Boulder County Court--Longmont, State of Colorado 1035 Kimbark St., Longmont, CO 80501	
Petitioner: Christopher S.P. Gregory v. Respondent: Michael Dougherty	DATE FILED October 13, 2026 9:22 PM FILING ID: FC48DFF452254 CASE NUMBER: 2026C30734 ▲COURT USE ONLY▲
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VERIFIED MOTION FOR JUDICIAL DISQUALIFICATION UNDER C.R.C.P. 97 AND FOR FORMATION OF A SPECIAL TRIBUNAL AS MANDATED BY COLO. CONST. ART. VI, § 23(3)(F)(II), (H), C.R.S.; EXHIBIT 1	

Comes now Plaintiff Christopher S.P. Gregory for himself, *in pro per*, and respectfully moves this Court for an order disqualifying 20th Judicial District Court Chief Judge Nancy W. Salomone, District Judge J. Keith Collins, Senior Judge Steven J. Sletta, and all other judges in the 20th Judicial District from hearing this case or any related cases. Plaintiff further requests an order from this Court demanding that the Justices of the Colorado Supreme Court comply with their mandated duty to disqualify the entire Court and form a special tribunal according to Colo. Const. Art. VI, § 23(3)(f)(II). Once formed, the special tribunal can appoint an impartial, conflict-free judge to hear all of Plaintiff's related state court cases, regardless of the

jurisdictions where the cases have been filed. In support of this Motion, Plaintiff states the following, upon information and belief.

INTRODUCTION

Well-documented grounds exist for the immediate suspension of the Justices of the Colorado Supreme Court and Adams County Court Judge Leroy J. Kirby under Colo. RJD 34, pending judicial discipline proceedings that merit the Justices' and Judge Kirby's removal from the bench. Disqualification is self-executing under the Fourteenth Amendment to the U.S. Constitution, Colo. Const. Art. II, § 25, Colo. Const. Art. VI, § 23(3)(f)(II), (h), Colo. RJD 17, Colo. RJD 41, C.R.C.P. 242.37.5, and Canon Rules 1.1 (Compliance with the Law), 1.2 (Promoting Confidence in the Judiciary), 1.3 (Avoiding Abuse of the Prestige of Judicial Office), 2.2 (Impartiality and Fairness), 2.3(C) (Bias, Prejudice, and Harassment), 2.6 (Ensuring the Right to be Heard), 2.9 (Ex Parte Communications), 2.11 (Disqualification),[1] 2.12 (Supervisory

[1] Contrary to Judge Collins's insistence that the law does not obligate him to disclose the nature of conflicts which might require his disqualification, Canon Rule 2.11(C) does in fact impose an affirmative duty. Otherwise, the obligations for disqualification for non-waivable conflicts under Canon Rule 2.11(A)(1) (personal bias or prejudice and/or personal knowledge) are self-executing. Comment 2, Canon Rule 2.11 ("A judge's obligation not to hear or decide matters in which disqualification is required applies regardless of whether a motion to disqualify is filed."). Canon Rule 2.11(C) provides:

> A judge subject to disqualification under this Rule, other than for bias or prejudice under paragraph (A)(1), may disclose on the record the basis of the judge's disqualification and may ask the parties and their lawyers to consider, outside the presence of the judge and court personnel, whether to waive disqualification. If, following the disclosure, the parties and lawyers agree, without participation by the judge or court personnel, that the judge should not be disqualified, the judge may participate in the proceeding. The agreement shall be incorporated into the record of the proceeding.

Comment 5 to Canon Rule 2.11 further clarifies that:

Duties), 2.15 (Responding to Judicial and Lawyer Misconduct), 2.16 (Cooperation with Disciplinary Authorities), and 4.1(A)(11)-(13), (B) (Political and Campaign Activities of Judges) of the Colorado Code of Judicial Conduct (the Code). Despite Plaintiff having brought a federal action—*Gregory v. Colo. Jud. Discipline Rulemaking Comm., et al.*, 1:25-cv-03361-KHV-GEB (D. Colo.) (*Gregory v. CJDRC*), a C.A.R. 21 petition, objections to surreptitious attorney discipline proceedings, the related verified complaints for civil protection orders (Boulder County Court (Longmont) Case Nos. 26C30722 through 26C30767), and a separate action to compel prosecution under § 16-5-209, C.R.S. (*Gregory v. Dougherty*, Boulder Cnty. Ct. (Longmont) Case No. 26C30788), the Justices, assisted by other judges, are obstructing the administration of justice and refusing to form a special tribunal.

