

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

CASE NO. 02SA11

ORIGINAL PROCEEDING IN  
UNAUTHORIZED PRACTICE OF LAW

Petitioner:

THE PEOPLE OF THE STATE OF COLORADO,

v.

Respondents:

CANDACE ARNOLD and PAGE ARNOLD.

RECEIVED

JAN 30 2002

ATTORNEY  
REGULATION

ORDER OF COURT

Upon consideration of the Stipulation, Agreement and Affidavit Consenting to an Order of Injunction, and being sufficiently advised in the premises,

IT IS ORDERED that the Stipulation is Approved and the Respondents herein are ENJOINED from the unauthorized practice of law.

IT IS FURTHER ORDERED that the Respondents pay the costs of this action in the amount of \$91.00 within thirty (30) days.

BY THE COURT, January 29, 2002

cc:

James C. Coyle  
Assistant Regulation Counsel

Candace and Page Arnold  
7625 W. 5<sup>th</sup> Ave., Suite 108-N  
Lakewood, CO 80226



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JAN 17 2002

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

ORIGINAL PROCEEDING IN UNAUTHORIZED  
PRACTICE OF LAW

Petitioner:  
THE PEOPLE OF THE STATE OF COLORADO

vs.

Respondents:  
CANDACE ARNOLD and PAGE ARNOLD

James C. Coyle # 14970  
Assistant Regulation Counsel  
Attorney for Petitioner  
600 17<sup>th</sup> Street, Suite 200-South  
Denver, CO 80202  
Phone Number: (303) 893-8121, ext. 328  
Fax Number: (303) 893-5302

Candace Arnold  
Page Arnold  
Respondents

▲ COURT USE ONLY ▲

Case Number: 02 SA 0011

**STIPULATION, AGREEMENT AND AFFIDAVIT CONSENTING TO AN ORDER  
OF INJUNCTION**

On this 17<sup>th</sup> day of January, 2002, James C. Coyle, Assistant Regulation Counsel, and Candace Arnold and Page Arnold, the respondents enter into the following stipulation, agreement, and affidavit consenting to an order of injunction ("stipulation") and submit the same to the Colorado Supreme Court for an order of injunction pursuant to C.R.C.P. 229-237.

1. The respondents reside at 7625 W. 5<sup>th</sup> Avenue, Lakewood, Colorado 80226. The respondents are not licensed to practice law in the State of Colorado.

2. The respondents enter into this stipulation freely and voluntarily. No promises have been made concerning future consideration, punishment, or lenience in the above-referenced matter. It is the respondents' personal decision, and the respondents affirm there has been no coercion or other intimidating acts by any person or agency concerning this matter.

3. The respondents are familiar with the rules of the Colorado Supreme Court regarding the unauthorized practice of law. The respondents acknowledge the right to a full and complete evidentiary hearing on the above-referenced petition for injunction. At any such hearing, the respondents would have the right to be represented by counsel, present evidence, call witnesses, and cross-examine the witnesses presented by the petitioner. At any such formal hearing, the petitioner would have the burden of proof and would be required to prove the charges contained in the petition for injunction. Nonetheless, having full knowledge of the right to such a formal hearing, the respondents waive that right.

5. The respondents and the petitioner stipulate to the following facts and conclusions:

a. Colorado Law Works, Inc. (Colorado Law Works) is a closely held Colorado corporation. Candace and Page Arnold are its sole officers, directors, shareholders and employees. Colorado Law Works conducts a business of preparing various legal documents, including bankruptcy petitions, schedules and statements of affairs. Colorado Law Works operates under the tradename Eagle Paralegals, LTD.

b. Candace Arnold prepares the bankruptcy documents. Ms. Arnold uses a bankruptcy computer program which generates a questionnaire which the prospective debtor completes. Based on the information input by Ms. Arnold from the completed questionnaire, the program prepares bankruptcy documents which substantially conform to the official bankruptcy form petition, schedules and statements of affairs.

c. Page Arnold works as the office manager and secretary. He answers telephone calls, schedules appointments and meets with prospective debtors. At such a meeting, the prospective debtor is provided with a disclosure which states that Colorado Law Works, d/b/a Eagle Paralegal, LTD, is not staffed by attorneys and does not provide legal services. After obtaining a signature on the disclosure, Page Arnold then provides the prospective debtor with the questionnaire, reviews responses, answers questions and supplies information about the bankruptcy process and how bankruptcy law applies to the individual's

circumstances.

d. Using its trade name, Eagle Paralegals, LTD, Colorado Law Works and Candace Arnold prepared the bankruptcy petition, schedules and statements of affairs filed by Monica Gomez in *In re: Monica R. Gomez*, 00-17455 MSK, United States Bankruptcy Court for the District of Colorado. Page Arnold was the contact person who met with Candace Arnold. Mr. Arnold reviewed Ms. Gomez' questionnaire responses, answered questions and supplied information about how the bankruptcy court would process Ms. Gomez' case.

e. For preparation of the bankruptcy documents, Ms. Gomez paid a fee of \$199.00. Colorado Law Works mailed the documents to Ms. Gomez and she filed them with the Bankruptcy Court on June 26, 2000. Ms. Gomez has received a discharge. The deficiencies or inaccuracies contained in the documents prepared for her have not resulted in any delay or cost to her.

f. By providing legal advice to Ms. Gomez and preparing pleadings on Ms. Gomez' behalf without the supervision of a licensed attorney, the respondents 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)).

g. The respondents have refunded Ms. Gomez' \$199.00 in fees.

6. The respondents have read and studied the petition for injunction and are familiar with the allegations therein, and a true and correct copy of the petition for injunction is attached to this stipulation as exhibit A.

7. Pursuant to C.R.C.P. 251.32, the respondents agree to pay the costs and administrative costs in the sum of \$91.00 incurred in conjunction with this matter within thirty (30) days after the acceptance of the stipulation by the Colorado Supreme Court.

#### **RECOMMENDATION FOR AND CONSENT TO ORDER OF INJUNCTION**

Based on the foregoing, the parties hereto recommend that an order be entered enjoining the respondents from the unauthorized practice of law, and requiring that the respondent pay costs in the amount of \$91.00.

Candace Arnold and Page Arnold, the respondents, and the petitioner's attorney, James C. Coyle, acknowledge by signing this document that they have read and reviewed the above.

STATE OF COLORADO )  
 ) ss:  
COUNTY OF JEFFERSON )

Candace Arnold  
Candace Arnold, Respondent  
7625 West 5<sup>th</sup> Avenue, Suite 108-N  
Lakewood, Colorado 80226  
Telephone (303) 274-1558

Subscribed and sworn to before me this 16th day of January, 2002, by Candace Arnold, respondent.

Witness my hand and official seal.  
E. L. SORENSEN  
NOTARY PUBLIC  
STATE OF COLORADO

E. L. Sorensen  
Notary Public  
My commission expires: 5-26-04

STATE OF COLORADO )  
 ) ss:  
COUNTY OF JEFFERSON )

Page Arnold  
Page Arnold, Respondent  
7625 West 5<sup>th</sup> Avenue, Suite 108-N  
Lakewood, Colorado 80226  
Telephone (303) 274-1558

Subscribed and sworn to before me this 16th day of January, 2002, by Page Arnold, respondent.

Witness my hand and official seal.  
E. L. SORENSEN  
NOTARY PUBLIC  
STATE OF COLORADO

E. L. Sorensen  
Notary Public  
My commission expires: 5-26-04

James C. Coyle, #14970  
Assistant Regulation Counsel  
Attorney for Petitioner