

DO NOT REMOVE
FROM FILE



BEFORE THE INVESTIGATIVE PANEL
OF THE LAWYER DISCIPLINARY BOARD
STATE OF WEST VIRGINIA

Re: J. Steven Hunter, a member of
The West Virginia State bar

Bar No. 1826
Supreme Court No: 22-0123
I.D.No. 20-06-237

FILE COPY

PRO SE RESPONSE OF J. STEVEN HUNTER

Comes now J. Steven Hunter, pro se, for response to the statement of Charges herein and answers as follows:

A. No title to this section

1. The facts as set out in paragraphs 1, 2, 5, 7, 9, 10, 11, 12, 14, 16, 18, 19, 22, 24 and 27 are admitted.

2. Ms Bordonaro had been a friend of Mr. Raymond L. Peters for nearly 10 years and they had met in Alderson West Virginia. She and Mr Peters had a close relationship and they regularly spent time together on the farm. He had in fact built her a home. She shared times with him over the years and was his means of transport. They saw each other everyday as he walked to her house on the farm

3. Certain emails were made between Stephen L. Peters his son and Ms Bordonaro and she was concerned about his health. Mr. Raymond L. Peters died not on July 11, 2020 but rather on November 23, 2020 alone and unattended at his home.

4. Dr. Chafin performed the evaluation on October 3, 2018. David Hammond, Esquire prepared legal documents changing his designation of Stephen Peters as his POA and for execution of a new Will. Mr Hammond did in fact video Mr. Peters at the

time of the execution of those documents.¹

5. Mrs Winsby did testify as set out in paragraphs 15 and 17 but since her untimely death in an auto accident involving E. Lavoyd Morgan, Jr. her qualifications have become suspect.

6. Raymond L. Peters wrote a check on November 5, 2018 as a retainer and that check was never cashed. Mr. Raymond Peters returned to my office after receiving a letter from Discover that they would no longer honor the signature of Stephen Peters. The second check was written following confirmation with Discover that they would honor his withdrawal request.

7. DeEtta King Hunter is my wife and has been since February 10, 1979. Over those years she has worked in my office with and without pay. The only periods that she had not been in my office a majority of the time was when she served as Mayor of Lewisburg. Since the retirement of my long time paralegal, Barbara Dailey she has been working without pay in my office of Steve Hunter Assoc. L.C. and to satisfy the Secretary of State she is designated as Secretary-Treasurer but of course has no stock ownership. She has an a Bachelors degree in political science and accounting from Fairmont State and a Masters of Public Administration from West Virginia University.

8. As to paragraph 23, the hearing was set and I had received an E-mail to that effect and we then notified the Court of a conflict with David Hammond who was out of

¹The parties were married by the Honorable Jennifer Dent, Circuit Judge in the 11th Judicial Circuit, on August 16, 2020 after having been issued a marriage licence by the County Clerk of Summers County. Those were two independent acts that if Mr. Raymonds Peters was incompetent a Circuit Judge and an experienced County Clerk would have noticed the same. An action for was filed after Mr Raymond Peters death and the same has not been granted.

state in San Francisco and thought the matter had been reset to permit his availability on September 8, 2022. Mrs. Hunter had spoken with the Judge's law clerk or secretary.

9. The Motion for an Expedited stay was in fact filed with the Supreme Court of Appeals on November 7, 2019. Stay was denied as set out in paragraph 28.

10. it is admitted that Stephen Peters counsel sent a letter concerning contact with Mr. Raymond Peters. We had contacted the guardian ad litem telephonically over concerns expressed by Ms. Bordonaro over the care Mr. Peters was and was not receiving. After that one incident no further contact was had by Mrs Hunter. I admonished her but she is an adult and my wife.

11. For response to paragraph 28 the Respondent replies as follows:

A. The respondent did not just "run" into the Judge. He had appeared for what he thought was the hearing on the Bondonaro Motion and was informed by the Court that in fact he hearing had been held the previous Friday. At which point he contacted David Hammond en route and advised there would be no hearing.

