

Colorado Supreme Court 2 East 14th Avenue Denver, CO 80203	DATE FILED: October 21, 2015 CASE NUMBER: 2015SA245
Original Proceeding in Unauthorized Practice of Law, Office of Attorney Regulation Counsel, 2015UPL004	
<b>Petitioner:</b>  The People of the State of Colorado,  <b>v.</b>  <b>Respondent:</b>  Iris Kay Barratt, d/b/a Life Plan Now.	Supreme Court Case No: 2015SA245
<b>ORDER OF INJUNCTION</b>	

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

IT IS ORDERED that Respondent, IRIS KAY BARRATT, d/b/a LIFE PLAN NOW, shall be, and the same hereby is, ENJOINED from engaging in the Unauthorized Practice of Law in the State of Colorado.

IT IS FURTHER ORDERED that Respondent, IRIS KAY BARRATT, d/b/a LIFE PLAN NOW, shall pay RESTITUTION plus interest at 8% per annum, compounded annually to the following individuals as detailed in the Stipulation, Agreement and Affidavit,

Phyllis Johnson Murphy

Brent Charles Cummings

Dave Cubberly Watne

Judy Darlene Jentink

Michael Lamont Fales

Tania Umpierre

Katherine Anderson

Carolyn Ruth Alexander

Anne K. Meier

Lydia Niederwerfer

Maria Bisiar

Edward Bisiar

Derryl Ray Taylor

Anna Bernstein

Emilie Zepernick

Mickie Marie McNeely

James R. McNeely

Barbara Sanchez

Twila Mae Rushton

James Richard Rushton

Kimberly Dee Burnett

Rockie Lance Burnett

John Goodman

Aleia Schaum

Deborah Jo White Kanatzar

Margaret Lee Battles

James Michael Donovan

Darlene Marie Johnson

Marie L. Hagin

Terry Lee Hagin

Benjamin M. Straily

Lorraine Catherine Veith

DaNae Lynn Huff

James Michael Donovan

Rebecca Ann Pearson-Phillips

Timothy John Hughes

Kathleen Margaret Hughes

Fatima Oden

IT IS FURTHER ORDERED that IRIS KAY BARRATT, d/b/a LIFE PLAN NOW, is assessed costs in the amount of \$584.60. Said costs to be paid to the Office of Attorney Regulation Counsel within (30) days of the date of this order.

IT IS FURTHER ORDERED that this court WAIVES any fines in this matter.

BY THE COURT, OCTOBER 21, 2015

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

DATE FILED: October 19, 2015 10:35 AM  
FILING ID: 8C26FE137F785  
CASE NUMBER: 2015SA245

ORIGINAL PROCEEDING IN UNAUTHORIZED  
PRACTICE OF LAW, 15UPL004

Petitioner:  
THE PEOPLE OF THE STATE OF COLORADO

Respondents:  
IRIS KAY BARRATT, d/b/a LIFE PLAN NOW

▲ COURT USE  
ONLY ▲

Kim E. Ikeler, #15590  
Assistant Regulation Counsel  
Attorney for Petitioner  
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Denver, Colorado 80203  
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Fax No.: (303) 501-1141  
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Case Number:  
15SA245

Iris Kay Barratt  
13762 S. Elk Creek Rd.  
Pine, Colorado 80470-9401

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

On this 14<sup>th</sup> day of October 2015, Kim E. Ikeler, Assistant Regulation Counsel, and Iris Kay Barratt, who did business as Life Plan Now, the Respondent, 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 a finding and order of injunction pursuant to C.R.C.P. 229-237.

1. Respondent Barratt's address is 13762 S. Elk Creek Rd., Pine, Colorado 80470-9401. Respondent Barratt is not licensed to practice law in the State of Colorado or any state.

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

3. Respondent is familiar with the rules of the Colorado Supreme Court regarding the unauthorized practice of law. Respondent acknowledges the right to a full and complete evidentiary hearing on the above-referenced petition for injunction. At any such hearing, Respondent 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 by a preponderance of the evidence. Nonetheless having full knowledge of the right to such a formal hearing, the Respondent waives that right.

