

FILED

Nov 12, 2025

Disciplinary  
Board

Docket # 040

DISCIPLINARY BOARD  
WASHINGTON STATE BAR ASSOCIATION

In re

**DONALD ROBERT BUEHLER,**  
Lawyer (Bar No. 14284).

Proceeding No. 25#00016

ODC File No. 17-00746

Resignation Form of Donald Robert Buehler  
(ELC 9.3(b))

I, Donald Robert Buehler, declare as follows:

1. I am over the age of eighteen years and am competent. I make the statements in this declaration from personal knowledge.

2. I was admitted to practice law in the State of Washington on November 1, 1984.

3. I was served with a Formal Complaint and Notice to Answer in this matter on April 4, 2025. I served a Formal Answer on April 14, 2025 (which was stricken), a Supplemental Amended Formal Answer on August 11, 2025, and amendments to my Amended Formal Answer on September 14, 2025.

4. I have voluntarily decided to resign from the Washington State Bar Association (the Association) in Lieu of Discipline under Rule 9.3 of the Washington Supreme Court's Rules for Enforcement of Lawyer Conduct (ELC).

1           5. Attached hereto as Exhibit A is Disciplinary Counsel's statement of alleged  
2 misconduct for purposes of ELC 9.3(b). I am aware of the alleged misconduct stated in  
3 Disciplinary Counsel's statement, which is denied, but rather than defend against the allegations,  
4 I wish to permanently resign from membership in the Association.

5           6. I consent to entry of an order under ELC 13.9(e) assessing expenses of \$1,500 in  
6 this matter. I agree to arrange a payment plan of \$50 per month with the Office of Disciplinary  
7 Counsel to satisfy the order of expenses.

8           7. I agree to pay any additional costs or restitution that may be ordered by a Review  
9 Committee under ELC 9.3(g). I have been informed by ODC that ODC will not seek any  
10 additional costs or restitution under ELC 9.3(g).

11           8. I understand that my resignation is permanent and that any future application by me  
12 for reinstatement as a member of the Association is currently barred. If the Washington Supreme  
13 Court changes this rule or an application is otherwise permitted in the future, it will be treated as  
14 an application by one who has been disbarred for ethical misconduct. If I file an application, I  
15 will not be entitled to a reconsideration or reexamination of the facts, complaints, allegations, or  
16 instances of alleged misconduct on which this resignation was based.

17           9. I agree to (a) notify all other states and jurisdictions in which I am admitted, of this  
18 resignation in lieu of discipline; (b) seek to resign permanently from the practice of law in  
19 California and any other state or jurisdiction in which I am admitted; and (c) provide Disciplinary  
20 Counsel with copies of this notification and any response(s). I acknowledge that this resignation  
21 could be treated as a disbarment by all other jurisdictions.

22           10. I agree to (a) notify all other professional licensing agencies in any jurisdiction from  
23 which I have a professional license that is predicated on my admission to practice law of this

1 resignation in lieu of discipline; (b) seek to resign permanently from any such license; and (c)  
2 provide disciplinary counsel with copies of any of these notifications and any responses.

3 11. I agree that when applying for any employment, I will disclose the resignation in  
4 lieu of discipline in response to any question regarding disciplinary action or the status of my  
5 license to practice law.

6 12. I understand that my resignation becomes effective on Disciplinary Counsel's  
7 endorsement and filing of this document with the Clerk, and that under ELC 9.3(c) Disciplinary  
8 Counsel must do so promptly following receipt of this document.

9 13. When my resignation becomes effective, I agree to be subject to all restrictions that  
10 apply to a disbarred lawyer.


11 14. Upon filing of my resignation, I agree to comply with the same duties as a disbarred  
12 lawyer under ELC 14.1 through ELC 14.4.

13 15. I understand that, after my resignation becomes effective, it is permanent. I will  
14 never be eligible to apply and will not be considered for admission or reinstatement to the practice  
15 of law nor will I be eligible for admission for any limited practice of law.

16 16. Although the presumptive sanction for the charges alleged by ODC, which I deny,  
17 is suspension and not disbarment, I am choosing to resign in lieu of discipline under ELC 9.3.

18 17. I certify under penalty of perjury under the laws of the State of Washington that the  
19 foregoing is true and correct.

