

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

KIMBERLY J. IRELAND,)
21600 W. 100th Terrace)
Lenexa, Kansas 66220)
)
Plaintiff,)
)
v.)
)
KEVIN P. MORIARTY, Individually,)
Serve:)
Johnson County District Court)
Division 14)
100 N. Kansas)
Olathe, Kansas 66061)
)
and)
)
JOHNSON COUNTY, KANSAS)
BOARD OF COMMISSIONERS,)
Serve:)
111 S. Cherry Street, Suite 3300)
Olathe, Kansas 66061)
)
and)
)
DOES I – XX.)
)
Defendants.)

Case No. 09-CV-2506 JWL/JPO

COMPLAINT AND DEMAND FOR JURY TRIAL

COME NOW Plaintiff Kimberly J. Ireland, *pro se*, and for her Complaint and Demand for Jury Trial against Defendants Kevin P. Moriarty and Johnson County, Kansas, alleges and states as follows:

PARTIES

1. Kimberly J. Ireland is a citizen and resident of the State of Kansas residing at 21600 W. 100th Terrace, Lenexa, Kansas 66220. Plaintiff was at all times herein an

attorney licensed, practicing and in good standing in the State of Kansas and the State of Missouri.

2. Kevin P. Moriarty is an individual resident of Johnson County, Kansas. Defendant Moriarty is being sued in his individual capacity. Defendant Moriarty can be served personally with process at 100 N. Kansas, Olathe, Kansas 66061.

3. Defendant Moriarty, was, at all times mentioned herein, employed as a District Court Judge in the Johnson County Courthouse with supervisory authority over his court reporter and his administrative assistant.

4. Defendant Johnson County, Kansas Board of Commissioners (hereinafter "Defendant County") is a resident of Johnson County, Kansas and it can be served personally with process at 111 S. Cherry Street, Suite 3300, Olathe, Kansas 66061.

5. That at all times relevant hereto, defendant is a person within the meaning of 42 U.S.C. § 1983.

6. Does I-XX are individuals and entities that have some actionable involvement with the allegations that are the subject of this Complaint, but are unknown to the plaintiff Ireland at this time. These individuals and entities will be added as parties as they are identified.

JURISDICTION AND VENUE

7. Jurisdiction over this claim is provided to this Court under 28 U.S.C. § 1343 and 1331. Further, this Court has jurisdiction under 28 U.S.C. § 1367 to hear plaintiff's state law claims in that all claims made herein are so related to each other that they form part of the same case or controversy under Article III of the United States Constitution.

8. The Court has jurisdiction over defendants because the unlawful acts alleged in this complaint were committed in Johnson County, Kansas, which lies in the District of Kansas. In addition, defendant has minimum contacts with the District of Kansas and the State of Kansas.

9. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, because a substantial part of the events or omissions giving rise to plaintiff's claims occurred in Johnson County, Kansas which lies within the District of Kansas, and because defendants transact business within the District of Kansas.

10. Joinder of these claims is proper because they arise out of the same transaction, occurrence, or series of transactions or occurrences and/or common questions of law or fact will arise in this action.

FACTUAL ALLEGATIONS

11. On March 19, 2007, plaintiff Ireland filed for divorce alleging incompatibility in the District Court of Johnson County, Kansas in the case captioned *Ireland v. Ireland* Case No, 07 CV 02121.

12. Johnson County District Court Judge Allen Slater was assigned as the trial judge.

13. On September 26, 2007, the plaintiff Ireland attended voluntary mediation conducted by defendant Moriarty.

14. Defendant Moriarty used profanity during the mediation. See Moriarty letter at pages 4 and 5, a true and accurate copy of the letter sent by defendant Moriarty to the Kansas Commission on Judicial Qualifications is attached hereto as **Exhibit "A"**.

15. Defendant Moriarty used the word “fuck” during the mediation. See Moriarty letter at pages 4 and 5, a true and accurate copy of the letter sent by defendant Moriarty to the Kansas Commission on Judicial Qualifications is attached hereto as **Exhibit “A”**; see Ireland Trial Transcript dated September 16, 2008 at page 88:1-4 and 87:3-16, pages 87-90 attached hereto as **Exhibit “D”**.

