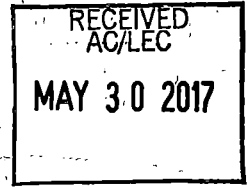


IN THE SUPREME COURT OF MISSOURI
EN BANC



IN RE:)
KATHERINE ANNE DIERDORF,)
(MBE: # 63782))

Official Address:)
2828 Zuni St. #424)
Denver, CO 80211)

File No. DHP-17-012

Respondent,)

and)

IN RE:)
AMBRY NICHOLE SCHUESSLER,)
(MBE: #66214))

Official Address:)
222 S. Meramec Ave., Ste. 300)
St. Louis, MO 63105)

File No. DHP-17-013

Respondent,)

and)

IN RE:)
CAROLINE ANNE RUTLEDGE,)
(MBE: #68364))

Official Address:)
38 Midpark Lane)
St. Louis, MO 63124)

File No. DHP-17-014

Respondent.)

INFORMATION

COMMON ALLEGATIONS

COMES NOW the Chief Disciplinary Counsel under Authority of the Supreme Court of Missouri, and charges:

1. Informant is the Chief Disciplinary Counsel appointed by the Supreme Court of Missouri.

2. In July 2014, Katherine Anne Dierdorf and Ambry Nichole Schuessler were Assistant Circuit Attorneys for the St. Louis City Office of Circuit Attorney (“OCA”). Caroline Anne Rutledge was a Rule 13-certified student intern from St. Louis University Law School working at the OCA.

3. Dierdorf, Schuessler, and Rutledge worked, socialized, and texted with each other.

4. Dierdorf, Schuessler, and Rutledge also worked, socialized, and texted with Assistant Circuit Attorney Bliss Worrell and were aware of Worrell’s close, personal relationship with St. Louis City Police Department Detective Thomas Carroll.

5. On Tuesday evening, July 22, 2014, Dierdorf, Rutledge, and Worrell attended a St. Louis Cardinal’s baseball game together. During the evening, Worrell learned from Carroll that Carroll’s daughter (Meghan) had her car broken into and credit card stolen. The police had arrested a suspect at Ballpark Village. During the evening or by the next morning, each of the Respondents became aware of this situation.

6. Sometime in the late evening or in the early hours of Wednesday July 23, Carroll drove to the police station, where the suspect was being detained, and assaulted

the suspect. That assault started the chain of events that led to the disciplinary proceedings before this Court.

7. Respondents learned of the details of Carroll's assault and Worrell's subsequent charging of the suspect as further described below.

8. On Wednesday morning, July 23, 2014, Dierdorf arrived at work and went into her office, where Rutledge was present. Another Assistant Circuit Attorney, Vannah Shaw, was either in the office or nearby outside. Worrell came into Dierdorf's office and discussed the situation regarding Meghan's stolen credit card. Worrell told Dierdorf and Rutledge that Carroll physically assaulted the suspect.

9. After Worrell left Dierdorf's office, Worrell, Dierdorf, and Rutledge participated in a group text, agreeing that they needed to be careful talking about such things within ear shot of another Assistant Circuit Attorney, Vannah Shaw, who takes her role as a "true public servant" very seriously.

10. Later, on Wednesday, Dierdorf was in Schuessler's office. Worrell came in while talking on her cell phone with Carroll. Worrell put the conversation on speakerphone and Carroll described how he assaulted the suspect, including throwing him against the wall, breaking his ribs, and putting a pistol down his throat. Schuessler made the slur: "I bet that's not the first big black thing he has had in his mouth." Carroll also said the suspect asked to see a supervisor, and a sergeant came in who then also punched the suspect. Dierdorf claims to have left Schuessler's office before hearing the entirety of the speakerphone conversation.

11. On Thursday morning, July 24, 2014, Dierdorf arrived at work and went into her office, where Rutledge was again present. Worrell came in and repeated the details of the assault Carroll described during Wednesday's speakerphone conversation. Dierdorf asked what happened with the case, and Worrell said she had helped issue the warrant for criminal charges on Wednesday afternoon against the suspect.

12. Following the meeting in Dierdorf's office, Dierdorf went into Schuessler's office, where Assistant Circuit Attorney Lauren Collins was present. Dierdorf shared the details of the assault for the benefit of Collins. Dierdorf also announced that Worrell "messed up." According to Dierdorf, Worrell went into the Warrant Office to help issue charges against the suspect, and a false charge of attempting to flee from custody was included in order to explain away the injuries the suspect had received during the assault.