20  
21 11-17-2025, SPORANAE VAWAY  
22 Date and Place WA

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24   
Donald Robert Buehler  
Bar No. 14284

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Henry Cruz, Disciplinary Counsel  
Bar No. 38799

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8 DISCIPLINARY BOARD  
WASHINGTON STATE BAR ASSOCIATION

9  
10 In re

11 **DONALD ROBERT BUEHLER,**

12 Lawyer (Bar No. 14284).

Proceeding No. 25#00016

ODC File No. 17-00746

13 STATEMENT OF ALLEGED  
14 MISCONDUCT UNDER ELC 9.3(b)(1)

15 The attached formal complaint, filed on April 2, 2025, in Proceeding No. 25#00016,  
16 constitutes Disciplinary Counsel's statement of alleged misconduct under Rule 9.3(b)(1) of the  
17 Washington Supreme Court's Rules for Enforcement of Lawyer Conduct (ELC).

18 DATED this 12th day of November, 2025.

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21 Henry Cruz, Bar No. 38799  
22 Senior Disciplinary Counsel  
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FILED

Apr 2, 2025

Disciplinary  
Board

Docket # 002

DISCIPLINARY BOARD  
WASHINGTON STATE BAR ASSOCIATION

In re

**DONALD ROBERT BUEHLER,**

Lawyer (Bar No. 14284).

Proceeding No. 25#00016

FORMAL COMPLAINT

Under Rule 10.3 of the Washington Supreme Court's Rules for Enforcement of Lawyer Conduct (ELC), the Office of Disciplinary Counsel (ODC) of the Washington State Bar Association charges the above-named lawyer with acts of misconduct under the Washington Supreme Court's Rules of Professional Conduct (RPC) as set forth below.

**ADMISSION TO PRACTICE**

1. Respondent Donald Robert Buehler was admitted to the practice of law in the State of Washington on November 1, 1984.

**FACTS**

RPC 4.4(a) Violations

2. On October 30, 2013, Galie Jean-Louis, Shannon Freeman, and Susan Harrison, all licensed acupuncturists, entered into an Independent Practitionership Agreement (IPA).

1           3. Under the IPA, Jean-Louis, Freeman, and Harrison agreed to operate under the  
2 name Bellwether Medical Acupuncture and Massage (BMAM).

3           4. In November 2013, Jean-Louis, Freeman, and Susan Harrison entered into a  
4 commercial lease with the Port of Bellingham to share office space for their respective  
5 practices.

6           5. On May 5, 2014, Jean-Louis registered BMAM as a limited liability company and  
7 reported Jean-Louis, Freeman, and Harrison as members.

8           6. On May 30, 2014, Jean-Louis, Freeman, and Harrison amended the commercial  
9 lease by changing the lessee's name to BMAM.

10          7. A dispute arose between Jean-Louis and Freeman over their business relationship.

11          8. Respondent represented Freeman in the dispute.

12          9. Jean-Louis was initially represented by Kirsten Barron.

13          10. On April 7, 2015, the IPA was dissolved by majority vote of Freeman and  
14 Harrison.

15          11. On April 9, 2015, Jean-Louis filed an amended report with the Washington State  
16 Secretary of State naming Jean-Louis as the sole owner/member of BMAM.

17          12. Jean-Louis removed Freeman's access to the BMAM website.

18          13. Jeffery Grossman operated BMAM's website.

19          14. Upon being notified of a dispute over BMAM's ownership, Grossman restored  
20 Freeman's access to the BMAM website.

21          15. On April 13, 2015, Respondent was informed by Grossman of the restoration of  
22 Freeman's access to the BMAM website.

23          16. Later in April 2015, Grossman set up separate websites for Jean-Louis and

1 Freeman.

2 *Letter to Port of Bellingham*

3 17. In April 2015, Jean-Louis reported alleged marijuana activity by one of Freeman's  
4 employees to the Port of Bellingham.

5 18. On April 16, 2015, the Port of Bellingham issued a written notice to Jean-Louis,  
6 Freeman, and Harrison that federal law and the commercial lease prohibit the sale or  
7 distribution of marijuana on the premises and that failure to comply would result in the Port  
8 taking further action under the lease terms including issuance of a default notice.

