

FILED

Jan 6, 2026

Disciplinary
Board

Docket # 018

DISCIPLINARY BOARD
WASHINGTON STATE BAR ASSOCIATION

In re
TIMOTHY RONALD RICHARDS,
Lawyer (Bar No. 44812).

Proceeding No. 24#00066

ODC File No. 23-00779

STIPULATION TO SUSPENSION

Following settlement conference conducted
under ELC 10.12(h)

Under Rule 9.1 of the Washington Supreme Court's Rules for Enforcement of Lawyer Conduct (ELC), and following a settlement conference conducted under ELC 10.12(h), the following Stipulation to suspension is entered into by the Office of Disciplinary Counsel (ODC) of the Washington State Bar Association (Association) through disciplinary counsel Briana Gieri, Respondent's Counsel Kevin Bank and Respondent lawyer Timothy Richards.

Respondent understands that Respondent is entitled under the ELC to a hearing, to present exhibits and witnesses on Respondent's behalf, and to have a hearing officer determine the facts, misconduct and sanction in this case. Respondent further understands that Respondent is entitled under the ELC to appeal the outcome of a hearing to the Disciplinary Board, and, in certain cases, the Supreme Court. Respondent further understands that a hearing and appeal could result in an outcome more favorable or less favorable to Respondent. Respondent chooses to resolve this

proceeding now by entering into the following stipulation to facts, misconduct and sanction to avoid the risk, time, and expense attendant to further proceedings.

I. ADMISSION TO PRACTICE

1. Respondent was admitted to practice law in the State of Washington on May 29, 2012.

II. STIPULATED FACTS

2. On or about August 12, 2022, Respondent filed a petition for dissolution from Catherine Vincler: Richards v. Richards, King County Superior Court, Case No. 22-3-03934-9 KNT (the “dissolution”).

3. At all times relevant herein, Respondent was self-represented.

4. At all times relevant herein, lawyer Sara Epler represented Vincler in the dissolution case.

5. After September 1, 2022, Respondent knew that Epler represented Vincler, yet on one or more occasions Respondent communicated with Vincler about subject matter of the representation.

Dissolution Court Orders

6. On February 23, 2023, the court entered an agreed final restraining order restricting Respondent’s contact and communication with Vincler and their minor child. The final restraining order prohibited Respondent from disturbing the peace of Vincler.

7. On February 24, 2023, the court entered an agreed final parenting plan, narrowing the scope of authorized communications between the Parties, as follows:

The parents will communicate respectfully with one another and without the use of swear words, insults, or other demeaning communication. The parents shall use OurFamilyWizard for communication regarding [minor child] only. Video greetings to [minor child] are permitted through email, or another electronic means agreed upon by the parent, unless OFW begins to allow videos to be sent through it.

1

2 In the case of a medical or other bona fide emergency (e.g. natural disaster, invading
3 extraterrestrials), parents may text or call.

4 **Violations of Dissolution Court Orders via Text Messages**

5 8. Between March 11 and March 12, 2023, Respondent sent Vincler multiple text
6 messages.

7 9. Respondent knew that the final parenting plan stated that without a medical or other
8 bona fide emergency, Respondent was prohibited from contacting Vincler through text message.

9 10. Respondent also knew that the final parenting plan required respectful communication
10 free of “swear words, insults, or other demeaning communication.”

11 11. None of these text messages from Respondent were sent due to a bona fide emergency,
12 and were further sent with insults, swear words, and other demeaning communications.

13 12. One or more of Respondent’s text messages to Vincler on March 11 and March
14 12, 2023, violated the final parenting plan.

15 13. One or more of these text messages from Respondent to Vincler disturbed
16 Vincler’s peace and harassed Vincler.

17 14. One or more of Respondent’s text messages to Vincler on March 11 and March
18 12, 2023, violated the final restraining order.

19 **Violations of Dissolution Court Orders via OFW Messages**

20 15. On March 11, 2023, Respondent sent Vincler five individual OFW messages.

21 16. One or more of these OFW messages from Respondent to Vincler disturbed
22 Vincler’s peace and harassed Vincler, in violation of the February 23, 2023 final restraining order.

23 **Violations of Dissolution Court Orders via Phone Calls**

24 17. On March 11, 2023, Respondent called Vincler multiple times.

1 18. One or more of these phone calls from Respondent to Vincler disturbed Vincler's
2 peace and harassed Vincler, in violation of the February 24, 2023 final parenting plan.

