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Thomas J. Bayard, Esq.
20651 Golden Springs Dr. # 240
Diamond Bar, CA 91789
909-860-0900
In Pro-Per

FILED

NOV 17 2014

STATE BAR COURT CLERK'S OFFICE
SAN FRANCISCO

STATE BAR COURT
HEARING DEPARTMENT - LOS ANGELES

IN THE MATTER OF THOMAS JAMES
BAYARD,
NO. 226247

) Case No.'s : 13-0-14012; 14-0-1001;
13-0-14747

A Member of the State Bar

) RESPONDENT'S ANSWER TO NOTICE OF
DISCIPLINARY CHARGES

RECEIVED

NOV 17 2014

STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

Thomas J. Bayard, the Respondent, answers the allegations of the Notice of Disciplinary

Charges dated October 27, 2014 as follows:



1 paragraph 6 of the Notice of Disciplinary Charges.

2 **Count Six**

3 (Failure to Comply With Laws - Unauthorized Practice of Law)

4
5 7. Respondent denies each and all, generally and specifically, of the allegations of
6 paragraph 7 of the Notice of Disciplinary Charges.

7 **Count Seven**

8 (Moral Turpitude)

9
10 8. Respondent denies each and all, generally and specifically, of the allegations of
11 paragraph 8 of the Notice of Disciplinary Charges.

12
13 **First Affirmative Defense**

14
15 9. With respect to all allegations of failure to pay, Respondent would assert an
16 inability to pay, rather than an intentional failure.

17 **Second Affirmative Defense - Abatement**

18
19 10. As to all matters concerning Aureila Alexandra Villa, Respondent denies the
20 charges and allegations Ms. Villa has made. Respondent further alleges that all these
21 allegations are currently at issue in a civil matter filed by Ms. Villa against Respondent in
22 the Los Angeles Superior Court, Case No. BC 542923. Respondent further asserts that
23 Ms. Villa, and her civil attorney, have sought to utilize the State Bar complaint process
24 for financial gain in the pending civil matter. Respondent further therefore asserts that
25 this proceeding should be stayed/abated pending resolution of the civil matter.
26

1 **Third Affirmative Defense**

2 (Applicable to All Counts)

3
4 11. Respondent reserves the right to assert additional Affirmative Defenses as the
5 prosecutions cases and theories become clear and as further preparation, investigation and
6 discovery may reveal same.

7 DATED: November 17, 2014

8
9 By;

10 
11 Thomas J. Bayard, Esq.

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the county of Los Angeles, state of California. I am over the age
4 of 18 and not a party to the within action; my business address is 20651 Golden Springs
5 Dr. # 240, Diamond Bar, CA

6 On November 17, 2014, I served the foregoing documents described as
7 RESPONDENT'S ANSWER TO NOTICE OF DISCIPLINARY CHARGES

8 on the interested parties in this action by placing a true and correct copy thereof in a
9 sealed envelope with postage thereon fully prepaid in the United States mail at Diamond
10 Bar, California, addressed as follows:

11 State Bar of California
12 Office of Chief Trial Counsel
13 Sue K. Hong, Deputy Trial Counsel

14 X (BY MAIL) I deposited such envelope in the mail at Diamond Bar, California. The
15 envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's
16 practice of collection and processing correspondence for mailing. It is deposited with the U. S.
17 postal service on the same day in the ordinary course of business. I am aware that on motion of
18 a party served, service is presumed invalid if postal cancellation date or postage meter date is
19 more than one day after date of deposit for mailing in affidavit.

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

22 (BY ELECTRONIC TRANSMISSION) I caused all of the pages of the above entitled
23 documents to be sent to the recipients noted above via electronic transfer (FAX) at the respective
24 telephone numbers indicated above.

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

27 X I declare that I am employed in the office of a member of the bar of this court at whose
28 direction this service was made.

Executed on November 17, 2014 at Diamond Bar, California.

