OKLAHOMA STATE COURTS NETWORK

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STATE OF OKLAHOMA, ex rel., OKLAHOMA BAR ASSOCIATION, v. KEITH

2026 OK 80

Decided: 11/10/2026

THE SUPREME COURT OF THE STATE OF OKLAHOMA

Cite as: 2026 OK 80, __ P.3d __

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STATE OF OKLAHOMA, ex rel., OKLAHOMA BAR ASSOCIATION, Complainant,

v.

RYAN ALEXANDER KEITH, Respondent.

ORIGINAL PROCEEDING FOR ATTORNEY DISCIPLINE

¶0 Respondent, Ryan Alexander Keith, entered a plea of *nolo contendere* to one misdemeanor count of Threatening an Act of Violence in Tulsa County District Court. Consistent with Rule 7 of the Rules Governing Disciplinary Proceedings, the Oklahoma Bar Association initiated summary disciplinary proceedings against Respondent. The Trial Panel recommended suspension of one year in addition to the Order of Interim Suspension entered by this Court on September 8, 2025, with conditions for reinstatement. The Bar recommends a one year suspension retroactive from the date of interim suspension. After *de novo* review, we hold the appropriate discipline is two years and one day effective from the date of interim suspension.

RESPONDENT IS SUSPENDED FOR TWO YEARS AND ONE DAY EFFECTIVE FROM THE DATE OF INTERIM SUSPENSION, SEPTEMBER 8, 2025;

APPLICATION TO ASSESS COSTS GRANTED.

Gina L. Hendryx, General Counsel, Oklahoma Bar Association, Oklahoma City, Oklahoma, for Complainant.

Sheila J. Naifeh, Naifeh Law Office, Tulsa, Oklahoma, for Respondent Ryan Alexander Keith.

OPINION

DARBY, J.:

¶1 The Oklahoma Bar Association (Bar) initiated this summary disciplinary proceeding against Respondent pursuant to Rule 7 of the Rules Governing Disciplinary Proceedings (RGDP), 5 O.S.2011, ch. 1, app. 1-A, following Respondent's *nolo contendere* plea to misdemeanor Threatening an Act of Violence in violation of title 21, section 1378(B) of the Oklahoma Statutes. The Bar alleged that Respondent's criminal conduct violated RGDP 1.3[1] (conduct bringing discredit upon the legal profession) and Oklahoma Rule of Professional Conduct (ORPC) 8.4(b)[2] (criminal act that reflects adversely on the lawyer's honesty, trustworthiness, or fitness as a lawyer), 5 O.S.2011, ch. 1, app. 3-A. On September 8, 2025, this Court entered an order of immediate interim suspension, and the matter was subsequently referred to the Professional Responsibility Tribunal (Trial Panel) for a hearing to determine whether discipline should be imposed and if so, what is the appropriate discipline. Following the hearing, the Trial Panel recommended that Respondent be suspended from the practice of law for one year, in addition to the

period already served under his interim suspension, subject to conditions for reinstatement concerning continued treatment and participation in Lawyers Helping Lawyers (LHL). The Bar recommends one year suspension retroactive to the date of Respondent's interim suspension, while Respondent urges this Court to impose a public censure.

¶2 The questions before this Court are (1) whether Respondent's criminal conduct demonstrates his unfitness to practice law in violation of ORPC 8.4(b) and constitutes conduct bringing discredit upon the legal profession in violation of RGDP 1.3, and (2) what discipline should be imposed. We find clear and convincing evidence that Respondent violated ORPC 8.4(b) and RGDP 1.3. Considering the nature of Respondent's conduct, together with the aggravating and mitigating circumstances presented in the record, we determine that the appropriate discipline is two years and one day effective from the date of interim suspension, September 8, 2025.

I. Bar Disciplinary Proceedings

¶3 On July 16, 2025, the Bar filed its notice and certified copies of the record relating to Respondent's conviction, as required by Rule 7.2 of the Rules Governing Disciplinary Proceedings. RGDP 7.2. On September 22, 2025, this Court granted Respondent a hearing affording him an opportunity to explain his conduct, and present evidence in mitigation. The Trial Panel conducted an evidentiary hearing on February 12, 2026. At said hearing, the Trial Panel considered whether discipline was warranted and, if so, make a recommendation on the appropriate discipline. Respondent presented exhibits and four witnesses, including himself, and the Bar presented exhibits and two witnesses. The Trial Panel filed its report on April 15, 2026, and the Court received the completed record with all the briefs on June 2, 2026.

¶4 Respondent asks this Court to impose a public censure as discipline for his conduct. The Bar recommends a one year suspension, retroactive to the date of interim suspension. The Trial Panel asserts that suspending Respondent for a period of one year, in addition to the time already served under the interim suspension, is necessary to accomplish the goals of discipline. Additionally, the Trial Panel recommends that the following conditions be imposed on Respondent's reinstatement:

> (1) Continued participation in LHL for a period of two years following reinstatement with an independent sponsor who Respondent has no personal friendship or prior close personal relationship;
>
> (2) Submit to random drug and alcohol testing, including hair follicle testing, at the direction of the OBA and/or LHL Committee, with any noncompliance promptly reported;
>
> (3) Continue psychiatric treatment and therapy as recommended by qualified providers, and upon request, provide verification sufficient to demonstrate ongoing medication adherence and treatment compliance.

II. Standard of Review

¶5 "This Court possesses original, exclusive, and nondelegable jurisdiction over all attorney discipline proceedings in this State." *State ex rel. Okla. Bar Ass'n v. Pistotnik,* 2020 OK 93, ¶ 13, 477 P.3d 376, 380; RGDP 1.1. The Court acts "not for the purpose of punishing an attorney, but to assess continued fitness to practice law and to safeguard the interests of the public, the courts, and the legal profession." *State ex rel. Okla. Bar Ass'n v. Friesen*, 2016 OK 109, ¶ 8, 109 P.3d 1129, 1133. Our review of the evidence is *de novo*, and any factual and legal determinations of the Trial Panel are not binding on this Court, and "any recommendations are merely advisory." *State ex rel. Okla. Bar Ass'n v. Cox*, 2011 OK 73, ¶ 10, 257 P.3d 1005, 1008-09.

