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June 26th, 2015 Board of Disciplinary Appeals P.O. Box 12426 Austin, Texas 78711 Ph (512) 427-1576 Fax (512) 427-4130



RE: BODA APPEAL

CFLD v. Charles Septowski Case #201400356

Greetings:

This second submission is after receipt of the Disbarment Hearing Transcript of 2/26/2015, a week ago Monday – June 15^{th} , 2015.

The Hearing Transcript for the Motion to Abate Immediate Imposition of Sanctions held 4/10/2015; is still pending.

Upon receipt, (if there is subsequent information to be added); that information will be raised with a supplemental filing.

Respectfully,

/s/ Charles Septowski

Former Tx. Bar #18032325

12115 Lavinia Lane, Austin, Texas 78753

Ph (512) 744-8115/653-7133 Fax (866) 856-2784 Email-Profchaz@Hotmail.com

Cc: Ms. Deberry – Texas Bar Grievance Counsel via Fax & Email BODA - #201400356 Appellant Submission Charles Septowski

BOARD OF DISCIPLINARY APPEALS

TEXAS BAR

RE: CFLD V. CHARLES SEPTOWSKI - Case #201400356

APPEALANT SECOND SUBMISSION

CASE CAPTION I

RE: CFLD V. CHARLES SEPTOWSKI - Case #201400356

APPEAL of DISBARMENT – Second Submission after receipt of 2/26/2015 Transcript.

- Awaiting Transcript of 4/10/2015 Motion to Abate Immediate Imposition of Sanctions

ORAL ARGUMENT REQUESTED II

APPEALANT requests Oral Argument before the Board of Disciplinary Appeals as information about the Fraud & Collusion of the Texas Bar Grievance Counsel needs to be considered, which was unknown at the time of the Disbarment Hearing of 2/26/2015 and excluded as evidentiary exhibits 4/10/2015 at the Hearing to Abate Immediate Imposition of Penalties.

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5th Amendment – Compulsory Obligation to speak to Investigative Panel or have added charges of non-cooperation with investigation – Violation of 5th Amendment right against self-incrimination. Plus Double Jeopardy Clause whereby Texas Bar imposes both fines and Disciplinary Rule violations for same allegation.

9th Amendment – Right to Privacy Violation by interference with Appellant's law practice by collusion with opposing counsel. Page 14

14th Amendment – Right to Substantive and Procedural Due Process Violations by changes in procedure of Disciplinary Evidentiary Hearing – Excluding Appellant's Witnesses and the hearing being but a "rubber stamp" of Grievance Counsel Allegations – based on half truths, defamatory statements out of context and argument to defame Appellant with semi attached information. Page 11, 13 & 14

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Introduction V

This Submission is to have the Disbarment of the above attorney reviewed and set aside in light of the:

- 1) Issues raised;
- Improprieties documented of Bar Grievance Counsel and Hearing Chair letting Bar Grievance Counsel run the Evidentiary Hearing;
- 3) Procedural defects as set forth in the hearing transcripts; and
- 4) Exclusion of exculpatory information;

The issue of purported violations of Federal Bankruptcy Procedure is on Appeal with the

Federal District Court in Dallas – (i.e. whether intermediate Final Orders of the Bankrupcty Court Mooted issues raised of unauthorized filings in the Bankruptcy Hearing to Examine Counsel (Were filings in Bankruptcy Court resolved by Final Orders, which makes alleged DR violations moot?) Bankruptcy Court Hearing on Motion to Examine Counsel heard on 11/20/2013 and 1/6/2014.

Jurisdictional Statement VI

The Texas Bar Disciplinary Rules and Procedures for Review of Texas Hearing Board Determinations are governed by the procedural provisions for the Board of Disciplinary Appeals TEXAS RULES OF DISCIPLINARY PROCEDURE - **Rule 7.08** (Powers & Duties) **Rule 8.04** (Compulsory Discipline Procedure).

This submission is in accordance with those provisions under TEXAS RULES OF DISCIPLINARY PROCEDURE - SECTION **TRDP 8.0** Compulsory Discipline.

Statement of Issues upon Appeal VII

Appellant contends that the Texas Disciplinary System has been hijacked for the purpose of "targeting" Appellant and ultimately disbarring him. The issues are Bar Counsel Misconduct, Bias, Official Oppression, intentional Fraud and Collusion in pursuing alleged acts of misconduct which were knowingly without merit by Bar Grievance Counsel.

