

Verified ☒ Complaint ☐ Motion for Civil Protection Order	
Court: ☒ County ☐ District ☐ Juvenile ☐ Probate. ☐ Municipal <u>Boulder</u> County, Colorado Court Address: <u>1035 Kimbark St.</u> <u>Longmont, CO 80501</u>	DATE FILED October 1, 2026 12:19 AM FILING ID: 4316C46E9CC76 CASE NUMBER: 2026C30734
Petitioner: <u>Christopher S.P. Gregory</u> v. Respondent: <u>Michael Dougherty, in his individual capacity</u>	▲ COURT USE ONLY ▲
Filer Information Name: Christopher S.P. Gregory Address*: 201 Coffman St., #1822 Phone Number*: 970-648-0642 FAX Number: 9706480643 E-mail: cspgregory@thegregorylawfirm.net Atty. Reg. #: 37095 *Note Leave blank and see section 6 to keep your address and phone private. This means it will be left off the Court's orders and register of action.	Case Number: _____ Division: _____ Courtroom: _____

I request this Court to issue a Civil Protection Order against the restrained person. In support of this request, I state the following:

1. I am seeking this Civil Protection Order as a victim of the following: (check all that apply)

- ☐ Domestic Abuse (C.R.S. § 13-14-101(2))
- ☐ Domestic Violence (C.R.S. § 13-14-101(2.1))
- ☒ Stalking (C.R.S. §§ 13-14-101(3) and 18-3-602)
- ☐ Sexual Violence (C.R.S. §§ 13-14-101(2.9) and 16-11.7-102(3))
- ☒ Emotional Abuse of the Elderly or an At-Risk Adult (C.R.S. § 26-3.1-101(1) and (7))
- ☒ Physical Assault, Threat, or other situation.

2. Restrained Person

- a) Their name: Michael Dougherty
- b) Their date of birth: (if known) _____
- c) They reside (or are employed) in: (county & state) Boulder, Colorado
- d) How do you know them? 20th Judicial District Attorney's Office

3. The Protected Persons are: (list full name, date of birth, sex, and race)

- a) My Name: Christopher S.P. Gregory
- b) My date of birth: 7/26/1978
- c) My sex and race: Male
- d) I reside (or am employed) in: (county & state) Boulder (Longmont), Colorado
- e) The other protected persons are:

Full Name of Protected Person	Date of Birth	Sex	Race	Full Name of Protected Person	Date of Birth	Sex	Race
Ingrid J. DeFranco	4/29/1955	F					

If any of these people are minor children, complete and attach form JDF 404 – Affidavit Regarding Children

4. a) The most recent incident that causes me to ask for a Civil Protection Order occurred on or about September 10, 2026 (date), at about 4:46 p.m. (time), in Denver / San Diego (CA) (County), when April M. McMurrey (name of person) did the following to me and/or the above named Protected Persons: **Be specific: What was the threat or acts of violence? Where did this occur? Were the minor children or other Protected Persons present? Was a weapon involved?**

Deputy Regulation Counsel April M. McMurrey (via e-mail) sent me the attached letter notifying me that despite being individual capacity defendants in a federal civil action that includes a claim for retaliation brought under the Colorado False Claims Act (the CFCA)--Gregory v. Colo. Jud. Rulemaking Comm., et al., 1:25-cv-03361-KHV-GEB (D. Colo.), the Justices of the Colorado Supreme Court and Attorney General Philip Weiser intended to open a secret investigation of my conduct in having publicly disclosed the admitted judicial misconduct of Adams County Court Judge Leroy Kirby, which included Judge Kirby receiving a "private censure" while I served as Chair of the Colorado Commission on Judicial Discipline. The Colorado Office of Attorney Regulation Counsel (OARC) is part of the Colorado Supreme Court and directly subject to the Justices' supervision and control. When requested to disqualify, OARC and the Justices have refused, while the PDJ has issued a disqualification order. There is a pattern of witness intimidation and retaliation.

- b) The most serious incident that causes me to ask for a Civil Protection Order occurred on or about January 22, 2024 (date), at about 5:03 p.m. (time), in Denver/Boulder/Jefferson (County), when AAG Alison Kyles and AAG Gina Cannan (name of person) did the following to me and/or the above named Protected Persons: **Be specific: What was the threat or acts of violence? Where did this occur? Were the minor children or other Protected Persons present? Was a weapon involved?**

AAG Kyles and AAG Cannan (working at the direction and control of Attorney General Philip Weiser) threatened to seek a search warrant, to bring criminal charges, and/or to bring civil proceedings to coerce my surrendering a copy of my records as Executive Director of the Colorado Commission on Judicial Discipline. Instead of agreeing to deposit the records (which I had a right to keep under Sec. 24-31-1204(8)(a)(I)-(II), (b), C.R.S.) with the FBI or the U.S. District Court, Kyles and Cannan insisted that I surrender the records to the Colorado Attorney General's Office with an affidavit under oath that I had surrendered my only copy. The Justices, Weiser, and the CCJD are now trying to use the affidavit as a means of further retaliation.

