

1 James I. Ham (SBN 100849)
2 Ellen A. Pansky (SBN 77688)
3 **PANSKY MARKLE HAM LLP**
4 1010 Sycamore Ave., Suite 308
5 South Pasadena, CA. 91030
6 Telephone: (213) 626-7300
7 Facsimile: (213) 626-7330

8 Attorneys for Respondent
9 David Andrew Seeley

FILED
JUN 20 2013
STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

10 BEFORE THE STATE BAR COURT
11 OF THE STATE OF CALIFORNIA
12 HEARING DEPARTMENT – LOS ANGELES

13 In The Matter of) Case No. 15-O-15177 & 16-H-10397
14 DAVID ANDREW SEELEY,)
15 Member No. 78089,)
16 A Member of the State Bar.)

**RESPONSE TO NOTICE OF
DISCIPLINARY CHARGES**



1 TO THE OFFICE OF THE CHIEF TRIAL COUNSEL OF THE STATE BAR OF
2 CALIFORNIA AND TO ITS COUNSEL OF RECORD:

3
4 Respondent David Andrew Seeley responds to the Notice of Disciplinary Charges as
5 follows:

6
7 **Answer to Specific Allegations Contained in the Notice of Disciplinary Charges**

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9 1. Respondent admits that he was admitted to the practice of law in the State of
10 California on December 21, 1977, was a member at all times pertinent to the charges, and is
11 currently a member of the State Bar of California.

12
13 2. Respondent objects to the allegation in Paragraph 2 which constitutes a legal
14 conclusion and, without waiving this objection, denies that he committed acts in willful violation of
15 Business & Professions Code Section 6068(a).

16
17 3. Respondent objects to the allegations of paragraph 3 of the NDC because they are
18 conclusory, compound and intertwined with legal conclusions. Without waiving this objection,
19 Respondent denies that he committed acts involving moral turpitude in willful violation of Business
& Professions Code Section 6106.

20
21 4. Respondent objects to the allegations of paragraph 4 on the grounds that they are
22 vague, compound and ambiguous. Without waiving this objection, Respondent denies that he
willfully violated Rule 1-110.

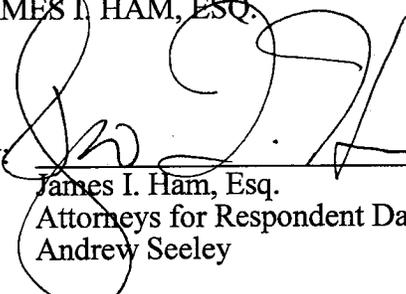
23
24 5. Respondent objects to the allegations of paragraph 5 of the NDC because they are
25 conclusory, compound and intertwined with legal conclusions. Without waiving this objection,
26 Respondent denies that he committed acts involving moral turpitude in willful violation of Business
& Professions Code Section 6106.

1 required by law, then no discipline should be imposed because Respondent self-reported the filings.
2 Discipline is not required because it is not needed to protect the public, Respondent self-reported, the
3 conduct did not harm any client, and the conduct was not inherently wrongful.
4

5 WHEREFORE, Respondent prays that the Court find that Respondent did not commit acts
6 constituting professional misconduct, and that the Notice of Disciplinary Charges be dismissed.
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8
9 Dated: June 20, 2016

PANSKY MARKLE HAM LLP
JAMES I. HAM, ESQ.

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11
12 By  _____

13 James I. Ham, Esq.
14 Attorneys for Respondent David
15 Andrew Seeley
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PROOF OF SERVICE

In the Matter of David Andrew Seeley

I declare that I am over the age of eighteen (18) and not a party to this action. My business address is 1010 Sycamore Ave., Suite 308, South Pasadena, California 91030.

On **June 20, 2016**, I served the foregoing document(s) described as:

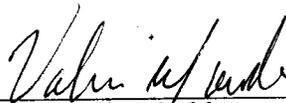
RESPONSE TO NOTICE OF DISCIPLINARY CHARGES

on all interested parties in this action by placing a true copy of each document, enclosed in a sealed envelope addressed as follows:

R. Kevin Bucher, Deputy Trial Counsel
Office of the Chief Trial Counsel
Enforcement
The State Bar of California
845 Figueroa Street
Los Angeles, CA 90017

BY PERSONAL SERVICE: I personally delivered such envelope addressed to R. Kevin Bucher to the California State Bar reception desk, on June 20, 2016.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed June 20, 2016 at Los Angeles, California.



Valerie Markle