

FILED *Rz*

JUL 01 2013

Filed Per Order of Judge

**STATE BAR COURT CLERK'S OFFICE
SAN FRANCISCO**

**LARRY A. DONALDSON SBN 65658
6091 N. Poplar Unit G
Fresno CA 93704
Telephone: (559) 907-3389
Fax(559)438-6105**

STATE BAR COURT

HEARING DEPARTMENT-SAN FRANCISCO

In the Matter of:) Case No. 12-0-14411
)
LARRY ALVIN DONALDSON SBN 65658) VERIFIED ANSWER TO NOTICE OF
) DISCIPLINARY CHARGES
)
)
<u>A Member of the State Bar</u>)

COMES NOW LARRY A. DONALDSON and answers the allegation in the Notice of Disciplinary Charges as follows:

JURSDICTION

1. Answering paragraph 1. Admit the allegations therein.

COUNT ONE

**Case No. 12-0-14411
Business and Professions Code, section 6068(a)
[Failure to Comply With Laws]**

2. Answering paragraph 2. admits that there was a failure to comply with state law. Otherwise denies each and every allegation contained therein and



1 specifically deny that there was a failure to support the Constitution and law of
2 the United States.

- 3 3. Answering paragraph 3. admits the allegations contained therein.
4
5 4. Answering paragraph 4. admits the allegations contained therein.
6
7 5. Answering paragraph 5. admits the allegations contained therein.
8
9 6. Answering paragraph 6. admits that Laura Leonard requested accountings
10 from Respondent otherwise denies that the request beginning in or about
11 2008.
12
13 7. Answering paragraph 7. admits the allegation contained therein.
14
15 8. Answering paragraph 8. admits the allegations contained therein.
16
17 9. Answering paragraph 9. admits the allegation contained therein.
18
19 10. Answering paragraph 10. admits the allegation contained therein.

20
21
22
23
24
25
26
27
28

COUNT TWO

Case No. 12-0-14411
Business and Professions Code, section 6068(a)
[Failure to Comply With Laws]

11. Answering paragraph 11. admits that there was a failure to comply with state
law. Otherwise denies each and every allegation contained therein and
specifically deny that there was a failure to support the Constitution and law of
the United States.
12. The answers to Count One in paragraphs 2 through 10 are incorporated by
reference as if fully set forth herein.
13. Answering paragraph 13. admits the allegations contained therein.

1 14. Answering paragraph 14. admits the allegations contained therein.

2 15. Answering paragraph 15. admits the allegations contained therein.

3 16. Answering paragraph 16. admits the allegations contained therein.

4 17. Answering paragraph 17. admits the allegations contained therein.

5 18. Answering paragraph 18. denies the allegation contained therein.

6 19. Answering paragraph 19. admits the allegation contained therein.

7
8
9
10 **COUNT THREE**

11 **Case No. 12-0-14411**
12 **Business and Professional Code, section 6106**
13 **[Moral Turpitude]**

14 20. Answering paragraph 20. denies specifically and generally each and every
15 allegation contended therein.

16 21. The answers to Count One and Two in paragraphs 2 through 19 are
17 incorporated by reference as if fully set forth herein.

18 22. Answering paragraph 22. denies specifically and generally each and every
19 allegation contained therein.

20
21
22 **FIRST AFFIRMATIVE DEFENSE**

23 The acts alleged in the Notice of Disciplinary Charges do not constitute
24 moral turpitude to constitute a violation of Business and Professional Code
25 section 6106.

26
27
28 **SECOND AFFIRMITIVE DEFENSE**

1 An Inventory and Appraisal was filed in the Estate of Paul Harvey Wallace on
2 June 24, 2013 in Fresno Superior Court Number 08 CE PR 00294.
3

4
5 **VERIFICATION**

6 I Larry A. Donaldson hereby declare under penalty of perjury under the laws of
7 the State of California that the foregoing is true and correct and if called to testify could
8 testify competently thereto.
9

10
11 Executed this 27th day of June at Fresno, California
12

13
14 
15 Larry A. Donaldson
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF FRESNO

I am employed in the County of Fresno, State of California. I am over the age of 18; my business address is 6091 N. Poplar Unit G, Fresno, CA 93704.

On June 27, 2013, I served the document described as **Verified Answer to of Disciplinary Charges** the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Via U.S. Mail
State Bar of California
Senior Trial Counsel
Sherrie B. McLetchie
180 Howerd Street
San Francisco, CA 94105-1639

+

BY MAIL X I deposited such envelope in the mail at Fresno, California. The envelope was mailed with postage thereon fully prepaid.

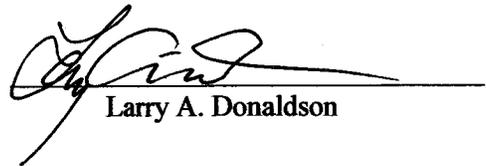
(BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the addressee.

(BY FAX) I caused the above-referenced document to be transmitted by fax to the addressee(s) at the fax number(s) shown.

(BY OVERNIGHT COURIER) I caused the above-referenced envelope(s) to be delivered to an overnight courier service for delivery to the addressee(s).

Executed on June 27, 2013 at Fresno, California.

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


Larry A. Donaldson