

To the Attorney Regulation Committee: Regulation Counsel Office

Request for Investigation, Verified Notice of Misconduct, and Petition to
Suspend the License to Practice of Katherine Grier for Cause

Complainant:

Charles Harry Clements
1741 Dallas Street
Aurora, Adams County, Colorado

against

Respondent:

Katherine Grier, J.D. Register Number 30948
2701 Alcott St. #482
Denver, CO 80211

Rule 241.12. Complaint (2) Pursuant to C.R.C.P. 241.11 (a)(2), (a)(3), or (a)(4) by any complainant in the complainant's own name. Complainant Charles Harry Clements is an adult; of sound mind and tells the truth, has firsthand knowledge and respectfully declares as follows;

Pursuant to C.R.C.P. Rule 241.9 (1), Charles Harry Clements requests the Attorney Regulatory Counsel to initiate an investigation of the above listed party, Katherine Grier, a lawyer, for unethical behavior by act or omission and professional misconduct.

Pursuant to C.R.C.P. Rule 241.8 "...or because *he has engaged in conduct which poses an immediate threat to the effective administration of justice*, the Supreme Court may order the lawyer's license to practice law immediately suspended."

Charles Harry Clements recommends and requests the immediate suspension of the License to Practice Law of the above listed party, Katherine Grier, as her continued practice of law constitutes an immediate threat to the effective administration of justice.

Rule 241.9. Request for Investigation (b) (1) The above listed attorney Katherine Grier is subject to the jurisdiction of the State Supreme Court of Colorado; the lawyer, Katherine Grier, is before the Colorado Bar

Rule 241.9. Request for Investigation (b) (2) The allegations, when proved, will constitute grounds for severe disciplinary action against Katherine Grier.

Rule 241.12. Complaint (b) Service of Complaint. The Disciplinary Counsel shall promptly serve the respondent, Katherine Grier, J.D., as provided in C.R.C.P. 241.25 (b), a citation and a copy of the complaint filed against the respondent.

Rule 241.6. Grounds for Discipline

Misconduct by a lawyer, individually or in concert with others, including the following acts or omissions, shall constitute grounds for discipline, whether or not the act or omission occurred in the course of an attorney-client relationship:

- (1) Any act or omission which violates the provisions of the Code of Professional Responsibility or the Colorado Rules of Professional Conduct;
- (2) Any act or omission which violates accepted rules or standards of legal ethics;
- (3) Any act or omission which violates the highest standards of honesty, justice, or morality;
- (6) Any act or omission which violates these Rules or which violates an order of discipline or disability;

Rule 8.4. Misconduct

It is professional misconduct for a lawyer to:

- (a) violate or attempt to violate the rules of professional conduct, knowingly assist or induce another to do so, or do so through the act of another;
- (c) engage in conduct involving dishonesty, fraud, deceit or misrepresentation;
- (d) engage in conduct that is prejudicial to the administration of justice;
- (f) knowingly assist a judge or judicial officer in conduct that is a violation of applicable rules of judicial conduct or other law;
- (g) engage in conduct which violates accepted standards of legal ethics;

The enumeration of acts and omissions constituting grounds for discipline is not exclusive, and other acts or omissions amounting to unprofessional conduct may constitute grounds for discipline.

Offenses involving violence, dishonesty, or breach of trust, or serious interference with the administration of justice are in that category. A pattern of repeated offenses, even ones of minor significance when considered separately, can indicate indifference to legal obligation.

Exhibits:

1. All documentation is presently being held by Attorney Thomas Cecil Miller, #22652 and access is denied to Complainant.
2. Complainant offers testimony by:
Thomas Cecil Miller, J.D., #22652; as to his witness of Court proceedings, documentation, and the conversations of 4 March, 2004
Steve Douglas Gartin, Docslaw Research Assistant; as to the phone conversation, subsequent discussion in the vehicle, subsequent discussion with Complainant at Complainant's home.
Charles Harry Clements, Complainant
3. Time stamped copies of e-mail from the span of time to present

1. Katherine Grier intentionally failed and neglected to notify Complainant about any pending meetings to alter or adjust the Court's Permanent Restraining Order in order to gain an advantage over an unrepresented party as well as to **actively conceal Ms. Lawler's penchant for violence and emotional and physical abuse of her family**, and her continuing heedless contempt for the Court's Order, so as to materially mislead the Court, and is a violation of Rule 8.4, Rule 3.5 (a) (b)

2. Katherine Grier intentionally failed and neglected to notify Complainant about any pending meeting to change the Court's Custody Order in order to **gain an improper advantage over an unrepresented party**, and to actively and deceptively mislead the Court about material evidence, and is a violation of Rule 8.4 (c), (d) (g)

3. Katherine Grier intentionally failed and neglected to notify Complainant about any pending meeting for her Client, **Victoria Leslie Lawler, to answer some three dozen charged incidents of contempt of the court's Restraining Order, in order to gain an improper advantage over an unrepresented party**, and to actively and **deceptively mislead the Court** about material evidence, and is a violation of Rule 8.4 (c), (d) (g)

4. Katherine Grier's phone conversation to Attorney Thomas C. Miller, of 4 March, 2004, was to **threaten unfounded criminal prosecution** unrelated to the instant question, as well as instant, malicious and unwarranted incarceration, *in order to gain improper advantage* in a civil action and to **extort Complainant to accede to her demands for money**, goods and acquiescence, and is a violation of Rule 8.4. Misconduct. (a through (h) inclusive, Rule 4.5 (a)