16. Defendant Moriarty discussed plaintiff Ireland’s female undergarments and referred to the same as “panties” during the mediation. See Moriarty letter at page 7, a true and accurate copy of the letter sent by defendant Moriarty to the Kansas Commission on Judicial Qualifications is attached hereto as **Exhibit “A”**; see Ireland Trial Transcript dated September 16, 2008 at page 88:1-4 and 89:15-25 – 90:1-8, pages 87-90 attached hereto as **Exhibit “D”**.

17. Defendant Moriarty discussed plaintiff Ireland’s sex life during the mediation. See Moriarty letter at pages 2 and 5, a true and accurate copy of the letter sent by defendant Moriarty to the Kansas Commission on Judicial Qualifications is attached hereto as **Exhibit “A”**.

18. Plaintiff Ireland’s sex life was irrelevant to the divorce matter. See Judge Slater’s interview at page 30 of the Investigative Report, a true and accurate copy of the interview section of the Investigative Report pages 28-35 is attached hereto as **Exhibit “B”**.

19. Defendant Moriarty appeared to be masturbating during the mediation. See Fact Conclusions from the Investigative Report at page 37, paragraph 8, a true and accurate copy of paragraph 8, page 37 is attached hereto as **Exhibit “C”**.

20. Plaintiff Ireland's ex-husband testified during the trial of the divorce that defendant Moriarty's behavior during the mediation may have been offensive to others. See Ireland Trial Transcript dated September 16, 2008 at page 87:3-11, pages 87-90 attached hereto as **Exhibit "D"**.

21. Most, if not all, of defendant Moriarty's inappropriate behavior during the mediation occurred while only defendant Moriarty, plaintiff Ireland and Kevin Ireland were in the room. See Ireland Trial Transcript dated September 16, 2008 at page 87:22-23, attached hereto as **Exhibit "D"**.

22. On October 1, 2007, plaintiff Ireland complained about defendant Moriarty's behavior to District Court Judge Allen Slater. A true and accurate copy of Judge Slater's handwritten notes is attached hereto as **Exhibit "E"**.

23. On October 1, 2007, Judge Slater reported defendant Moriarty's behavior to District Court Judge Thomas Foster and Chief Judge Stephen Tatum. A true and accurate copy of Judge Slater's handwritten notes is attached hereto as **Exhibit "E"**.

24. On October 3, 2007, plaintiff Ireland complained about defendant Moriarty's behavior in a written complaint to the Kansas Commission on Judicial Qualifications. A true and accurate copy of plaintiff Ireland's letter to the Kansas Commission on Judicial Qualifications is attached hereto as **Exhibit "F"**.

25. In retaliation to her October 3, 2007 complaint, defendant Moriarty contacted and discussed plaintiff Ireland with Judge Slater while Judge Slater was assigned to hear the Ireland domestic matter. See Judge Slater's interview at page 31 of the Investigative Report, a true and accurate copy of the interview section of the Investigative Report pages 28-35 is attached hereto as **Exhibit "B"**.

26. In retaliation to her October 3, 2007 complaint, defendant Moriarty initiated and conducted his own investigation into the personal and professional life of plaintiff Ireland.

27. In retaliation to her complaint, defendant Moriarty made allegations against plaintiff Ireland that were intended to influence her domestic matter.

28. In retaliation to her complaint, on or about October 5, 2007, defendant Moriarty met with plaintiff Ireland's ex-husband's attorney Edward Byrne and discussed plaintiff Ireland and the ongoing domestic matter. See Letter from Byrne to Disciplinary Administrator at pages 6 and 7, a true and accurate copy of pages 6 and 7 are attached hereto as **Exhibit "G"**. During the meeting defendant Moriarty requested that attorney Edward Byrne send a letter to the Kansas Commission on Judicial Qualifications stating that defendant Moriarty had done nothing improper. The meeting between defendant Moriarty and Edward Byrne was not part of any judicial duty or any formal ethical investigation.

29. At the request of defendant Moriarty, on or about October 23, 2007, attorney Edward Byrne sent a letter to the Kansas Commission on Judicial Qualifications discussing plaintiff Ireland and the Ireland mediation. A true and accurate copy of Edward Byrne's letter to the Kansas Commission on Judicial Qualifications is attached hereto as **Exhibit "H"**.

