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9 and Rita Mahdessian
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FILED

NOV 01 2016

**STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES**

11 **THE STATE BAR COURT**
12 **HEARING DEPARTMENT - LOS ANGELES**

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14 In the Matters of:

15
16 VARTKES YEGHIAYAN and
17 RITA MAHDESSIAN

18 Members of the State Bar of California

19 (Member Nos. 41773 and 141901)
20

) Case Nos: 11-O-11758 and 11-O-11759

) RITA MAHDESSIAN'S RESPONSE
) TO THE STATE BAR'S NOTICE OF
) DISCIPLINARY CHARGES

) Assigned to Judge Donald F. Miles



27 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:
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RITA MAHDESSIAN'S RESPONSE TO THE STATE BAR'S NOTICE OF DISCIPLINARY CHARGES

1 Please take notice that Respondent Rita Mahdessian (hereinafter referred to as
2 "Respondent") hereby submits the following Response to the State Bar's Disciplinary
3 Charges:
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5 **INTRODUCTION**
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7 Respondent has not yet fully completed the investigation of facts relating to
8 these cases and has not yet fully completed discovery in this action and has not
9 completed preparation for trial. This Response to the State Bar's Disciplinary Charges
10 is based solely upon information and documents which are presently available to, and
11 specifically known by Respondent. It is anticipated that further discovery, independent
12 investigation, legal research and analysis will supply additional facts, add meaning to
13 the known facts, as well as establish entirely new factual conclusions and legal
14 contentions, all of which may lead to substantial additions to, changes in and
15 variations from this Response to the State Bar's Disciplinary Charges as herein set
16 forth.
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18 The following Response to the State Bar's Disciplinary Charges is provided
19 without prejudice to the Respondent's right to produce evidence of any subsequently
20 discovered facts, documents or witnesses. If the Respondent obtains additional
21 information or documents, learns the identity of additional witnesses, or determines
22 that it intends to call additional witnesses to testify at the hearing of this matter, it will
23 modify, amend, and/or supplement this Response to the State Bar's Disciplinary
24 Charges to reflect said discovery additional information or documents, learns the
25 identity of additional witnesses.
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1 10. In response to the allegations set forth in paragraph 10 of the Notice of
2 Disciplinary Charges, Respondent denies the allegations contained therein.

3 11. In response to the allegations set forth in paragraph 11 of the Notice of
4 Disciplinary Charges, Respondent denies the allegations contained therein.

5 12. In response to the allegations set forth in paragraph 12 of the Notice of
6 Disciplinary Charges, Respondent denies the allegations contained therein.

7 13. In response to the allegations set forth in paragraph 13 of the Notice of
8 Disciplinary Charges, Respondent denies the allegations contained therein.

9 14. In response to the allegations set forth in paragraph 14 of the Notice of
10 Disciplinary Charges, Respondent denies the allegations contained therein.

11 15. In response to the allegations set forth in paragraph 15 of the Notice of
12 Disciplinary Charges, Respondent denies the allegations contained therein.

13 16. In response to the allegations set forth in paragraph 16 of the Notice of
14 Disciplinary Charges, Respondent denies the allegations contained therein.

15 17. In response to the allegations set forth in paragraph 17 of the Notice of
16 Disciplinary Charges, Respondent denies the allegations contained therein.

17 18. In response to the allegations set forth in paragraph 18 of the Notice of
18 Disciplinary Charges, Respondent denies the allegations contained therein.

19 19. In response to the allegations set forth in paragraph 19 of the Notice of
20 Disciplinary Charges, Respondent denies the allegations contained therein.

21 20. In response to the allegations set forth in paragraph 20 of the Notice of
22 Disciplinary Charges, Respondent denies the allegations contained therein.

23 21. In response to the allegations set forth in paragraph 21 of the Notice of
24 Disciplinary Charges, Respondent denies the allegations contained therein.
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1 22. In response to the allegations set forth in paragraph 22 of the Notice of
2 Disciplinary Charges, Respondent denies the allegations contained therein.

3 23. In response to the allegations set forth in paragraph 23 of the Notice of
4 Disciplinary Charges, Respondent denies the allegations contained therein.

5 24. In response to the allegations set forth in paragraph 24 of the Notice of
6 Disciplinary Charges, Respondent denies the allegations contained therein.

7 25. In response to the allegations set forth in paragraph 25 of the Notice of
8 Disciplinary Charges, Respondent denies the allegations contained therein.

9 26. In response to the allegations set forth in paragraph 26 of the Notice of
10 Disciplinary Charges, Respondent denies the allegations contained therein.

11 27. In response to the allegations set forth in paragraph 27 of the Notice of
12 Disciplinary Charges, Respondent denies the allegations contained therein.

13 28. In response to the allegations set forth in paragraph 28 of the Notice of
14 Disciplinary Charges, Respondent denies the allegations contained therein.

15 29. In response to the allegations set forth in paragraph 29 of the Notice of
16 Disciplinary Charges, Respondent denies the allegations contained therein.

17 30. In response to the allegations set forth in paragraph 30 of the Notice of
18 Disciplinary Charges, Respondent denies the allegations contained therein.

