

The Florida Bar
651 E. Jefferson Street
Tallahassee, Florida 32399-2300
Toll Free 1-866-352-0707 (ACAP)

PLEASE READ THESE IMPORTANT INSTRUCTIONS

Please read all instructions carefully before completing the inquiry/complaint form. If the form is not properly completed it may be returned for correction. **You may submit up to a total of 25 pages including the inquiry/complaint form and exhibits.** You may indicate that additional evidence or exhibits are available upon request. Please legibly print or type in black ink only.

PLEASE NOTE: The Florida Bar cannot intervene on your behalf in a civil or criminal case, nor can we give you legal advice. We do not have jurisdiction to consider complaints against judges and many elected officials. Our lawyer regulation department considers whether an attorney has violated our rules of conduct and determines whether, under the totality of the circumstances, The Florida Bar will seek discipline against the attorney. If your inquiry/complaint is closed, you will receive a written explanation of the reasons for the closure.

PART ONE – Complainant Information. You must give your name, address, email address and phone number. If you have already contacted ACAP, please indicate your ACAP reference number in the space provided. If your inquiry/complaint pertains to a matter currently in litigation, please indicate that in the space provided.

PART TWO – Attorney Information. You must give the name, Bar Number, address, email and phone number of the subject attorney. The Bar Number and address of the attorney are particularly important as many lawyers have the same or similar names. You may find the attorney's Bar Number and contact information by going to www.floridabar.org and searching under Find A Lawyer. **List only one attorney per form (you may copy this form if you need additional copies). The Florida Bar processes inquiry/complaint forms only against individual attorneys, not against law firms or offices.**

PART THREE – Facts/Allegations. On a separate sheet, describe the conduct of the attorney by including the details, in chronological order, and supplying dates where possible. Please be aware that simply alleging conclusions without setting out facts that support those conclusions will result in the need for the Bar to ask you for additional information and may delay a disposition of your complaint. Please number any additional pages you attach. If you have letters, documents or other evidence, you should attach photocopies (**DO NOT SEND ORIGINAL DOCUMENTS**). It is helpful if you mark your attachments as exhibits (A, B, C, etc.), and refer to them in your description of your complaint. **Please do not bind, staple, tab or index your documents. You may underline but DO NOT HIGHLIGHT documents.** Highlighting will obscure the underlying text when scanned into our computers. **Please do not attach media such as audio files, thumb/flash drives, CDs, oversized documents, or photographs. Do not submit .jpeg, .mpeg, .mp3 or links to online materials including Dropbox.** We cannot process any media that cannot be scanned into the electronic record. It is not necessary to include a copy of these instructions.

PART FOUR – Witnesses. Your inquiry/complaint will be considered even if there are no witnesses. If you have witnesses, attach an additional sheet with the name, address and telephone number for each witness, and include a brief description of the facts about which that witness would testify. If you do not attach a list of witnesses, we will presume that you have no witnesses, other than the attorney and yourself.

PART FIVE – Signature. You must sign the form and certify under penalty of perjury that your allegations are true. Unsworn complaints are not considered. **Submit the inquiry/complaint form to our office via U.S. Mail at:**

The Florida Bar
Attn.: ACAP
651 East Jefferson Street
Tallahassee, Florida 32399-2300

Or via email at:

ACAPIntake@floridabar.org

IMPORTANT NOTICE FOR COMPLAINANTS AND RESPONDENT-ATTORNEYS

MAILING AND EMAILING INSTRUCTIONS

Materials Received That Do Not Comply With These Instructions May Be Returned Or Not Otherwise Incorporated Into The File

The Florida Bar converts its disciplinary files to electronic media. All submissions are scanned into an electronic record and hard copies are discarded. To help ensure the timely processing of inquiries/complaints, responses and rebuttals, please review the following instructions prior to providing your submission.