B. Admitted.

C. I do not recall saying I represented Raymond Peters but may have done so.

D. Attached is my client Trust Account record indicating there were adequate funds in that account and the \$5,000.00 refund .²

E. Mrs Hunter visited the farm most times to see Mrs. Bordonaro with whom she had developed a close personal friendship and not in any official capacity.

F. She had made trips with the Peters early to City National Bank inquiring of his

A copy of Bank Statement and Check written to Lusk and Peter are attached to this response.

status and grocery shopping.

G. The money was repaid when I called Stephen Peters counsel, Kyle Lusk on December 2, 2022 and was then advised that Mr. Peters had been found dead in his home in November and had been cremated.

12. The Respondent denies any "financial exploitation" of Raymond Peters.

B: ETHICS COMPLAINT AND INVESTIGATION

13. The paragraphs numbered 31, 32,33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, [as to Number 47 there is no evidence of such a phone call and that is directly contrary to Mr. Hammond position.] 48, As to 49 yes Mr. Raymond Peters was very tense, so angry with his sons that "he wished they were dead", stressed and was being consoled by my wife and to help him relax. Yes, any person that knows my wife would say she would do the same for any person. Mr. Stephen Peter's insinuations are an affront to my wife of 43 years and a respected member of our community As to 50 those actions were not under my control or guidance. 51, 52,53, are admitted. Yes I may have made a flippant remark but it was a pure indication that I am not driven by money. I do many hours pro bon work each year. That happens in small rural law office on a regular basis.. Also, I participate regularly in the ABA pro bono program with Kathy Henning.

14. Paragraphs 56, and 56. That is a complete error and has led to the publication of private funds information and an invasion of privacy as to me and my son. I have maintained an IOLTA Client Trust account at City National Bank since required or on my return to private practice in Lewisburg in 1989 after having served four (4) years as General Counsel at the West Virginian Public Service Commission. MY IOLTA

account information is shown on the attached filing. It had over \$70,000.00 during the subject period.

15. As previously noted Mr. Raymond Peters passed away November 23, 2020. A copy of his death certificate noted he appeared to be malnourished at the time his body was discovered and as affirmed by Lantz Funeral Home who handled the arrangements. I was informed by Mr. Lusk on December 2, 2020 and in turn I advised his wife.

16 The statements in Paragraph 58, 59 in so far as filing of documents appear to be accurate. However it is noted that the Document sent to me were not timely received³ and one in our County Clerk's Office in a no longer used document file.

The will contest is an ongoing case before the Summers County Circuit Court.

In addition Stephen Peters filed a third Will that was executed before attorney David Ziegler which also names Karen Bondonaro as a beneficiary and sets up a trust for her and others and provides she may live on the property so long as she desires. A copy of said Will is within the documents proved to the Respondent.

The matter of a Challenge to the self-serving quitclaim Deed to Stephen L Peters and Darrell McCallister.⁴ Stephen L. Peters was the scrivener of that Deed.

Footnote 12 refers to date of the Hammond will. While the Order had been made

³Our long used address was improperly used after being changed by the 911 address changes which was problem with many senders.

⁴Mr McCallister is not related to Raymond Peters in any way and then was designated as the caretaker for him by his son Stephen L. Peters, a resident of Arizona who has failed to account for funds received and spent during his his term as Conservator. A proper Bond was never posted for him as Conservator.

from the bench apparently it had not been reduced to writing and was not for some time. It takes less capacity to make a will than many other documents and deals with the Testator's capacity at the time of making the will. Raymond Peters and Karen Bondonaro had no contact with your Respondent during those times.

In paragraph 60 it is noted that he questioned if Respondent was cognizant while drafting the document. Counsel prepared that document on a laptop while on vacation and did not have a complete file from which to work. Counsel is and was very cognizant. Much to the chagrin of Stephen Peters.

Paragraph 61 is a correct statement. Paragraph 63 is also a correct statement. A copy of the Check is included herewith.

