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FILED

NOV 14 2012

STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

8 THE STATE BAR COURT
9 HEARING DEPARTMENT - LOS ANGELES

10 In the Matter of) Case Nos.: 11-O-18390;
11) 11-O-18575; 11-O-18719;
12) 11-O-18819; 11-O-19467;
13 STEPHEN LYSTER SIRINGORINGO,) 11-O-19573; 12-O-10073;
14 Respondent) 12-O-10594; 12-O-10937;
15 No. 264161) 12-O-12152; 12-O-12162;
16) 12-O-12421; 12-O-12812;
17) 12-O-12832; 12-O-13035;
18) 12-O-13419; 12-O-13881;
19) 12-O-14080; 12-O-14514;
20) 12-O-14632
21 A Member of the State Bar)
22)
23)
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RESPONDENT'S ANSWER TO NOTICE
OF DISCIPLINARY CHARGES

20 TO THE HONORABLE RICHARD A. HONN, JUDGE OF THE STATE BAR
21 COURT OF THE STATE BAR OF CALIFORNIA, AND TO THE OFFICE OF THE
22 CHIEF TRIAL COUNSEL OF THE STATE BAR OF CALIFORNIA:

23 Pursuant to Rule 5.43 of the Rules of Procedure of the
24 State Bar of California, Respondent Stephen Lyster Siringoringo,
25 by and through his attorney(s) of record, hereby submits the
26 following in response to the Notice of Disciplinary Charges
27 (hereinafter "NDC") on file herein:
28

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1 Under the provisions of the Rules of Procedure of the
2 State Bar of California, Respondent Stephen Lyster Siringoringo
3 hereby generally denies each and every allegation of the NDC and
4 the whole thereof and further denies the Respondent has violated
5 any Rule of Professional Conduct in any manner whatsoever. In
6 response to the specific allegations set forth in the NDC on
7 file herein, Respondent Stephen Lyster Siringoringo asserts:

8 1. In response to Paragraph 1 of the NDC, Respondent
9 admits said allegations for jurisdictional purposes only.

10
11 Case No. 11-O-18390

12 2. In response to Paragraph 2 of the NDC, Respondent
13 denies said allegations.

14 3. In response to Paragraph 3 of the NDC, Respondent
15 admits said allegations.

16 4. In response to Paragraph 4 of the NDC, Respondent denies
17 said allegations.

18 5. In response to Paragraph 5 of the NDC, Respondent
19 denies said allegations.

20 6. In response to Paragraph 6 of the NDC, Respondent
21 denies said allegations.

22 7. In response to Paragraph 7 of the NDC, Respondent
23 denies said allegations.

24
25 Case No. 11-O-18390

26 Count Two

27 8. In response to Paragraph 8 of the NDC, Respondent
28 denies said allegations.

1 9. In response to Paragraph 9 of the NDC, Respondent
2 admits said allegations.

3 10. In response to Paragraph 10 of the NDC, Respondent
4 denies said allegations.

5 11. In response to Paragraph 11 of the NDC, Respondent
6 denies said allegations.

7 12. In response to paragraph 12 of the NDC, Respondent
8 denies said allegations on information and belief.

9 13. In response to Paragraph 13 of the NDC, Respondent
10 denies said allegations.

11 14. In response to paragraph 14 of the NDC, Respondent
12 denies said allegations.

13 15. In response to paragraph 15 of the NDC, Respondent
14 denies said allegations.

15
16 Case No. 11-O-18719

17 Count Three

18 16. In response to paragraph 16 of the NDC, Respondent
19 denies said allegations.

20 17. In response to paragraph 17 of the NDC, Respondent
21 admits said allegations.

22 18. In response to paragraph 18 of the NDC, Respondent
23 denies said allegations.

24 19. In response to paragraph 19 of the NDC, Respondent
25 denies said allegations.

26 20. In response to paragraph 20 of the NDC, Respondent
27 denies said allegations.

28 21. In response to paragraph 21 of the NDC, Respondent
denies said allegations.

1 22. In response to paragraph 22 of the NDC, Respondent
2 denies said allegations.

3 23. In response to paragraph 23 of the NDC, Respondent
4 denies said allegations.

5
6 Case No. 11-O-18819

7 Count Four

8 24. In response to paragraph 24 of the NDC, Respondent
9 denies said allegations.

10 25. In response to paragraph 25 of the NDC, Respondent
11 admits said allegations.

