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11 Attorneys for Respondent  
12 Yelena Aneley Gurevich

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STATE BAR COURT  
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**STATE BAR COURT**  
**HEARING DEPARTMENT – LOS ANGELES**

11 In the Matter of ) Case Nos.: 15-O-12766  
12 YELENA ANELEY GUREVICH, )  
13 No. 269487 ) **ANSWER TO THE NOTICE OF**  
14 Members of the State Bar. ) **DISCIPLINARY CHARGES**

20 TO: THE STATE BAR COURT OF CALIFORNIA

21 Pursuant to Rule 5.41 of the Rules of Procedure of the State Bar of California, Respondent  
22 Yelena Aneley Gurevich, by and through her attorney of record, Edward O. Lear, hereby submits the  
23 following in response to the Notice of Disciplinary Charges on file herein:

24 Respondent was admitted to the practice of law in the State of California on May 18, 2010,  
25 and at all relevant times herein, has been a member of the State Bar of California.

26 Under the provisions of Rules of Procedure of the State Bar of California, Respondent  
27 hereby generally denies each and every allegation of the Notice of Disciplinary Charges and the  
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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 Yelena Aneley Gurevich 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 2. Respondent objects to the allegations of Paragraph 2 of the NDC because they are  
10 conclusory, compound, and intertwined with legal conclusions. Notwithstanding said objection,  
11 Respondent denies the allegations contained in Paragraph 2 of the NDC.

12 **COUNT TWO**

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

16 **COUNT THREE**

17 4. Respondent objects to the allegations of Paragraph 4 of the NDC because they are  
18 conclusory, compound, and intertwined with legal conclusions. Notwithstanding said objection,  
19 Respondent denies the allegations contained in Paragraph 4 of the NDC.

20 **COUNT FOUR**

21 5. Respondent objects to the allegations of Paragraph 5 of the NDC because they are  
22 conclusory, compound, and intertwined with legal conclusions. Notwithstanding said objection,  
23 Respondent denies the allegations contained in Paragraph 5 of the NDC.

24 **COUNT FIVE**

25 6. Respondent objects to the allegations of Paragraph 6 of the NDC because they are  
26 conclusory, compound, and intertwined with legal conclusions. Notwithstanding said objection,  
27 Respondent denies the allegations contained in Paragraph 6 of the NDC.

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**AFFIRMATIVE DEFENSES**

**FIRST AFFIRMATIVE DEFENSE**

(Failure to State Sufficient Facts)

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

**SECOND AFFIRMATIVE DEFENSE**

(Duplicative Charges)

The Notice of Disciplinary Charges contains inappropriate, unnecessary, and immaterial duplicative charges. *Bates v. State Bar* (1990) 51 Cal.3d 1056, 1060; *In the Matter of Lilley* (Rev. Dept. 1991) 1 Cal. State Bar Ct. Rptr. 476, 585.

**THIRD AFFIRMATIVE DEFENSE**

(Lack of Materiality)

The facts on which some or all of the Notice of Disciplinary charges are based allege immaterial or irrelevant omissions or statements.

**FOURTH AFFIRMATIVE DEFENSE**

(Charges Do Not Constitute Willful Misconduct)

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

DATED: January 4, 2016

**CENTURY LAW GROUP LLP**



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Edward O. Lear  
Attorney for Respondent  
Yelena Aneley Gurevich

**DECLARATION OF SERVICE BY PERSONAL SERVICE**

Re: In the Matter of Yelena Aneley Gurevich

No.: 15-O-12766

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.

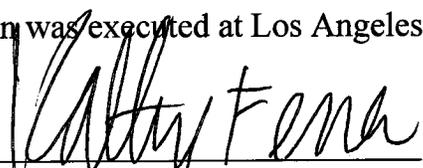
On January 4, 2016 I caused to be personally served, the attached:

**ANSWER TO THE NOTICE OF DISCIPLINARY CHARGES**

On:

Anand Kumar Deputy Trial Counsel 845 S. Figueroa Street Los Angeles, CA 90017	
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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