¶6 In order to administer discipline evenhandedly, the Court considers prior decisions involving similar misconduct. "The extent of discipline must be decided on a case-by-case basis because each situation will usually involve different transgressions and different mitigating circumstances." *State ex rel. Okla. Bar Ass'n v. Wilcox*, 2014 OK 1, ¶ 48, 318 P.3d 1114, 1128. The judgment and sentence constitute "conclusive evidence of the

commission of the crime upon which the judgment and sentence was based and shall be the basis for discipline." RGDP 7.2. The record consisting of the complaint, transcripts, exhibits, Trial Panel report, briefs, and application to assess costs is sufficient for this Court's *de novo* review and determination of appropriate discipline.

III. Factual Background

¶7 Respondent was admitted to the practice of law in the State of Oklahoma in 2007. During the period relevant to this proceeding, Respondent maintained a solo practice consisting primarily of personal injury cases, business litigation, and real estate matters. Hr'g Tr. 173:19-20. Respondent both worked and lived in the Wright building, located at 115 West 3rd Street, Tulsa, Oklahoma, 74103, which he co-owns with his father. The Wright building housed Respondent's law office and residence, as well as other businesses and occupants. The events underlying Respondent's criminal charge in the present disciplinary proceeding occurred there on May 29, 2024.

¶8 The Wright building is an eight-story red-brick building with an entrance from Third Street and parking areas located behind the building. The Third Street entrance opens into a common area with a hallway that extends through the building. Immediately to the left is a reception area, with Respondent's office located directly behind it. A large plate glass window separates a portion of Respondent's office from the hallway. A stairwell entrance is located across the hallway from the plate glass window. During the May 29th incident, occupants of the Wright building were evacuated through the stairwell in front of Respondent's plate glass window. Respondent's apartment is located near his office and has a separate entrance at the rear of the building. That entrance opens onto a large exterior deck adjacent to the parking areas behind the building.

¶9 Respondent's parents, Roger and Sandra Keith (Mr. and Mrs. Keith), both sought and obtained Emergency Ex Parte Protective Orders against Respondent on May 28, 2024. *See Pet*. *for Protective Ord*., No. PO-2024-1593 (Tulsa Cty. Dist. Ct. May 28, 2024); *see also Pet. for Protective Ord.*, No. PO-2024-1594 (Tulsa Cty. Dist. Ct. May 28, 2024) (respectively). Sandra Keith stated in her petition: "We live in fear for our safety and the safety of our staffs [sic]!" *See Pet*. *for Protective Ord*., No. PO-2024-1594. The record contains allegations of numerous incidents involving Respondent's parents, Mr. and Mrs. Keith; Brandy Gillespie, an employee; his brother, Christian Keith; other employees of the family's businesses; and tenants of the Wright building. Respondent was alleged to have caused or threatened physical harm to Gillespie and members of his family. *See id*. As detailed below, Respondent's escalating conduct and threats created an unsafe environment and placed his family and others in fear for their safety. *See id*.; *see also Pet*. *for Protective Ord*., No. PO-2024-1593.

¶10 Mr. Keith's petition for protective order alleged that, on or about May 22, 2024, Respondent entered an office screaming and threw metal objects at Mr. Keith, causing him injury. It further alleged that Respondent stepped on Mr. Keith's foot and pushed him, causing him to lose his balance, and then shoved Gillespie into a door when she attempted to assist Mr. Keith. *See Pet*. *for Protective Ord*., No. PO-2024-1593. The State also filed two misdemeanor assault and battery charges against Respondent which were later dismissed after prosecution witnesses failed to cooperate. *See Misdemeanor Information*, No. CM-2024-1928 (Tulsa Cty. Dist. Ct. May 30, 2024).

¶11 Both protective order petitions alleged that Respondent broke into a restaurant, threatened to kill his brother Christian, threatened to shoot police if they entered his apartment, and took firearms from his parents' residence. *See Pet*. *for Protective Ord*., No. PO-2024-1594; *see also Pet. for Protective Ord.*, No. PO-2024-1593. Respondent's escalating conduct before May 29th extended beyond these incidents. [3] Respondent had not been served with the protective orders before the May 29th incident. The protective orders were voluntarily dismissed on July 8, 2024.

¶12 The ongoing dispute between Respondent and his parents reportedly arose, at least in part, from Respondent's belief that his parents were siphoning funds from a jointly owned company into a separate entity owned solely by his parents. Resp's Br. in Chief, at 5. Mrs. Keith acknowledged that the family businesses had "always moved money back and forth," but explained that a disagreement arose concerning vehicles owned by Keith & Associates and used by the pharmacy, which was owned by Respondent and Mr. Keith. Hr'g Tr. 131:1-19. According to Mrs. Keith, her husband changed the financial arrangement associated with those vehicles without

Respondent's knowledge, and Respondent later wanted the vehicles transferred to the pharmacy. Hr'g Tr. 130:16-25, 131:1-19. The dispute contributed to the escalating conflict between Respondent and his family, which eventually raised concerns for the safety of those working in the Wright building.

¶13 On May 28, 2024, Mrs. Keith obtained private security for the Wright building. Hr'g Tr. 105:10-14. Tulsa Police Department Officer Katie Sargent was assigned through her private, part-time employment to provide security at the building. Officer Sargent understood her role was to ensure the safety of the building's occupants. Hr'g Tr. 14:9-12. Before beginning the assignment, Officer Sargent was informed that Respondent lived in the building, had reportedly been walking through the building carrying a firearm, had stopped taking his medication, and might be experiencing a manic episode. Hr'g Tr. 16:9-15, 17:1-2. Officer Sargent was also informed that Respondent had been turning the building's elevators on and off, disrupting access to the Wi-Fi network, and manipulating the building's thermostat, making it difficult for the occupants to conduct business. Hr'g Tr. 16:20-25, 17:1-13. Respondent denied engaging in this conduct and testified that others simply assumed he was responsible because he was the de facto building manager. Hr'g Tr. 221:5-17.

¶14 During Officer Sargent's assignment on May 28, 2024, she personally encountered Respondent in Mr. Keith's office and described him as "really agitated" and making "snarky" comments to those present. Hr'g Tr. 17:23, 17:24-25. As Respondent turned to leave Mr. Keith's office, Officer Sargent observed that he was openly carrying a holstered pistol. She testified that Respondent "stopped and he looked at [her] directly and he placed his hand on his pistol, which he had holstered on his side in an open carry manner and he -- he just looked at [her] and he said, 'Good luck.'" Hr'g Tr. 17:23-25, 18:1-5. Officer Sargent testified that the encounter caused her concern. *Id*. Thereafter, while discussing whether to continue the security assignment, Officer Sargent informed the private security company that she believed Respondent's behavior was "unpredictable" and that he had access to numerous weapons. Hr'g Tr. 19:11-25.