Standard of Review VIII

The Rules for the Board of Disciplinary Appeals specify that the review shall be of the record from the Disciplinary Hearing Board Transcript. That review will be a "de novo review" to include "....the Board of Disciplinary Appeals shall sit, hear and determine whether the Attorney should be disciplined and enter judgment accordingly" – TRDP 8.04 as proscribed in the Rules of the Board. This review shall also include the Texas Disciplinary Rules of BODA - #201400356 Appellant Submission Charles Septowski 7

Professional Conduct, which expressly prohibits the Texas Bar pursuing "*an Agenda or* "*parochial interest*". (**TDRPC Paragraph 8**) Herein, the violation of that prohibition is the underlying basis of this entire matter as it stems from other than the legitimate enforcement of the Texas Disciplinary Rules of Professional Conduct.

Finally quoting the Scope of the Texas Disciplinary Rules of Professional Conduct (Scope Paragraph 10.); "....(these) are rules of reason.".

Statement of the Case IX

Factual Background

As background for this Appeals panel, the following disciplinary events occurred over the last 6 years:

In 2009 – Appellant pays bar dues online and receives receipt and confirmation while Bar Membership Payment System rejects payment for typo in Bank Routing Number; the Mailed notice of a problem with the payment was never received by Appellant which yielded an Administrative Suspension. Appellant upon notice first week of January 2010 paid the dues and the Administrative Suspension was withdrawn. Meanwhile, Opposing Counsel was a member of a Bar Disciplinary Hearing Panel files a Motion & Grievance to Disqualify Appellant as Counsel which is denied by Trial Court. and morphs by the Texas Bar Grievance Counsel into DR Violation; Appellant unknowingly didn't move for Deferral program for this ministerial issue. Appellant attempted to assert reasonable reliance on the receipt and confirming email BODA - #201400356 Appellant Submission Charles Septowski which at Trial the Court disagreed yielding an \$11,000 fine, plus one year suspension probated to one month with the remaining term of probation.

In 2010 – Appellant completes MCLE timely and this reporting posts 7-8 minutes late on Texas Bar MCLE System. Appellant applies for "just cause exception", literally the next morning which is denied and pays \$100 penalty – which isn't processed by Texas Bar resulting in another Administrative Suspension. Appellant does not receive notice of this fine issue and the Office of Chief Disciplinary Counsel issues a Grievance filing for practicing while administratively suspended – resolved with the Office of Chief Grievance Counsel as an additional six month probation & further fine of \$670 dollars plus \$400, already paid by Appellant for Reinstatement.

This comes up as Appellant is handling the Probate of his best friend's estate for the Decedent's Widow. During the resolution of this matter, Bar Grievance Counsel (**DEBERRY**) mistakenly sends email to Appellant

"... FYI – he may have regained some of his senses. We'll see..." 3/30/2012 at 3:49PM followed by Recall Email 3/30/2012 at 3:52 PM (upon realizing sent to Appellant in error). (Part of Motion to Remove Bar Disciplinary Counsel due to Conflict of Interest.)

Both the bar dues snafu of 2009 and the MCLE posting of 2010, are Disciplinary Rules Violations which but for Appellant taking of this dues matter to trial would and should have been resolved as Bar Deferral Issues. These were strict interpretations and enforcement of the letter of the Disciplinary Rules, but not their spirit or intent. The Texas Rules of Disciplinary Conduct preamble prescribes in (**TRDPC Introduction paragraph 8**) "....*The legal profession has a*

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responsibility to assure that its regulation is undertaken in the public interest rather than in furtherance of parochial or self-interested concerns of the bar, and to insist that every lawyer both comply with its minimum disciplinary standards and aid in securing their observance by other lawyers. (TRDPC Introduction Paragraph 9) further "....Each lawyer's own conscience is the touchstone against which to test the extent to which his actions may rise above the disciplinary standards prescribed by these rules."

