

TY CLEVENGER,	*	IN THE
	*	CIRCUIT COURT
Petitioner,	*	
	*	FOR
v.	*	ANNE ARUNDEL COUNTY
THE ATTORNEY GRIEVANCE	*	
COMMISSION, et al	*	
	*	
Respondents.	*	Case No.: C-02-CV-16-003620
	*	
* * * * * * * * * * *		

MOTION TO SEAL

Respondents, the Attorney Grievance Commission and the Office of Bar Counsel, through undersigned counsel, pursuant to Rules 19-707, moves that the instant proceedings be sealed for the following reasons:

1. This action arises out of a complaint filed with the Attorney Grievance Commission against three attorneys. *See* Petition for Writ of Mandamus.

2. Pursuant to Rule 19-707(b), Complaints of attorney misconduct are confidential and “may not be disclosed by Bar Counsel, the staff and investigators of the Office of Bar Counsel, any member of the Commission, the staff of the Commission, the Peer Review Committee, *any attorney involved in the proceeding, or, in any civil action or proceeding, by the complainant or an attorney for the complainant...*” (emphasis added). The Rule continues to state that “the records of an investigation by Bar Counsel, including the existence and content of any complaint or response, until Bar Counsel files a petition for disciplinary or remedial action...” are confidential. Rule 19-707(b)(A).

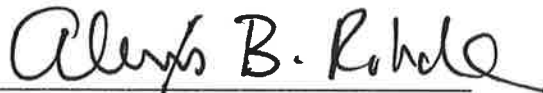
3. Mr. Clevenger's Petition for Writ of Mandamus discloses complaints of attorney misconduct made to the Attorney Grievance Commission. The Petition includes factual allegation describing such complaints and Mr. Clevenger has attached as exhibits, the complaints he filed with the Attorney Grievance Commission. Thus, Mr. Clevenger's Petition violates Rule 19-707.

4. Undersigned counsel informed Mr. Clevenger that his Petition for Writ of Mandamus violates the confidentiality mandated by Rule 19-707 because the Petition was not filed under seal and sought his consent to seal these proceedings, but Mr. Clevenger would not give his consent. (Ex. 1, Email.)

WHEREFORE, for these reasons, Respondents respectfully request that this Court seal these proceedings.

Respectfully submitted,

BRIAN E. FROSH
Attorney General of Maryland




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Attorneys for Respondents

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of May 2017, a copy of the foregoing was served by electronic means via the Court's MDEC system on the persons entitled to receive such notice and mailed, via first-class mail, postage prepaid, to the following:

Ty Clevenger
P.O. Box 20753
Brooklyn, NY 11202-0753
Petitioner Pro Se


ALEXIS B. ROHDE
Assistant Attorney General