12 26. In response to paragraph 26 of the NDC, Respondent
13 denies said allegations.

14 27. In response to paragraph 27 of the NDC, Respondent
15 denies said allegations.

16 28. In response to paragraph 28 of the NDC, Respondent
17 denies said allegations.

18 29. In response to paragraph 29 of the NDC, Respondent
19 denies said allegations.

20 30. In response to paragraph 30 of the NDC, Respondent
21 denies said allegations.

22 31. In response to paragraph 31 of the NDC, Respondent
23 denies said allegations.

24
25 Case No. 11-O-19467

26 Count Five

27 32. In response to paragraph 32 of the NDC, Respondent
28 denies said allegations.

1 33. In response to paragraph 33 of the NDC, Respondent
2 admits said allegations.

3 34. In response to paragraph 34 of the NDC, Respondent
4 denies said allegations.

5 35. In response to paragraph 35 of the NDC, Respondent
6 denies said allegations.

7 36. In response to paragraph 36 of the NDC, Respondent
8 denies said allegations.

9 37. In response to paragraph 37 of the NDC, Respondent
10 denies said allegations.

11 38. In response to paragraph 38 of the NDC, Respondent
12 denies said allegations.

13 39. In response to paragraph 39 of the NDC, Respondent
14 denies said allegations.

15
16 Case No. 11-O-19573

17 Count Six

18 40. In response to paragraph 40 of the NDC, Respondent
19 denies said allegations.

20 41. In response to paragraph 41 of the NDC, Respondent
21 admits said allegations.

22 42. In response to paragraph 42 of the NDC, Respondent
23 denies said allegations.

24 43. In response to paragraph 43 of the NDC, Respondent
25 denies said allegations.

26 44. In response to paragraph 44 of the NDC, Respondent
27 denies said allegations.

28 45. In response to paragraph 45 of the NDC, Respondent
denies said allegations.

1 Case No. 12-O-10073

2 Count Seven

3 46. In response to paragraph 46 of the NDC, Respondent
4 denies said allegations.

5 47. In response to paragraph 47 of the NDC, Respondent
6 admits said allegations.

7 48. In response to paragraph 48 of the NDC, Respondent
8 denies said allegations.

9 49. In response to paragraph 49 of the NDC, Respondent
10 denies said allegations.

11 50. In response to paragraph 50 of the NDC, Respondent
12 denies said allegations.

13 51. In response to paragraph 51 of the NDC, Respondent
14 denies said allegations

15
16 Case No. 12-O-10594

17 Count Eight

18 52. In response to paragraph 52 of the NDC, Respondent
19 denies said allegations.

20 53. In response to paragraph 52 of the NDC, Respondent
21 admits said allegations.

22 54. In response to paragraph 54 of the NDC, Respondent
23 denies said allegations.

24 55. In response to paragraph 55 of the NDC, Respondent
25 denies said allegations.

26 56. In response to paragraph 56 of the NDC, Respondent
27 denies said allegations.

28 57. In response to paragraph 57 of the NDC, Respondent
denies said allegations

1 Case No. 12-0-10937

2 Count Nine

3 58. In response to paragraph 58 of the NDC, Respondent
4 denies said allegations.

5 59. In response to paragraph 59 of the NDC, Respondent
6 admits said allegations.

7 60. In response to paragraph 60 of the NDC, Respondent
8 denies said allegations.

9 61. In response to paragraph 61 of the NDC, Respondent
10 denies said allegations.

11 62. In response to paragraph 62 of the NDC, Respondent
12 denies said allegations.

13 63. In response to paragraph 63 of the NDC, Respondent
14 denies said allegations.

15 64. In response to paragraph 64 of the NDC, Respondent
16 denies said allegations.

17 65. In response to paragraph 65 of the NDC, Respondent
18 denies said allegations.

19 66. In response to paragraph 66 of the NDC, Respondent
20 denies said allegations.

21
22 Case No. 12-0-12152

23 Count Ten

24 67. In response to paragraph 67 of the NDC, Respondent
25 denies said allegations.

26 68. In response to paragraph 68 of the NDC, Respondent
27 admits said allegations.

1 69. In response to paragraph 69 of the NDC, Respondent
2 denies said allegations.

3 70. In response to paragraph 70 of the NDC, Respondent
4 denies said allegations.

5 71. In response to paragraph 71 of the NDC, Respondent
6 denies said allegations.

7 72. In response to paragraph 72 of the NDC, Respondent
8 denies said allegations on information and belief.

