

1 **JEFFREY STEVEN HOFFMAN (SBN #71240)**
2 530 S Glenoaks Blvd Ste 201
3 Burbank, CA 91502
4 (800) 756-5977
5 (800) 756-6561 facsimile

6 Respondent in pro per

FILED

SEP 12 2013

STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

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

10 In the Matter of:

) Case Nos.: 13-O-10222, 13-J-11060

11
12 **JEFFREY STEVEN HOFFMAN,**
13 **No. 71240**

) **ANSWER OF JEFFREY STEVEN HOFFMAN**
) **TO NOTICE OF DISCIPLINARY CHARGES**

14 A Member of the State Bar
15
16

17 TO: THE STATE BAR COURT OF CALIFORNIA

18 Pursuant to the applicable Rules of Procedure of the State Bar of California, member
19 Jeffrey Steven Hoffman, hereby submits the following response to the Notice of Disciplinary
20 Charges on file herein:
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22 Jeffrey Steven Hoffman, was admitted to the practice of Law in the State of California
23 on December 22, 1976, and at all relevant times herein, has been a member of the State Bar of
24 California.

25 Under the provisions of the applicable Rules of Procedure of the State Bar of California,
26 member Jeffrey Steven Hoffman hereby generally denies each and every allegation of the
27 Notice of Disciplinary Charges and the whole thereof, and further denies having willfully
28



1 violated any rule of the Rules of Professional Conduct in any manner whatsoever, and in
2 response to the specific allegations set forth in the Notice of Disciplinary Charges on file herein,
3 State Bar member, Jeffrey Steven Hoffman, asserts as follows:

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5 **AS TO JURISDICTION:**

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7 1. In response to paragraph 1 of Notice of Disciplinary Charges this respondent admits
8 that he was admitted to the practice of Law in the State of California on December 22, 1976.

9
10 **AS TO COUNT ONE: CASE NUMBER 13-O-10222**

11 1. In response to paragraph 1 of notice of disciplinary charges this Respondent denies
12 the allegation.

13 2. In response to paragraph 2 of notice of disciplinary charges, this Respondent lacks
14 sufficient information and/or belief to enable him to either admit or deny the allegation
15 contained in paragraph 2 of the notice of disciplinary charges on file and based on that lack of
16 information and belief this Respondent does hereby specifically deny said allegation.

17 3. In response to paragraph 3 of notice of disciplinary charges, this Respondent lacks
18 sufficient information and/or belief to enable him to either admit or deny the allegations
19 contained in paragraph 3 of the notice of disciplinary charges on file and based on that lack of
20 information and belief this Respondent does hereby specifically deny said allegations.

21 4. In response to paragraph 4 of notice of disciplinary charges this Respondent lacks
22 sufficient information and/or belief to enable him to either admit or deny the allegations
23 contained in paragraph 4 of the notice of disciplinary charges on file and based on that lack of
24 information and belief this Respondent does hereby specifically deny said allegations.
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1 5. In response to paragraph 5 of notice of disciplinary charges, this Respondent lacks
2 sufficient information and/or belief to enable him to either admit or deny the allegation
3 contained in paragraph 5 of the notice of disciplinary charges on file and based on that lack of
4 information and belief this Respondent does hereby specifically deny said allegation.

5 6. In response to paragraph 6 of notice of disciplinary charges this Respondent lacks
6 sufficient information and/or belief to enable him to either admit or deny the allegations
7 contained in paragraph 6 of the notice of disciplinary charges on file and based on that lack of
8 information and belief this Respondent does hereby specifically deny said allegations.

9 7. In response to paragraph 7 of notice of disciplinary charges this Respondent lacks
10 sufficient information and/or belief to enable him to either admit or deny the allegations
11 contained in paragraph 7 of the notice of disciplinary charges on file and based on that lack of
12 information and belief this Respondent does hereby specifically deny said allegations.
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14 8. In response to paragraph 8 of notice of disciplinary charges this Respondent lacks
15 sufficient information and/or belief to enable him to either admit or deny the allegations
16 contained in paragraph 8 of the notice of disciplinary charges on file and based on that lack of
17 information and belief this Respondent does hereby specifically deny said allegations.
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19 9. In response to paragraph 9 of notice of disciplinary charges this Respondent lacks
20 sufficient information and/or belief to enable him to either admit or deny the allegations
21 contained in paragraph 9 of the notice of disciplinary charges on file and based on that lack of
22 information and belief this Respondent does hereby specifically deny said allegations.
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24 10. In response to paragraph 10 of notice of disciplinary charges this Respondent lacks
25 sufficient information and/or belief to enable him to either admit or deny the allegations
26 contained in paragraph 10 of the notice of disciplinary charges on file and based on that lack of
27 information and belief this Respondent does hereby specifically deny said allegations.
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AS TO COUNT TWO: CASE NUMBER 13-O-10222

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2 11. In response to paragraph 11 of notice of disciplinary charges this Respondent denies
3 the allegation.

