

Boulder County Court--Longmont, State of Colorado 1035 Kimbark St., Longmont, CO 80501	DATE FILED October 1, 2026 12:19 AM FILING ID: 4316C46E9CC76 CASE NUMBER: 2026C30734 ▲ COURT USE ONLY ▲
Petitioner: Christopher S.P. Gregory v. Respondent: Michael Dougherty	
Counsel for Christopher S.P. Gregory: The Gregory Law Firm, LLC Christopher S.P. Gregory, esq. 201 Coffman St., #1822 Longmont, CO 80502 Phone: (970) 648-0642 Fax: (970) 648-0643 E-Mail: cspgregory@thegregorylawfirm.net Atty. Reg. # 37095	Case No: Division: 11
DECLARATION OF INGRID J. DEFRANCO	

State of Colorado)
)
County of Adams)

Ingrid J. DeFranco, Colo. Atty. Reg. No. 31206 (“Declarant”) being of lawful age, of sound mind, and declaring under penalty of perjury,¹ deposes and says the following:

1. My name is Ingrid DeFranco. I was admitted to the practice of law in the state of Colorado, in 1999. After a career is an organic chemist, ended in heavy – metal poisoning, I entered law school at the University of Colorado at Boulder, intending to do capital defense work. In December of my first year, I went to work for a capital defense attorney couple, and remained with them, throughout law school, bar preparation, the bar exam, and after my admission to the bar. I continued to do capital defense work at every level, state and federal, for approximately the next 17 years. I have handled thirteen capital cases, without a loss.
2. In my nearly 30 years as a practicing attorney, I have only had one ethical issue. That was many years ago, when for reasons I still am not clear on, my trust account had an

¹ This unsworn declaration is presented in lieu of an affidavit, as allowed by C.R.C.P. 108.

overdraft for approximately 12 hours. I had written a check to a client, and it did not clear. I had him paid in cash, before the overdraft was ever reported, and after being contacted by OARC, I explained, provided documentation, and they closed the file, with no action taken.

3. I represent my fellow attorney Christopher Gregory as co-counsel in various suits against Colorado judicial, and executive, officials, whom we know to have engaged in serious misconduct, including federal offenses, and whom we believe we have both the right and the duty, to hold accountable. More particularly, we believe that Colorado voters have the absolute right to know about the misconduct of high-ranking government officials, and to make reasoned decisions based on information that is being systematically, deliberately, and corruptly withheld from them.
4. Our attempts to hold judicial officials, the Office of the Attorney General, its principals and deputies, and individuals involved in judicial discipline accountable, and to require them to recognize their conflicts of interest, which forbid them to continue to litigate these cases, have recently culminated in the Office of Attorney Regulation Counsel (OARC) opening investigations into both Mr. Gregory and me. As far as I am able to ascertain, the basis for the investigation is a wholly – fabricated scenario, in which OARC contends that Mr. Gregory falsely attested to having returned documents, in fact, retained those documents, and is attempting to use them, to violate privacy interests, which do not exist. To the best of my knowledge, Mr. Gregory has no such documents, and has given me his word that that is the case. Indeed, Mr. Gregory has repeatedly demanded that Attorney General Philip Weiser return Mr. Gregory's records which remain in the Colorado Attorney General's Office's possession. I have known Mr. Gregory for some years and have never known him to dissemble or lie. Mr. Gregory addresses these allegations separately and directly through his own Declaration to Compel Prosecution Under § 16-5-209, C.R.S. Despite Mr. Gregory and I having requested the disqualification of the Colorado Supreme Court, OARC which it controls, and conflicted Presiding Disciplinary Judges, only PDJ Bryon Large has recused himself. Even that recusal occurred with PDJ Large referring the matter to the Justices so that they could directly appoint former Justice Alex J. Martinez as a special PDJ. The non-disqualification of the Colorado Supreme Court and individuals associated with the Justices is structural error and a blatant deprivation of due process under the Fourteenth Amendment to the U.S. Constitution and Article II, § 25 of the Colorado Constitution. *Williams v. Pennsylvania*, 579 U.S. 1 (2016). The Justices' refusal to disqualify themselves despite being the subject of allegations of serious judicial misconduct is also contrary to the expressed will of the 73% majority of Colorado voters who ratified Amendment H in 2024, mandating formation of a special tribunal according to Article VI, § 23(3)(f)(II) of the Colorado Constitution.
5. In May 2026, at 71, I was diagnosed with pancreatic cancer, and immediately began chemotherapy. It is a very rigorous regimen, and I have been very ill since June. I have had to withdraw from cases, and send clients to other attorneys, in order to continue to work with Mr. Gregory, but these cases have priority.

6. Recently, after the sham investigation was announced by the OARC, and the prosecutor attempted to obtain a gag order against me, to keep me from publicizing what they are doing to me, I suffered a severe exacerbation of side effects from the chemotherapy, which has made me unable, continually, to use my hands, and caused me to have to discontinue the chemotherapy, temporarily. I am also nearly unable to walk, or to eat. I have continuous insufficient oxygen on room air, and am required to have supplemental oxygen at all times. The OARC's sham investigation has caused such severe emotional distress, that I am not at all certain I can continue in chemotherapy, and I have had suicidal ideation. Facing these unwarranted threats to my sterling reputation and livelihood, has been devastating.
7. If I had earned this, in any way, or by any mis- or malfeasance, I would not have the temerity to seek relief from this Court. I have not. I need the retaliation to stop, and I do not know of another route to put a stop to it.
8. I respectfully request that this Court enter the protection orders that Mr. Gregory and I am seeking, and enjoin the Justices, Attorney General Weiser, the OARC prosecutors, and the other complicit public officials from threatening my very life, at least until such time, as I have recovered some stamina.

I declare under penalty of perjury under the laws of the State of Colorado that the foregoing statements made in this Declaration are true and correct to the best of my knowledge.

Executed on the 30th day of September, 2026, at Brighton, Colorado.



Ingrid J. DeFranco