

1 In response to the specific allegations on information and belief set forth in the Notice of
2 Disciplinary Charges on file herein, Respondent Dean Robert Kitano asserts:

3 **JURISDICTION**

4 1. In response to Paragraph 1 of the Notice of Disciplinary Charges ("NDC"),
5 Respondent admits said allegations.

6 **COUNT ONE**

7 Case No. 15-O-13354

8 2. In response to Paragraph 2 of the NDC, Respondent admits said allegations.

9 **COUNT TWO**

10 Case No. 15-O-13354

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

14 **COUNT THREE**

15 Case No. 15-O-13354

16 4. Respondent objects to the allegations of Paragraph 4 of the NDC because they are
17 conclusory, compound, and intertwined with legal conclusions. Notwithstanding said objection,
18 Respondent admits that he filed the declaration referred to in Paragraph 4 of the NDC, but
19 Respondent denies that said declaration was false.

20 **COUNT FOUR**

21 Case No. 15-O-13354

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

(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.

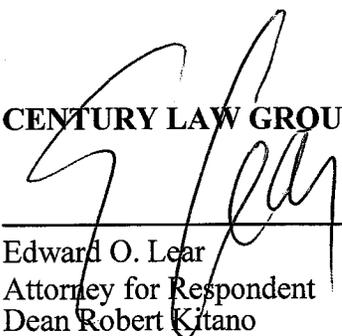
THIRD AFFIRMATIVE DEFENSE

(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: June 6, 2016

CENTURY LAW GROUP LLP



Edward O. Lear
Attorney for Respondent
Dean Robert Kitano

DECLARATION OF SERVICE BY PERSONAL SERVICE

Re: In The Matter of Dean Robert Kitano

No.: 15-O-13354

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.

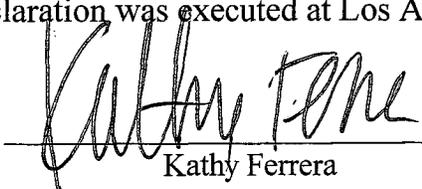
On June 7, 2016 I caused to be personally serve, the attached:

ANSWER TO THE NOTICE OF DISCIPLINARY CHARGES

on:

Kim Kasreliovich Senior Trial Counsel State Bar of California 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 June 7, 2016.


Kathy Ferrera