

CALIFORNIA COURT OF APPEAL, FOURTH APPELLATE DISTRICT,
DIVISION ONE

People v. Alvarez

No. D084581 (Cal. Ct. App. Oct. 2, 2025) · No. D084581 · Decided October 3, 2025

SUMMARY

The California Court of Appeal addresses an attorney’s failure to verify artificial-intelligence-generated legal citations and quotations in a criminal appeal. The court finds violations of professional and court rules, publishes the order, imposes a \$1,500 sanction payable by the attorney, and directs notice to the State Bar. New counsel was appointed after the attorney withdrew from representing the defendant.

CASE DETAILS

COURT	California Court of Appeal, Fourth Appellate District, Division One
WRITING FOR THE COURT	McConnell, P.J.
JURISDICTION	California Court of Appeal, Fourth Appellate District, Division One
DECIDED	October 3, 2025
DOCKET	D084581
DISPOSITION	other
PROCEDURAL POSTURE	The Court of Appeal issued an order to show cause why attorney sanctions should not be imposed for false, nonexistent, and materially misrepresented legal citations in a criminal appellate filing. After a hearing, the court found professional and appellate-rule violations, imposed a \$1,500 sanction on Attorney George Siddell, directed notification to the State Bar, accepted his withdrawal, and appointed new counsel for the defendant.
PRECEDENTIAL VALUE	Published and certified for publication; precedential under California law.
PARTIES	Raziel Ruiz Alvarez v. The People

TOPICS

- criminal procedure
- appellate procedure
- due process
- right to counsel
- constitutional law

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether counsel violated California's professional-conduct rules and Rules of Court by filing a fabricated quotation, citing a nonexistent case, and misrepresenting the holdings or substance of other authorities.
2. Whether the court should impose a monetary sanction and take other corrective action for those violations.
3. Whether counsel's use of artificial intelligence relieved him of his professional duty to verify legal authorities.

HOLDINGS

1. An attorney may appropriately use artificial intelligence in law practice, but must personally verify every legal citation, ensure that cited cases exist, confirm that citations are accurate, and ensure that authorities support the propositions for which they are cited. This responsibility cannot be delegated to technology.
2. Siddell violated his professional duty by submitting a hallucinated citation and misrepresenting the law stated in other opinions; he also violated California Rules of Court rules 8.1115(a) and 8.276(a)(4).
3. Because counsel violated a Rule of Professional Conduct, the court was required to take appropriate corrective action and properly imposed a \$1,500 sanction payable personally by Siddell to the Fourth District Court of Appeal, Division One, and directed notice to the State Bar.

KEY QUOTATIONS

“there is nothing inherently wrong with an attorney appropriately using AI in a law practice” (at 2)

“Honesty in dealing with the courts is of paramount importance, and misleading a judge is, regardless of motives, a serious offense.” (at 2)

“Thus, criminal defense attorneys must make every effort to confirm that the legal citations they supply exist and accurately reflect the law for which they are cited.” (at 3)

FACTUAL BACKGROUND

Attorney George Siddell filed a criminal appellate opposition containing a quotation attributed to *In re Benoit* that did not appear in that case, cited a nonexistent case, and relied on two other cases that did not address the propositions for which they were cited. Siddell admitted that he failed to verify citations supplied through artificial intelligence and acknowledged that verification was his responsibility. His conduct required withdrawal and appointment of new counsel and consumed judicial time and resources.

PROCEDURAL HISTORY

Siddell filed an opposition to a motion to dismiss in a related criminal appeal containing a fabricated quotation, a nonexistent case citation, and citations to cases that did not support the propositions for which they were cited.

The court issued an order to show cause, held a hearing on September 15, 2025, accepted Siddell's withdrawal after he informed his client, and directed appointment of new counsel to restart briefing. The court then published the order, imposed a \$1,500 monetary sanction payable to the Fourth District Court of Appeal, Division One, and ordered notice to the State Bar.

DISPOSITION

other

CASES CITED

- In re Benoit, 10 Cal.3d 72, 87-88 (1973)
- People v. Robinson, 172 Cal.App.4th 452 (2009)
- People v. Jones, 25 Cal.4th 98 (2001)
- People v. Williams, 77 Cal.App.4th 436 (1999)
- Noland v. Land of the Free, L.P., No. B331918, 2025 WL 2629868
- Paine v. State Bar of California, 14 Cal.2d 150, 154 (1939)
- Evitts v. Lucey, 469 U.S. 387, 395 (1985)
- People v. Kelly, 40 Cal.4th 106, 117 (2006)
- Rochin v. California, 342 U.S. 165, 169 (1952)
- People v. Freeman, 220 Cal.App.4th 607, 609 (2013)