5. Katherine Grier's phone conversation of 4 March, 2004, was an assertion of her improper influence on, as well as judicial bias by, one or more **judicial officers of the County of Adams** in violation of Rule 8.4 (e) and (f), Rule 8.2 (a)

6. The failure to report the judicial officer or officers is a violation of Rule 8.3. (b), Rule 8.4 (e) and (f)

7. The **failure to report** herself, Katherine Grier, for improprieties admitted to in Court, is a violation of Rule 8.3 (a)

From Commentary

"Self-regulation of the legal profession requires that members of the profession initiate disciplinary investigation when they know of a violation of the Rules of Professional Conduct. Lawyers have a similar obligation with respect to judicial misconduct. An apparently isolated violation may indicate a pattern of misconduct that only a disciplinary investigation can uncover. Reporting a violation is especially important where the victim is unlikely to discover the offense."

8. The failure of Katherine Grier to report Thomas C. Miller for his **collusion** with her, adverse his client's interests, is a violation of Rule 8.3

9. Katherine Grier has **failed or neglected to keep her Client, Victoria Leslie Lawler, apprised of current and material information** necessary for her considered and deliberate decisions as regards our progeny, their welfare and care in violation of Rule 1.3 (a) (b)??

The above enumerated Rules are simply suggestions for investigation, and other and further rules may find appropriate application to the circumstances.

Complainant includes the forgoing in its entirety and incorporates it as if fully reproduced herein and declares;

Complainant Charles Harry Clements states the following as fact;

1. Complainant obtained **Permanent Restraining Order against Attorney Katherine Grier's Client, Victoria Leslie Lawler**, on behalf of Complainant and Complainant's progeny; Charles Hunter Clements and Mason William Clements, in Adams County Colorado. Complainant presented witnesses and testimony sufficient for the Judge to issue a Permanent Restraining Order. Complainant makes proffer of proof by Court's record in possession of Attorney Thomas C. Miller.
2. Complainant obtained a **Custody Order** for both boys incident to the **Permanent Restraining Order** in Adams County Colorado
3. Complainant noted some three dozen violations of the Permanent Restraining Order in two Complaints to the Court and by Police Report.
4. Katherine Grier, J.D., had one or more **ex parte meetings with one or more Adams County Judges** concerning both the Permanent Restraining Order and the Custody Order, and the Complaints of Contempt of the Court's Order. Complainant makes proffer of proof by Court record of about 13 April, 2003 in possession of Attorney Thomas C. Miller, the recorded admissions by Respondent Grier, and the Orders issued by the Court.
5. Katherine Grier, J.D., failed and **neglected to notify** Complainant of the pending meetings to his detriment and damage as well as to the detriment and damage of the two minor-aged boys.
6. Katherine Grier has admitted on the Court's record of about 13 April, 2004, her **failure and neglect to notify Complainant** on each and every occasion of such pending meetings. Complainant makes a proffer of proof by the court transcript in possession of Thomas C. Miller, and by eye-witnesses Thomas C. Miller and Complainant
7. Attorney Thomas C. Miller is Complainant's counsel of record.
8. Katherine Grier, J.D., made a **phone call** to Complainant's attorney, Thomas C. Miller on Saturday, 4 March, 2004, which **phone call was witnessed** by a third party. Complainant makes a proffer of proof by the above listed witnesses and by copy of electronic mail as time stamped and dated.
9. Katherine Grier's phone call to Attorney Miller related the active prejudice and bias by the Adams County Judiciary towards Complainant; **threatened criminal charging** by the judge and immediate incarceration of Complainant for any failure to appear without a lawyer, or to file pro se submissions to the Court, or to file pro se submissions to the Supreme Court; and Attorney Grier's willingness to exploit that bias to extort significant amounts of money and compliance from Complainant. Proffer of proof by testimony from Thomas C. Miller, Steve D. Gartin and Complainant; and time stamped electronic transfer documentation detailing the procession of events.
10. Attorney Miller acted collusively upon Attorney Grier's information, actively soliciting Complainant's decisions as based on **Attorney Grier's threats** and the **bias** of the Adams County judiciary, as identified from **Chief Judge Harlan Bockman** on to the presiding Magistrates.

Allegations of Misconduct:

Complainant, Charles Harry Clements, relies on the above noted facts and alleges the following is true and constitutes cause for the Attorney Regulatory Counsel to sanction Respondent Katherine Grier;

Katherine Grier has failed to conduct herself, by both commission and omission, to even the minimal standards of professional conduct and ethical rigor, so as to demonstrate an unfitness to practice, unsupervised, amongst ethical practitioners; and to impede, mislead, injure and defame the legal process and administration of justice by malfeasance as an honored representative of the Legal Profession.

Her continued practice would tend to bring opprobrium upon the Legal Profession, to hold our system of jurisprudence to ridicule, and to add to the widespread and unfortunate public perception of the integrity of the system and its Senior administrators.

This Request for Investigation, Verified Notice of Misconduct, and Petition to Suspend the License to Practice of Katherine Grier for Cause is based on the very best of my firm belief and attested by the record of the Court, eye-witness, and the practical applications of the Orders of the Court.

I declare it to be truthful and without any intent to deceive or mislead.

Complainant: **Charles Harry Clements**

Sunday, June 27, 2004

Notary

State of Colorado)
) ss.
County of _____)

Affirmed and Attested to before me by Charles Harry Clements on the 28th day of June, 2004.

Notary Public

My commission expires:_____

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