

Christopher Gregory

From: Christopher Gregory
Sent: Sunday, May 18, 2025 3:50 PM
To: iecinfo@state.co.us
Subject: IEC Case No. 25-31--Supplemental Information
Attachments: 250516 JP Press Release GardnerB Appt CCJD.pdf

Dear Mr. Ioannides,

Per our prior correspondence, I understand that the Independent Ethics Commission will take up my complaint as to Governor Jared Polis. Since my last email to you, however, there has been another significant factual development that impacts consideration of the complaint. On Friday, May 16, 2025, Governor Polis issued a press release confirming his appointment of former Senator Bob Gardner to the Colorado Commission on Judicial Discipline (CCJD) in place of Governor Polis's previously rejected reappointment of Mindy Sooter. During the legislative reforms of the judicial discipline system that occurred from 2022-23, Senator Gardner distinguished himself as being receptive to lobbying by the Justices of the Colorado Supreme Court and the Colorado Judicial Department. The effect of this lobbying was to blunt some of the principal reforms sought by the CCJD, including removing the Justices' powers to appoint members of the CCJD. The circumstances of Senator Gardner's positions are examined at length in the anonymous October 20, 2024 request for evaluation (RFE) of judicial conduct that accompanies my complaint. In addition, Senator Gardner is responsible for the Legislature's failure to stand up the Office of the Judicial Discipline Ombudsman. Brian Eason, *Colorado Lawmakers Funded an Office to Handle Complaints Against Judges. No One Set It Up.*, COLORADO SUN, March 13, 2025. Governor Polis's appointment of Senator Gardner is yet further circumstantial evidence of the Governor's coordination of his appointments with the Justices and his knowing participation in retaliation against me as a whistleblower otherwise protected by Colorado law.

Please supplement my complaint with these new facts.

Warmest regards,

Christopher Gregory



The Gregory Law Firm, LLC

Christopher S.P. Gregory
Attorney at Law

201 Coffman St., #1822, Longmont, CO 80502

● Phone: 970.648.0642 ● Fax: 970.648.0643 ●

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COLORADO

Governor Jared Polis



Gov. Polis Announces Boards and Commissions Appointments

FRIDAY, MAY 16, 2025

Air Quality Control Commission

The Commission develops and maintains a comprehensive program for the prevention and control of air pollution in Colorado. The major goal of this program is to meet national ambient air quality standards.

for a term expiring January 31, 2026:

- Daniel Blankenship of Fountain, Colorado, to serve as a member with industrial and private sector experience, occasioned by a resignation.

Commission on Judicial Discipline

The Colorado Commission on Judicial Discipline investigates complaints of judicial misconduct.

Following the passage of Amendment H, the Commission now serves as the independent investigative

and prosecutorial body for judicial discipline matters, with adjudication handled separately by the newly established Adjudicative Board.

effective July 1, 2025 for a term expiring June 30, 2029:

- Robert Gardner, of Colorado Springs, Colorado, to serve as an attorney, appointed.

Charter School Institute Board

The mission of the Institute Board shall be to foster high-quality public school choices offered through institute charter schools, including particularly schools for at-risk students.

effective July 2, 2025 for terms expiring July 1, 2028:

- Liz Howell of Grand Junction, Colorado, to serve as a parent whose child is attending an institute charter school, appointed;
- Andrew Karow of Carbondale, Colorado, to serve as a member with board experience with other boards or public service experience, reappointed.

Child Protection Ombudsman

The Child Protection Ombudsman Board oversees decisions related to the Office of the Child Protection Ombudsman, including personnel decisions, accountability and consistency in operating policies and procedures, and fiscal oversight of the general operating budget.

for a term expiring August 1, 2025:

- Matthew Tulley of Monte Vista, Colorado, to serve as an individual with previous professional experience with a rural county human or social services agency or a rural private child welfare advocacy agency, occasioned by a resignation, appointed.

for a term expiring August 1, 2027:

Contact Governor Polis

State Capitol Bldg - 200 E. Colfax Ave., Rm. 136, Denver, CO 80203

Constituent Services Help Line: (303) 866-2885

Governor's Office, Front Desk: (303) 866-2471

NEWSLETTER SIGNUP



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Christopher Gregory

From: Christopher Gregory
Sent: Tuesday, May 20, 2025 10:06 AM
To: Indep. Ethics Comm'n
Subject: RE: IEC Complaint No. 25-31--Disqualification of General Counsel Gina Cannan

Mr. Ioannides,

Thanks for confirming.