1. Please limit your submission to **no more than 25 pages including exhibits**. If you have additional documents or material available, please reference the documents and/or materials in your written submission as available upon request. Should The Florida Bar need to obtain copies of any such documents and/or materials, a subsequent request will be sent to you.
2. **Please do not bind, staple, tab or index your documents. You may underline but do not highlight documents under any circumstances. Please do not submit materials in color.** When documents are scanned in our disciplinary files, highlighting and color will obscure the underlying text.
3. **Please do not attach media such as audio tapes, thumb/flash drives, CDs, or photographs.** We cannot process any media which cannot be scanned into the electronic record. Do not submit .jpeg, .mpeg, .mp3, or links to online materials including Dropbox.
4. **Please do not submit your original supporting documents.** All documents will be discarded after scanning and we will not be able to return any originals submitted to our office. The only original documents that should be provided to our office are the inquiry/complaint form, response and certificate of disclosure.
5. **Whether you are a complainant or a respondent-attorney, please do not submit confidential or privileged information.** Documents submitted to our office become public record. (Respondent-attorneys may wish to consult Rule 4-1.6 (e) of the Rules Regulating The Florida Bar.) Confidential/privileged information should be redacted. Such information includes, but is not limited to, bank account numbers, social security numbers, credit card account numbers, medical records, dependency matters, termination of parental rights, guardian ad litem records, child abuse records, adoption records, documents containing names of minor children, original birth and death certificates, biometric data such as fingerprints, Baker Act records, grand jury records, and juvenile delinquency records. If information of this nature is important to your submission, please describe the nature of the information and indicate that it is available upon request. Bar counsel will contact you to make appropriate arrangements for the protection of any such information (to the extent permitted by law) as part of the investigation of the complaint.
6. The review of inquiries and complaints is governed by Standing Board Policy 15.75. If the inquiry/complaint is closed by bar counsel, the complainant may request a review of the closure in accordance with the policy.
7. **Please provide your submission only one time. Do not submit duplicates via email, facsimile transmission or by any other means. Do not include these instructions. Respondent-attorneys do not need to include a copy of the complaint.**

Please be aware that materials received that do not meet these instructions may be returned or not otherwise incorporated into the file. Thank you for your consideration in this respect.

The Florida Bar Inquiry/Complaint Form

**STOP - PLEASE DOWNLOAD THIS FORM TO YOUR COMPUTER BEFORE
FILLING IT OUT.**

PART ONE (See Page 1, PART ONE – Complainant Information.):

Your Name: _____

Organization: _____

Address: _____

City, State, Zip Code: _____

Phone: _____

Email: _____

ACAP Reference No.: _____

Does this complaint pertain to a matter currently in litigation? Yes _____ No _____

PART TWO (See Page 1, PART TWO – Attorney Information.):

Attorney's Name: _____ Florida Bar No. _____

Address: _____

City, State, Zip Code: _____

Phone: _____

**PART THREE (See Page 1, PART THREE – Facts/Allegations.): The specific thing or things I
am complaining about are: (attach additional sheet).**

**PART FOUR (See Page 1, PART FOUR – Witnesses.): The witnesses in support of my
allegations are: (attach additional sheet).**

PART FIVE (See Page 1, PART FIVE – Acknowledge Oath and Signature.):

☐

YOU MUST PLACE YOUR MARK IN THE BOX ACKNOWLEDGING THE OATH AND
YOU MUST SIGN YOUR FULL NAME BELOW.

**Under penalties of perjury, I declare that the foregoing facts are true, correct and
complete.**

Print Name

Signature

Date

*Having trouble? Download the form and open the document in Adobe Acrobat™.

Your Name:

Address:

City, State, Zip:

Date:

The Florida Bar

Attn.: ACAP

651 East Jefferson Street

Tallahassee, Florida 32399-2300

ACAPIntake@floridabar.org

To the Office of Disciplinary Counsel Regarding:

- **Name:** Attorney General of the United States, Pamela Jo Bondi
- **School of attendance:** Stetson University College of Law
- **Admitted:** 06/24/1991
- **Bar Number:** Florida Bar #886440
- **Notations of Violations noted by Citizen:** See below

Thank you for taking the time to review this official complaint.

The United States Constitution guarantees several fundamental rights and protections to individuals and states. These guarantees primarily involve individual freedoms, protections against government overreach, and the structure of the federal government's relationship with each of the individual states.

The constitutional guarantee of the right to counsel, primarily through the Sixth Amendment, creates several expectations for attorneys representing clients. This includes the right to representation, whether hired or court-appointed, the right to effective assistance of counsel, and the right to consult with counsel and prepare a defense. Attorneys are expected to be competent, prompt, and diligent in their representation.

Attorneys have a crucial ethical duty to uphold constitutional guarantees, ensuring that their clients' rights are protected and the integrity of the legal system is maintained. This includes

zealously advocating for clients within the bounds of the law, challenging unconstitutional laws or practices, and providing effective legal representation, even in controversial cases.

