

1 Anthony Radogna, Bar #261859  
2 Law Offices of Anthony Radogna  
3 1 Park Plaza, Suite 600  
4 Irvine, CA 92614  
5 P (909) 622-5049

6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
Counsel for Respondent

**FILED**

**MAY 15 2015**

STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

**THE STATE BAR COURT  
OF THE STATE BAR OF CALIFORNIA  
HEARING DEPARTMENT- LOS ANGELES**

IN THE MATTER OF  
MING LI,  
Member No. 174894,  
A Member of the State Bar

) Case No. : 14-O-4906, 15-O-10115

) **RESPONSE:**

) **NOTICE OF  
DISCIPLINARY CHARGES**

TO THE OFFICE OF THE CHIEF TRIAL COUNSEL OF THE STATE BAR OF  
CALIFORNIA AND TO ITS TRIAL COUNSEL OF RECORD:

MING LI (Respondent), by and through his attorney of record herein, Law Offices of  
Anthony Radogna, hereby responds to the Notice of Disciplinary Charges as follows below.

**JURISDICTION**

1. Responding to paragraph 1 of the Notice of Disciplinary Charges, Respondent  
admits the allegations stated in that paragraph.

///

///

///



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**COUNT ONE**

2. Responding to paragraph 2 of the Notice of Disciplinary Charges, Respondent denies the allegations and assumptions stated in that paragraph.

**COUNT TWO**

3. Responding to paragraph 3 of the Notice of Disciplinary Charges, Respondent denies the allegations and assumptions stated in that paragraph. Respondent performed competently.

**COUNT THREE**

4. Responding to paragraph 4 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that paragraph.

**COUNT FOUR**

5. Responding to paragraph 4 of the Notice of Disciplinary Charges, Respondent denies the allegations stated in that paragraph.

**AFFIRMATIVE DEFENSES**

1. The Notice of Disciplinary Charges and every count in it, fails to plead a disciplinable offense.

2. Counts 1, 2, 3, 4 fail to provide adequate notice of the conduct alleged to violate the rule and fail to relate stated facts to rules allegedly violated as required by rule 5.41(B)(3), Rules of Procedure of the State Bar of California and applicable case law (*In the Matter of Glasser* (Review Dept 1990) 1 Cal. State Bar Ct. Rptr. 163; *In the Matter of Varakin* (Review Dept. 1994) 3 Cal. State Bar Ct. Rptr. 179.)

Respectfully submitted,

Dated: May 15, 2015

LAW OFFICES OF ANTHONY RADOGNA

  
\_\_\_\_\_  
Anthony Radogna Esq.  
Counsel for Respondent

## DECLARATION OF SERVICE

I, the undersigned, over the age of eighteen, declare that  I am /  am not a party to the within action, in the City and County of Los Angeles, on 5-15-15, served the following document(s):

Response to NDC - 17-0-4906, 15-0-10115

by personal delivery:

Inter-office mail

Anthony Garcia, STC

845 South Figueroa

other:

I declare under penalty of perjury at Los Angeles, California, on the date shown below, that the foregoing is true and correct.

Dated: \_\_\_\_\_

5-15-15