13. Schuessler stated that they all could get into trouble for just knowing about this. Dierdorf responded that they wouldn't because no one would find out.

14. Following the conversation with Dierdorf, Schuessler and Collins discussed between themselves what to do with this information. Schuessler and Collins accessed the OCA computer system to confirm that charges had been filed against the suspect. Schuessler accompanied Collins to Supervisor Pippa Barrett's office, and Collins told Barrett that "trumped up" charges may have been filed in a case in the OCA.

15. The OCA and Internal Affairs from the St. Louis City Police Department began investigations, and soon thereafter, the FBI and United States Attorney's Office began a joint investigation.

16. Months later, Carroll and Worrell each entered into a Guilty Plea Agreement in federal court and were found guilty as follows:

- (1) Carroll, one count of Deprivation of Rights, in violation of 18 U.S.C. § 242, when he deprived a restrained arrestee in custody of his Fourth Amendment Right not to be subjected to unreasonable seizure (Case No. 4:16CR00148 HEA), and
- (2) Worrell, one count of Misprision of a Felony, in violation of 18 U.S.C. § 4, for failing to notify authorities of the commission of a felony and taking an affirmative step to conceal the felony. (Case No. 4:15CR00486 HEA).

17. On August 10, 2016, having been advised of Worrell's conviction, the Supreme Court of Missouri disbarred Worrell (SC95871).

18. While the Respondents did not participate in the issuing of charges against the suspect, each of the Respondents failed to disclose their knowledge of Carroll's assault and Worrell's involvement in the issuing of charges, and each was untruthful at different times in the sequence of events to either the OCA supervisors, the Internal Affairs officers, or to the FBI and the United States Attorney's Office.

COUNT I: KATHERINE ANNE DIERDORF ALLEGATIONS

19. Informant repeats and realleges paragraphs 1-18 as set out above.

20. Informant has determined, pursuant to Rule 5.11, that probable cause exists to believe that Respondent, Katherine Anne Dierdorf, is guilty of professional misconduct.

21. Dierdorf became licensed as an attorney in Missouri on September 14, 2011, and her Missouri Bar Number is 63782. Dierdorf's current membership status with the Missouri Bar is "inactive."

22. The address designated in Dierdorf's most recent registration with the Missouri Bar is 2828 Zuni St. #424 Denver, CO 80211.

23. In the afternoon on Thursday July 24, 2014, Dierdorf was called into a meeting with her Supervisor, Pippa Barrett, the Chief Warrant Prosecutor, Ed Postawko, and the Chief Felony Prosecutor, Beth Orwick and asked about what she knew concerning the assault and the issuing of charges.

24. Dierdorf denied knowing details of the assault, the issuing of charges, or having spoken in detail to Worrell or other circuit attorneys in the office about the matters.

25. Following the meeting with the OCA supervisors, Dierdorf encountered Schuessler in the hallway and said that she [Dierdorf] did not say anything when interviewed and warned Schuessler not to say anything either.

26. Later, on Thursday, Dierdorf texted Rutledge that: "If I [Dierdorf] go down for this, I will literally freak out. I did absolutely nothing."

27. After the work day on Thursday, Dierdorf drove Worrell home. Dierdorf overheard Worrell talking to Carroll on the phone discussing how it was that others had found out about Carroll's assault.

28. On Friday, July 25, 2014, Internal Affairs officers from the St. Louis Police Department came to the OCA, and with the OCA supervisors present, interviewed

Dierdorf. Dierdorf repeated her denials from her interview on Thursday. Dierdorf was specifically asked whether she spoke to any of the other circuit attorneys about Carroll's assault or Worrell's involvement in the filing of charges. Dierdorf denied any such conversations.

29. On August 11, 2014, Dierdorf was interviewed by the FBI and the Assistant United States Attorney. Dierdorf did not disclose her first conversation with Worrell on Wednesday July 23, when Worrell came into her office and told Dierdorf and Rutledge that Carroll had assaulted the suspect. Also, Dierdorf did not disclose that on her drive home on Thursday July 24, she had overheard Worrell talking to Carroll on the phone discussing how it was that others had found out about the assault.

30. On July 29, 2015, Dierdorf testified in front of the federal grand jury and admitted she was untruthful with the OCA supervisors, the Internal Affairs officers, the FBI, and the Assistant United States Attorney.