To receive their bar license, an attorney swears an Oath to the Constitution of the United States of America first and foremost, and is expected to be competent and diligent in their understanding of the law, and they can be held to account for not upholding their Oath if they knowingly, and willingly violate, or refuse to uphold the Constitution as written.

The "**freedom of due process**" refers to the constitutional guarantee, enshrined in the Fifth and Fourteenth Amendments, that no person shall be deprived of life, liberty, or property without due process of law, ensuring fair legal procedures and protections against arbitrary government action.

Additionally, "**due process**" generally refers to fair procedures and the right to be heard before the government can take action that affects a person's life, liberty, or property.

The Due Process Clause of the Fourteenth Amendment is a key source of civil liberties, which are protections against government actions. The Equal Protection Clause of the Fourteenth Amendment provides the basis for civil rights, which are protections against discrimination. The concept of due process is rooted in the Fifth and Fourteenth Amendments of the United States Constitution.

The Fifth Amendment restricts the **federal government**, stating that no person shall be "deprived of life, liberty, or property, without due process of law".

The Fourteenth Amendment extends this protection to **state governments**, ensuring that no state shall "deprive any person of life, liberty, or property, without due process of law".

Therefore, I am hereby lodging an official Ethics complaint against this attorney for violations to the and their inability to uphold their Oath. As a United States Citizen this attorney also happens to be a representative of the United States Government, therefore the consequences of these Representative Attorneys affects me in my home state, which violates the Constitution as a whole.

According to the American Bar Association Preamble regarding attorneys professional conduct, "... there are Rules that apply to lawyers who are not active in the practice of law or to practicing lawyers even when they are acting in a nonprofessional capacity. For example, a lawyer who commits fraud in the conduct of a business is subject to discipline for engaging in conduct involving dishonesty, fraud, deceit or misrepresentation."

The above noted attorney has on the above noted occasions, and of which does not represent the full breadth of their violations, has, in my opinion, violated the United States Constitution and has willingly, grievously and maliciously, acted against their Oath because according to the American Bar Association,

"As a public citizen, a lawyer should seek improvement of the law, access to the legal system, the administration of justice and the quality of service rendered by the legal profession. As a member of a learned profession, a lawyer should cultivate knowledge of the law beyond its use for clients, employ that knowledge in reform of the law and work to strengthen legal education. In addition, a lawyer should further the public's understanding of and confidence in the rule of law and the justice system because legal institutions in a constitutional democracy depend on popular participation and support to maintain their authority. A lawyer should be mindful of deficiencies in the administration of justice and of the fact that the poor, and sometimes persons who are not poor, cannot afford adequate legal assistance. Therefore, all lawyers should devote professional time and resources and use civic influence to ensure equal access to our system of justice for all those who because of economic or social barriers cannot afford or secure adequate legal counsel. A lawyer should aid the legal profession in pursuing these objectives and should help the bar regulate itself in the public interest."[1]

I am also calling in question the professional conduct of Attorney General Pamela Jo Bondi (Florida Bar #886440). Based on recent events and publicly available information, I believe there are numerous and substantial grounds to warrant an investigation into whether Attorney General Bondi engaged in misconduct that violates provisions of the Florida Rules of Professional Conduct.

I am deeply troubled by reports that General Bondi, who leads the most important legal body in the country, the Department of Justice, may have acted improperly and unethically. Given that

two of the core functions of the Florida Bar are to ensure “ensure the highest standards of legal professionalism in Florida . . . and protect the public by prosecuting unethical attorneys and preventing the unlicensed practice of law”, I strongly believe the Florida Bar should be aware of General Bondi’s potential misconduct in case this misconduct warrants an investigation and appropriate sanctions, including up to disbarment.[2]

The following details outline the basis for this inquiry:

Even as Attorney General of the United States, Pam Bondi remains subject to the Florida Rules of Professional Conduct in her capacity as an attorney licensed to practice law in the State of Florida. The matters described below represent serious breaches of professional ethics that warrant investigation and potentially disciplinary action.