¶15 On May 29, 2024, Officer Sargent accompanied Mrs. Keith to Respondent's apartment. Respondent testified that "they were beating on [his] door" and "harassed" him multiple times throughout the day while he was in his apartment. Hr'g Tr. 175:5-15. He further testified "they'd been throwing things at my window, trying to break my window earlier." Hr'g Tr. 219:20-21. The hour and twenty minutes of continuous body camera footage does not depict the conduct Respondent described. Respondent pointed out that the footage did not capture everything that occurred that day, characterizing it as "one-sided." Hr'g Tr. 220:5. Respondent admits that he was not "calm, cool, and collected" and that he was "emotional" "screaming obscenities," but that he was only trying to get them to "leave [him] alone and quit bothering [him]." Hr'g Tr. 218:17-23, 219:13-14.

¶16 At approximately 3:40 p.m., Respondent opened the door leading to his back porch, and the body camera footage depicts the confrontation that immediately followed. The footage contains neither video nor audio of events preceding Respondent's opening of the door. When Respondent stepped outside his apartment, he was holding an unholstered handgun in his right hand and approached his mother. Hr'g Tr. 44:1-25. Upon seeing the handgun, Officer Sargent instructed Mrs. Keith to move away from Respondent. Officer Sargent asked Respondent, "why are you so angry?" Respondent replied, "Fuck you. Get off of my property and maybe I won't be angry. You want me to hang out next to you with a hand cannon? I can do it and that vest won't stop my .300 Weatherby Mag. Good luck." Bar Ex. 1 Video 3 00:01:20-01:33; Hr'g Tr. 27:18-24. Bar Investigator, Steve Jagosh, described the .300 Weatherby Magnum as a caliber "used for hunting large animals, large game." Hr'g Tr. 45:11-12.

¶17 Approximately five minutes later, at 3:45 p.m., the body-camera footage shows Respondent standing behind the picture window in his office, holding a pistol in his right hand and a rifle over his left shoulder. Bar Ex. 1 Video 1 0:00:55-01:05. Respondent then put down the pistol and moved the rifle to his right hand. Bar Ex. 1 Video 1 0:05:00-0:05:15. At one point, Respondent pointed the rifle toward the ceiling and raised his middle finger at Officer Sargent through the picture window. Bar Ex. 1 Video 1 0:05:20-06:58. Officer Sargent testified that it was "apparent to [her] that he was having a mental health episode and [she] found his behavior to be unpredictable." Hr'g Tr. 29:20-22.

¶18 Officer Sargent overheard a radio call that reported an individual at the Wright building pointed a deadly weapon. Upon hearing the call, Officer Sargent informed dispatch that she was already at the location and corrected the report, stating that Respondent had not pointed a weapon. Hr'g Tr. 28:12-25, 29:1-9. The identity of the caller is unknown. Although Respondent had not pointed a firearm, Officer Sargent advised dispatch that she needed additional officers to assist in safely evacuating occupants who wished to leave the building. She explained that the elevators were not operational and that the occupants' only available means of exit was through a stairwell located directly across from Respondent's picture window, where Respondent had just been observed with a scoped rifle and handgun. *Id*. Officer Sargent therefore requested that dispatch "send officers with shields so that [they] could form a line of shields along the picture window while people came down the stairs and left through the front." Hr'g Tr. 30:8-12. She later informed responding officers that Respondent had access to a "multitude of weapons" and had threatened to "shoot [the police] if they made entry into his apartment." Bar Ex. 1 Video 1 0:19:10-19:30. Throughout the encounter, Officer Sargent did not draw her weapon in Respondent's presence. Instead, she attempted to de-escalate the situation, at one point asking Respondent "what [he] was trying to accomplish." Hr'g Tr. 32:19-21; Bar Ex. 1 Video 3 0:14:58-0:15:01. Respondent, for his part, characterized Officer Sargent as appearing "ready to shoot [him]." Hr'g Tr. 218:3-4. The body camera footage, however, does not depict Officer Sargent threatening Respondent or drawing her weapon in his presence. Nor does the record establish that Respondent pointed a firearm at Officer Sargent or Mrs. Keith. Rather, the footage depicts Respondent openly displaying and handling firearms during the confrontation.

¶19 Officer Sargent testified that Respondent "squared up on [her] and reached down and unclipped his holster and told [her] that [they] could do this like Dodge City." Hr'g Tr. 31:20-24. Respondent told Officer Sargent that " [she] might be out of her weight class." Bar Ex. 1 Video 1 0:14:30-40. Respondent's account of this exchange differed from what was captured on the body camera footage. Respondent acknowledged at the hearing that he understood the conduct underlying the charge, testifying that he "squar[ed] up on her" and said "she can do this like Dodge City." Hr'g Tr. 176:22-25, 177:1-2. The body camera audio, however, captures Respondent stating, "we can do this like Dodge City like I give a fuck." Bar Ex. 1 Video 1 0:15:00-15:05. Respondent was charged with felony Threatening an Act of Violence. Sgt. Brown Aff. ¶¶ 6, 8. The charge was later reduced to a misdemeanor.

¶20 As additional officers arrived, they implemented Officer Sargent's plan to safely evacuate the Wright building; officers formed a shield line along the picture window to shield the building's occupants who wished to leave as they evacuated down the stairwell and exited through the front entrance. Bar Ex. 1 Video 1 1:10:58-1:12:15; Hr'g Tr. 48:3-10. The incident resulted in the partial evacuation of the Wright building and the closure of all four surrounding intersections. Hr'g Tr. 48:18-19. Respondent characterized the decision to evacuate the building because of his conduct as "ludicrous." Hr'g Tr. 177:9-11. Respondent further testified that he "didn't even know there were that many officers there or that they had arrived." Hr'g Tr. 178:2-3. The incident ended without physical injury, and Respondent was not arrested on May 29th. Hr'g Tr. 178:4-6.

¶21 On May 30, 2024, a felony charge and an affidavit of probable cause were filed against Respondent, and a warrant was issued for his arrest. *See State of Okla. v. Ryan Alexander Keith*, No. CF-2024-1951 (Tulsa Cty. Dist. Ct. May 30, 2024). Respondent left Oklahoma following the May 29th incident and drove to Las Vegas, Nevada. Respondent testified that he was "taking a car to [his] brother in California" which is why he left. Hr'g Tr. 178:10-12.

