

WILLIAM B. TERRY, CHARTERED
530 South Seventh Street
Las Vegas, Nevada 89101
(702) 385-0799

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WILLIAM B. TERRY, ESQ.
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WILLIAM B. TERRY, CHARTERED
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Attorney for Respondent

ORIGINAL



BEFORE THE NEVADA COMMISSION ON JUDICIAL DISCIPLINE

IN THE MATTER OF THE
HONORABLE CATHER RAMSEY,
Municipal Court Judge,

City of North Las Vegas, State of Nevada,

Respondent.

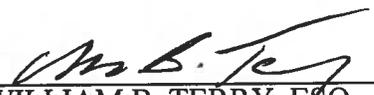
CASE NO. 2014-093-P

VERIFIED RESPONSE AND ANSWER

COMES NOW, the Respondent, CATHERINE RAMSEY, by and through her counsel,
WILLIAM B. TERRY, ESQ., of the law offices WILLIAM B. TERRY, CHARTERED and files the
instant Verified Response and/or Answer to the above-indicated Complaint.

DATED this 15th day of April, 2016.

WILLIAM B. TERRY, CHARTERED


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FACTUAL ALLEGATIONS

1
2 In answering the factual allegations, specifically, those allegations set forth within paragraph
3 A of the Formal Statement of Charges, the Respondent does deny that she violated Canon 2, Rule
4 2.5 (B) and Canon 1, Rule 1.2.

5 In answering the factual allegations, specifically, those allegations set forth within paragraph
6 B of the Formal Statement of Charges, the Respondent does deny that she violated Canon 2, Rules
7 2.6(A) and 2.9(A), and Canon 1, Rules 1.1 and 1.2.

8 In answering the factual allegations, specifically, those allegations set forth within paragraph
9 C of the Formal Statement of Charges, the Respondent does deny that she violated the Preamble of
10 the Revised Code of Judicial Conduct (“Preamble”). Further, Respondent denies that she violated
11 Canon 1, Rule 1.1, and Canon 2, Rules 2.2, 2.5 and 2.6(A).

12 In answering the factual allegations, specifically, those allegations set forth within paragraph
13 D of the Formal Statement of Charges, the Respondent does deny that she violated Canon 1, Rules
14 1.1 and 1.2, Canon 2, Rules 2.5(B), 2.5(A), 2.3(A), and 2.11(A)(1).

15 In answering the factual allegations, specifically, those allegations set forth within paragraph
16 E of the Formal Statement of Charges, the Respondent does deny that she violated the Preamble.
17 Further, Respondent denies that she violated Canon 1, Rules 1.1 and 1.2, Canon 2, Rules 2.2, 2.3(A),
18 2.5(A), and 2.8(B).

19 In answering the factual allegations, specifically, those allegations set forth within paragraph
20 F of the Formal Statement of Charges, the Respondent does deny that she violated Canon 1, Rules
21 1.1 and 1.2.

22 In answering the factual allegations, specifically, those allegations set forth within paragraph
23 G of the Formal Statement of Charges, the Respondent does deny that she violated the Preamble.
24 Further, Respondent denies that she violated Canons 1-3, Rules 1.2, 2.3(A) and (B), 2.5(B), 2.8(B),
25 and 3.1(E).

26 In answering the factual allegations, specifically, those allegations set forth within paragraph
27 H of the Formal Statement of Charges, the Respondent does deny that she violated Canon 1, Rules
28 1.2, 2.2, 2.3(A), 2.8(B) and Canon 2, Rule 2.11.

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COUNT ONE

In answering the allegations set forth in Count One, the Respondent does deny that she violated Canon 2, Rule 2.5 (B) and Canon 1, Rule 1.2.

COUNT TWO

In answering the allegations set forth in Count Two, the Respondent does deny that she violated Canon 2, Rules 2.6(A) and 2.9(A), and Canon 1, Rules 1.1 and 1.2.

COUNT THREE

In answering the allegations set forth in Count Three, the Respondent does deny that she violated the Preamble of the Revised Code of Judicial Conduct (“Preamble”). Further, Respondent denies that she violated Canon 1, Rule 1.1, and Canon 2, Rules 2.2, 2.5 and 2.6(A).

