SUPREME COURT, STATE OF COLORADO TWO EAST 14<sup>TH</sup> AVENUE DENVER, COLORADO 80203

CASE NO. 04SA98

ORIGINAL PROCEEDING IN UNAUTHORIZED PRACTICE OF LAW, 03UPL040

## Petitioner:

THE PEOPLE OF THE STATE OF COLORADO,

v.

## Respondent:

GLORIA COX-ROMO

## ORDER OF INJUNCTION

Upon consideration of the Petition for Injunction, the Proof of Service and the Motion to Proceed, and being sufficiently advised in the premises,

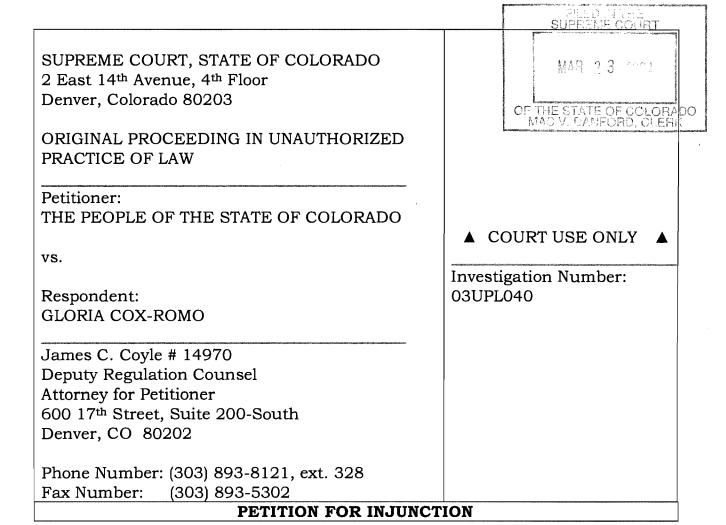
IT IS ORDERED that GLORIA COX-ROMO is ENJOINED from the unauthorized practice of law.

IT IS FURTHER ORDERED that the Respondent is assessed costs in this matter in the amount of \$186.20 which shall be paid within thirty (30) days.

BY THE COURT, JUNE 18, 2004.

Copies mailed via the State's Mail Services Division on OO HOP HOP

James Coyle Deputy Regulation Counsel Gloria Cox-Romo 1371 S. Dayton Court Denver, CO 80247



Petitioner, by and through James C. Coyle, Deputy Regulation Counsel, respectfully requests that the Colorado Supreme Court issue an order pursuant to C.R.C.P. 234 directing the respondent to show cause why he should not be enjoined from the unauthorized practice of law. As grounds therefor, counsel states as follows:

- 1. The respondent, Gloria Cox-Romo, is not licensed to practice law in the state of Colorado. The respondent's last known address is 1371 South Dayton Court, Denver, Colorado 80247.
- 2. The respondent is married to Raymond E. Romo. Mr. Romo had been charged with theft from a Jared Jewelers store. Mr. Romo was eventually acquitted of such charges.
- 3. Mr. Romo decided to sue Jared Jewelers. The respondent has stated that Romo asked her to represent his interests in such a lawsuit.

