

1 *Lyn E. Beggs, Esq.*  
2 *Law Offices of Lyn E. Beggs, PLLC*  
3 *Nevada State Bar No. 6248*  
4 *316 California Ave., #863*  
5 *Reno, NV 89509*  
6 *(775) 432-1918*  
7 *lyn@lbeggsllaw.com*  
8 *Attorney for Respondent*



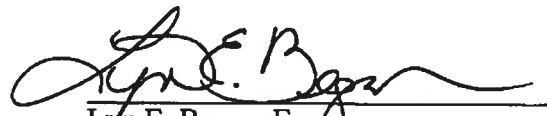
9 **BEFORE THE NEVADA COMMISSION ON JUDICIAL DISCIPLINE**

10 In the Matter of )  
11 )  
12 THE HONORABLE WILLIAM GUS SULLIVAN, )  
13 Pahrump Township Justice Court, )  
14 County of Nye, State of Nevada, )  
15 Respondent. )  
16 \_\_\_\_\_ )

CASE NO. 2017-009-P

17 **VERIFIED RESPONSE AND ANSWER**

18 COMES NOW, WILLIAM GUS SULLIVAN, Justice of the Peace for Pahrump  
19 Township, the Respondent in the above entitled matter, and by and through his counsel, Lyn  
20 E. Beggs, Esq. files the instant Verified Response and Answer setting forth his answers,  
21 affirmative defenses and mitigating factors in response to the Formal Statement of Charges  
22 filed against him on or about January 9, 2018.  
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24   
25 Lyn E. Beggs, Esq.  
26 Law Offices of Lyn E. Beggs, PLLC  
27 316 California Ave., #863  
28 Reno, NV 89509  
(775) 432-1918  
ATTORNEY FOR RESPONDENT

CHARGES OF MISCONDUCT

1 Respondent hereby denies that he has violated Canons 1 and 2 of the Revised Nevada  
2 Code of Judicial Conduct ("Code") as alleged in the Formal Statement of Charges.  
3 Specifically Respondent generally denies that he violated Rules 1.1, 1.2, 2.2, 2.3(A) and (B),  
4 2.4, 2.5(A), 2.6(A), 2.9 (A) and (C) and 2.12 as further set forth below.  
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6 Count One

7 Respondent denies that he violated Judicial Canon 1, Rule 1.1, compliance with the  
8 law, including the Code and Rule 1.2, failing to act at all times in a manner that promotes  
9 public confidence in the independence, integrity and impartiality of the judiciary and avoiding  
10 impropriety and the appearance of impropriety as alleged in Count One of the Formal  
11 Statement of Charges. Respondent denies that he violated Judicial Canon 2, Rule 2.2, failing  
12 to uphold and apply the law, and performing all duties of judicial office fairly and impartially;  
13 Rule 2.5(A), competence, diligence and cooperation; Rule 2.6(A), failing to accord to every  
14 person who has a legal interest in a proceeding, or that person's lawyer, the right to be heard  
15 according to law; Rule 2.12, supervisory duties, as alleged in Count One of the Formal  
16 Statement of Charges.  
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19 Count Two

20 Respondent denies that he violated Judicial Canon 1, Rule 1.1, compliance with the  
21 law, including the Code and Rule 1.2, failing to act at all times in a manner that promotes  
22 public confidence in the independence, integrity and impartiality of the judiciary and avoiding  
23 impropriety and the appearance of impropriety as alleged in Count Two of the Formal  
24 Statement of Charges. Respondent denies that he violated Judicial Canon 2, Rule 2.2, failing  
25 to uphold and apply the law, and performing all duties of judicial office fairly and impartially;  
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1 Rule 2.3(A) and (B), bias; Rule 2.4, external influences on judicial conduct; Rule 2.5(A),  
2 competence, diligence and cooperation; Rule 2.6(A), failing to accord to every person who  
3 has a legal interest in a proceeding, or that person's lawyer, the right to be heard according to  
4 law; Rule 2.9 (A) and (C), ex parte communications/independent investigation, all as set forth  
5 in Count Two of the Formal Statement of Charges.

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7 Count Three

8 Respondent denies that he violated Judicial Canon 1, Rule 1.1, compliance with the  
9 law, including the Code and Rule 1.2, failing to act at all times in a manner that promotes  
10 public confidence in the independence, integrity and impartiality of the judiciary and avoiding  
11 impropriety and the appearance of impropriety as alleged in Count Three of the Formal  
12 Statement of Charges. Respondent denies that he violated Judicial Canon 2, Rule 2.2, failing  
13 to uphold and apply the law, and performing all duties of judicial office fairly and impartially;  
14 Rule 2.3(A) and (B), bias; Rule 2.4, external influences on judicial conduct; Rule 2.5(A),  
15 competence, diligence and cooperation; Rule 2.6(A), failing to accord to every person who  
16 has a legal interest in a proceeding, or that person's lawyer, the right to be heard according to  
17 law, all as set forth in Count Three of the Formal Statement of Charges.  
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20 AFFIRMATIVE DEFENSES

21 Respondent asserts that Count One of the Formal Statement of Charges fails to  
22 specifically identify how his conduct violated each of the cited Canons as alleged.

23 Respondent asserts that Count Two of the Formal Statement of Charges fails to  
24 specifically identify how his conduct violated each of the cited Canons as alleged.  
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26 Respondent asserts that Count Three of the Formal Statement of Charges fails to  
27 specifically identify how his conduct violated each of the cited Canons as alleged.  
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MITIGATING FACTORS

Respondent hereby asserts that there are mitigating factors that are applicable and should be considered in his answering to the allegations contained in the Formal Statement of Charges including, but not limited to, the following:

1. Respondent has no record of any prior discipline;
2. An absence of any dishonest or selfish motive;
3. Respondent has fully cooperated with the Commission on Judicial Discipline;
4. The character and reputation of Respondent;
5. Remorse;
6. Interim rehabilitation; and
7. Any and all other mitigating factors that Respondent may raise during these proceedings.

DATED this 20<sup>th</sup> day of January, 2018.

  
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316 California Ave., #863  
Reno, NV 89509  
(775) 432-1918  
ATTORNEY FOR RESPONDENT

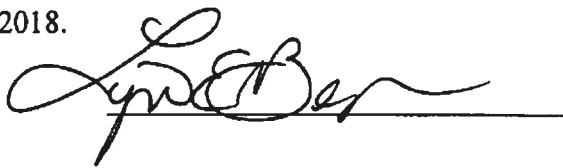


1 **CERTIFICATE OF SERVICE**

2 I hereby certify that that on this date I caused to be served via electronic mail and first  
3 class mail, a copy of the foregoing VERIFIED RESPONSE AND ANSWER with postage  
4 fully prepared thereon, by depositing the same with the U.S. Postal Service to the following:

5 Brian Hutchins, Esq., Prosecuting Officer  
6 BH Consulting, LLC  
7 P.O. Box 2366  
8 Carson City, NV 89702  
9 bhconsultingllc@sbcglobal.net

10 DATED this 20<sup>th</sup> day of January, 2018.

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