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Colorado Supreme Court  
Attorney Regulation Counsel  
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Denver, CO 80202

**RE: Atty. Reg. # 24060, Madeline Wilson (f/k/a “Madeline Hollis”)**

**Count I - Interference with Proceedings in Texas in an Effort to Obstruct  
the Administration of Justice <sup>1</sup>**

1. Last year (2006), I retained Dallas attorney, Thomas J. O’Brien (Tex. atty. reg. # 784691) to represent me in a custody and damages suit in Texas against my ex wife, who has been secreting my child from me in Texas in violation of applicable Colorado court orders and the laws of both Texas and Colorado. I filed suit in April of this year.

2. At the first preliminary hearing on May 2<sup>nd</sup>, both my attorney and I were courteously greeted by five deputies upon our arrival at the Wise County Combined courthouse and subjected to an unusual search.<sup>2</sup> Mr. O’Brien then learned from opposing counsel, Marilyn Belew (Tex. atty. reg. No. 795744) that Madeline Wilson, the respondent attorney, had contacted court security (Wise County, Texas Sheriff) from Denver and fraudulently advised them that I am dangerous in an attempt to bias that court against me and to create an impossibility of a fair trial.

3. At the first preliminary hearing in May of this year, Mr. O’Brien also learned from opposing counsel (Ms. Belew) that Madeline Wilson had applied for an *ex parte* contempt citation against me in Colorado, using her former client’s Colorado marital dissolution proceeding (filed in Dec. 1999) to enforce a personal stipulation-provision between me and Wilson (not Wilson’s client). Wilson submitted her Motion immediately upon learning of the Texas hearing date and with the intent of using the Texas proceedings (strictly concerning the custody of a minor child) as an opportunity to

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<sup>1</sup> “[A] lawyer should seek improvement of the law, access to the legal system, the administration of justice.” N<sup>o</sup> 6, *PREAMBLE: A LAWYER’S RESPONSIBILITIES*

<sup>2</sup> Ordinarily, “there are two deputies assigned to the Wise County courthouse. These deputies act as bailiffs for their assigned courtroom and provide security for the courthouse.” <http://www.sheriff.co.wise.tx.us/court.htm> (last visited July 17, 2007)

have me served with her personal vexatious Colorado litigation.<sup>3</sup> Although an attorney-advocate, “has a duty to use legal procedure for the fullest benefit of the client’s cause,” she, “also [has] a duty not to abuse legal procedure,” for her own personal gain. Cmt. 1 to Rule 3.1.

4. My attorney also learned from opposing counsel that, because Wilson was unable to obtain the contempt citation, she asked Ms. Belew to use the Texas proceedings to put me on the stand to obtain my residential address for the sole purpose of providing it to Ms. Wilson, so that she could serve me with her future personal, vexatious and duplicative litigation.

5. I have also learned from my attorney, Tom O’Brien, that Wilson has been contacting O’Brien’s brother. (Wilson attended St. Mary’s Law School with O’Brien’s brother). Wilson solicited my attorney’s brother to influence my attorney to abandon the case.

6. Under Rule 8.4(d), it is professional misconduct for an attorney to, “engage in conduct that is prejudicial to the administration of justice.” The above-enumerated actions, which include using the legal system for personal vendettas and attempting to introduce information that is unfairly prejudicial through means extrinsic to the proceedings and, which are not subject to admissibility standards, constitutes gross misconduct on the part of an attorney and brings disrepute to the legal profession. Moreover, the Texas proceeding, styled, “*In the Interest of Shelby Harrington, a Minor Child*,” is not an appropriate forum or venue for Wilson to pursue her personal vendettas. “A lawyer should use the law’s procedures only for legitimate purposes and not to harass or intimidate others.” N<sup>o</sup> 5, *PREAMBLE: A LAWYER’S RESPONSIBILITIES*.

### **Count II – Candor Towards the Tribunal / Meritorious Claims and Contentions / Expediting Litigation**

7. “An advocate is responsible for pleadings and other documents prepared for litigation, but is usually not required to have personal knowledge of matters asserted therein, for litigation documents ordinarily present assertions by the client, or by someone on the client’s behalf, and not

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<sup>3</sup> I have not lived in Colorado since December of 2000, and Ms. Wilson does not know where I live (which is my intent, to prevent her from continuing to abuse process to harass me and my family). Wilson has applied for two restraining orders while I lived in Colorado (one denied; one vacated) and has applied for an additional three in the six years that I have lived outside of Colorado (all denied or abandoned).

assertions by the lawyer.” Cmt 3 to Rule 3.3. In this matter, however, Madeline Wilson has been a complaining witness for the last seven ½ years.<sup>4</sup>

8. “Dilatory practices bring the administration of justice into disrepute.” Cmt. 1 to Rule 3.2. On July 3<sup>rd</sup> 2007 –four months after I filed my case in Texas –Wilson filed a Verified Motion on behalf of her client in the First Judicial District.<sup>5</sup> The Motion, supported by Affidavit, contained claims that both Wilson and her client knew or reasonably should have known, were false. “The obligation prescribed in Rule 1.2(d) not to counsel a client to commit or assist the client in committing a fraud applies in litigation.” *Ibid*.

