

**FILED**

**JAN 11 2016**

STATE BAR COURT  
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LOS ANGELES

1 Daniel E. Hibbard  
2 2893 David Street  
3 Riverside, California 92506

4 Attorney for: In Pro Per

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6 **STATE BAR COURT FOR THE STATE OF CALIFORNIA**  
7

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9 In The Matter of Daniel Hibbard, State Bar  
10 Number 138147

CASE NO.: 15-0-11384 and 15-0-11486

ANSWER TO NOTICE OF DISCIPLINARY  
CHARGES

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16 In Answer to the charges set forth against me in the above-referenced action, I  
17 acknowledge that I did not maintain the amounts required in my trust account. In making this  
18 acknowledgement, I can only set forth my profound regret in doing so. If it matters, the  
19 circumstances of my life were exceedingly tenuous at the time, and largely remain so today.  
20 During this time, I was at a point where there was no cash flow into the business. I was behind in  
21 my mortgage payments, I did not have any means of buying food for my family. I was getting  
22 behind on all of my bills. I was unable to pay my office rent. I desperately tried to borrow money  
23 from any source I could find, but was unable to do so.

24 During this time, my car, a 1999 Town Car broke down multiple times and needed repair.  
25 It was the primary mode of transportation for my family, yet I had no money to fix the car. Out of  
26 a sense of desperation, I took the funds as alleged in the complaint. At the time, I believe, I was  
27 depressed, although I did not have the funds necessary to seek assistance, nor did I have any health  
28 insurance for my family or myself. I was frantically attempting to obtain cash flow through flat



1 fee legal services and/or employment anywhere so that I could provide for my family. I sent out a  
2 multitude of applications in an effort to obtain employment. Unfortunately, I could not even get  
3 interviews based upon those applications. I spoke with a recruiter who attempted to find  
4 employment for me, he was not successful and told me that the problem was my longstanding self-  
5 employment, and possibly my age.

6 I am currently not working for myself. I no longer have any access to a client trust  
7 account, nor do I ever want such access again. Prior to this period of my life, I never had so much  
8 as a phone call complaint to the state bar in 26 years. This is certainly a major mark against me in  
9 my career. I can only hope that it is not defining of my career. The things I did here I only did out  
10 of sheer panic and desperation.

11 In the resolution of the case of Mr. Valente and the Niebeckers, I have paid them  
12 everything they were owed under the settlements. With regard to Mr. Valente, I sent the check to  
13 Meridian immediately after depositing \$10,000.00 into my checking account. That money was  
14 borrowed from a family friend. I believed that those funds would be negotiated promptly by  
15 Meridian. It was not my intention to defraud that company. The funds were in my account at the  
16 time the check was written.

17 With regard to the Niebeckers, they were excellent clients and I am sick about these  
18 events. The charges against me indicate that the last payment I made to them was in the amount of  
19 \$20,000.00. I also paid them an additional amount of \$6,300.00 in 2014. I also paid medical bills  
20 in the amount of \$2210.00 to, I believe, Eisenhower Medical Center, and \$1250.00 to Ms.  
21 Niebecker's chiropractor. The amount of the remaining payment was to one last medical provider.  
22 That amount was negotiated to the total sum of \$13,441.00. That amount has not been paid.

23 I cannot defend my actions. I can only say that they were performed under extreme duress  
24 while I was trying anyway possible to bring money into my business or obtain outside  
25 employment. I cannot fully express my deep shame, despair and regret with regard to this matter.  
26 I understand that I have forfeited the right to determine my own fate by my actions. I can only  
27 request that you look at my entire career, and not at the worst of my career in rendering judgment  
28 upon me. My only interest is to have an opportunity to make things right with Mr. Valente and the

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Neibeckers, as well as having an opportunity to provide for my family. I pray that I have not thrown this opportunity away.

Date: January 8, 2016



Daniel E. Hibbard

## 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 1/11/2016, served the following document(s):

*ANSWER TO NOTICE OF DISCIPLINARY CHARGES*

by personal delivery:

*MURRAY GREENBERG, ESQ.  
STATE BAR OF CA.  
LOS ANGELES, CA.*

other:

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

Dated: 1/11/2016

