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FILED

SEP 04 2013

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

8 **THE STATE BAR COURT**
9 **OF THE STATE BAR OF CALIFORNIA**
10 **HEARING DEPARTMENT - LOS ANGELES**

11 **In the Matter of**

12
13 **PAMELA GERBER-GRESSIER**
14 **No. 140353**

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21 **A Member of the State Bar**

) **Case Nos. 12-0-13126; 12-0-13240;**
) **12-0-14890; 12-0-14172;**
) **12-0-14965; 12-0-15997;**
) **12-0-16100; 12-0-16597;**
) **12-0-16818; 12-0-17024;**
) **12-0-17537; 12-0-17709;**
) **12-0-17526; 12-0-17907;**
) **12-0-18009; 12-0-18122;**
) **12-0-18203; 13-0-10175;**
) **13-0-10423; 13-0-10474;**
) **13-0-10714; 13-0-11223;**
) **13-0-11363; 13-0-11698;**
) **13-0-11834; 13-0-11896;**
) **13-0-12459**

) **RESPONSE TO NOTICE OF**
) **DISCIPLINARY CHARGES**

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23
24 **All further notices in relation to this proceeding are to be sent to:**

25 **Arthur L. Margolis, Esq.**
26 **MARGOLIS & MARGOLIS LLP**
27 **Attorneys at Law**
28 **2000 Riverside Drive**
Los Angeles, CA 90039
(323) 953-8996



1 Respondent denies the allegations stated in that Paragraph.

2 53. Responding to Paragraph 53 of the Notice of Disciplinary Charges,
3 Respondent denies the allegations stated in that Paragraph.

4 **COUNT TEN**

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6 54. Responding to Paragraph 54 of the Notice of Disciplinary Charges,
7 Respondent denies the allegations stated in that Paragraph.

8 55. Responding to Paragraph 55 of the Notice of Disciplinary Charges,
9 Respondent realleges and incorporates her responses to the allegations stated
10 in Counts Seven through Nine.

11 56. Responding to Paragraph 56 of the Notice of Disciplinary Charges,
12 Respondent denies the assumptions and allegations stated in that Paragraph.

13 57. Responding to Paragraph 57 of the Notice of Disciplinary Charges,
14 Respondent denies the assumptions and allegations stated in that Paragraph.

15 **COUNT ELEVEN**

16 58. Responding to Paragraph 58 of the Notice of Disciplinary Charges,
17 Respondent denies the allegations stated in that Paragraph.

18 59. Responding to Paragraph 59 of the Notice of Disciplinary Charges,
19 Respondent realleges and incorporates her responses to the allegations stated
20 in Paragraphs 2 through 4, and 24 through 25.

21 60. Responding to Paragraph 60 of the Notice of Disciplinary Charges,
22 Respondent denies the allegations stated in that Paragraph.

23 61. Responding to Paragraph 61 of the Notice of Disciplinary Charges,
24 Respondent denies the allegations stated in that Paragraph.

25 62. Responding to Paragraph 62 of the Notice of Disciplinary Charges,
26 Respondent denies the allegations stated in that Paragraph.
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COUNT FOURTEEN

73. Responding to Paragraph 73 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

74. Responding to Paragraph 74 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her responses to the allegations stated in Counts Eleven through Thirteen.

75. Responding to Paragraph 75 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

76. Responding to Paragraph 76 of the Notice of Disciplinary Charges, Respondent denies the allegations and assumptions stated in that Paragraph except that she admits that a refund was provided to Danskin.

77. Responding to Paragraph 77 of the Notice of Disciplinary Charges, Respondent denies the allegations and assumptions stated in that Paragraph.

COUNT FIFTEEN

78. Responding to Paragraph 78 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

79. Responding to Paragraph 79 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her responses to the allegations stated in Counts Eleven through Fourteen.

80. Responding to Paragraph 80 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

81. Responding to Paragraph 81 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

82. Responding to Paragraph 82 of the Notice of Disciplinary Charges, Respondent denies the allegations and assumptions stated in that Paragraph.

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COUNT SIXTEEN

83. Responding to Paragraph 83 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

84. Responding to Paragraph 84 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her responses to the allegations stated in Counts Eleven through Fifteen.

85. Responding to Paragraph 85 of the Notice of Disciplinary Charges, Respondent denies the allegations and assumptions stated in that Paragraph.

86. Responding to Paragraph 86 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph. Further, there was no longer an attorney-client relationship; and Rule 3-400 did not apply to such transaction.

87. Responding to Paragraph 87 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph. Further, there was no longer an attorney-client relationship; and Rule 3-400 did not apply to such a transaction.

COUNT SEVENTEEN

88. Responding to Paragraph 88 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

89. Responding to Paragraph 89 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her responses to the allegations stated in Paragraphs 2 through 4.

90. Responding to Paragraph 90 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

91. Responding to Paragraph 91 of the Notice of Disciplinary Charges,

1 Respondent admits the allegations stated in that Paragraph.

2 92. Responding to Paragraph 92 of the Notice of Disciplinary Charges,
3 Respondent denies the allegations stated in that Paragraph.

4 93. Responding to Paragraph 93 of the Notice of Disciplinary Charges,
5 Respondent denies the allegations stated in that Paragraph.

6 94. Responding to Paragraph 94 of the Notice of Disciplinary Charges,
7 Respondent denies the allegations stated in that Paragraph.

8 95. Responding to Paragraph 95 of the Notice of Disciplinary Charges,
9 Respondent denies the allegations stated in that Paragraph.

