## DISTRICT OF COLUMBIA COURT OF APPEALS BOARD ON PROFESSIONAL RESPONSIBILITY



		Responsibili
IN THE MATTER OF:	)	
	)	Board Docket No.: 20-BD-018
MICHAEL ALEXEI,	)	Disciplinary Docket No.: 2016-D375
ESQUIRE	)	
	)	
In disciplinary proceedings	)	
	)	

## RESPONDENT'S ANSWER TO THE SPECIFICATION OF CHARGES

In response to the Office of Disciplinary Counsel's Specification of Charges, Respondent makes the following pleading and representation:

- 1. *Admit*.
- 2. *Admit* Maria Victoria Dijamco (hereafter "Maria") contacted Respondent for an appointment. However, this occurred on February 25, 2014.
- 3. Admit that a meeting took place on March 27, 2014. Maria and three others met with the Respondent at the Respondent's home. The parties agreed to have the Respondent research Maria's case for 30 days at no charge.
- 4. *Admit in part* that the Respondent agreed to represent Maria and two retainer agreements were given to Maria. Maria was to decide which retainer she wished to accept. *Deny in part* that this specification accurately describes the first retainer agreement.
- Admit in part that the second retainer agreement was given to Maria. Maria was to decide which retainer she wished to accept.
   Deny in part that this specification accurately describes the second retainer agreement.
- 6. *Admit*.
- 7. Admit.
- 8. *Deny*.
- 9. *Admit in part and deny in part*. This specification does not accurately describes Maria's decision on April 26, 2014.
- 10. *Deny*.
- 11. *Deny*.

- 12. Admit.
- 13. *Admit in part* that an addendum to the retainer agreement was discussed. *Deny in part* that this specification accurately describes what was discussed.
- 14. Admit.
- 15. *Admit in part* that Maria made the second payment.

  Deny in part that this specification accurately reflects the occurred banks' transactions.
- 16. *Deny*.
- 17. Admit.
- 18. *Admit*.
- 19. *Admit*.
- 20. *Admit*.
- 21. *Admit*.
- 22. *Deny*.
- 23. *Deny*.
- 24. *Deny*.
- 25. *Admit in part*. *Deny in part*. This specification does not accurately reflects the occurred representation.
- 26. *Admit*.
- 27. Admit.
- 28. Admit.
- 29. *Admit in part.*Deny in part. This specification does not accurately reflects the occurred representation.
- 30. Deny violation of Rules 1.1(a), 1.1(b), 1.5 (a), 1.15 (a), 1.15 (b), 1.15 (e), 8.1 (a).

Any matter not specifically admitted is denied.

The Respondent reserves the right to offer evidence in mitigation if the Hearing Committee concludes that any violation has occurred.

Date: July 6, 2020 Respectfully Submitted,

/s./ Michael Alexei
Michael Alexei, Esquire
Respondent
E-mail: malexei@alexeilaw.com

## Certificate of Service

I, Michael Alexei, hereby certify that on this 6th day of July, 2020, I served a copy of this Answer to Specification of Charges with all attachments via e-mail to:

donayrec@dcodc.org Caroll Donayre Somoza, Assistant Disciplinary Counsel of Office of Disciplinary Counsel

/s./ Michael Alexei
Michael Alexei, Esquire
Respondent