

**FILED**

**JUL 17 2013**

**STATE BAR COURT  
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LOS ANGELES**

1 **CENTURY LAW GROUP LLP**  
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3 Los Angeles, California 90045  
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5 Attorneys for Respondent  
6 Steven Gregory Kaplan

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9 **STATE BAR COURT**  
10 **HEARING DEPARTMENT – LOS ANGELES**

11 In the Matter of

) Case No.: 12-O-17912

12  
13 STEVEN GREGORY KAPLAN,  
No. 137381,

) **RESPONDENT STEVEN GREGORY  
KAPLAN'S ANSWER TO THE NOTICE OF  
DISCIPLINARY CHARGES**

14  
15 A Member of the State Bar.  
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18  
19 TO: THE STATE BAR COURT OF CALIFORNIA

20 Pursuant to Rule 103 of the Rules of Procedure of the State Bar of California, Respondent  
21 Steven Gregory Kaplan, by and through his attorney of record, Edward O. Lear, hereby submits the  
22 following in response to the Notice of Disciplinary Charges on file herein:

23 Respondent Steven Gregory Kaplan was admitted to the practice of Law in the State of  
24 California on December 7, 1988, and at all relevant times herein, has been a member of the State Bar  
25 of California.

26 Under the provisions of Rules of Procedure of the State Bar of California, Respondent  
27 Steven Gregory Kaplan hereby generally denies each and every allegation of the Notice of  
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1 Disciplinary Charges and the whole thereof, and further denies that the Respondent has violated any  
2 Rule of Professional Conduct in any manner whatsoever.

3 In response to the specific allegations on information and belief set forth in the Notice of  
4 Disciplinary Charges on file herein, Respondent Steven Gregory Kaplan asserts:

5 1. In response to Paragraph 1 of the Notice of Disciplinary Charges, Respondent admits  
6 said allegations.

7 2. In response to Paragraph 2 of the Notice of Disciplinary Charges, Respondent denies  
8 said allegations.

9 3. In response to Paragraph 3 of the Notice of Disciplinary Charges, Respondent admits  
10 said allegations.

11 4. In response to Paragraph 4 of the Notice of Disciplinary Charges, Respondent admits  
12 said allegations.

13 5. In response to Paragraph 5 of the Notice of Disciplinary Charges, Respondent admits  
14 said allegations.

15 6. In response to Paragraph 6 of the Notice of Disciplinary Charges, Respondent denies  
16 said allegations.

17 7. In response to Paragraph 7 of the Notice of Disciplinary Charges, Respondent admits  
18 said allegations.

19 8. In response to Paragraph 8 of the Notice of Disciplinary Charges, Respondent admits  
20 said allegations.

21 9. In response to Paragraph 9 of the Notice of Disciplinary Charges, Respondent admits  
22 said allegations.

23 10. In response to Paragraph 10 of the Notice of Disciplinary Charges, Respondent  
24 admits said allegations.

25 11. In response to Paragraph 11 of the Notice of Disciplinary Charges, Respondent  
26 admits said allegations.

27 12. In response to Paragraph 12 of the Notice of Disciplinary Charges, Respondent  
28 admits said allegations.

1           13.    In response to Paragraph 13 of the Notice of Disciplinary Charges, Respondent  
2 admits said allegations.

3           14.    In response to Paragraph 14 of the Notice of Disciplinary Charges, Respondent  
4 denies said allegations.

5           15.    In response to Paragraph 15 of the Notice of Disciplinary Charges, the bank account  
6 speaks for itself.

7           16.    In response to Paragraph 16 of the Notice of Disciplinary Charges, Respondent  
8 denies said allegations.

9           17.    In response to Paragraph 17 of the Notice of Disciplinary Charges, Respondent  
10 denies said allegations.

11          18.    In response to Paragraph 18 of the Notice of Disciplinary Charges, Respondent  
12 denies said allegations.

13          19.    In response to Paragraph 19 of the Notice of Disciplinary Charges, Respondent  
14 incorporates by reference his responses to the allegations contained in Count One of the State Bar's  
15 Notice of Disciplinary Charges.

16          20.    In response to Paragraph 20 of the Notice of Disciplinary Charges, Respondent  
17 denies said allegations.

18          21.    In response to Paragraph 21 of the Notice of Disciplinary Charges, Respondent  
19 admits said allegations.

20          22.    In response to Paragraph 22 of the Notice of Disciplinary Charges, Respondent  
21 denies said allegations.

22          23.    In response to Paragraph 23 of the Notice of Disciplinary Charges, Respondent  
23 denies said allegations.

24          24.    In response to Paragraph 24 of the Notice of Disciplinary Charges, Respondent  
25 incorporates by reference his responses to the allegations contained in Count One and Two of the  
26 State Bar's Notice of Disciplinary Charges.

27          25.    In response to Paragraph 25 of the Notice of Disciplinary Charges, Respondent lacks  
28 sufficient information or belief to either admit or deny said allegation.

1           26.    In response to Paragraph 26 of the Notice of Disciplinary Charges, Respondent  
2 admits said allegations.

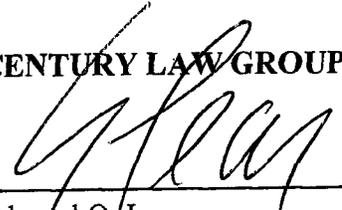
3           27.    In response to Paragraph 27 of the Notice of Disciplinary Charges, Respondent  
4 admits said allegations.

5           28.    In response to Paragraph 28 of the Notice of Disciplinary Charges, Respondent  
6 admits said allegations.

7           29.    In response to Paragraph 29 of the Notice of Disciplinary Charges, Respondent  
8 admits said allegations.

9           30.    In response to Paragraph 30 of the Notice of Disciplinary Charges, Respondent  
10 denies said allegations.

11  
12 DATED: July 17, 2013

**CENTURY LAW GROUP LLP**  
  
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Edward O. Lear  
Attorney for Respondent  
Steven Gregory Kaplan

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**DECLARATION OF SERVICE BY MAIL**

Re: In the Matter of Steven Gregory Kaplan

No.: 12-O-17912

I, Kathy Ferrera, declare:

I am over the age of 18 years and not a party to the within action. My business address is 5200 W. Century Boulevard, Suite 345, Los Angeles, California 90045, in the County of Los Angeles.

I am familiar with the business practice of Century Law Group LLP for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system is deposited with the United States Postal Service that same day in the ordinary course of business.

On July 17, 2013, at my place of business, at Los Angeles, California, the attached:

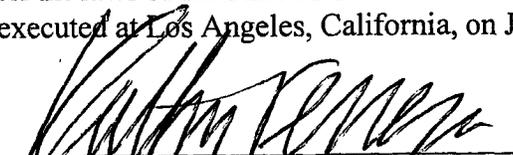
**RESPONDENT'S STEVEN GREGORY KAPLAN'S ANSWER TO THE NOTICE OF  
DISCIPLINARY CHARGES**

was placed for collection and deposit in the United States Postal Service at the practice of Century Law Group LLP, 5200 W. Century Boulevard, Suite 345, Los Angeles, California 90045, in a sealed envelope, postage fully prepaid, addressed to:

Ross Viselman Deputy Trial Counsel The State Bar of California 1149 S. Hill Street Los Angeles, CA 90015
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and that envelope was placed for mailing on that date following ordinary business practices.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and this declaration was executed at Los Angeles, California, on July 17, 2013.

  
Kathy Ferrera