17.. Many rural lawyers use the flat fee arrangements because client want to know their legal fees up front. It is there limit of exposure.

18 Paragraph 65 is a true statement. Ms. Bondonaro owes me nothing and I have refunded the \$5,000.00 to the Raymond Peters Estate through Kyle Lusk.

19. My representation of Mr. Peters, if I ever did, ceased upon the appointment of a guardian ad litem. I disagree with paragraphs 66, 67, 68, 69, 70, 71, 72 and 73. I began representing Ms Bordonaro when she wanted to challenge the appointment of Stephen Peters following the execution of a subsequent power of attorney prepared by David Hammond.

20. I have always in my 49 Years of practice of law to always diligently seek the fair administration of justice.

C. Aggravating Factors

I acknowledge Paragraph 74.

D. Mitigating Factors

1. I have now practiced law for 49 years and will reach hopefully my Fifty year mark on May 17, 2023.

2. I have served as a County Commissioner in Pocahontas County'

3. I have served as a Prosecuting Attorney for eight years in Pocahontas County as then permitted a private practice, since the PA position was only part-time. Also served a Mental Hygiene Commissioner for Pocahontas County by appointment by the Honorable Charles Lobby.

4. I served as General Counsel of the West Virginia Public Service Commission from July 1985 to February 1989. I left that position to return to Greenbrier County, my home, to engage in private practice.

5. I have always been active in my communities serving as the President of both the Pocahontas County Chamber of Commerce and Greenbrier County Chamber of Commerce. I have served as President of both the Marlinton Rotary Club and the Lewisburg Rotary club. I have served all the offices and currently as Trustee of Lewisburg Lodge #1758 of the Benevolent and Protective order of Elks. I am past Master of Greenbrier Lodge 342 of the A.F. & A.M.

I was a member of the United States Southern District Criminal Defense Panel until I resigned due to time constraints and a strong dislike for the Federal Sentencing Guidelines harsh penalties being imposed on young black Americans. Over the years, I have represented many indigent criminal clients.

Also, served for many years as a Commissioner of Accounts and now as a

Fiduciary Commissioner in Greenbrier County.

Of thousands of clients, only a very few have filed complaints. I take them seriously and respect the Office of Disciplinary Counsel. Sad to say I have referred others to your office when they have contacted me with attorney problems.

Respectfully submitted this the 2nd day of May, 2022

J. Steven Hunter, Pro se



J. Steven Hunter
Steve Hunter Associates, I.c.
Counsel for Petitioner
921 Court Street N
Lewisburg, WV 24901
(304) 645-4622
West Virginia State Bar No. 1826
v345@hotmail.com

VERIFICATION

STATE OF WEST VIRGINIA,

COUNTY OF GREENBRIER, TO-WIT:

J. Steven Hunter , being first duly sworn, upon his oath doth depose and say in Greenbrier County, West Virginia, on this date, that he is the Respondent named in the RESPONSE appended hereto, and that the facts and allegations therein contained are

true to the best of his knowledge, information and belief, and that where they are so stated to be upon belief, he believes them to be true.



J. Steven Hunter

Taken, subscribed and sworn to before the undersigned Notary Public in and for the county and state aforesaid, on this 2nd day May 2022.

My commission expires the 9 day of June, 2026.





Notary Public

Served by first class mail May 2, 2020 to.

Kristin P. Halkias, Esq
Office of Disciplinary Counsel
City Center East, Suite 1200C
4700 MacCorkle Avenue, SE
Charleston, WV 25304

Edythe Nash Gaiser, Clerk of Court
State Capitol Rm E-317
1900 Kanawha Blvd. East
Charleston WV 25305



Date 12/31/20

Page 1

THE WEST VIRGINIA STATE BAR
STEVE HUNTER ASSOCIATES L C
CLIENT TRUST ACCOUNT
921 COURT ST NORTH
LEWISBURG WV 24901-1138

For questions about your Statement or Account,
please contact your local branch at: (304) 645-2500

