## BEFORE A HEARING PANEL SUBCOMMITEE OF THE LAWYER DISCIPLINARY BOARD STATE OF WEST VIRGINIA

SCA EFiled: Feb 06 2023 02:45PM EST

**Transaction ID 69082447** 

Re: Jeffery A. Davis, a suspended member

Of the West Virginia State Bar

Bar No. 6247

Supreme Court No. 21-03-363

I.D. No.: 22-03-255

### RESPONDENT'S ANSWER TO THE STATEMENT OF CHARGES

Comes now, Jeffery A. Davis, Respondent, pro se, and does in and for his Answer to the Statement of Charges against the Petitioner, does aver, depose and say:

# Count I I.D. No. 21-03-363 Complaint of the Office of Lawyer Disciplinary Counsel

- 1. With reference to paragraph 4., Petitioner admits the allegation;
- 2. With reference to paragraph 5., Petitioner denies the allegations and asserts that he was removed as counsel for Complainant, Samantha Shafer, on the 26<sup>th</sup> day of October, 2021;
- 3. With reference to paragraph 6., Petitioner denies the allegations and demands strict proof thereof:
- 4. With reference to paragraph 7., Petitioner admits the allegation;
- 5. With reference to paragraph 8., Petitioner is without sufficient information to either admit nor deny the allegation;
- 6. With reference to paragraph 9., Petitioner admits the allegation;
- 7. With reference to paragraph 10., Petitioner admits the allegation;
- 8. With reference to paragraph 11., Petitioner admits the allegation;
- 9. With reference to paragraph 12., Petitioner admits the allegation;
- 10. With reference to paragraph 13., Petitioner admits the allegation;
- 11. With reference to paragraph 14., Petitioner admits the allegation;
- 12. With reference to paragraph 15., Petitioner denies the allegations and demands strict proof thereof;
- 13. With reference to paragraph 16., Petitioner denies the allegations and demands strict proof thereof;
- 14. With reference to paragraph 17., Petitioner denies the allegations and demands strict proof thereof;
- 15. With reference to paragraph 18., Petitioner denies the allegations and demands strict proof thereof; and
- 16. With reference to paragraph 19., Petitioner denies the allegations and demands strict proof thereof.

#### Count II I.D. No. 22-03-255

#### Complaint of the Office of Lawyer Disciplinary Counsel

- 17. With reference to paragraph 20., Petitioner admits in part and denies in part.
- 18. With reference to paragraph 21., Petitioner admits a complaint was filed but denies the allegations contained therein;
- 19. With reference to paragraph 22., Petitioner admits the allegation;
- 20. With reference to paragraph 23., Petitioner admits the allegation;
- 21. With reference to paragraph 24., Petitioner admits the allegation;
- 22. With reference to paragraph 25., Petitioner admits the allegation;
- 23. With reference to paragraph 26., Petitioner admits the allegation;
- 24. With reference to paragraph 27., Petitioner admits the allegation;
- 25. With reference to paragraph 28., Petitioner denies the allegations and demands strict proof thereof;
- 26. With reference to paragraph 29., Petitioner admits the allegation;
- 27. With reference to paragraph 30., Petitioner denies the allegations and demands strict proof thereof;
- 28. With reference to paragraph 31., Petitioner denies the allegations and demands strict proof thereof;
- 29. With reference to paragraph 32., Petitioner denies the allegations and demands strict proof thereof; and
- 30. With reference to paragraph 33., Petitioner admits the allegation.

WHEREFORE, Respondent prays that the Statement of Charges herein be dismissed and such further relief as to the Hearing Panel Subcommittee may deem equitable and just.

Jeffery A. Davis, Petitioner

Pro se

State Bar No. 6247

Post Office Box 175

Wallback, West Virginia 25285

304-587-4228

jeffdavisattorney@gmail.com

#### **VERIFICATION**

State of West Virginia,

County of Clay, to-wit:

I, Jeffery A. Davis, the Respondent named in the foregoing Answer to the Statement of Charges, after being duly sworn, says that the facts and allegations therein contained are true, except so far as they are therein stated to be upon information and belief, and that so far as they therein are stated to be upon information and belief, he believes them to be true.

Jeffery A. Davis

Taken, sworn to and subscribed before me this the \_ 2023, by Jeffery A. Davis.

day of February

My commission expires

Notary Public

OFFICIAL SEAL NOTARY PUBLIC STATE OF WEST VIRGINIA Clarisse Hanshaw PO Box 129 Clay, WV 25043

Septem August 12, 2025

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#### CERTIFICATE OF SERVICE

I, Jeffery A. Davis, Petitioner herein, have this 5<sup>th</sup> day of February 2023 served a true and accurate copy of the forgoing Petitoner's Answer to the Statement of Charges by mailing a copy of the same by regular first class mail to the following:

Renee N. Frymeyer, Esq. Lawyer Disciplinary Counsel Office of Lawyer Disciplinary Counsel West Virginia Judicial Tower Suite 1200 Charleston, WV 25304

Richard A. Pill, Esq. 85 Aikens Center Martinsburg, WV 25404

David A. Wandling, Esq. 1 Washington Avenue, Suite 200 Logan, WV 25601

Cynthia Tawney 3836 Indian Creek Drive Elkview, WV 25701

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