31. Based on the above, Respondent is guilty of professional misconduct as a result of violating the following Rules of Professional Conduct:

a. Rule 4-8.4(c), by engaging in conduct involving dishonesty, deceit or misrepresentation, as follows:

1. In the first instance, failing to report to the OCA supervisors her knowledge of the potentially illegal conduct of Carroll's assault and Worrell's involvement in issuing charges, and

2. By failing to disclose information and lying to the OCA supervisors, the Internal Affairs officers, the FBI, and the Assistant United States Attorney, regarding her knowledge of Carroll's assault and Worrell's involvement in issuing charges; and
 3. By urging Schuessler not to cooperate with the OCA investigation;
- b. Rule 4-1.13 (Organization as Client), as follows:
1. In the first instance, failing to report to the OCA supervisors her knowledge of the potentially illegal conduct of Carroll's assault and Worrell's involvement in issuing charges; and
 2. By failing to disclose information and lying to the OCA supervisors, the Internal Affairs officers, the FBI, and the Assistant United States Attorney, regarding her knowledge of Carroll's assault and Worrell's involvement in issuing charges; and
 3. By urging Schuessler not to cooperate with the OCA investigation;
- c. Rule 4-8.4(d), by engaging in conduct prejudicial to the administration of justice.

WHEREFORE, Informant prays that a decision be issued finding that Respondent has committed professional misconduct as alleged in this Information, that Respondent be disciplined in accordance with Rule 5, and that costs be assessed against Respondent.

COUNT II: AMBRY NICHOLE SCHUESSLER

32. Informant repeats and realleges paragraphs 1-18 as set out above.

33. Informant has determined, pursuant to Rule 5.11, that probable cause exists to believe that Respondent, Ambry Nichole Schuessler, is guilty of professional misconduct.

34. Schuessler became licensed as an attorney in Missouri on September 18, 2013, and her Missouri Bar Number is 66214.

35. On Thursday July 24, 2014, Schuessler was called into a meeting with her supervisor, Pippa Barrett, the Chief Warrant Prosecutor, Ed Postawko, and Chief Felony Prosecutor, Beth Orwick and was asked about what she knew concerning the police assault and the issuing of charges.

36. Schuessler denied being able to clearly hear Carroll during the speakerphone conversation on Wednesday and did not reveal the slur she had made regarding Carroll's putting his pistol down the suspect's throat.

37. On Friday, July 25, 2014, Internal Affairs officers from the St. Louis Police Department, with OCA supervisors present, interviewed Schuessler. Schuessler again denied being able to clearly hear Carroll during the speakerphone conversation on Wednesday and did not reveal the slur she had made regarding Carroll's putting his pistol down the suspect's throat.

38. On August 13, 2014, Schuessler was interviewed by the FBI and the Assistant United States Attorney. Again, Schuessler failed to fully disclose what she had learned during Carroll's speakerphone conversation regarding the assault, but in addition, attributed to Carroll the slur she had made regarding Carroll's putting his pistol down the suspect's throat.

39. In a subsequent interview on September 4, 2014 with the FBI and the Assistant United States Attorney, Schuessler admitted she was evasive and untruthful in her August 13th interview and acknowledged it was she, not Carroll, who had made the slur regarding Carroll's putting his pistol down the suspect's throat.

40. On July 27, 2016, Schuessler was called as a prosecution witness at the federal court sentencing hearing of Carroll. The main issue at the sentencing hearing was whether Carroll used a firearm during the assault of the suspect. Carroll's attorney used Schuessler's previous false statements to impeach Schuessler's credibility.

41. Based on the above, Respondent is guilty of professional misconduct as a result of violating the following Rules of Professional Conduct:

a. Rule 4-8.4(c), by engaging in conduct involving dishonesty, deceit or misrepresentation, as follows:

1. Failing to disclose information and lying to the OCA supervisors, Internal Affairs officers, the FBI, and the Assistant United States Attorney regarding her knowledge of Carroll's assault; and

2. Making a racist and homophobic slur in the OCA in response to a report of possible illegal police conduct, which itself is a violation of Rule 8.4(g) (Bias or Prejudice in the Judicial System); and
 3. Falsely attributing the racist and homophobic slur to Carroll during her interview with the FBI and the Assistant United States Attorney; and
- b. Rule 4-8.4(d), by engaging in conduct prejudicial to the administration of justice.

WHEREFORE, Informant prays that a decision be issued finding that Respondent has committed professional misconduct as alleged in this Information, that Respondent be disciplined in accordance with Rule 5, and that costs be assessed against Respondent.

