

TKR Tech, Inc.
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Arizona State Bar
4201 N. 24th Street
Phoenix, AZ 85016

RE: Formal Ethics Complaint Against:
Joe M. Romley – SBN #001786
4647 N. 32nd Street, Suite 120
Phoenix, AZ 85018
(602) 528-4710

July 11, 2018

Dear State Bar of Arizona,

The factual basis for this complaint arises from Joe M. Romley misconduct in Case No. FC2011-005859, Lois Ann Flynn vs. Charles David Rodrick (*hereinafter*, “family case”), that has been adjudicated in the Superior Court of the State of Arizona in and for the County of Maricopa before the Honorable Timothy J. Thomason (*hereinafter*, “Judge Thomason”). Due to the unethical conduct of Romley willingly making knowingly false and defamatory allegations against an employee of TKR Tech, Inc, Kelley Bradbury, (*hereinafter*, “TKR”). TKR has been severely damaged in their business affairs.

According to the Arizona State Bar Association’s Preamble, lawyers should conduct themselves **honorably** and a lawyer should use the law's procedures only for legitimate purposes and **not to harass or intimidate others.** This is clearly not the case of attorney Joe M. Romley, who vehemently seems to be on a path to destroy anyone even remotely connected to Mr. Charles Rodrick (*hereinafter*, “Rodrick”). Our employee, Kelley Bradbury (*hereinafter*, “Bradbury”) has been under attack by attorney Joe M. Romley for several years now¹. Attorney Joe M. Romley (*hereinafter*, “Romley”) in under the misunderstanding that Bradbury is a direct employee of Rodrick, when is fact she is contracted through our firm as an assistant to Rodrick. Even the simplest of due diligence on Romley’s part would have confirmed that Bradbury is TKR’s employee and not Rodrick’s. However, in his quest for revenge against Rodrick, Romley has failed to preform any type of due diligence but has instead continued his pattern of harassment of Bradbury and in turn our firm.

¹ This matter will be addressed under separate cover submitted by Bradbury.

Based on our firm's first-hand experience it is unquestionable that Joe M. Romley has willfully and repeatedly violated his ethical duties and obligations as an attorney as defined by the Arizona Duties and Obligations. Our firm's assertions are based on the stated requirements of the Arizona Rules of Professional Conduct contained within Rule 42 (*hereinafter*, "Rules"), Arizona Revised Superior Court, by engaging in repeated instances of violating ER 1.1, ER 3.1, ER 3.3, ER 4.1, ER 4.4 and ER 8.4. The seriousness and scope of the misconduct perpetrated by Joe M. Romley over an extended period of time amounting to many years' calls for an extensive review of the entire circumstances outlined below. The specific violations committed by Joe M. Romley are governed by the following Rule 42 dictates:

1. ER 1.1. Competence

A lawyer shall provide competent representation to a client. Competent representation requires the legal knowledge, skill, thoroughness and preparation reasonably necessary for the representation.

2. ER 3.1 – Meritorious Claims and Contentions. A lawyer shall not bring or defend a proceeding, or assert or controvert an issue therein, unless there is a good faith basis in law and fact for doing so that is not frivolous, which may include a good faith and nonfrivolous argument for an extension, modification or reversal of existing law.

3. ER 3.3 – Candor Toward the Tribunal. (a) A lawyer shall not knowingly: (1) make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer.

4. ER 4.1. Truthfulness in Statements to Others

In the course of representing a client a lawyer shall not knowingly:

(a) make a false statement of material fact or law to a third person

5. ER 4.4 – Respect for Rights of Others. (a) In representing a client, a lawyer shall not use means that have no substantial purpose other than to embarrass, delay, or burden any other person, or use methods of obtaining evidence that violate the legal rights of such a person.

6. ER 8.4 – Misconduct. It is professional misconduct for a lawyer to: (a) violate or attempt to violate the Rules of Professional Conduct, knowingly assist or induce another to do so, or do so through the acts of another.