10 96. Responding to Paragraph 96 of the Notice of Disciplinary Charges,
11 Respondent denies the allegations stated in that Paragraph.

12 **COUNT EIGHTEEN**

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14 97. Responding to Paragraph 97 of the Notice of Disciplinary Charges,
15 Respondent denies the allegations stated in that Paragraph.

16 98. Responding to Paragraph 98 of the Notice of Disciplinary Charges,
17 Respondent realleges and incorporates her responses to the allegations stated
18 in Count Seventeen.

19 99. Responding to Paragraph 99 of the Notice of Disciplinary Charges,
20 Respondent denies the allegations stated in that Paragraph.

21 100. Responding to Paragraph 100 of the Notice of Disciplinary Charges,
22 Respondent denies the allegations stated in that Paragraph.

23 **COUNT NINETEEN**

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25 101. Responding to Paragraph 101 of the Notice of Disciplinary Charges,
26 Respondent denies the allegations stated in that Paragraph.

27 102. Responding to Paragraph 102 of the Notice of Disciplinary
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1 Charges, Respondent realleges and incorporates her responses to Counts
2 Seventeen through Eighteen.

3 103. Responding to Paragraph 103 of the Notice of Disciplinary Charges,
4 Respondent denies the allegations stated in that Paragraph.
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6 104. Responding to Paragraph 104 of the Notice of Disciplinary Charges,
7 Respondent denies the allegations stated in that Paragraph.

8 **COUNT TWENTY**

9 105. Responding to Paragraph 105 of the Notice of Disciplinary Charges,
10 Respondent denies the allegations stated in that Paragraph.

11 106. Responding to Paragraph 106 of the Notice of Disciplinary
12 Charges, Respondent realleges and incorporates her responses to Counts
13 Seventeen through Nineteen.

14 107. Responding to Paragraph 107 of the Notice of Disciplinary Charges,
15 Respondent denies the allegations stated in that Paragraph.

16 108. Responding to Paragraph 108 of the Notice of Disciplinary Charges,
17 Respondent denies the allegations stated in that Paragraph.

18 109. Responding to Paragraph 109 of the Notice of Disciplinary Charges,
19 Respondent denies the allegations stated in that Paragraph.

20 110. Responding to Paragraph 110 of the Notice of Disciplinary Charges,
21 Respondent denies the allegations stated in that Paragraph. Further, the
22 attorney-client relationship had ended; and Rule 3-400 was not applicable.
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24 111. Responding to Paragraph 111 of the Notice of Disciplinary Charges,
25 Respondent denies the allegations stated in that Paragraph. Further, the
26 attorney-client relationship had ended; and Rule 3-400 was not applicable.
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COUNT TWENTY-ONE

112. Responding to Paragraph 112 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

113. Responding to Paragraph 113 of the Notice of Disciplinary Charges, respondent realleges and incorporates her responses to the allegations stated in Paragraphs 2 through 4.

114. Responding to Paragraph 114 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

115. Responding to Paragraph 115 of the Notice of Disciplinary Charges, Respondent admits the allegations stated in that Paragraph.

116. Responding to Paragraph 116 of the Notice of Disciplinary Charges, Respondent admits the allegations stated in that Paragraph.

117. Responding to Paragraph 117 of the Notice of Disciplinary Charges, Respondent admits the allegations stated in that Paragraph.

118. Responding to Paragraph 118 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

119. Responding to Paragraph 119 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

120. Responding to Paragraph 120 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

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COUNT TWENTY-TWO

121. Responding to Paragraph 121 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

122. Responding to Paragraph 122 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her responses to the

1 allegations stated in Count Twenty-One.

2 123. Responding to Paragraph 123 of the Notice of Disciplinary Charges,
3 Respondent denies the allegations stated in that Paragraph.

4 124. Responding to Paragraph 124 of the Notice of Disciplinary Charges,
5 Respondent denies the allegations stated in that Paragraph.

6 **COUNT TWENTY-THREE**

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8 125. Responding to Paragraph 125 of the Notice of Disciplinary Charges,
9 Respondent denies the allegations stated in that Paragraph.

10 126. Responding to Paragraph 126 of the Notice of Disciplinary
11 Charges, Respondent realleges and incorporates her responses to Counts
12 Twenty-One through Twenty-Two.

13 127. Responding to Paragraph 127 of the Notice of Disciplinary Charges,
14 Respondent denies the allegations stated in that Paragraph.

15 128. Responding to Paragraph 128 of the Notice of Disciplinary Charges,
16 Respondent denies the allegations stated in that Paragraph.

17 129. Responding to Paragraph 129 of the Notice of Disciplinary Charges,
18 Respondent denies the allegations stated in that Paragraph.

19 **COUNT TWENTY-FOUR**

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21 130. Responding to Paragraph 130 of the Notice of Disciplinary Charges,
22 Respondent denies the allegations stated in that Paragraph.

23 131. Responding to Paragraph 131 of the Notice of Disciplinary Charges,
24 Respondent realleges and incorporates her responses to the allegations stated
25 in Counts Twenty-One through Twenty-Three.

26 132. Responding to Paragraph 132 of the Notice of Disciplinary Charges,
27 Respondent denies the allegations stated in that Paragraph.

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COUNT TWENTY-NINE

153. Responding to Paragraph 153 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

154. Responding to Paragraph 154 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her responses to Counts Twenty-Six through Twenty-Eight.

155. Responding to Paragraph 155 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

156. Responding to Paragraph 156 of the Notice of Disciplinary Charges, Respondent denies the allegations and assumptions stated in that Paragraph.