¶22 Respondent was later arrested in Las Vegas, Nevada. *In the Matter of the Extradition of Keith, Ryan Alexander*, No. 24-CR-048673 (Clark Cty. June 7, 2024). Eight days elapsed between the issuance of the arrest warrant and Respondent's arrest in Las Vegas, Nevada. Respondent stated that he wanted to turn himself in because he had a warrant and planned to meet with his attorneys the next day, but he was arrested in Las Vegas before he could return. Hr'g Tr. 178:16-25. The record does not establish when Respondent first learned that the warrant for his arrest had been issued. Respondent waived extradition on June 10, 2024, and remained in the custody of the Las Vegas Metropolitan Police Department until June 27, 2024, when he was transported to Tulsa,

Oklahoma. On January 25, 2025, Respondent filed a notice of intent to raise the question of insanity or mental illness at the time of the alleged offense. On March 6, 2025, Respondent was denied for mental health court. *See* Docket, CF-2024-1951.

¶23 On April 21, 2025, Respondent entered a *nolo contendere* plea to one misdemeanor count of Threatening an Act of Violence in violation of title 21, section 1378(B) of the Oklahoma Statutes. The district court deferred judgment and sentencing for a period of three years. As conditions of the deferred sentence, Respondent was ordered to pay a $300.00 fine; pay $150.00 in victim compensation assessments plus costs; complete a mental health assessment; complete a drug and alcohol evaluation; participate in anger management classes; and refrain from possessing firearms. Respondent has satisfied the one time monetary and affirmative conditions imposed as part of his deferred sentence; the three-year deferral and refrainment from possessing firearms remain ongoing.

IV. Discussion

¶24 "A lawyer who has been convicted or has tendered a plea of guilty or nolo contendere. . . in any jurisdiction of a crime which demonstrates such lawyer's unfitness to practice law. . . shall be subject to discipline." RGDP 7.1. Rule 8.4(b) accordingly provides that it is professional misconduct for a lawyer to "commit a criminal act that reflects adversely on the lawyer's honesty, trustworthiness, or fitness as a lawyer in other respects." ORPC 8.4(b). Although not every criminal conviction facially demonstrates an attorney's unfitness to practice law; answerable offenses include "violence, dishonesty, breach of trust, or serious interference with the administration of justice," or a "pattern of repeated offenses, even ones of minor significance when considered separately, can indicate indifference to legal obligation." *State ex rel. Okla. Bar Ass'n v. Armstrong*, 1990 OK 9, ¶ 8, 791 P.2d 815, 818; ORPC 8.4(b), cmt. 2. Respondent violated title 21, section 1378(B), which defines Threatening an Act of Violence as "[a]ny person who shall threaten to perform an act of violence involving or intended to involve serious bodily harm or death of another person shall be guilty of a misdemeanor." 21 O.S. § 1378(B). Therefore, under RGDP 7.1, Respondent's violent conduct is subject to this Court's imposition of discipline. In making this determination, the Court looks to the entirety of the record. *State ex rel. Okla. Bar Ass'n v. Lance*, 2023 OK 98, ¶ 39, 540 P.3d 458, 470.

¶25 "Our primary responsibility in these proceedings is not punishment." *State ex rel. Okla. Bar Ass'n v. Barlean*, 2026 OK 30, ¶ 5, 591 P.3d 221, 224. The Court's task is to "safeguard the public interest, preserve public confidence in the courts, promote the integrity of the judicial system, and deter similar misconduct." *Lance*, 2023 OK 98, ¶ 39, 540 P.3d, at 470. In a summary disciplinary proceeding, this Court evaluates whether the conviction demonstrates the lawyer's unfitness to practice law, and if so, what is the proper discipline to be imposed. *State ex rel. Okla. Bar Ass'n v. Demopolos*, 2015 OK 50, ¶ 8, 352 P.3d 1210, 1214. "Fitness to practice law entails more than the ability to handle cases but involves the continuing qualification of good moral character and respect for the law." *State ex rel. Okla. Bar Ass'n v. Littlefield*, 2023 OK 53, ¶ 7, 529 P.3d 185, 188.

A. Discipline

¶26 This Court considers discipline imposed in similar cases while recognizing that the appropriate discipline is a fact intensive inquiry which depends on the circumstances of each case. *Pistotnik*, 2020 OK 93, ¶ 13, 477 P.3d, at 380-81. This Court has consistently imposed discipline where violence is involved. *Barlean*, 2026 OK 30, ¶ 33, 591 P.3d, at 229. In *Lance*, this Court disbarred an attorney whose dangerous firearm related conduct was affected by an undiagnosed bipolar disorder and methamphetamine addiction. *Lance*, 2023 OK 98, ¶ 42, 540 P.3d, at 471. The attorney barricaded his residence and positioned a loaded shotgun to discharge when an interior door was opened, potentially harming or killing someone. *Id*., ¶ 25, 540 P.3d, at 467. Lance was not arrested or charged because of setting this deadly trap. *Id*., ¶¶ 8-11, 540 P.3d, at 463-64. Lance described his conduct being part of a "nervous breakdown." *Id*., ¶ 35, 540 P.3d, at 469. Although the Court considered Lance's subsequently diagnosed bipolar disorder and substance abuse issues in mitigation, this Court ultimately ordered disbarment. *Id*., ¶ 47, 540 P.3d, at 473. Unlike the present proceeding, *Lance* involved a substantial pattern of criminal and professional misconduct, including multiple criminal offenses, client neglect, unauthorized practice of law, and other professional violations. *Id*.

¶27 Here, Respondent's disciplinary proceeding arises from a single *nolo contendere* plea of misdemeanor threatening an act of violence. The record does not reflect client disregard nor unauthorized practice of law. The aggravated professional misconduct that warranted disbarment in *Lance* is absent here; therefore, disbarment is not warranted.