Our firm is requesting that the SBA assign a Bar Counsel to review the misconduct of Joe M. Romley and recommend the appropriate disciplinary procedures for the circumstances involved in repeated ethical violations of the Rules. We are requesting after a thorough investigation and the appropriate disciplinary process that Joe M. Romley be sanctioned in the form of permanent disbarment and/or a mental health evaluation. If the SBA is to hold true to any part of their preamble, mission statement, vision and core values, then the only viable conclusion to this matter is the disbarment of Romley or at the very least a mental health evaluation to ensure he is even still fit to practice law in the State of Arizona or anywhere for that matter, as Romley has continually thumbed his nose at the Rules for many, many, many years, as his conduct dictates.

The allegations herein regarding Joe M. Romley's misconduct are summarized as follows:

The Family Case:

Most recently, Attorney Joe M. Romley willingly and knowingly made false allegations in the family case directly related to non-party Bradbury and therefore TKR Tech, Inc.

On March 3, 2018, Joe M. Romley filed a Supplement To Petitioner's Prehearing Statement claiming "Bradbury is the individual responsible for preparing pleadings, motions and e-mails for respondent in this action. Ms. Bradbury is not a licensed or supervised paralegal or a certified document preparer." This absurd accusation is fully without merit and had absolutely no place having been entered into the Court Record and clearly violates the Rules outlined above. Specifically, Romley's main intention was to try and somehow place Bradbury and thus, subsequently, TKR in a bad light with the Court. Not to mention, there was no due diligence on the part of Romley before he admitted his unfounded statements in the Court record.

On April 24, 2018, a hearing was held before Judge Thomason in the family case to address a Motion for Contempt of Court filed by attorney Joe M. Romley against Rodrick. The significance of this Hearing is that Romley, once again brought Bradbury and thus, subsequently, TKR into the hearing, by grilling Rodrick on the witness stand as to what role Bradbury played as his assistant. This Hearing was a Contempt of Court Hearing regarding non-payment of a civil judgment for attorney's fees, nothing more, nothing less and Romley's insistence to once again try and place Bradbury and thus, subsequently, TKR in bad light only furthers his blatant and willful disregard of the Rules. Romley, with absolutely no factual or legal basis to do so, other than the continuation of years of harassment, continues his plight to harass Bradbury and thus, subsequently, TKR. Romley's contention before the Court was clearly to try and blame his failure to properly litigate his claims on innocent Bradbury and thus, subsequently, TKR. There is absolutely no evidence to substantiate Romley's ludicrous claims against Bradbury and thus, subsequently, TKR. In fact, with even the most basic of research easily available as required per the Rules and/or Rule 11 due diligence required of an attorney would have established the fallacy of such incompetent assertions. Just because Romley is an attorney, does give him the right to use the Court as a hammer to recurrently harass Bradbury and thus, subsequently, TKR with his grudge against Rodrick and is reprehensible and a clear ethical violation of the Rules.

Noted in the Minute Entry of April 5, 2018, filed weeks before the April 24, 2018, hearing, the Court stated that it was a waste of time to proceed with this farce of a Hearing; However, Romley insisted on continuing with the Hearing and Romley's ultimate agenda was made crystal clear during the Hearing in which he continued his witch hunt against Bradbury and thus, subsequently, TKR, all to no avail, as the Court deemed most of the evidence presented by Petitioner at the Hearing as "irrelevant". However, Romley's use of the Court system to further his insufferable scheme of revenge against Rodrick and anyone even remotely associated with him, including Bradbury and thus, subsequently, TKR, only furthers our firm's stance that Romley has no regard what-so-ever for the Rules

and should be stopped from any further harassment of Bradbury and thus, subsequently, TKR.

