

Boulder County Court Boulder County Justice Center P.O. Box 4249 1777 Sixth Street Boulder, Colorado 80306-4249	▲ Court Use Only ▲
Steve Douglas Gartin - Plaintiff v. Thomas C. Miller - Defendant	Case Number: _____  Division _____
Plaintiff, Pro se: <b>Steve Douglas Gartin</b> <b>2363 ½ South Decatur Street</b> <b>Denver, Colorado 80219</b> <a href="mailto:sheriffsteve@justice.com">sheriffsteve@justice.com</a>	CourtRoom: _____
<b>AMENDED COMPLAINT FOR BREACH OF CONTRACT</b>	

**Comes now, Steve Gartin**, the Plaintiff, pro se, and complains against the Defendant, Thomas Miller as follows:

1. Steve Douglas Gartin is a natural person and at all times pertinent herein is a resident of the State of Colorado and of Denver County.
2. Thomas Charles Miller is a natural person and at all times pertinent herein is a resident of the State of Colorado and Boulder County.
3. The amount in controversy is under \$15,000 and the Defendant resides in Boulder County, therefore venue is proper in Boulder County Court.
4. Defendant is an attorney B.A.R. registration # 22652. Social Security number 522-74-3951 Aliases: Thomas C. Phillips, Doc Miller, Thomas Doc Miller, Tom Miller, Tom Doc Miller, Doc Phillips, Thomas C. Miller.
5. Plaintiff brings this complaint pursuant to the civil tort for Breach of Contract.
6. On or about September 2002, Defendant Miller and Plaintiff entered into a verbal contract between the parties, the essence of which is that Plaintiff would provide computer services, computer education, database management, document management, legal research, office management, website development and legal support services to Defendant in return for 10% of the gross income of the legal practice known as Thomas C. "Doc" Miller, esquire d.b.a. Doc's Law.
7. Defendant Miller committed to codifying this contract in writing.
8. Defendant Miller failed, neglected or refused to commit this verbal contract to writing.
9. Plaintiff substantially performed on the conditions of the contract from September 2002 until March of 2004.

10. Defendant Miller grossed over \$100,000 during this period.
11. Defendant Miller remunerated Plaintiff \$2295.00 during this period.
12. Defendant Miller has failed, neglected or refused to pay Plaintiff approximately \$7705.00.
13. Plaintiff hereby demands payment of \$7705.00 forthwith, or in the alternative demands a trial by jury in order to subpoena Federal and State tax records and to issue interrogatives to determine the facts relating to the exact amount in which Defendant is in default and to establish the elements of willful and wanton, deliberate and fraudulent conduct of the Defendant.
14. Damages sought include:
  1. Direct Damages
  2. Compensatory damages according to proof;
  3. Punitive damages;
  4. Exemplary damages;
  5. Interest as allowed by law;
  6. Costs of suit; and
  7. Such other and further relief as this court may deem just and proper.

Wherefore, the Plaintiff, prays for judgment against the Defendant as shall be awarded by a jury for the Breach of Contract by the Defendant, and a sum certain judgment of \$7800 should the Defendant default.

Respectfully submitted in good faith,

**Friday, May 14, 2004**



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Steve Douglas Gartin – Pro-Se  
720-404-1812

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**CERTIFICATE OF SERVICE BY UNITED STATES POSTAL SERVICE**

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I, Steve D. Gartin, undersigned, do hereby certify that a true and correct copy of the foregoing, Petition to Withdraw Guilty Plea was personally deposited in the U.S. Postal Service on Friday, May 14, 2004 addressed to the following parties:

**Boulder County Court**

Boulder County Justice Center  
P.O. Box 4249  
1777 Sixth Street  
Boulder, Colorado 80306-4249

Thomas C. Miller  
1026 Lincoln Place  
Boulder, Colorado 80302

Kevin Massaro  
Wells Fargo Center  
1700 Lincoln Street  
Suite 2222  
Denver, Colorado 80203-4522  
303-866-9400 ext. 421  
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[www.brega-winters.com](http://www.brega-winters.com)

*Steve Gartin*

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Steve Gartin