----- Summary of Accounts -----
Account Number Type of Account Current Balance Images
XXXXXX1691 SM BUSINESS INTEREST CHECKING 72,338.46 4

----- Checking Account -----

Account Title: THE WEST VIRGINIA STATE BAR
STEVE HUNTER ASSOCIATES L C
CLIENT TRUST ACCOUNT

SM BUSINESS INTEREST CHECKING		Number of Images	4
Account Number	XXXXXX1691	Statement Dates	12/01/20 thru 12/31/20
Previous Balance	76,958.46	Days in the statement period	31
1 Deposits/Credits	885.32	Average Ledger Balance	72,332.00
4 Checks/Debits	5,511.45	Average Collected Bal	72,309.90
Service Charge	.00	Interest Earned	6.13
Interest Paid	6.13	Annual Percentage Yield Earned	0.10%
Current Balance	72,338.46	2020 Interest Paid	150.60

----- Activity in Date Order -----

Date	Description	Check#	Amount	Balance
12/02	CHECK	11523	5,000.00-	71,958.46
12/15	DEPOSIT		885.32	72,843.78
12/15	CHECK	11524	485.32-	72,358.46
12/21	CHECK	11584	20.00-	72,338.46
12/31	Interest Deposit		6.13	72,344.59
12/31	Interest Transfer Debit		6.13-	72,338.46

Acct No. XXXXXX5729-D

----- Summary by Check Number -----

Date	Check No	Amount	Date	Check No	Amount	Date	Check No	Amount
12/02	11523	5,000.00	12/15	11524	485.32	12/21	11584*	20.00

* Denotes missing check numbers

----- Summary of Deposits -----

Date	Amount	Date	Amount
12/15	885.32	12/31	6.13

Date 12/31/20

Page 2

THE WEST VIRGINIA STATE BAR
STEVE HUNTER ASSOCIATES L C
CLIENT TRUST ACCOUNT
921 COURT ST NORTH
LEWISBURG WV 24901-1138

SM BUSINESS INTEREST CHECKING

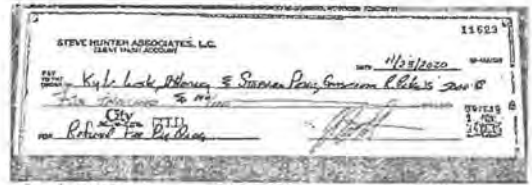
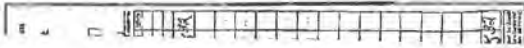
XXXXXX1691 (Continued)

Interest Rate Summary

Date
11/30

Rate
0.100000%

End of Statement



Check 11523 Amount \$5,000.00 Date 12/2/2020

WEST VIRGINIA DEPARTMENT OF HEALTH AND HUMAN RESOURCES
BUREAU FOR PUBLIC HEALTH - VITAL REGISTRATION OFFICE
PHYSICIAN'S / MEDICAL EXAMINER'S CERTIFICATE OF DEATH
350 CAPITOL STREET, ROOM 165, CHARLESTON, WV 25301

