



STATE OF MARYLAND

BEFORE THE COMMISSION ON JUDICIAL DISABILITIES

IN THE MATTER OF

*

*

CJD 2016-083

JUDGE PAUL G. GOETZKE

*

RESPONSE OF JUDGE GOETZKE

The Honorable Paul G. Goetzke ("Judge Goetzke") through undersigned counsel and pursuant Md. Rule 18-407(c) files this response to the charges in the above referenced case.

General Response

1. Judge Goetzke denies that he committed sanctionable conduct as defined in Md. Rule 18-401(k).
2. Judge Goetzke denies that he violated the Maryland Code of Judicial Conduct as promulgated in Md. Rule 18-100 *et seq.*
3. Judge Goetzke respectfully requests that the Commission dismiss the charges filed by Investigative Counsel and terminate the proceeding.

Specific Response to Facts

1. Judge Goetzke denies that he "was generally unprofessional in his demeanor and interactions with Ms. Warren in the legal proceedings at issue" as alleged in paragraph 2 of the charges.
2. Judge Goetzke denies that he "engaged in a persistent course of conduct against Ms. Warren, including but not limited to, his chastising her and badgering her about the complaint that she filed with the Commission; his subjecting her to *ex parte* questioning on the record for

almost one hour; and his using a demeaning and sarcastic tone” as alleged in paragraph 4 of the charges.

3. Judge Goetzke denies that he “was disrespectful and unprofessional to Ms. Warren during the July 29, 2016 hearing in the Myers case, and [that] his tone was rude, condescending, and sarcastic” as alleged in paragraph 7 of the charges.

4. Judge Goetzke denies that he violated Rules 18-101.1; 18-101.2; 18-102.2; 18-102.3; 18-102.8; 18-102.9; and 18-100.4 as alleged in paragraph 5 of the charges.

November 8, 2017

William C. Brennan, Jr.
Brennan, McKenna, Mitchell & Shay
6305 Ivy Lane, Suite 700
Greenbelt, MD 20770
301.474.0044
wbrennan@brennanmckenna.com

Attorney for Judge Paul G. Goetzke

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response was hand-delivered this 8th day of November, 2017 to the following individuals:

Carol A. Crawford, Investigative Counsel
Tanya C. Bernstein, Deputy Assistant Investigative Counsel
Derek A. Bayne, Assistant Investigative Counsel
Commission on Judicial Disabilities
Post Office Box 340
Linthicum Heights, MD 21090-0340

William C. Brennan, Jr. *u*