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STATE BAR COURT
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5 **STATE BAR COURT**
6 **HEARING DEPARTMENT – LOS ANGELES**

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9 In the Matter of:
10 BRUCE HOWARD HAGLUND,
11 No. 92683
12 A Member of the State Bar

Case No. 13-O-12005

ANSWER TO NOTICE OF
DISCIPLINARY CHARGES



15 BRUCE H. HAGLUND (“Respondent”) admits, alleges, answers, and denies the
16 allegations of the State Bar of California as follows:

17 JURISDICTION

18 1. In answer to ¶ 1, Respondent admits the allegations of ¶ 1.

19 COUNT ONE

20 Case No. 13-O-12005

21 Business and Professions Code Section 6068(a)

22 [Failure to Company With Laws]

23 2. In answer to ¶ 2, Respondent denies each of the allegations of ¶ 2.

24 3. In answer to ¶ 3, Respondent denies each of the allegations of ¶ 3.

25 4. In answer to ¶ 4, Respondent admits that the investment contract was a
26 security, but denies each of the remaining allegations of ¶ 4.

27 5. In answer to ¶ 5, Respondent lacks sufficient information and belief to admit
28 or deny the allegations relating to the material misrepresentations made by Frank

1 Wilde (“Wilde”) and Mark Gelazela (“Gelazela”) to David Goldberg (“Goldberg”)
2 contained in ¶ 5, and Respondent denies each of the other allegations of ¶ 5.
3 6. In answer to ¶ 6, Respondent denies each of the allegations of ¶ 6.
4 7. In answer to ¶ 7, Respondent denies each of the allegations of ¶ 7.
5 8. In answer to ¶ 8, Respondent admits that Goldberg wired \$300,000 to
6 Respondent’s client trust account (“CTA”); however, Respondent lacks sufficient
7 information and belief to admit or deny the allegations relating to the representations
8 made by Wilde and Gelazela to Goldberg contained in ¶ 8, and other than as
9 expressly admitted herein, Respondent denies each and every other allegations
10 of ¶ 8.
11 9. In answer to ¶ 9, Respondent denies each of the allegations of ¶ 9.
12 10. In answer to ¶ 10, Respondent denies each of the allegations of ¶ 10.
13 11. In answer to ¶ 11, Respondent admits that monies were (i) wired to Wilde,
14 Gelazela, and others as directed by Wilde, a portion of which was to purchase a
15 bank guarantee, and (ii) transferred to himself; however, other than as expressly
16 admitted herein, Respondent denies each and every other allegation of ¶ 11.
17 12. In answer to ¶ 12, Respondent lack sufficient information to admit or deny
18 what Wilde represented to investors, including Goldberg, and therefore denies each
19 of the allegations of ¶ 12.
20 13. In answer to ¶ 13, Respondent denies each of the allegations of ¶ 13.

21 COUNT TWO

22 Case No. 13-O-12005

23 Business and Professions Code Section 6106

24 [Moral Turpitude - Misappropriation]

25 14. In answer to ¶ 14, Respondent (i) admits that Goldberg wired \$300,000 to
26 Respondent’s CTA, (ii) admits that Respondent wired and transferred substantially
27 all of the Goldberg funds as directed by Wilde to Wilde, Gelazela, and others,
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1 including for the purchase of a bank guarantee, and (iii) other than as expressly
2 admitted herein, Respondent denies each and every other allegation of ¶ 14.

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COUNT THREE

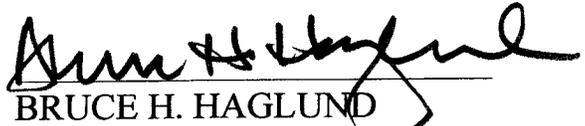
Case No. 13-O-12005

Business and Professions Code Section 6106

[Moral Turpitude – Scheme to Defraud]

15. In answer to ¶ 15, Respondent (i) admits that Goldberg wired \$300,000 to
Respondent's CTA, (ii) admits that Respondent wired and transferred substantially
all of the Goldberg funds as directed by Wilde to Wilde, Gelazela, himself, and
others, including for the purchase of a bank guarantee, and (iii) other than as
expressly admitted herein, Respondent denies each and every other allegation
of ¶ 15.

DATED: August 28, 2014


BRUCE H. HAGLUND