9 73. In response to paragraph 73 of the NDC, Respondent
10 denies said allegations.

11 74. In response to paragraph 74 of the NDC, Respondent
12 denies said allegations.

13
14 Case No. 12-O-12162

15 Count Eleven

16 75. In response to paragraph 75 of the NDC, Respondent
17 denies said allegations.

18 76. In response to paragraph 76 of the NDC, Respondent
19 admits said allegations.

20 77. In response to paragraph 77 of the NDC, Respondent
21 denies said allegations.

22 78. In response to paragraph 78 of the NDC, Respondent
23 denies said allegations.

24 79. In response to paragraph 79 of the NDC, Respondent
25 denies said allegations.

26 80. In response to paragraph 80 of the NDC, Respondent
27 denies said allegations.

28 81. In response to paragraph 81 of the NDC, Respondent
denies said allegations.

1 Case No. 12-O-12421

2 Count Twelve

3 82. In response to paragraph 82 of the NDC, Respondent
4 denies said allegations.

5 83. In response to paragraph 83 of the NDC, Respondent
6 admits said allegations.

7 84. In response to paragraph 84 of the NDC, Respondent
8 denies said allegations.

9 85. In response to paragraph 85 of the NDC, Respondent
10 denies said allegations.

11 86. In response to paragraph 86 of the NDC, Respondent
12 denies said allegations.

13 87. In response to paragraph 87 of the NDC, Respondent
14 denies said allegations.

15 88. In response to paragraph 88 of the NDC, Respondent
16 denies said allegations.

17
18 Case No. 12-O-12812

19 Count Thirteen

20 89. In response to paragraph 89 of the NDC, Respondent
21 denies said allegations.

22 90. In response to paragraph 90 of the NDC, Respondent
23 admits said allegations.

24 91. In response to paragraph 91 of the NDC, Respondent
25 denies said allegations.

26 92. In response to paragraph 92 of the NDC, Respondent
27 denies said allegations.

28 93. In response to paragraph 93 of the NDC, Respondent
denies said allegations.

1 94. In response to paragraph 94 of the NDC, Respondent
2 denies said allegations.

3
4 Case No. 12-O-12832

5 Count Fourteen

6 95. In response to paragraph 95 of the NDC, Respondent
7 denies said allegations.

8 96. In response to paragraph 96 of the NDC, Respondent
9 admits said allegations.

10 97. In response to paragraph 97 of the NDC, Respondent
11 denies said allegations.

12 98. In response to paragraph 98 of the NDC, Respondent
13 denies said allegations.

14 99. In response to paragraph 99 of the NDC, Respondent
15 denies said allegations.

16 100. In response to paragraph 100 of the NDC, Respondent
17 denies said allegations.

18 101. In response to paragraph 101 of the NDC, Respondent
19 denies said allegations.

20
21 Case No. 12-O-13035

22 Count Fifteen

23 102. In response to paragraph 102 of the NDC, Respondent
24 denies said allegations.

25 103. In response to paragraph 103 of the NDC, Respondent
26 admits said allegations.

27 104. In response to paragraph 104 of the NDC, Respondent
28 denies said allegations.

1 105. In response to paragraph 105 of the NDC, Respondent
2 denies said allegations.

3 106. In response to paragraph 106 of the NDC, Respondent
4 denies said allegations.

5 107. In response to paragraph 107 of the NDC, Respondent
6 denies said allegations.

7
8 Case No. 12-O-13419

9 Count Sixteen

10 108. In response to paragraph 108 of the NDC, Respondent
11 denies said allegations.

12 109. In response to paragraph 109 of the NDC, Respondent
13 admits said allegations.

14 110. In response to paragraph 110 of the NDC, Respondent
15 denies said allegations.

16 111. In response to paragraph 111 of the NDC, Respondent
17 denies said allegations.

18 112. In response to paragraph 112 of the NDC, Respondent
19 denies said allegations.

20 113. In response to paragraph 113 of the NDC, Respondent
21 denies said allegations.

22
23 Case No. 12-O-13881

24 Count Seventeen

25 114. In response to paragraph 114 of the NDC, Respondent
26 denies said allegations.

27 115. In response to paragraph 115 of the NDC, Respondent
28 admits said allegations.

1 116. In response to paragraph 116 of the NDC, Respondent
2 denies said allegations.

3 117. In response to paragraph 117 of the NDC, Respondent
4 denies said allegations.

5 118. In response to paragraph 118 of the NDC, Respondent
6 denies said allegations.

