

1 EDWARD W. PACHECO (SBN 91903)
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FILED

FEB 17 2016

STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

STATE BAR COURT

HEARING DEPARTMENT - LOS ANGELES

10 IN the Matter of ,) Case No.: 15-O-12690
11)) 15-O-13748
12 EDWARD W. PACHECO,)
13 (SBN 91903)) NOTICE OF DISCIPLINARY CHARGES
14) (RESPONSE)
15)
16)
17)

A Member of the State Bar

JURISDICTION

I Admit allegation of jurisdiction.

COUNT ONE

I deny all allegations of paragraph one.

Please take notice. I did not file Laura Nunez' case in
bankruptcy. She was in pro per because it was a matter outside
of Los Angeles County. Moreover, it was her sister in law Ms.
Sanchez who negotiated with my part time clerk to file the

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1 matter in pro per, in the name of Laura Nunez. I appeared on the
2 341(a) hearing in Riverside County on September 18, 2014 @ 800am
3 and October 01, 2014 @ 1:30pm my second appearance. The Trustee
4 Mr. Robert S. Whitmore demanded, and I complied with the demand
5 to file a substitution of attorney which should be a matter of
6 record. It was file by mail. I deny that Ms. Nunez petition was
7 incomplete. Her petition contained each and every asset and
8 credit obligation that I knew and was informed about it.

9 COUNT TWO

10 I received \$1,700.00 for my services the petition was filed
11 in pro per and she signed. BD203 was not called for. I subbed
12 around October 01, 2014 months later and at the insistence of
13 the bankruptcy trustee. I entered my appearance on the record
14 thus the court was aware of my involvement in the matter. I deny
15 I willfully violated any rules of B&D 6068 (d).

16 CONT THREE

17 I deny all allegations of this paragraph. Trustee chided me
18 verbally. In his words he said I charged Ms. Nunez several
19 thousands of dollars. I believe he said four or seven thousand
20 dollars. I informed the trustee of my true fees and charges.

21 COUNT FOUR

22 I deny allegations of paragraph four Ms. Nunez never asked me
23 for a refund. I would have been glad to do so because the case
24 had attracted unusual difficulties. These were in part cause by
25

1 the trustee apparent ignorance of or disregard for the salient
2 fact of the case.

3 No problem with Ms. Nunez residential property became an
4 issue. The issue was the debt where Ms. Nunez was purchasing a
5 new car by a payroll deduction or other bank automatic
6 electronic payment device. Ms. Nunez was unable to provide the
7 trustee with a general customary creditor address city and zip
8 code. The creditor Toyota Financial Services was less than
9 cooperative with provision of the address even so, the creditor
10 continued to be pad automatically an the account was kept up to
11 date. Ms. Nunez petition clearly indicated she was to continue
12 the payments. Nobody nor Ms. Nunez nor I acted with intent to
13 withhold the value of her interest in the car she was buying
14 which was of insufficient value to produce valuable equity. This
15 information was given to the trustee at the 341(a) hearing.

16 COUNT FIVE

17 I deny allegations of paragraph 5. I never got any request,
18 written nor verbal for a refund. I would have most happily given
19 it to her.

20 COUNT SIX

21 Deny same as count five.

22 COUNT SEVEN

23 I deny in part. I didn't know that I was inactive. I had
24 apparently not paid my bar dues. I was embarrassed. I was
25 helping Ruben Navarro a fellow disabled veteran, United States

1 Marines Corp. I am a United States Army Veteran. I paid my dues
2 and was re-instated upon payment. It was stupid of one but
3 that's the only time in over 30 years.

4
5 COUNT EIGHT
6

7 I deny in part. I didn't know that I was inactive. I had
8 apparently not paid my bar dues. I was embarrassed. I was
9 helping Ruben Navarro a fellow disabled veteran, United States
10 Marines Corp. I am a United States Army Veteran. I paid my dues
11 and was re-instated upon payment. It was stupid of one but
12 that's the only time in over 30 years.

13 COUNT NINE
14

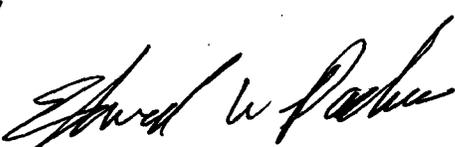
15 Deny. I never represented anything to the court. The court
16 admonished me in front of a court room full of lawyers and
17 judges. That was the first time I became aware that I had been
18 punished for not paying my bar dues. I will not happen again.

19
20 COUNT TEN

21 I did not fully fail to cooperate. I did contact the
22 investigator. During this period of time, since April 2015 til
23 January 2016 and continuing I have been receiving from the
24 effects of a majar surgery at the Veterans Hospital at Westwood,
25

1 California. I have no funds to hire a professional help. I have
2 been weakened with a debilitating flu-like malady. I am seventy
3 nine years old, arthritic and under treatment for diabetes. Bunt
4 my mind and intellect remain unaffected.

5 DATED: January 29, 2015

6
7  
8 EDWARD W. PACHECO
9 ATTORNEY AT LAW
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1 [PROOF OF SERVICE BY MAIL]

2 I am employed in the County of Los Angeles; I am over the
3 age of eighteen years and not a party to the within action; my
4 business is 5410 East Beverly Blvd., Suite 100, Los Angeles, CA
5 90022.

6 On January 29, 2016, I served the foregoing document(s)
7 described as: NOTICE OF DISCIPLINARY CHARGES, (Response)
8 on interested parties in this action by placing the
9 correspondence in sealed envelope on this date in the City of
10 Los Angeles, State of California and placing it for deposit with
11 the United State Postal Service. This sealed envelope with
12 postal fully prepaid was then placed for collection and mailing
13 on this date following ordinary business practice as follows:

14 STATE BAR OF CALIFORNIA
15 ATTN: DIANE J. MEYERS, DEPUTY TRIAL COUNSEL
16 845 SOUTH FIGUEROA STREET
17 LOS ANGELES, CA 90017-2515

18 X((By Mail) I deposited such envelope in the mail at Los
19 Angeles, California. The envelope was mailed with postage
20 thereon fully prepaid. I am "readily Familiar" with my firms
21 practice of collection and processing correspondence for
22 mailing. It is deposited with United States Postal Service on
23 that same daily in the ordinary course of business. I am aware
24 that on the motion of the party(ies) served, service is presumed
25 invalid if the postal cancellation date or postage meter date is
more than 1 day after date of deposit for mailing in affidavit.

Executed on January 29, 2016, at Los Angeles, California.

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



Lupe Ramirez