

SUPREME COURT, STATE OF COLORADO
TWO EAST 14TH AVENUE
DENVER, COLORADO 80203

CASE NO. 03SA284

ORIGINAL PROCEEDING IN UNAUTHORIZED PRACTICE OF
LAW 02UPL065

Petitioner:

THE PEOPLE OF THE STATE OF COLORADO,
v.

Respondent:

JEROME A. MOORE

RECEIVED

DEC 29 2003

**ATTORNEY
REGULATION**

ORDER OF COURT

Upon consideration of the Petition for Injunction, the Order to Show Cause, the Response to Order to Show Cause, and the Reply on Order to Show Cause filed in the above cause, and now being sufficiently advised in the premises,

IT IS THIS DAY ORDERED that the Respondent, JEROME A. MOORE, is ENJOINED from engaging in further acts of unauthorized practice of law,

IT IS FURTHER ORDERED that the Respondent is assessed costs in the amount of \$121.45. Said costs to be Remitted to the Office of the Attorney Regulation Counsel within thirty days of the date of this order.

BY THE COURT, DECEMBER 22, 2003.

Copies mailed via the State's Mail Services Division on 12/22/03 HOP



James Coyle
Deputy Regulation Counsel

Jerome Moore
1955 Arapahoe St., #1204
Denver, CO 80202

FILED IN THE
SUPREME COURT
OCT 30 2002
CLERK OF COURT
DENVER, CO

SUPREME COURT, STATE OF COLORADO
2 East 14th Avenue, 4th Floor
Denver, Colorado 80203

ORIGINAL PROCEEDING IN UNAUTHORIZED
PRACTICE OF LAW

Petitioner:
THE PEOPLE OF THE STATE OF COLORADO

vs.

Respondent:
JEROME A. MOORE

James C. Coyle # 14970
Deputy Regulation Counsel
Attorney for Petitioner
600 17th Street, Suite 200-South
Denver, CO 80202

Phone Number: (303) 893-8121, ext. 328
Fax Number: (303) 893-5302

▲ COURT USE ONLY ▲

Case Number: 02UPL065

PETITION FOR INJUNCTION

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, Jerome A. Moore, is not licensed to practice law in the state of Colorado. The respondent's last known address is 1955 Arapahoe Street, #1204, Denver, Colorado 80202.

2. Stacey Mastriona (n/k/a Stacey Moore, but no relation to the respondent) was the Deputy District Attorney who was handling *People v. (name not provided)*, a juvenile matter, 02JD985, in Adams County District Court.

3. On October 21, 2002, attorney Mastriona received a phone call from

the respondent, Jerome A. Moore. At that time, the respondent advised Ms. Mastriona that he was representing the juvenile in the above matter and wished to obtain discovery of the criminal file.

4. Ms. Mastriona instructed the respondent to file an entry of appearance with the district attorney's office and with the court. Ms. Mastriona advised Mr. Moore that the district attorney's policy was to require such documentation before they would permit someone to review and/or copy a file.

5. On October 24, 2002, the Adams County District Attorney's office received a faxed copy of an entry of appearance, a copy of which is attached hereto as Exhibit A, and incorporated herein. The entry identified Jerome A. Moore as an attorney duly licensed to practice law in the State of Colorado with a registration number of 66756. The entry gave Mr. Moore's address as 1955 Arapahoe Street, #1204, Denver, Colorado 80202. The document represented that Mr. Moore was entering his appearance as counsel for the juvenile in the juvenile proceeding. The document was dated October 23, 2002, and contained Mr. Moore's signature.

6. On October 30, 2002, Mr. Moore arrived at the district attorney's office, reviewed the juvenile file, made several copies, but was unable to pay for them. Thus, the secretary refused to release the copies to him and he left.

7. Subsequently, Chief Trial Deputy District Attorney Francis Wasserman learned from the Colorado Supreme Court Office of Attorney Registration that no one by the name of Jerome A. Moore was a licensed attorney in the State of Colorado.

8. Deputy District Attorney Wasserman contacted the juvenile's father, and learned that the father had been told Moore was an attorney and hired Moore to represent his daughter, and paid Moore \$275.00.

9. On November 7, 2002, there was a court appearance in the juvenile matter. Mr. Moore appeared and indicated he was the attorney for the juvenile and stated that he was entering an appearance on his behalf.

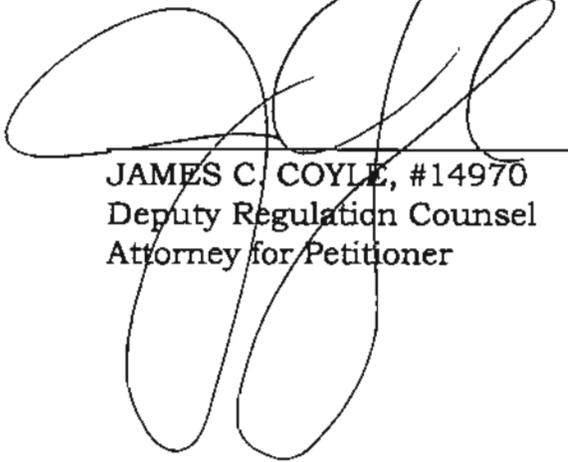
10. Magistrate Robert S. Doyle was notified ahead of time that Mr. Moore may not be an attorney. Magistrate Doyle engaged in an exchange wherein Mr. Moore continued to insist that he was a licensed attorney, that he had practiced "for about a year and a half," and that he accepted \$275.00 from the juvenile's father to act as their attorney. Again, Mr. Moore filed an entry of appearance in the same format as that filed with the district attorney's office.

11. When confronted by Magistrate Doyle that he had learned that Mr. Moore was not a licensed attorney and that his alleged registration number (66756) was not valid and clearly beyond the range of current active numbers, Mr. Moore requested that he be allowed to withdraw "as attorney of record."

12. By holding himself out as an attorney to the juvenile, the juvenile's father, the district attorneys office, and Magistrate Doyle; by entering his appearance as attorney of record to represent a juvenile's interest in an ongoing criminal matter, and thereby obtaining access to a juvenile file; and by making a court appearance "as attorney of record," 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; order the refund of any and all fees paid by clients to the respondent; and assess restitution against the respondent for losses incurred by clients or third parties as a result of the respondent's conduct; and any other relief deemed appropriate by this court.

Respectfully submitted this 30th of September, 2003.



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

ENTRY OF APPEARANCE BY COUNSEL

I, Jerome A. Moore, Attorney duly licensed to practice
(PLEASE PRINT NAME)

law in the State of Colorado, Registration number 66756

Address 1955 Arapahoe St #1204 Den Co 80202

Phone number 720-298-4464, hereby enter my appearance as

counsel for _____, in ^{Adams} Denver Juvenile Court
(NAME OF PARTY)

case number 0270985, entitled: The People of the State of

Colorado in the Interest of _____, child/ren,

this 23rd day of October, 20 02

Signature of attorney: Jerome A. Moore

8888-123-000-0000
EXHIBIT
A