157. Responding to Paragraph 157 of the Notice of Disciplinary Charges, Respondent denies the allegations and assumptions stated in that Paragraph except she admits that she provided a refund.

158. Responding to Paragraph 158 of the Notice of Disciplinary Charges, Respondent denies the allegations and assumptions stated in that Paragraph except she admits that she provided a refund. Further, at the time of the refund, there was no longer an attorney-client relationship, and Rule 3-400 did not apply to such transaction.

159. Responding to Paragraph 159 of the Notice of Disciplinary Charges, Respondent denies the allegations and assumptions stated in that Paragraph except she admits that she provided a refund. Further, at the time of the refund, there was no longer an attorney-client relationship, and Rule 3-400 did not apply to such transaction.

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COUNT THIRTY

160. Responding to Paragraph 160 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

161. Responding to Paragraph 161 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her responses to the allegations stated in Paragraphs 2 through 4, and 24 through 25.

162. Responding to Paragraph 162 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

163. Responding to Paragraph 163 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

164. Responding to Paragraph 164 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

165. Responding to Paragraph 165 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

166. Responding to Paragraph 166 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

COUNT THIRTY-ONE

167. Responding to Paragraph 167 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

168. Responding to Paragraph 168 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her Responses to the allegations stated in Count Thirty.

169. Responding to Paragraph 169 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

1 170. Responding to Paragraph 170 of the Notice of Disciplinary Charges,
2 Respondent denies the allegations stated in that Paragraph.

3 **COUNT THIRTY-TWO**

4 171. Responding to Paragraph 171 of the Notice of Disciplinary Charges,
5 Respondent denies the allegations stated in that Paragraph.

6 172. Responding to Paragraph 172 of the Notice of Disciplinary
7 Charges, Respondent realleges and incorporates her responses to Counts
8 Thirty through Thirty-One.

9 173. Responding to Paragraph 173 of the Notice of Disciplinary Charges,
10 Respondent denies the allegations stated in that Paragraph.

11 174. Responding to Paragraph 174 of the Notice of Disciplinary Charges,
12 Respondent denies the allegations stated in that Paragraph.

13 **COUNT THIRTY-THREE**

14 175. Responding to Paragraph 175 of the Notice of Disciplinary Charges,
15 Respondent denies the allegations stated in that Paragraph.

16 176. Responding to Paragraph 176 of the Notice of Disciplinary
17 Charges, Respondent realleges and incorporates here responses to Counts
18 Thirty through Thirty-Two.

19 177. Responding to Paragraph 177 of the Notice of Disciplinary Charges,
20 Respondent denies the allegations stated in that Paragraph.

21 178. Responding to Paragraph 178 of the Notice of Disciplinary Charges,
22 Respondent denies the allegations stated in that Paragraph.

23 179. Responding to Paragraph 179 of the Notice of Disciplinary Charges,
24 Respondent denies the allegations stated in that Paragraph except she admits
25 that a refund was provided.
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1 180. Responding to Paragraph 180 of the Notice of Disciplinary Charges,
2 Respondent denies the allegations stated in that Paragraph.

3 **COUNT THIRTY-FOUR**

4 181. Responding to Paragraph 181 of the Notice of Disciplinary Charges,
5 Respondent denies the allegations stated in that Paragraph.

6 182. Responding to Paragraph 182 of the Notice of Disciplinary Charges,
7 Respondent realleges and incorporates her responses to Paragraphs 2 through
8 4, and 24 through 25.

9 183. Responding to Paragraph 183 of the Notice of Disciplinary Charges,
10 Respondent denies the allegations stated in that Paragraph.

11 184. Responding to Paragraph 184 of the Notice of Disciplinary Charges,
12 Respondent denies the allegations stated in that Paragraph.

13 185. Responding to Paragraph 185 of the Notice of Disciplinary Charges,
14 Respondent denies the allegations stated in that Paragraph.

15 186. Responding to Paragraph 186 of the Notice of Disciplinary Charges,
16 Respondent denies the allegations stated in that Paragraph.

17 187. Responding to Paragraph 187 of the Notice of Disciplinary Charges,
18 Respondent denies the allegations stated in that Paragraph.

19 **COUNT THIRTY-FIVE**

20 188. Responding to Paragraph 188 of the Notice of Disciplinary Charges,
21 Respondent denies the allegations stated in that Paragraph.

22 189. Responding to Paragraph 189 of the Notice of Disciplinary
23 Charges, Respondent realleges and incorporates her responses to the
24 allegations stated in Count Thirty-Four.

25 190. Responding to Paragraph 190 of the Notice of Disciplinary Charges,
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1 Respondent denies the allegations stated in that Paragraph.

2 191. Responding to Paragraph 191 of the Notice of Disciplinary Charges,
3 Respondent denies the allegations stated in that Paragraph.

4 **COUNT THIRTY-SIX**

5 192. Responding to Paragraph 192 of the Notice of Disciplinary Charges,
6 Respondent denies the allegations stated in that Paragraph.

7 193. Responding to Paragraph 193 of the Notice of Disciplinary Charges,
8 Respondent realleges and incorporates her responses to the allegations stated
9 in Counts Thirty-Four through Thirty-Five.

10 194. Responding to Paragraph 194 of the Notice of Disciplinary Charges,
11 Respondent denies the allegations stated in that Paragraph.

12 195. Responding to Paragraph 195 of the Notice of Disciplinary Charges,
13 Respondent denies the allegations stated in that Paragraph.

14 **COUNT THIRTY-SEVEN**

15 196. Responding to Paragraph 196 of the Notice of Disciplinary Charges,
16 Respondent denies the allegations stated in that Paragraph.