If this is the proper application of the Texas Rules of Professional Conduct – then it's an application of "form over substance" in the rules enforcement, which has never been part of the proper administration of the Bar in this jurisdiction or any other. This also bespeaks the defects in the current Texas Bar Disciplinary System which rests the role of investigation, preferring a Disciplinary Violation and prosecution of the case – all within the purview of the Bar Grievance Counsel. This eliminates the counter balances of the roles of investigation and decision to pursue a Violation – which is per se a conflict of interest and worse a denial of substantive Due Process. (14th Amendment US Constitution) Further, the capacity of the Bar to both fine the Appellant and then prefer Disciplinary Violations violates the Concept of Double Jeopardy. (5th US Constitution)

In 2011 – Appellant stops a client money laundering scheme and false taking of escrows by his client of dishonored bonds (i.e. worthless documents). (The plan proffered was that the Client would use the Bailor(s) documents to back loans for overnight deposit trading.) One of the BODA - #201400356 Appellant Submission Charles Septowski 10

Bailors abandons their goods, then files a Grievance that Appellant has withheld goods longer than 10 days as specified in the escrow agreement. Bar Grievance Counsel pushes for a Grievance for intentional violation of the Escrow by Appellant wrongfully withholding of "abandoned" escrow documents. As for the dispute with the Bailor this is resolved by agreement with Bailor acknowledging the Bar Grievance was retaliatory and without merit after being sued for breach of the Escrow Agreement by the Appellant/Escrow agent. Bar Grievance Counsel fraudulently represents there is an ongoing issue with this escrow (despite being aware of the releases signed by the Bailor acknowledging the grievance filing was without merit and mere retaliation for stopping the "client fraud scheme".) (It turns out the Bailor was partner with the client who was displeased that Appellant had ended the client fraud scheme and taking of escrows behind Appellant's back.) (This entire Grievance was masterminded by the client unhappy with his fraud scheme being terminated by Appellant.) Bar Grievance Counsel (aware of all of these facts), pursued this Grievance under threat of Disbarment of Appellant. Appellant took a 3 month suspension, plus a psychological examination plus fines of \$6700, as a penalty for a settlement to save his Bar License. Minimizing his exposure – Appellant was approaching 60 years of age and didn't want to risk Disbarment – despite being guilty of nothing. Appellant passed the Psychological exam which negated the Office of Chief Disciplinary Counsel's oversight and interference with Appellant's life. This didn't sit well with Bar Grievance Counsel, so Bar Grievance Counsel went forward to manipulate circumstances to put Appellant in further jeopardy. This was done by collusion with opposing counsel in an ongoing client case, to create/put Appellant in yet another Grievance allegation - #201400356. (Violation of 5th Amendment right against self incrimination, 14th Amendment Violation of substantive due process where the allegations offered are in bad faith.)

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In 2013 – The settlement occurs in March for the 2011 worthless Escrow allegation. Appellant passes the Psychological examination and this is all before the suspension of May-July 2013. Bar Grievance Counsel then coordinates with Opposing Counsel in a Franchise Royalty Case to entice/bully Appellant into protecting his clients where Opposing Counsel intentionally pushes discovery, despite Appellant's incapacity due to Suspension. Appellant arranges alternative counsel which falls through and representations are made that Appellant has intentionally broken suspension, plus Appellant having taken occupation tax exclusion as a Non-Profit Director (Despite being such a Director for over fifteen years) and that Appellant has used title "& Associates" in violation of DRs – Despite using such title last 33 years (25 years in Texas) and having associates in other offices (states).

This last analysis is used as basis for Hearing Panel 9-3 Disbarment finding and denial of Abatement of Immediate Imposition of Disbarment and financial penalties and ignoring issues preserved of conflict of interest by Bar Counsel, Grievance counsel's participation in collusion with Opposing Counsel and Bar Counsel's participation in ongoing litigation while in a conflict situation in violation of Texas Disciplinary Rules of Conduct Rule **1.06** (b) (1) "...*involves a substantially related matter in which that person's interests are materially and directly adverse to the interests of another client of the lawyer or the lawyers firm.*"

Summary of Argument(s) X ARGUMENT(s) XI

Argument #1 - Conflict of Interest by Grievance Counsel and therefore Texas Bar

Texas Bar Disciplinary Counsel's participation in this enforcement case while a Defendant in civil suit filed by Appellant violates the Conflict rules of the Texas Rules of Civil Procedure as well as the Texas Rules of Disciplinary Procedure. Plus, conflict of Hearing Panel as part of Texas Bar, plus Board of Disciplinary Appeals as part of Texas bar, all sub entities of Texas Supreme Court, thereby making this state action versus Appellant as an individual by State Employees acting in their ministerial roles. **TRDP 1.06(b)(1) & 14th Amendment Substantive Due Process.**

Argument #2 - Impairment of Appellant's Rights under US Constitution 4th, 5th, 9th, & 14th Amendment(s)

Texas Bar Disciplinary procedure demands cooperation by Appellant or additional grievance(s) which denies Constitutional protections of the 4th, 5th, 9th, and 14th amendments..

