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4

**FILED**

SEP -3 2015

STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

5 Attorney for Respondent in Pro per  
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8  
9 **STATE BAR COURT**  
10 **HEARING DEPARTMENT-LOS ANGELES**

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12 In the matter of )  
13 EUGENE ROY SALMONSEN JR. )  
No. 81079 )  
14 A member of the State Bar )  
15

CASE NO.: 14-0-06281

**ANSWER TO CHARGES FILED**

16 Please take notice that Respondent Eugene R. Salmonsens answers the  
17 complaint filed against him as follows:  
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19 First Cause of Action

20 As to Count 1 of the complaint Respondent herein denies the entirety the  
21 allegations in Count 1 of the complaint  
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23 Answer to the Second Cause of Action

24 As to Count 2 of the complaint Respondent herein denies the entirety the  
25 allegations in Count 2 of the complaint.  
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27 **FIRST AFFIRMATIVE DEFENSE**

28 Count 1 of the Complaint is insufficient as a matter of Law to sustain a



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complaint for failure to cooperate since the Respondent sent a written response to the allegations as soon as he became aware of them.

**SECOND AFFIRMATIVE DEFENSE**

Count 2 of the complaint is insufficient as a matter of Law to sustain a complaint for failure to cooperate since the Respondent sent a written response to the allegations as soon as he became aware of them.

Dated: September 8,2015

LAW OFFICES OF EUGENE R. SALMONSEN



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Eugene R. Salmonsén  
Attorney for in pro per

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA )  
3 COUNTY OF LOS ANGELES )

4 I am employed in the County of Los Angeles, State of California. I am over the age  
5 of eighteen years and not a party to the within entitled action; my business address is 3415  
6 South Sepulveda Boulevard, Suite 560, Los Angeles, California 90034.

7 On April 27, 2012, I served the following document described as,, by delivery on the  
8 interested parties in this action as follows:

9  
10 SUE HONG, ESQ.  
11 STATE BAR OF CALIFORNIA  
12 OFFICE OF CHIEF TRIAL COUNSEL  
13 84845 S. Figueroa St., Los Angeles, CA 90017 – 2515

13  (BY UNITED STATES MAIL) I placed such envelope with postage thereon fully  
14 prepaid in the United States mail at Los Angeles, California.

15  CERTIFIED MAIL RETURN RECEIPT REQUESTED

16  (BY PERSONAL SERVICE) I caused such document to be delivered by hand to the  
addressee.

17  (BY FACSIMILE TRANSMISSION) I caused the above described documents (s) to  
18 be transmitted via facsimile to the fax numbers indicated above on the interested parties  
in this action.

19  (BY FEDERAL EXPRESS) I placed such document (s) in a Federal Express  
20 package marked Priority Overnight and deposited same at a Federal Express Facility  
regularly serviced by Federal Express.

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

23 Executed on August 8, 2015 at Los Angeles, California.

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Eugene R. Salmonsens, Esq.