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8 Attorneys for Respondent,  
9 Angela L. Polk

**FILED**

**NOV 19 2015**

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

10 THE STATE BAR COURT

11 HEARING DEPARTMENT- LOS ANGELES

12 In the Matter of:  
13 ANGELA LAUER POLK  
14 No. 157197

15 A Member of the State Bar

Case No: 15-O-11924

RESPONSE TO NOTICE OF DISCIPLINARY  
CHARGES

Hon. Yvette D. Roland

16  
17 In response to the Notice of Disciplinary Charges filed October 20, 2015, Respondent  
18 ANGELA LAUER POLK hereby appears and responds as follows:

19 RESPONSE TO COUNT ONE

20 Respondent denies the allegations of Count One to the extent it alleges a willful violation  
21 of Business and Professions Code 6106. Respondent further responds that as a result of an  
22 inadvertent mistake, Respondent incorrectly reported that she had fully complied with the  
23 minimum continuing legal education ("MCLE" requirements for the period of February 1, 2011  
24 to January 31, 2014. Respondent alleges that she did not know of her error when reported, and  
25 was not grossly negligent in failing to know that she had not completed the required MCLE  
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RESPONSE TO NOTICE OF DISCIPLINARY CHARGES

BRANSON BRINKOP GRIFFITH & CAMPO LLP  
643 BAIR ISLAND ROAD, SUITE 400  
REDWOOD CITY, CALIFORNIA 94063  
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1 when she reported compliance on or about February 6, 2014. When the State Bar sent  
2 Respondent a Notice of Audit, Respondent immediately responded and rectified the error.

3 RESPONSE TO COUNT TWO

4 Respondent denies the allegations of Count Two since she was unaware of the  
5 disciplinary investigation pending against respondent. Respondent did not fail to cooperate and  
6 participate because she was not aware of the investigation or the request to respond and  
7 participate. Respondent did not receive the State Bar's letters of June 1, 2015 and July 7, 2015  
8 allegedly requesting Respondent's response to the allegations of misconduct. Respondent  
9 asserts that if she had received the June 1, 2015 and July 7, 2015 letters from the State Bar, she  
10 would have cooperated and participated in the State Bar investigation as is evidenced by her  
11 initial timely cooperation in the State Bar MCLE Audit conducted in 2014.

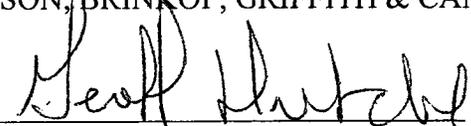
12 As a separate Affirmative Defense, Respondent pleads as follows:

- 13
- 14 1. Respondent asserts as an Affirmative Defense that neither Count One nor Count  
15 Two allege conduct which would pose a threat of harm to the interests of Respondent's clients or  
16 to the public, such that Inactive Enrollment is an extreme punishment, not warranted by the facts.  
17
  - 18 2. Respondent asserts that she has no prior history of complaints or discipline, and  
19 that any suspension or limitation in her ability to practice law would be an extreme punishment  
20 that is not warranted by the facts.  
21

22 November 18, 2015

Respectfully Submitted.

23 BRANSON, BRINKOP, GRIFFITH & CAMPO LLP

24  
25 By: 

JOHN R. CAMPO, ESQ.

GEOFFREY A. HUTCHINSON, ESQ.

Attorneys for Angela Lauer Polk  
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**PROOF OF SERVICE**

I declare that: I am employed in the County of San Mateo, California. I am over the age of eighteen (18) and not a party to the within entitled cause; my business address is 643 Bair Island Road, Suite 400, Redwood City, California 94063.

On the date below, in the manner indicated, I caused the within document(s) entitled:

**RESPONSE TO NOTICE OF DISCIPLINARY CHARGES**

to be served on the party(s) or their attorney(s) of record in this action:

**Via Mail:** That I am readily familiar with our business practice for collection and processing of mail. On the same day that correspondence is placed for collection and mailing, it is deposited with the United States Postal Service that same day in the ordinary course of business, that the name and address of the person served as shown on the envelope, and the date and place of business where the correspondence is placed for deposit in the United States Postal Service and that the envelope was sealed and placed for collection and mailing on that date following ordinary business practices.

**Via Personal Service:** I instructed each envelope to be hand-delivered via

**Via Overnight Courier:** I caused each envelope to be delivered via overnight mail by Federal Express.

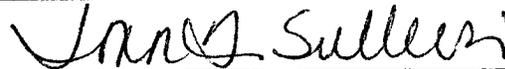
**Via Facsimile:** I instructed such to be transmitted via facsimile to the office(s) of the addressee(s).

**Electronically:** By submitting copies electronically to the parties at the e-mail addresses listed below.

Addressed as follows:

Jamie Kim, Esq.  
Deputy Trial Counsel  
State Bar of California  
845 South Figueroa Street  
Los Angeles, CA 90017-2515  
Tel: (213) 765-1182  
e-mail: [Jamie.kim@calbar.ca.gov](mailto:Jamie.kim@calbar.ca.gov)

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on November 18, 2015, at Redwood City, California.



Joan T. Sullivan

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