7 119. In response to paragraph 119 of the NDC, Respondent
8 denies said allegations.

9
10 Case No. 12-O-14080

11 Count Eighteen

12 120. In response to paragraph 120 of the NDC, Respondent
13 denies said allegations.

14 121. In response to paragraph 121 of the NDC, Respondent
15 admits said allegations.

16 122. In response to paragraph 122 of the NDC, Respondent
17 denies said allegations.

18 123. In response to paragraph 123 of the NDC, Respondent
19 denies said allegations.

20 124. In response to paragraph 124 of the NDC, Respondent
21 denies said allegations

22 125. In response to paragraph 125 of the NDC, Respondent
23 denies said allegations.

24 126. In response to paragraph 126 of the NDC, Respondent
25 denies said allegations.

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1 Case No. 12-O-14514

2 Count Nineteen

3 127. In response to paragraph 127 of the NDC, Respondent
4 denies said allegations.

5 128. In response to paragraph 128 of the NDC, Respondent
6 admits said allegations.

7 129. In response to paragraph 129 of the NDC, Respondent
8 denies said allegations.

9 130. In response to paragraph 130 of the NDC, Respondent
10 denies said allegations.

11 131. In response to paragraph 131 of the NDC, Respondent
12 denies said allegations.

13 132. In response to paragraph 132 of the NDC, Respondent
14 denies said allegations.

15 133. In response to paragraph 133 of the NDC, Respondent
16 denies said allegations.

17 134. In response to paragraph 134 of the NDC, Respondent
18 denies said allegations.

19
20 Case No. 12-O-14632

21 Count Twenty

22 135. In response to paragraph 135 of the NDC, Respondent
23 denies said allegations.

24 136. In response to paragraph 136 of the NDC, Respondent
25 admits said allegations.

26 137. In response to paragraph 137 of the NDC, Respondent
27 denies said allegations.

28 138. In response to paragraph 138 of the NDC, Respondent
denies said allegations.

1 139. In response to paragraph 139 of the NDC, Respondent
2 denies said allegations.

3 140. In response to paragraph 140 of the NDC, Respondent
4 denies said allegations.

5 141. In response to paragraph 141 of the NDC, Respondent
6 denies said allegations.

7 142. In response to paragraph 142 of the NDC, Respondent
8 denies said allegations.

9 143. In response to paragraph 143 of the NDC, Respondent
10 denies said allegations.

11 144. In response to paragraph 144 of the NDC, Respondent
12 denies said allegations.

13
14 Count Twenty-One

15 Case Nos. 11-O-18390; 11-O-18575; 11-O-18719; 11-O-18819;
16 11-O-19467; 11-O-19573; 12-O-10073; 12-O-10594;
17 12-O-10937; 12-O-12152; 12-O-12162; 12-O-12421;
18 12-O-12812; 12-O-13035; 12-O-13419; 12-O-13881;
19 12-O-14080; 12-O-14514; 12-O-14632; 12-O-12832

20 145. In response to paragraph 145 of the NDC, Respondent
21 denies said allegations.

22 146. In response to paragraph 146 of the NDC, Respondent
23 admits said allegations on information and belief.

24 147. In response to paragraph 147 of the NDC, Respondent
25 denies said allegations on information and belief.

26 148. In response to paragraph 148 of the NDC, Respondent
27 denies said allegations.

28 149. In response to paragraph 149 of the NDC, Respondent
denies said allegations.

1 150. In response to paragraph 150 of the NDC, Respondent
2 denies said allegations.

3
4 COUNT TWENTY-TWO

5 151. In response to paragraph 151 of the NDC, Respondent
6 denies said allegations.

7 152. In response to paragraph 152 of the NDC, the responses
8 to Counts One through Twenty-One are incorporated by reference.

9 153. In response to paragraph 153 of the NDC, Respondent
10 denies said allegations.

11 154. In response to paragraph 154 of the NDC, Respondent
12 denies said allegations on information and belief.

13 155. In response to paragraph 155 of the NDC, Respondent
14 denies said allegations on information and belief.

15 156. In response to paragraph 156, Respondent denies said
16 allegations on information and belief.

17 157. In response to paragraph 157 of the NDC, Respondent
18 denies said allegation on information and belief.

19 158. In response to paragraph 158, Respondent can neither
20 admit nor deny said allegations.

21 159. In response to paragraph 159 of the NDC, Respondent
22 denies said allegations on information and belief.

