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PAUL G. MAST (CA Bar No. 28390)

[Redacted]

Telephone: [Redacted]

Respondent

**BOARD OF ADMINISTRATION
CALIFORNIA PUBLIC EMPLOYEES' RETIREMENT SYSTEM**

In the matter of the Amount of Proper Benefits Payable to
PAUL G. MAST, Judge, Ret.

AGENCY CASE NO. 2010-0825

OAH NO. 2015-030996

NOTICE OF DEFENSE

Hearing Date: August 31, 2015
Hearing Location: Los Angeles, CA
Settlement Conf: None Scheduled

RESPONDENT PAUL G. MAST HEREBY:

1. DENIES BY WAY OF DEFENSE, each and every allegation in the Statement of Issues, unless otherwise admitted herein.
2. Objects to the Statement of Issues upon the ground that it does not state acts or omissions upon which the agency may proceed.
3. Object to the form of the Statement of Issues on the ground that it is so indefinite or uncertain that the respondent cannot identify the transaction or prepare a defense.



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7. The case before the Office of Administrative Hearings in 1995 and 1996 resulted in a Settlement Agreement attached as Exhibit A to the Statement of Issues. Respondent specifically denies that he at any time violated the non-disclosure statement in said Settlement Agreement. Respondent must point out, even though Respondent did not realize it at the time, that as a fiduciary pursuant to Article 16, Section 17 of the California Constitution, Petitioner was precluded from insisting upon or entering into any such non-disclosure agreement, thus rendering said statement moot.

8. Respondent admits the provisions of Paragraph 2 of the Statement of Issues, except that the date he became a member of JRS should read November 5, 1965.

Respectfully,

March 29, 2015

Paul G Mast

Paul G. Mast



PROOF OF SERVICE

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In the matter of the Amount of Proper Benefits Payable to Paul G. Mast
I am a resident of the State of California, over the age of eighteen years, not a party to
this proceeding.
My residence address is Marci Mast, [REDACTED] [REDACTED] [REDACTED] [REDACTED]
On March 29, 2015, I served the following document(s) by the method indicated below:

NOTICE OF DEFENSE

by e-mailing the document(s) listed above

Jeff Rieger
Harvey L. Leiderman, Esq.
Reed Smith LLP
"Rieger, Jeffrey R." <JRieger@ReedSmith.com>

I declare under penalty of perjury under the laws of the State of California that the
above is true and correct. Executed on March 29, 2015 at Irvine, CA.

Marci G Mast

Marci Mast