- 4. The respondent is not a licensed attorney in the State of Colorado or any other state and is not a graduate of any law school.
- 5. The respondent has admitted that she prepared the complaint. She has stated that she based the complaint on samples received from the Adams County District Court Clerk's Office. A copy of the complaint drafted and filed by the respondent is attached as Exhibit 1.
- 6. In the "attorney or party without attorney" caption section, the respondent provided her name as "representative for Raymond E. Romo." The respondent also provided her address, phone number, fax number, and the e-mail "gloriacoxromo@aol.com."
- 7. In the introductory paragraph, the respondent stated "Comes now, the Plaintiff, Raymond E. Romo by and with his representative, Gloria Cox-Romo for his complaint ...." The respondent signed the complaint on behalf of Raymond E. Romo as "representative for plaintiff."
- 8. The respondent also prepared a summons for the complaint. A copy of the summons is attached as Exhibit 2. Again, the respondent provided her name in the caption as well as signed the summons as "representative" for the plaintiff.
  - 9. The summons and complaint were served upon Jared Jewelers.
- 10. When the Adams County District Court was notified that a complaint had been filed by a non-attorney representative, the court struck the complaint and dismissed the matter.
- 11. Raymond E. Romo and the respondent then hired attorney William Morris to represent Mr. Romo's interests. Attorney Morris filed a complaint in Denver District Court and represented the plaintiff's interests thereafter. The matter settled in January 2004.
- 12. The respondent took no further action on behalf of Mr. Romo after the complaint was stricken by the Adams County District Court.
- 13. By holding herself out as the legal representative for Raymond E. Romo in an Adams County District Court matter, by preparing the district court complaint and summons on behalf of Mr. Romo and by attempting to represent Mr. Romo's legal interests in a district court lawsuit against Jared Jewelers, the respondent engaged in the unauthorized practice of law (the unauthorized practice of law includes acting as a representative in protecting,

enforcing or defending the legal rights and duties of another and/or counseling advising and assisting that person in connection with legal rights and duties. See Denver Bar Association v. P.U.C., 154 Colo. 273, 391 P.2d 467 (1964)). The respondent does not fall within any of the statutory or case law exceptions.

WHEREFORE, the petitioner prays that this court issue an order directing the respondent to show cause why the respondent should not be enjoined from engaging in any unauthorized practice of law; thereafter that the court enjoin this respondent from the practice of law, or in the alternative that this court refer this matter to a hearing master for determination of facts and recommendations to the court on whether this respondent should be enjoined from the unauthorized practice of law. Furthermore, petitioner requests that the court assess the costs and expenses of these proceedings, including reasonable attorney fees against this respondent; and assess restitution against the respondent for losses incurred by third parties as a result of the respondent's conduct; and any other relief deemed appropriate by this court.

Respectfully submitted this 22nd of March, 2004.

JAMES C. COYLE, #14970 Deputy Regulation Counsel Attorney for Petitioner





DISTRICT COURT, COUNTY OF ADAMS COLORADO

Court Address: 1100 Judicial Center Drive

Brighton, Colorado 80601

Phone Number: (303) 659-1161

Plaintiff(s): RAYMOND E. ROMO

V.

Defendant(s): JARED JEWELERS

Westminster City Center, 9210 Sheriden Blvd.

Westminster, CO 80031

Attorney or Party Without Attorney (Name and Address):

Gloria Cox-Romo, Representative for Raymond E. Romo

1371 S. Dayton Court Denver, CO 80247

Phone Number: (303) 618-9562 Fax: 303-488-9705 (call first) E-mail: gloriacoxromo@aol.com Case Number:

CV1286

Division

Courtroom

FILED IN ADAMS COUNTY COMBINED COURT

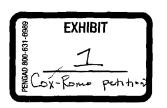
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**COURT USE ONLY** 

COMPLAINT

COMES NOW, the Plantiff, Raymond E. Romo by and with his representative, Gloria Cox-Romo for his complaint against the Defendant, Jared Jewelers, states and alleges as follows:

- 1. On or about July 30, 2001, the Plantiff, Raymond E. Romo was shopping for a graduation gift for his son, Raymond E. R. Romo in the Defendant, Jared Jeweler's store. The Plantiff, Raymond E. Romo was arrested after comparing two identical rings. One ring was the property of the Plantiff, Raymond E. Romo and the other, the property of the Defendant, Jared Jeweler.
- 2. While the Plantiff, Raymond E. Romo explained to the salesman, that the tag had fallen off of the store's ring, the Defendant, Jared Jeweler's sales person snatched both rings from the hand of the Plantiff, Raymond E. Romo and accused him of trying to switch a fake ring with a ring belonging to the Defendant, Jared Jeweler.
- 3. Raymond E. Romo repeatedly advised the salesman that his ring was not a fake and that he had recently gotten his ring sized and appraised at the same Jared store that would reveal the true value of his ring. The salesman refused to hear the Plantiff and immediately summoned the security guard on duty and instructed him to call the police.
- 4. The policeman arrived at the store within approximately thirty minutes and Jared Jewelers instructed the police officer to arrest the Plantiff, Raymond E. Romo for theft. The police officer, following the orders of Jared Jewelers, handcuffed the Plantiff, Raymond E. Romo, read him his rights, and arrested him.