23 160. In response to paragraph 160 of the NDC, Respondent
24 denies said allegations.

25
26 Count Twenty-Three

27 161. In response to paragraph 160 of the NDC, Respondent
28 denies said allegations.

1 162. In response to paragraph 162 of the NDC, the responses
2 to Counts one through Twenty-Two are incorporated by reference.

3 163. In response to paragraph 163 of the NDC, Respondent
4 denies said allegations.

5 164. In response to paragraph 164 of the NDC, Respondent
6 denies said allegations.

7 165. In response to paragraph 165 of the NDC, Respondent can
8 neither admit nor deny said allegations.

9 166. In response to paragraph 166, Respondent can neither
10 admit nor deny said allegations.

11 167. In response to paragraph 167 of the NDC, Respondent
12 denies said allegations on information and belief.

13 168. In response to paragraph 168 of the NDC, Respondent can
14 neither admit nor deny said allegations.

15 169. In response to paragraph 169 of the NDC, Respondent
16 denies said allegations.

17 170. In response to paragraph 170 of the NDC, Respondent
18 denies said allegations.

19 171. In response to paragraph 171 of the NDC, Respondent
20 denies said allegations.

21 172. In response to paragraph 172 of the NDC, Respondent
22 denies said allegations.

23 173. In response to paragraph 173 of the NDC, Respondent
24 denies said allegations.

25 174. In response to paragraph 174 of the NDC, Respondent
26 denies said allegations.

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28 ///

1 Count Twenty-Four

2 175. In response to paragraph 175 of the NDC, Respondent
3 denies said allegations.

4 176. In response to paragraph 176 of the NDC, the responses
5 to Counts One through Twenty-Three are incorporated by
6 reference.

7 177. In response to paragraph 177 of the NDC, Respondent
8 admits said allegations.

9 178. In response to paragraph 178 of the NDC, Respondent
10 denies said allegations.

11 179. In response to paragraph 179 of the NDC, Respondent can
12 neither admit nor deny said allegations.

13 180. In response to paragraph 180 of the NDC, Respondent can
14 neither admit nor deny said allegations.

15 181. In response to paragraph 181 of the NDC, Respondent
16 denies said allegations.

17 182. In response to paragraph 182 of the NDC, Respondent
18 denies said allegations.

19
20 Count Twenty-Five

21 183. In response to paragraph 183 of the NDC, Respondent
22 denies said allegations.

23 184. In response to paragraph 184 of the NDC, the responses
24 to Counts One through Twenty-four are incorporated by reference.

25 185. In response to paragraph 185 of the NDC, Respondent
26 denies said allegations.

27 186. In response to paragraph 186 of the NDC, Respondent
28 denies said allegations.

1 187. In response to paragraph 187 of the NDC, Respondent
2 denies said allegations.
3

4
5 Dated: November 14, 2012

6 Respectfully submitted,
7 CENTURY LAW GROUP

8 By: Paul J. Virgo
9 Paul J. Virgo, Of Counsel

10 Attorneys for Respondent

11 Stephen Lyster Siringoringo
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DECLARATION OF SERVICE

Re: In the Matter of Stephen Lyster Siringoringo

Case No.: 11-O-18390 et al

I, Paul Virgo, declare:

I am over the age of 18 years and not a party to the within action. My business address is 9909 Topanga Canyon Blvd., #282, Chatsworth, California 91311, in the County of Los Angeles.

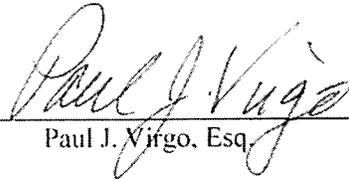
RESPONDENT'S ANSWER TO NOTICE OF DISCIPLINARY CHARGES

was hand delivered to:

State Bar Court-Hearing Department
State Bar of California
1149 S. Hill Street
Los Angeles, CA 90015-2299

Ashod Mooradian, Deputy Trial Counsel
OCTC, Enforcement
1149 S. Hill Street
Los Angeles, CA 90015-2299

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 November 14, 2012


Paul J. Virgo, Esq.

1 187. In response to paragraph 187 of the NDC, Respondent
2 denies said allegations.
3

4
5 Dated: November 14, 2012

6 Respectfully submitted,
7 CENTURY LAW GROUP

8 By: Paul J. Virgo

9 Paul J. Virgo, Of Counsel
10 Attorneys for Respondent

11 Stephen Lyster Siringoringo
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