3 **Violations of the Domestic Violence Protection Order**

4 19. On March 15, 2023, the court signed a temporary domestic violence protection
5 order (temporary DVPO), prohibiting Respondent from contact with Vincler or their child. The
6 temporary DVPO was in effect through April 28, 2023.

7 20. As of March 23, 2023, Respondent had knowledge of the temporary DVPO and
8 the terms therein.

9 21. On April 23, 2023, Respondent called Vincler multiple times and left one or more
10 messages on Vincler's voicemail in violation of the temporary DVPO and the February 23, 2023
11 final restraining order.

12 **Harassment of Third Parties – Moreira**

13 22. During the dissolution, Vincler resided in the marital home. Elba Moreira rented
14 a separate unit and paid \$600 per month rent to Vincler.

15 23. Respondent had knowledge that Moreira was in the United States on an
16 employment Visa.

17 24. Sometime after the dissolution filing, Respondent asked Moreira, a friend, to write
18 a declaration in support of Respondent for the dissolution, but Moreira refused.

19 25. On January 27, 2023, Respondent contacted Moreira's employer by email
20 claiming that Moreira was mentally unstable.

21 26. On or about February 7, 2023, Respondent asked Moreira to move out of Vincler's
22 home, but Moreira refused. When Moreira refused, Respondent pressured Moreira to vacate the
23 unit by reporting Moreira's rental in Vincler's home to the Seattle Department of Construction

1 and Inspections as violating city code. Respondent then texted Moreira calling Moreira
2 derogatory names in Spanish.

3 27. Respondent's conduct described above relating to Moreira served no substantial
4 purpose other than to embarrass, delay, or burden Moreira.

5 **Harassment of Third Parties – Epler**

6 28. During the dissolution, on two or more occasions Respondent engaged in harassing
7 conduct toward Epler via telephone and written communication.

8 29. In February 2023, Epler informed Respondent that Epler would only communicate
9 with Respondent in writing.

10 30. On April 21, 2023, sometime after 3:00 p.m. Respondent emailed Epler regarding
11 residential time with Respondent's child that weekend, but Epler did not respond.

12 31. On Sunday April 23, 2023, Respondent drove to Epler's house and demanded
13 Epler speak to Respondent. Epler asked Respondent to leave. Prior to leaving Epler's properly,
14 Respondent intentionally scratched Epler's vehicle.

15 32. As a result of Respondent showing up to Epler's home, Epler withdrew from
16 representing Vincler.

17 33. Respondent's conduct described above relating to Epler served no substantial
18 purpose other than to embarrass, delay, or burden Epler.

19 34. Respondent's conduct was intended by Respondent to harass Epler, which
20 impacted the litigation by causing Epler to withdraw from representing Vincler.

21 **III. STIPULATION TO MISCONDUCT**

22 35. Count I: By communicating with Vincler on one or more occasions about the
23 subject matter of the representation, with knowledge at the time of the communication(s) that

Vincler was represented by Epler, Respondent violated RPC 4.2.

36. Count II: By harassing Epler and damaging Epler's property, Respondent violated RPC 4.4(a) and RPC 8.4(d).

37. Count III: By knowingly violating one or more court orders related to Vincler, Respondent violated RPC 3.4(c), RPC 8.4(d), and RPC 8.4(j).

38. Count IV: By using means attempting to impact Moreira's employment and housing status that have no substantial purpose other than to embarrass, delay, or burden Moreira, Respondent violated RPC 8.4(a) and RPC 4.4(a).

39. During the time Epler represented Vincler, Respondent was significantly impacted by the stress of Respondent's divorce and being separated from Respondent's minor child. Respondent was also experiencing severe anxiety and depression which substantially contributed to Respondent's misconduct. Respondent has engaged in treatment, and Respondent's recovery is demonstrated by a meaningful and sustained period of successful rehabilitation, and the recovery has arrested the misconduct and recurrence of that misconduct is unlikely.

IV. PRIOR DISCIPLINE

40. No prior discipline.

V. APPLICATION OF ABA STANDARDS

41. The following American Bar Association Standards for Imposing Lawyer Sanctions (1991 ed. & Feb. 1992 Supp.) apply to this case:

42. ABA Standard 6.3 applies to Respondent's violations of RPC 4.2 by communicating with a represented party (Count 1).

6.3 Improper Communications with Individuals in the Legal System

6.31 Disbarment is generally appropriate when a lawyer:

(a) intentionally tampers with a witness and causes serious or potentially serious injury to a party, or causes significant or potentially significant

interference with the outcome of the legal proceeding; or
(b) makes an ex parte communication with a judge or juror with intent to affect the outcome of the proceeding, and causes serious or potentially serious injury to a party, or causes significant or potentially significant interference with the outcome of the legal proceeding; or
(c) improperly communicates with someone in the legal system other than a witness, judge, or juror with the intent to influence or affect the outcome of the proceeding, and causes significant or potentially significant interference with the outcome of the legal proceeding.

