

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
SUPPLEMENT TO VERIFIED COMPLAINT FOR CIVIL PROTECTION ORDER	

Comes now, the Petitioner in the above-captioned action, *in pro per*, and respectfully moves that this Court grant the relief requested in Petitioner's accompanying Verified Complaint for Civil Protective Order, specifically temporary and later permanent civil protective orders that prevent the respective Respondents from engaging in further witness and/or victim intimidation and retaliation.

Petitioner brings his Verified Complaint with related complaints against similarly situated Respondents who have all unlawfully refused to disqualify themselves and/or have obstructed (through intimidation, retaliation, deliberate disregard, or otherwise) legitimate conflict-free investigation of the well-documented judicial, attorney, and official misconduct which Petitioner alleges. Petitioner maintains that the Respondents' response to these allegations rises to the level

of criminality and requires compelled prosecution.¹ Accordingly, Petitioner further accompanies his Verified Complaint with his “Declaration of Chirstopher S.P. Gregory to Compel Prosecution Under § 16-5-209, C.R.S.; Exhibits 1-21,” which Petitioner incorporates by reference as grounds for the relief requested here. *See also In re Marriage of Wiggs*, 2025 COA 10, ¶ 27 (recognizing that § 13-14-106(1)(a), C.R.S. does not define harassment; applying criminal definition according to § 18-9-111(1), C.R.S.).

Petitioner has exposed a more than 25-year ongoing pattern of public corruption through which the Justices of the Colorado Supreme Court and other public officials have methodically misused millions of taxpayer dollars and the authority of their positions to cover up serious judicial, attorney, and official misconduct. The public fraud has included taxpayer-funded hush money contracts (i.e. NDAs), self-controlled investigations, and public relations schemes. Under almost mirrored circumstances, New Hampshire Chief Justice Gordon J. MacDonald was disciplined and required to resign on September 15, 2026. *Compare Matter of Coats*, 2023 CO 44 *with Matter of MacDonald*, JD-2026-004 (N.H. Sept. 15, 2026). There is a sufficient basis for the immediate suspension of all the Justices of the Colorado Supreme Court and Adams County Court Judge Leroy Kirby under Colo. RJD 34 pending judicial discipline proceedings to seek their removal from the bench. Alternatively, there is a sufficient basis for the Colorado

¹ Criminal laws aside, the Colorado Code of Judicial Conduct recognizes that judges are mandated to report misconduct and to otherwise enforce the law, including the ethical standards for judges and attorneys. Comment 2 to Canon Rule 2.15 (Responding to Judicial and Lawyer Misconduct) reinforces the irreparable harm that occurs when substantial judicial, attorney, and official misconduct is rug swept. Comment 2 states, in relevant part:

Ignoring or denying known misconduct among one's judicial colleagues or members of the legal profession undermines a judge's responsibility to participate in efforts to ensure public respect for the justice system.

General Assembly to initiate impeachment proceedings against the Justices and Judge Kirby under Colo. Const. Art. XIII. Although Petitioner has attempted to raise his verified allegations of public corruption and public fraud through all the appropriate channels, his reporting has almost invariably been met with the oversight entities responsible deliberately disregarding the allegations, refusing to disqualify, refusing to investigate, and/or summarily dismissing the complaints. This refusal to disqualify, investigate, and/or prosecute the verified misconduct is part of the ongoing stalking, harassment, and retaliation that Petitioner and his co-counsel are experiencing.

Instead of Petitioner receiving a fair opportunity to be heard in response to his mandated reporting of judicial, attorney, and official misconduct, the Respondents have consistently responded with a pattern of misconduct that includes their methodical efforts to intimidate, harass, and retaliate against Petitioner and others who have reported misconduct. This pattern of harassment, which meets the definition of stalking under § 18-3-602, C.R.S.,² is further

² To prove the crime of Stalking, a prosecutor would need to establish that the defendant:

- 1) Knowingly,
- 2) Made a credible threat to another person, either directly, or indirectly through a third person, and
- 3) In connection with the threat, repeatedly contacted that person, a member of that person's immediate family, or someone with whom that person was having or previously had a continuing relationship.

As stated in § 18-3-602, C.R.S., a "continuing relationship" is expansive and not limited to intimate or familial relationships.

Alternatively, the crime of Stalking can be proven by establishing that the defendant:

