

1 WILLIAM B. TERRY, ESQ.  
Nevada State Bar No. 001028  
2 WILLIAM B. TERRY CHARTERED  
530 South Seventh Street  
3 Las Vegas, Nevada 89101  
(702) 385-0799  
4 (702) 385-9788 (Fax)  
Info@WilliamTerryLaw.com  
5 Attorney for Respondent



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7 BEFORE THE NEVADA COMMISSION ON JUDICIAL DISCIPLINE  
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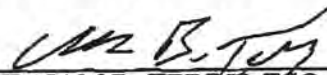
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10 IN THE MATTER OF THE HONORABLE  
11 WILLIAM S. POTTER, Eighth Judicial District  
Court, Department M - Family Court,  
12 County of Clark, State of Nevada  
13 Respondent.

Case No. 2015-013-P

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15 **VERIFIED RESPONSE AND ANSWER**

16 COMES NOW, the Respondent, WILLIAM POTTER, by and through his counsel, WILLIAM  
17 B. TERRY, ESQ., of the law offices of WILLIAM B. TERRY, CHARTERED and files the instant  
18 Verified Response and/or Answer to the above-indicated Complaint.

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24 Las Vegas, Nevada 89101  
(702) 385-0799  
Attorney for Respondent

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Las Vegas, Nevada 89101  
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1 **FACTUAL ALLEGATIONS**

2 In answering the factual allegations, specifically, those allegations set forth within paragraph  
3 A of the Formal Statement of Charges, the Respondent denies he violated Canons 1, 2, 3 and 4 of the  
4 Revised Code of Judicial Conduct ("the Code"). Further, the Respondent denies he violated Canon 1,  
5 Rule 1.1 and Rule 1.2; Canon 2, Rule 2.1, Rule 2.2, Rule 2.4, Rule 2.6(A), Rule 2.8, Rule 2.9 and 2.10;  
6 Canon 3, Rule 3.5 and Rule 3.10; and Canon 4, Rule 4.2(A)(1).

7 In answering the factual allegations, specifically, those allegations set forth within paragraph  
8 B of the Formal Statement of Charges, the Respondent denies he violated Canons 1 and 2 of the  
9 Revised Code of Judicial Conduct ("the Code"). Further, the Respondent denies he violated Canon 1,  
10 Rule 1.1 and Rule 1.2; Canon 2, Rule 2.2, Rule 2.6 and Rule 2.8.

11 **COUNT ONE**

12 In answering those allegations set forth in Count One, the Respondent does deny that he violated  
13 Canon 1, Rule 1.1 and Rule 1.2; Canon 2, Rule 2.1, Rule 2.2, Rule 2.9 and 2.10; Canon 3, Rule 3.5;  
14 and Canon 4, Rule 4.2(A)(1).

15 **COUNT TWO**

16 In answering those allegations set forth in Count Two, the Respondent does deny that he  
17 violated Canon 1, Rule 1.1 and Rule 1.2; Canon 2, Rule 2.2, Rule 2.4, Rule 2.8 and 2.9; and Canon 3,  
18 Rule 3.10.

19 **COUNT THREE**

20 In answering those allegations set forth in Count Three, the Respondent does deny that he  
21 violated Canon 1, Rule 1.1 and Rule 1.2; Canon 2, Rule 2.6(A) and Rule 2.8.

22 **COUNT FOUR**

23 In answering those allegations set forth in Count Four, the Respondent does deny that he  
24 violated Canon 1, Rule 1.1 and Rule 1.2; Canon 2, Rule 2.2, Rule 2.4, Rule 2.6(A) and Rule 2.8.

25 **COUNT FIVE**

26 In answering those allegations set forth in Count Five, the Respondent does deny that he violated  
27 Canon 1, Rule 1.1 and Rule 1.2; Canon 2, Rule 2.2, Rule 2.4, Rule 2.6(A) and Rule 2.8.

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**AFFIRMATIVE DEFENSES**

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In Count One, Complainant fails to specifically allege how Respondent's course of conduct violated each Canon alleged.

In Count Two, Complainant fails to specifically allege how Respondent's course of conduct violated each Canon alleged.

In Count Three, Complainant fails to specifically allege how Respondent's course of conduct violated each Canon alleged.

In Count Four, Complainant fails to specifically allege how Respondent's course of conduct violated each Canon alleged.

In Count Five, Complainant fails to specifically allege how Respondent's course of conduct violated each Canon alleged.

Respondent further asserts that there are mitigating circumstances which should be considered including but not limited to the following:


- (1) Respondent has no prior disciplinary record;
- (2) Respondent has no dishonest and selfish motive;
- (3) Respondent's cooperated free and full disclosure in reference to this investigation and Respondent's cooperation;
- (4) Respondent's character and reputation;
- (7) Respondent's own remorse;
- (5) The delay in the proceedings;

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- (6) The remoteness of some of the allegations; and
- (7) Respondent has also participated in interim rehabilitation by taking classes.

DATED this 12<sup>th</sup> day of May, 2017.

WILLIAM B. TERRY, CHARTERED

  
\_\_\_\_\_  
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**VERIFICATION**

STATE OF NEVADA        )  
                                  ) SS.  
COUNTY OF CLARK        )

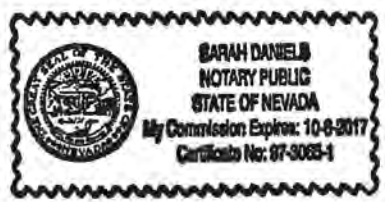
WILLIAM POTTER, being first duly sworn, deposes and says:

That he is the Respondent in the above-entitled action; that he has read the foregoing Verified Response and Answer and knows the contents thereof; that the same is true of his own knowledge except for those matters therein contained stated upon information and belief; and as to those matters, he believes them to be true.

  
WILLIAM POTTER

SUBSCRIBED and SWORN to before me this 12<sup>th</sup> day of May, 2017.

  
NOTARY PUBLIC in and for said County and State



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**CERTIFICATE OF MAILING**

I hereby certify that on the 12<sup>th</sup> day of May, 2017, I, as an employee of WILLIAM B. TERRY, CHARTERED, caused to be served by first class mail, a copy of the foregoing VERIFIED RESPONSE AND ANSWER with postage fully prepaid thereon, by depositing the same with the U.S. Postal Service or official depository for use thereof, addressed as follows:

Thomas C. Bradley, Esq.  
Sinai, Schroeder, Mooeny, Boetsch,  
Bradley and Pace  
448 Hill Street  
Reno, Nevada 89501

  
As an employee of William B. Terry, Chtd.