

1 ELLEN R. PECK, ESQ. (STATE BAR NO. 88252)
2 2410 CRESTVIEW ESTATES PLACE
3 ESCONDIDO, CALIFORNIA 92027
4 Telephone: 760-480-2233
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6 Attorney for Respondent, Rodney Kent Worrel

FILED

FEB 28 2013

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

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8
9 THE STATE BAR COURT
10 OF THE STATE BAR OF CALIFORNIA
11 HEARING DEPARTMENT – LOS ANGELES
12

13 In the Matter of

14
15 RODNEY KENT WORREL,
16 No. 51857,

17 A Member of the State Bar of California.
18
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Case Nos. 12-O-16562-LMA

RESPONSE TO NOTICE OF
DISCIPLINARY CHARGES

20 Respondent, Rodney Kent Worrel responds to the allegations set forth in the Notice
21 of Disciplinary Charges (“Notice”) on file herein, by admitting denying and alleging as
22 follows:

23 The name and address of Respondent’s counsel of record is:

24
25 ELLEN R. PECK, ESQ.
26 2410 CRESTVIEW ESTATES PLACE
27 ESCONDIDO, CALIFORNIA 92027
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1 All further pleadings in this matter should be directed to Respondent's counsel at this
2 address.

3 1. Respondent **admits** to the truth of all of the allegations set forth in paragraph 1
4 of the Notice, except that he was admitted in 1972 not 1072.

5 **COUNT ONE**

6 2. In response to the allegations contained in paragraph 2 of the Notice,
7 Respondent denies that he willfully violated rule 3-110(A), California Rules of Professional
8 Conduct.

9 3. Respondent denies the allegations contained in paragraph 3 of the Notice.

10 4. Respondent denies the allegations contained in paragraph 4 of the Notice.

11 5. Respondent denies the allegations contained in paragraph 5 of the Notice.

12 6. Respondent denies the allegations contained in paragraph 6 of the Notice.

13 7. Respondent denies the allegations contained in paragraph 7 of the Notice.

14 8. Respondent denies the allegations contained in paragraph 8 of the Notice.

15 9. Respondent denies the allegations contained in paragraph 9 of the Notice.

16 10. Respondent denies the allegations contained in paragraph 10 of the Notice.

17 **COUNT TWO**

18 11. Respondent denies the allegations contained in paragraph 11 of the Notice.

19 12. Respondent denies the allegations contained in paragraph 12 of the Notice.

20 13. Respondent denies the allegations contained in paragraph 13 of the Notice.

21 14. Respondent denies the allegations contained in paragraph 14 of the Notice.

22 15. Respondent denies the allegations contained in paragraph 15 of the Notice.

23 16. Respondent denies the allegations contained in paragraph 16 of the Notice.

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25 **COUNT THREE**

26 17. Respondent denies the allegations contained in paragraph 17 of the Notice.

27 18. Respondent denies the allegations contained in paragraph 18 of the Notice.

28 19. Respondent denies the allegations contained in paragraph 19 of the Notice.

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20. Respondent denies the allegations contained in paragraph 20 of the Notice.

21. Respondent denies the allegations contained in paragraph 21 of the Notice.

COUNT FOUR

22. Respondent denies the allegations contained in paragraph 22 of the Notice.

23. Respondent denies the allegations contained in paragraph 23 of the Notice.

24. Respondent denies the allegations contained in paragraph 24 of the Notice.

25. Respondent denies the allegations contained in paragraph 25 of the Notice.

26. Respondent denies the allegations contained in paragraph 26 of the Notice.

27. Respondent denies the allegations contained in paragraph 27 of the Notice.

DATED: February 27, 2013

Respectfully submitted,



Ellen R. Peck, Attorney for Respondent,
Rodney Kent Worrel, Esq.

DECLARATION OF SERVICE BY CERTIFIED MAIL

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Case Nos. 12-O-16562

I, the undersigned, am over the age of eighteen (18) years, my business address and place of employment is the Law Office of Ellen R. Peck, 2410 Crestview Estates Place, Escondido, California 92027, and declare that I am not a party to the within action; that I am readily familiar with my office's practices for collection and processing of pleadings and correspondence for mailing with the United States Postal Service; that in the ordinary course of my practice, pleadings and correspondence collected and processed by the Law Office of Ellen R. Peck would be deposited with the United States Postal Service that same day; that I am aware that on motion of a party service, service is presumed invalid if postal cancellation date or postage meter date on the envelope or package is more than one day after date of deposit for mailing contained in the affidavit; and that in accordance with the practice of the Law Office of Ellen R. Peck for collection and processing of mail, I deposited or placed for collection and mailing within the City of Escondido, County of San Diego, on the date shown below, a true and correct copy of the within

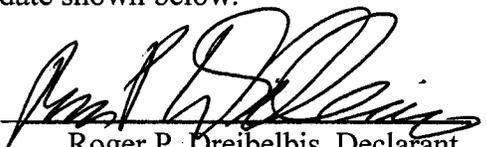
RESPONSE TO NOTICE OF DISCIPLINARY CHARGES

in a sealed envelope placed for collection and mailing at Escondido, California on the date shown below, addressed to:

Jayne Kim, Chief Trial Counsel
Joseph R. Carlucci, Depty. Chief Trial Counsel
Susan I. Kagan, Asst. Chief Trial Counsel
Susan Chan, Senior Trial Counsel
Suzan J. Anderson, Senior Trial Counsel
State Bar of California
180 Howard Street
San Francisco, California 94105-2209

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Escondido, California, on the date shown below.

Dated: 2-27-13

SIGNED: 
Roger P. Dreibelbis, Declarant