4th Amendment violations by Bar Grievance Counsel issuing Subpoena's for email Records which are prohibited in state actions by the case law analysis of the 1996 Federal Communications Act;

5th Amendment violations by requiring the Appellant to participate in the investigation and defense of allegations of Professional misconduct in derogation of the Appellant's fifth amendment rights against self incrimination by a governmental body acting in a regulatory role; Plus Double Jeopardy application of fines and subsequent Disciplinary Rules Violations for the same incident.

9th Amendment violations by bar Grievance Counsel in inquiry into the private personal and medical status of the Appellant in the penalties assessed – requiring disclosure of medical reports that have no legitimate basis in professional conduct measurement; Plus collusion to impact clients and Appellant by Bar Counsel's actions.

14th Amendment violations by Bar Grievance Counsel's manipulation of both procedural and substantive due process by manipulating the procedures undertaken as well as the – rigging (rubber stamping) of Bar Grievance Counsel's presentation without regard for the bias and half-truths presented to manipulate the outcome. This negates the legitimacy of he entire Disciplinary system as manipulated by other than a process that is one of truth telling and clear unbiased review of the facts before the Hearing Board.

Argument #3 - Grievance Counsel's Violation of Texas Rules of Professional Conduct The Texas Rules of Professional Conduct require that their be no "parochial interest" by the Texas Bar – which on a res ipsa loquitor basis – is met as the email of March 30, 2012, by Bar
Counsel Deberry demonstrates not only bias, but also communication with others of that bias.

Examples of Bias by Bar Grievance Counsel:

1) Email March 30, 2012 (Deberry sends in error to Appellant)

"... FYI – he may have regained some of his senses. We'll see..." 3/30/2012 at 3:49PM followed by Recall Email 3/30/2012 at 3:52 PM (upon realizing sent to Appellant in error). (Part of Motion to Remove Bar Disciplinary Counsel due to Conflict of Interest.)

- Pursuit of 2011 worthless escrow by Bar Grievance Counsel knowing this matter to be without merit – yet transforming this into a DR violation for withholding an escrow where a lawsuit had to be filed to force return the goods to the Bailor by Appelllant;
- Showing up in Dallas for Motion to Examine Counsel manipulated through US Trustee's office – 11/20/2013;

- Filing of 2014 DR violations over mooted acts already resolved by Final Orders in the Bankruptcy Court;
- Raising of Violation of Occupation Tax exemption, despite Appellant being a Non-Profit Director;

 Raising "and Associates" as a DR violation, after confirming Appellant's associates in other offices and attempts at use of support counsel in Texas case at issue.

Argument #4 - Targeting of Appellant for Discipline and Disbarment

From the morphing of alleged violations in 2009 to the 2015 Disbarment hearing, there is active intervention to pursue the Appellant with Disciplinary attention. This goes from Bar Grievance Counsel on up the ladder of the Grievance Disciplinary Process pursuant to the emails, and participation of Supervisory Counsel for the Texas Bar and then referral to the Chair of the Texas Disciplinary Committee for a ruling as to the Conflict of Interest motions filed and preserved as part of the record in this case... **Tr. P10, SCA Act 1986,** *U.S. v. Warshak,* **631 F.3d 266 (6th Cir. 2010)**

How the 2009 Motion to Disqualify Counsel (in a domestic* relations case), which is denied by the Trial Court changes into a Disciplinary action over bar dues payment which is already resolved – again speaks for itself as a "targeting" of the Appellant. (The fact that the opposing attorney moving for the Disqualification of Counsel (Appellant) was a hearing panel member, bespeaks (on its face), a manipulation of the Disciplinary Enforcement System. Then the subsequent Disciplinary Enforcement over MCLE posting 7-8 minutes late is affirmation (again on its face), of "targeting" of Appellant. Then the 2011, allegation of withholding an escrow, where it is abandoned and Grievance Counsel is aware that Appellant had to sue Bailor to return goods makes the pursuit of this "supposed grievance violation" fraud on its face as it misrepresents, that Appellant withheld the goods when the facts and the settlement release with Bailor both acknowledge that Bailor's Grievance was filed in bad faith and that there was no BODA-#201400356 Appellant Submission Charles Septowski legitimate basis for the grievance. Finally, the express participation by Bar Grievance Counsel in showing up for the Bankruptcy Case hearing in Dallas – November 20th, 2013 and then drafting of a violation of the DRs to put Appellant in further investigation was not done in good faith or with legitimate basis where the same Grievance Counsel was in Collusion with Opposing Counsel to 'set-up' Appellant during the agreed Suspension of 2013, resulting from fraudulent representations of Grievance Bar Counsel.