4. Respondent understands that the practice of law in Colorado includes, but is not limited to, the following:

- a. providing advice to any other individual on the legal effect of any proposed action in a legal matter; or assisting that individual in making decisions that require legal judgment and a knowledge of the law that is greater than the average citizen;
- b. providing advice to any other individual as to various legal remedies available to that individual and the possible legal courses of action for that individual;
- c. acting in a representative capacity on behalf of any other individual in matters that affect that individual's legal rights and duties;
- d. selecting or preparing any legal document for any other individual, other than solely as a typist; and, without limiting the above, explaining to that individual or any other individual the legal significance of such document;
- e. holding oneself out as an attorney, lawyer, "esquire", immigration consultant, or legal consultant, either directly or impliedly;
- f. holding oneself out to others in a manner that another individual would place some reliance on the Respondent to handle that individual's legal matters;
- g. advertising oneself as an immigration consultant, or being able to select and prepare immigration paperwork on behalf of others (without U.S.B.I.A. accreditation);
- h. making an appearance or speaking on behalf of another individual in negotiations, settlement conferences, mediations, hearings, trials, oral arguments or other legal proceedings unless specifically allowed by the rules that apply to such appearance in such legal proceeding;
- i. serving as a conduit or intermediary on behalf of any other individual for the obtaining or relaying of any legal counsel;
- j. conducting the business of management of a law practice to the extent that the exercise of legal judgment on behalf of another occurs; and
- k. soliciting or accepting any fees for legal services.

5. Respondent and the Petitioner stipulate to the following facts and conclusions:

a. Respondent engaged in a business of providing estate-planning documents to customers to complete, and notarizing the completed documents.

b. To promote her business, Respondent advertised on the Internet.

c. Her LinkedIn profile stated in pertinent part:

I specialize in assisting clients in understanding and documenting their choices for four specific documents of major importance. These documents are: Last Will & Testament, General Durable Power of Attorney, Living Will, and Medical Power of Attorney. ... Come to our workshop and get this all for only \$250 per person. ... We provide education, instruction, documents, witnesses and notary services.

d. Respondent also distributed leaflets informing the public about her workshops, at which she would select and provide forms of wills, powers of attorney and living wills to customers for \$250 apiece, which price included notarization of the final documents.

e. Respondent hosted workshops, including at the Evergreen Library.

f. At the workshops, Respondent provided to customers forms for wills, powers of attorney, and living wills that she had selected for the customers.

g. The customers filled in blanks on the forms, then signed before Respondent acting as the notary.

h. Respondent initially charged each person \$150 for these services, but

later increased her price to \$250.

i. Respondent took fees from dozens of persons for whom she selected provided estate-planning forms, whose names appear on Exhibit A hereto.

6. Respondent has read and studied the Petition for Injunction and is with the allegations therein, and a true and correct copy of the Petition for Injunction is attached to this stipulation as Exhibit B.

7. Pursuant to C.R.C.P. 237(a), Respondent agrees to pay the costs and administrative costs in the sum of \$584.60 incurred in conjunction with this matter within 30 days after the acceptance of the stipulation by the Colorado Supreme Court.

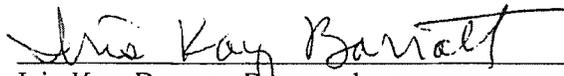
8. Respondent further agrees to refund the amounts paid to her, listed on the attached Exhibit A, plus interest at 8% per annum, compounded annually, to each of the listed customers upon approval of this Stipulation by the Court. Interest will be computed at 8% per annum from the date paid and continuing on the unpaid balance through the date each refund is paid in full.

9. Based on Respondents' cooperation in entering into this Stipulation, the parties ask that the Court exempt Respondent from a fine.

RECOMMENDATION FOR AND CONSENT TO ORDER OF  
INJUNCTION

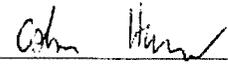
Based on the foregoing, the parties hereto recommend that an order be entered enjoining Respondent from the unauthorized practice of law, and requiring that Respondent pay restitution to each of Respondent's customers listed in Exhibit A, in the amounts listed on Exhibit A, plus interest as described above, and costs in the amount of \$584.60.

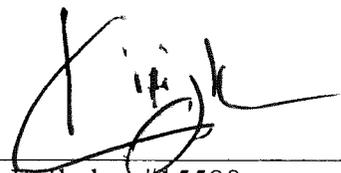
Iris Kay Barratt, the Respondent; and Kim E. Ikeler, attorney for Petitioner, acknowledge by signing this document that they have read and reviewed the above.