The objective of Plaintiff's civil protection order cases is to stop further witness intimidation, retaliation, and tampering. Moreover, Plaintiff has filed his separate action to compel prosecution to address a pattern of willful non-disqualification (by judges, the Colorado Supreme Court's Office of Attorney Regulation Counsel (OARC), and Attorney General Philip Weiser) through misdemeanor prosecutions for, *inter alia*, the crime of First Degree Official Misconduct (§ 18-8-404, C.R.S.). The filing of the civil protection order cases, however, has precipitated the expansion of the conspiracy to conceal the misconduct of the Justices. This conspiracy now includes 20th Judicial District Court Chief Judge Nancy W. Salomone, 20th

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> A judge should disclose on the record information that the judge believes the parties or their lawyers might reasonably consider relevant to a possible motion for disqualification, even if the judge believes there is no basis for disqualification.

Consistent with these obligations under Canon Rule 2.11(A), (C), all the unidentified judges who participated in the case assignment decisions have an obligation to come forward and disclose both their identities and any communications they had regarding the case assignment decisions.

Judicial District Judge J. Keith Collins, Senior Judge Steven J. Sletta, and an unidentified group of other judges within/out the 20th Judicial District who collectively decided to assign Judge Collins to Plaintiff's civil protection order cases despite Judge Collins's known personal prejudice and bias.

Beyond seeking the disqualification of Chief Judge Salomone, Judge Collins, Judge Sletta, and the other involved judges, Plaintiff moves this Court to demand that the Justices disqualify themselves and form a special tribunal, as mandated by Colo. Const. Art. VI, § 23(3)(f)(II). The formation of the mandated special tribunal should occur through a conflict-free process that excludes any involvement of the State Court Administrator's Office (SCAO).[2] Once a special tribunal is formed, the special tribunal should exercise its authority to assign an impartial, conflict-free judge to hear all of Plaintiff's lower court cases.

According to C.R.C.P. 97, this Court, including Judge Collins and Judge Sletta, may not take any further action until this Motion for Judicial Disqualification is ruled upon.

QUESTION PRESENTED

1. Where a chief judge has selectively disqualified the judges of his or her entire judicial district from hearing some cases but does not require disqualification from other cases arising from identical circumstances, whether another judge directly assigned by the chief judge must also disqualify himself or herself.

2. Where grounds for mandatory disqualification under Colo. Const. Art. VI, § 23(3)(f)(II), (h) exist, whether the Colorado Supreme Court has a self-executing duty to immediately disqualify itself and allow for a conflict-free process to form a special tribunal. In turn, whether the special tribunal must exercise the Colorado Supreme Court's authority to appoint a conflict-free judge in related lower court proceedings.

[2] Colo. Const. Art. VI, § 23(3)(f)(II) recognizes the State Court Administrator as responsible for the random selection of the special tribunal's members as a "purely administrative function." Here, however, State Court Administrator Steven Vasconcellos is himself a material witness and interested party. Plaintiff requests that a neutral individual be designated to perform the selection process through a public hearing and disclosure of the pool of qualified potential district and Court of Appeals judges from whom the members will be chosen.

3. Through the facts stated in this Verified Motion, whether personal bias or prejudice mandates that 20th Judicial District Chief Judge Nancy W. Salomone, District Judge J. Keith Collins, Senior Judge Steven J. Sletta, and other judges who involved themselves in the direct assignment of Plaintiff's cases to Judge Collins and Judge Sletta automatically disqualify themselves.

