STATE OF CALIFORNIA BEFORE THE COMMISSION ON JUDICIAL PERFORMANCE

INQUIRY CONCERNING A JUDGE

No. 113

ANSWER TO NOTICE OF FORMAL PROCEEDINGS

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

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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 <u>Knickrehm and Howerton v. Lompoc Unified School District, et</u> <u>al.</u> in 1988.

5. Judge Dodds denies that he abused his judicial authority

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in proceedings regarding sanctions in <u>Moreland v. Mead</u> <u>Reinsurance</u>.

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

un) By

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

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VERIF	ICATION

,	STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA
	I have read the foregoing
	ANSWER 10 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 I an officer I a partnerI 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 documen
	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
	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, I9, at, California
	I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct
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	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
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The er	nvelope was mailed with postage	thereon fully prepaid		
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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.

<u>XX</u> by placing _____ the original <u>XX</u> 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.

 \underline{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

No. 113

ANSWER TO FIRST AMENDMENT TO NOTICE OF FORMAL PROCEEDINGS

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

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ii. Elle-By

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

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VERIFICATION

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

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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. T	The matters stated in the foregoing document are true of	my own knowledge except as to
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I am one of the attorneys for _		,
	is absent from the county of aforesaid where such attorne f of that party for that reason. I am informed and believe	
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Executed on <u>AUGUST</u>	, 19 <u>94</u> , at <u>SANTA</u> BARBARA	, California.
l declare under penalty of perjury u	under the laws of the State of California that the foregoing	is true and correct.
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STATE OF CALIFORNIA, COUNTY (State of California
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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.

<u>XX</u> by placing _ the original <u>XX</u> 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.

 \underline{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

DATA94LA: 95096.1