

**FILED**

**JUN 25 2015**

VICTOR R. CANNON, No. 159841  
1238 Berkeley Drive  
Glendale, CA 91205  
Telephone: (213) 760-1400

Respondent

STATE BAR COURT CLERK'S OFFICE  
SAN FRANCISCO

**THE STATE BAR COURT  
HEARING DEPARTMENT - SAN FRANCISCO**

<p><b>In the Matter of</b></p> <p><b>VICTOR R. CANNON, Respondent,</b></p> <p><b>No. 159841,</b></p> <p><b>A Member of the State Bar</b></p>	<p>)</p>	<p><b>Case No.: 14-H-06099</b></p> <p><b>RESPONDENT'S VERIFIED ANSWER TO NOTICE OF DISCIPLINARY CHARGES</b></p>
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TO THE HONORABLE PATRICE E. McELROY, JUDGE OF THE STATE BAR COURT OF THE STATE BAR OF CALIFORNIA, AND TO THE OFFICE OF THE CHIEF TRIAL COUNSEL OF THE STATE BAR OF CALIFORNIA:

Pursuant to Rule 5.43 of the Rules of Procedure of the State Bar of California, Respondent, Victor R. Cannon, hereby submits the following verified response to the Notice of Disciplinary Charges (hereinafter "NDC") on file herein:

Under the provisions of the Rules of Procedure of the State Bar of California, Respondent Victor R. Cannon hereby generally denies each and every allegation of the NDC and the whole thereof and further denies that Respondent has violated any Rule of Professional Conduct in any

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1 manner whatsoever. In response to the specific allegations set forth in the NDC on file herein,  
2 Respondent Victor R. Cannon asserts:

3  
4 1. In response to Paragraph 1 of the NDC, Respondent admits said allegations for  
5 jurisdictional purposes only.

6  
7 Case No. 14-H-06099

8 COUNT ONE

- 9 2A. In response to Paragraph 2A of the NDC, Respondent denies said allegations.  
10 2B. In response to Paragraph 2B of the NDC, Respondent denies said allegations.  
11 2C. In response to Paragraph 2C of the NDC, Respondent denies said allegations.  
12 2D. In response to Paragraph 2D of the NDC, Respondent denies said allegations.  
13 2E. In response to Paragraph 2E of the NDC, Respondent denies said allegations.  
14 2F. In response to Paragraph 2F of the NDC, Respondent denies said allegations.

15  
16 VERIFICATION

17 I, Victor R. Cannon, declare under penalty of perjury that the foregoing is true and correct  
18 and that this declaration is executed at Seacrest California on June 23, 2015.

19  
20   
21 \_\_\_\_\_  
22 Victor R. Cannon

<b>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):</b> <b>Victor R. Cannon, 159841</b> <b>1236 Berkeley Drive</b> <b>Glendale, CA 91205</b> TELEPHONE NO.: 213-760-1400 FAX NO. (Optional): E-MAIL ADDRESS (Optional): vrcannon@me.com ATTORNEY FOR (Name):	<b>FOR COURT USE ONLY</b>  <h1 style="text-align: center;">FILED</h1> <p style="text-align: center;">JUN 25 2015</p> <p style="text-align: center;">STATE BAR COURT CLERK'S OFFICE SAN FRANCISCO</p>
<b>State Bar Court</b> STREET ADDRESS: MAILING ADDRESS: 180 Howard Street, 6th Floor CITY AND ZIP CODE: San Francisco, CA 94105 BRANCH NAME:	
<b>PLAINTIFF/PETITIONER:</b> State Bar of California <b>DEFENDANT/RESPONDENT:</b> Victor R. Cannon	<b>CASE NUMBER:</b> 14-H-06099
<p style="text-align: center;"><b>PROOF OF SERVICE—CIVIL</b></p> <p><b>Check method of service (only one):</b></p> <p> <input type="checkbox"/> By Personal Service            <input type="checkbox"/> By Mail            <input type="checkbox"/> By Overnight Delivery  <input checked="" type="checkbox"/> By Messenger Service            <input type="checkbox"/> By Fax            <input type="checkbox"/> By Electronic Service       </p> <p><b>JUDGE:</b> McElroy <b>DEPT.:</b> Hearing Dept.</p>	

(Do not use this proof of service to show service of a Summons and complaint.)

