelo Calfo, at angelo@angelicalfo.com, Respondent's Counsel Harold Malkin, at harold@angelicalfo.com, Respondent's counsel Tyler Weaver, at tylerw@angelicalfo.com, on the 18th day of August, 2026.



Clerk to the Disciplinary Board