a. In ¶ 5 of the Motion, Ryan and Wilson falsely alleged that I have represented that I am a Colorado resident. However, both Wilson and her client were defendants in civil action 05-cv-01858 (D. Colo.), where Wilson argued, in her November 30, 2005 Motion to Dismiss, that “Plaintiff is a nonresident of the State of Colorado.” Further, in my Second Amended Complaint, served on both parties on December 21, 2005, I stated, “Father is not now and has not been a legal resident of Colorado at any time since January of 2001. . . Defendant Ryan is now domiciled in Texas.” *Id.* ¶ 20.

b. Ryan and Wilson allege in the Motion that I’ve threatened to kidnap my daughter (who they’ve already unlawfully abducted from me for the last four years). This false statement is exactly as true as Wilson’s allegation that I have threatened to kill Judge Jane Tidball; that I have “a history of carrying guns and knives;” that I have a “cache of weapons,” that I have brandished [a] gun[s] at people in or at a carwash; that I am “potentially homicidal,” or that I am mentally ill, among other things.

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<sup>4</sup> See, e.g., in *Marriage of Harrington*, JeffCo N<sup>o</sup> 99DR3717, Exhibits A1 through A4 attached to my August 13, 2003 Motion (admissible evidence that Wilson personally intervened in my mental health care in July and August of 2000 through harassing, harassing and frequent faxes, phone calls and one personal trip to the facility to speak with my care providers). Also, in Jefferson County Case N<sup>o</sup> 01CV1376, the court noted in a March 21, 2002 Order, “Based on contact by Defendants Ryan and Wilson with the Jefferson County Attorney’s Office, Assistant County Attorney John Thirkell contacted Jefferson Center for Mental Health [Christy Ryan’s employer] to have them do a mental health evaluation [of Mr. Harrington] pursuant to a court order issued by this Division of the Court in case No 00MH243.” [underline emphasis added]. Wilson also joined her own personal adversarial case (County Court N<sup>o</sup> 00C08748 (*Wilson v. Harrington*)) with her client’s marital dissolution case, *Marriage of Harrington*. See 8/14/2000 entry, Register of Actions.

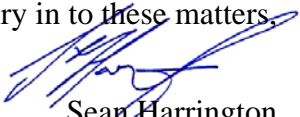
<sup>5</sup> This July 3<sup>rd</sup> 2007 pleading is available online at: <http://www.knowyourcourts.com/Harrington/99DR3717.htm>

c. In ¶ 18 of their Motion, Wilson alleges that mother (actually Wilson) filed a contempt citation regarding my alleged non-compliance with some court order.<sup>6</sup> The Motion for Contempt (which I have not been served with) was assigned to Division P of the First Judicial District Court. Wilson claims that the alleged contempt citation has been signed. *Id.* However, I contacted the “domestic” line of the combined court at 303-271-6149 and also the division clerk of Division P as recently as July 18; both have indicated that her Contempt Motion has not been ruled on. If so, Wilson has misrepresented a material fact.

9. In the July 3<sup>rd</sup> pleading, Wilson misrepresented the law. She relied upon and quoted language directly from the UCCJA of 1967 as the primary authority for the untimely relief that she sought. However, the UCCJA of 1967 was **repealed** and replaced with the UCCJEA of 1997. *See In the Interest of A.J.C.*, 88 P.3d 599 (Colo. 2004) (“Colorado has adopted the Uniform Child Custody Jurisdiction and Enforcement Act, Colo. Rev. Stat. §§ 14-13-101 *et seq.*, instead of the UCCJA”). “Legal argument based on a knowingly false representation of law constitutes dishonesty toward the tribunal. A lawyer is not required to make a disinterested exposition of the law, but must recognize the existence of pertinent legal authorities.” Cmt. 4 to Rule 3.3.

10. In light of the fact that that the Texas judge had already assumed jurisdiction over the cause and in light of the fact that I have not lived in Colorado since Dec. 2000; mother has not lived in Colorado since Dec. of 2004 (her flight aided and abetted by Madeline Wilson); and my daughter has been secreted in Texas since Dec. of 2004 (her concealment furthered by Madeline Wilson), this latest pleading in Colorado (requesting the Colorado court to exercise jurisdiction over parties, who haven’t lived in the state for several years) is not, only absurd and disrespectful of the truth, but it is also a deliberate attempt to subvert the administration of justice through dilatoriness and confusion. Moreover, it is an affront to the authority of the Texas court and undermines the purpose of avoiding concurrent jurisdiction, as intended with the UCCJEA and the Parental Kidnapping Prevention Act (PKPA).

Please open an inquiry in to these matters.



Sean Harrington

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<sup>6</sup> This is unrelated to any claims asserted by Wilson’s client and, instead, relates to a personal, stipulated provision between myself and Wilson.