

STATE OF COLORADO OFFICE OF ADMINISTRATIVE COURTS 1525 Sherman Street, 4th floor Denver, Colorado 80203	<b>▲ COURT USE ONLY ▲</b>
BEFORE THE SECRETARY OF STATE, COLORADO DEPARTMENT OF STATE, in re ED 2022-94, 2022-98  ELECTIONS DIVISION OF THE SECRETARY OF STATE,  Complainant,  vs.  FOOTHILLS FIRE PROTECTION DISTRICT, DUEY FREEMAN PAUL DEETH SCOTT FERGUSON STEVE BECK TJ CARNEY, and ALAN ANDERSON  Respondents.	
<i>Attorneys for Respondent Foothills Fire Protection  District</i> Dylan Woods, Atty. #46731 Coaty and Woods, P.C. 1202 Bergen Parkway, Suite 110 Evergreen, CO 80439 Phone: 303-674-0800 Fax: 303-674-8492 <a href="mailto:dwoods@evergreenco.law">dwoods@evergreenco.law</a>	Case Number: AHO 2023-009  Div.:
<b>FOURTH MOTION TO WITHDRAW</b>	

Comes now, Dylan Woods, and the law firm of Coaty and Woods, P.C., undersigned attorneys for the Respondent, Foothills Fire Protection District, in the within action, and moves the Hearing Officer for an Order authorizing withdrawal as counsel.

**C.R.C.P. Rule 121:** Undersigned Counsel for Respondent conferred with Complainant’s Counsel, who does not object to the relief requested in this Motion. All other parties have been informed of the intent to withdraw and no objection has been communicated

by any party.

AS GROUNDS FOR THIS MOTION, counsel states as follows:

1. Client has terminated the attorney-client relationship and requested to proceed without representation of this firm. Counsel gave actual notice to the client prior to filing this Motion by email to Stephanie Graf, President of the Board and Rod Cameron, Fire Chief, on April 19, 2024.
2. Such withdrawal will not have a material adverse effect on the interests of the client.
3. Any written orders submitted and entered by the court directing action of the withdrawing attorney have been complied with by the withdrawing attorneys.
4. Respondent and all other parties of record have been given written notification of counsel's intent to withdraw from this matter, as evidenced by the prior motions and by emails to the Fire Chief and Board President. The following advisements have been provided to the District by email to the Fire Chief and Board President. All other respondents have been informed of the intent to withdraw and of the District's obligations by email.

#### **ADVISEMENTS TO CLIENT**

1. The Court will retain jurisdiction over the parties and subject matter of this action.
2. The District will have the burden of keeping the Hearing Officer and other parties informed where notices, pleadings, or other papers may be served upon it.
3. If the District fails or refuses to comply with all court rules and orders, it may suffer possible dismissal, default or other sanctions.
4. The dates of any proceedings, including trial which dates will not be delayed nor proceeding affected by the withdrawal of counsel are as follows:

- I. Each of the Respondents is ordered to file an Answer to the July 21, 2023 Administrative Complaint on or before May 17, 2024.
- II. All discovery shall be completed by June 14, 2024.
- III. Prehearing Statements in accordance with CPF Rule 24.11, 8 CCR 1505-6, shall be filed no later than 5:00 PM Friday, July 12, 2024.

5. Respondent's last known address and telephone number are:

28812 Rainbow Hill Road  
Evergreen, CO 80439

303-526-0707

The point person for this matter will be Stephane Graf, Board President, whose email address is [stephaniegraf.ffpd@gmail.com](mailto:stephaniegraf.ffpd@gmail.com). The District may also be contacted through its Fire Chief at [rodcameron@foothillsfire.org](mailto:rodcameron@foothillsfire.org).

6. The Hearing Officer has determined that he need not wait fourteen days after a compliant Motion is served and filed, because it is apparent that Complainant is not objecting to the intended withdrawal of counsel.
7. If the motion is granted, the undersigned will promptly notify the client and the other parties of the effective date of the withdrawal.

Respectfully resubmitted this 14<sup>th</sup> day of May, 2024.

COATY and WOODS, P.C.



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Dylan Woods  
Attorney for Respondent  
Foothills Fire Protection District

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of the foregoing to the following this 14<sup>th</sup> day of May, 2024 pursuant to C.R.C.P. 5(b)(2)(D).

Duey Freeman at <a href="mailto:dueyfreeman@gmail.com">dueyfreeman@gmail.com</a> <i>Respondent</i>	Paul Deeth at <a href="mailto:pdeeth@comcast.net">pdeeth@comcast.net</a> <i>Respondent</i>
Scott Ferguson at <a href="mailto:Molyminer88@gmail.com">Molyminer88@gmail.com</a> <a href="mailto:Sferguson.ffr@gmail.com">Sferguson.ffr@gmail.com</a> <i>Respondent</i>	Steve Beck at <a href="mailto:lravenquest@gmail.com">lravenquest@gmail.com</a> <a href="mailto:sbeckffpd@gmail.com">sbeckffpd@gmail.com</a> <i>Respondent</i>
TJ Carney at <a href="mailto:tjffpd@carneylaw.net">tjffpd@carneylaw.net</a> <i>Respondent</i>	Alan Anderson at <a href="mailto:aanderson@hfpdco.org">aanderson@hfpdco.org</a> <a href="mailto:traumahawk232@gmail.com">traumahawk232@gmail.com</a> <i>Respondent</i>
Robert Heine at 424 Vista Avenue Golden, Colorado 80401 <a href="mailto:rmheine1@msn.com">rmheine1@msn.com</a> <i>Third-Party Complainant</i>	Pati Stajcar at 218 Dekker Dr. Golden, CO 80401 <a href="mailto:p@stajcar.com">p@stajcar.com</a> <i>Third-Party Complainant</i>
PETER G. BAUMANN Senior Assistant Attorney General at Assistant Attorney General Ralph L. Carr Colorado Judicial Center 1300 Broadway, 6th Floor Denver, Colorado 80203 <a href="mailto:peter.baumann@coag.gov">peter.baumann@coag.gov</a> Elections Division Counsel	Administrative Staff Colorado Secretary of State <a href="mailto:AdministrativeHearingOfficer@ColoradoSOS.gov">AdministrativeHearingOfficer@ColoradoSOS.gov</a>
Foothills Fire Protection District President of Board: <a href="mailto:stephaniegraf.ffpd@gmail.com">stephaniegraf.ffpd@gmail.com</a>	Foothills Fire Protection District Chief: <a href="mailto:rodcameron@foothillsfire.org">rodcameron@foothillsfire.org</a>



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Dylan Woods  
Attorney for Respondent  
Foothills Fire Protection District