4 12. Except for those allegations in Count one of the notice of disciplinary charges that
5 are specifically admitted, this Respondent lacks sufficient information and/or belief to enable
6 him to admit or deny said allegations and based on that lack of information and belief
7 Respondent does hereby generally deny the allegations of Count one of the notice of
8 disciplinary charges on file.
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10 13. In response to paragraph 13 of notice of disciplinary charges this Respondent lacks
11 sufficient information and/or belief to enable him to either admit or deny the allegations
12 contained in paragraph 13 of the notice of disciplinary charges on file and based on that lack of
13 information and belief this Respondent does hereby specifically deny said allegations.
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15 14. In response to paragraph 14 of notice of disciplinary charges this Respondent lacks
16 sufficient information and/or belief to enable him to either admit or deny the allegations
17 contained in paragraph 14 of the notice of disciplinary charges on file and based on that lack of
18 information and belief this Respondent does hereby specifically deny said allegations.
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20 15. In response to paragraph 15 of notice of disciplinary charges this Respondent lacks
21 sufficient information and/or belief to enable him to either admit or deny the allegations
22 contained in paragraph 15 of the notice of disciplinary charges on file and based on that lack of
23 information and belief this Respondent does hereby specifically deny said allegations.
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25 16. In response to paragraph 16 of notice of disciplinary charges this Respondent lacks
26 sufficient information and/or belief to enable him to either admit or deny the allegations
27 contained in paragraph 16 of the notice of disciplinary charges on file and based on that lack of
28 information and belief this Respondent does hereby specifically deny said allegations.

1 17. In response to paragraph 17 of notice of disciplinary charges this Respondent denies
2 the allegation.

3 18. In response to paragraph 18 of notice of disciplinary charges this Respondent denies
4 the allegation.

5 **AS TO COUNT THREE: CASE NUMBER 13-J-11060**

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7 19. In response to paragraph 19 of notice of disciplinary charges this Respondent lacks
8 sufficient information and/or belief to enable him to either admit or deny the allegations
9 contained in paragraph 19 of the notice of disciplinary charges on file and based on that lack of
10 information and belief this Respondent does hereby specifically deny said allegations.

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12 20. In response to paragraph 20 of notice of disciplinary charges this Respondent lacks
13 sufficient information and/or belief to enable him to either admit or deny the allegations
14 contained in paragraph 20 of the notice of disciplinary charges on file and based on that lack of
15 information and belief this Respondent does hereby specifically deny said allegations.

16
17 21. In response to paragraph 21 of notice of disciplinary charges this Respondent lacks
18 sufficient information and/or belief to enable him to either admit or deny the allegations
19 contained in paragraph 21 of the notice of disciplinary charges on file and based on that lack of
20 information and belief this Respondent does hereby specifically deny said allegations.

21
22 22. In response to paragraph 22 of notice of disciplinary charges this Respondent lacks
23 sufficient information and/or belief to enable him to either admit or deny the allegations
24 contained in paragraph 22 of the notice of disciplinary charges on file and based on that lack of
25 information and belief this Respondent does hereby specifically deny said allegations.

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27 23. In response to paragraph 23 of notice of disciplinary charges this Respondent lacks
28 sufficient information and/or belief to enable him to either admit or deny the allegations

1 contained in paragraph 23 of the notice of disciplinary charges on file and based on that lack of
2 information and belief this Respondent does hereby specifically deny said allegations.

3 24. In response to paragraph 24 of notice of disciplinary charges this Respondent lacks
4 sufficient information and/or belief to enable him to either admit or deny the allegations
5 contained in paragraph 24 of the notice of disciplinary charges on file and based on that lack of
6 information and belief this Respondent does hereby specifically deny said allegations.
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8 25. Respondent generally and specifically denies the allegations contained in paragraph
9 25 of the notice of disciplinary charges on file.
10

11 **FIRST AFFIRMATIVE DEFENSE**

12 **The stipulation is void**

13
14 At the time Jeffrey Steven Hoffman entered into the *stipulation* he was hospitalized at a
15 skilled nursing facility where he had been administered a regimen of pain medications and other
16 drugs whereby the consent of Jeffrey Steven Hoffman to said stipulation was not a voluntary,
17 knowing, and intelligent act done with sufficient awareness of the relevant circumstances and
18 its likely consequences.
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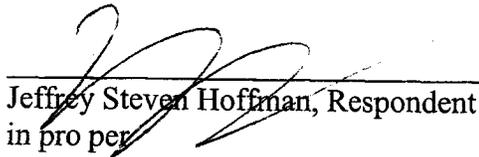
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21 **SECOND AFFIRMATIVE DEFENSE**

22 **Reservation of Right to Amend Answer**

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24 As for a further and separate affirmative defense to the Disciplinary Charges on file
25 herein and each and every count thereof, Jeffrey Steven Hoffman specifically reserves his rights
26 to amend this answer to assert additional affirmative defenses in the future and to supplement
27 those asserted herein upon completion of further investigation and discovery.
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Respectfully submitted this 11th day of September, 2013



Jeffrey Steven Hoffman, Respondent
in pro per

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DECLARATION OF SERVICE

In the matter of Jeffrey Steven Hoffman

Case numbers 13-O-10222, 13-J-11060

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles. I am over the age of eighteen and not a party to the within action.

On September 12, 2013, I caused to be served by personal service a true and correct copy of the following:

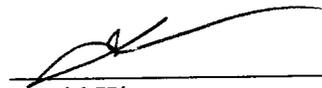
ANSWER OF JEFFREY STEVEN HOFFMAN TO NOTICE OF DISCIPLINARY CHARGES

as follows:

Jayne Kim Chief Trial Counsel
Joseph R. Carlucci Assistant Chief Trial Counsel
Melanie Lawrence Assistant Chief Trial Counsel
Ross Viselman Deputy Trial Counsel
STATE BAR OF CALIFORNIA
Office of the Chief Trial Counsel
Ernest L. DeSha, Deputy Trial Counsel
1149 South Hill Street
Los Angeles, CA 90015-2299

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

Dated: September 12, 2013



David Kim