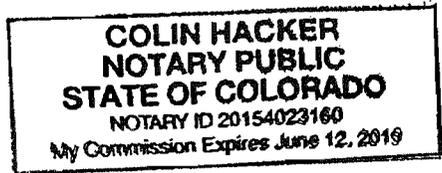
  
\_\_\_\_\_  
Iris Kay Barratt, Respondent  
13762 S. Elk Creek Rd.  
Pine, Colorado 80470-9401

STATE OF COLORADO     )  
  ) ss.  
COUNTY OF JEFFERSON    )

Subscribed and sworn to before me this 14 day of October 2015, by Iris Kay Barratt, known to me. Witness my hand and official seal. My commission expires: June 12, 2019.

  
\_\_\_\_\_  
Notary Public

  
\_\_\_\_\_  
Kim E. Ikeler, #15590  
Assistant Regulation Counsel  
Attorney for Petitioner



Phyllis Johnson Murphy, 23996 Logan Ave., Buffalo Creek, CO 80425,  
paid \$150 on 3-18-10.

Principal plus Interest through October 31, 2015 equals \$214.92. An additional .03  
cents interest charge per day begins November 1, 2015.

Brent Charles Cummings, 2620 W. 26<sup>th</sup> Ave., Denver, CO 80211,  
paid \$150 on 6-14-11.

Principal plus Interest through October 31, 2015 equals \$201.15. An additional .03  
cents interest charge per day begins November 1, 2015.

Dave Cubberly Watne, 2809 SE Grapevine Rd., Idledale, CO 80453,  
paid \$60 on 9-15-11.

Principal plus Interest through October 31, 2015 equals \$78.52. An additional .01  
cent interest charge per day begins November 1, 2015.

Judy Darlene Jentink, 1182 Burland Dr., Bailey CO 80421,  
paid \$150 on 9-15-11.

Principal plus Interest through October 31, 2015 equals \$198.36. An additional .03  
cents interest charge per day begins November 1, 2015.

Michael Lamont Fales, 7131 Raritan St., Denver, CO 80221,  
paid \$150 on 9-15-11.

Principal plus Interest through October 31, 2015 equals \$198.36. An additional .03  
cents interest charge per day begins November 1, 2015.

Tania Umpierre, 11940 E. Maple Ave., Aurora, CO 80012,  
paid \$150 on 9-15-11.

Principal plus Interest through October 31, 2015 equals \$198.36. An additional .03  
cents interest charge per day begins November 1, 2015.

Katherine Anderson, 7040 Peaceful Hills Way, Morrison, CO 80465,  
paid \$150 on 10-06-11.

Principal plus Interest through October 31, 2015 equals \$197.67. An additional .03  
cents interest charge per day begins November 1, 2015.

Carolyn Ruth Alexander, 2418 Hearth Dr., #7, Evergreen, CO 80439,  
paid \$60 on 10-06-11.

Principal plus Interest through October 31, 2015 equals \$78.31. An additional .01  
cent interest charge per day begins November 1, 2015.



Anne K. Meier, 32381 Horseshoe, Evergreen, CO 80439,  
paid \$150 on 10-06-11.

Principal plus Interest through October 31, 2015 equals \$197.67. An additional .03 cents interest charge per day begins November 1, 2015.

Lydia Niederwerfer, 10473 Horizon View Drive, Morrison, CO 80465,  
paid \$150 on 12-12-11.

Principal plus Interest through October 31, 2015 equals \$195.72. An additional .03 cents interest charge per day begins November 1, 2015.

Maria Bisiar, 3661 Evergreen Parkway, #A, Evergreen, CO 80439,  
paid \$150 on 12-27-11.

Principal plus Interest through October 31, 2015 equals \$195.27. An additional .03 cents interest charge per day begins November 1, 2015.

Edward Bisiar, 3661 Evergreen Parkway, #A, Evergreen, CO 80439,  
paid \$150 on 12-27-11.

Principal plus Interest through October 31, 2015 equals \$195.27. An additional .03 cents interest charge per day begins November 1, 2015.

Derryl Ray Taylor, 207 Miners Way, Bailey, CO 80421,  
paid \$150 on 4-06-12.

Principal plus Interest through October 31, 2015 equals \$191.13. An additional .03 cents interest charge per day begins November 1, 2015.

Anna Bernstein, 101 Chapparral Circle, Glenwood Springs, CO 81601,  
paid \$150 on 7-21-12.