6.32 Suspension is generally appropriate when a lawyer engages in communication with an individual in the legal system when the lawyer knows that such communication is improper, and causes injury or potential injury to a party or causes interference or potential interference with the outcome of the legal proceeding.

6.33 Reprimand is generally appropriate when a lawyer is negligent in determining whether it is proper to engage in communication with an individual in the legal system, and causes injury or potential injury to a party or interference or potential interference with the outcome of the legal proceeding.

6.34 Admonition is generally appropriate when a lawyer engages in an isolated instance of negligence in improperly communicating with an individual in the legal system, and causes little or no actual or potential injury to a party, or causes little or no actual or potential interference with the outcome of the legal proceeding.

43. Respondent knew that communications about case related issues with Vincler, outside the scope of the applicable court orders and without Epler or Vincler's consent were improper.

44. Vincler suffered emotional injuries due to Respondent's conduct.

45. The presumptive sanction for Count 1 is suspension under ABA Standard 6.32.

46. ABA Standard 7.0 applies to Respondent's violations of RPC 4.4(a) and 8.4(d) (Count 2):

7.0 Violations of Other Duties as a Professional

7.1 Disbarment is generally appropriate when a lawyer knowingly engages in conduct that is a violation of a duty owed as a professional with the intent to obtain a benefit for the lawyer or another, and causes serious or potentially serious injury to a client, the public, or the legal system.

7.2 Suspension is generally appropriate when a lawyer knowingly engages in conduct that is a violation of a duty owed as a professional and causes injury or potential injury to a client, the public, or the legal system.

7.3 Reprimand is generally appropriate when a lawyer negligently engages in

conduct that is a violation of a duty owed as a professional and causes injury or potential injury to a client, the public, or the legal system.

7.4 Admonition is generally appropriate when a lawyer engages in an isolated instance of negligence that is a violation of a duty owed as a professional, and causes little or no actual or potential injury to a client, the public, or the legal system.

47. Respondent knowingly harassed Epler and intentionally damaged Epler's vehicle.

48. Epler suffered actual injury because Epler's vehicle was damaged and Epler experienced emotional distress. Furthermore, Epler felt the need to withdraw from representing Vincler, thereby causing actual harm to Vincler.

49. The presumptive sanction for Count 2 is suspension under ABA Standard 7.2.

50. ABA Standard 6.2 applies to Respondent's violations of RPC 3.4(c), RPC 8.4(d), RPC 8.4(j), as charged in Count 3.

6.2 Abuse of the Legal Process

6.21 Disbarment is generally appropriate when a lawyer knowingly violates a court order or rule with the intent to obtain a benefit for the lawyer or another, and causes serious injury or potentially serious injury to a party or causes serious or potentially serious interference with a legal proceeding.

6.22 Suspension is generally appropriate when a lawyer knows that he or she is violating a court order or rule, and causes injury or potential injury to a client or a party, or causes interference or potential interference with a legal proceeding.

6.23 Reprimand is generally appropriate when a lawyer negligently fails to comply with a court order or rule, and causes injury or potential injury to a client or other party, or causes interference or potential interference with a legal proceeding.

6.24 Admonition is generally appropriate when a lawyer engages in an isolated instance of negligence in complying with a court order or rule, and causes little or no actual or potential injury to a party, or causes little or no actual or potential interference with a legal proceeding.

51. Respondent knowingly violated one or more court orders.

52. Vincler suffered emotional harm from the mental toll of being subjected to unlawful harassment and feeling unsafe.

53. Presumptive sanction for Count 3 is suspension under ABA Standard 6.22.

1 54. ABA Standard 7.0 also applies to Respondent's violations of RPC 8.4(a) and RPC
2 4.4(a) relating to third party Elba Moreira, as charged in Count 4.

3 55. Respondent acted knowingly in attempting to interfere with Moreira's employment
4 and housing. There was potential injury to Moreira and actual injury to Vincler, due to temporarily
5 lost rental income.

6 56. Respondent's conduct also reflects poorly on the profession and diminishes public
7 confidence in the legal system.

8 57. The presumptive sanction for Count 4 is suspension under ABA Standard 7.2.