Warmest regards,
Christopher Gregory



The Gregory Law Firm, LLC

Christopher S.P. Gregory
Attorney at Law

201 Coffman St., #1822, Longmont, CO 80502

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From: Indep. Ethics Comm'n <iecinfo@state.co.us>
Sent: Tuesday, May 20, 2025 10:03 AM
To: Christopher Gregory <cspgregory@thegregorylawfirm.net>
Subject: Re: IEC Complaint No. 25-31--Disqualification of General Counsel Gina Cannan

She already plans to announce her recusal. She will not participate in your complaint discussion at all.

Dino Ioannides
Executive Director
Colorado Independent Ethics Commission
1300 Broadway, Suite 240, Denver, CO 80203
iecinfo@state.co.us | (720) 625-5697 | iec.colorado.gov

On Tue, May 20, 2025 at 9:59 AM Christopher Gregory <cspgregory@thegregorylawfirm.net> wrote:

Dear Mr. Ioannides,

In order to ensure the fair and impartial consideration of my complaint and any subsequent proceedings, I feel that it is necessary to raise a conflict of interest as to Gina Cannan (who I assume is still serving as the IEC's general counsel appointed through the Colorado Attorney General's Office). Beyond broader conflicts of interest that exist through the involvement of the Attorney General's Office in the misconduct alleged in my complaint against Governor Jared Polis, Ms. Cannan directly participated in the CCJD Commissioners' retaliation against me for engaging in protected whistleblower activities (specifically my internal reporting of misconduct related to the Masias Controversy and the concealment of Judge D. Brett Woods's habitual alcohol abuse and retaliation against court staff). Ms. Cannan should be disqualified and should not provide any advice to the IEC with regards to my complaint. Ideally a conflict-free special assistant attorney general from outside the Attorney General's Office can be appointed as a substitute for Ms. Cannan. Although these issues may have already been addressed by the IEC, I wanted to bring them to your attention, nevertheless.

Thank you again for your assistance with this process. Please let me know the outcome of today's meeting. Do not hesitate to contact me if you need any additional information or have any questions.

Warmest regards,

Christopher Gregory



The Gregory Law Firm, LLC

Christopher S.P. Gregory

Attorney at Law

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Christopher Gregory

From: Indep. Ethics Comm'n <iecinfo@state.co.us>
Sent: Wednesday, May 28, 2025 9:11 AM
To: Christopher Gregory
Subject: Re: Disposition of Complaint 25-31

Mr. Gregory,

As you know, due to the confidentiality requirements imposed by the Colorado Constitution, the IEC always considers new complaints in closed, executive session. I wish I could tell you more about the IEC's reasoning in your case, but I am unable to disclose the deliberations that occur in any of the IEC's closed sessions. I am sure this comes as a disappointment, but I am restricted from making additional comment.

Regards,

Dino Ioannides
Executive Director
Colorado Independent Ethics Commission
1300 Broadway, Suite 240, Denver, CO 80203
iecinfo@state.co.us | (720) 625-5697 | iec.colorado.gov

On Tue, May 27, 2025 at 3:24 PM Christopher Gregory <cspgregory@thegregorylawfirm.net> wrote:

Dear Mr. Ioannides,

Thank you for informing me of the IEC's disposition of this Complaint. Because the IEC's jurisdiction is broadly defined to include "any other standards of conduct and reporting requirements as provided by law," Colo. Const. Art. XXIX, Sec. (5)(1), I do not understand the basis for the IEC's dismissal. Per the IEC's Ethics Handbook (3rd ed. 20216), conflicts of interest and appearances of impropriety should provide sufficient grounds for a complaint to meet the threshold for the IEC's jurisdiction. Likewise, verifiable retaliation by an appointing authority as prohibited by the Colorado Whistleblower Protection Act, the Colorado False Claims Act, and other Colorado laws should meet the jurisdictional threshold. The IEC otherwise has personal jurisdiction over Governor Jared Polis. Such matters go to the IEC's core purpose of enforcing ethical standards within Colorado State Government.

If you could provide a more detailed explanation of the grounds for the IEC's jurisdictional determination, I would greatly appreciate it.

Warmest regards,

Christopher Gregory



The Gregory Law Firm, LLC

Christopher S.P. Gregory

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From: Indep. Ethics Comm'n <iecinfo@state.co.us>
Sent: Tuesday, May 27, 2025 2:56 PM
To: Christopher Gregory <cspgregory@thegregorylawfirm.net>
Subject: Disposition of Complaint 25-31

Mr. Gregory,

Please see the attached correspondence, which describes the disposition of Complaint 25-31.

Thank you,

Dino Ioannides

Executive Director

Colorado Independent Ethics Commission

1300 Broadway, Suite 240, Denver, CO 80203

iecinfo@state.co.us | [\(720\) 625-5697](tel:(720)625-5697) | iec.colorado.gov