30. At the request of defendant Moriarty, on or about October 18, 2007, Jordan Hawkins, defendant Moriarty's Administrative Assistant, sent a letter to the Kansas Commission on Judicial Qualifications discussing plaintiff Ireland and the

Ireland mediation. A true and accurate copy of Jordan Hawkins' letter to the Kansas Commission on Judicial Qualifications is attached hereto as **Exhibit "I"**.

31. At the request of defendant Moriarty, on or about October 26, 2007, Amanda Cullen, defendant Moriarty's Court Reporter, sent a letter to the Kansas Commission on Judicial Qualifications discussing plaintiff Ireland and the Ireland mediation. A true and accurate copy of Amanda Cullen's letter to the Kansas Commission on Judicial Qualifications is attached hereto as **Exhibit "J"**.

32. On or about October 25, 2007, defendant Moriarty sent a letter ("Moriarty's letter") to the Kansas Commission on Judicial Qualifications. A true and accurate copy of the letter sent by defendant Moriarty to the Kansas Commission on Judicial Qualifications is attached hereto as **Exhibit "A"**.

33. Defendant Moriarty was the first person to make allegations concerning the sex life of plaintiff Ireland.

34. Other than defendant Moriarty, attorney Edward Byrne was the only person to make any allegations concerning the sex life of plaintiff Ireland. See Fact Conclusions from the Investigative Report at page 39, paragraph 20, a true and accurate copy of paragraph 20, page 39 is attached hereto as **Exhibit "K"**.

35. Defendant Moriarty failed to control his temper and frustrations during the mediation.

36. Although he was not acting as a judge, defendant Moriarty did not act in a patient, dignified, and courteous manner during the mediation; defendant Moriarty's conduct towards plaintiff Ireland during the mediation greatly detracted from the honor

and dignity of the judiciary; and defendant Moriarty's conduct during the mediation negatively impacted the proper administration of justice.

37. The behavior of defendant Moriarty offended and harassed plaintiff Ireland.

38. No immunity applies to the behavior of defendant Moriarty, either during or after the mediation, because his actions were taken in clear absence of all jurisdiction.

39. The behavior of defendant Moriarty during and after the mediation did not implicate the judicial decision making process.

40. Defendant Moriarty has admitted that **"at no time was I ever acting in the 'role of the Judge'"** during the Ireland mediation. A true and accurate copy of the letter sent by defendant Moriarty to the Kansas Commission on Judicial Qualifications is attached hereto as **Exhibit "A"**.

41. The Kansas Commission on Judicial Qualifications stated that "[i]t is the position of the Commission that the use of profanity by a district court judge, **whether acting as mediator or in his or her official capacity**, is inappropriate." A true and accurate copy of the letter received by defendant Moriarty from Robert Fleming is attached hereto as **Exhibit "L"**.

42. On November 15, 2007, the Kansas Commission on Judicial Qualifications filed an ethical complaint against plaintiff Ireland with the Kansas Disciplinary Administrator alleging that she had made unfounded allegations against a District Court Judge. A true and accurate copy of the letter sent by the Kansas Commission on Judicial Qualifications to plaintiff Ireland is attached hereto as **Exhibit "M"**.

43. The Kansas Commission on Judicial Qualifications did not docket or formally investigate plaintiff Ireland's complaint against defendant Moriarty.

44. On December 12, 2007, attorney Edward Byrne filed an ethical complaint with the Kansas Disciplinary Administrator against plaintiff Ireland alleging, among other things, that plaintiff Ireland had made false allegations against defendant Moriarty.

45. Upon information and belief, attorney Edward Byrne's ethical complaint was filed against plaintiff Ireland at the request of defendant Moriarty.

46. Defendant Moriarty used his authority as a District Court Judge to influence plaintiff Ireland's divorce matter.

47. Defendant Moriarty used his authority as a District Court Judge to initiate an ethical investigation into plaintiff Ireland.

48. Defendant Moriarty used his authority as a District Court Judge to request that his administrative assistant and court reporter write letters to the Kansas Commission on Judicial Qualifications falsely stating that defendant Moriarty had done nothing wrong and attacking plaintiff Ireland. True and accurate copies of the letters written by Amanda Cullen and Jordan Hawkins are attached hereto as **Exhibit's "I" and "J"**; a true and accurate copy of the interview section of the Investigative Report pages 28-35 is attached hereto as **Exhibit "B"**.

