

FILED

FEB 23 2015

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4 Chatsworth, CA 91311
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STATE BAR COURT CLERK'S OFFICE
SAN FRANCISCO

6 Attorneys for Daniel Peri Lucid

7
8 THE STATE BAR COURT
9 HEARING DEPARTMENT - LOS ANGELES

10 In the Matter of) Case Nos.: 14-O-02257-PEM;
11) 14-O-03026-PEM; 14-O-03916-PEM;
12 Daniel Peri Lucid, Respondent) 14-O-03934-PEM; 14-O-04302-PEM;
13) 14-O-04444-PEM; 14-O-04825-PEM
14)
15) RESPONDENT'S ANSWER TO NOTICE
16) OF DISCIPLINARY CHARGES
17)
18 A Member of the State Bar

19 TO THE HONORABLE PAT McELROY, JUDGE OF THE STATE BAR COURT
20 OF THE STATE BAR OF CALIFORNIA, AND TO SUPERVISING TRIAL COUNSEL
21 ASHOD MOORADIAN, OFFICE OF THE CHIEF TRIAL COUNSEL OF THE STATE
22 BAR OF CALIFORNIA:

23 Pursuant to Rule 5.43 of the Rules of Procedure of the
24 State Bar of California, Respondent Daniel Peri Lucid, by and
25 through his attorney(s) of record, hereby submits the following
26 in response to the Notice of Disciplinary Charges (hereinafter
27 "NDC") on file herein:

28 Under the provisions of the Rules of Procedure of the
State Bar of California, Respondent Daniel Peri Lucid hereby
responds to each and every allegation of the NDC and the whole

ANSWER TO NOTICE OF DISCIPLINARY CHARGES

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1 thereof and further denies the Respondent has violated any Rule
2 of Professional Conduct in any manner whatsoever. In response to
3 the specific allegations set forth in the NDC on file herein,
4 Respondent Daniel Peri Lucid asserts:

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

7
8 Case No. 14-O-02257

9 Count One

10 2. In response to Paragraph 2 of the NDC, Respondent
11 denies said allegations.

12 Count Two

13 3. In response to Paragraph 3 of the NDC, Respondent
14 denies said allegations.

15 Count Three

16 4. In response to Paragraph 4 of the NDC, Respondent
17 denies said allegations.

18
19 Case No. 14-O-03026

20 Count Four

21 5. In response to Paragraph 5 of the NDC, Respondent
22 denies said allegations.

23 Count Five

24 6. In response to Paragraph 6 of the NDC, Respondent
25 denies said allegations.

26 Count Six

27 7. In response to Paragraph 7 of the NDC, Respondent
28 denies said allegations.

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Case No. 14-O-03916

Count Seven

8. In response to Paragraph 8 of the NDC, Respondent denies said allegations.

Count Eight

9. In response to Paragraph 9 of the NDC, Respondent denies said allegations.

Count Nine

10. In response to Paragraph 10 of the NDC, Respondent denies said allegations.

Case No. 14-O-03934

Count Ten

11. In response to Paragraph 11 of the NDC, Respondent denies said allegations.

Count Eleven

12. In response to paragraph 12 of the NDC, Respondent denies said allegations.

Count Twelve

13. In response to Paragraph 13 of the NDC, Respondent denies said allegations.

Case No. 14-O-04302

Count Thirteen

14. In response to paragraph 14 of the NDC, Respondent denies said allegations.

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Count Fourteen

15. In response to paragraph 15 of the NDC, Respondent denies said allegations.

Count Fifteen

16. In response to paragraph 16 of the NDC, Respondent denies said allegations.

Case No. 14-O-04444

Count Sixteen

17. In response to paragraph 17 of the NDC, Respondent denies said allegations.

Count Seventeen

18. In response to paragraph 18 of the NDC, Respondent denies said allegations

Count Eighteen

19. In response to paragraph 19 of the NDC, respondent denies said allegations.

Case No. 14-O-04825

Count Nineteen

20. In response to paragraph 20 of the NDC, Respondent denies said allegations.

Count Twenty

21. In response to paragraph 21 of the NDC, Respondent denies said allegations.

Count Twenty-One

22. In response to paragraph 22 of the NDC, Respondent denies said allegations

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Dated: February 23, 2015

Respectfully submitted,
LAW OFFICES OF PAUL J. VIRGO

By: Paul J. Virgo

Paul J. Virgo
Attorney(s) for Respondent
Daniel Peri Lucid

///
///
///

DECLARATION OF SERVICE

Re: In the Matter of Daniel Peri Lucid

Case Nos.: 14-O-02257; 14-O-03026; 14-O-03916; 14-O-03934; 14-O-04302; 14-O-04444; and, 14-O-04825

I, Paul J. Virgo, declare:

I am over the age of 18 years and not a party to the within action. My business address is 9909 Topanga Canyon Blvd., #282, Chatsworth, California 91311, in the County of Los Angeles.

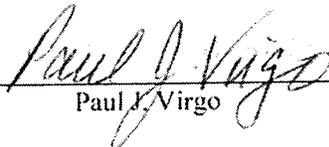
RESPONDENT'S ANSWER TO NOTICE OF DISCIPLINARY CHARGES

were hand delivered to:

State Bar Court-Hearing Department
State Bar of California
845 S. Figueroa Street
Los Angeles, CA 90017-2515

Ashod Mooradian, Supervising Trial Counsel
OCTC, Enforcement
845 S. Figueroa Street
Los Angeles, CA 90017-2515

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and this declaration was executed at Chatsworth, California, on February 23, 2015


Paul J. Virgo