17 197. Responding to Paragraph 197 of the Notice of Disciplinary Charges,
18 Respondent realleges and incorporates her responses to the allegations stated
19 in Counts Thirty-Four through Thirty-Six.

20 198. Responding to Paragraph 198 of the Notice of Disciplinary Charges,
21 Respondent denies the allegations and assumptions stated in that Paragraph.

22 199. Responding to Paragraph 199 of the Notice of Disciplinary Charges,
23 Respondent denies the allegations and assumptions stated in that Paragraph.

24 200. Responding to Paragraph 200 of the Notice of Disciplinary Charges,
25 Respondent denies the allegations and assumptions stated in that Paragraph.

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COUNT FORTY-FOUR

232. Responding to Paragraph 232 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

233. Responding to Paragraph 233 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her responses to the allegations stated in Paragraphs 2 through 4, and 7 through 8.

234. Responding to Paragraph 234 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

235. Responding to Paragraph 235 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

236. Responding to Paragraph 236 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

237. Responding to Paragraph 237 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

238. Responding to Paragraph 238 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

COUNT FORTY-FIVE

239. Responding to Paragraph 239 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

240. Responding to Paragraph 240 of the Notice of Disciplinary Charges, Respondent realleges and incorporates his responses to the allegations stated in Count Forty-Four.

241. Responding to Paragraph 241 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

1 Respondent denies the allegations stated in that Paragraph.

2 253. Responding to Paragraph 253 of the Notice of Disciplinary Charges,
3 Respondent denies the allegations stated in that Paragraph.

4 **COUNT FORTY-EIGHT**

5 254. Responding to Paragraph 254 of the Notice of Disciplinary Charges,
6 Respondent denies the allegations stated in that Paragraph.

7 255. Responding to Paragraph 255 of the Notice of Disciplinary Charges,
8 Respondent realleges and incorporates her responses to the allegations stated
9 in Count Forty-Seven.

10 256. Responding to Paragraph 256 of the Notice of Disciplinary Charges,
11 Respondent denies the allegations stated in that Paragraph.

12 257. Responding to Paragraph 257 of the Notice of Disciplinary Charges,
13 Respondent denies the allegations stated in that Paragraph.

14 **COUNT FORTY-NINE**

15 258. Responding to Paragraph 258 of the Notice of Disciplinary Charges,
16 Respondent denies the allegations stated in that Paragraph.

17 259. Responding to Paragraph 259 of the Notice of Disciplinary Charges,
18 Respondent realleges and incorporates her responses to the allegations stated
19 in Counts Forty-Seven through Forty-Eight.

20 260. Responding to Paragraph 260 of the Notice of Disciplinary Charges,
21 Respondent denies the allegations stated in that Paragraph.

22 261. Responding to Paragraph 261 of the Notice of Disciplinary Charges,
23 Respondent denies the allegations stated in that Paragraph.

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COUNT FIFTY

262. Responding to Paragraph 262 of the Notice of Disciplinary Charges,
Respondent denies the allegations stated in that Paragraph.

263. Responding to Paragraph 263 of the Notice of Disciplinary Charges,
Respondent realleges and incorporates her responses to the allegations stated
in Counts Forty-Seven through Forty-Nine.

264. Responding to Paragraph 264 of the Notice of Disciplinary Charges,
Respondent denies the allegations stated in that Paragraph.

265. Responding to Paragraph 265 of the Notice of Disciplinary Charges,
Respondent denies the allegations stated in that Paragraph.

266. Responding to Paragraph 266 of the Notice of Disciplinary Charges,
Respondent denies the allegations stated in that Paragraph.

267. Responding to Paragraph 267 of the Notice of Disciplinary Charges,
Respondent denies the allegations stated in that Paragraph.

268. Responding to Paragraph 268 of the Notice of Disciplinary Charges,
Respondent denies the allegations stated in that Paragraph.

COUNT FIFTY-ONE

269. Responding to Paragraph 268 of the Notice of Disciplinary Charges,
Respondent denies the allegations stated in that Paragraph.

270. Responding to Paragraph 270 of the Notice of Disciplinary Charges,
Respondent realleges and incorporates her responses to Paragraphs 2 through
4, and 24 through 25.

271. Responding to Paragraph 271 of the Notice of Disciplinary Charges,
Respondent denies the allegations stated in that Paragraph.

272. Responding to Paragraph 272 of the Notice of Disciplinary Charges,

1 Respondent denies the allegations stated in that Paragraph.

2 273. Responding to Paragraph 273 of the Notice of Disciplinary Charges,
3 Respondent denies the allegations stated in that Paragraph.

4 274. Responding to Paragraph 274 of the Notice of Disciplinary Charges,
5 Respondent denies the allegations stated in that Paragraph.

6 275. Responding to Paragraph 275 of the Notice of Disciplinary Charges,
7 Respondent denies the allegations stated in that Paragraph.

8 **COUNT FIFTY-TWO**

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10 276. Responding to Paragraph 276 of the Notice of Disciplinary Charges,
11 Respondent denies the allegations stated in that Paragraph.

12 277. Responding to Paragraph 277 of the Notice of Disciplinary Charges,
13 Respondent realleges and incorporates her responses to Count Fifty-One.

14 278. Responding to Paragraph 278 of the Notice of Disciplinary Charges,
15 Respondent denies the allegations stated in that Paragraph.

16 279. Responding to Paragraph 279 of the Notice of Disciplinary Charges,
17 Respondent denies the allegations stated in that Paragraph.