49. Defendant Moriarty served as an investigator for the Kansas Disciplinary Administrator for over fifteen (15) years.

50. Defendant Moriarty serves on the Tenth Judicial District Judicial Nominating Commission that appoints Johnson County District Court judges.

51. Defendant County was on notice of defendant Moriarty's behavior and it conducted no investigation.

52. Defendant County was on notice of defendant Moriarty's behavior and it failed to take any corrective action.

53. Defendant County was on notice of defendant Moriarty's behavior and it failed to discipline defendant Moriarty.

JOHNSON COUNTY'S HUMAN RESOURCES POLICIES

54. Johnson County, Kansas has adopted detailed policies entitled "Human Resources Policies and Procedures" ("Policies" or "Policy").

55. The Policies were in effect and applied to defendant Moriarty and others during the time relevant to this matter.

56. Policy 102 entitled "Coverage of Human Resources Policies and Procedures" establishes that the Policies apply to defendant Moriarty, and the Policy states in relevant part:

It is the policy of the Johnson County Government that the Human Resources Policies adopted by the Board of County Commissioners and any Human Resource Procedures adopted by the County Manager will apply to the fullest extent possible to all employees, including elected officials, civil service employees, appointed officials, and employees who have written employment agreements, to the extent permitted by law.

57. Policy 102-1 entitled "Human Resources Practices and Department/Agency Rules" establishes that the Policies apply to defendant Moriarty, and the Policy states in relevant part:

Any Human Resources Practices will apply to all County employees, including elected officials, appointed officials, civil service employees, and employees who may have written

employment agreements, in the same manner as the Human Resources Policies and Procedures.

58. Policy 103 entitled "Positive Employee Relations", states that the County expects all employees to:

1. Interact with the public and business associates in a professional manner;
2. Represent the County in a positive and ethical manner;
3. Perform assigned tasks in an effective and efficient manner;
4. Be punctual and work as scheduled;
5. Behave in a considerate, friendly, and constructive manner toward fellow employees; and
6. Comply with the policies adopted by the County.

59. Policy 105-1 entitled "Reporting and Investigating Allegations of Discrimination", provides in part:

B. Any employee who believes that he/she has witnessed an apparent incident or occurrence of discrimination or harassment in the workplace or arising out of County employment shall immediately report such information to the Department of Human Resources.

C. Any supervisor, manager, department/agency leader, or elected or appointed official, upon receiving a written or oral complaint, allegation or any notice whatsoever of discrimination or harassment in the workplace, or of retaliation for reporting discrimination or harassment, shall provide written notice of the complaint, allegation, or notice to the Director of Human Resources within one business day.

1. A supervisor or manager may take immediate action whenever he/she believes it is necessary to protect an employee from any further discriminatory conduct or harassment.

2. The written notice will be provided to the Director of Human Resources regardless of the supervisor or

manager's opinion of the relative merits of the claim. If the supervisor or manager has taken any action regarding the allegation, the written notice shall state what action has been taken.

3. Failure to make a written report of an allegation, complaint, or notice is in violation of this procedure and shall subject the supervisor or manager to discipline.

D. The Director of Human Resources, upon receipt of written notice from any source or upon personally receiving an oral or written complaint, allegation, or notice of workplace discrimination or harassment, will immediately open and maintain a file regarding the matter and notify appropriate legal counsel.

E. The Director of Human Resources, in conjunction with the Legal Department, shall determine whether the Department of Human Resources, the Legal Department, and/or outside counsel will conduct the investigation.

1. The person(s) assigned to conduct the administrative investigation will take statements from the complainant or alleged subject of discrimination or harassment, those persons accused of improper acts or discrimination, any witnesses, and any other persons thought to possess relevant information.

2. The investigator(s) will, at his/her sole discretion, request written and/or oral reports from any of those persons listed above, except that no complainant will be required to make a written statement if unwilling to do so.

3. When a complainant refuses to provide a written statement, the investigator(s) will utilize another method of documenting and preserving the statement.

4. All employees, including but not limited to supervisors, managers, Department/Agency Leaders, or officials, whether elected or appointed, will fully cooperate with the administrative investigation.