¶28 In *Conrady*, the attorney, while intoxicated, armed himself with a handgun, broke into the residence of his former girlfriend's new boyfriend, and fired multiple rounds throughout the residence and into vehicles parked outside. *State ex rel. Okla. Bar Ass'n v. Conrady*, 2012 OK 29, ¶ 3, 275 P.3d 133, 135. Although no one was present or physically injured, this Court emphasized that the attorney's reckless conduct "could have easily resulted in death or serious bodily injury." *Id*., ¶ 10, 275 P.3d, at 137. The Court concluded that Conrady's conduct would ordinarily warrant disbarment, but the Court also weighed his more than 30-year unblemished career, his self-report of the charges, his cooperation, his acceptance of responsibility, and his treatment, and imposed a suspension of two years and one day. *Id*., ¶ 14, 275 P.3d, at 139.

¶29 In *Hastings*, the attorney pointed a firearm at his former wife and threatened her life while he was intoxicated, then engaged responding officers in a several hour standoff that ended only when a special operations team deployed tear gas. *State ex rel. Okla. Bar Ass'n v. Hastings*, 2017 OK 43, ¶ 5, 395 P.3d 552, 554. Considering the seriousness of that conduct together with the attorney's PTSD and substance abuse conditions, his sustained recovery, his remorse, and expert testimony that he was fit to practice, the Court imposed a two year suspension from the date of his interim suspension. *Id.*, ¶¶ 8-10, 395 P.3d, at 555-56. And in *Wiehl*, the attorney entered no contest pleas to three felonies and twelve misdemeanors, including three counts of threatening an act of violence, arising from a violent altercation in which he struck, bit, head butted, and spit on officers while threatening to kill them. *State ex rel. Okla. Bar Ass'n v. Wiehl*, 2023 OK 87, ¶¶ 4, 8, 535 P.3d 1268, 1270. Before the incident, Wiehl had taken several prescribed medications for depression, anxiety, and ADHD and had used medical marijuana prescribed for PTSD; hospital testing later revealed a blood-alcohol level of 0.26. *Id*., ¶ 10, 535 P.3d, at 1270. Wiehl believed someone had drugged him with PCP, but the record contained no evidence substantiating that belief, and the hospital did not test for PCP. *Id*. The Court rejected the Trial Panel's recommendation of a one year suspension followed by a two year deferred suspension and instead suspended Wiehl for two years and one day. *Id*., ¶¶ 33-34, 535 P.3d, at 1274-75.

¶30 In this case, Respondent's words and actions presented more than an abstract or conditional threat against Officer Sargent. Although Respondent's conduct did not result in physical injury, his conduct created a substantial risk of escalation and placed his family, the occupants of the Wright building, and responding law enforcement officers in fear of their safety. *Id*., ¶ 31, 535 P.3d, at 1274. This Court has recognized harm to the public when law enforcement officers encounter "a dangerous situation of [a respondent's] making while trying to help him." *Lance*, 2023 OK 98, ¶ 43, 540 P.3d 458, at 471. As in *Conrady*, Respondent's reckless criminal conduct "could have easily resulted in death or serious bodily injury." *Conrady*, 2012 OK 29, ¶ 10, 275 P.3d, at 137.

¶31 Considering Respondent's statements together with the circumstances in which they were made, we conclude that Respondent's criminal conduct reflects adversely upon his fitness to practice law. Respondent's conduct involved the threat of violence and therefore falls within the category of offenses involving "violence" that Comment 2 to Rule 8.4 identifies as indicating a lack of characteristics relevant to the practice of law. ORPC 8.4, cmt. 2. [4] The remaining question is the appropriate discipline to be imposed and if there are any mitigating circumstances surrounding Respondent's misconduct.

¶32 "Only convictions or pleas of guilty or *nolo contendere* are properly before this Court" in a Rule 7 summary disciplinary proceeding. *State ex rel. Okla. Bar Ass'n v. Bethea*, 2024 OK 33, ¶ 17, 549 P.3d 1230, 1237. Accordingly, the sole crime before us is Respondent's misdemeanor offense of threatening an act of violence, the offense upon which his judgment and sentence are based. RGDP 7.2. In *Bethea*, this Court declined to consider an attorney's involvement in an earlier automobile accident six years prior for which he received no citation and which resulted in no criminal charge, conviction, disciplinary investigation, or prior discipline. *Bethea*, 2024 OK 33, ¶ 13, 549 P.3d, at 1235. The Court likewise declined to consider a dismissed charge of leaving the scene of an accident, recognizing that a Rule 7 proceeding is limited to the crime underlying the attorney's conviction. *Id*., ¶¶

16-17, 549 P.3d, at 1236-37. Nevertheless, in determining the appropriate discipline, this Court considered the circumstances and consequences of the attorney's misdemeanor DUI conviction, including the significant injuries inflicted upon innocent third parties. *Id*., ¶ 23, 549 P.3d, at 1238-39. The circumstances here are materially different. The alleged conduct preceding May 29th was neither remote nor unrelated to the misconduct before us. The alleged assault and battery occurred only seven days earlier stemming from the same contention that Respondent's parents were stealing money from him. The protective order petitions described threats and confrontations of the same general character as the conduct underlying Respondent's criminal conviction. Unlike the earlier accident in *Bethea*, these allegations arose in close temporal proximity to Respondent's offense and were addressed during the mitigation hearing. *See State ex rel. Okla. Bar Ass'n v. Wagner*, 2022 OK 13, ¶ 29 n. 21, 503 P.3d 1201, 1209 n. 21 (recognizing that facts supporting summary discipline generally derive from the criminal conviction and the trial panel's mitigation hearing, if one is held).

¶33 We do not treat the dismissed charges or allegations contained in the protective order petitions as established misconduct or independent grounds for discipline. Rather, Respondent's prior awareness of his bipolar disorder, and his management of that condition, bear directly upon the weight afforded his mental health evidence in mitigation. In *Southern*, this Court reasoned that although a disabling medical condition may mitigate misconduct, an attorney's knowledge of his deteriorating condition and failure to seek assistance or take appropriate corrective measures remain relevant considerations in assessing mitigation. *State ex rel. Okla. Bar Ass'n v. Southern*, 2000 OK 88, ¶ 7, 15 P.3d 1, 3 (rejecting the trial panel's recommendation of a private reprimand and imposing public censure where the attorney failed to take appropriate measures despite his awareness of his deteriorating condition). Respondent had known of his bipolar diagnosis since 2021, had previously experienced manic episodes, and had received inpatient treatment during which he learned strategies for recognizing onset mania. Significantly, Respondent testified that he was probably experiencing a manic episode for approximately one or two months preceding the May 29th incident. Hr'g Tr. 204:17-25, 205:1-24. Thus, Respondent's condition did not arise suddenly or without the benefit of prior experience. Despite his familiarity with the condition and its warning signs, the record does not establish that Respondent took meaningful measures to address his deteriorating condition before the May 29th incident. Accordingly, while we do not impose discipline for conduct outside of Respondent's plea, his prior knowledge of his condition, the duration of his reported manic episode, and his efforts to manage his symptoms bear upon the weight afforded his mental health evidence in mitigation.

