

1 CHANCE E. GORDON (SBN 198512)  
2 **PREMIER LAW CENTER**  
3 121 W. Lexington Drive, Suite 214  
4 Glendale, CA 91203  
5 Tel. (888) 645-4579  
6 Bydand71@gmail.com

**FILED**

**JAN 31 2013**  
STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

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

11 In the Matter of

12 CHANCE EDWARD GORDON

14 Member No. 198512

15 A Member of the State Bar.

**CASE NO. 12-0-14013**

**RESPONSE TO NOTICE OF  
DISCIPLINARY CHARGES**



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18 **RESPONSE TO DISCIPLINARY CHARGES**

19 **JURISDICTION**

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21 1. Responding to Paragraph 1 of the Notice of Disciplinary Charges, Respondent  
22 admits the allegations contained in that paragraph.

23 **COUNT 1**

24 2. Responding to Paragraph 2 of the Notice of Disciplinary Charges, Respondent  
25 denies the allegations contained in that paragraph.

26 3. Responding to Paragraph 3 of the Notice of Disciplinary Charges, Respondent  
27

1 denies the allegations contained in that paragraph.

2 4. Responding to Paragraph 4 of the Notice of Disciplinary Charges, Respondent  
3 denies the allegations contained in that paragraph.

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

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

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10 **COUNT 2**

11 7. Responding to Paragraph 7 of the Notice of Disciplinary Charges, Respondent  
12 denies the allegations contained in that paragraph.

13 8. Responding to Paragraph 8 of the Notice of Disciplinary Charges, Respondent  
14 denies the allegations contained in that paragraph.

15 9. Responding to Paragraph 9 of the Notice of Disciplinary Charges, Respondent  
16 denies the allegations contained in that paragraph.

17 10. Responding to Paragraph 10 of the Notice of Disciplinary Charges, Respondent  
18 denies the allegations contained in that paragraph.

19 11. Responding to Paragraph 11 of the Notice of Disciplinary Charges, Respondent  
20 denies the allegations contained in that paragraph.

21 12. Responding to Paragraph 12 of the Notice of Disciplinary Charges, Respondent  
22 denies the allegations contained in that paragraph.

23 13. Responding to Paragraph 13 of the Notice of Disciplinary Charges, Respondent  
24 denies the allegations contained in that paragraph.



1 denies the allegations contained in that paragraph.

2 26. Responding to Paragraph 26 of the Notice of Disciplinary Charges, Respondent  
3 denies the allegations contained in that paragraph.

4 27. Responding to Paragraph 27 of the Notice of Disciplinary Charges, Respondent  
5 denies the allegations contained in that paragraph.

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7 **COUNT 3**

8 28. Responding to Paragraph 28 of the Notice of Disciplinary Charges, Respondent  
9 denies the allegations contained in that paragraph.

10 29. Responding to Paragraph 29 of the Notice of Disciplinary Charges, Respondent  
11 denies the allegations contained in that paragraph.

12 30. Responding to Paragraph 30 of the Notice of Disciplinary Charges, Respondent  
13 denies the allegations contained in that paragraph.

14 31. Responding to Paragraph 31 of the Notice of Disciplinary Charges, Respondent  
15 denies the allegations contained in that paragraph.

16 32. Responding to Paragraph 32 of the Notice of Disciplinary Charges, Respondent  
17 admits the allegations contained in that paragraph.

18 33. Responding to Paragraph 33 of the Notice of Disciplinary Charges, Respondent  
19 denies the allegations contained in that paragraph.

20 34. Responding to Paragraph 34 of the Notice of Disciplinary Charges, Respondent  
21 denies the allegations contained in that paragraph.

22 35. Responding to Paragraph 35 of the Notice of Disciplinary Charges, Respondent  
23 denies the allegations contained in that paragraph.

24 36. Responding to Paragraph 36 of the Notice of Disciplinary Charges, Respondent  
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1 denies the allegations contained in that paragraph.

2 47. Responding to Paragraph 47 of the Notice of Disciplinary Charges, Respondent  
3 denies the allegations contained in that paragraph.  
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5 **COUNT 6**

6 48. Responding to Paragraph 48 of the Notice of Disciplinary Charges, Respondent  
7 denies the allegations contained in that paragraph.  
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9 49. Responding to Paragraph 49 of the Notice of Disciplinary Charges, Respondent  
10 denies the allegations contained in that paragraph.

11 50. Responding to Paragraph 50 of the Notice of Disciplinary Charges, Respondent  
12 denies the allegations contained in that paragraph.

13 51. Responding to Paragraph 51 of the Notice of Disciplinary Charges, Respondent  
14 denies the allegations contained in that paragraph.

15 52. Responding to Paragraph 52 of the Notice of Disciplinary Charges, Respondent  
16 denies the allegations contained in that paragraph.  
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18 **COUNT 7**

19 53. Responding to Paragraph 53 of the Notice of Disciplinary Charges, Respondent  
20 denies the allegations contained in that paragraph.  
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22 54. Responding to Paragraph 54 of the Notice of Disciplinary Charges, Respondent  
23 denies the allegations contained in that paragraph.

24 55. Responding to Paragraph 55 of the Notice of Disciplinary Charges, Respondent  
25 denies the allegations contained in that paragraph.

26 56. Responding to Paragraph 56 of the Notice of Disciplinary Charges, Respondent  
27

1 denies the allegations contained in that paragraph.