- At the time of service I was over 18 years of age and not a party to this action.
- My residence or business address is: *1664 EISENHOWER ST, SAN MATEO, CA 94403*
- The fax number or electronic service address from which I served the documents is (complete if service was by fax or electronic service):
- On (date): **June 25, 2015** I served the following documents (specify):  
**Respondent's Verified Answer to Notice of Disciplinary Charges**

The documents are listed in the Attachment to Proof of Service—Civil (Documents Served) (form POS-040(D)).

- I served the documents on the person or persons below, as follows:
  - Name of person served: **Catherine Taylor, Deputy Trial Counsel**
  - (Complete if service was by personal service, mail, overnight delivery, or messenger service.)  
 Business or residential address where person was served:  
**State Bar Court; 180 Howard Street; San Francisco, CA 94105**
  - (Complete if service was by fax or electronic service.)  
 (1) Fax number or electronic service address where person was served:

(2) Time of service:

The names, addresses, and other applicable information about persons served is on the Attachment to Proof of Service—Civil (Persons Served) (form POS-040(P)).

- The documents were served by the following means (specify):
  - By personal service. I personally delivered the documents to the persons at the addresses listed in item 5. (1) For a party represented by an attorney, delivery was made to the attorney or at the attorney's office by leaving the documents, in an envelope or package clearly labeled to identify the attorney being served, with a receptionist or an individual in charge of the office, between the hours of nine in the morning and five in the evening. (2) For a party, delivery was made to the party or by leaving the documents at the party's residence with some person not younger than 18 years of age between the hours of eight in the morning and six in the evening.

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6. b.  **By United States mail.** I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses in item 5 and (*specify one*):
- (1)  deposited the sealed envelope with the United States Postal Service, with the postage fully prepaid.
  - (2)  placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.
- I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at (*city and state*):
- c.  **By overnight delivery.** I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses in item 5. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.
- d.  **By messenger service.** I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed in item 5 and providing them to a professional messenger service for service. (*A declaration by the messenger must accompany this Proof of Service or be contained in the Declaration of Messenger below.*)
- e.  **By fax transmission.** Based on an agreement of the parties to accept service by fax transmission, I faxed the documents to the persons at the fax numbers listed in item 5. No error was reported by the fax machine that I used. A copy of the record of the fax transmission, which I printed out, is attached.
- f.  **By electronic service.** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed in item 5.

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

Date:

\_\_\_\_\_  
 (TYPE OR PRINT NAME OF DECLARANT)

▶ \_\_\_\_\_  
 (SIGNATURE OF DECLARANT)

(If item 6d above is checked, the declaration below must be completed or a separate declaration from a messenger must be attached.)

**DECLARATION OF MESSENGER**

- By personal service.** I personally delivered the envelope or package received from the declarant above to the persons at the addresses listed in item 5. (1) For a party represented by an attorney, delivery was made to the attorney or at the attorney's office by leaving the documents in an envelope or package, which was clearly labeled to identify the attorney being served, with a receptionist or an individual in charge of the office, between the hours of nine in the morning and five in the evening. (2) For a party, delivery was made to the party or by leaving the documents at the party's residence with some person not younger than 18 years of age between the hours of eight in the morning and six in the evening.

At the time of service, I was over 18 years of age. I am not a party to the above-referenced legal proceeding.

I served the envelope or package, as stated above, on (*date*):

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

Date:

LAWRENCE MCKELLAR  
 (NAME OF DECLARANT)  
 Lawrence McKellar

▶ Lawrence McKellar  
 (SIGNATURE OF DECLARANT)  
 Lawrence McKellar