

CAUSE NO. 312,721-B

|                                     |   |                                |
|-------------------------------------|---|--------------------------------|
| COMMISSION FOR LAWYER<br>DISCIPLINE | § | IN THE DISTRICT COURT OF       |
|                                     | § |                                |
| V.                                  | § |                                |
|                                     | § | BELL COUNTY, TEXAS             |
|                                     | § |                                |
| RICHARD LEE KING                    | § |                                |
| 201806819                           | § | <u>146th</u> JUDICIAL DISTRICT |

**DISCIPLINARY PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Petitioner, the Commission for Lawyer Discipline, a committee of the State Bar of Texas (hereinafter called "Petitioner"), complaining of Respondent, Richard Lee King, State Bar Card No. 50511715 (hereinafter called "Respondent"), showing the Court:

**I.**

Pursuant to Rule 190.1, Texas Rules of Civil Procedure, discovery in this case is governed by Discovery Control Plan -- Level 2, as provided in Rule 190.3, Texas Rules of Civil Procedure.

**II.**

Petitioner brings this disciplinary action pursuant to the State Bar Act, Tex. Gov't. Code Ann. §81.001, et seq. (Vernon 1998), the Texas Disciplinary Rules of Professional Conduct and the Texas Rules of Disciplinary Procedure. The complaint which forms the basis of this Disciplinary Petition was filed on or about October 25, 2018.

**III.**

Respondent is an attorney licensed to practice law in Texas and a member of the State Bar of Texas. Respondent has his principal place of practice in Bell County, Texas. Respondent may be served with process at 100 W. Central Texas Expressway, Ste. 310, Harker Heights, Texas 76548.

#### IV.

Complainant, Kimberlyn Engram, was the pro se respondent in a Motion to Enforce by Contempt, filed on August 30, 2018, in Bell County, Texas, by Respondent, Richard Lee King, on behalf of his client, Johnathen Engram who is Complainant's ex-husband. On or about October 23, 2018, Respondent initiated communication with Complainant by email in which he stated that Complainant should call him about the pending motion. The following day, Complainant called Respondent with the hope that they could resolve the matter by agreement. When Complainant did not agree with Respondent's demands, Respondent raised his voice, called Complainant an idiot, threatened to ruin Complainant's credit, and further threatened to have a warrant issued for her arrest. Complainant stated that she would no longer speak with Respondent and suggested they should let the Judge resolve the matter. Complainant ended the call. Nevertheless, Respondent called Complainant only a few minutes later. Respondent delivered a voice message with further demands and warnings.

Subsequently, Respondent continued to contact Complainant by sending a text to her mobile phone. Complainant responded, "Sir please do not contact me with your intimidation tactics anymore." Respondent sent multiple further text communications including the following statements: "If you report me to the State Bar all that will happen is that you will get laughed at." "I wouldn't expect any help from the Judge if I were you." "... you will have no credibility with the court." "You are lying..." "The judge is not going to be happy with you." "... it is likely to cost you big time." "You will be paying your Attorney and my Attorney's fees."

Complainant sent a text to Respondent that stated, "Stop contacting me." Respondent replied, "No" and continued to communicate with Complainant.

V.

By his conduct as alleged in paragraph IV, Respondent has violated the following Texas Disciplinary Rules of Professional Conduct for which he should be disciplined pursuant to Rule 3.09 of the Texas Rules of Disciplinary Procedure.

Rule 4.04(a) In representing a client, a lawyer shall not use means that have no substantial purpose other than to embarrass, delay, or burden a third person, or use methods of obtaining evidence that violate the legal rights of such a person.

VI.

The complaint which forms the basis of the Cause of Action set forth above was brought to the attention of the Office of the Chief Disciplinary Counsel of the State Bar of Texas by the State Bar of Texas filing a complaint against Respondent on or about October 25, 2018.

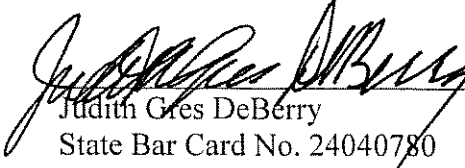
**PRAYER**

WHEREFORE, PREMISES CONSIDERED, Petitioner prays for judgment that Respondent be disciplined as the facts shall warrant and that Petitioner have such other and further relief to which entitled, including costs of court and attorney's fees.

Respectfully submitted,

**Seana Willing**  
Chief Disciplinary Counsel

**Judith Gres DeBerry**  
Assistant Disciplinary Counsel  
Office of the Chief Disciplinary Counsel  
STATE BAR OF TEXAS  
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Judith Gres DeBerry  
State Bar Card No. 24040780

Attorneys for Petitioner

**ORDER OF THE SUPREME COURT OF TEXAS**

**Misc. Docket No. 19-9088**

Appointment of a District Judge to Preside  
in a State Bar Disciplinary Action

The Supreme Court of Texas hereby appoints the Honorable Cheryl Lee Shannon, Judge of the 305th District Court, Dallas County, Texas, to preside in the Disciplinary Action styled:

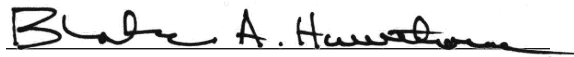
***Commission for Lawyer Discipline v. Richard Lee King (SBOT# 201806819)***

to be filed in a District Court of Bell County, Texas.

The Chief Disciplinary Counsel shall promptly forward to the District Clerk of Bell County, Texas, a copy of the Disciplinary Petition and this Order for filing pursuant to Rule 3.03, Texas Rules of Disciplinary Procedure.

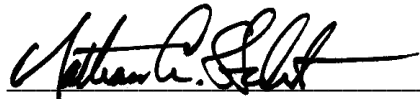
As ordered by the Supreme Court of Texas, in chambers,

With the Seal thereof affixed at the City of  
Austin, this 27<sup>th</sup> day of September, 2019.

  
BLAKE A. HAWTHORNE, CLERK  
SUPREME COURT OF TEXAS

This assignment, made by Misc. Docket No. 19-9088, is also an assignment by the Chief Justice of the Supreme Court of Texas pursuant to Texas Government Code § 74.057.

Signed this 27th day of September, 2019.

A handwritten signature in black ink, appearing to read "Nathan L. Hecht", written over a horizontal line.

Nathan L. Hecht  
Chief Justice