

1 the charging papers. Respondent conducted meaningful work on
2 behalf of the client by preparing moving papers, a marital
3 settlement agreement and attending hearings on behalf of client.
4 Respondent was initially retained to respond to matters that may
5 arise while client was on active military duty. During that
6 period, Respondent was informed of a pending motion for child
7 support by the Department of Child Support Services and
8 contacted the Department and arranged the vacating of the
9 proceeding. Respondent also drafted moving papers, made
10 telephone calls on behalf of client.

11 COUNT THREE

12 4. Respondent denies generally and specifically each
13 allegation as stated in
14 the charging papers. To Respondent's knowledge, no accounting
15 was ever requested by client.

16 COUNT FOUR

17 5. Respondent partially admits to the allegations as stated
18 in the charging
19 papers. Respondent believes that he was, and currently is,
20 suffering from depression and a form of Post Traumatic Stress
21 Disorder that affected his ability to participate fully.
22 Respondent did speak with the investigator on at least one
23 occasion and expressed an intent to cooperate.

24 COUNT FIVE

25 6. Respondent denies generally and specifically each
26 allegation as stated in
27 the charging papers. Respondent completed a significant amount
28 of work on behalf of client Shivy, including, but not limited

1 to, reviewing a large volume of discovery documents relating to
2 clients' financial and property interests, consulting with
3 client regarding the division of community property and debts,
4 completing all documents necessary to complete the dissolution.
5 Client retained copies of the completed documents and used them
6 in completing the dissolution.

7 COUNT SIX

8 7. Respondent denies generally and specifically each
9 allegation as stated in
10 the charging papers. Respondent completed a significant amount
11 of work on behalf of client Shivy, including, but not limited
12 to, reviewing a large volume of discovery documents relating to
13 clients' financial and property interests, consulting with
14 client regarding the division of community property and debts,
15 completing all documents necessary to complete the dissolution.
16 Client retained copies of the completed documents and used them
17 in completing the dissolution.

18 COUNT SEVEN

19 8. Respondent denies generally and specifically each
20 allegation as stated in
21 the charging papers. To Respondent's knowledge, no accounting
22 was ever requested by client.

23 COUNT EIGHT

24 9. Respondent partially admits to the allegations as stated
25 in the charging
26 papers. Respondent believes that he was, and currently is,
27 suffering from depression and a form of Post Traumatic Stress
28 Disorder that affected his ability to participate fully.

1 Respondent did speak with the investigator on at least one
2 occasion and expressed an intent to cooperate.

3 COUNT NINE

4 10. Respondent partially admits and partially denies the
5 allegations in the
6 charging papers. Respondent settled client's personal injury
7 case and received a check on behalf of client in the amount of
8 \$5,500.00. Respondent did not, however deposit the check nor
9 deliver the check to client. Respondent believes that he was at
10 the time following August 2013, suffering from depression due to
11 significant personal events and a form of Post Traumatic Stress
12 Disorder due to a prior career in law enforcement that prevented
13 him from continuing his work for the client.

14 COUNT TEN

15 11. Respondent partially admits and partially denies the
16 allegations in the
17 charging papers. Respondent settled client's personal injury
18 case and received a check on behalf of client in the amount of
19 \$5,500.00. Respondent did not, however deposit the check nor
20 deliver the check to client. Respondent believes that he was at
21 the time following August 2013, suffering from depression due to
22 significant personal events and a form of Post Traumatic Stress
23 Disorder due to a prior career in law enforcement that prevented
24 him from continuing his work for the client.

25 COUNT ELEVEN

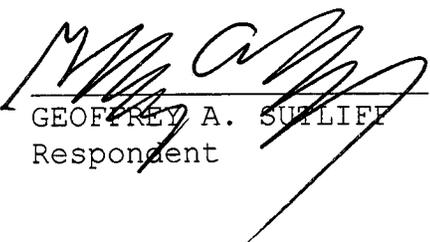
26 12. Respondent partially admits and partially denies the
27 allegations in the
28

1 charging papers. Respondent believes that he was at the time
2 following August 2013, suffering from depression due to
3 significant personal events and a form of Post Traumatic Stress
4 Disorder due to a prior career in law enforcement that prevented
5 him from continuing his work for the client.

6 COUNT TWELVE

7 13. Respondent partially admits to the allegations as
8 stated in the charging
9 papers. Respondent believes that he was, and currently is,
10 suffering from depression and a form of Post Traumatic Stress
11 Disorder that affected his ability to participate fully.
12 Respondent did speak with the investigator on at least one
13 occasion and expressed an intent to cooperate.

14
15 DATED: November 14, 2014


16 _____
17 GEOFFREY A. SULLIFF
18 Respondent
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SACRAMENTO

I am an attorney, duly authorized to practice law in the State of California. My principal place of business is located at 3838 Watt Avenue, Suite E-510, Sacramento, CA 95821.

On November 17, 2014, I served the foregoing documents described as **RESPONDENT'S RESPONSE TO NOTICE OF DISCIPLINARY CHARGES** on the parties by placing a true and correct copy thereof enclosed in a sealed envelope addressed as follows:

Attorney for PETITIONER:

SUSAN I. KAGAN
Office of the Chief Trial Counsel
180 Howard Street
San Francisco, CA 94105-1639

By regular U.S. Mail. The documents were placed for collection and mailing following ordinary business practice for deposit in the United Postal Service in a sealed envelope with postage thereon fully prepaid, addressed as stated above.

By personal service. I caused each such envelope to be delivered by hand to the addressee(s) stated above.

By facsimile transmitted from (707) 284-5527. The document transmission was reported as complete without error.

By Certified Mail, Return Receipt Requested, to the addressee(s) as stated above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed November 17, 2014, at Sacramento, California.


Ulric N. Duverney