COUNT FOUR

In answering the allegations set forth in Count Four, the Respondent does deny that she violated Canon 1, Rules 1.1 and 1.2, Canon 2, Rules 2.5(B), 2.5(A), 2.3(A), and 2.11(A)(1).

COUNT FIVE

In answering the allegations set forth in Count Five, the Respondent does deny that she violated the Preamble. Further, Respondent denies that she violated Canon 1, Rules 1.1 and 1.2, Canon 2, Rules 2.2, 2.3(A), 2.5(A), and 2.8(B).

COUNT SIX

In answering the allegations set forth in Count Six, the Respondent does deny that she violated Canon 1, Rules 1.1 and 1.2.

COUNT SEVEN

In answering the allegations set forth in Count Seven, the Respondent does deny that she violated the Preamble. Further, Respondent denies that she violated Canons 1-3, Rules 1.2, 2.3(A) and (B), 2.5(B), 2.8(B), and 3.1(E).

COUNT EIGHT

In answering the allegations set forth in Count Eight, the Respondent does deny that she violated Canon 1, Rules 1.2, 2.2, 2.3(A), 2.8(B) and Canon 2, Rule 2.11.

AFFIRMATIVE DEFENSES

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2 In Paragraph A and Count One, Complainant fails to specifically allege how Respondent's
3 course of conduct violated each Canon alleged.

4 In Paragraph B and Count Two, Complainant fails to specifically allege how Respondent's
5 course of conduct violated each Canon alleged.

6 In Paragraph C and Count Three, Complainant fails to specifically allege how Respondent's
7 course of conduct violated each Canon alleged.

8 In Paragraph D and Count Four, Complainant fails to specifically allege how Respondent's
9 course of conduct violated each Canon alleged.

10 In Paragraph E and Count Five, Complainant fails to specifically allege how Respondent's
11 course of conduct violated each Canon alleged.

12 In Paragraph F and Count Six, Complainant fails to specifically allege how Respondent's
13 course of conduct violated each Canon alleged.

14 In Paragraph G and Count Seven, Complainant fails to specifically allege how Respondent's
15 course of conduct violated each Canon alleged.

16 In Paragraph H and Count 8, Complainant fails to specifically allege how Respondent's
17 course of conduct violated each Canon alleged.

18 Further, the charging does not sufficiently put the Respondent on notice of that which she
19 should be prepared to defend against and, also, the complaint is barred by the limitation of actions
20 under Rule 106. Respectfully submitted that the Judicial Ethics Panel lacks jurisdiction in the instant
21 case.

22 DATED this 15th day of April, 2016.

23 WILLIAM B. TERRY, CHARTERED

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25 _____
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VERIFICATION

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

CATHERINE RAMSEY, being first duly sworn, deposes and say:

That he is the Respondent in the above-entitled action; that she has read the foregoing Verified Response and Answer and knows the contents thereof; that the same is true of her own knowledge except for those matter therein contained stated upon information and belief, and as to those matter, she believes it to be true.

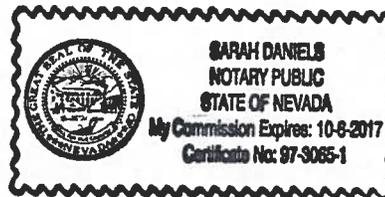
Catherine Ramsey

CATHERINE RAMSEY

SUBSCRIBED and SWORN to before
me this 15th day of April, 2016.

Sarah Daniels

NOTARY PUBLIC in and for said
County and State



CERTIFICATE OF MAILING

I hereby certify that on the 15th day of April, 2016, I, as an employee of WILLIAM B. TERRY, CHARTERED, caused to be served by first class mail, a copy of the foregoing **VERIFIED ANSWER & RESPONSE** with postage fully prepaid thereon, by depositing the same with the U.S. Postal Service or official depository for use thereof, addressed as follows:

Kathleen Paustian, Esq.
3205 Skipworth Drive
Las Vegas, Nevada 89107
Prosecuting Officer


As an employee of William B. Terry, Chtd.

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