

1 Anthony Radogna, Bar #261859  
2 Law Offices of Anthony Radogna  
3 1 Park Plaza, Suite 600  
4 Irvine, CA 92614  
5 P (949) 852-7312

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8 Counsel for Respondent

**FILED**

**JAN -5 2017**

STATE BAR COURT  
CLERK'S OFFICE  
LOS ANGELES

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**THE STATE BAR COURT  
OF THE STATE BAR OF CALIFORNIA  
HEARING DEPARTMENT- LOS ANGELES**

IN THE MATTER OF  
ANTHONY OBEHI EGBASE,  
Member No. 181721,  
  
A Member of the State Bar

) Case No. : 16-O-11019

) **RESPONSE:**

) **NOTICE OF  
DISCIPLINARY CHARGES**

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

ANTHONY OBEHI EGBASE (Respondent), by and through his attorney of record  
herein, Law Offices of Anthony Radogna, hereby responds to the Notice of Disciplinary Charges  
filed January 4, 2017 as follows below.

**JURISDICTION**

1. Responding to paragraph 1 of the Notice of Disciplinary Charges, Respondent  
admits the allegations stated in that paragraph.

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1                                    **COUNT ONE**

2            2.        Responding to paragraph 2 of the Notice of Disciplinary Charges, Respondent  
3 denies the allegations and assumptions stated in that paragraph.

4                                    **COUNT TWO**

5            3.        Responding to paragraph 3 of the Notice of Disciplinary Charges, Respondent  
6 denies the allegations and assumptions stated in that paragraph.

7                                    **COUNT THREE**

8            4.        Responding to paragraph 4 of the Notice of Disciplinary Charges, Respondent  
9 denies the allegations stated in that paragraph.

10                                  **COUNT FOUR**

11           5.        Responding to paragraph 5 of the Notice of Disciplinary Charges, Respondent  
12 denies the allegations stated in that paragraph.

13                                  **COUNT FIVE**

14           6.        Responding to paragraph 6 of the Notice of Disciplinary Charges, Respondent  
15 denies the allegations stated in that paragraph.

16                                  **AFFIRMATIVE DEFENSES**

17           1.        The Notice of Disciplinary Charges and every count in it, fails to plead a  
18 disciplinable offense.

19           2.        Count 1,2,3,4, and 5 fails to contain facts, in concise and ordinary language,  
20 comprising the violations in sufficient detail to permit the preparation of a defense as required by  
21 rule 5.41(B)(2), Rules of Procedure of the State Bar of California.

22           3.        Counts 1, 2, 3, 4, and 5 fail to provide adequate notice of the conduct alleged to  
23 violate the rule and fail to relate stated facts to rules allegedly violated as required by rule  
24 5.41(B)(3), Rules of Procedure of the State Bar of California and applicable case law (*In the*  
25 *Matter of Glasser* (Review Dept 1990) 1 Cal. State Bar Ct. Rptr. 163; *In the Matter of Varakin*  
26 (Review Dept. 1994) 3 Cal. State Bar Ct. Rptr. 179.)  
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Respectfully submitted,

Dated: January 4, 2017

LAW OFFICES OF ANTHONY RADOGNA



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Anthony Radogna Esq.  
Counsel for Respondent

## DECLARATION OF SERVICE

I, the undersigned, over the age of eighteen, declare that ☒ I am / ☐ am not a party to the within action, in the City and County of Los Angeles, on 1-5-17, served the following document(s):

Response to NDC

☒ by personal delivery:

Interoffice Mail  
DTC Brand Comm  
845 South Figueroa  
Los Angeles, CA

☐ other:

I declare under penalty of perjury at Los Angeles, California, on the date shown below, that the foregoing is true and correct.

Dated: 1-5-17

