

FILED

OCT 14 2011

STATE BAR COURT CLERK'S OFFICE
SAN FRANCISCO

1 Wendell d. Peters
2 (530) 888-8600
3 Respondent
4

5 STATE BAR COURT
6
7 HEARING DEPARTMENT – SAN FRANCISCO
8

9 In the Matter of:

Case No(s): 11-0-10839; ET. AL.

10 WENDELL PETERS,
11 No. 150132

RESPONSE:
NOTICE OF DISCIPLINARY
CHARGES

12
13 A Member of the State
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17 **NOW COMES RESPONDENT, WENDELL D. PETERS**, in answering the
18 complaint of Petitioner on file herein as follows:

- 19 1. Respondent denies Count One
20 2. Respondent denies Count Two.
21 3. Respondent denies Count Three.
22 4. Respondent denies Count Four.
23 5. Respondent denies Count Five.
24 6. Respondent denies Count Six.
25 7. Respondent denies Count Seven.
26 8. Respondent denies Count Eight.
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1 9. Respondent denies Count Nine.

2 10. Respondent denies Count Ten.

3 11. Respondent denies Count Eleven.

4 12. Respondent admits in part as to Count Twelve. That being only that pertaining to
5 appearances being made while suspended. Actions in part were directly caused by the unclean
6 hands of the California State Bar. The ongoing actions of the California State Bar and its Agent
7 brought about not only economic ruin to the respondent, but also resulted in the physical and
8 emotional breakdown of the respondent.
9

10 13. Respondent admits in part as to Count Thirteen. That being only that pertaining to
11 appearances being made while suspended. Actions in part were directly caused by the unclean
12 hands of the California State Bar. The ongoing actions of the California State Bar and its Agent
13 brought about not only economic ruin to the respondent, but also resulted in the physical and
14 emotional breakdown of the respondent.
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16 14. Respondent admits in part as to Count Fourteen. That being only that pertaining to
17 appearances being made while suspended. Actions in part were directly caused by the unclean
18 hands of the California State Bar. The ongoing actions of the California State Bar and its Agent
19 brought about not only economic ruin to the respondent, but also resulted in the physical and
20 emotional breakdown of the respondent.
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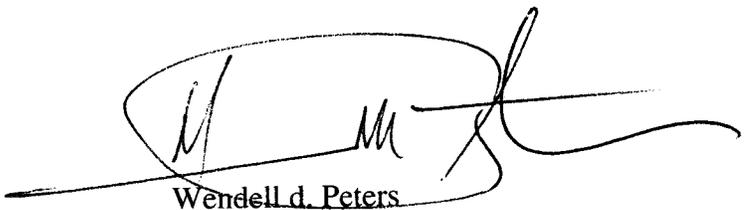
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23 **AFFIRMATIVE DEFENSES**

24 1. Respondent asserts the affirmative defense of Unclean Hands and others to be
25 specified later by amendment.

26 2. Respondent asserts that the actions of the California State Bar are outside
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the protections of immunity. As such the actions of the California State Bar, now over a nine year period are the cause for the condition and circumstances contained within the charging document. These actions and their results will be clearly set forth at a later date.



Wendell d. Peters

Dated: 10-13-11

PROOF OF SERVICE BY PERSONAL DELIVERY¹

In the Matter of Wendell D. Peters 150132

State Bar Court Case No. 11-D-10839 ET AL.

I, the undersigned, hereby declare as follows:

1. I am over the age of 18 years;

2. My business/residence address is: 929 12th Street
Marysville, Ca 95901;

3. On Oct. 14, 2011, I personally served a true copy of the attached
response notice of disciplinary charges

(state exact name of served document(s)) in the above-captioned action upon _____
Robin Brune by (check applicable option):

- (1) personally delivering a copy of said document(s) to the above-named person;
- (2) personally leaving said document(s) in a envelope or package clearly labeled to identify the attorney being served with a receptionist or other person having charge of the office of the above-named attorney (use only in the case of service upon an attorney)

4. The location/address at which the aforesaid service occurred was: 180
Howard St. San Francisco, Ca. 94105;

5. This declaration was executed on _____, 2____ at _____, California;

6. The foregoing is true and correct and I so state under penalty of the laws pertaining to perjury in the State of California.

Traci J. Peters
Print name: Traci J. Peters

¹Use only for personal service or for service on an attorney pursuant to Code of Civil Procedure section 1011 (a).