9 58. The following aggravating factors apply under ABA Standard 9.22:

10 (b) dishonest or selfish motive;

11 (c) a pattern of misconduct;

12 (d) multiple offenses; and

13 (i) substantial experience in the practice of law [admitted in Washington in 2012].

14 59. The following mitigating factors apply under ABA Standard 9.32:

15 (a) absence of a prior disciplinary record;

16 (c) personal or emotional problems;

17 (i) mental disability when:

18 (1) there is medical evidence that the respondent is affected by a ...
19 mental disability;

20 (2) the mental disability caused the misconduct;

21 (3) the respondent's recovery from the ... mental disability is
22 demonstrated by a meaningful and sustained period of successful
23 rehabilitation; and

24 (4) the recovery arrested the misconduct and recurrence of that
misconduct is unlikely; and

(l) remorse.

60. It is an additional mitigating factor that Respondent has agreed to resolve this matter

1 at an early stage of the proceedings.

2 61. While respondent's mitigation is strong and outweighs the aggravating factors,
3 Respondent's misconduct was serious and warrants a suspension of more than six months.

4 **VI. STIPULATED DISCIPLINE**

5 62. The parties stipulate that Respondent shall receive an eight-month suspension.

6 **VII. CONDITIONS OF REINSTATEMENT**

7 63. Reinstatement from suspension is conditioned on payment of costs and expenses, as
8 provided below.

9 64. As an additional condition of reinstatement, Respondent shall, at least 60 days before
10 a request for reinstatement, undergo an independent examination by a fully licensed and
11 accredited clinical psychologist or psychiatrist approved by ODC to evaluate Respondent's fitness
12 to practice law. Dr. Hedrick would be considered a suitable evaluator at a future point in time for
13 a future fitness to practice examination if fully licensed and accredited at the time of said
14 evaluation.

15 65. Respondent shall pay all expenses associated with the examination.

16 66. Respondent shall execute all necessary releases and authorizations to permit the
17 evaluator and disciplinary counsel to obtain full access to all pertinent health care and treatment
18 records for the applicable time period, and to permit the evaluator to release information regarding
19 the evaluation to disciplinary counsel, including a written report of the evaluator's findings,
20 diagnosis, and recommended treatment plan, if any. Respondent shall provide disciplinary
21 counsel with a copy of the releases and authorizations.

22 67. If the evaluator concludes there is reasonable cause to believe that Respondent does
23 not have the mental or physical capacity to practice law, then disciplinary counsel may report to

1 a review committee as provided in ELC 8.2.

2 68. If the evaluator recommends treatment, then Respondent shall undergo treatment with
3 a treatment provider and be subject to probation for a period of 24 months beginning on the date
4 Respondent is reinstated to the practice of law. The conditions of probation are set forth below.

5 69. If the evaluator does not recommend treatment, then Respondent will not be required
6 to undergo treatment and will not be subject to additional probation requiring mental health
7 treatment.

8 **VIII. CONDITIONS OF PROBATION**

9 70. Respondent will be subject to probation for a period of two years beginning when
10 Respondent is reinstated to the practice of law and shall comply with the specific probation terms
11 set forth below:

12 71. If the evaluator recommends treatment, the Respondent shall comply with those
13 treatment recommendations

14 72. Respondent's compliance with these conditions shall be monitored by the Probation
15 Administrator of the Office of Disciplinary Counsel ("Probation Administrator"). Failure to
16 comply with a condition of probation listed herein may be grounds for further disciplinary action
17 under ELC 13.8(b).

18 a. Respondent shall comply with all requirements and recommendations of
19 Respondent's current mental health treatment provider, including but not limited
20 to the completion of any period of in- or out-patient treatment and aftercare and
21 the taking of all prescribed medications.

22 b. Respondent shall also comply with all current and future court ordered evaluation
23 and treatment requirements (from the dissolution and DV cases), if any, and any

1 recommendations of any treating providers, including but not limited to the
2 completion of any period of in- or out-patient treatment and aftercare and the
3 taking of all prescribed medications.