- 1) Knowingly and repeatedly,
- 2) Contacts or makes any form of communication with,
- 3) Another person, a member of that person's immediate family, or someone with whom that person has or has had a continuing relationship,

documented in Petitioner's accompanying Declaration to Compel Prosecution. The most significant example of the retaliation occurred when Petitioner was wrongfully terminated as Executive Director of the Colorado Commission on Judicial Discipline (the CCJD) and threatened with criminal charges, a search warrant, and civil proceedings if he did not surrender his copy of records created as Executive Director. The stalking, harassment, and retaliation continued with the Respondents respectively refusing to disqualify themselves from matters involving their own misconduct and/or when non-disqualification has been willfully used to cover up the misconduct of others. The most recent example of stalking, harassment, and intimidation has occurred through Attorney General Philip Weiser, who is abusing the resources of his Office to represent himself and the other individual capacity defendants in *Gregory v. Colo. Jud. Discipline Rulemaking Comm., et al.*, 1:25-cv-03361-KHV-GEB (D. Colo.), filing an attorney grievance and seeking to have Petitioner held in contempt for revealing Judge Kirby's admitted misconduct and disciplinary history (i.e. an inappropriate/unreported relationship with court staff that included sex in the courthouse and persistent dishonesty). The Justices, in turn, have initiated and allowed secret "investigations" of Petitioner and his co-counsel, Ingrid J. DeFranco, to move forward notwithstanding objections that the Justices, the Colorado Supreme Court's Office of Attorney Regulation Counsel (OARC), and the Presiding Disciplinary Judge (PDJ) must all disqualify themselves according to Colo. Const. Art. VI, § 23(3)(f)(II), (h), Colo. RJD 41, C.R.C.P. 242.4 (Legal Regulation Committee's authority to appoint special counsel),

4) In a manner that would cause a reasonable person to suffer serious emotional distress, and

5) That person, a member of that person's immediate family, or someone with whom that person has or has had a continuing relationship suffered serious emotional distress.

§ 18-3-602(7), C.R.S. imposes an express duty on law enforcement to promptly and diligently investigate reported stalking.

C.R.C.P. 242.5(f) (OARC's obligations to disqualify), C.R.C.P. 242.6(d) (disqualification of PDJ), and C.R.C.P. 242.37.5 (disqualification of Colorado Supreme Court and required formation of special tribunal). With PDJ Bryon Large having disqualified himself, the Justices have proceeded to directly appoint former Justice Alex J. Martinez as a special PDJ. The same grounds exist for Justice Martinez to disqualify himself, yet he has accepted the appointment and is complicit in the Justices' apparent efforts to resurrect the Star Chamber as a means of secretly depriving Petitioner and his co-counsel of due process, public court proceedings, and freedom from prior restraints. The deprivation of Petitioner's and his co-counsel's individual rights is violative of the First and Fourteenth Amendments to the U.S. Constitution and Colo. Const. Art. II, §§ 3, 6, 10, 24, and 25.

The Respondents' collective intimidation tactics have caused both Petitioner and his co-counsel, who is an at-risk adult based upon her age and medical conditions,³ to suffer serious emotional distress. The impacts of Respondents' ongoing conduct are verified through the accompanying "Declaration of Ingrid J. DeFranco."

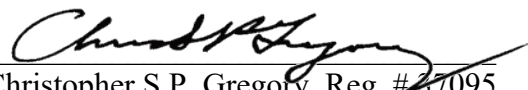
According to § 13-14-104.5(7)(a), C.R.S., Petitioner has the initial burden of presenting evidence that there is a risk or threat of physical, psychological, or emotional harm to him or another person for whom the civil protection order is sought. In order for Petitioner to seek the conversion of a temporary civil protection order into a permanent civil protection order

³ § 13-14-101(1), C.R.S. defines "Abuse of the elderly or of an at-risk adult" as "mistreatment of a person who is sixty years of age or older or who is an at-risk adult" through repeated acts that "constitute verbal threats" or "constitute verbal harassment." An "at-risk adult" is further defined to include any individual eighteen years or older who is susceptible to mistreatment or self-neglect because the individual is "unable to perform . . . services necessary for his or her health, safety, or welfare." A temporary disability caused by a medical condition meets this definition. Ms. DeFranco meets the criteria for an elderly or at-risk adult because she is 71 years old and is currently receiving oncology treatment, including temporarily debilitating chemotherapy.

according to § 13-14-106(1)(a), C.R.S., Petitioner will need to present further evidence satisfying the following elements: 1. The respondent has committed acts constituting grounds for the issuance of a civil protection order (i.e. stalking, harassment, and/or elder abuse / abuse of at-risk adult as enumerated in § 13-14-104.5, C.R.S.), and 2. Unless restrained, the respondent will continue to commit those acts or acts designed to intimidate or retaliate against the protected person. The burden of proof for a permanent civil protection order does not require findings of imminent danger or harm. *Wiggs*, ¶ 28 (reasonable likelihood of recurrence rather than imminence critical factor).

Petitioner's Verified Complaint and proposed Temporary Civil Protection Order and Citation are limited to requesting orders that prohibit further witness/victim intimidation and retaliation by the Respondents. There is ample evidence to support this requested relief. Petitioner respectfully requests that this Court enter a Temporary Civil Protection Order according to § 13-14-104.5(7)(a), C.R.S. and set this matter for a further hearing on Petitioner's request for a permanent civil protection order that includes consideration of Petitioner's accompanying "Declaration of Christopher S.P. Gregory to Compel Prosecution Under § 16-5-209, C.R.S."

Respectfully submitted,


Christopher S.P. Gregory, Reg. # 57095
Attorney *Pro Per* for Petitioner