

Aug 3, 2026

Disciplinary
Board

Docket # 010

DISCIPLINARY BOARD
WASHINGTON STATE BAR ASSOCIATION

In re

Alexandra Lozano,

Lawyer (resigned in lieu of discipline)

WSBA #40478

Proceeding No. 26#00039

ORDER APPOINTING CUSTODIANS
TO PROTECT CLIENTS' INTERESTS

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 concern by hundreds of Ms. Lozano's former clients, as well descriptions in Ms. Lozano's own submissions of the challenges of winding down her practice and addressing her former

1 clients' needs. This justifies the appointment under ELC Rule 7.7(a) of custodians to act as
2 counsel for the purposes of protecting clients' interests.

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

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

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

20 CUSTODIAN: Lawyers Adam Boyd (WSBA #49849) and Russell Aoki (WSBA
21 #15717) are appointed Custodians of the client files and records and trust account(s) for
22 former lawyer Alexandra Lozano. Upon motion, additional custodians may be appointed to
23 this matter.

24 DUTIES: The Custodians are granted the authority to take necessary action to obtain
25 possession of client-specific records, documents, and other case-related client information
26 in physical or electronic format created and maintained by Ms. Lozano and/or her former
27 firm(s) in furtherance of the representation of identifiable clients, and to act as needed to

1 protect client interests or as directed by the Chair's order or the ELCs. Those actions include
2 assuming control of trust accounts.¹ The Custodians shall be granted access to client-related
3 financial and billing records reasonably necessary to determine ownership of trust account
4 funds to protect clients' interests. Further, the custodians shall be granted access to client
5 billing records so that clients' interests can be protected should they want to apply to the
6 Client Protection Fund, where they must demonstrate whether work of value was performed.

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

9 The Custodians may also take possession of all mail routed to Alexandra Lozano
10 Immigration Law or La Luz Del Camino Legal. By facilitating compliance with this Order,
11 neither Ms. Lozano nor her former firm shall be deemed to waive any arguments or
12 objections they may have in connection with their independent interest in any attorney work
13 product that may be present in the client materials obtained by the Custodians.

14 Absent further order of the Chair, the Custodians are not authorized to obtain
15 possession of records, documents, information, and/or communications that are not related
16 to representation of clients of Ms. Lozano or that relate to internal operations of her former
17 firm, administrative matters, human resource matters, non-client related communications
18 between Ms. Lozano or her former firm and their outside counsel, or accounts other than
19 the firm's trust account.

20 IMMUNITY: The Custodians and other lawyers and staff working under the direct
21 supervision of the custodian shall enjoy quasi-judicial immunity as set forth in General Rule
22 12.5.

23 PUBLIC INFORMATION: The fact that Custodians have been appointed, the
24 Custodians' names and contact information, and this order are public information. Client
25

26 ¹ The Chair notes that ELC Rule 7.7(b) authorizes a custodian to assume control of not only trust accounts,
27 but also "other financial affairs." This order adopts the scope of financial authority proposed by the General
Counsel; control over "other financial affairs" may be sought by motion if necessary to carry out the
purposes of ELC Rule 7.7.

1 files and records held by the Custodians are confidential unless release is authorized by the
2 client. ELC 3.3(c).

3 DESTRUCTION: Ms. Lozano represents that she and her former law firm are
4 currently named defendants in two lawsuits in federal court in the Western District of
5 Washington brought by former clients in connection with which Ms. Lozano and her former
6 firm have document preservation obligations which require that they retain copies of the
7 client files and related materials here at issue. Accordingly, the Custodians shall not destroy
8 any files or records. Upon completion of the custodianship and resolution of any litigation
9 requiring preservation, Ms. Lozano remains responsible for appropriately destroying or
10 otherwise disposing of client records in accordance with applicable law and ethical
11 obligations.

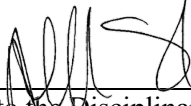
12 This Order may be filed in any court or administrative agency proceeding, or
13 presented to any person, financial institution, or other entity.

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15 DATED this 3rd day of August, 2026.

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18 Keith E. Cohon
19 Disciplinary Board Chair
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CERTIFICATE OF SERVICE

I certify that I caused a copy of the 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 3rd day of August, 2026.



Clerk to the Disciplinary Board