Argument #5 - **Procedural Irregularities of Hearing**

The Hearing procedures require that after the presentation of the Bar's evidence that the Appellant be allowed to present mitigation information and witnesses. Both were excluded at the Disbarment Hearing where Grievance Counsel took over running the Hearing and then the subsequent statements of (12) clients and Professional Portfolio of the Appellant both being excluded from exhibits in the Disbarment Hearing and again in the Motion to Abate Immediate Imposition of Sanctions hearing of 4/10/2015. Further, the affidavit of the Collusion of Bar Counsel with Opposing Counsel was denied as an exhibit before the Hearing Panel in the Motion to Abate Immediate Imposition of Sanctions. These evidentiary rulings plus the discovery rulings were all 100% supportive of the Bar Grievance Counsel positions, demonstrating an active bias by the Hearing Chair to the requests of Bar Grievance Counsel or could be described as the Hearing Chair being a "stooge" or "lackey" of the Bar Grievance Counsel. The Transcript itself clearly demonstrates that Bar Grievance Counsel and not the Hearing Chair ran the Disbarment Hearing of 2/26/2015 and the subsequent hearing on the Motion to Abate Immediate Imposition of the Disbarment Sanctions. Tr P.10,199

Argument #6 - Active Fraud by Texas Bar Grievance Counsel in conducting Ministerial Acts

The actions by Bar Grievance Counsel participating in Bankruptcy Case and attending the Bankruptcy Hearing of 11/20/2015, plus preferring allegations for DR violations, coordinating with Opposing Counsel in an ongoing case plus not finding it violative of the DRs "breaking them to enforce them", is malfeasance or worse (Excluded Affidavit of Witness to on the Record of admissions by Opposing Counsel $4/1/2015 - 191^{st}$ District Court Dallas Judge Slaughter Case No. DC-12-06489

Argument #7 - "Texas rules of Professional Conduct are rules of Reason" (Scope Para. #10)

As this Board reviews the Transcript, the history of allegations and resulting official Disciplinary actions which have resulted that this Board recognize the lack of rhyme or reason that would support these as legitimate outcomes in this matter. I hope this Board is sufficiently mortified and struck with the absolute absurdity of this entire matter. There is no question the 2009 bar dues snafu or the posting of MCLE were black letter rules violations. There is also no question this Disciplinary response was building mountains out of mole hills and double jeopardy after fining the Appellant and then prosecuting these matters as Disciplinary Violations. The pattern of targeting, escalation and then the absurd further manipulation to prosecute a Grievance for a "worthless escrow", and having that not yield sufficient penalty with mental health overview of the Appellant, lead to the collusion of Bar Grievance Counsel with Opposing Counsel, interfering in litigation and the Motion to Examine Counsel and the concurrently discovery collusion pre-trial of the client Franchisee Royalty suit in September 2014. There is

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no "reason" for such an odyssey of strained and peculiar facts that justify the use of the Texas Disciplinary system for Professional Conduct, in the manner utilized. This isn't reasoned enforcement under any perverted sense of duty, strict adherence of the Rules of Professional Conduct or plain common sense. It was and has been abusive, absurd and incredibly hurtful to Appellant and used by the Office of Chief Disciplinary Counsel as a flag waiving exemplar of the power of that Office to "hover fear over Texas Attorneys". That is not what the cited provisions of the Texas Rules of Professional Conduct provide nor is a reasoned example of proper regulation of our profession.

Appellant's hope is that the full review standard as required in the Texas Rules of Disciplinary Procedure – bear out that this Appeals Board reject this travesty of abuse by the Office of Chief Grievance Counsel perpetrated against this Appellant.

