

STATE OF CALIFORNIA  
BEFORE THE COMMISSION ON JUDICIAL PERFORMANCE

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INQUIRY CONCERNING A JUDGE )  
 )  
 ) ANSWER TO NOTICE OF  
 ) FORMAL PROCEEDINGS  
No. 113 )  
 )

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TO THE COMMISSION ON JUDICIAL PERFORMANCE:

The Honorable Bruce W. Dodds, Judge, admits that from January 3, 1977 to the present he has been a judge of the Santa Barbara Superior Court.

Judge Dodds denies that he was afforded appropriate notice of the charges under investigation or a reasonable opportunity to present such matters as he chose as to all matters referenced by the Preliminary Investigation of the Commission on Judicial Performance which failed in numerous particulars to provide sufficient information about matters to permit a meaningful response or even any response. To bring such allegations is both a denial of due process and an abuse of process. Judge Dodds denies that the charges against him were lawfully instituted pursuant to §18 of Article VI of the California Constitution or any other provision of the California Constitution. Judge Dodds also denies that the charges against him were lawfully instituted in accordance with California Rules of Court 901-22 or any Rules

of Court.

Judge Dodds denies that any of the conduct alleged constitutes wilful misconduct in office. Judge Dodds similarly denies that any of the conduct alleged was prejudicial to the administration of justice that brought the judicial office into disrepute.

Judge Dodds responds to the particulars of the charges as follows:

1. Judge Dodds denies that he obstructed a law enforcement investigation improperly or otherwise involving Judge Slater. Judge Dodds denies that his actions, admitted or otherwise, were contrary to Canon 2A of the California Code of Judicial Conduct.

2. Judge Dodds denies that he has frequently given the appearance of rudeness and prejudgment in handling cases before him. Judge Dodds denies that he has frequently conducted himself in a manner contrary to Canon 3A(4) of the California Code of Judicial Conduct.

3. Judge Dodds denies that in 1987 the remark he made off the record, in private and in chambers was or was intended to be anti-Semitic.

4. Judge Dodds denies that he abused his judicial authority in issuing an order to show cause and holding a hearing in Knickrehm and Howerton v. Lompoc Unified School District, et al. in 1988.

5. Judge Dodds denies that he abused his judicial authority

in proceedings regarding sanctions in Moreland v. Mead  
Reinsurance.

6. Judge Dodds denies that he has been or has given the appearance of being inattentive while on the bench.

Judge Dodds contends that each and every allegation is without merit and that the entire proceeding should be dismissed.

Dated: February 17, 1994

LEWIS, D'AMATO, BRISBOIS & BISGAARD  
GORDON J. CALHOUN

By Gordon J. Calhoun  
GORDON J. CALHOUN  
Attorneys For The Honorable  
BRUCE W. DODDS, Judge

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA

I have read the foregoing ANSWER TO NOTICE OF FORMAL PROCEEDINGS and know its contents.

CHECK APPLICABLE PARAGRAPH

- I am party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true. I am an officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

- I am one of the attorneys for a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on , 19 , at , California. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

JUDGE BRUCE W. DODDS Type or Print Name

Signature

PROOF OF SERVICE 1013A (3) CCP Revised 5/1/88

STATE OF CALIFORNIA, COUNTY OF

I am employed in the county of , State of California.

I am over the age of 18 and not a party to the within action; my business address is:

On , 19 , I served the foregoing document described as

on in this action.

- by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list; by placing the original a true copy thereof enclosed in sealed envelopes addressed as follows:

BY MAIL

\*I deposited such envelope in the mail at , California. The envelope was mailed with postage thereon fully prepaid.

As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at , California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on , 19 , at , California.

- (BY PERSONAL SERVICE) I delivered such envelope by hand to the offices of the addressee.

Executed on , 19 , at , California.

- (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct. (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Type or Print Name

Signature

\*BY MAIL SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT BOX OR BAG

\*\*FOR PERSONAL SERVICE SIGNATURE MUST BE THAT OF MESSENGER

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 221 North Figueroa Street, Suite 1200, Los Angeles, CA 90012.

On February 22, 1994, I served the foregoing document described as ANSWER TO NOTICE OF FORMAL PROCEEDINGS on interested parties.

XX by placing     the original XX a true copy thereof enclosed in sealed envelopes addressed as follows:

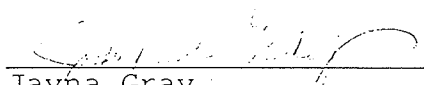
Jennifer Machlin, Esq.  
101 Howard, Suite 300  
San Francisco, CA 94105

Deputy Attorney General  
DAVID F. GLASSMAN  
DEPT. OF JUSTICE  
300 South Spring Street  
Los Angeles, CA 90013

XX BY FEDERAL EXPRESS I caused such envelope to be deposited with Federal Express at Los Angeles, California.

Executed on February 22, 1994, at Los Angeles, California.

