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CENTURY LAW GROUP LLP
Edward O. Lear, SBN 132699
5200 West Century Boulevard, Suite 345
Los Angeles, California 90045
Telephone: (310) 642-6900
Facsimile: (310) 642-6910

Attorneys for Respondent
Le’Roy Travelle Roberson

FILED

JAN 04 2016
STATE BAR COURT
CLERK’S OFFICE
LOS ANGELES

STATE BAR COURT
HEARING DEPARTMENT – LOS ANGELES

In the Matter of) Case Nos.: 15-O-11236, 15-O-12178
LE’ROY TRAVELLE ROBERSON,)
No. 254892) **ANSWER TO THE NOTICE OF**
) **DISCIPLINARY CHARGES**
Members of the State Bar.)

TO: THE STATE BAR COURT OF CALIFORNIA

Pursuant to Rule 5.41 of the Rules of Procedure of the State Bar of California, Respondent Le’Roy Travelle Roberson, by and through his attorney of record, Edward O. Lear, hereby submits the following in response to the Notice of Disciplinary Charges on file herein:

Respondent was admitted to the practice of Law in the State of California on January 8, 2008, and at all relevant times herein, has been a member of the State Bar of California.

Under the provisions of Rules of Procedure of the State Bar of California, Respondent hereby generally denies each and every allegation of the Notice of Disciplinary Charges and the



1 whole thereof, and further denies that the Respondent has violated any Rule of Professional Conduct
2 in any manner whatsoever.

3 In response to the specific allegations on information and belief set forth in the Notice of
4 Disciplinary Charges on file herein, Respondent Le’Roy Travelle Roberson asserts:

5 **JURISDICTION**

6 1. In response to Paragraph 1 of the Notice of Disciplinary Charges (“NDC”),
7 Respondent admits said allegations.

8 **COUNT ONE**

9 Case No. 15-O-11236

10 2. Respondent objects to the allegations of Paragraph 2 of the NDC because they are
11 conclusory, compound, and intertwined with legal conclusions. Notwithstanding said objection,
12 Respondent denies the allegations contained in Paragraph 2 of the NDC.

13 **COUNT TWO**

14 Case No. 15-O-12178

15 3. Respondent objects to the allegations of Paragraph 3 of the NDC because they are
16 conclusory, compound, and intertwined with legal conclusions. Notwithstanding said objection,
17 Respondent denies the allegations contained in Paragraph 3 of the NDC.

18 **AFFIRMATIVE DEFENSES**

19 **FIRST AFFIRMATIVE DEFENSE**

20 (Failure to State Sufficient Facts)

21 The Notice of Disciplinary Charges, and each of its purported counts, fails to state facts
22 sufficient to state a basis for discipline.

23 **SECOND AFFIRMATIVE DEFENSE**

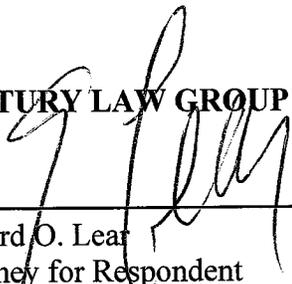
24 (Charges Do Not Constitute Willful Misconduct)

25 The facts on which some or all of the Notice of Disciplinary Charges are based constitute
26 mistake, inadvertence, neglect, or error and do not rise to the level of willful misconduct.

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DATED: January 4, 2016

CENTURY LAW GROUP LLP



Edward O. Lear
Attorney for Respondent
Le'Roy Travelle Roberson

DECLARATION OF SERVICE BY PERSONAL SERVICE

Re: In the Matter of Le’Roy Travelle Roberson

No.: 15-11236, 15-O-12178

I, Kathy Ferrera, declare:

I am over the age of 18 years and not a party to the within action. My business address is 5200 W. Century Blvd., Suite 345, Los Angeles, California 90045, in the County of Los Angeles.

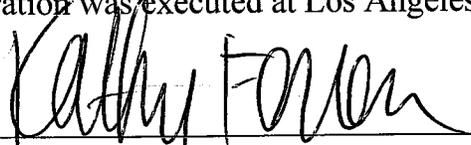
On January 4, 2016 I caused to be personally served, the attached:

ANSWER TO THE NOTICE OF DISCIPLINARY CHARGES

On:

William Todd Deputy Trial Counsel 845 S. Figueroa Street Los Angeles, CA 90012	
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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 Los Angeles, California, on January 4, 2016.


Kathy Ferrera