¶34 The harm extended beyond those directly involved. As this Court recognized in *Conrady*, violent criminal conduct by an attorney may also bring embarrassment and discredit upon the legal profession. *Conrady*, 2012 OK 29, ¶ 18, 275 P.3d, at 140. Respondent's conduct, threatening a law enforcement officer while armed with multiple firearms, and precipitating a substantial police response in downtown Tulsa, likewise brought discredit upon the profession and undermined the public confidence attorneys are expected to preserve. *State ex rel Okla. Bar Ass'n v. Thompson*, 2008 OK 89, ¶ 8, 194 P.3d 1281, 1284 (recognizing that sufficiently objectionable criminal conduct "undermine[s] public confidence and trust in the dignity and integrity of the judiciary and the legal profession"). Respondent's conduct therefore caused not only a substantial potential for physical harm, but the type of discredit to the legal profession contemplated by Rule 1.3 RGDP.

B. Mitigation

¶35 In the weeks preceding May 29, 2024, Respondent was allegedly experiencing a manic episode and had discontinued medication prescribed for his bipolar disorder. Hr'g Tr., 175:1-6, 204:17-25, 205:1-19. Respondent testified that he had been weaned off his medication under the care of his psychiatric provider, Sabrina Conley, and he believed that discontinuing his medication contributed to his manic episode. Hr'g Tr., 174:8-25, 175:1-4. The record contains no testimony from Conley or other evidence corroborating Respondent's account that he was medically directed to discontinue his medication. Thus, although the record establishes that Respondent had discontinued his medication and was experiencing what he described as a manic episode, the record does not independently establish that he discontinued his medication at the direction of a medical provider.

¶36 This Court considers "all of [respondent's] conduct in light [of] the evidence submitted" to determine the appropriate discipline. *Demopolos*, 2015 OK 50, ¶ 8, 352 P.3d, at 1214. Mitigating circumstances may be considered in evaluating an attorney's conduct and assessing the appropriate discipline. *State ex rel. Okla. Bar Ass'n v. Taylor*, 2000 OK 35, ¶ 33, 4 P.3d 1242, 1255. This Court does not overlook Respondent's repeated attempts to minimize the seriousness of his conduct and its consequences. We have previously considered an attorney's efforts to minimize serious misconduct in determining the appropriate discipline. *Lance*, 2023 OK 98, ¶¶ 44, 48, 540 P.3d, at 471; *Conrady*, 2012 OK 29, ¶ 10, 275 P.3d, at 137. Here, Respondent attributed his behavior to others "harass[ing]" him, maintained that Officer Sargent appeared "ready to shoot [him]," and characterized the evacuation of the Wright building because of his conduct as "ludicrous." Yet the body camera footage depicts Respondent openly displaying and handling firearms, telling Officer Sargent that her protective vest would not stop his .300 Weatherby Magnum, and stating that they could "do this like Dodge City." The resulting law enforcement response required officers to form a shield line to evacuate some occupants past Respondent's picture window and close the surrounding intersections. The fact that no one was physically injured does not diminish the seriousness of Respondent's conduct or the potential harm it created. *Conrady*, 2012 OK 29, ¶ 10, 275 P.3d, at 137 (recognizing that the absence of physical injury does not diminish the potential for death or serious bodily injury and rejecting the attorney's attempt to minimize his conduct). Nor does Respondent's professed lack of awareness of the scope of the law enforcement response diminish the consequences of his actions. His continued characterization of the incident as the product of others' conduct, rather than his own, indicates his lack of acceptance of responsibility and affects the weight afforded his mitigating evidence. *Lance*, 2023 OK 98, ¶ 44, 48, 540 P.3d, at 471-72.

¶37 Emotional or psychological disability can lessen a lawyer's ethical culpability, but it does not immunize the lawyer from discipline needed to protect the public and the integrity of the legal profession. *State ex rel. Okla. Bar Ass'n v. Giger*, 2003 OK 61, ¶ 39, 72 P.3d 27, 39. When a mental disorder is offered in mitigation, the lawyer must show a causal connection between the condition and the misconduct. *Ibid*. We therefore consider both the relationship between Respondent's bipolar disorder and the conduct underlying this proceeding and the evidence concerning his subsequent treatment, acceptance of responsibility, management of that condition, and present fitness to practice law. We note that Respondent did not raise "present mental incompetence" under RGDP 10.4 and this proceeding is not subject to confidentiality under RGDP 10.12.

¶38 Here, Dr. Dale Switzer testified on Respondent's behalf explaining Respondent's willingness to continue treatment for the diagnosis of bipolar disorder. In so testifying, however, Dr. Switzer had no specific knowledge of Respondent's misconduct. When asked if Respondent told him about the May 29th incident giving rise to this proceeding Dr. Switzer stated he did not ask any details of what happened. Hr'g Tr. 150:9-14. Therefore, the Court disagrees with the Bar. The Bar is convinced that Respondent "clearly suffered from a manic episode which caused him to engage in the criminal conduct," but without sufficient evidence from Dr. Switzer, or another source, this Court cannot conclude that Respondent was suffering from a manic episode at the time of his offense. Bar's Br. in Chief, at 16. Dr. Switzer lacked any personal knowledge of the misconduct; thus, there is no sufficient basis for this Court to consider whether or not there was a causal relationship between Respondent's bipolar disorder and his misconduct.