18 **COUNT FIFTY-THREE**

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20 280. Responding to Paragraph 280 of the Notice of Disciplinary Charges,
21 Respondent denies the allegations stated in that Paragraph.

22 281. Responding to Paragraph 281 of the Notice of Disciplinary Charges,
23 Respondent realleges and incorporates her responses to Counts Fifty-One
24 through Fifty-Two.

25 282. Responding to Paragraph 282 of the Notice of Disciplinary Charges,
26 Respondent denies the allegations stated in that Paragraph.

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Respondent denies the allegations stated in that Paragraph.

294. Responding to Paragraph 294 of the Notice of Disciplinary Charges,

Respondent denies the allegations stated in that Paragraph.

COUNT FIFTY-SIX

295. Responding to Paragraph 295 of the Notice of Disciplinary Charges,

Respondent denies the allegations stated in that Paragraph.

296. Responding to Paragraph 296 of the Notice of Disciplinary Charges,

Respondent realleges and incorporates her responses to the allegations stated in Count Fifty-Five.

297. Responding to Paragraph 297 of the Notice of Disciplinary Charges,

Respondent denies the allegations stated in that Paragraph.

298. Responding to Paragraph 298 of the Notice of Disciplinary Charges,

Respondent denies the allegations stated in that Paragraph.

COUNT FIFTY-SEVEN

299. Responding to Paragraph 299 of the Notice of Disciplinary Charges,

Respondent denies the allegations stated in that Paragraph.

300. Responding to Paragraph 300 of the Notice of Disciplinary Charges,

Respondent realleges and incorporates her responses to the allegations stated in Counts Fifty-Five through Fifty-Six.

301. Responding to Paragraph 301 of the Notice of Disciplinary Charges,

Respondent denies the allegations stated in that Paragraph.

302. Responding to Paragraph 302 of the Notice of Disciplinary Charges,

Respondent denies the allegations stated in that Paragraph.

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COUNT FIFTY-EIGHT

303. Responding to Paragraph 303 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

304. Responding to Paragraph 304 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her responses to the allegations stated in Counts Fifty Five through Fifty-Seven.

305. Responding to Paragraph 305 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

306. Responding to Paragraph 306 of the Notice of Disciplinary Charges, Respondent denies the allegations and assumptions stated in that Paragraph except that Respondent admits that she made a full refund..

307. Responding to Paragraph 307 of the Notice of Disciplinary Charges, Respondent denies the allegations and assumptions stated in that Paragraph.

COUNT FIFTY-NINE

308. Responding to Paragraph 308 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

309. Responding to Paragraph 309 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her responses to the allegations stated in Paragraphs 2 through 4, and 90 through 91.

310. Responding to Paragraph 310 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

311. Responding to Paragraph 311 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

312. Responding to Paragraph 312 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

1 373. Responding to Paragraph 373 of the Notice of Disciplinary
2 Charges, Respondent denies the assumptions and allegations stated in that
3 Paragraph.
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5 **COUNT SEVENTY-THREE**

6 374. Responding to Paragraph 374 of the Notice of Disciplinary Charges,
7 Respondent denies the allegations stated in that Paragraph.

8 375. Responding to Paragraph 375 of the Notice of Discipline Charges,
9 Respondent realleges and incorporates her responses to the allegations stated
10 in Paragraphs 2 through 4.

11 376. Responding to Paragraph 376 of the Notice of Disciplinary Charges,
12 Respondent denies the allegations stated in that Paragraph.

13 377. Responding to Paragraph 377 of the Notice of Disciplinary Charges,
14 Respondent admits the allegations stated in that Paragraph.

15 378. Responding to Paragraph 378 of the Notice of Disciplinary Charges,
16 Respondent denies the allegations stated in that Paragraph.

17 379. Responding to Paragraph 379 of the Notice of Disciplinary Charges,
18 Respondent denies the allegations stated in that Paragraph.

19 380. Responding to Paragraph 380 of the Notice of Disciplinary Charges,
20 Respondent denies the allegations stated in that Paragraph.

21 381. Responding to Paragraph 381 of the Notice of Disciplinary Charges,
22 Respondent denies the allegations stated in that Paragraph.

23 382. Responding to Paragraph 382 of the Notice of Disciplinary Charges,
24 Respondent denies the allegations stated in that Paragraph.
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COUNT SEVENTY-FOUR

383. Responding to Paragraph 383 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

384. Responding to Paragraph 384 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her responses to the allegations stated in Count Seventy-Three.

385. Responding to Paragraph 385 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

386. Responding to Paragraph 386 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

COUNT SEVENTY-FIVE

387. Responding to Paragraph 387 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

388. Responding to Paragraph 388 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her responses to the allegations stated in Counts Seventy-Three through Seventy-Four.

389. Responding to Paragraph 389 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

390. Responding to Paragraph 390 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

COUNT SEVENTY-SIX

391. Responding to Paragraph 391 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

392. Responding to Paragraph 392 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her responses to the

1 allegations stated in Paragraphs 2 through 4, and 376 through 377.

2 393. Responding to Paragraph 393 of the Notice of Disciplinary Charges,
3 Respondent denies the allegations stated in that paragraph.

4 394. Responding to Paragraph 394 of the Notice of Disciplinary Charges,
5 Respondent denies the allegations stated in that Paragraph.

6 395. Responding to Paragraph 395 of the Notice of Disciplinary Charges,
7 Respondent denies the allegations stated in that Paragraph.

8 396. Responding to Paragraph 396 of the Notice of Disciplinary Charges,
9 Respondent denies the allegations stated in that Paragraph.

