1 CENTURY LAW GROUP Edward O. Lear, No. 132699 2 Paul J. Virgo (Of Counsel), No. 67900 5200 West Century Blvd., Suite 345 Los Angeles, California 90045 3 Telephone: (310) 642-6900 5 6 7 8 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24

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STATE BAR COURT **CLERK'S OFFICE** LOS ANGELES

Attorneys for Richard Clay Mendez

THE STATE BAR COURT HEARING DEPARTMENT - LOS ANGELES

In the Matter of	Case Nos.: 14-0-04026;
j	14-0-04815;
]	14-0-05386;
	14-0-05959
RICHARD CLAY MENDEZ, Respondent	14-0-06202;
, <u>.</u>	14-J-05673
No. 199927	
	RESPONDENT'S ANSWER TO NOTICE
	OF DISCIPLINARY CHARGES
A Member of the State Bar	•

TO THE HONORABLE DONALD F. MILES, JUDGE OF THE STATE BAR COURT OF THE STATE BAR OF CALIFORNIA, AND DEPUTY TRIAL COUNEL KEVIN BUCHER, 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 Richard Clay Mendez, by and through his attorney(s) of record, hereby submits the following in 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 Richard Clay Mendez hereby generally denies each and every allegation of the NDC and the

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whole thereof and further denies the Respondent has violated any Rule of Professional Conduct in any manner whatsoever. In response to the specific allegations set forth in the NDC on file herein, Respondent Richard Clay Mendez asserts:

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

Case No. 14-0-04026

COUNT ONE

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

COUNT TWO

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

COUNT THREE

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

Case No. 14-0-04815

COUNT FOUR

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

COUNT FIVE

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

COUNT SIX

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

Case No.14-0-05386

COUNT SEVEN

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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.

Case No. 14-0-05959

COUNT NINE

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

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.

Case No.14-0-06202

COUNT TWELVE

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

COUNT THIRTEEN

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

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Case No. 14-J-05673

COUNT FOURTEEN

15. In response to paragraph 15 of the NDC, Respondent admits said allegations in part and denies said allegations in part. Respondent admits paragraphs 15 through 17. Respondent denies paragraph 18.

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

Respectfully submitted,
CENTURY LAW GROUP

By:

Paul J. Virgo, Of Counsel Attorneys for Respondent

Richard Clay Mendez

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DECLARATION OF SERVICE BY MAIL

Re: In the Matter of Richard Clay Mendez

Case No.: 14-O-04026; 14-O-04815; 14-O-05386; 14-O-05959; 14-O-06202; and, 14-J-05673

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

On July 17, 2015, I caused to be mailed by U. S. mail

RESPONDENT'S ANSWER TO NOTICE OF DISCIPLINARY CHARGES

to:

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

By Email to:

R. Kevin Bucher, Deputy Trial Counsel OCTC, Enforcement 845 S. Figueroa Street Los Angeles, CA 90017-2515 Kevin.bucher@calbar.ca.gov

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 July 17, 2015

Paul J. Virgo, E