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FILED

AUG 24 2015

**STATE BAR COURT CLERK'S OFFICE
SAN FRANCISCO**

STATE BAR COURT

SAN FRANCISCO HEARING DEPARTMENT

17 In The Matter of:) Case No. ⁴15-O-05978
18)
19 TAM NGUYEN) ANSWER TO
20 No. 159601) DISCIPLINARY CHARGES
21)
22 A Member of the State Bar)
23)
24)

25
26 **COUNT ONE**

27 Respondent Tam Nguyen denies the charge and responds that he did notify the clients upon
28 receipt of the fund.

29 **COUNT TWO**

30 Respondent Tam Nguyen denies the charge and responds that he did maintain the balance on
31 behalf of his clients.

32 **COUNT THREE**

33 Respondent Tam Nguyen denies the charge and responds that he did not misappropriate clients
34 fund.

35 **COUNT FOUR**

36 Respondent Tam Nguyen denies the charge and responds that he did not fail to maintain
37 clients' fund.

38 **COUNT FIVE**

39 Respondent Tam Nguyen denies the charge and responds that he did not misappropriate
40 clients' fund for medical provider.

41 **COUNT SIX**



42 Respondent Tam Nguyen denies the charge and responds that he did not violate probate code
43 for minor client.

44
45
46 COUNT SEVEN

47 Respondent Tam Nguyen denies the charge and responds that he did not violate probate law
48 regarding minor's fees.

49
50 COUNT EIGHT

51 Respondent Tam Nguyen denies the charge and responds that he had cooperate and did not
52 refuse to cooperate with state bar investigation.

53
54 Respectfully submitted.

55
56 Dated: 8-24-2015

57 /s/ 
58 TAM NGUYEN
59 Respondent

60
61 PROOF OF SERVICE

62
63 On this day as signed, I, Tam Nguyen, have served a copy of this ANSWER to the following
64 parties:

65 Jayne Kim, Esq., Chief Trial Counsel, State Bar
66 180 Howard Street, San Francisco, CA 94105
67 And to email: susan.kagan@calbar.ca.gov

68
69 Dated: 8-24-2015

70 /s/ 
71 TAM NGUYEN
72 Respondent