XX (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct

  
\_\_\_\_\_  
Jayna Gray

LEWIS, D'AMATO, BRISBOIS & BISGAARD  
ROBERT F. LEWIS, ESQ.  
DOUGLAS R. REYNOLDS, ESQ.  
GORDON J. CALHOUN, ESQ.  
221 NORTH FIGUEROA STREET  
12TH FLOOR  
LOS ANGELES, CALIFORNIA 90012  
(213) 250-1800

STATE OF CALIFORNIA  
BEFORE THE COMMISSION ON JUDICIAL PERFORMANCE

_____		)	
INQUIRY CONCERNING A JUDGE		)	
		)	ANSWER TO FIRST
		)	AMENDMENT TO NOTICE OF
		)	FORMAL PROCEEDINGS
No. 113		)	
_____		)	

TO THE COMMISSION ON JUDICIAL PERFORMANCE AND TO ITS ATTORNEYS OF  
RECORD:

The Honorable Bruce W. Dodds, Judge, admits that from January 3, 1977 to the present he has been a judge of the Santa Barbara Superior Court.

Judge Dodds denies that he was afforded appropriate notice of the charges under investigation or a reasonable opportunity to present such matters as he chose as to all matters referenced by the Preliminary Investigation of the Commission on Judicial Performance which failed in numerous particulars to provide sufficient information about matters to permit a

meaningful response or even any response. To bring such allegations is both a denial of due process and an abuse of process. Judge Dodds denies that the charges against him were lawfully instituted pursuant to §18 of Article VI of the California Constitution or any other provision of the California Constitution. Judge Dodds also denies that the charges against him were lawfully instituted in accordance with California Rules of Court 901-22 or any Rules of Court.

Judge Dodds denies that any of the conduct alleged constitutes wilful misconduct in office. Judge Dodds similarly denies that any of the conduct alleged was prejudicial to the administration of justice that brought the judicial office into disrepute.

Judge Dodds responds to the particulars of the charges in Count Two as amended as follows:

Judge Dodds denies that he has frequently given the appearance of rudeness and prejudgment in handling cases before him. Judge Dodds denies the allegations in subparagraphs f and g of paragraph 2 added to the Notice of Formal Proceedings by the First Amendment dated July 26, 1994. Judge Dodds denies that he has frequently conducted himself in a manner contrary to Canon 3A(4) of the California Code of Judicial Conduct.

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Judge Dodds contends that each and every allegation is without merit and that the entire proceeding should be dismissed.

Dated: August 4, 1994

LEWIS, D'AMATO, BRISBOIS & BISGAARD  
ROBERT F. LEWIS  
DOUGLAS R. REYNOLDS  
GORDON J. CALHOUN

By *Gordon J. Calhoun*  
GORDON J. CALHOUN  
Attorneys For The Honorable  
BRUCE W. DODDS, Judge



VERIFICATION

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I have read the foregoing ANSWER TO FIRST AMENDMENT TO NOTICE OF FORMAL PROCEEDINGS and know its contents.

CHECK APPLICABLE PARAGRAPHS

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an Officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on AUGUST, 19 94, at SANTA BARBARA, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

BRUCE W. DODDS, JUDGE
Type or Print Name

Signature

PROOF OF SERVICE
1013a (3) CCP Revised 5/1/88

STATE OF CALIFORNIA, COUNTY OF

I am employed in the county of, State of California.

I am over the age of 18 and not a party to the within action; my business address is:

On, 19, I served the foregoing document described as

on in this action

- by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list:
by placing the original a true copy thereof enclosed in sealed envelopes addressed as follows:

BY MAIL

I deposited such envelope in the mail at, California. The envelope was mailed with postage thereon fully prepaid.

As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

Executed on, 19, at, California.

(BY PERSONAL SERVICE) I delivered such envelope by hand to the offices of the addressee.

Executed on, 19, at, California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Type or Print Name

Signature

(BY MAIL SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT, BOX, OR BAG)

(FOR PERSONAL SERVICE SIGNATURE MUST BE THAT OF MESSENGER)

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 221 North Figueroa Street, Suite 1200, Los Angeles, CA 90012.

On August 10, 1994, I served the foregoing document described as **ANSWER TO FIRST AMENDMENT TO NOTICE OF FORMAL PROCEEDINGS** on interested parties.

XX by placing    the original XX a true copy thereof enclosed in sealed envelopes addressed as follows:


Jennifer Machlin  
COMMISSION ON JUDICIAL PERFORMANCE  
101 Howard Street  
Suite 300  
San Francisco, CA 94105

Deputy Attorney General  
DAVID F. GLASSMAN  
DEPT. OF JUSTICE  
300 South Spring Street  
Los Angeles, CA 90013

XX **BY MAIL** I caused such envelope to be deposited in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

Executed on August 10, 1994, at Los Angeles, California.

XX (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct

  
\_\_\_\_\_  
ENIA A. CASTILLO