5. To the fullest extent reasonable, the investigator(s) shall conduct the investigation confidentially.

6. Failure to cooperate with an investigation constitutes misconduct and may result in disciplinary action, up to and including termination of employment.

F. Upon completion of the administrative investigation, the investigator(s) will submit written findings to the Director of Human Resources, who will consult with the Legal Department.

G. The Director of Human Resources shall review the written findings and recommend appropriate action to the County Manager. If no action is recommended, that shall be so noted. The recommendations may include, but are not limited to:

1. Remedial steps to be taken;
2. Training or education;
3. Managerial or supervisory changes;
4. Disciplinary action; and,
5. Referral to the Employee Assistance Program (EAP).

60. Policy 402 entitled "Behavior of Employees" states in part:

It is the policy of the Johnson County Government that certain rules and regulations regarding employee behavior are necessary for efficient business operations and for the benefit and safety of all employees. Conduct that interferes with operations, discredits the County, or is offensive to the public or coworkers will not be tolerated. Employees are expected at all times to conduct themselves in a positive and productive manner in order to promote the best interests of the County.

61. Policy 402-1 entitled "Behavior of Employees and Prohibited Conduct"

establishes certain "prohibited conduct", and in relevant part, includes:

The following conduct is prohibited and individuals engaged in it will be subject to discipline, up to and including termination of employment:

* * *

2. Engaging in any form of sexual or other harassment;

* * *

4. Discriminating against another person on the basis of his/her race, color, sex, religion or creed, age, disability, pregnancy,

ancestry or national origin, military status or membership, or service in the military;

5. Failure to report violations of County policies and procedures;

* * *

16. **Using language in a manner that offends or shocks, is intended to insult, injure or defame, or is recognized as profanity.**

* * *

19. Engaging in disruptive behavior;

* * *

22. Communicating any false, disparaging, vicious, or malicious statements concerning the County, another person, or other organizations;

* * *

24. Engaging in any **unethical conduct** or in any behavior that creates an actual, potential, or perceived conflict of interest;

62. Policy 410 entitled "Corrective Action and Employee Accountability" states in relevant part:

It is the policy of the County that all employees, in the performance of their job responsibilities, are expected to achieve established performance standards, and that, whenever those standards are not achieved, the employee will be held accountable. The County will exercise appropriate corrective actions to ensure performance improvement and/or proper accountability.

It is also the policy of the County that all employees are responsible for their own behavior in the workplace and that they will conduct themselves in a manner which complies with established standards of conduct for their jobs and the expectations of the County. Whenever employee conduct does not meet the established standard or expectation, the employee will be held accountable, and the County will exercise appropriate corrective action to ensure accountability.

63. Policy 410-1 entitled "Assessment of Employee Performance and/or Behavior Issues" states in relevant part:

All County employees are expected to (1) perform their job duties in a manner that meets the performance standards established by the County; and (2) behave, in the workplace, in a manner that

complies with standards of conduct prescribed or reasonably expected by the County. When an employee's performance or conduct does not meet or comply with those expectations, then the employee's actions should be reviewed, and when appropriate, the employee should be held accountable through a corrective action process.

64. Defendant Moriarty's behavior during and after the mediation was "prohibited conduct" as defined by Johnson County's Policies.

65. Defendant Moriarty has never been disciplined for his conduct.

COUNT I
42 U.S.C. §1983

66. Plaintiff hereby adopts, realleges and incorporates by reference the allegations contained in paragraphs 1 through 65 above.

67. Defendant Moriarty is sued in his individual capacity in regards to plaintiff's request for monetary damages and he is not entitled to immunity for his actions.

68. During and after the mediation, defendant Moriarty intentionally engaged in unlawful practices by denying plaintiff her constitutional and legal rights, all in violation of 42 U.S.C. § 1983. These denials were done by policies, practices, procedures, patterns, decisions, instructions, orders, and customs that took place under color of law. Plaintiff was consequently deprived of her federal as well as state constitutional rights to equal protection. Furthermore, separately and additionally, defendant Moriarty had actual or constructive knowledge that others within his control were also causing deprivations of plaintiff Ireland's constitutional rights.