19 31. In response to the allegations set forth in paragraph 31 of the Notice of
20 Disciplinary Charges, Respondent denies the allegations contained therein.

21 32. In response to the allegations set forth in paragraph 32 of the Notice of
22 Disciplinary Charges, Respondent denies the allegations contained therein.

23 33. In response to the allegations set forth in paragraph 33 of the Notice of
24 Disciplinary Charges, Respondent denies the allegations contained therein.
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1 34. In response to the allegations set forth in paragraph 34 of the Notice of
2 Disciplinary Charges, Respondent denies the allegations contained therein.

3 35. In response to the allegations set forth in paragraph 35 of the Notice of
4 Disciplinary Charges, Respondent denies the allegations contained therein.

5 36. In response to the allegations set forth in paragraph 36 of the Notice of
6 Disciplinary Charges, Respondent denies the allegations contained therein.

7 37. In response to the allegations set forth in paragraph 37 of the Notice of
8 Disciplinary Charges, Respondent denies the allegations contained therein.

9 38. In response to the allegations set forth in paragraph 38 of the Notice of
10 Disciplinary Charges, Respondent denies the allegations contained therein.

11 39. In response to the allegations set forth in paragraph 39 of the Notice of
12 Disciplinary Charges, Respondent denies the allegations contained therein.

13 40. In response to the allegations set forth in paragraph 40 of the Notice of
14 Disciplinary Charges, Respondent denies the allegations contained therein.

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17 Count Two

18 41. In response to paragraph 41 of the Notice of Disciplinary Charges, Respondent
19 incorporates by reference all prior denials of the allegations referenced therein.

20 42. In response to the allegations set forth in paragraph 42 of the Notice of
21 Disciplinary Charges, Respondent denies the allegations contained therein.

22 43. In response to the allegations set forth in paragraph 43 of the Notice of
23 Disciplinary Charges, Respondent denies the allegations contained therein.

24 44. In response to the allegations set forth in paragraph 44 of the Notice of
25 Disciplinary Charges, Respondent denies the allegations contained therein.
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1 45. In response to the allegations set forth in paragraph 45 of the Notice of
2 Disciplinary Charges, Respondent denies the allegations contained therein.

3 46. In response to the allegations set forth in paragraph 46 of the Notice of
4 Disciplinary Charges, Respondent denies the allegations contained therein.

5 47. In response to the allegations set forth in paragraph 47 of the Notice of
6 Disciplinary Charges, Respondent denies the allegations contained therein.

7 48. In response to the allegations set forth in paragraph 48 of the Notice of
8 Disciplinary Charges, Respondent denies the allegations contained therein.

9 49. In response to the allegations set forth in paragraph 49 of the Notice of
10 Disciplinary Charges, Respondent denies the allegations contained therein.

11 50. In response to the allegations set forth in paragraph 50 of the Notice of
12 Disciplinary Charges, Respondent denies the allegations contained therein.

13 51. In response to the allegations set forth in paragraph 51 of the Notice of
14 Disciplinary Charges, Respondent denies the allegations contained therein.

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17 Count Three

18 52. In response to paragraph 52 of the Notice of Disciplinary Charges, Respondent
19 incorporates by reference all prior denials of the allegations referenced therein.

20 53. In response to the allegations set forth in paragraph 53 of the Notice of
21 Disciplinary Charges, Respondent denies the allegations contained therein.

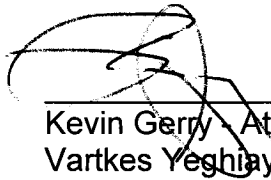
22
23 Count Four

24 54. In response to paragraph 54 of the Notice of Disciplinary Charges, Respondent
25 incorporates by reference all prior denials of the allegations referenced therein.

26 55. In response to the allegations set forth in paragraph 55 of the Notice of
27 Disciplinary Charges, Respondent denies the allegations contained therein.
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1 56. In response to the allegations set forth in paragraph 56 of the Notice of
2 Disciplinary Charges, Respondent denies the allegations contained therein.
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7 DATED: October 31, 2016



Kevin Gerry - Attorney for Respondents
Vartkes Yeghiayan and Rita Mahdessian

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PROOF OF SERVICE

I Kevin Gerry declare under penalty of perjury under the laws of the State of California that the following is true and correct:

I am over the age of 18 and not a party to this case.

My business address is: 711 Soledad Street
Santa Barbara, CA 93103

On the date stated below, the foregoing documents described as:

RITA MAHDESSIAN'S RESPONSE TO THE NOTICE OF DISCIPLINARY CHARGES

Were served on the interested parties in said action, by:

(MAIL SERVICE) placing the original or true copies thereof enclosed in a sealed addressed envelope, postage prepaid and deposited in the U. S. Mail addressed to:

(OVERNIGHT MAIL) placing the original or true copies thereof enclosed in sealed addressed overnight mail envelope to:

(PERSONAL SERVICE) delivering said documents to:

(E-MAIL) causing delivery via electronic mail to:

The following addressees:

Edward J. McIntyre
Attorney at Law
750 B Street, Suite 2100
San Diego, CA 92101
edwardmcintyre1789@gmail.com

Executed in Santa Barbara, California on:

10/31/16

Date



Declarant