10 397. Responding to Paragraph 397 of the Notice of Disciplinary Charges,
11 Respondent denies the allegations stated in that Paragraph.

12 **COUNT SEVENTY-SEVEN**

13 398. Responding to Paragraph 398 of the Notice of Disciplinary Charges,
14 Respondent denies the allegations stated in that Paragraph.

15 399. Responding to Paragraph 399 of the Notice of Disciplinary
16 Charges, Respondent realleges and incorporates her responses to the
17 allegations stated in Count Seventy-Six.

18 400. Responding to Paragraph 400 of the Notice of Disciplinary Charges,
19 Respondent denies the allegations stated in that Paragraph.

20 401. Responding to Paragraph 401 of the Notice of Disciplinary Charges,
21 Respondent denies the allegations stated in that Paragraph.

22 **COUNT SEVENTY-EIGHT**

23 402. Responding to Paragraph 402 of the Notice of Disciplinary Charges,
24 Respondent denies the allegations stated in that Paragraph.

25 403. Responding to Paragraph 403 of the Notice of Disciplinary
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1 Charges, Respondent realleges and incorporates her responses to the
2 allegations stated in Count Seventy-Six through Seventy-Seven.

3 404. Responding to Paragraph 404 of the Notice of Disciplinary Charges,
4 Respondent denies the allegations stated in that Paragraph.
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6 405. Responding to Paragraph 405 of the Notice of Disciplinary Charges,
7 Respondent denies the allegations stated in that Paragraph.

8 **COUNT SEVENTY-NINE**

9 406. Responding to Paragraph 406 of the Notice of Disciplinary Charges,
10 Respondent denies the allegations stated in that Paragraph.

11 407. Responding to Paragraph 407 of the Notice of Disciplinary
12 Charges, Respondent realleges and incorporates her responses to the
13 allegations stated in Paragraphs 2 through 4.

14 408. Responding to Paragraph 408 of the Notice of Disciplinary Charges,
15 Respondent denies the allegations stated in that Paragraph.

16 409. Responding to Paragraph 409 of the Notice of Disciplinary Charges,
17 Respondent admits the allegations stated in that Paragraph.

18 410. Responding to Paragraph 410 of the Notice of Disciplinary Charges,
19 Respondent denies the allegations stated in that Paragraph.
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21 411. Responding to Paragraph 411 of the Notice of Disciplinary Charges,
22 Respondent denies the allegations stated in that Paragraph.

23 412. Responding to Paragraph 412 of the Notice of Disciplinary Charges,
24 Respondent denies the allegations stated in that Paragraph.

25 413. Responding to Paragraph 413 of the Notice of Disciplinary Charges,
26 Respondent denies the allegations stated in that Paragraph.
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1 414. Responding to Paragraph 414 of the Notice of Disciplinary Charges,
2 Respondent denies the allegations stated in that Paragraph.

3 **COUNT EIGHTY**

4 415. Responding to Paragraph 415 of the Notice of Disciplinary Charges,
5 Respondent denies the allegations stated in that Paragraph.

6 416. Responding to Paragraph 416 of the Notice of Disciplinary
7 Charges, Respondent realleges and incorporates her responses to the
8 allegations stated in Count Seventy-Nine.

9 417. Responding to Paragraph 417 of the Notice of Disciplinary Charges,
10 Respondent denies the allegations stated in that Paragraph.

11 418. Responding to Paragraph 418 of the Notice of Disciplinary Charges,
12 Respondent denies the allegations stated in that Paragraph.

13 **COUNT EIGHTY-ONE**

14 419. Responding to Paragraph 419 of the Notice of Disciplinary Charges,
15 Respondent denies the allegations stated in that Paragraph.

16 420. Responding to Paragraph 420 of the Notice of Disciplinary
17 Charges, Respondent realleges and incorporates her responses to the
18 allegations stated in Counts Seventy-Nine through Eighty.

19 421. Responding to Paragraph 421 of the Notice of Disciplinary Charges,
20 Respondent denies the allegations stated in that Paragraph.

21 422. Responding to Paragraph 422 of the Notice of Disciplinary Charges,
22 Respondent denies the allegations stated in that Paragraph.

23 **COUNT EIGHTY-TWO**

24 423. Responding to Paragraph 423 of the Notice of Disciplinary Charges,
25 Respondent denies the allegations stated in that Paragraph.

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COUNT EIGHTY-FOUR

434. Responding to Paragraph 434 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

435. Responding to Paragraph 435 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her responses to the allegations stated in Count Eighty-Three.

436. Responding to Paragraph 436 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

437. Responding to Paragraph 437 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

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COUNT EIGHTY-FIVE

438. Responding to Paragraph 438 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

439. Responding to Paragraph 439 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her responses to the allegations stated in Counts Eighty-Three through Eighty-Four.

440. Responding to Paragraph 440 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

441. Responding to Paragraph 441 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

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COUNT EIGHTY-SIX

442. Responding to Paragraph 442 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that Paragraph.

443. Responding to Paragraph 443 of the Notice of Disciplinary Charges, Respondent realleges and incorporates her responses to the

1 allegations stated in Counts Eighty-Three through Eighty-Four.

2 444. Responding to Paragraph 444 of the Notice of Disciplinary Charges,
3 Respondent denies the allegations stated in that Paragraph.

4 445. Responding to Paragraph 445 of the Notice of Disciplinary Charges,
5 Respondent denies the allegations stated in that Paragraph.

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7 **COUNT EIGHTY-SEVEN**

8 446. Responding to Paragraph 446 of the Notice of Disciplinary Charges,
9 Respondent denies the allegations stated in that Paragraph.