9 19. No further action was requested or taken by the Port of Bellingham regarding the  
10 alleged marijuana activity.

11 20. In a letter dated April 20, 2015, Respondent responded to the Port of Bellingham's  
12 April 16, 2015 notice.

13 21. In Respondent's April 20, 2015 letter to the Port of Bellingham, Respondent  
14 stated:

15 (a) Jean-Louis's report to the Port of Bellingham "appears to be related to an edict  
16 from Ms. Jean-Louis' attorney motivated by a desire to compel her partners, Ms.  
17 Freeman and Ms. Harrison, to mediate and arbitrate her fraudulent demands."

18 (b) Jean-Louis filed the BMAM corporate documents with only Jean-Louis listed as  
19 a manager, and therefore Jean-Louis "misrepresent[ed]" the nature of the  
20 corporate documents filing, which was an "act of fraud" in violation of RCW  
21 9A.60.020 and 9A.60.030, "when one considers the consent to file the corporate  
22 documents was fraudulently induced when Ms. Jean-Louis represented she  
23 would 'take care of everything' and filed the documents under false pretenses."



1 (c) Jean-Louis made the report to the Port of Bellingham “to advance the fraud” and  
2 “force Ms. Freeman and Ms. Harrison to give Ms. Jean-Louis more  
3 organizational power and money[.]”

4 (d) Jean-Louis “fraudulently removed Ms. Freeman and Ms. Harrison from the  
5 BMAM web page claiming she ‘owned’ the BMAM ‘trade name’ – a position  
6 that is false. The termination of the web page was theft by access device, RCW  
7 9A.56.040 because Ms. Freeman and Ms. Harrison had paid to develop the web  
8 page and were paying the monthly service fee to use the BMAM web page.”

9 (e) “[E]ach time Ms. Jean-Louis collected funds for the lease, utilities, insurance and  
10 web page, she was committing a separate act of fraud under RCW 9A.60.020 and  
11 030. This series of acts satisfies the elements of leading organized crime under  
12 RCW 9A.82.060.”

13 (f) Neither Freeman nor Harrison participated “in this pattern of criminal  
14 profiteering of RCW 9A.82.010(4) [and] (12).”

15 (g) “Ms. Jean Louis – as she admits – ‘owned’ the criminal ‘enterprise’  
16 (9A.82.010(8)) she created.”

17 (h) “It is against this backdrop of criminal activity that Ms. Jean-Louis fraudulently  
18 ‘assumed’ marijuana was being used and distributed – so she and her attorney  
19 could attempt to extort Ms. Freeman and Ms. Harrison into agreeing to mediate a  
20 new [business agreement].”

21 22. Respondent’s accusations against Jean-Louis at paragraph 21 were irrelevant to the  
22 Port of Bellingham matter.

23 23. Respondent’s accusations against Jean-Louis at paragraph 21 had no factual basis.

1       *Letters to Barron and Mowrey*

2       24. On April 22, 2025, Freeman registered BMAM as a trade name for Freeman's  
3 business.

4       25. On April 24, 2015, Respondent wrote to Barron and Emily Mowrey, Grossman's  
5 lawyer, demanding an immediate takedown of all web pages and social media that state Jean-  
6 Louis is associated with BMAM.

7       26. In Respondent's April 24, 2015 letter to Barron and Mowrey, Respondent also  
8 stated:

9           (a) Freeman first used BMAM as a trade name in November 2013.

10          (b) Jean-Louis engaged in "fraudulent misrepresentation" by asserting any form of  
11 rights to BMAM.

12          (c) Barron and Mowrey advised their respective clients that this "fraud" was  
13 appropriate.

14          (d) Jean-Louis, Barron, Mowrey, and Grossman were involved in a criminal  
15 enterprise, including theft and leading organized crime.

16       27. On April 29, 2015, Respondent wrote to Mowrey, reiterating the takedown demand  
17 and accusing Mowrey of committing federal mail or wire fraud by claiming communications  
18 between Jean-Louis and Grossman were privileged.

19       28. Respondent's statements at paragraphs 26 and 27 had no factual basis.

20       *Email to Marx*

21       29. On May 1, 2015, Respondent emailed Leah Marx, an employee of Jean-Louis,  
22 about some of Freeman's mail reportedly being missing or opened, and/or having notes  
23 allegedly in Jean-Louis's handwriting on the envelopes.