4 c. Respondent shall execute any authorizations needed allowing and directing the
5 treatment provider to take the following actions:

- 6 i. on a monthly basis, send written reports to the Probation Administrator that
7 include the dates of treatment, whether Respondent has been cooperative
8 with treatment, and whether continued treatment is recommended;
- 9 ii. report immediately to the Probation Administrator if Respondent fails to
10 appear for treatment or stops treatment without the provider's agreement
11 and consent prior to either termination of the treatment plan or expiration
12 of the probation period set forth in this stipulation;
- 13 iii. report immediately to the Probation Administrator if Respondent fails to
14 comply with any treatment recommendations of the treatment provider;
- 15 iv. report immediately to the Probation Administrator if Respondent otherwise
16 violates any of the terms or conditions of treatment;
- 17 v. report immediately to the Probation Administrator if the provider will no
18 longer serve as treatment provider to Respondent prior to termination of
19 the treatment plan or expiration of the probation period set forth in this
20 stipulation; and
- 21 vi. report to the Probation Administrator if Respondent successfully
22 completes treatment and is discharged from further treatment.

23 73. Respondent shall provide a copy of the authorization to the Probation Administrator

1 upon execution.

2 74. Respondent is responsible for paying any and all fees, costs, and/or expenses of mental
3 health evaluation and treatment.

4 **IX. COSTS AND EXPENSES**

5 75. In light of Respondent's willingness to resolve this matter by stipulation at an early
6 stage of the proceedings, Respondent shall pay attorney fees and administrative costs of \$750.00
7 in accordance with ELC 13.9(i). The Association will seek a money judgment under ELC 13.9(l)
8 if these costs are not paid within 30 days of approval of this stipulation. Reinstatement from
9 suspension is conditioned on payment of costs.

10 **X. VOLUNTARY AGREEMENT**

11 76. Respondent states that prior to entering into this Stipulation Respondent has consulted
12 independent legal counsel regarding this Stipulation, that Respondent is entering into this
13 Stipulation voluntarily, and that no promises or threats have been made by ODC, the Association,
14 nor by any representative thereof, to induce the Respondent to enter into this Stipulation except
15 as provided herein.

16 77. Once fully executed, this stipulation is a contract governed by the legal principles
17 applicable to contracts, and may not be unilaterally revoked or modified by either party.

18 **XI. LIMITATIONS**

19 78. This Stipulation is a compromise agreement intended to resolve this matter in
20 accordance with the purposes of lawyer discipline while avoiding further proceedings and the
21 expenditure of additional resources by the Respondent and ODC. Both the Respondent lawyer
22 and ODC acknowledge that the result after further proceedings in this matter might differ from
23 the result agreed to herein.

1 79. This Stipulation is not binding upon ODC or the respondent as a statement of all
2 existing facts relating to the professional conduct of the Respondent, and any additional existing
3 facts may be proven in any subsequent disciplinary proceedings.

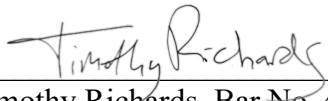
4 80. This Stipulation results from the consideration of various factors by both parties,
5 including the benefits to both by promptly resolving this matter without the time and expense of
6 hearings, Disciplinary Board appeals, and Supreme Court appeals or petitions for review. As
7 such, approval of this Stipulation will not constitute precedent in determining the appropriate
8 sanction to be imposed in other cases; but, if approved, this Stipulation will be admissible in
9 subsequent proceedings against Respondent to the same extent as any other approved Stipulation.

10 81. Under ELC 9.1(d)(4), the Disciplinary Board reviews a stipulation based solely on the
11 record agreed to by the parties. Under ELC 3.1(b), all documents that form the record before the
12 Board for its review become public information on approval of the Stipulation by the Board,
13 unless disclosure is restricted by order or rule of law.

14 82. If this Stipulation is approved by the Disciplinary Board and Supreme Court, it will
15 be followed by the disciplinary action agreed to in this Stipulation. All notices required in the
16 Rules for Enforcement of Lawyer Conduct will be made. Respondent represents that Respondent
17 is only admitted to practice law in the state of Washington.

18 83. If this Stipulation is not approved by the Disciplinary Board and Supreme Court, this
19 Stipulation will have no force or effect, and neither it nor the fact of its execution will be
20 admissible as evidence in the pending disciplinary proceeding, in any subsequent disciplinary
21 proceeding, or in any civil or criminal action.

1 WHEREFORE the undersigned being fully advised, adopt and agree to this Stipulation to
2 Suspension as set forth above.

3 
4 Timothy Richards, Bar No. 44812
5 Respondent

Dated: 08/20/2025

6 
7 Kevin Bank, Bar No. 28935
8 Counsel for Respondent

Dated: 08/26/25

9 
10 Kathy Jo Blake, Bar No. 29235 for
11 Briana Gieri, Bar No. 53970
12 Disciplinary Counsel

Dated: 10/27/25