Principal plus Interest through October 31, 2015 equals \$183.57. An additional .03 cents interest charge per day begins November 1, 2015.

Emilie Zepernick, 101 Chapparral Circle, Glenwood, Springs, CO 81601,  
paid \$150 on 7-21-12.

Principal plus Interest through October 31, 2015 equals \$183.57. An additional .03 cents interest charge per day begins November 1, 2015.

Mickie Marie McNeely, 16315 E. Carolina Dr., Aurora, CO 80017,  
paid \$150 on 8-07-12.

Principal plus Interest through October 31, 2015 equals \$187.56. An additional .03 cents interest charge per day begins November 1, 2015.

James R. McNeely, 16315 E. Carolina Dr., Aurora, CO 80017,  
paid \$150 on 8-07-12.

Principal plus Interest through October 31, 2015 equals \$187.56. An additional .03  
cents interest charge per day begins November 1, 2015.

Barbara Sanchez, 4900 S. Grant Street., Englewood, CO 80113,  
paid \$150 on 4-03-13.

Principal plus Interest through October 31, 2015 equals \$179.31. An additional .03  
cents interest charge per day begins November 1, 2015.

Twila Mae Rushton, 6843 Deer Path, Evergreen, CO 80439,  
paid \$150 on 4-03-13.

Principal plus Interest through October 31, 2015 equals \$179.31. An additional .03  
cents interest charge per day begins November 1, 2015.

James Richard Rushton, 6843 Deer Path, Evergreen, CO 80439,  
paid \$150 on 4-03-13.

Principal plus Interest through October 31, 2015 equals \$179.31. An additional .03  
cents interest charge per day begins November 1, 2015.

Kimberly Dee Burnett, 13831 Pine Valley Road, Pine, CO 80470,  
paid \$150 on 5-18-13.

Principal plus Interest through October 31, 2015 equals \$177.96. An additional .03  
cents interest charge per day begins November 1, 2015.

Rockie Lance Burnett, 13831 Pine Valley Road, Pine, CO 80470,  
paid \$150 on 5-19-13.

Principal plus Interest through October 31, 2015 equals \$177.93. An additional .03  
cents interest charge per day begins November 1, 2015.

John Goodman, 1370 Squaw Mountain Trail, Idaho Springs, CO 80452,  
paid \$150 on 5-19-13.

Principal plus Interest through October 31, 2015 equals \$177.93. An additional .03  
cents interest charge per day begins November 1, 2015.

Aleia Schaum, 1370 Squaw Mountain Trail, Idaho Springs, CO 80452,  
paid \$150 on 5-19-13.

Principal plus Interest through October 31, 2015 equals \$177.93. An additional .03  
cents interest charge per day begins November 1, 2015.

Deborah Jo White Kanatzar, 17 Farm Road, Baily, CO 80421,  
paid \$150 on 5-28-13.

Principal plus Interest through October 31, 2015 equals \$177.66. An additional .03 cents interest charge per day begins November 1, 2015.

Margaret Lee Battles, 5882 S. Sheridan Blvd., Littleton, CO 80123,  
paid \$150 on 6-30-13.

Principal plus Interest through October 31, 2015 equals \$176.67. An additional .03 cents interest charge per day begins November 1, 2015.

James Michael Donovan, 28732 Kincaid Springs Road, Pine, CO 80470,  
paid \$20 on 9-01-13.

Principal plus Interest through October 31, 2015 equals \$25.86. An additional .01 cent interest charge per day begins November 1, 2015.

Darlene Marie Johnson, 5206 Lilac Lane, Denver, CO 80221,  
paid \$150 on 9-21-13.

Principal plus Interest through October 31, 2015 equals \$174.18. An additional .03 cents interest charge per day begins November 1, 2015.

Marie L. Hagin, 31239 Timothys Trail, Conifer, CO 80433,  
paid \$20 on 11-11-13.

Principal plus Interest through October 31, 2015 equals \$25.15. An additional .01 cent interest charge per day begins November 1, 2015.

Terry Lee Hagin, 31239 Timothys Trail, Conifer, CO 80433,  
paid \$20 on 11-11-13.

Principal plus Interest through October 31, 2015 equals \$25.15. An additional .01 cent interest charge per day begins November 1, 2015.

Benjamin M. Straily, 103 Mountain Dr., Shaunee, CO 80475,  
paid \$250 on 3-12-14.