- c) Any other past incidents of violence or threats? **Be specific: What was the threat or acts of violence? Where did this occur? Were the minor children or other Protected Persons present? Was a weapon involved?**

There is a long standing pattern, where the Justices of the Colorado Supreme Court, Attorney General Philip Weiser, the members and staff of the Colorado Commission on Judicial Discipline, their subordinates, and other public servants/officials have interfered with my right to freely report criminal and ethical misconduct under the First and Fourteenth Amendments to the U.S. Constitution and Article II, Sections 10 and 25 of the Colorado Constitution. Many of these facts/allegations were made in my federal case, 25-cv-03361, in which a default had entered against all defendants and in which all defendants have avoided / refused to file a responsive pleading. The Justices are concealing grounds for their immediate suspension and removal.

- d) Are you aware of any other Protection Orders currently in effect against you or the other person?

☒ Yes ☐ No If Yes, list any relevant information, such as the issuing Court, State, and date of the order:

The retaliation against me includes Attorney General Weiser and the Justices seeking protective orders against me and my co-Counsel Ingrid J. DeFranco to prevent further disclosures re: Judge Kirby's discipline.

5. I believe that I and/or the other Protected Persons named in this action are in imminent danger from Michael Dougherty (name of person):

☒ Harm to my/our life or health if he/she is not restrained as requested.

☐ Physical or emotional harm to my/our emotional health or welfare if he/she is not excluded from the family home or the home of another.

6. ☒ I request permission to omit my address and phone number from this document, because I fear providing them will endanger me and/or the other Protected Persons.

7. I request the following relief from the Court that Michael Dougherty (name of person):

a) ☒ Be ordered to refrain from contacting, harassing, injuring, stalking, touching, sexually assaulting, molesting, intimidating, and threatening me or other protected persons.

b) ☐ Be ordered to have **no contact** at all with me or the other Protected Persons.

or

☐ Be allowed only the following limited contact with me or the other Protected Persons: **Be specific.**

c) ☐ Be excluded from my home at (address): **If you checked section 6, do not** provide your address.

d) ☐ Be ordered to stay at least _____ yards from the following places. (Address or description.)

Note If you checked section 6 above, **do not** provide your address.

☐ Home: _____

☐ Work: Name: _____ Address: _____

☐ School: Name: _____ Address: _____

☐ Other: _____

e) ☐ Be ordered to have **no contact** with the minor children and that I be awarded temporary care and control and Interim Decision-Making Responsibilities for the children.

or

☐ Be awarded temporary care and control of the children and that the other person be given Parenting Time with the children and Interim Decision-Making Responsibilities as follows: **Be specific.**

f) ☐ Be ordered to refrain from molesting, injuring, taking, transferring, encumbering, concealing, or disposing of or threatening harm to an animal owned, possessed, leased, kept or held by me or my minor child(ren), or other protected persons. Arrangements for possession and care are as follows:

g) ☐ Be ordered, if this is a domestic abuse protection order, to not possess and/or purchase a firearm, ammunition, or other weapon AND to relinquish any firearm or ammunition within the time ordered by the Court.

h) ☒ Be ordered to refrain from interfering with me or other protected persons at our place of employment or place of education and from engaging in conduct that impairs my or other protected person's employment, educational relationships, or environment.

- i) ☒ Other: Be ordered to disqualify and to refrain from further interference with criminal investigations, including the Petitioner's accompanying Sec. 16-5-209, C.R.S. Affidavit to Require Prosecution

Verification

I declare under penalty of perjury under the law of Colorado that the foregoing is true and correct.

I understand that once a Civil Protection Order is issued it cannot be modified or dismissed by me or the other person without permission of the Court.

Executed on the 30th day of September, 2026, at Longmont, Colorado
(date) (month) (year) (city or other location, and state OR country)

Christopher S.P. Gregory
(Printed name of ☒ Petitioner ☐ Respondent)


Signature of ☒ Petitioner ☐ Respondent

Attorney, if applicable

Stop: If you checked box number 6, do not fill in your address and telephone number.

Mailing Address 201 Coffman St., #1822
Longmont, CO 80502

Alternate Mailing Address _____

Phone Number 970-648-0642

Be sure to notify the Court with any address changes for the life of the restraining order.

Notice: Colorado Revised Statutes §13-14-105 identifies that a temporary injunction may be issued by the Court and that upon personal service or upon waiver and acceptance of service by the Restrained Person, is to be in effect against the Restrained Person for a period determined to be appropriate by the Court. This injunction restrains the Restrained Person from:

1. Ceasing to make payments for mortgage or rent, insurance, utilities or related services, transportation, medical care, or childcare when the Restrained Person has a prior existing duty or legal obligation for making such payments.
2. Transferring, encumbering, concealing, or in any way disposing of personal effects or real property, except in the usual course of business or for the necessities of life.

The Restrained Person shall be required to account to the Court for all extraordinary expenditures made after the injunction is in effect.

Any injunction issued shall not exceed one year after the issuance of the Permanent Civil Protection Order.