¶39 Similarly, in *Giger* the attorney failed to establish a causal link between this "perceived mental condition and the misconduct." *Giger*, 2023 OK 61, ¶ 39, 72 P.3d, at 39. In that case, Giger failed to "provide medical substantiation that he suffers from depression." *Id*. "The court can and must protect the public from a lawyer who suffers from undefined psychological problems that call into serious question his continued fitness to practice law." *Id*. In contrast, in *McCoy*, the attorney "presented medical proof from both his general practitioner and his psychiatrist that he suffers from various physical ailments along with depression and attention deficit disorder present now and *during the time of the misconduct*." *State ex rel. Okla. Bar Ass'n v. McCoy*, 2010 OK 67, ¶ 26, 240 P.3d 675, 685 (emphasis added). Likewise, in *Southern*, the attorney and his physician presented evidence that an undiagnosed medical condition caused the symptoms underlying his misconduct, persuading the Trial Panel that his neglect was primarily attributable to his medical condition rather than willful neglect. *Southern*, 2000

OK 88, ¶¶ 6-7, 15 P.3d, at 3. The Court considered that evidence compelling mitigation. *Id*. Unlike *McCoy* and *Southern*, the medical evidence presented here does not connect Respondent's diagnosed condition to the particular misconduct underlying this proceeding.

¶40 The absence of sufficient evidence establishing the causal connection required in *Giger*, however, does not end our discussion of Respondent's subsequent treatment and rehabilitation. In assessing mitigation, this Court considers "whether a lawyer's conduct has changed following medical and psychological treatment." *Demopolos*, 2015 OK 50, ¶ 18, 352 P.3d, at 1216.

¶41 Respondent has presented substantial evidence of treatment and rehabilitation since the May 29, 2024 incident. On July 2, 2024, Respondent entered inpatient treatment at the Tulsa Center for Behavioral Health and successfully completed the eight-day program. He thereafter voluntarily entered Mountain Springs Mental Health in Colorado, where he remained for several weeks before transitioning to outpatient treatment. Respondent continues treatment with Dr. Switzer, whom he sees every three months, and a therapist. Respondent testified that after initially seeing his therapist weekly, those visits were reduced to once every six months. He continues to take medication for depression and mood stabilization associated with his bipolar disorder and testified that he takes his medication daily and has not missed a dose.

¶42 Respondent has also taken additional steps toward rehabilitation. He meets with his probation officer monthly in compliance with the conditions of his three year deferred sentence and has completed court ordered anger management, substance-abuse screening and evaluation, and a risk assessment. Respondent has paid the fees and costs associated with the criminal charge. He also submitted a Rule 9.1 affidavit reflecting that he concluded his pending client matters. Respondent has submitted to drug testing at the request of the Bar and entered into a two year contract with LHL, with his friend Stephen Lee serving as his sponsor. Lee testified, however, that he has not requested Respondent's medical documentation or independent drug testing. Respondent has had one prior grievance filed against him, which did not result in discipline.

¶43 The record therefore demonstrates that Respondent recognizes the need to manage his diagnosed condition and has undertaken substantial efforts toward treatment. His voluntary inpatient treatment, continued medical care, adherence to medication, and participation in LHL weigh in mitigation. Compliance with treatment and court-ordered conditions, however, does not alone establish rehabilitation. *Demopolos*, 2015 OK 50, ¶ 22, 352 P.3d, at 1217. Rather, such compliance is one consideration in determining whether treatment has produced "an actual change in the lawyer's attitude and conduct that the lawyer's treatment is designed to foster." *Id*. Respondent's efforts toward rehabilitation must also be considered in light of his prior knowledge and experience with his condition. Respondent had known of his bipolar diagnosis since 2021. Unlike an attorney confronting an undiagnosed condition, Respondent was familiar with his disorder and the importance of recognizing its symptoms. Yet, in the weeks preceding May 29, 2024, Respondent had discontinued his prescribed medication, and the record does not independently establish that he did so at the direction of his medical provider. Although Respondent's subsequent treatment demonstrates meaningful efforts toward rehabilitation, his prior awareness of his condition remains relevant in his ability to recognize and manage its symptoms and the weight afforded his mitigating evidence.

¶44 Respondent's acceptance of responsibility presents another important consideration. Respondent testified to his remorse and embarrassment for his actions and the disrepute his conduct brought upon the legal profession. He acknowledged the seriousness of his conduct and its public consequences, including the resulting media attention. At other points in his testimony, however, Respondent attributed his agitation to Officer Sargent, who he described as annoying and stressful, and maintained that he was being harassed. Moreover, when Respondent was asked whether there was anything else he did that would be considered a criminal act, Respondent responded by stating "I can see both sides of why it could be a crime and why it's also not a crime in freedom of speech." Hr'g Tr. 222:20-25. A lawyer's lack of acceptance of responsibility and attribution of his professional difficulties to others is a warning sign this Court considers in assessing discipline. *Giger*, 2003 OK 61, ¶ 37, 72

P.3d, at 39. Similarly, in *Zannotti*, the Court concluded that the attorney's attempts to shift responsibility for his conduct to the victim undermined his testimony of remorse. *State ex rel. Okla. Bar Ass'n v. Zannotti*, 2014 OK 25, ¶ 19, 330 P.3d 11, 16.

¶45 Our decision in *Hastings* further illustrates the significance of rehabilitation coupled with genuine remorse. There, Hastings expressed genuine regret and remorse for his conduct and its impact on the legal profession, sought treatment, demonstrated a commitment to recovery, submitted to random drug and alcohol testing with negative results, and faced no additional allegations following the isolated incident. *Hastings*, 2017 OK 43, ¶¶ 9-10, 395 P.3d, at 555-56. Respondent likewise has undertaken substantial treatment and rehabilitation since the May 2024 incident. Unlike the unequivocal acceptance of responsibility described in *Hastings*, however, Respondent's expressions of remorse are tempered by testimony attributing his agitation and conduct, at least in part, to the actions of Officer Sargent.

¶46 We therefore give weight to Respondent's substantial efforts toward treatment and rehabilitation, while recognizing that the evidence does not establish a causal connection between his bipolar disorder and the underlying misconduct and raises some concern as to whether Respondent has fully accepted responsibility for his actions. These considerations inform, but do not alone determine, the appropriate sanction. Ultimately, it remains this Court's duty to determine the appropriate discipline based upon the "facts and circumstances of the case." *Demopolos*, 2015 OK 50, ¶ 29, 352 P.3d, at 1219.

¶47 Balancing the seriousness of Respondent's conduct against the mitigating circumstances, we conclude that a two year and one day suspension is the appropriate discipline. A two year and one day suspension protects the public, the courts, and the legal profession while appropriately accounting for Respondent's demonstrated treatment and rehabilitation. The suspension shall run for two years and one day effective from the date of interim suspension, September 8, 2025.