Principal plus Interest through October 31, 2015 equals \$273.87. An additional .05 cents interest charge per day begins November 1, 2015.

Lorraine Catherine Veith, 103 Mountain Dr., Shaunee, CO 80475,  
paid \$250 on 3-12-14.

Principal plus Interest through October 31, 2015 equals \$273.87. An additional .05 cents interest charge per day begins November 1, 2015.

DaNae Lynn Huff, 28732 Kincaid Springs, Rd., Pine, CO 80470,  
paid \$50 on 4-5-14  
Principal plus Interest through October 31, 2015 equals \$55.75. An additional .01  
cent interest charge per day begins November 1, 2015.

James Michael Donovan, 28732 Kincaid Springs, Rd., Pine, CO 80470,  
paid \$50 on 4-5-14  
Principal plus Interest through October 31, 2015 equals \$55.75. An additional .01  
cent interest charge per day begins November 1, 2015.

Rebecca Ann Pearson-Phillips, 28192 Shadow Mountain Dr., Conifer, CO 80433,  
paid \$250 on 9-08-14.  
Principal plus Interest through October 31, 2015 equals \$264.87. An additional .05  
cents interest charge per day begins November 1, 2015.

Timothy John Hughes, 43 Crystal Rook Road, Bailey, CO 80421,  
paid \$250 on 9-18-14.  
Principal plus Interest through October 31, 2015 equals \$264.37. An additional .05  
cents interest charge per day begins November 1, 2015.

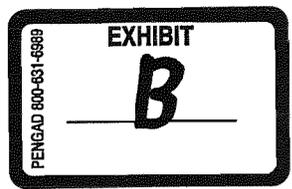
Kathleen Margaret Hughes, 33903 Martin Dr., Pine, CO 80470,  
paid \$250 on 9-18-14.  
Principal plus Interest through October 31, 2015 equals \$264.37. An additional .05  
cents interest charge per day begins November 1, 2015.

Fatima Oden, 33505 Diana Rd., Pine, CO 80470,  
paid \$100 on 12-15-14.  
Principal plus Interest through October 31, 2015 equals \$107.64. An additional .02  
cents interest charge per day begins November 1, 2015.

<p>SUPREME COURT, STATE OF COLORADO  2 E. 14<sup>th</sup> Ave.  Denver, Colorado 80203</p> <p>ORIGINAL PROCEEDING IN UNAUTHORIZED PRACTICE OF LAW, 15UPL004</p>	<p>FILED IN THE SUPREME COURT</p> <p>DATE FILED: September 14, 2015  <b>SEP 14 2015</b>  CASE NUMBER: 2015SA245</p> <p>OF THE STATE OF COLORADO  Christopher T. Ryan, Clerk</p>
<p>Petitioner:  THE PEOPLE OF THE STATE OF COLORADO</p>	<p>▲ COURT USE ONLY ▲</p>
<p>Respondent:  IRIS KAY BARRATT, d/b/a LIFE PLAN NOW</p>	<p>Case Number:  15SA245</p>
<p>Kim E. Ikeler, #15590  Assistant Regulation Counsel  Attorney for Petitioner  1300 Broadway, Suite 500  Denver, Colorado 80203  Telephone: (303) 457-5800x7863  Fax No.: (303) 501-1141  Email: K.Ikeler@csc.state.co.us</p>	
<p align="center"><b>PETITION FOR INJUNCTION</b></p>	

Petitioner, through the undersigned Assistant Regulation Counsel, and upon authorization pursuant to C.R.C.P. 234(a),<sup>1</sup> respectfully requests that the Colorado Supreme Court issue an order pursuant to C.R.C.P. 234 directing Respondent to show cause why she should not be enjoined from the unauthorized practice of law. As grounds, counsel states as follows:

<sup>1</sup> The Unauthorized Practice of Law (“UPL”) Committee authorized the filing of this petition on September 11, 2015.



## **JURISDICTION**

1. Respondent Iris Kay Barratt is a Colorado resident, with a last known business address of 13762 S. Elk Creek Road, Pine, Colorado 80470-9401.
2. Respondent Barratt is not licensed to practice law in Colorado or any other state.
3. Respondent Barratt at relevant times has done business under the trade name of Life Plan Now.
4. Respondent engaged in the unauthorized practice of law, as described below.

