

1 DEAN R. ZIMMERMAN (SBN 249023)
2 360 S. Westlake Ave.
3 LOS ANGELES, CA 90057
4 Telephone: (949) 324-8681

5 DEAN R. ZIMMERMAN, IN PRO PER

FILED

SEP 14 2016

STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

6
7 IN THE STATE BAR COURT OF THE STATE BAR OF CALIFORNIA

8 IN THE MATTER OF THE
9 CONVICTION OF:

10 **DEAN RANDOLPH ZIMMERMAN**

11 **No. 249023,**

12 A Member of the State Bar.

Case No. 16-C-11031-WKM

RESPONSE TO NOTICE OF HEARING AND
INITIATING DOCUMENT RE
TRANSMITTAL OF RECORDS OF
CONVICTION OF ATTORNEY

13
14 TO THE CLERK OF THE STATE BAR COURT:

15 I. GENERAL/SPECIFIC DENIAL

16 Respondent Member DEAN R. ZIMMERMAN makes a general denial that the allegations in the
17 Transmittal of Records of Conviction of Attorney are alleged Crimes which involve moral
18 turpitude or constitute other misconduct warranting discipline. Respondent makes the following
19 specific denials:

- 20 1. Violation of Penal Code Section 32310(a) (Manufacturing, Importing, Keeping for Sale,
21 Giving or Receiving a Large-Capacity Magazine), a felony, was not a crime involving
22 moral turpitude or other conduct warranting discipline;
- 23 2. Violation of Vehicle Code Sections 23152(a) & 23546 (Driving under the influence of
24 Alcohol/Drugs within 10 Years of Two Other DUI Offenses), a misdemeanor, was not a
25 crime involving moral turpitude or other conduct warranting discipline.

26 II. SEPARATE AFFIRMATIVE DEFENSES



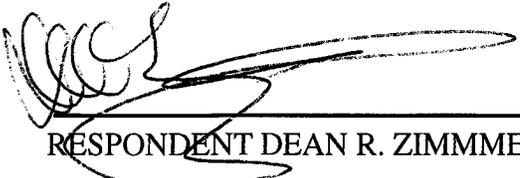
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1. MENTAL HEALTH CONDITION – at the time of the alleged misconduct and/or alleged acts, Respondent was suffering from a mental health condition that temporarily limited or barred any or some culpability. This mental health condition causally contributed to the alleged misconduct and, respectfully, also constitutes a mitigating circumstance in a determination of any potential administrative penalties affecting State Bar Membership.
2. SUBSTANCE ABUSE CONDITION – at the time of the alleged misconduct and/or alleged acts, Respondent was suffering from a substance abuse issue that temporarily limited or barred any or some culpability. This substance abuse issue causally contributed to the alleged misconduct and, respectfully, also constitutes a mitigating circumstance in a determination of any potential administrative penalties affecting State Bar Membership.

III. REQUEST FOR REFERRAL TO ALTERNATIVE DISCIPLINE PROGRAM

1. On August 5, 2016, Respondent was referred to the Alternative Discipline Program (Case No. 15-C-15579-WKM).
2. Respondent Member contends that the above case is also a good candidate, pursuant to Rule 5.380, et seq., for referral to the Alternative Discipline Program because there is a causal connection between Respondent Member’s Mental Health and Substance Abuse Issues, and the misconduct alleged in this case. Prior to the period of alleged misconduct, Respondent Member, to his knowledge, had had no prior State Bar complaints.
3. For the above reasons, Respondent Respectfully requests administrative review of the appropriateness of his referral to the ADP Program.

Date: September 14, 2016


RESPONDENT DEAN R. ZIMMERMANN

PROOF OF SERVICE

I, Dean R. Zimmerman, am over the age of 18 and am a party to this action. I am a resident of or employed in the county where the mailing occurred; my business address is: 360 S. Westlake Ave. Los Angeles, CA 90057

On September 14, 2016, I served the foregoing document(s) described as:

RESPONSE TO NOTICE OF HEARING AND INITIATING DOCUMENT RE
TRANSMITTAL OF RECORDS OF CONVICTION OF ATTORNEY **16-C-11031-
WKM**

to the following parties:

CLERK OF THE STATE BAR
STATE BAR OF CALIFORNIA
845 S. Figueroa St.
Los Angeles, CA 90017

ALEX HACKERT
DEPUTY PROSECUTOR
STATE BAR OF CALIFORNIA
845 S. Figueroa St.
Los Angeles, CA 90017

(By U.S. Mail) I deposited such envelope in the mail at: Los Angeles, California with postage thereon fully prepaid. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

(By Personal Service) I caused such envelope to be delivered by hand via messenger service to the address above;

(By Facsimile) I served a true and correct copy by facsimile during regular business hours to the number(s) listed above. Said transmission was reported complete and without error.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATED: 9/14/16



DEAN R. ZIMMERMAN