BACKGROUND

Plaintiff served as a member, Vice Chair, Chair, and Executive Director of the Colorado Commission on Judicial Discipline (the CCJD). In those roles, Plaintiff sought accountability for the Justices of the Colorado Supreme Court perpetuating a more than 25-year ongoing pattern of misusing public resources to cover up serious judicial, attorney, and official misconduct. The most significant example of this deliberately concealed misconduct is the Justices' collective approval of a $2.66-$2.75 million *quid pro quo* hush money contract with then-Colorado State Court Administrator's Office Chief of Staff Mindy Masias. Another significant example is the Justices' efforts to conceal or minimize Adams County Court Judge and then-CCJD Chair Leroy Kirby having engaged in an inappropriate / unreported extra-marital relationship with court staff that included sex in the courthouse followed by a continuing pattern of persistent dishonesty. The Justices have consistently and repeatedly retaliated against Plaintiff and those around him for his having reported this ongoing pattern of misconduct publicly and through court filings.

The September 15, 2026 disciplinary retirement of New Hampshire Supreme Court Chief Justice Gordon J. MacDonald based upon a highly-similar fact pattern confirms that there are sufficient grounds for the suspension and removal of the Justices of the Colorado Supreme Court. *Compare Matter of MacDonald*, JD-2026-0004 (N.H.) *and Matter of Coats*, 2023 CO 44. Likewise, impeachment resolutions pending against U.S. District Court Judge for the Northern District of Georgia Eleanor L. Ross for substantially-similar misconduct to that committed by Judge Leroy Kirby supports Judge Kirby's immediate suspension and ultimate removal.

Compare Colo. Comm. on Jud. Discipline, 2019 ANNUAL REPORT, p. 13 (partially describing Judge Kirby's misconduct without addressing his persistent dishonesty) *and* H.R. 1346, 119th Cong. (2026) and H.R. 1351, 119th Cong. (2026) (resolutions describing articles of impeachment against Judge Ross).

The primary means for the retaliation that Plaintiff has experienced and continues to experience is the willful non-disqualification of law enforcement, regulators, and judges so that, regardless of the truth of Plaintiff's reporting, the Justices' misconduct and the misconduct of others is methodically obfuscated and hidden from the electorate and general public. This willful and intentional non-disqualification is not only unethical, but also a crime—First Degree Official Misconduct (§ 18-8-404, C.R.S.).[3]

Each of the judges responsible for Judge Collins's selective assignment to these cases and for enabling Judge Collins and Senior Judge Steven J. Sletta to continue the pattern of granting Attorney General Philip Weiser's frivolous requests for the imposition of prior restraints on Plaintiff's mandated reporting of judicial, attorney, and official misconduct should themselves be investigated and charged with First Degree Official Misconduct. *See Gregory v. Dougherty*, Case No. 26C30788. Senior Judge Sletta's conduct in issuing orders imposing prior restraints,

[3] As relevant to intentional non-disqualification, First Degree Official Misconduct is proven through the following elements:

a. The Defendant,
b. In the State of Colorado, at or about the date and place charged,
c. Was a public servant, and
d. With intent,
e. To obtain a benefit for himself/herself **or** another **or** maliciously to cause harm to another, he/she,
f. Knowingly,
g. Refrained from performing a duty imposed upon him/her by law (i.e. disqualification and disclosure of conflicts).