30. In Respondent's May 1, 2015 email to Marx, Respondent also stated:

(a) "Interfering with U.S. mail can be a federal felony."

(b) If Marx did not cooperate, Respondent would take the position that Marx was acting in concert with Jean-Louis and therefore "jointly responsible."

31. Respondent's statements to Marx that implied Marx would be jointly liable for a federal felony offense had no factual basis.

*Letter to DOH, WSBA, and Whatcom County Prosecutor*

32. On June 5, 2015, Respondent submitted a letter in the form of a complaint against Jean-Louis with the Washington State Department of Health (DOH), the Washington State Bar Association, and the Whatcom County Prosecutor.

33. In Respondent's June 5, 2015 letter, Respondent stated:

(a) Jean-Louis committed multiple acts of fraud, criminal profiteering, theft of an access device, extortion, and wire fraud.

(b) Dr. Vincent Matteucci, Jean-Louis's spouse, possibly committed criminal profiteering for filing false complaints under RCW 9A.76.175 and RCW.9A.72.030 and 080.

(c) Barron engaged in "apparently aiding, abetting, and participating in multiple acts of fraud and criminal conduct with [Jean-Louis]."

(d) Mowrey and another lawyer engaged in "apparent complicity with Ms. Barron."

(e) Jean-Louis was a "passive-aggressive narcissist with sociopathic tendencies."

34. Respondent's statements at paragraph 33 had no factual basis.

35. Respondent's statement at paragraph 33(e) was irrelevant to any of Respondent's complaints in Respondent's June 5, 2015 letter.

1           36. The DOH determined the evidence did not support Respondent's claims in  
2 Respondent's June 5, 2015 letter.

3           37. Neither the Whatcom County Prosecuting Attorney's Office nor any law  
4 enforcement agency opened an investigation or prosecution in connection with Respondent's  
5 June 5, 2015 letter.

6           *Email to DOT*

7           38. Jean-Louis or Matteucci filed a complaint with the Ferries Division of the  
8 Washington State Department of Transportation (DOT), alleging an incident of harassment by  
9 Freeman's spouse, a Washington State Ferries employee.

10          39. On July 15, 2015, Respondent, as the lawyer of Freeman's spouse, sent an email to  
11 DOT in response to the complaint.

12          40. In Respondent's July 15, 2015 email to DOT, Respondent stated:

13           (a) Jean-Louis was a "sociopathic narcissist."

14           (b) Jean-Louis committed a "series of criminal acts."

15           (c) Jean-Louis "was being investigated for multiple counts of fraud and forgery  
16 related to her dealings with [Freeman] and the partnership."

17          41. Respondent's statements at paragraph 40 had no factual basis.

18          42. There was no active investigation by law enforcement into any fraud or forgery  
19 activity by Jean-Louis at the time of Respondent's July 15, 2015 email to DOT.

20          43. Respondent's statements at paragraph 40 were irrelevant to the DOT matter.

21           *Demand Letter and Draft Complaint*

22          44. On or about September 6, 2016, Respondent sent a demand letter and draft  
23 complaint to Jean-Louis, Matteucci, Barron, Mowrey, and Grossman.

1       45. The draft complaint alleged, inter alia, that:

2           (a) Jean-Louis committed fraud, forgery, and criminal profiteering.

3           (b) Matteucci, Barron, Grossman, and Mowery aided and abetted, acted in concert  
4           with, and/or conspired with Jean-Louis in committing the alleged criminal  
5           activity.

6       46. Apart from Freeman alleging that Jean-Louis forged Freeman's signature on the  
7       IPA, there was no factual basis for Respondent's accusations at paragraph 45.

8       47. In the September 6, 2016 demand letter, Respondent stated they all could expect an  
9       award exceeding \$1,000,000 after trial and demanded a \$500,000 settlement payment within 30  
10      days to avoid filing the lawsuit.

11      48. In the September 6, 2016 demand letter, Respondent stated that if Respondent did  
12      not hear from Matteucci within five days, Respondent would contact Matteucci's business  
13      partner concerning the allegations because "it is known [Matteucci] provided support to [Jean-  
14      Louis] during what appears to be business hours" and, therefore, "it is likely" Matteucci used  
15      assets of Matteucci's own business and otherwise involved Matteucci's business to advance  
16      Jean-Louis's alleged criminal activities.

