

1 **MICHAEL E. WINE (State Bar No. 58657)**
2 **Attorney at Law**
3 **80 W. Sierra Madre Blvd., #355**
4 **Sierra Madre, California 91024**
5 **Telephone: (626) 796-6688**
6 **ethicsatty@verizon.net**
7
8 **Attorney for Respondent**

FILED

MAY 12 2016

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

9 STATE BAR COURT

10 HEARING DEPARTMENT-LOS ANGELES

11
12 In the Matter of:) Case No. 15-O-14576-DFM
13 THOMAS OSMOND RUSSELL, III,)
14 No. 107800) RESPONSE TO NOTICE OF
15 A Member of the State Bar) DISCIPLINARY CHARGES
16)

17 Respondent **THOMAS RUSSELL, III** responds to the Notice of Disciplinary Charges
18 ("Notice") on file herein, by admitting, denying and alleging as follows:

19 The name and address of Respondent's counsel of record is:

20 **MICHAEL E. WINE**
21 **80 W. Sierra Madre Blvd., #355**
22 **Sierra Madre, California 91024**

23 All further pleadings in this matter should be directed to Respondent's counsel at this
24 address.

25 1. Respondent does not contest the allegations contained in paragraph 1 of the Notice.



COUNT ONE

1
2 2. Respondent does not contest the allegations contained in lines 9 through the word
3 “CTA” found at line 19 of paragraph 2 on page 2 of the Notice. Respondent denies the
4 reaminader of that paragraph and denies that he willfully violated Rule of Professional Conduct
5 4-100(A).

COUNT TWO

6
7 3. Respondent does not contest the allegations contained in lines 8 through the word
8 “CTA” found at line 18 of paragraph 3 on page 3 of the Notice. Respondent denies the
9 reaminader of that paragraph and denies that he willfully violated Business and Professions Code
10 Section 6106.
11

COUNT THREE

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13 4. Respondent does not contest the allegations contained in lines 8 through the word
14 “CTA” found at line 18 of paragraph 4 on page 4 of the Notice. Respondent denies the
15 reaminader of that paragraph and denies that he willfully violated Business and Professions Code
16 Section 6106.
17

COUNT FOUR

18
19 5. Respondent does not contest the allegations contained in lines 4 through the word
20 “CTA” found at line 14 of paragraph 5 on page 5 of the Notice. Respondent denies the
21 reaminader of that paragraph and denies that he willfully violated Business and Professions Code
22 Section 6068(a).
23

COUNT FIVE

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25 6. Respondent does not contest he issued the checks in question but denies that the same

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were issued in willful violation of Rule of Professional Conduct 4-100(A)

DATED: May 10, 2016



MICHAEL E. WINE,
Attorney for Respondent

PROOF OF SERVICE BY MAIL

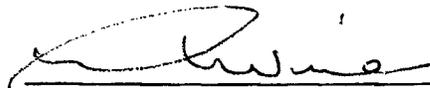
I, MICHAEL E. WINE, declare as follows:

I am over the age of eighteen years and not a party to this action. My business address is 80 W. Sierra Madre Blvd., #355, Sierra Madre, CA 91024. I am readily familiar with the practice of my law office for the collection and processing of mail with the United States Postal Service. Pursuant to that practice, envelopes placed for collection at designated locations are deposited with the United States Postal Service with first class postage thereon fully prepaid that same day in the ordinary course of business. On May 10, 2016 I served the RESPONSE TO NOTICE OF DISCIPLINARY CHARGES to which this is attached by a placing a true copy thereof in an envelope addressed to each of the persons named below at the address as follows:

Charles Calix, Esq.
State Bar of California
Office of the Chief Trial Counsel
845 S. Figueroa Street
Los Angeles, CA 90017

and then by sealing and placing the envelope for collection at Sierra Madre, CA on the above date.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on May 10, 2016 at Sierra Madre, CA.



MICHAEL E. WINE