V. Conclusion

¶48 Respondent's misconduct warrants suspension. Considering the seriousness of his conduct together with the substantial evidence of treatment and rehabilitation, we conclude that a two year and one day suspension is appropriate. This discipline adequately protects the public, the courts, and the legal profession while accounting for the mitigating circumstances presented. Respondent is suspended from the practice of law for two years and one day effective from the date of interim suspension. Because Respondent will be suspended for a period exceeding two years, reinstatement is not automatic. *See* RGDP 11.1. Upon applying for reinstatement, Respondent must satisfy all requirements of RGDP 11, and present stronger proof of his qualifications than a person seeking admission for the first time. RGDP 11.4. Costs are assessed against Respondent in the amount of $2,895.43, to be paid within ninety (90) days of the date this Opinion becomes final.

RESPONDENT IS SUSPENDED FOR TWO YEARS AND ONE DAY EFFECTIVE FROM THE DATE OF INTERIM SUSPENSION, SEPTEMBER 8, 2025; APPLICATION TO ASSESS COSTS GRANTED.

ALL JUSTICES CONCUR.

FOOTNOTES

DARBY, J.:

[1] "The commission by any lawyer of any act contrary to prescribed standards of conduct, whether in the course of his professional capacity, or otherwise, which act would reasonably be found to bring discredit upon the legal profession, shall be grounds for disciplinary action, whether or not the act is a felony or misdemeanor, or a crime at all. Conviction in a criminal proceeding is not a condition precedent to the imposition of discipline." RGDP 1.3.

[2] "It is professional misconduct for a lawyer to: (b) commit a criminal act that reflects adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects." ORPC 8.4(b).

[3] Both protective order petitions also alleged that Respondent:

Threatened to kill his girlfriend and her parents when she went to the Wright building to move her possessions.

- Threatened his parents if they did not sign over ownership of the companies;
- Threatened to blow up and burn down the Wright building;
- Created a toxic work environment which scared employees so much they left;
- Firmly believed that everyone is stealing from him;
- Was in a fight in March, in California, which resulted in the other person suffering from stab wounds and left Respondent with two black eyes and stitches;
- Harassed employees of elevator company who have either quit or were fired by Respondent;
- Threatened employees of elevator company;
- Went into girlfriend's gallery in the Wright building and started destroying items and the police were called;
- Showed his girlfriend which knife he could use to kill her;
- Received complaints from tenants on the 5th and 6th floors that Respondent was roaming the halls drunk;
- Attended a professional meeting and tried to bribe nurses to use the pharmacy in the building;
- Arrested in Plano, Texas for disturbing the peace and possession of an open container;
- Had an altercation with his girlfriend where he had a gun on the dresser; and

See Pet. for Protective Ord., No. PO-2024-1594; *see also Pet. for Protective Ord.*, No. PO-2024-1593.

[4] "Although a lawyer is personally answerable to the entire criminal law, a lawyer should be professionally answerable only for offenses that indicate lack of those characteristics relevant to the practice of law. Offenses involving violence, dishonesty, breach of trust, or serious interference with the administration of justice are in that category." ORPC 8.4(b), cmt. 2.

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Oklahoma Supreme Court Cases

Cite	Name	Level
1990 OK 9, 791 P.2d 815,	State ex rel. Oklahoma Bar Ass'n v. Armstrong	Discussed
2000 OK 88, 15 P.3d 1, 71 OBJ 2910,	STATE EX REL OKLAHOMA BAR ASSN. v. SOUTHERN	Discussed at Length
2003 OK 61, 72 P.3d 27,	STATE ex rel. OKLAHOMA BAR ASSOCIATION v. GIGER	Discussed at Length
2008 OK 89, 194 P.3d 1281,	STATE ex rel. OKLAHOMA BAR ASSOCIATION v. THOMPSON	Discussed
2010 OK 67, 240 P.3d 675,	STATE ex rel. OKLAHOMA BAR ASSOCIATION v. McCOY	Discussed
2011 OK 73, 257 P.3d 1005,	STATE ex rel. OKLAHOMA BAR ASSOCIATION v. COX	Discussed
2012 OK 29, 275 P.3d 133,	STATE ex rel. OKLAHOMA BAR ASSOCIATION v. CONRADY	Discussed at Length
2014 OK 1, 318 P.3d 1114,	STATE ex rel. OKLAHOMA BAR ASSOCIATION v. WILCOX	Discussed
2014 OK 25, 330 P.3d 11,	STATE ex rel. OKLAHOMA BAR ASSOCIATION v. ZANNOTTI	Discussed
2015 OK 50, 352 P.3d 1210,	STATE ex rel. OKLAHOMA BAR ASSOCIATION v. DEMOPOLOS	Discussed at Length
2016 OK 109, 384 P.3d 1129,	STATE ex rel. OKLAHOMA BAR ASSOCIATION v. FRIESEN	Cited

Cite	Name	Level
2017 OK 43, 395 P.3d 552,	STATE ex rel. OKLAHOMA BAR ASSOCIATION v. HASTINGS	Discussed at Length
2020 OK 93, 477 P.3d 376,	STATE ex rel. OKLAHOMA BAR ASSOCIATION v. PISTONIK	Discussed at Length
2022 OK 13, 503 P.3d 1201,	STATE ex rel. OKLAHOMA BAR ASSOCIATION v. WAGNER	Discussed
2000 OK 35, 4 P.3d 1242, 71 OBJ 1163,	State ex. rel. Oklahoma Bar Assn. v. Taylor	Discussed
2023 OK 53, 529 P.3d 185,	STATE ex rel. OKLAHOMA BAR ASSOCIATION v. LITTLEFIELD	Discussed
2023 OK 61, 531 P.3d 114,	TIB-THE INDEPENDENT BANKERS BANK v. GOERKE	Cited
2023 OK 87, 535 P.3d 1268,	STATE ex rel. OKLAHOMA BAR ASSOCIATION v. WIEHL	Discussed
2023 OK 98, 540 P.3d 458,	STATE ex rel. OKLAHOMA BAR ASSOCIATION v. LANCE	Discussed at Length
2024 OK 33, 549 P.3d 1230,	STATE ex rel. OKLAHOMA BAR ASSOCIATION v. BETHEA	Discussed at Length
2026 OK 30,	STATE OF OKLAHOMA ex rel. OBA v. KELLY JOHN BARLEAN	Discussed

Title 21. Crimes and Punishments

Cite	Name	Level
21 O.S. 1378,	Punishment for Planning or Threatening Violent Act	Cited