## **GENERAL ALLEGATIONS**

### **A. Advertising.**

1. Respondent engaged in a business of providing estate-planning documents to customers to complete, and notarizing the completed documents.
2. To promote her business, Respondent advertised on the Internet.
3. Her LinkedIn profile stated in pertinent part:  
  
I specialize in assisting clients in understanding and documenting their choices for four specific documents of major importance. These documents are: Last Will & Testament, General Durable Power of Attorney, Living Will, and Medical Power of Attorney. ... Come to our workshop and get this all for only \$250 per person. ... We provide education, instruction, documents, witnesses and notary services.
4. Respondent also distributed leaflets informing the public about her

workshops, at which she would select and provide forms of wills, powers of attorney and living wills to customers for \$250 apiece, which price included notarization of the final documents.

**B. Workshops.**

5. Respondent hosted workshops, including at the Evergreen Library.

6. At the workshops, Respondent provided to customers forms for wills, powers of attorney, and living wills that she had selected for the customers.

7. The customers filled in blanks on the forms, then signed before Respondent acting as the notary.

8. Respondent initially charged each person \$150 for these services, but later increased her price to \$250.

**C. Statement as to Harm.**

9. Respondent took fees from dozens of persons for whom she selected provided estate-planning forms.

**REQUEST FOR RELIEF**

5. The unauthorized practice of law includes but is not limited to an unlicensed person's actions 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, People v. Shell*, 148 P.3d 162, 171 (Colo. 2006).

6. Prohibited activities involve the lay exercise of *legal discretion*, such as advice to clients regarding legal matters. *People v. Adams*, 243 P.3d 256, 266 (Colo. 2010).

7. A layperson's drafting of a will for another is the unauthorized practice of law. *People ex rel. Attorney General of Colorado v. Woodall*, 128 Colo. 563, 265 P.2d 232, 233 (1954) (bank cashier engaged in the unauthorized practice of law by drafting will for a customer).

8. Respondent selected for her customers the forms of a Last Will & Testament, General Durable Power of Attorney, Living Will, and Medical Power of Attorney.

9. By selecting the forms, Respondent exercised legal discretion on behalf of her customers.

10. Respondent thereby engaged in the unauthorized practice of law.

11. The unauthorized practice of law also includes a non-lawyer holding herself out as independently able to perform legal services. *See, e.g., People ex rel. Attorney General v. Castleman*, 88 Colo. 207; 294 P. 535 (1930) (unlicensed person who advertised himself on business card as a lawyer engaged in the unauthorized practice of law); *People ex rel. Colorado Bar Ass'n v. Taylor*, 56 Colo. 441, 138 P. 762 (1914) (unlicensed person who advertised himself including on business card as a lawyer guilty of contempt of the Supreme Court); *Binkley v.*

*People*, 716 P.2d 1111, 1114 (Colo. 1986) (“Anyone advertising as a lawyer holds himself or herself out as an attorney, attorney-at-law, or counselor-at-law and, if not properly licensed, may be held in contempt of court for practicing law without a license.”).

12. Respondent advertised on the Internet and in leaflets that she could provide customers with forms for a Last Will & Testament, General Durable Power of Attorney, Living Will, and Medical Power of Attorney.

13. Respondent gave readers of her advertising the impression that she was authorized to select these forms for members of the public.

14. Respondent thereby engaged in the unauthorized practice of law.

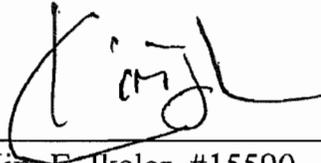
15. Respondent does not fall within any of the case law or statutory exceptions.

WHEREFORE, the Petitioner prays that this Court issue an order directing Respondent to show cause why Respondent should not be enjoined from engaging in any unauthorized practice of law; thereafter that the Court enjoin 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 Respondent should be enjoined from the unauthorized practice of law. Furthermore, Petitioner requests that the Court assess the costs and expenses of these proceedings against Respondent; impose a fine for each incident of

unauthorized practice of law, not less than \$250.00 and not more than \$1,000.00;  
order Respondent to pay restitution to her customers; and any other relief deemed  
appropriate by this Court.

DATED this 6<sup>th</sup> of September, 2015.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kim E. Ikeler", written over a horizontal line.

Kim E. Ikeler, #15590  
Assistant Regulation Counsel  
Attorney for Petitioner