10 447. Responding to Paragraph 447 of the Notice of Disciplinary
11 Charges, Respondent realleges and incorporates her responses to the
12 allegations stated in Paragraphs 2 through 4.

13 448. Responding to Paragraph 448 of the Notice of Disciplinary Charges,
14 Respondent denies the allegations stated in that Paragraph.

15 449. Responding to Paragraph 449 of the Notice of Disciplinary Charges,
16 Respondent admits the allegations stated in that Paragraph.

17 450. Responding to Paragraph 450 of the Notice of Disciplinary Charges,
18 Respondent denies the allegations stated in that Paragraph.

19 451. Responding to Paragraph 451 of the Notice of Disciplinary Charges,
20 Respondent denies the allegations stated in that Paragraph.

21 452. Responding to Paragraph 452 of the Notice of Disciplinary Charges,
22 Respondent denies the allegations stated in that Paragraph.

23 453. Responding to Paragraph 453 of the Notice of Disciplinary Charges,
24 Respondent denies the allegations stated in that Paragraph.

25 454. Responding to Paragraph 454 of the Notice of Disciplinary Charges,
26 Respondent denies the allegations stated in that Paragraph.
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1 allegations stated in Counts Eighty-Eight through Eighty-Nine.

2 465. Responding to Paragraph 465 of the Notice of Disciplinary Charges,
3 Respondent denies the allegations stated in that Paragraph.

4 466. Responding to Paragraph 466 of the Notice of Disciplinary Charges,
5 Respondent denies the assumptions and allegations stated in that Paragraph.
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7 **COUNT NINETY-ONE**

8 467. Responding to Paragraph 467 of the Notice of Disciplinary Charges,
9 Respondent denies the allegations stated in that Paragraph.

10 468. Responding to Paragraph 468 of the Notice of Disciplinary
11 Charges, Respondent realleges and incorporates her responses to the
12 allegations stated in Paragraphs 2 through 4.

13 469. Responding to Paragraph 469 of the Notice of Disciplinary Charges,
14 Respondent denies the allegations stated in that Paragraph.

15 470. Responding to Paragraph 470 of the Notice of Disciplinary Charges,
16 Respondent admits the allegations stated in that Paragraph.

17 471. Responding to Paragraph 471 of the Notice of Disciplinary Charges,
18 Respondent denies the allegations stated in that Paragraph.

19 472. Responding to Paragraph 472 of the Notice of Disciplinary Charges,
20 Respondent denies the allegations stated in that Paragraph.

21 473. Responding to Paragraph 473 of the Notice of Disciplinary Charges,
22 Respondent denies the allegations stated in that Paragraph.

23 474. Responding to Paragraph 474 of the Notice of Disciplinary Charges,
24 Respondent denies the allegations stated in that Paragraph.

25 475. Responding to Paragraph 475 of the Notice of Disciplinary Charges,
26 Respondent denies the allegations stated in that Paragraph.
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1 allegations stated in Counts Ninety-One through Ninety-Three.

2 486. Responding to Paragraph 486 of the Notice of Disciplinary Charges,
3 Respondent denies the assumptions and allegations stated in that Paragraph.

4 487. Responding to Paragraph 487 of the Notice of Disciplinary Charges,
5 Respondent denies the assumptions and allegations stated in that Paragraph.

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7 **COUNT NINETY-FIVE**

8 488. Responding to Paragraph 488 of the Notice of Disciplinary Charges,
9 Respondent denies the allegations stated in that Paragraph.

10 489. Responding to Paragraph 489 of the Notice of Disciplinary
11 Charges, Respondent realleges and incorporates her responses to the
12 allegations stated in Paragraphs 2 through 4, and 24 through 25.

13 490. Responding to Paragraph 490 of the Notice of Disciplinary Charges,
14 Respondent denies the allegations stated in that Paragraph.

15 491. Responding to Paragraph 491 of the Notice of Disciplinary Charges,
16 Respondent denies the allegations stated in that Paragraph.

17 492. Responding to Paragraph 492 of the Notice of Disciplinary Charges,
18 Respondent denies the allegations stated in that Paragraph.

19 493. Responding to Paragraph 493 of the Notice of Disciplinary Charges,
20 Respondent denies the allegations stated in that Paragraph.

21 494. Responding to Paragraph 494 of the Notice of Disciplinary Charges,
22 Respondent denies the allegations stated in that Paragraph.

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24 **COUNT NINETY-SIX**

25 495. Responding to Paragraph 495 of the Notice of Disciplinary Charges,
26 Respondent denies the allegations stated in that Paragraph.

27 496. Responding to Paragraph 496 of the Notice of Disciplinary
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1 Charges, Respondent realleges and incorporates her responses to the
2 allegations stated in Count Ninety-Five.

3 497. Responding to Paragraph 497 of the Notice of Disciplinary Charges,
4 Respondent denies the allegations stated in that Paragraph.

5 498. Responding to Paragraph 498 of the Notice of Disciplinary Charges,
6 Respondent denies the allegations stated in that Paragraph.

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8 **COUNT NINETY-SEVEN**

9 499. Responding to Paragraph 499 of the Notice of Disciplinary Charges,
10 Respondent denies the allegations stated in that Paragraph.

11 500. Responding to Paragraph 500 of the Notice of Disciplinary
12 Charges, Respondent realleges and incorporates her responses to the
13 allegations stated in Counts Ninety-Five through Ninety-Six.

14 501. Responding to Paragraph 501 of the Notice of Disciplinary Charges,
15 Respondent denies the allegations stated in that Paragraph.

