

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. 16-O-10248

8 2. Respondent objects to the allegations of Paragraph 2 of the NDC because they are
9 conclusory, compound, and intertwined with legal conclusions. Notwithstanding said objection:

- 10 a. Respondent admits the allegations contained in Paragraph 2 Subsection A of the
11 NDC insofar as they allege that Respondent failed to “timely” submit the reports
12 referred to therein. However, Respondent denies that he failed to submit the
13 reports.
- 14 b. Respondent admits the allegations contained in Paragraph 2 Subsection B of the
15 NDC insofar as they allege that Respondent failed to “timely” submit the
16 certificates referred to therein. However, Respondent denies that he failed to
17 submit the certificates.
- 18 c. Respondent denies the allegations contained in Paragraph 2 Subsection C of the
19 NDC.

20 **AFFIRMATIVE DEFENSES**

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22 **FIRST AFFIRMATIVE DEFENSE**

23 (Failure to State Sufficient Facts)

24 The Notice of Disciplinary Charges, and each of its purported counts, fails to state facts
25 sufficient to state a basis for discipline.

26 **SECOND AFFIRMATIVE DEFENSE**

27 (Lack of Materiality)

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1 The facts on which some or all of the Notice of Disciplinary Charges are based allege
2 immaterial or irrelevant omissions or statements.

3 **THIRD AFFIRMATIVE DEFENSE**

4 (Charges Do Not Constitute Willful Misconduct)

5 The facts on which some or all of the Notice of Disciplinary Charges are based constitute
6 mistake, inadvertence, neglect, or error and do not rise to the level of willful misconduct.

7 **FOURTH AFFIRMATIVE DEFENSE**

8 (No Actual Injury)

9 The facts on which some or all of the Notice of Disciplinary Charges are based do not allege
10 any actual injury by reason of Respondent's acts, conduct, or omissions.

11 **FIFTH AFFIRMATIVE DEFENSE**

12 (Third Party Acts)

13 The facts on which some or all of the Notice of Disciplinary Charges are based and any
14 damages therefrom, if any, are attributable to acts of third parties.

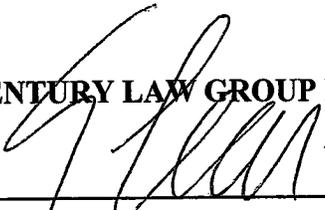
15 **SIXTH AFFIRMATIVE DEFENSE**

16 (Laches)

17 Some or all of the allegations contained in the Notice of Disciplinary Charges have been
18 brought only after unjustifiable delay, which delay has prejudiced the rights of Respondent, and
19 therefore, such allegations should be barred under the Doctrine of Laches.

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24 DATED: July 11, 2016

CENTURY LAW GROUP LLP



Edward O. Lear
Attorney for Respondent
Ronald Edward Faulk

DECLARATION OF SERVICE BY PERSONAL SERVICE

Re: In the matter of Ronald Faulk

No.: 16-O-10248

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.

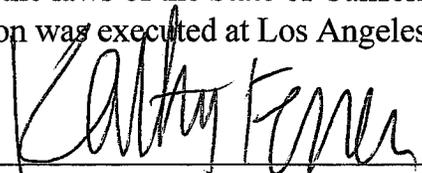
On July 11, 2016 I caused to be personally serve, the attached:

ANSWER TO THE NOTICE OF DISCIPLINARY CHARGES

on:

Jaime Kim Deputy Trial Counsel 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 July 11, 2016.


Kathy Ferrera