only after Plaintiff had filed notices of appeal in the four cases heard by Judge Sletta, is particularly egregious. *Gregory v. Berkenkotter*, Case No. 26C30724, *Gregory v. Blanco*, Case No. 26C30725, *Gregory v. Dougherty*, Case No. 26C30734, and *Gregory v. Kupfner*, Case No. 26C30743. Senior Judge Sletta's delayed decision to grant Attorney General Weiser's "Motion to Intervene for Limited Purpose of Raising Confidentiality of Commission Information Filed by Petitioner" and accompanying "Emergency Motion to (1) Seal Petitioner's Verified Complaint for Civil Protection Order, Supplement Thereto, and Declaration of Christopher S.P. Gregory, and (2) Require Petitioner to File Any Papers that Contain Discussion of Judicial Discipline Regarding Colorado Judges as Suppressed in the First Instance" appears to have occurred in direct retaliation for Plaintiff having filed his "Forthwith Motion for Ruling on Motion to Require Notice and Disclosure of Circumstances Related to Case Assignment." Judge Sletta has further retaliated against, obstructed the administration of justice, and overtly denied Plaintiff a full and fair opportunity to be heard by imposing $250 appeal bonds in each of the cases in which Plaintiff has filed appeals (Case Nos. 26C30724, 26C30725, 26C30734, and 26C30743). The purpose of the appeal bond is to ensure that the judicial district receives payment for its costs in preparing the record on appeal, but here, there is virtually no record, the record is already in electronic form, and the district incurs no costs. Judge Sletta's conduct violates Canon Rules 1.1, 1.2, 2.3(C), 2.6, 2.15, and 2.16 and is directly in response to Plaintiff's request for waiver of fees and costs on the appeals, made through Plaintiff's Forthwith Motion for Ruling. By granting Attorney General Weiser's motions, Judge Sletta has endorsed, enabled, and joined the very retaliation that Plaintiff has sought to stop through his civil protection order cases. *See also Wright v. Dist. Court In & For Gunnison Cnty.*, 731 P.2d 661, 664-665 (Colo. 1987) (recognizing inappropriateness of judge pursuing disciplinary grievance against attorney

continuing to hear a related case). This pattern of judicially sanctioned censorship, intimidation, retaliation, and witness tampering is the core basis for Plaintiff's underlying verified complaints for civil protection orders.

ANALYSIS

1. 20th Judicial District Chief Judge Nancy W. Salomone issued a "Bench Recusal Order" disqualifying the judges of the 20th Judicial District from hearing some but not all of Plaintiff's verified complaints for civil protection orders, each of which share an identical factual basis. Chief Judge Salomone, District Judge J. Keith Collins, and Senior Judge Steven J. Sletta, whom Chief Judge Salomone selectively assigned and apportioned Plaintiff's cases between are disqualified as a matter of law.

   C.R.C.P. 97 (Change of Judge) provides:

   > A judge shall be disqualified in an action in which he is interested or prejudiced, or has been of counsel for any party, or is or has been a material witness, or is so related or connected with any party or his attorney as to render it improper for him to sit on the trial, appeal, or other proceeding therein. A judge may disqualify himself on his own motion for any of said reasons, or any party may move for such disqualification and a motion by a party for disqualification shall be supported by affidavit.[4] ***Upon the filing by a party of such a motion all other proceedings in the case shall be suspended until a ruling is made thereon. Upon disqualifying himself, a judge shall notify forthwith the chief judge of the district who shall assign another judge in the district to hear the action. If no other judge in the district is available or qualified, the chief judge shall notify forthwith the court administrator who shall obtain from the Chief Justice the assignment of a replacement judge.*** (Emphasis added).

[4] As allowed by C.R.C.P. 108, Plaintiff combines the required affidavit with this verified motion. The test under C.R.C.P. 97 is whether the motion and supporting affidavit alleges sufficient facts from which it may be reasonably inferred that the judge is prejudiced or biased, or appears prejudiced or biased against a party to the litigation. Once facts have been set forth that create a reasonable inference of a bent of mind which would prevent the judge from dealing fairly with the party seeking recusal, it is incumbent upon the judge to recuse. When considering the sufficiency of a motion for disqualification, the judge reviewing the motion must accept the movant's factual statements in the motion and affidavit as true and determine as a matter of law whether such facts are legally sufficient to require disqualification. *Bocian v. Owners Ins. Co.*, 2020 COA 98, ¶ 15. Even if the judge believes the movant's statements to be false or erroneous, the judge must accept the facts as true and confine his or her analysis to the four corners of the motion and supporting affidavit. *Brewster v. Dist. Ct.*, 811 P.2d 812, 813-14 (Colo. 1991).

As highlighted, C.R.C.P. 97 applies whenever a judge disqualifies himself or herself either *sua sponte* or on a motion submitted by one or more of the parties. C.R.C.P. 97 requires notice to the chief judge, who reassigns the case unless he or she is also disqualified. When the chief judge is disqualified, the reassignment of the case is referred to the Chief Justice.

