

BEFORE THE HEARING BOARD  
OF THE  
ILLINOIS ATTORNEY REGISTRATION  
AND  
DISCIPLINARY COMMISSION

FILED  
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ARDC Clerk

In the Matter of:

GREGORY ALLEN ROYAL,  
  
Attorney-Respondent,  
  
No. 6300723.

Commission No. 2025PR00024

COMPLAINT

Lea S. Gutierrez, Administrator of the Attorney Registration and Disciplinary Commission, by her attorney, Scott Renfroe, pursuant to Supreme Court Rule 753(b), complains of Respondent, Gregory Allen Royal, who was licensed to practice law in the State of Illinois on November 5, 2009, and alleges that Respondent has engaged in the following conduct that subjects him to discipline pursuant to Supreme Court Rule 770:

COUNT I  
*(Threatening and Harassing Conduct)*

1. At all times alleged in this complaint, there was in effect a criminal statute in Virginia, Chapter 18, Section 2-60 of the Virginia Compiled Statutes, which made it a class six felony offense to threaten death or bodily injury to a person by knowingly communicating in a writing, including an electronically transmitted communication, a threat to kill or do bodily injury to a person, and the threat places such person in reasonable apprehension of death or bodily injury.

2. At all times alleged in this complaint, there was in effect a criminal statute in Virginia, Chapter 18, Section 2-152.7:1 of the Virginia Compiled Statutes, which made it a class one misdemeanor offense to use a computer to engage in harassment by communicating obscene,

vulgar, profane, lewd, lascivious, or indecent language.

3. In September 2014, the United States Patent and Trademark Office (“the Agency”) removed Respondent from his position as a probationary patent examiner. Respondent challenged the removal by filing an employment complaint against the Agency with the Equal Employment Opportunity Commission (“EEOC”), and on October 5, 2016, an administrative law judge dismissed Respondent’s request for a hearing and remanded his complaint to the Agency for the issuance of a final agency decision. The judge took that action as a sanction for what she determined had been Respondent’s failure to comply with her orders or to respond to the Agency’s requests for information.

4. The Agency issued its final agency decision on December 2, 2016, finding that Respondent’s separation from employment had not been based on discrimination, retaliation, or harassment. Respondent appealed that decision to the EEOC’s Office of Federal Operations, which later concluded that Respondent’s appeal of the Agency’s decision had been untimely. Respondent unsuccessfully continued to litigate his claims against the Agency before the federal district court for the Eastern District of Virginia and the United States Court of Appeals for the Fourth Circuit.

5. Beginning in 2019, Respondent initiated contact with the Agency’s Office of Equal Employment Opportunity and Diversity, complaining that he continued to be the subject of discrimination because the Agency had not selected him for a patent examiner position as vacancies for that position arose. The Office of Equal Employment Opportunity and Diversity referred Respondent’s complaint to the Department of Commerce’s Office of Civil Rights for investigation to avoid a potential conflict of interest, and Respondent’s claims were eventually assigned to an administrative law judge.

6. In the course of Respondent's continuing pursuit of his various litigation and employment claims against the Agency, he learned that one of the attorneys representing the Agency was "Victim One," a Black woman. On June 15, 2021, Victim One filed a motion before the EEOC seeking sanctions against Respondent based on the contention that Respondent's prosecution of his claims included frivolous filings and involved disrespectful and abusive behavior directed at the administrative law judge assigned to the case, Agency counsel, and Agency witnesses.

7. Between 2019 and June 22, 2023, both Victim One and "Victim Two," who was one of the attorneys involved in the investigation of Respondent's EEOC complaint, had received over 500 emails from Respondent degrading them and using severely vulgar language. Victim Two had never met Respondent or spoken to Respondent and generally disregarded Respondent's emails until early 2023, when, due to the increasingly threatening tone of Respondent's emails, Victim Two installed a security system at her home.

8. On June 22, 2023, Respondent sent an email to multiple officials, including Victim One, Victim Two, and "Victim Three," Victim One's supervisor, a woman who is of Asian heritage, stating:

**The BLACK N\*\*\*\*\*S [multiple names, including Victim One] and their RACIST CRIMINAL FELON WHITE TRAILER TRASH C\*\*\*S [multiple names, including Victim Two], and SECRETARY OF COMMERCE GINA RAIMONDO and RACIST CRIMINAL FELON SLANTY-EYED YELLOW ASIAN C\*\*\*S [multiple names, including Victim Three] need to be dragged out of their federal offices lined up and SHOT IN THEIR F\*\*\*ING HEADS! ALL ARE IMMEDIATE AND ABSOLUTE DANGERS TO THE AMERICAN PUBLIC AND THE U.S. CONSTITUTION. ALL NEED TO BE LINED UP AND SHOT IN THEIR RACIST F\*\*\*ING HEADS!** (Bold and all capital letters in original; obscenities in original not redacted)