17      49. Respondent's threat that Respondent would contact Matteucci's business partner  
18      was irrelevant to the matter underlying Respondent's demand letter.

19      50. Respondent received no attempts at settlement in response to Respondent's  
20      September 6, 2016 demand letter.

21      51. Respondent never filed the complaint.  
22  
23

1        *Letter to Attorney General*

2        52. On September 27, 2016, Jean-Louis and Matteucci filed a complaint in Whatcom  
3 County Superior Court (Jean-Louis, et al. v. Buehler, Case No. 16-2-01565-1) alleging, inter  
4 alia, defamation and outrage by Respondent.

5        53. Respondent represented himself in the lawsuit.

6        54. On or about November 4, 2016, Respondent sent a letter to Washington State  
7 Attorney General Bob Ferguson asking the Attorney General to look into the DOH's dismissal  
8 of Respondent's June 5, 2015 complaint.

9        55. In Respondent's November 4, 2016 letter to Attorney General Ferguson,  
10 Respondent accused Jean-Louis of using the DOH's dismissal of Respondent's June 5, 2015  
11 complaint to "advance her criminal enterprise."

12        56. Respondent's accusation against Jean-Louis at paragraph 55 had no relevance to  
13 the underlying matter of Respondent's November 4, 2016 letter to Attorney General Ferguson.

14        57. Respondent's accusation against Jean-Louis at paragraph 55 had no factual basis.

15        *Letter to DOH, Port of Bellingham, Bellingham Police Department, and DOT*

16        58. On June 21, 2018, Respondent sent a public records request to the DOH, Port of  
17 Bellingham, Bellingham Police Department, and the DOT.

18        59. In Respondent's June 21, 2018 public records request, Respondent stated:

19            (a) Jean-Louis and Matteucci committed unprofessional conduct under RCW  
20            18.130.180 by filing the lawsuit in retaliation for Respondent submitting the  
21            DOH complaint against Jean-Louis.

22            (b) Jean-Louis and Matteucci committed unprofessional conduct under RCW  
23            18.130.180 by filing a bar grievance against Respondent to "harass" and

1 “prevent” Respondent from continuing to pursue a DOH complaint.

2 60. Respondent’s accusations against Jean-Louis and Matteucci at paragraph 59 had no  
3 relevance to Respondent’s June 21, 2018 public records request.

4 61. Respondent’s accusations against Jean-Louis or Matteucci at paragraph 59 had no  
5 factual basis.

6 62. At a summary judgment hearing on August 23, 2018, Respondent stated that  
7 Respondent never received documents from Barron that, according to Respondent, would have  
8 established the alleged criminal activity against Jean-Louis.

9 63. At the August 23, 2018 summary judgment hearing, the trial court noted that  
10 Respondent’s statements in the April 20, 2015 letter and July 15, 2015 email that Jean-Louis  
11 and others committed crimes went “well-beyond” the scope of the complaints to the Port of  
12 Bellingham and the DOT.

13 64. At the August 23, 2018 summary judgment hearing, the trial court found there was  
14 no evidence in the record that Jean-Louis committed fraud, theft of an access device, or other  
15 crimes, and therefore there was no issue of fact that those statements were false.

16 65. At the August 23, 2018 summary judgment hearing, the trial court found that  
17 Respondent’s conduct was reckless.

18 Frivolous Arguments and Failure to Comply with Court Orders

19 66. On October 19, 2018, the trial court issued orders:

20 (a) granting plaintiffs’ motion for partial summary judgment on the defamation  
21 claim solely as to Respondent’s April 20, 2015 letter to the Port of Bellingham  
22 and Respondent’s July 15, 2015 email to the DOT;

23 (b) striking some of Respondent’s affirmative defenses and dismissing all of

Respondent's counterclaims; and

(c) denying Respondent's cross-motion for summary judgment.

67. Respondent sought interlocutory discretionary review of the three trial court orders entered on October 19, 2018.

68. On October 29, 2018, Respondent filed a motion for reconsideration of the trial court's October 19, 2018 orders.

69. Respondent's October 29, 2018 motion for reconsideration argued, in part, that the trial court lacked "subject matter jurisdiction" because the plaintiffs failed to request clarification or correction of the alleged defamatory statements in accordance with RCW 7.96.040.