C.R.C.P. 97 does not contemplate the circumstances involved here, namely that the regularly assigned judge, Boulder County Court Judge Elizabeth Brodsky, did not formally disqualify herself from hearing Plaintiff's cases, that Chief Judge Salomone has exercised her administrative authority to disqualify the entire 20th Judicial District bench from some but not all of Plaintiff's cases, and that, despite acknowledging her own conflicts, Judge Salomone proceeded to directly assign 20th Judicial District Judge J. Keith Collins and Senior Judge Steven J. Sletta to hear Plaintiff's cases. Additionally, C.R.C.P. 97 does not contemplate Chief Justice Monica Márquez having conflicts that prevent her from appointing a judge to hear Plaintiff's cases when Chief Judge Salomone is also conflicted from doing so. C.R.C.P. 97 does not address circumstances where both the chief judge and the chief justice are disqualified. Colo. Const. Art. VI, § 23(3)(f)(II), however, prescribes the proper procedure when the Colorado Supreme Court must disqualify itself. The proper procedure is to form a special tribunal and to have that special tribunal exercise the authority of the Chief Justice to appoint an impartial judge to hear lower court proceedings involving the potential discipline of the Justices of the Colorado Supreme Court.

By issuing her October 1, 2026 "Bench Recusal Order," Chief Judge Salomone confirmed that neither she nor any other 20th Judicial District judge can impartially hear the issues raised in Plaintiff's cases. Chief Judge Salomone refused to disclose the specific nature of the conflicts requiring disqualification of the entire 20th Judicial District bench. Rather, Judge

Salomone stated: "The judicial officers of the 20th Judicial District hereby recuse from this matter." Because these cases all arise through identical circumstances, Chief Judge Salomone abused her discretion by directly reassigning Plaintiff's cases to Judge Collins and Judge Sletta. *Aaberg v. Dist. Court of Seventh Judicial Dist. In & For Gunnison Cnty.*, 319 P.2d 491, 493 (Colo. 1957) ("When a judge is charged with bias and prejudice and sustains a motion so charging, or steps aside without ruling on the motion, proper procedure requires that he not select his successor or assign the case to another judge, but that he proceed in accordance with Rule 97[.]"); *see also In re Marriage of Fifield*, 776 P.2d 1167, 1168 (Colo. App. 1989). These case assignments were made despite awareness that Judge Collins was himself a material witness to the judicial, attorney, and official misconduct that Plaintiff has alleged in the related cases. Moreover, after being appointed to hear Plaintiff's cases, Judge Collins proceeded to specifically recuse himself from an additional two cases: *Gregory v. Berkenkotter*, Case No. 23C30724 and *Gregory v. Blanco*, Case No. 23C30725. Judge Collins refused to explain the grounds for his recusal. Instead, Judge Collins simply stated, "I recuse." *Contra Beckord v. Dist. Court of Larimer Cnty. in Eighth Judicial Dist.,* 698 P.2d 1323, 1329 (Colo. 1985) (citing *State ex rel. Stefonick v. District Court*, 157 P.2d 96 (Mont. 1945) ("[J]udges cannot be disqualified from portions of an action so as to parcel out the jurisdiction concurrently among two or more judges[.]").

Chief Judge Salomone violated well-settled precedent that, once disqualified due to potential bias or prejudice, a judge may not choose his or her successor. These circumstances were aggravated by Chief Judge Salomone's apparent consultation with other unidentified 20th Judicial District judges (and possibly judges from outside the 20th Judicial District) in the course of making her reassignment decisions. Chief Judge Salomone further violated well-settled

precedent by parceling out the hearing of Plaintiff's cases to two judges (rather than to a single impartial judge assigned through a conflict-free mechanism). Because neither Chief Judge Salomone nor Chief Justice Márquez is qualified to reassign Plaintiff's cases, the constitutionally-mandated solution is for the Colorado Supreme Court to disqualify itself and allow for the formation of a special tribunal according to Colo. Const. Art. VI, § 23(3)(f)(II). Once the special tribunal is formed, it may select a similarly impartial judge to hear Plaintiff's cases and related cases. The Justices, Chief Judge Salomone, Judge Collins, Judge Seltta, Denver District Court Judge A. Bruce Jones, and all other judges who have interfered with the assignment of Plaintiff's cases and related cases must recuse themselves and allow for the formation of a special tribunal.

