ANS
MACDONALD & ASSOCIATES, LTD.
J. SCOTT MACDONALD, ESQ.
Nevada Bar No. 511
6625 W. Sahara Ave., Suite 3
Las Vegas, NV 89146
T: (702) 870-1771
F: (702) 869-0683
scott@jsmaclaw.com
Attorney for Petitioner

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BEFORE THE NEVADA COMMISSION ON JUDICIAL DISCIPLINE

In the Matter of STEVEN E. JONES, Respondent.	Case No. 2006-100

RESPONDENT'S ANSWER TO FORMAL STATEMENT OF CHARGES

COME NOW Respondent, Steven E. Jones, by and through his attorney J. Scott MacDonald, Esq. (appearing in an unbundled capacity for purposes of filing an answer only), and answers the Formal Statement of Charges brought by the Nevada Commission on Judicial discipline as follows:

FACTUAL ALLEGATIONS

1. Respondent admits that on September 3, 2014, he signed a U.S. District Court Plea Agreement and that as a result, on February 26, 2015, Respondent was sentenced to 26 months in the U. S. Federal Correctional Camp located at Taft, California. Respondent denies each and every other allegation contained therein.

COUNT ONE

2. Answering Count 1 of the Formal Statement of Charges, Respondent incorporates by reference his answer to the factual allegations set forth above. Respondent further admits the

entry of a guilty plea in U.S. District Court pursuant to agreement reached with members of the U.S. Attorney's office prosecuting the case. Respondent denies each and every other allegation contained therein.

COUNT TWO

3. Answering Count 2 of the Formal Statement of Charges, Respondent incorporates by reference his answer to the Factual Allegations and Count One set forth above. Respondent further admits the entry of a guilty plea in U.S. District Court pursuant to agreement reached with members of the U.S. Attorney's office prosecuting the case. Respondent denies each and every other allegation contained therein.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

The Commission has failed to state a claim upon which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

The Commissions' claims are barred by the doctrine of laches.

THIRD AFFIRMATIVE DEFENSE

The Commissions' claims are barred by the applicable statute of limitations.

FOURTH AFFIRMATIVE DEFENSE

The Commission's claims should be barred because Respondent is unable to appear and prepare a proper defense to the Formal Statement of Charges due to his incarceration in the State of California.

FIFTH AFFIRMATIVE DEFENSE

Pursuant to NRCP 11 as amended, all possible affirmative defenses may not have been alleged herein insofar as sufficient facts were not available after reasonable inquiry upon the

filing of the Respondent's Answer and therefore Respondent reserves his right to amend his answer to allege additional affirmative defenses, if subsequent investigation so warrants.

WHEREFORE, Respondent prays that the Commission's Formal Statement of Charges be dismissed with prejudice; that judgment be entered in favor of Respondent, his costs of suit incurred herein, and for such other and further relief as the Commission deems just and proper.

DATED this 28 day of October, 2015.

MacDonald & Associates, Ltd.

By: _____

J. Scott MacDonald
Nevada Bar # 511
6625 W. Sahara Ave., Suite 1
Las Vegas, NV 89146
702-870-1771
Attorney for Respondent Steven E. Jones

CERTIFICATE OF SERVICE

I hereby Certify that a true and correct copy of the Answer to Formal Statement of Charges has been forwarded to following parties via U.S. mail, postage pre-paid, on this 28 day of October, 2015.

Commission on Judicial Discipline
PO Box 48
Carson City, NV 89702

Kathleen M. Paustian, Esq.
3205 Skipworth Drive
Las Vegas, NV 89107

MacDonald & Associates, Ltd.

By: _____
J. SCOTT MACDONALD, ESQ.
Nevada Bar No. 511
6625 W. Sahara Ave., Suite 3
Las Vegas, NV 89146
T: (702) 870-1771
F: (702) 869-0683
Attorney for Respondent