

SUPREME COURT, STATE OF COLORADO TWO EAST 14 <sup>TH</sup> AVENUE DENVER, COLORADO 80203  ORIGINAL PROCEEDING IN UNAUTHORIZED PRACTICE OF LAW	CASE NO. 03SA370
<b>Petitioner:</b>  THE PEOPLE OF THE STATE OF COLORADO,  v.  <b>Respondent:</b>  CARMINA WARREN and DIVORCE TECH, INC.	<b>RECEIVED</b>  APR 12 2004  REGULATION COUNSEL  <i>JC</i> <i>4/13</i>
<b>ORDER OF INJUNCTION</b>	

Upon consideration of the Petition for Injunction, the Order to Show Cause and the Proof of Service, and now being sufficiently advised in the premises,

IT IS ORDERED that the Respondent CARMINA WARREN and DIVORCE TECH, INC. shall be, and the same hereby are ENJOINED from further engaging in the unauthorized practice of law.

BY THE COURT, APRIL 12, 2004.

Copies mailed via the State's Mail Services Division on 04/12/04 HOP

James Coyle  
 Deputy Regulation Counsel

Carmina Warren &  
 Divorce Tech, Inc.  
 2108½ N. Portland Ave.  
 Oklahoma City, OK 73107



DEC 11 2003  
COURT USE ONLY

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:  
CARMINA WARREN and DIVORCE TECH, INC.

James C. Coyle # 14970  
Deputy Regulation Counsel  
Attorney for Petitioner  
600 17<sup>th</sup> Street, Suite 200-South  
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▲ COURT USE ONLY ▲

Case Number: 03UPL017

**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 respondents to show cause why they should not be enjoined from the unauthorized practice of law. As grounds therefor, counsel states as follows:

1. The respondents, Carmina Warren and Divorce Tech, Inc. ("Divorce Tech"), and their employees at Divorce Tech, are not licensed to practice law in the state of Colorado. Upon information and belief, the respondents and their employees are not licensed to practice law in any other state within the United States. The respondents' last known business address is 2108 1/2 North Portland Avenue, Oklahoma City, Oklahoma 73107.

2. Upon information and belief, the respondent Carmina Warren was the incorporator and sole shareholder of Divorce Tech, Inc. Divorce Tech, Inc. was qualified as a corporate entity in the state of Oklahoma on September 27,

2002. That corporate status was suspended on March 19, 2003, and remains under suspension in Oklahoma as of the filing of this petition. Divorce Tech is not incorporated in Colorado.

3. From February 2003, the respondents have placed an ad in the The Nickel Want Ads in Grand Junction, Colorado, stating as follows:

DIVORCE  
\$175 - \$275  
Covers children, etc. Only  
one signature required!  
Excludes government fees!  
Call (800) 462-2000 ext. 111  
(8:00 am - 8:00 pm)  
DIVORCE TECH

Divorce Tech also advertises its services in other states.

4. Employees at Divorce Tech hold themselves out as “Divorce Specialists”. When a person calls requesting an uncontested divorce, employees “go over a script” with that individual and then mail a questionnaire to be filled out by the prospective client. Divorce Tech then selects, prepares and processes the pleadings. A Divorce Tech employee has informed an investigator with the Office of Attorney Regulation Counsel that “the divorce is guaranteed that a judge will sign off.”

5. Divorce Tech charges a flat fee of “\$175 for an annulment if the client has been married for less than thirty (30) days and \$275 for a divorce if the client has been married over thirty (30) days.” Employees of Divorce Tech state that filing fees range from \$100 to \$150 and are based on income. If the client’s income is low enough, Divorce Tech employees state that Divorce Tech can get the fee waived.

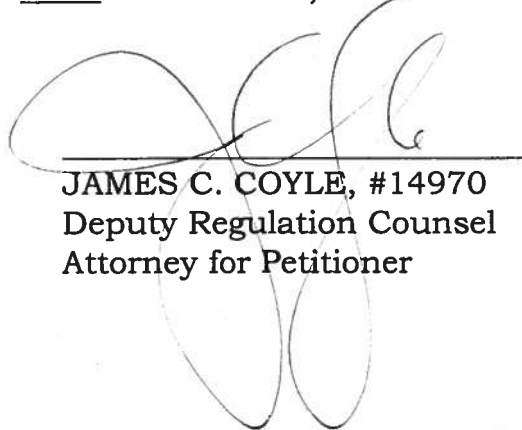
6. Divorce Tech’s advertisements provide incorrect legal information when the advertisements claim that “[o]nly one signature [is] required.” Employees also provided incorrect information on annulments, divorces, and the basis for the dollar amounts of filing fees in Colorado.

7. By holding themselves out to be “divorce specialists,” by advertising to provide legal services in divorce and annulment matters, and by selecting and preparing legal pleadings on behalf of others, the respondents have 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 respondents do not fall within any of the statutory or case law exceptions.

WHEREFORE, the petitioner prays that this court issue an order directing the respondents, Carmina Warren and Divorce Tech, Inc., to show cause why the respondents should not be enjoined from engaging in any unauthorized practice of law; thereafter that the court enjoin these respondents 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 these respondents 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 these respondents, jointly and severally, order the refund of any and all fees paid by Colorado clients to the respondents; and assess restitution against the respondents for losses incurred by clients or third parties as a result of the respondents' conduct; and any other relief deemed appropriate by this court.

Respectfully submitted this 11<sup>th</sup> of December, 2003.



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