9. On July 10, 2023, Respondent sent Victim Two an email which stated that **“[VICTIM TWO] IS A FILTY RACIST WHITE TRASH CRIMINAL FELON C\*\*\* WHO SHOULD BE DRAGGED OUT AND SHOT IN HER RACIST HEAD.”** (Bold and all capital letters in original; obscenities in original not redacted) On July 22, 2023, Respondent sent Victim Two an extensive email, which, in addition to containing vulgar language, stated that **“One day I will go to Virginia to protest against the WHITE RACIST C\*\*\* [VICTIM TWO]....[VICTIM TWO] NEEDS TO BE HUNG AND LYNCHED ON A TREE AND SHOT IN HER RACIST F\*\*\*ING HEAD.”** (Bold and all capital letters in original; obscenities in original not redacted) Because Victim Two felt that Respondent’s language was a direct personal threat to her safety, she sent Respondent a cease-and-desist communication by email.

10. On August 1, 2023, Respondent sent an email to Victim Two referring to her as a **“FILTHY RACIST CRIMINAL C\*\*\*,” “SATAN’S-SEMEN-SWALLOWING WHORE,” “STANKY OVERSIZE-HOLE C\*\*\* WHORE,”** and a **“STINKY C\*\*\* WITH A GRAND CANYON SIZED VAGINA”** and stating that **“THE FILTHY RACIST BITCH [VICTIM TWO] IS A CRIMINAL FELON....THE FILTHY SATAN-C\*\*\*-S\*\*\*ING WHORE IS GUILTY!”** (Bold and all capital letters in original; obscenities in original not redacted)

11. On August 20, 2023, Victim Two reported Respondent’s communications to her to the Arlington County Police Department.

12. On August 23, 2023, Magistrate Bruce Charles Adam held a probable cause hearing with Victim Two and then issued a felony warrant for Respondent’s arrest for the charge of knowingly communicating in a writing a threat to kill or do bodily injury of Victim Two, in violation of Virginia Compiled Statutes section 18.2-60.

13. On or about August 7, 2024, Respondent sent an email message to Victims One, Two, Three, and multiple other current and former officials associated with the Agency, in which Respondent stated that he knew where Victims One, Two, and Three, and seven other officials lived and either providing their home addresses or stating that he knew their home addresses. Respondent's message stated, in part: "OUR 10-YEAR ANNIVERSARY IS APPROACHING-FIGHTING SINCE SEPTEMBER 4, 2014 -AND I MUST PLAN SOMETHING SPECIAL FOR ALL OF THE RACIST AND CRIMINAL FELON TRASH INVOLVED IN *ROYAL VERSUS DEPARTMENT OF COMMERCE, ET AL....* **EVENTUALLY, MY FIGHT AGAINST A RACIST, UNLAWFUL, AND OPPRESSIVE FEDERAL GOVERNMENT AGENCY WILL CATCH A SPARK!**" (Bold, all capital letters, and italics in original)

Respondent further stated:

In 2013-2014, when you all foolishly believed that you were omnipotent and could engage in your conspiracy of racism, violations of Title VII and the U.S. Constitution, and criminal felonies against me, I'll bet you never considered for a second that I would oppose you and protest you for 10 years-and I got many more years left in me too! Are you all still laughing?.... And my opposition and protest will continue until I find federal employment.

Respondent concluded the message by advising the recipients that "**YOU ARE NOT UNTOUCHABLE!**" (Bold and all capital letters in original)

14. Based in part on Respondent's inclusion of Victim One's home address in his August 7, 2024, email, on his threat to continue protesting what he considered their improper handling of his disputes with the Agency, including his purported plan for "something special," on his statement that the various officials were "not untouchable," and on Respondent's previous mailing of a similarly profane and confrontational letter to her neighbors (alleged more specifically in Count II, *infra*), on September 9, 2024, Victim One determined that the email

message was a direct threat to her safety and reported the communications to the Fairfax County Police Department.

15. On September 10, 2024, police officers prepared and submitted a report to Magistrate Rougier-Chapman, who on that same date issued a misdemeanor warrant for Respondent's arrest for harassment by computer in violation of Virginia Compiled Statutes section 18.2-152.7:1.