70. On January 14, 2019, a commissioner of the court of appeals denied discretionary review of the three trial court orders entered on October 19, 2018.

71. On February 6, 2019, the trial court denied Respondent's October 29, 2018 motion for reconsideration.

72. Respondent sought interlocutory discretionary review of the trial court's February 6, 2019 reconsideration denial.

73. On May 7, 2019, the court of appeals denied Respondent's motion to modify the commissioner's January 14, 2019 ruling.

74. Respondent did not seek discretionary review of the May 7, 2019 court of appeals decision with the Washington Supreme Court.

75. On May 20, 2019, a commissioner of the court of appeals denied discretionary review of the trial court's February 6, 2019 denial of reconsideration.

76. The commissioner's May 20, 2019 ruling noted that RCW 7.96.040 does not limit



1 a court's subject matter jurisdiction over defamation claims and, therefore, the trial court would  
2 not have abused its discretion if it had rejected Respondent's argument for failure to raise it  
3 prior to the summary judgment rulings.

4 77. On November 8, 2019, the court of appeals denied Respondent's motion to modify  
5 the commissioner's May 20, 2019 ruling.

6 78. On March 18, 2020, a commissioner of the Washington Supreme Court denied  
7 discretionary review of the November 8, 2019 court of appeals decision.

8 79. The Court commissioner's March 18, 2020 ruling noted that Respondent raised the  
9 RCW 7.96.040 compliance issue for the first time after the trial court entered its oral summary  
10 judgment rulings, and that a motion for reconsideration "is not a proper vehicle for advancing  
11 new theories of a case that could have been asserted before the superior court made its  
12 decision."

13 80. The Court commissioner made the following findings in the March 18, 2020  
14 ruling:

15 (a) Plaintiffs complied with RCW 7.96.040 by timely serving Respondent with the  
16 summons and complaint.

17 (b) Respondent failed to timely challenge the plaintiffs' compliance with RCW  
18 7.96.040.

19 (c) Respondent's other arguments were raised in Respondent's previous motion for  
20 discretionary review, which the court of appeals denied and of which Respondent  
21 did not seek the Court's discretionary review.

22 81. The Court commissioner concluded that Respondent's motion for discretionary  
23 review of the trial court's reconsideration denial was "so devoid of merit as to be frivolous, and

1 that it is improperly intended to delay finality of this case.”

2 82. The Court commissioner awarded reasonable attorney fees and costs to plaintiffs.

3 83. On July 8, 2020, the Court denied Respondent’s motion to modify the  
4 commissioner’s March 18, 2020 ruling.

5 84. On July 20, 2020, the Court awarded plaintiffs reasonable attorney fees and costs  
6 in the amount of \$9,040.

7 85. On August 12, 2020, the trial court entered judgment on the attorney fees and costs  
8 awarded by the Supreme Court at 12% interest per annum.

9 86. Respondent filed a second motion for summary judgment.

10 87. In Respondent’s second motion for summary judgment, Respondent again raised  
11 the RCW 7.96.040 compliance issue.

12 88. On September 21, 2021, the trial court entered an order denying Respondent’s  
13 second motion for summary judgment.

14 89. In the trial court’s September 21, 2021 order, the trial court found it had  
15 specifically considered Respondent’s arguments related to the RCW 7.96.040 compliance issue  
16 in denying Respondent’s motion to reconsider.

17 90. The trial court also found that Respondent’s second motion for summary judgment,  
18 as it related to the RCW 7.96.040 compliance issue, was filed for “improper purposes, including  
19 to cause unnecessary delay and needlessly increase the cost of litigation.”

20 91. The trial court awarded attorney fees and costs to plaintiffs as sanctions against  
21 Respondent.

22 92. On October 20, 2021, the trial court awarded plaintiffs attorney fees and costs in  
23 the amount of \$2,512.

1           93. On February 8, 2024, Respondent filed a motion to dismiss, arguing that the  
2 plaintiffs failed to timely file their disclosure of witnesses.

3           94. The plaintiffs had filed their disclosure of witnesses on August 25, 2021, prior to  
4 multiple continuances and new trial settings.