- 5. At the same place and time that the Plantiff, Raymond E. Romo was shopping, and then arrested in the Defendant, Jared Jeweler's store, a 24-hour surveillance camera was in operation.
- 6. During the trial of a twelve-member jury for this case, the DA advised the jury that the videotape of the incident had been erased for the period the Plantiff, Raymond E. Romo was in the store.
- 7. After a five-minute deliberation of the jury, the Plantiff, Raymond E. Romo was found not guilty. Prior to the deliberation, the Judge asked the DA if he wanted to dismiss the case, but the DA decided to continue.
- 8. The above-described incident was the sole result of the Defendant, Jared Jeweler 's negligence and discrimination against the Plantiff, Raymond E. Romo from the moment he walked into the Defendant, Jared Jeweler's store.
- As a direct and proximate result of the negligence of Jared Jeweler, heretofore alleged, Plantiff, Raymond E. Romo, has sustained mental anguish, pain and suffering, permanent emotional scars, loss of wages, torment and distress, and public humiliation.

WHEREFORE, Plantiff, Raymond E. Romo prays that judgment be entered in favor against the Defendant, Jared Jeweler, in the amount of \$500,000 to be decided at trial, plus costs, interest from the date of the arrest, and for such other and further relief as the court deems just and proper.

Respectfully submitted this 5th day of May, 2003.

Bv:

Gloria Cox-Romo, Representative for Plantiff

1371 S. Dayton Court Denver, CO 80247 Business: 720-554-1221

Home Phone: (303) 283-0490 Cell Phone: (303) 618-9562

Plantiff's Address 1371 S. Dayton Court Denver, CO 80247

cc: Fireman's Fund

Jared-Galleria of Jewelry #0483

District Court, <u>Odams</u> County, Colorado	
Court address: 100 Judicial Center Drive	FILED IN ADAMS COUNTY COMBINED COURT
Brughton, CO 80601	MAY 0 5 2003
Plaintiff(s): Paymond E Romo	
v. 0. 1.1. 1. 1.1.02	
Defendant(s): Gared Glweler # 0483 Westminater City Center 9210 Sheriden Blud. Westminater, CO 80031	
Attorney or Party Without Attorney (Name and Address):	-
Gloria Cox-Romo, Representation for Plantiff	
1371 S. Dayton Court	▲ COURT USE ONLY ▲
	Case Number:
Plnuer, CO 80247	Case Ivamber.
Phone Number (303) 618-9562 E-mail: glora cox romo Q	
FAX Number: (303) 420-9705 Atty. Reg. #:	Division: O Goundoch:
SUMMONS	A A A A T T C

The People of the State of Colorado, To the Defendant(s) named above:

You are hereby summoned and required to file with the clerk of this court an answer or other response to the attached complaint. If service of the summons and complaint was made upon you within the State of Colorado, you are required to file your answer or other response within 20 days after such service upon you. If service of the summons and complaint was made upon you outside of the State of Colorado, you are required to file your answer or other response within 30 days after such service upon you.

If you fail to file your answer or other response to the complaint in writing within the applicable time period, judgment by default may be entered against you by the court for the relief demanded in the complaint, without any further notice.

The following documents are also served with this summons:

Date: May 5, 2003

Attorney for Plaintiff or Clerk Deputy Clerk of Court

This summons is issued pursuant to Rule 4, C.R.C.P., as amended. A copy of the complaint must be served with this summons.

EXHIBIT

E Cx-Romo petition