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THE LAW OFFICES OF KEVIN GERRY
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Attorneys for Respondent Victor Salas, Jr.

FILED

JUN 02 2017 *DO*

STATE BAR COURT
CLERK'S OFFICE
LOS ANGELES

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

In the Matter of:

VICTOR SALAS, JR.

A Member of the State of Bar of California

(Member No. 138107)

) Case Nos: 16-O-10058; 16-O-10755 and
) 16-O-13974

) RESPONDENT'S RESPONSE TO
) THE STATE BAR'S NOTICE OF
) DISCIPLINARY CHARGES

) Assigned to Judge Y. Roland

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

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226 151 501



1 Please take notice that Respondent Victor Salas, Jr. (hereinafter "Respondent")
2 hereby submits the following Response to the State Bar's Disciplinary Charges:
3

4 **INTRODUCTION**

5
6 Respondent has not yet fully completed the investigation of facts relating to
7 these cases and has not yet fully completed discovery in this action and has not
8 completed preparation for trial. This Response to the State Bar's Disciplinary Charges
9 is based solely upon information and documents which are presently available to, and
10 specifically known by Respondent. It is anticipated that further discovery, independent
11 investigation, legal research and analysis will supply additional facts, add meaning to
12 the known facts, as well as establish entirely new factual conclusions and legal
13 contentions, all of which may lead to substantial additions to, changes in and
14 variations from this Response to the State Bar's Disciplinary Charges as herein set
15 forth.
16

17 The following Response to the State Bar's Disciplinary Charges is provided
18 without prejudice to the Respondent's right to produce evidence of any subsequently
19 discovered facts, documents or witnesses. If the Respondent obtains additional
20 information or documents, learns the identity of additional witnesses, or determines
21 that it intends to call additional witnesses to testify at the hearing of this matter, it will
22 modify, amend, and/or supplement this Response to the State Bar's Disciplinary
23 Charges to reflect said discovery additional information or documents, learns the
24 identity of additional witnesses.
25
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1 **PROOF OF SERVICE**

2
3 I Kevin Gerry declare under penalty of perjury under the laws of the State of California
4 that the following is true and correct:

5 I am over the age of 18 and not a party to this case.

6 My business address is: 1001 Olive Street
7 Santa Barbara, CA 93101

8 On the date stated below, the foregoing documents described as:

9 **RESPONSE TO THE NOTICE OF DISCIPLINARY CHARGES**

10 Were served on the interested parties in said action, by:

11 (MAIL SERVICE) placing the original or true copies thereof enclosed in a sealed
12 addressed envelope to:

13 (OVERNIGHT MAIL) placing the original or true copies thereof enclosed in sealed
14 addressed overnight mail envelope to:

15 (PERSONAL SERVICE) delivering said documents to:

16 (FACSIMILE) causing delivery via facsimile to:

17 (E-MAIL) causing delivery via electronic mail to:

18 The following addressees:

19 Shataka Shores-Brooks
20 The State Bar of California
21 Office of Chief Trial Counsel
22 845 S. Figueroa Street
Los Angeles, California 90017

23 Executed in Santa Barbara, California on:

05/30/17

Date

24
25 

26
27 Declarant