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STATE BAR COURT CLERK'S OFFICE
SAN FRANCISCO

Attorneys for Ashley C. L. BROWN

THE STATE BAR COURT
HEARING DEPARTMENT - LOS ANGELES

In the Matter of) Case Nos.: 14-O-03717-PEM
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)
)
Ashley C. L. Brown, Respondent)
) RESPONDENT'S ANSWER TO NOTICE
No. 210159) OF DISCIPLINARY CHARGES
)
)
) Initial Status Conference: March 2, 2015 @9:30
A Member of the State Bar

TO THE HONORABLE PAT MCELROY, JUDGE OF THE STATE BAR COURT
OF THE STATE BAR OF CALIFORNIA, AND TO SENIOR TRIAL COUNSEL ELI
MORGENSTERN, OFFICE OF THE CHIEF TRIAL COUNSEL OF THE STATE BAR
OF CALIFORNIA:

Pursuant to Rule 5.43 of the Rules of Procedure of the
State Bar of California, Respondent Ashley C.L. Brown, by and
through his attorney(s) of record, hereby submits the following
in response to the Notice of Disciplinary Charges (hereinafter
"NDC") on file herein:

Under the provisions of the Rules of Procedure of the
State Bar of California, Respondent Ashley C.L. Brown hereby
responds to each and every allegation of the NDC and the whole

ANSWER TO NOTICE OF DISCIPLINARY CHARGES

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1 thereof and further denies the Respondent has violated any Rule
2 of Professional Conduct in any manner whatsoever. In response to
3 the specific allegations set forth in the NDC on file herein,
4 Respondent Ashley C.L. Brown asserts:

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

7
8 Case No. 14-O-03717

9 Count One

10 2. In response to Paragraph 2 of the NDC, Respondent
11 denies said allegations.

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13 Count Two

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

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17 Count Three

18 4. In response to Paragraph 4 of the NDC, Respondent denies
19 said allegations.

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21 Count Four

22 5. In response to Paragraph 5 of the NDC, Respondent denies
23 said allegations.

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25 Count Five

26 6. In response to Paragraph 6 of the NDC, Respondent denies
27 said allegations.

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Dated: February 20, 2015

Respectfully submitted,
CENTURY LAW GROUP

By: Paul J. Virgo
Paul J. Virgo, Of Counsel
Attorneys for Respondent
Ashley C.L. Brown

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PV

DECLARATION OF SERVICE

Re: In the Matter of Ashley C. L. Brown
Case No: 14-O-03717

I, Paul J. Virgo, declare:

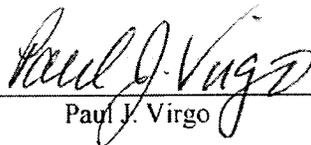
I am over the age of 18 years and not a party to the within action. My business address is 9909 Topanga Canyon Blvd., #282, Chatsworth, California 91311, in the County of Los Angeles.

RESPONDENT'S ANSWER TO NOTICE OF DISCIPLINARY CHARGES
were hand delivered to:

State Bar Court-Hearing Department
State Bar of California
845 S. Figueroa Street
Los Angeles, CA 90017-2515

Eli Morgenstern, Senior Trial Counsel
OCTC. Enforcement
845 S. Figueroa Street
Los Angeles, CA 90017-2515

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 Chatsworth, California, on February 23, 2015



Paul J. Virgo