2. The Justices of the Colorado Supreme Court are the subjects of Plaintiff's complaints and well-documented allegations of judicial misconduct. The Justices, their staff, and some of their family members are further material witnesses with personal interests in the outcome of Plaintiff's various civil actions. There are multiple grounds under Colo. Const. Art. VI, § 23(3)(f)(II), (h) which mandate the Justices' immediate disqualification and the formation of a special tribunal through a conflict-free and publicly transparent selection process. Once formed, the special tribunal will have authority to assign an impartial judge to hear Plaintiff's lower court cases, regardless of the jurisdictions in which the cases have been filed.

Colo. Const. Art. VI, § 23(3)(f)(II) provides a mechanism for composing a substitute decision-making body when the Colorado Supreme Court is conflicted and must be entirely disqualified due to one or more of five circumstances:

> (A) When the proceedings involve a complaint against a Colorado supreme court justice;
>
> (B) When a Colorado supreme court justice is a complainant or a material witness in the proceeding;
>
> (C) When a staff member to a Colorado supreme court justice is a complainant or material witness in the proceeding;
>
> (D) When a family member of a Colorado supreme court justice is a complainant or material witness in the proceeding; or

> (E) When any other circumstances exist due to which more than two Colorado supreme court justices have recused themselves from the proceeding.

These triggering circumstances conform to circumstances which the Colorado Supreme Court has itself previously recognized (prior to ratification of Amendment H by a 73% majority of Colorado voters in 2024) as grounds for disqualification in judicial and attorney discipline proceedings. Colo. RJD 41 and C.R.C.P. 242.37.5. The most significant difference between the triggering conditions recognized by court rule and those recognized through Colo. Const. Art. VI, § 23(3)(f)(II) is that the court rules further require disqualification in the first two circumstances when a former justice is the subject of a complaint or a material witness in the proceeding. Colo. Const. Art. VI, § 23(3)(f)(II) reinforces the pre-existing mandate in Colo. Const. Art. VI, § 23(3)(h), which prohibits a justice or judge from hearing cases involving his or her own discipline. Colo. Const. Art. VI, § 23(3)(h) provides: "A justice or judge who is a member of the commission, adjudicative board, tribunal, or supreme court shall not participate in any proceedings involving the justice's or judge's own removal or retirement." Importantly, the prohibition against participating in "proceedings" is not limited to judicial discipline proceedings but instead extends to any "proceedings involving the justice's or judges' own removal or retirement." The plain meaning of this prohibition should be interpreted to prohibit participating in civil or criminal proceedings that involve grounds for a judge or justice's potential discipline with the possibility of removal or retirement.

Here, triggers for the mandatory formation of a special tribunal under Colo. Const. Art. VI, § 23(3)(f)(II) are met in various ways: the proceedings involve complaints against each of the Justices as well as against former justices who have assisted or continue to assist the current Justices in covering up misconduct that supports their removal; both the current Justices and former justices are material witnesses in these proceedings; current staff members, particularly

former Counsel to the Chief Justice and now SCAO Judicial Counsel Andrew Rottman are material witnesses in these proceedings; family members of one or more justices are also material witnesses in these proceedings. If the standards for disqualification under Canon Rule 2.11(A) and C.R.C.P. 97 are applied, circumstances requiring the disqualification of all the Justices are also present, satisfying the fifth trigger for formation of a special tribunal.

Although Plaintiff has sought the recusal of the entire Colorado Supreme Court and the formation of a special tribunal under Colo. Const. Art. VI, § 23(3)(f)(II) in related proceedings, the Justices have persistently refused to disqualify themselves. *Gregory v. Colo. Jud. Discipline Rulemaking Comm., et al.*, 1:25-cv-03361-KHV-GEB (D. Colo.); *In re Gregory v. Colo. Off. Jud. Perform. Eval., et al.*, Colo. Sup. Ct. Case No. No. 26SA268. This persistent non-disqualification has happened despite the Justices having previously disqualified the Court and allowed for the formation of a special tribunal upon the same factual basis. *Matter of Coats*.

