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2 Nevada Bar No. 6336
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8 kevin@kevinrhansen.com
9 *Attorney for Respondent*



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

8 **STATE OF NEVADA**

10 IN THE MATTER OF THE HONORABLE 11 SEAN HOEFFGEN, Municipal Court Judge, 12 City of North Las Vegas, State of Nevada,	CASE NO. 2014-122-P
13 Respondent,	

14 **ANSWER TO COMPLAINT**

15 THE HONORABLE SEAN HOEFFGEN, of the North Las Vegas Municipal Court,
16 State of Nevada, by and through his counsel, KEVIN R. HANSEN, ESQ., of the Law Offices of
17 Kevin R. Hansen, and in answer to the Formal Statement of Charges on file herein, admits,
18 denies, avers as follows:

19 **FACTUAL ALLEGATIONS**

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21 A. In response to Paragraph A, although Respondent had entered into a verbal
22 agreement with Municipal Court Judge Catherine Ramsey that the title of Chief Judge would
23 transfer to her, the agreement was terminated after Respondent and Judge Ramsey discussed the
24 issue with Court Administrator Cindy Marshall and the parties agreed that neither would have
25 the title Chief Judge. Respondent denies all other allegations in Paragraph A.

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B. In response to Paragraph B, although Respondent did not respond to certain emails sent to him by Judge Ramsey and there were no judicial meetings for a period of time, Respondent denies the allegation that he refused to cooperate with Judge Ramsey regarding matters to pertaining to the administration of the Court. During the time set forth in Paragraph B, Judge Ramsey had filed a civil lawsuit against the Respondent with the Eighth Judicial District seeking monetary awards. Judge Ramsey, during this period of time, had also misrepresented statements, positions and facts about the Respondent to local media, in pleadings filed with the Eighth Judicial District, and during Respondent’s deposition in a civil matter filed against her. Respondent was under the reasonable belief that any communication with Judge Ramsey would further expose him to further unfounded accusations and harm. Respondent denies all other allegations in Paragraph B.

C. In response to Paragraph C, Respondent denies the allegations in Paragraph C.

D. In response to Paragraph D, Respondent did bring to the attention of the Commission on Judicial Discipline the alleged misconduct of Judge Ramsey regarding her improper actions in dismissing valid bench warrants and failure to appear warrants by filing a Complaint against her with the Commission (Re 2014-092). Respondent denies all other allegations in Paragraph D.

COUNT ONE

Respondent denies any and all allegations contained in Count One.

COUNT TWO

Respondent denies any and all allegations contained in Count Two.

COUNT THREE

Respondent denies any and all allegations contained in Count Three.

COUNT FOUR

Respondent denies any and all allegations contained in Count Four.

AFFIRMATIVE DEFENSES

I.

That Respondent has complied with all applicable laws and at all times has acted in a manner that promotes public confidence in the independence, integrity and impartiality of his office.

II.

That at all times Respondent has performed his judicial duties without bias or prejudice and with competence and integrity.

III.

That Respondent has complied at all times with the Code of Judicial Conduct.

IV.

That Respondent has diligently discharged his administrative responsibilities without bias or prejudice and maintained professional competence in administration of his judicial duties.

V.

That at all times Respondent was acting in compliance and conformity with all statute and law.

VI.

That at all times Respondent acted, to his best ability, to cooperate with his fellow Municipal Court Judge Catherine Ramsey despite steps and actions taken by her to harm his reputation, office and position as a Municipal Court Judge.

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VII.

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That at all times Respondent acted in the best interest of the North Las Vegas Municipal Court, the administration of justice and his duties and responsibilities as a Municipal Court Judge.

DATED this 9 day of MARCH, 2016.



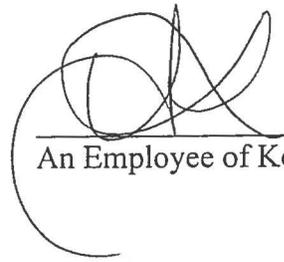
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on the 9th day of MARCH, 2016, and pursuant to NRCPC 5(b), I deposited for mailing in the U.S. Mail a true and correct copy of the Answer postage prepaid and addressed to:

Nevada Commission of Judicial Discipline
P.O. Box 48
Carson City, Nevada 89702

Kathleen M. Paustin, Esq.
Law Office of Kathleen M. Paustin
3205 Skipworth Drive
Las Vegas, Nevada 89107



An Employee of Kevin R. Hansen, Esq.