
BEFORE THE DISCIPLINARY BOARD
OF THE
SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL

vs.

TANCREDI WILLIAM CALABRESE

Defendant.

:
:
:
:
:
:
:
:
:
:
:

Case Nos. 121 DB 2019 and
32 DB 2020

(Fayette County)

Type of pleading filed:

**RESPONSE TO PETITION FOR
DISCIPLINE**

Pleading filed on behalf of:

Tancredi William Calabrese,
Respondent
Attorney Registration No. 315687

Counsel of Record
for this party:

Thomas W. Shaffer
Attorney at Law
Pa. I.D. No. 87239
11 Pittsburgh Street
Uniontown, PA 15401

www.areyouinjured.info

Dated: December 27, 2023.

**BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA**

OFFICE OF THE DISCIPLINARY COUNSEL	:	
	:	
	:	Petitioner
vs.	:	
	:	Nos. 121 DB 2019 and
	:	32 DB 2020
	:	
TANCREDI WILLIAM CALABRESE,	:	Attorney Registration No. 315687
	:	
	:	
Defendant.	:	(Fayette County)

RESPONSE TO PETITION FOR DISCIPLINE

AND NOW, comes the Defendant, Tancredi William Calabrese, by his attorney, Thomas W. Shaffer, and respectfully presents the within Response to Petition for Discipline. In support hereof, Defendant states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Insofar as it was said but in fact the Respondent never laundered money for anyone including Confidential Informant, Noah Proud. Said statements were made solely so that Respondent could obtain methamphetamine adderall, cocaine, xanax, fentanyl and heroin for his addiction.
8. Admitted.

9. Admitted.
10. Admitted.
11. Admitted.
12. Admitted.
13. Admitted.
14. Admitted.
15. Denied. To the contrary, Respondent and Noah Proud met on two occasions.
16. Admitted.
17. Admitted.
18. Admitted.
19. Denied. This is a question of law, and therefore, no response is required.
20. Admitted.

21. Admitted in part and denied in part. It is admitted that Respondent received money from the CI to form a corporation. It is denied that he formed the corporation for money laundering. He formed the corporation in order to get the CI to pay him so that he could obtain methamphetamine adderall, cocaine, xanax, fentanyl and heroin for his addiction..

22. Admitted.
23. Admitted.
24. Admitted.
25. Admitted.
26. Admitted.
27. Admitted.
28. Admitted.

29. Admitted.
30. Admitted.
31. Admitted.
32. Admitted.
33. Admitted.
34. Admitted.
35. Admitted.
36. Admitted.
37. Admitted.
38. Admitted insofar as Respondent forwarded all the records in his possession to Ms.

Peiffer Morgan. It is denied that they were unrelated to specific request.

39. Admitted.
40. Admitted.
41. Admitted.
42. Admitted.
43. Admitted.
44. Admitted.
45. Admitted.
46. Admitted
47. Admitted.
48. Admitted.
49. Admitted.
50. Admitted

- 51. Admitted.
- 52. Admitted.
- 53. Admitted.
- 54. Denied. To the best of Respondent's information, knowledge and belief, he did perform all tasks required and refunded Mr. Hendrick's \$200.00.

55. Admitted.

56. Admitted.

57. Admitted.

58. Admitted.

59. Admitted.

60. Admitted. Respondent did not maintain a ledger or check register.

61. Admitted.

62. Admitted.

63. Admitted.

64. Admitted.

65. Admitted.

66. Admitted.

67. Admitted.

68. Admitted.

69. Admitted.

70. Admitted.

71. Admitted.

72. Admitted.

73. Admitted.

74. Admitted.

75. Admitted.

76. Admitted.

77. Admitted.

78. Admitted.

79. Denied. Paragraph 79 is a legal conclusion, and therefore, no response is required.

80. Admitted.

81. Admitted.

82. Admitted.

83. Admitted.

84. Admitted.

85. Admitted.

86. Admitted.

87. Admitted.

88. Admitted.

89. Admitted.

90. Admitted.

91. Admitted.

92. Admitted.

93. Admitted.

94. Admitted.

95. Admitted.

96. Admitted.

97. Denied. Respondent is without sufficient information, knowledge or belief to form an opinion as to the truth of the matter asserted.

98. Admitted.

99. Admitted.

100. Admitted.

101. Denied. Respondent is without sufficient information, knowledge or belief to form an opinion as to the truth of the matter asserted.

102. Admitted.

103. Admitted.

104. Admitted.

105. Admitted.

106. Admitted.

107. Admitted.

108. Admitted.

109. Admitted.

110. Admitted.

111. Admitted.

112. Admitted.

113. Admitted.

114. Admitted.

115. Admitted.

116. Admitted.
117. Admitted.
118. Admitted.
119. Admitted.
120. Admitted.
121. Admitted.
122. Admitted.
123. Admitted.
124. Admitted.
125. Admitted.
126. Admitted.
127. Admitted.
128. Admitted.
129. Admitted.
130. Admitted.
131. Admitted.
132. Admitted.
133. Admitted.
134. Admitted.
135. Admitted.
136. Admitted.
137. Admitted.
138. Admitted.

139. Admitted.
140. Admitted.
141. Admitted.
142. Admitted.
143. Admitted.
144. Admitted.
145. Admitted.
146. Admitted.
147. Admitted.
148. Admitted.
149. Admitted.
150. Admitted.
151. Admitted.
152. Admitted.
153. Admitted.
154. Admitted.
155. Admitted.
156. Admitted.
157. Admitted.
158. Admitted.
159. Admitted.

160. Denied. Respondent is without sufficient information, knowledge or belief to form an opinion as to the truth of the matter asserted.

161. Admitted.

Respectfully submitted,

Thomas W. Shaffer,
Counsel for Respondent

CERTIFICATE OF COMPLIANCE

I, certify that this filing complies with the provisions of *Public Access Policy Unified Judicial System of Pennsylvania; Case Records of the Appellate and Trial Courts* that require confidential information and documents differently than non-confidential information and documents.

Submitted by: Thomas W. Shaffer, Esquire

Signature: _____

Attorney for Respondent

Attorney No: 87239

BEFORE THE DISCIPLINARY BOARD OF THE
SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL :
 :
vs. : Nos. 121 DB 2019 and
 : 32 DB 2020
 :
TANCREDI WILLIAM CALABRESE, : Attorney Registration No. 315687
 :
Defendant. : (Fayette County)

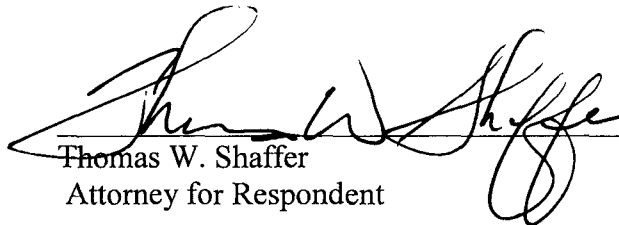
CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the within document upon the following:

Service by first class mail:

James M. Fox
Disciplinary Counsel-in-Charge
Disciplinary Board of the Supreme Court
Suite 1300, Frick Building
437 Grant Street
Pittsburgh PA 15219


Date: December 27, 2023.


Thomas W. Shaffer
Attorney for Respondent

VERIFICATION

I, Tancredi Calabrese, hereby verify that the statements contained in the within Response to Petition for Discipline are true and correct to the best of my knowledge information and belief.

I understand that false statements are made subject to the penalty of Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.


Tancredi Calabrese