Once formed with district court judges and no more than one Court of Appeals judge, a special tribunal will have the authority to assign an impartial judge to hear all of Plaintiff's cases and related cases, regardless of the jurisdictions in which the cases have been filed. Until the mandated formation of a special tribunal occurs, however, Plaintiff will continue to be deprived of due process, including his fundamental right to be heard before an impartial judge.

3. Chief Judge Salomone, District Court Judge Collins, Senior Judge Sletta, and all the unidentified judges who participated in the assignment of Plaintiff's cases objectively created circumstances where the "probability of actual bias on the part of the judge or decisionmaker is too high to be constitutionally tolerable" and which categorically mandate the judges' automatic recusal.

Chief Judge Salomone assigned Plaintiff's cases to District Court Judge Collins and Senior Judge Sletta after she decided, entirely without explanation, that the entire 20th Judicial District bench was selectively disqualified from hearing some of Plaintiff's cases, even though

each of the cases arise from an identical factual basis. As discussed *supra*, Chief Judge Salomone violated well-settled precedent by making these case assignments. *See Aaberg*; *Beckord*. Judge Collins, likewise, violated the principle established in *Beckord*, by selectively disqualifying himself from some of the cases while hearing the others. Judge Salomone and the other unidentified judges who participated in making the case assignments should have been aware of Judge Collins's status as a material witness to Plaintiff's underlying allegations of judicial misconduct.

As Plaintiff explained during the temporary civil protection orders hearing before Judge Collins, objective evidence of the "probability of actual bias" on Judge Collins's part that is "too high to be constitutionally tolerable" includes:

a) Judge Collins's having been law partners with a material witness, former Colorado Legal Regulation Committee Chair Steven K. Jacobson,[5] prior to ascending the bench,

b) Judge Collins and Plaintiff having been part of the same cohort of child welfare attorneys prior to Judge Collins becoming a magistrate and Plaintiff becoming Executive Director of the CCJD, and

c) Judge Collins being a member of the Colorado Judicial Ethics Advisory Board (the CJEAB) when it issued an ultra vires non-advisory opinion involving then-Dolores County Court Judge Matthew Margeson (who was simultaneously represented by CJEAB Chair Alec Rothrock's law firm Burns Figa & Will, PC in disciplinary proceedings before the CCJD). Copies of Plaintiff's request for evaluation (RFE) of judicial conduct filed with the CCJD against now 7th Judicial District Court Judge Matthew Margeson and the CCJD's summary dismissal letter are attached as Exhibit 1. In addition to enabling Judge Margeson's violations of the Code, Alec Rothrock, his law partner John Gleason, and Burns Figa & Will represented former Chief Justice Nathan B. Coats in his disciplinary cases before the CCJD and the Legal Regulation Committee.

[5] The Legal Regulation Committee oversaw the parallel OARC investigation of former Chief Justice Nathan B. Coats and made the decision to keep the final report produced by outside special counsel "confidential."

When Plaintiff raised objections to Judge Collins hearing any of Plaintiff's civil protection order cases, those objections were ignored. Plaintiff has requested transcripts of the hearings before Judge Collins and Judge Sletta in anticipation of appeal.

To be clear, Judge Collins is subject to mandatory disqualification from Plaintiff's cases under at least six independently sufficient legal grounds:

a) Judge Collins is a material witness under C.R.C.P. 97 and Canon Rule 2.11(A)(5)(c) because of his personal participation on the CJEAB when it issued its non-advisory opinion (CJEAB Op. No. 2023-01) interfering with the CCJD's investigation of then-Dolores County Court Judge Matthew G. Margeson. CJEAB Op. No. 2023-01 was used to preemptively exonerate Judge Margeson while the CJEAB's Chair Alec Rothrock's law firm Burns Figa & Will represented Judge Margeson in his judicial discipline proceedings before the CCJD. Judge Collins is also a material witness to and has personal knowledge of Alec Rothrock's conflicted service on the CJEAB when Rothrock and his firm concurrently represented former Chief Justice Coats in attorney and judicial discipline proceedings. The Justices are also personally aware of the misconduct involved in the CJEAB interfering with Judge Margeson's discipline through CJEAB Op. No. 2023-01, which the Justices helped facilitate through supervision of their former staff attorney and now Court of Appeals Judge Melissa Meirink.