5           95. The plaintiffs were not proposing any new witnesses.

6           96. The trial court denied Respondent's motion to dismiss, finding it was not  
7 reasonable to interpret deadlines imposed with each new trial setting as requiring the parties to  
8 re-file the same witness list.

9           97. On March 19, 2024, a jury rendered verdicts in favor of the plaintiffs, concluding  
10 that:

11               (a) Respondent's conduct was outrageous; and

12               (b) Respondent's May 1, 2015 email, June 5, 2015 letter, September 6, 2016 letter,  
13 November 4, 2016 letter, and June 21, 2018 letter contained defamatory  
14 statements against Jean-Louis and Matteucci.

15           98. The jury awarded plaintiffs damages in the sum of \$500,000.

16           99. On April 12, 2024, the trial court entered judgment on the jury verdict at 10.5%  
17 interest per annum.

18           100. On June 28, 2024, the trial court entered an order denying Respondent's motion for  
19 new trial and cross-motion to dismiss.

20           101. On June 28, 2024, the trial court entered a separate order awarding \$61,356.55 in  
21 attorney fees and costs to plaintiffs.

22           102. In the trial court's June 28, 2024 order awarding attorney fees, the trial court found  
23 Respondent "repeatedly violated CR 11" as follows:

1 From the beginning of this matter, and continuing throughout trial, defendant  
2 Buehler pursued counterclaims and defenses that were frivolous and advanced  
3 without reasonable cause. Following the October 19, 2018 dismissal of these  
4 counterclaims and defenses, defendant Buehler continued to pursue these claims  
5 and defenses through filings, legal argument, witness examinations, and  
6 proposed jury instructions.

7 From the beginning of this matter, and continuing throughout trial, defendant  
8 Buehler pursued counterclaims and defenses that were not well grounded in fact,  
9 not warranted by existing law or the establishment of new law, and were instead  
10 imposed for improper purposes, such as to harass or to cause unnecessary delay  
11 or needless increase in the cost of litigation. Following the October 19, 2018  
12 dismissal of these counterclaims and defenses, defendant Buehler continued to  
13 pursue these claims and defenses through filings, legal argument, witness  
14 examinations, and proposed jury instructions.

15 103. On August 23, 2024, the trial court entered judgment on the \$61,356.55 awarded in  
16 attorney fees and costs at 10.5% interest per annum.

17 104. Respondent did not appeal any of the judgments, the October 20, 2021 order  
18 awarding attorney fees and costs, or the June 28, 2024 order denying Respondent's cross-  
19 motion to dismiss and motion for new trial.

20 105. Respondent has not paid any of the court-ordered attorney fees or costs.

21 106. Respondent was aware of the court-ordered attorney fees and costs.

22 107. Respondent has not paid any amount of the awarded damages.

23 108. Respondent was aware of the judgment awarding damages to the plaintiffs.

### **COUNT 1**

19 109. By repeatedly making criminal and/or other accusations against one or more  
20 individuals that had no basis in law or fact and/or were not relevant to the underlying matter,  
21 Respondent violated RPC 4.4(a) (using means that have no substantial purpose other than to  
22 embarrass or burden a third person).

1 **COUNT 2**

2 110. By filing motions and appeals that had no basis in law or fact and/or by asserting  
3 issues that previously had been found frivolous by the Washington Supreme Court and/or  
4 previously had been rejected in a prior interlocutory appeal, Respondent violated RPC 3.1, RPC  
5 3.4(c), RPC 4.4(a) (using means that have no substantial purpose other than to delay or burden a  
6 third person), and/or RPC 8.4(d).

7 **COUNT 3**

8 111. By failing to pay the court-ordered attorney fees and costs and/or the damages  
9 awarded by judgment, Respondent violated RPC 3.4(c), RPC 8.4(d), and/or RPC 8.4(j).

10  
11 THEREFORE, Disciplinary Counsel requests that a hearing be held under the Rules for  
12 Enforcement of Lawyer Conduct. Possible dispositions include disciplinary action, probation,  
13 restitution, and assessment of the costs and expenses of these proceedings.

14  
15 Dated this 2nd day of April, 2025.

16 

17 \_\_\_\_\_  
18 Henry Cruz, Bar No. 38799  
19 Senior Disciplinary Counsel  
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