COUNT III: CAROLINE ANNE RUTLEDGE

42. Informant repeats and realleges paragraphs 1-18 as set out above.
43. Informant has determined, pursuant to Rule 5.11, that probable cause exists to believe that Respondent, Caroline Anne Rutledge, is guilty of professional misconduct.
44. As a Rule 13-certified attorney, Rutledge was bound by Missouri Supreme Court Rule 4, the Rules of Professional Conduct.
45. Rutledge became licensed as an attorney in Missouri on September 16, 2015, and her Missouri Bar Number is 68364.
46. The address designated in Rutledge's most recent registration with the Missouri Bar is 38 Midpark Lane St. Louis, MO 63124.

47. During the day on Thursday July 24, 2014, following the conversation in Dierdorf's office with Worrell, Rutledge went into Worrell's office and overheard Worrell talking on the phone and referencing the words: "Internal Affairs." Rutledge believed Worrell was talking with Carroll at the time. Rutledge left the area, not wanting to hear anything more.

48. Later, on Thursday evening, Rutledge texted Dierdorf: "Next question, if they determine Bliss knew it was a false police report, can any charges be brought against Bliss/the cops? I hope she understands if we distance ourselves."

49. On Friday July 25, 2014, Internal Affairs officers from the St. Louis Police Department, with OCA supervisors present, interviewed Rutledge.

50. When asked by the Internal Affairs officers about any conversations in her presence or information she had concerning the suspect, Rutledge failed to disclose the full details of her two conversations with Worrell, who, with Dierdorf present, discussed the details of Carroll's assault and Worrell's involvement in issuing criminal charges.

51. Rutledge did describe to the Internal Affairs officers the telephone call she had overheard between Carroll and Worrell, when one of them said the words: "Internal Affairs". Rutledge said she quickly left the area to avoid hearing anything more, which she credited to her father's advice as a former law enforcement officer.

52. On August 19, 2014, the FBI and the Assistant United States Attorney interviewed Rutledge.

53. During her interview, Rutledge admitted that when she was interviewed by the Internal Affairs officers she falsely denied knowing about the details of Carroll's assault and Worrell's involvement in issuing criminal charges against the suspect.

54. Further, Rutledge admitted she was untruthful with the Internal Affairs officers when she said she was not listening when Worrell and Dierdorf were talking and had paid little attention.

55. Further, Rutledge admitted to falsely telling the Internal Affairs officers that she knew to stay away from anything having to do with Internal Affairs because her father was an ex-law enforcement officer.

56. Based on the above, Respondent is guilty of professional misconduct as a result of violating the following Rules of Professional Conduct:

a. Rule 4-8.4(c), by engaging in conduct involving dishonesty, deceit or misrepresentation, in that:


1. In the first instance, failing to report to OCA supervisors her knowledge of the potentially illegal conduct regarding Carroll's assault and Worrell's involvement in issuing charges; and
2. Failing to disclose information and lying to the OCA supervisors and the Internal Affairs officers regarding her knowledge of Carroll's assault and Worrell's involvement in issuing charges;

b. Rule 4-1.13 (Organization as Client) as follows:

1. In the first instance, failing to report to OCA supervisors her knowledge of the potentially illegal conduct regarding Carroll's assault and Worrell's involvement in issuing charges; and
 2. Failing to disclose information and lying to the OCA supervisors and the Internal Affairs officers regarding her knowledge of Carroll's assault and Worrell's involvement in issuing charges;
- c. Rule 4-8.4(d), by engaging in conduct prejudicial to the administration of justice.

WHEREFORE, Informant prays that a decision be issued finding that Respondent has committed professional misconduct as alleged in this Information, that Respondent be disciplined in accordance with Rule 5, and that costs be assessed against Respondent.

Respectfully submitted,



ALAN D. PRATZEL #291418
Chief Disciplinary Counsel



SAM PHILLIPS #30458
Deputy Chief Disciplinary Counsel

//s//

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ATTORNEY FOR INFORMANT

CERTIFICATE OF SERVICE

I hereby certify that this Information was e-mailed and by U.S. Mail, postage prepaid, Certified Mail, Restricted Delivery, Return Receipt Requested to the Respondent; and by email or U.S. Mail, First Class to the others listed this 25th day of May, 2017:

Missouri Supreme Court Advisory Committee
c/o Ms. Melinda J. Bentley, Legal Ethics Counsel
3335 American Avenue
Jefferson City, MO 65109

Mr. Alan D. Pratzel, Chief Disciplinary Counsel
Mr. Sam Phillips, Deputy Chief Disciplinary Counsel
Office of Chief Disciplinary Counsel
3327 American Avenue
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//s//
