

1 Ellen A. Pansky (SBN 77688)  
2 Art Barsegyan (SBN 279064)  
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

**FILED**  
**SEP 08 2016**  
**STATE BAR COURT**  
**CLERK'S OFFICE**  
**LOS ANGELES**

6 Attorneys for Respondent  
7 Thomas P. Brown, IV

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

12 In the Matter of )  
13 THOMAS PATRICK BROWN IV, )  
14 Member No. 97315, )  
15 )  
16 A Member of the State Bar. )  
17 )  
18 )  
19 )  
20 )  
21 )  
22 )  
23 )  
24 )  
25 )  
26 )  
27 )  
28 )

Case No. 15-O-15428  
**RESPONSE TO NOTICE OF  
DISCIPLINARY CHARGES**



1 Respondent Thomas P. Brown, IV responds to the Notice of Disciplinary Charges as  
2 follows:

3  
4 **Answer to Specific Allegations Contained in the Notice of Disciplinary Charges**

5  
6 1. Respondent admits that he was admitted to the practice of law in the State of  
7 California on January 21, 1981, and that he has been a member of the State Bar of California since  
8 that time.

9  
10 **COUNT ONE**

11 2. Respondent objects to the allegations of paragraph 2 of the NDC because they are  
12 conclusory, compound and intertwined with legal conclusions. Without waiving this objection,  
13 Respondent admits that on October 19 and 20, 2015, he represented a client in depositions in a  
14 matter titled *Dennis G. Torres v. MEDG, Inc dba Fashion Cleaners*, LASC No. BC506812, before  
15 he had any actual knowledge that the effective date of his actual suspension from practice had  
16 occurred in Supreme Court Case No. S226855 and he had a good faith, reasonable belief that his  
17 law license was active when he appeared at the depositions.

18  
19 **COUNT TWO**

20 3. Respondent objects to the allegations of paragraph 3 of the NDC because they are  
21 conclusory, compound and intertwined with legal conclusions. Without waiving the objection,  
22 Respondent admits in part and denies in part. Respondent admits that that on October 19 and 20,  
23 2015, he represented a client in depositions in a matter titled *Dennis G. Torres v. MEDG, Inc dba*  
24 *Fashion Cleaners*, LASC No. BC506812. Respondent denies that he knew or was grossly negligent  
25 in not knowing that his disciplinary suspension in Supreme Court Case No. S226855 had taken  
26 effect on October 11, 2015 and thus, denies that he committed acts involving moral turpitude,  
27 dishonesty or corruption in willful violation of Business and Professions Code section 6106.





**PROOF OF SERVICE**

*In the Matter of Thomas Patrick Brown IV*

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 September 7, 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:

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

(X) **BY MAIL:** as follows: I am "readily familiar" with the firm's practice of collection and processing of correspondence for mailing with the United States Postal Service. I know that the correspondence was deposited with the United States Postal Service on the same day this declaration was executed in the ordinary course of business. I know that the envelope was sealed and, with postage thereon fully prepaid, placed for collection and mailing on this date in the United States mail at South Pasadena, California.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed September 7, 2016 at South Pasadena, California.



\_\_\_\_\_  
Valerie Markle