1. DECEDENT'S LEGAL NAME (include AKA's if any) (First, Middle, Last) RAYMOND STANLEY PETERS		2. SEX M	3. SOCIAL SECURITY NUMBER 222-18-3615
4a. AGE (Last Birthday) (Years) 87	4b. IF UNDER 1 YEAR Months 0 Days 0 Weeks 0	4c. IF UNDER 1 DAY Hours 0 Minutes 0 Seconds 0	5. DATE OF BIRTH (Mo/Day/Yr) 1/24/1933
6. BIRTHPLACE (City and State or Foreign Country) LAUREL, DELAWARE		7. BIRTHPLACE (City and State or Foreign Country) LAUREL, DELAWARE	
7a. RESIDENCE (STATE) WEST VIRGINIA	7b. COUNTY SUMMERS	7c. CITY OR TOWN ALDERSON	
7d. STREET AND NUMBER 603 SUNRISE LANE	7e. APT. NO. 	7f. ZIP CODE 24910	7g. INSIDE CITY LIMITS? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
7h. 2nd LEGAL RESIDENCE - PROBATE USE ONLY - OPT. 	STREET & NUMBER 	APT. NO. 	CITY OR TOWN
8. EVER IN US ARMED FORCES? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		9. MARITAL STATUS AT TIME OF DEATH <input checked="" type="checkbox"/> Married <input type="checkbox"/> Married, but separated <input type="checkbox"/> Widowed <input type="checkbox"/> Divorced <input type="checkbox"/> Never Married <input type="checkbox"/> Unknown	
10. SURVIVING SPOUSE'S NAME (Give name prior to first marriage.) KAREN BORDONARO		11. FATHERS / PARENT 1'S NAME PRIOR TO FIRST MARRIAGE (First, Middle, Last) RAYMOND SANTIAGO PETERS	
12. MOTHERS / PARENT 2'S NAME PRIOR TO FIRST MARRIAGE (First, Middle, Last) GERTRUDE E. ANDERSON		13a. INFORMANT'S NAME STEPHEN PETERS	
13b. RELATIONSHIP TO DECEDENT SON		13c. MAILING ADDRESS (Street and Number, City, State, Zip Code) 18904 INDIANOLA AVE LITCHFIELD	
14. PLACE OF DEATH (Check only one; see instructions) PARK, AZ 85430			
IF DEATH OCCURRED IN A HOSPITAL: <input type="checkbox"/> Inpatient <input type="checkbox"/> Emergency Room/Outpatient <input type="checkbox"/> Dead on Arrival <input type="checkbox"/> Hospice facility <input type="checkbox"/> Nursing home/Long term care facility <input type="checkbox"/> Decedent's home <input type="checkbox"/> Other (Specify):			
15. FACILITY NAME (if not institution, give street & number) 603 SUNRISE LANE		16. CITY OR TOWN, STATE, AND ZIP CODE ALDERSON, WV 24910	
17. COUNTY OF DEATH SUMMERS		18. METHOD OF DISPOSITION <input checked="" type="checkbox"/> Burial <input type="checkbox"/> Cremation <input type="checkbox"/> Entombment <input type="checkbox"/> Donation <input type="checkbox"/> Removal from State <input type="checkbox"/> Other (Specify):	
19. PLACE OF DISPOSITION (Name of cemetery, crematory, other place) PETERS FAMILY FARM CEMETERY		20. LOCATION (CITY, TOWN, AND STATE) ALDERSON, WV	
21. NAME AND COMPLETE ADDRESS OF FUNERAL FACILITY LANTZ FUNERAL HOME BUCKEYE, WV 24924		22. SIGNATURE OF FUNERAL SERVICE LICENSEE OR PERSON ACTING AS SUCH Douglas D. Hyden	
23. LICENSE NUMBER (Of Licensee) 3722		24. DATE PRONOUNCED DEAD (Mo/Day/Yr) NOVEMBER 23, 2020	
25. TIME PRONOUNCED DEAD 17:46 PM		26. SIGNATURE AND TITLE OF PERSON PRONOUNCING DEATH (Only when pronouncer is NOT also the certifier.) MEDBASE DR. HYDEN	
27. DATE SIGNED (Mo/Day/Yr) NOVEMBER 23, 2020		28. ACTUAL OR PRESUMED DATE OF DEATH (Mo/Day/Yr) NOVEMBER 23, 2020	
29. ACTUAL OR PRESUMED TIME OF DEATH 17:46 PM		30. WAS MEDICAL EXAMINER OR CORONER CONTACTED? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No IF YES, MEDICAL EXAMINER CASE # 20-1753	
CAUSE OF DEATH			