b) Judge Collins has personal knowledge of disputed evidentiary facts material to Plaintiff's civil protection order cases and declaration to compel prosecution. Judge Collins was required to recuse himself *sua sponte* under Canon Rule 2.11(A)(1).

c) Judge Collins's written orders and the orders subsequently granted by Judge Sletta constitutes direct evidence of actual bias and the retaliatory use of judicial proceedings to obstruct the reporting of judicial misconduct, in violation of Canon Rules 1.1, 1.2, 1.3, 2.3(C), 2.11, 2.15, and 2.16. Both Judge Collins and Judge Sletta must disqualify themselves from further hearing of Plaintiff's cases.

d) By allowing Attorney General Philip Weiser to intervene in Plaintiff's civil protection order cases despite Attorney General Weiser's being an individual capacity defendant (with the Justices and the members / staff of the CCJD) in *Gregory v. CJDRC*, Judge Collins and Judge Sletta are only perpetuating the witness / victim intimidation, retaliation, and tampering that Plaintiff seeks to stop by obtaining civil protection orders. Judge Collins and Judge Sletta's overt misconduct and coercion is another disqualifying conflict under C.R.C.P. 97 and Canon Rule 2.11(A).

e) Judge Collins's selective recusal from the *Berkenkotter* and *Blanco* cases while refusing to recuse from Plaintiff's other identically pled civil protection order cases violates the principle established in *Beckord* that a judge who recuses from part of related litigation is effectively disqualified from all of it.

f) Judge Collins's withholding of material information relevant to his disqualification obligations combined with the grounds for mandatory disqualification described in this Verified Motion deprives Plaintiff of due process and constitutes structural error under both the Fourteenth Amendment to the U.S. Constitution and Colo. Const. Art. II, § 25. *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009); *Williams v. Pennsylvania*, 579 U.S. 1 (2016); *Sanders v. People*, 2024 CO 33. Due process mandates recusal because "objectively speaking, 'the probability of actual bias on the part of the judge or decisionmaker is too high to be constitutionally tolerable.'" *Sanders* at ¶ 29 (quoting *Rippo v. Baker*, 580 U.S. 285, 287 (2017)).

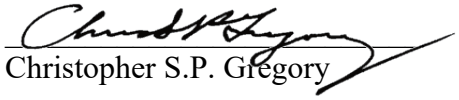
CONCLUSION

The circumstances through which Plaintiff seeks the formation of a special tribunal under Colo. Const. Art. VI, § 23(3)(f)(II) are not abstract nor are the circumstances that require disqualification of Chief Judge Nancy W. Salomone, District Judge J. Keith Collins, Senior Judge Steven J. Sletta, and all unidentified judges who collaborated on the conflicted assignment of Plaintiff's cases. Plaintiff respectfully requests orders disqualifying the involved judges from further hearing of this case and Plaintiff's related cases and staying case reassignment until a special tribunal can be formed according to Colo. Const. Art. VI, § 23(3)(f)(II).

Verification

I declare under penalty of perjury under the laws of the State of Colorado that the foregoing statements made in this Verified Motion for Judicial Disqualification Under C.R.C.P. 97 and for Formation of a Special Tribunal as Mandated by Colo. Const. Art. VI, § 23 are true and correct to the best of my knowledge.

Executed on the 13th day of October, 2026, at Longmont, Colorado.



Christopher S.P. Gregory

Respectfully submitted,

/s/ Christopher S.P. Gregory
Christopher S.P. Gregory, Reg. # 37095
Attorney *Pro Per* for Petitioner

CERTIFICATE OF SERVICE

I certify that, on October 13, 2026, I have sent a true and complete copy of the foregoing Verified Motion for Judicial Disqualification Under C.R.C.P. 97 and for Formation of a Special Tribunal as Mandated by Colo. Const. Art. VI, § 23(3)(f)(II), (h), C.R.S.; Exhibit 1 via E-Mail (or through means otherwise specified below) to:

Philip J. Weiser, Attorney General
Charles Kooyman, Senior AAG
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