16 502. Responding to Paragraph 502 of the Notice of Disciplinary Charges,
17 Respondent denies the allegations stated in that Paragraph.

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19 **COUNT NINETY-EIGHT**

20 503. Responding to Paragraph 503 of the Notice of Disciplinary Charges,
21 Respondent denies the allegations stated in that Paragraph.

22 504. Responding to Paragraph 504 of the Notice of Disciplinary
23 Charges, Respondent realleges and incorporates her responses to the
24 allegations stated in Counts Ninety-Five through Ninety-Seven.

25 505. Responding to Paragraph 505 of the Notice of Disciplinary Charges,
26 Respondent denies the assumptions and allegations stated in that Paragraph.

27 506. Responding to Paragraph 506 of the Notice of Disciplinary Charges,
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1 Respondent denies the assumptions and allegations stated in that Paragraph.

2 **COUNT NINETY-NINE**

3 507. Responding to Paragraph 507 of the Notice of Disciplinary Charges,
4 Respondent denies the allegations stated in that Paragraph.

5 508. Responding to Paragraph 508 of the Notice of Disciplinary
6 Charges, Respondent realleges and incorporates her responses to the
7 allegations stated in Paragraphs 2 through 4, and 7 through 8.

8 509. Responding to Paragraph 509 of the Notice of Disciplinary Charges,
9 Respondent denies the allegations stated in that Paragraph.

10 510. Responding to Paragraph 510 of the Notice of Disciplinary Charges,
11 Respondent denies the allegations stated in that Paragraph.

12 511. Responding to Paragraph 511 of the Notice of Disciplinary Charges,
13 Respondent denies the allegations stated in that Paragraph.

14 512. Responding to Paragraph 512 of the Notice of Disciplinary Charges,
15 Respondent denies the allegations stated in that Paragraph.

16 513. Responding to Paragraph 513 of the Notice of Disciplinary Charges,
17 Respondent denies the allegations stated in that Paragraph.

18 **COUNT ONE HUNDRED**

19 514. Responding to Paragraph 514 of the Notice of Disciplinary Charges,
20 Respondent denies the allegations stated in that Paragraph.

21 515. Responding to Paragraph 515 of the Notice of Disciplinary
22 Charges, Respondent realleges and incorporates her responses to the
23 allegations stated in Count Ninety-Nine.

24 516. Responding to Paragraph 516 of the Notice of Disciplinary Charges,
25 Respondent denies the allegations stated in that Paragraph.

1 546. Responding to Paragraph 546 of the Notice of Disciplinary
2 Charges, Respondent realleges and incorporates her responses to the
3 allegations stated in Paragraphs 2 through 4, and Counts One through One
4 Hundred and Six.

5 547. Responding to Paragraph 547 of the Notice of Disciplinary Charges,
6 Respondent denies the assumptions and allegations stated in that Paragraph.
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8 548. Responding to Paragraph 548 of the Notice of Disciplinary Charges,
9 Respondent denies the assumptions and allegations stated in that Paragraph.

10 549. Responding to Paragraph 549 of the Notice of Disciplinary Charges,
11 Respondent denies the assumptions and allegations stated in that Paragraph.

12 550. Responding to Paragraph 550 of the Notice of Disciplinary Charges,
13 Respondent denies the assumptions and allegations stated in that Paragraph.

14 551. Responding to Paragraph 551 of the Notice of Disciplinary Charges,
15 Respondent denies the assumptions and allegations stated in that Paragraph.
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17 552. Responding to Paragraph 552 of the Notice of Disciplinary Charges,
18 Respondent denies the assumptions and allegations stated in that Paragraph.

19 **COUNT ONE HUNDRED AND EIGHT**

20 553. Responding to Paragraph 553 of the Notice of Disciplinary Charges,
21 Respondent denies the assumptions and allegations stated in that Paragraph.

22 554. Responding to Paragraph 554 of the Notice of Disciplinary
23 Charges, Respondent realleges and incorporates her responses to the
24 allegations stated in Paragraphs 2 through 4, and Counts One through One
25 Hundred and Seven.
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555. Responding to Paragraph 555 of the Notice of Disciplinary Charges,
Respondent denies the assumptions and allegations stated in that Paragraph.

MARGOLIS & MARGOLIS LLP

September 2, 2013

By: *Arthur L. Margolis*
ARTHUR L. MARGOLIS
Counsel for Respondent

1
2 **PROOF OF SERVICE**
3 **BY PERSONAL DELIVERY**

4 STATE OF CALIFORNIA)
5) ss.
6 COUNTY OF LOS ANGELES)

7
8 **Case No. 12-0-13126, et al**

9 I am employed in the County of Los Angeles, State of California. I am
10 over the age of eighteen (18) years and am not a party to the within action.
11 My business address is: 2000 Riverside Drive, Los Angeles, California 90039-
12 3758.

13 On September 4, 2013, I served the foregoing document described as:
14 RESPONSE TO NOTICE OF DISCIPLINARY CHARGE on the State Bar of
15 California, by placing a true copy thereof, enclosed in a sealed envelope,
16 addressed as follows:

17 Christine Souhrada
18 Deputy Trial Counsel
19 THE STATE BAR OF CALIFORNIA
20 1149 South Hill Street
Los Angeles, CA 90015-2299

21 **I DELIVERED SUCH ENVELOPE BY HAND TO THE OFFICE OF THE**
22 **ADDRESSEE.**

23 I declare under penalty of perjury under the laws of the State of
24 California that the foregoing is true and correct.

25 Executed this 4th day of September, 2013 at Los Angeles, California.

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