31. PART I. Enter the chain of events - diseases, injuries, or complications that directly caused the death. DO NOT enter terminal events such as cardiac arrest, respiratory arrest, or ventricular fibrillation without showing the etiology. Enter only one cause on a line. Add additional lines if necessary. IMMEDIATE CAUSE (Final disease or condition resulting in death) VASCULAR DEMENTIA, MOD SEVERE Due to (or as a consequence of): Sequentially list conditions, if any, leading to the cause listed on line a. Enter the UNDERLYING CAUSE (disease or injury that initiated the events resulting in death) LAST POOR NUTRITION Due to (or as a consequence of): WIGHT LOSS Due to (or as a consequence of): NA			
PART II. Enter other significant conditions contributing to death but not resulting in the underlying cause in PART I. POOR NUTRITION WIGHT LOSS			
32a. DID TOBACCO USE CONTRIBUTE TO DEATH? <input type="checkbox"/> Yes <input type="checkbox"/> Probably <input checked="" type="checkbox"/> No <input type="checkbox"/> Unknown		32b. IF FEMALE <input type="checkbox"/> Not pregnant within past year <input type="checkbox"/> Pregnant at time of death <input type="checkbox"/> Not pregnant, but pregnant within 42 days of death <input type="checkbox"/> Not pregnant, but pregnant 43 days to 1 year before death <input type="checkbox"/> Unknown if pregnant within the last year	
32c. WAS AN AUTOPSY PERFORMED? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		32d. WERE AUTOPSY FINDINGS AVAILABLE TO COMPLETE THE CAUSE OF DEATH? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
32e. CAUSE/MANNER PENDING? <input type="checkbox"/> Pending investigation <input type="checkbox"/> Date Amended NA See 38b. for Final Manner of Death		32f. FINAL MANNER OF DEATH: <input checked="" type="checkbox"/> Natural <input type="checkbox"/> Accident <input type="checkbox"/> Suicide <input type="checkbox"/> Homicide <input type="checkbox"/> Could not be determined	
32g. DATE OF INJURY (Mo/Day/Yr) NA	32h. TIME OF INJURY NA	32i. PLACE OF INJURY (e.g., Decedent's home, construction site, restaurant, office building, wooded area) NA	32j. INJURY AT WORK? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No NA
32k. LOCATION OF INJURY: Street & Number: NA Apt. No.: NA City or Town: NA State or Country: NA Zip Code: NA			
32l. DESCRIBE HOW INJURY OCCURRED NA			
32m. IF TRANSPORTATION INJURY: ROLE: <input type="checkbox"/> Driver/Operator <input type="checkbox"/> Passenger <input type="checkbox"/> Pedestrian <input type="checkbox"/> Other (Specify): SEATBELT RESTRAINT STATUS: <input type="checkbox"/> Restrained <input type="checkbox"/> No restraint <input type="checkbox"/> Unknown HELMET STATUS: <input type="checkbox"/> Helmet <input type="checkbox"/> No helmet <input type="checkbox"/> Unknown			
37a. CERTIFIER (Check only one): <input type="checkbox"/> Certifying Physician or Qualified APRN - To the best of my knowledge, death occurred due to the cause(s) and manner stated. <input checked="" type="checkbox"/> Pronouncing & Certifying Physician or Qualified APRN - To the best of my knowledge, death occurred at the time, date, and place, and due to the cause(s) and manner stated. <input type="checkbox"/> Medical Examiner/Coroner - On the basis of examination, and/or investigation, my opinion, death occurred at the time, date, and place, and due to the cause(s) and manner stated.			
Signature of Certifier Stacy Ford		Date Certified 11/24/2020	
37b. NAME, ADDRESS, AND ZIP CODE OF PERSON CERTIFYING TO CAUSE OF DEATH Stacy Ford Summers County Circuit Clerk		37c. TITLE OF CERTIFIER APRN 304-457440 <input checked="" type="checkbox"/> MD <input type="checkbox"/> DO <input type="checkbox"/> APRN <input type="checkbox"/> Non-Physician Coroner <input type="checkbox"/> Other, specify	
39. FOR OFFICIAL REGISTRAR USE ONLY - DATE FILED CC-45-2018-G-5 FILED 11/21/2021 11:29 AM			