69. Plaintiff has been damaged as a direct and proximate result of defendant Moriarty's actions. In particular, she suffered injuries including, but not limited to:

- a. loss of income;
- b. loss of reputation;

- c. inconvenience;
- d. insult;
- e. mental distress;
- f. embarrassment;
- g. humiliation;
- h. anxiety; and
- i. emotional pain and suffering.

70. Soon after plaintiff Ireland filed her complaint against defendant Moriarty for his behavior during mediation, defendant Moriarty retaliated against her by, among other things:

- a. Meeting with opposing counsel in her divorce case;
- b. Requesting opposing counsel and his employees write letters stating that defendant Moriarty had not behaved inappropriately;
- c. Requesting opposing counsel and his employees write letters stating that plaintiff Ireland had behaved inappropriately;
- d. Requesting opposing counsel file an ethical complaint against plaintiff Ireland;
- e. Meeting with others to discuss plaintiff Ireland and influence her domestic case and ethical matters.

71. Defendant Moriarty's actions were willful, wanton, reckless and malicious, and further show a complete and deliberate indifference to, and conscious disregard for the rights of plaintiff.

72. Therefore, plaintiff is entitled to an award of punitive or exemplary damages in an amount sufficient to punish defendant or to deter defendant and others from like conduct in the future.

73. Plaintiff is entitled to recover from defendant reasonable attorneys' fees, as provided by 42 U.S.C. § 1988.

WHEREFORE, plaintiff prays this Court enter a judgment against defendant Moriarty for plaintiff's actual damages, nominal damages and exemplary or punitive damages as are proven at trial, for her reasonable attorneys' fees and costs incurred herein and for any such further legal and equitable relief as this Court deems appropriate.

COUNT II
42 U.S.C. §1985

74. Plaintiff hereby adopts, realleges and incorporates by reference the allegations contained in paragraphs 1 through 73 above.

75. Defendant Moriarty is sued in his individual capacity in regards to plaintiff's request for monetary damages and he is not entitled to immunity for his actions.

76. Defendant Moriarty and defendant County, acting individually and through their employees or agents, conspired with others to interfere with plaintiff's civil rights in violation of 42 U.S.C. §1985.

77. Plaintiff has been damaged as a direct and proximate result of defendants' actions. In particular, she suffered injuries including, but not limited to:

- a. loss of income;
- b. loss of reputation;
- c. inconvenience;
- d. insult;
- e. mental distress;
- f. embarrassment;
- g. humiliation;
- h. anxiety; and
- i. emotional pain and suffering.

78. Soon after plaintiff Ireland filed her complaint against defendant Moriarty for his behavior during mediation, defendant Moriarty retaliated against her by, among other things:

- a. Meeting with opposing counsel in her divorce case;
- b. Requesting opposing counsel and his employees write letters stating that defendant Moriarty had not behaved inappropriately;
- c. Requesting opposing counsel and his employees write letters stating that plaintiff Ireland had behaved inappropriately;
- d. Requesting opposing counsel file an ethical complaint against plaintiff Ireland;
- e. Meeting with others to discuss plaintiff Ireland and influence her domestic case and ethical matters.

79. Defendant County, through its agents or employees, was on notice of the behavior of defendant Moriarty and had a duty to report his behavior, instead defendant County, through its agents or employees, worked in concert with defendant Moriarty to retaliate against plaintiff Ireland.

80. Defendants' actions were willful, wanton, reckless and malicious, and further show a complete and deliberate indifference to, and conscious disregard for the rights of plaintiff.

81. Therefore, plaintiff is entitled to an award of punitive or exemplary damages in an amount sufficient to punish defendants or to deter defendants and others from like conduct in the future.

82. Plaintiff is entitled to recover from defendants her reasonable attorneys' fees, as provided by 42 U.S.C. § 1988.

WHEREFORE, plaintiff prays this Court enter a judgment against defendants for plaintiff's actual damages, nominal damages and exemplary or punitive damages as are proven at trial, for her reasonable attorneys' fees and costs incurred herein and for any such further legal and equitable relief as this Court deems appropriate.

DEMAND FOR JURY TRIAL AND DESIGNATION OF PLACE OF TRIAL

Plaintiff demands trial by jury in Kansas City of all issues so triable as a matter of right.

Respectfully submitted,

/s/ Kimberly J. Ireland

Kimberly J. Ireland

KS# 22016

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