Conclusion & Relief Requested XII

CONCLUSION XII(a)

That the Bar Rules of Disciplinary Conduct Ethics Rules have been mis-used for a personal biased vendetta and revenge against the Appellant by "targeting" him for nit-picky enforcement of the Disciplinary Rules with the Ultimate result of Disbarment. This violates the Texas Bar Rules of Professional Conduct with the Bar (and/or its agents) having a personal agenda – "parochial interest" or an agenda in this case to vilify the Appellant and supposedly legitimize the Disbarment of Appellant.

There is a further element here that the Transcript addresses – which is Bar Grievance Counsel's tying this all together as Appellant has no regard for repeated violations of administrative suspensions as a repeat or serial abuser so that Disbarment is a legitimate penalty. There is no issue the first two instances of 2009 and 2010 are DR violations at least in terms of a black letter reading of the Rules of Professional Conduct. There is no showing of an intentional disregard of the DRs nor are these instances that necessarily should ever have been processed as anything other than ministerial issues resolved under the Deferral system. To claim intentional indifference to clerical errors which were more than reasonably addressed mis-characterizes these issue and worse, their use as a pattern of abuse is absurd on its face. For this to be the basis for the reasonableness of Disbarment presses "reason". Disbarment is the most severe of penalties and it assumes an egregious abuse of the public, bar and legal system. Here the 2011 Escrow turned into a cohersed disposition in 2013 and then collusion to generate more or another Grievance between Bar Counsel and Opposing Counsel is in and of itself incomprehensible as so far a field and blatant mis-use of the Grievance enforcement system as to make this entire matter appalling on its face. It is absurd that the Appellant has been subject to this official abuse and targeting for six years. That has to be fixed. That is what this appeal and the civil suit are all about - Septowski v. Deberry (Travis County Texas 53rd District Court Case cite No. D-1-GN-15-000010).

All of us in the legal profession believe in the system we are a part of and that its application in a fair and unbiased manner gives us the certainty of the Rule of Law and that its absence anarchy. We require that the system be fairly administered to ensure its reliability and more the integrity of the Rule of Law. This case and appeal is a travesty and it is the role of this

Board of Disciplinary Appeals to see that the integrity of this system is upheld. Respectfully, I request that this Board ensure that this standard is met.

Who Watches the Watchers - 'Quis custodiet ipsos custodes?"

That's supposed to be this Appeals Board – pursuant to the stand of review above "....*the Board* of Disciplinary Appeals shall sit, hear and determine whether the Attorney should be disciplined and enter judgment accordingly" – TRDP 8.04 and per TDRPC Paragraph 10 do so pursuant to the "...rules of reason", utilizing the entire transcript, hearing exhibits and pleadings pursuant to these standards but even more so to the common sense of the Board members.

Relief Requested – XII(b)

Texas Bar Reinstatement;

Publication of Reinstatement equal to that of the Disbarment;

Dismissal of fines, sanctions, penalties & Reimbursement of previously paid fines and penalties;

Referral of this Matter to the Attorney General's Office of Official Misconduct Enforcement;

An Express finding that this entire process has been corrupted and violative of the rights of the Appellant and Texas Bar Rules of Professional Misconduct in the enforcement of this matter.

Dismissal and withdrawal of all Disciplinary Enforcement with a clearing of the record of the Appellant for this pattern of "targeted" enforcement.

Clearing of reporting to other State Bars where Appellant has licenses the withdrawal and correction of the previous DR violations and sanctions.

Signature & Proof of Service XIII

Signature XIII(a):

/s/ Charles Septowski

Charles Septowski Former Tx. Bar #18032325

12115 Lavinia Lane, Austin, Texas 78753

Ph (512) 744-8115/653-7133 Fax (866) 856-2784 <u>Email-Profchaz@Hotmail.com</u> June 26th, 2015

Proof of Service XIII(b):

Certificate of Service

The forgoing **APPELLANT FIRST SUBMISSION** in the above entitled action was duly faxed to **(512) 427-4130** and sent via **Email to <u>Classificationappeals@txboda.org</u> to the Board of Disciplinary Appeals, this 26th day of June 2015.**

/s/ Charles Septowski

Charles Septowski

Copies Provided to: Attorney Judith Deberry Texas Bar Grievance Counsel via email and Fax to (512) 427-4167 PO Box 12487 Austin, Texas 78711 Ph 512) 427-1350 Fax (512) 427-4167

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