16. By reason of the conduct described above, Respondent has engaged in the following misconduct:

- a. using means that have no substantial purpose other than to embarrass, delay, or burden a third person, by conduct including sending the messages described above, in violation of Rule 4.4(a) of the Illinois Rules of Professional Conduct (2010);
- b. committing criminal acts that reflect adversely on his honesty, trustworthiness, or fitness as a lawyer in other respects, by engaging in the crime of communicating written threats of death or bodily injury to a person, in violation of Virginia Compiled Statutes 18.2-60, and harassment by computer, in violation of Virginia Compiled Statutes 18.2-152.7:1, all in violation of Rule 8.4(b) of the Illinois Rules of Professional Conduct (2010); and
- c. engaging in conduct that is prejudicial to the administration of justice, by conduct including sending the letters and email messages described above to Agency employees, including his opposing counsel and potential witnesses in his ongoing disputes with the Agency, in violation of Rule 8.4(d) of the Illinois Rules of Professional Conduct (2010).

## COUNT II

*(Harassing and Discriminatory Conduct-August 22, 2024, Letters to Victim One's Neighbors)*

17. The Administrator realleges paragraphs one through fifteen of Count I, above.

18. As of August 22, 2024, Respondent continued to be engaged in a dispute involving his former employment with the Agency, in that three of his appeals (numbers 20-56-

50, 20-56-80, and 21-56-18) had been briefed and submitted to the EEOC's Office of Federal Operations and were awaiting decision. Victim One and Victim Three continued their employment with the Agency during that time.

19. On or about August 22, 2024, Respondent searched the internet for Victim One's home address, then located the addresses of others in her neighborhood in suburban Washington, D.C. At that time, Respondent also wrote and mailed letters to several of Victim One's neighbors that contained Victim One's home address and Victim One and Victim Three's uspto.gov email addresses, and made the following statements about the women:

- That Victim One was an “**EXTREMELY UNETHICAL INDECENT UNDIGNIFIED SLAVISH CRIMINAL FELON BLACK PORCH N\*\*\*\*\* MONKEY,**” and “**A TRIFILING IMMORAL DEI AUNT JEMIMA N\*\*\*\*\* PUPPET**”;
- That Victim One “willfully and gleefully played ‘**STEPIN FETCHIT**’ for her **EXTREMELY RACIST UGLY UNETHICAL IMMORAL SLANT-EYED SICK YELLOW ASIAN C\*\*\* ‘MASSA’**”, Victim Three; and
- “My opinion is that **TRIFLING IMMORAL DEI AUNT JEMIMA N\*\*\*\*\* PUPPET [VICTIM ONE]** mother may have been **IGNORANT GHETTO TRASH** or a **CRACK WHORE** because she - obviously – did not teach her **SLAVISH DEI AUNT JEMIMA N\*\*\*\*\*** daughter [VICTIM ONE]: **No matter what happens...always maintain your integrity and dignity; they can never take that away from you.**” (Obscenities and ethnic and misogynistic slurs not redacted in original; bold, all capital letters, italics, and underlining in original)

20. When Respondent sent the letters to Victim One's neighbors, described in paragraph 19, above, his conduct was related to the practice of law because it related to his continuing disputes with the Agency, and the letters referred to two of the attorneys (Victims One and Three) who had represented the Agency in that dispute, and the letters included Victims One and Three's work email addresses.

21. Respondent knew or should have known that the letters were harassing or discriminatory because the language he used was abusive and harassing and was also discriminatory based on Victims One and Three's race, color, ancestry, sex, national origin, or ethnicity.

22. By reason of the conduct described above, Respondent has engaged in the following misconduct:

- a. using means that have no substantial purpose other than to embarrass, delay, or burden a third person, by conduct including sending the letters described above, in violation of Rule 4.4(a) of the Illinois Rules of Professional Conduct (2010);
- b. engaging in conduct that is prejudicial to the administration of justice, by conduct including sending the letters described above to Victim One's neighbors, in violation of Rule 8.4(d) of the Illinois Rules of Professional Conduct (2010); and
- c. engaging in conduct in the practice of law that he knew or reasonably should have known was harassment or discrimination based on Victim One and Victim Three's race, color, ancestry, sex, national origin, or ethnicity, by conduct including sending the August 22, 2024 letters to Victim One's neighbors in which he referred to the women's involvement in his ongoing dispute with the Agency and described them in language that was discriminatory and harassing, in violation of Rule 8.4(j) of the Illinois Rules of Professional Conduct (as amended May 30, 2024, effective July 1, 2024).



