

_____, 2024

Hon. Dennis Saab
The State Bar Court of California
845 South Figueroa Street
Los Angeles, CA 90017-2515

Re: Case No. 20-O-05338 Against Bruce R. Greene

Judge Saab:

On March 25, 2020, the Tulare Local Healthcare District (“District”) filed with the State Bar of California its complaint against Bruce Greene of Baker & Hostetler, LLP (Case No. 20-O-05338). On October 25, 2021, the State Bar concluded its almost eighteen-month investigation and the matter was forwarded to State Bar’s Deputy Trial Counsel for “further action.” On September 29, 2023, Deputy Trial Counsel finally filed its Notice of Disciplinary Charges before the State Bar Court of California.

Despite initially having set this matter for trial during February and March of 2024—hinting at a degree of closure for a community long impacted by Mr. Greene’s unethical acts as the District’s General Counsel—the Bar Court instead considered and approved on January 4, 2024 a Motion for Abatement previously filed on Mr. Greene’s behalf.

The Tulare community has waited now over 6 years (4 years since the District filed the present case) for final recognition from the authority charged with oversight of Mr. Greene’s significant deviation from the ethical standards befitting the practice of law. Without this strong oversight, there can be no public trust in the California system of justice.

We wish to protest in the strongest terms the unnecessary and inappropriate further delay caused by the Bar Court’s granting of Mr. Greene’s motion.

Mr. Greene was involved in a material conflict of interest arising from his representation of a contractor hired by the District to run its community hospital, a representation that predated his time as the District’s counsel. By knowingly and deliberately leveraging this conflicted position against the District, Mr. Greene profited personally and on behalf of his firm from the millions of dollars paid by the District for what it believed to be faithful legal representation. This malfeasance materially contributed to the closure of Tulare’s only community hospital, and to the bankruptcy of the District. Notwithstanding having made some progress, Mr. Greene’s prior actions reverberate through the community even today as the hospital attempts to rebuild to previous levels of medical service and community trust.

The Bar Court’s granting of Mr. Greene’s motion delays indefinitely State Bar action on the District’s now much aged complaint. If the purpose of the Bar Complaint review program is at

least partially to recognize wrongdoers and prevent further wrongdoing to others, this process has failed horribly the citizens of greater Tulare and the State of California.

The Bar Court's recent decision appears to have fully considered the rights of the accused while ignoring damages to the victims, victims' rights, and the application of fair and equitable justice for all. There has been no impact as a result of the District's complaint on Mr. Greene for over six years. To say this is a miscarriage of justice would be exceptionally lenient. If the process in this regard is the status quo, the state should eliminate the State Bar complaint process in its present form devise a more effective approach. Clearly, at least with respect to the District's complaint, the State Bar complaint process has served no one but Mr. Greene.

The evidence offered and supplemented by the District in support of its claims against Mr. Greene are enough to move this process forward without delay, and the District asks this Bar Court to reconsider its recent abatement in order to fulfill its mandate to protect the public trust.

Thank you for your attention to this important matter.

Kevin Northcraft, President

Mike Jamaica, Vice President

Xavier J. Avila, Secretary

Jevon Price, Treasurer

Kathy Nesper, Director

cc: Office of State Bar Chief Trial Counsel
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California State Auditor
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Tulare County Board of Supervisors
Tulare City Council
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