7. Attorney Joe M. Romley willfully engaged in unethical conduct as a means to continue his practice of harassing Bradbury and thus, subsequently, TKR knowing he was in clear violation of **ER 1.1. Competence, ER 3.1 – Meritorious Claims and Contentions, ER 3.3 – Candor Toward the Tribunal, ER 4.1 - Truthfulness in Statements to Others, ER 4.4 – Respect for Rights of Others, and ER 8.4 – Misconduct.**

TKR Tech, Inc. is not an Arizona-based Corporation, and is organized to perform any and all lawful business. The hiring of clerical assistants for our client base clearly falls into that category and our firm stands resolutely behind any administrative assistant duties Bradbury has performed for Rodrick. TKR relies on business referrals from current clients and by being unnecessarily drug through the mud all for Romley's benefit is nothing short of pure harassment and has harmed our business relationships with potential clients. While believing that Romley would eventually desist in his attacks against Bradbury and thus, subsequently, TKR, it has become abundantly clear that this is not the case and until Romley is sanctioned for his unethical behaviors, his plight will continue. It is not our firm's posture to start or continue more legal battles, but to necessitate the SBA's intervention to put an end to Romley's continuous attacks of harassment against Bradbury and thus, subsequently, TKR and his clear violation of the Rules.

In his plight for revenge against Rodrick, Romley has gone so far as to file a Bar Complaint against Bradbury, who is not even employed in the SBA's jurisdiction. This complaint was deemed unfounded by the SBA; However, the damage that may have been caused to Bradbury's and thus, subsequently, TKR's reputation is irreprehensible and was fully without any merit, due diligence and is in violation of the Rules. TKR has advised Bradbury to file her own SBA complaint against Romley to ensure this harassment ceases and Romley is investigated for his blasphemous and ethical violations and malfeasance.

Perhaps, the SBA should take into consideration that Romley is so blinded by hate and revenge for Rodrick that his mental capacity is becoming diminished and he has forgotten exactly what it means to be an ethical attorney. Romley is quite elderly and is obviously not mentally fit to practice law at this juncture of his life-stage if he cannot remember even the simplest of ethical Rules.

In addition, Romley has perpetrated his ethical violations on Bradbury and thus, subsequently, TKR for over five (5) years now and Bradbury will be addressing these issues in her separate SBA Complaint against Romley.

CONCLUSION

The complaint I have submitted on behalf of TKR Tech, Inc. to the SBA is specifically addressing the most recent events which occurred only in 2018 involving the family case, there are many more instances which can and will be detailed under separate cover should the SBA actually decide to stand up and stop Romley once and for all. The time has come to put an end to this form of harassment and ethical violations once and for. Bradbury and thus, subsequently, TKR, were used as pawns in Romley's revenge-based game of vendetta against Rodrick for the pure amusement of Romley, as was clearly concluded by Judge Thomason at the April 24, 2018, Hearing, as most of the evidence presented by Petitioner at the Hearing was "irrelevant". On behalf of TKR Tech, Inc. I am requesting the SBA carry out its obligation and investigate the continued ethical violations continually being committed by Joe M. Romley against Bradbury and thus, subsequently, TKR.

It is the State Bar's responsibility to protect the public from obtrusive violations of the Rules by rogue attorneys. Romley's continued proclivity to willfully and knowingly violate the Rules must be addressed by the SBA in order to protect the public from such vile and unethical practices.

For all the above-stated reasons, the State Bar needs to conduct an in-depth investigation into the allegations outlined in detail in this complaint regarding attorney Joe M. Romley. As stated, on behalf of TKR Tech, Inc., I am requesting Joe M. Romley be sanctioned in the form of permanent disbarment and/or a mental evaluation be mandated upon him for such ethical violations of the Rules which clearly establish his open contempt toward the Rules, preamble and mission statement of the SBA and to make public his multiple acts of transgressions in order of justice and to protect the public from this unscrupulous attorney.

Respectfully submitted this 11th day of July, 2018,



Kayla M. Roughte, VP
TKR Tech, Inc.