United States District Court
Northern District of California

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

USA,
Plaintiff,
v.
STEVENSON,
Defendant.

Case No. 21-cr-00018-CRB-1

ORDER RE DISCIPLINARY REFERRAL

Defendant was convicted of wire fraud. But his counsel, Jeremy Ross and Ryan D'Ambrosio, are the subject of this order. In the Court's view, it has never seen a more egregious example of ineffective assistance of counsel. Here are some examples of Ross and D'Ambrosio's poor and unprofessional conduct:

- Improper statements before the jury, such as asking about the Government's readiness to cross-examine Defendant when counsel had represented that Defendant would not testify;
- Tardiness;
- Improper outbursts, such as crying during offers of proof and improperly delaying the questioning of witnesses;
- Failure to prepare witnesses—including Defendant—for direct or cross-examination;
- Failure to proffer relevant exhibits during the defense case-in-chief and waiting until after the Government's closing argument to disclose potentially relevant evidence, which ignored disclosure obligations and authenticity requirements;

- Failure to proffer a finished Rule 16 report of their expert to the Government until after the prosecution's case-in-chief, with the report also including improper opinions;
- Failure to make a Rule 29 motion;
- Failure to provide an instruction on the defense theory of the case;
- Failure to know and follow the Federal Rules of Evidence;
- Failure to provide Defendant with the Government's offer of a plea agreement; and
- Delay and mismanagement of production of materials to post-trial counsel.

See, e.g., July 8, 2026 Tr. (dkt. 273) 6:24–9:22.

Ross and D'Ambrosio's conduct suggests that they are likely unable to represent their clients in accordance with California Rule of Professional Conduct 1.1, which provides that a "lawyer shall not intentionally, recklessly, with gross negligence, or repeatedly fail to perform legal services with competence." Cal. R. Pro. Conduct Rule 1.1(a). "Competence" includes the ability to apply the "mental, emotional, and physical ability reasonably necessary for the performance of [legal] services." Cal. R. Pro. Conduct Rule 1.1(b).

Considering the foregoing, the Court refers Ross and D'Ambrosio to the Northern District's Standing Committee on Professional Conduct for investigation and appropriate sanctions pursuant to Criminal Local Rule 2-1 and Civil Local Rule 11-6(e). The Court also refers Ross and D'Ambrosio to the State Bar of California for appropriate discipline. Accordingly, Ross and D'Ambrosio must self-report to the State Bar regarding the issues outlined in this Order by no later than September 15, 2026. Ross and D'Ambrosio shall certify to this Court by no later than September 21, 2026, that they have complied with this Order.

IT IS SO ORDERED.

Dated: September 8, 2026



CHARLES R. BREYER
United States District Judge