2 57. Responding to Paragraph 57 of the Notice of Disciplinary Charges, Respondent  
3 denies the allegations contained in that paragraph.  
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5 **COUNT 8**

6 58. Responding to Paragraph 58 of the Notice of Disciplinary Charges, Respondent  
7 denies the allegations contained in that paragraph.  
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9 59. Responding to Paragraph 59 of the Notice of Disciplinary Charges, Respondent  
10 denies the allegations contained in that paragraph.

11 60. Responding to Paragraph 60 of the Notice of Disciplinary Charges, Respondent  
12 denies the allegations contained in that paragraph.

13 61. Responding to Paragraph 61 of the Notice of Disciplinary Charges, Respondent  
14 denies the allegations contained in that paragraph.

15 62. Responding to Paragraph 62 of the Notice of Disciplinary Charges, Respondent  
16 denies the allegations contained in that paragraph.  
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18 63. Responding to Paragraph 63 of the Notice of Disciplinary Charges, Respondent  
19 denies the allegations contained in that paragraph.

20 **COUNT 9**

21 64. Responding to Paragraph 64 of the Notice of Disciplinary Charges, Respondent  
22 denies the allegations contained in that paragraph.  
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24 65. Responding to Paragraph 65 of the Notice of Disciplinary Charges, Respondent  
25 denies the allegations contained in that paragraph.

26 66. Responding to Paragraph 66 of the Notice of Disciplinary Charges, Respondent  
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**COUNT 11**

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

89. Responding to Paragraph 89 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

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

**COUNT 12**

91. Responding to Paragraph 91 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

92. Responding to Paragraph 92 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

93. Responding to Paragraph 93 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

**COUNT 13**

94. Responding to Paragraph 94 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

95. Responding to Paragraph 95 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

96. Responding to Paragraph 96 of the Notice of Disciplinary Charges, Respondent denies the allegations contained in that paragraph.

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2 **COUNT 14**

3 97. Responding to Paragraph 97 of the Notice of Disciplinary Charges, Respondent  
4 denies the allegations contained in that paragraph.

5 98. Responding to Paragraph 98 of the Notice of Disciplinary Charges, Respondent  
6 denies the allegations contained in that paragraph.

7 99. Responding to Paragraph 99 of the Notice of Disciplinary Charges, Respondent  
8 denies the allegations contained in that paragraph.

9 100. Responding to Paragraph 100 of the Notice of Disciplinary Charges, Respondent  
10 denies the allegations contained in that paragraph.

11 101. Responding to Paragraph 101 of the Notice of Disciplinary Charges, Respondent  
12 denies the allegations contained in that paragraph.

13 102. Responding to Paragraph 102 of the Notice of Disciplinary Charges, Respondent  
14 denies the allegations contained in that paragraph.

15 103. Responding to Paragraph 103 of the Notice of Disciplinary Charges, Respondent  
16 denies the allegations contained in that paragraph.

17 104. Responding to Paragraph 104 of the Notice of Disciplinary Charges, Respondent  
18 denies the allegations contained in that paragraph.

19 105. Responding to Paragraph 105 of the Notice of Disciplinary Charges, Respondent  
20 denies the allegations contained in that paragraph.

21 **COUNT 15**

22 106. Responding to Paragraph 106 of the Notice of Disciplinary Charges, Respondent  
23 denies the allegations contained in that paragraph.  
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1 Dated: January 31, 2012

2 Member Chance E. Gordon

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1 **PROOF OF SERVICE**

2 I am a resident of Los Angeles. I am over the age of eighteen years and ~~an~~<sup>cc</sup> party to the within  
3 action; my business address is 121 W. Lexington Drive, Suite 214, Glendale, CA 91203.

4 On January 31, 2013, I served the Response to Notice of Disciplinary Charges on the interested  
5 parties in this action as follows:

6 **Erin McKeown-Joyce, Esq**  
7 **THE STATE BAR OF CALIFORNIA**  
8 **1149 South Hill Street, 4<sup>th</sup> Floor**  
9 **Los Angeles, CA 90015**

10        (BY MAIL) The envelope was mailed with postage thereon fully prepaid. I am "readily" familiar  
11 with the firm's practice of collection and processing correspondence for mailing. It is deposited  
12 with U.S. Postal Service on that same day in the ordinary course of business. I am aware that on  
13 motion of a party served, service is presumed invalid if the postal cancellation date or postage  
14 meter date is more than one day after date of deposit for mailing an affidavit.

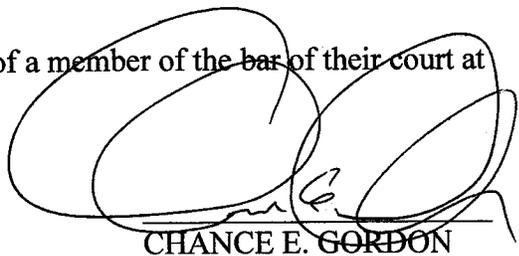
15 XX (BY PERSONAL SERVICE) I delivered such envelope by hand to the office of the addressee.

16        Via Email to the addresses listed above.

17 XX (STATE) I declare under penalty of perjury under the laws of the State of California that the  
18 above is true and correct.

19        (FEDERAL) I declare that I am employed in the office of a member of the bar of their court at  
20 whose direction the service was made.

21 1/31/2013  
22 DATE

23   
24 CHANCE E. GORDON  
25