According to public reports, Attorney General Bondi was involved in approving an arrangement that potentially appears to be a quid pro quo agreement that violates federal law and multiple ethical rules:[3]

- The U.S. Attorney's Office for the Southern District of New York had investigated and charged Mayor Eric Adams with public corruption offenses.
- Following the election, Mayor Adams reportedly began lobbying President-elect Trump to support him.
- After President Trump took office, Adams' attorneys proposed that in exchange for Adams supporting the President's plan to arrest and deport undocumented immigrants in New York City, the Department of Justice would drop the pending charges against him.
- Acting Deputy Attorney General Emil Bove, apparently with the approval of Attorney General Bondi, directed the U.S. Attorney's Office to dismiss the charges without prejudice—a maneuver that would allow the DOJ to reinstate charges if Mayor Adams failed to fulfill his part of the arrangement.
- Then-Acting U.S. Attorney for the Southern District of New York Danielle Sassoon refused to comply with this directive and sent a letter to Attorney General Bondi describing the improper quid pro quo arrangement. Sassoon requested that Bondi overrule Bove or accept Sassoon's resignation.
- With what appears to be Attorney General Bondi's authorization, Bove accepted Sassoon's resignation, threatened her and other prosecutors with retaliatory

investigations, and pressured prosecutors in Washington to file a motion to dismiss the charges against Mayor Adams.

- In court proceedings, Mr. Bove allegedly misrepresented to the judge that there was no quid pro quo arrangement, apparently with Attorney General Bondi's knowledge and approval.

This alleged conduct would violate several Florida Rules of Professional Conduct, including:[4]

- Rule 4-1.2(d) (assisting a client in conduct the lawyer knows is criminal or fraudulent)
- Rule 4-3.3 (candor toward the tribunal)
- Rule 4-8.4(c) (engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation)
- Rule 4-8.4(d) (engaging in conduct that is prejudicial to the administration of justice)

The quid pro quo arrangement that Attorney General Bondi allegedly authorized and approved with Mayor Adams would potentially constitute a criminal violation of 18 U.S.C. § 666, which prohibits providing a thing of value in return for an agreement to take official acts.

Attorney General Bondi has also apparently approved legally questionable positions and tactics in a case involving the deportation of Venezuelan nationals:[5]

- I. In *J.G.G. v. Trump*, the Department of Justice has taken the position that the Alien Enemies Act allows the government to deport individuals based solely on the President's determination, without any legal due process, that they are part of an "invasion" or "predatory incursion" by a "foreign nation or government."
- II. When Chief Judge James Boasberg of the U.S. District Court for the District of Columbia scheduled a hearing on a temporary restraining order to prevent these deportations, the government apparently expedited the deportation plans, placing some individuals on flights to El Salvador just as the hearing was beginning.
- III. Chief Judge Boasberg issued an order from the bench prohibiting the government from deporting any of the plaintiffs until he had ruled further on the case, and ordered the return of any individuals who were already on departing flights. Despite this order, several planes reportedly continued to El Salvador, where the men were imprisoned.
- IV. The Department of Justice, presumably with Attorney General Bondi's authorization, has taken the legally dubious position that the court lacks authority to review the President's

decision under the Alien Enemies Act and that the plaintiffs are not entitled to due process.

- V. The Department has also argued that it was not required to comply with the judge's oral order—another legally questionable position.
- VI. Most troublingly, the Department refused to comply with Judge Boasberg's demand for information about when the flights departed, which would allow the court to determine whether the government knowingly violated the court's order.
- VII. Evidence has reportedly emerged that at least some of the deported individuals had no connection to the Tren de Aragua gang that was the stated basis for their deportation. Attorney General Bondi is believed to be aware of this fact but has not directed any corrective action.

This alleged conduct would violate several Florida Rules of Professional Conduct, including:[6]

- Rule 4-3.1 (bringing or defending a proceeding or asserting or controverting an issue without a basis in law and fact)
- Rule 4-3.3(a)(1) (making a false statement of fact or law to a tribunal)
- Rule 4-3.4(c) (knowingly disobeying an obligation under the rules of a tribunal)
- Rule 4-8.4(c) (engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation)
- Rule 4-8.4(d) (engaging in conduct that is prejudicial to the administration of justice)

Attorney General Bondi has made several public statements that appear designed to undermine the judiciary and potentially endanger federal and state judges:[7]

- I. Bondi publicly accused Chief Judge Boasberg, the Chief Judge of the U.S. District Court for the District of Columbia, of "trying to protect terrorists who invaded our country over American citizens"—a statement she knew or should have known to be false. Chief Judge Boasberg has been properly fulfilling his judicial role by seeking to maintain the status quo while determining whether the government's actions have a lawful basis and whether the plaintiffs have received due process.
- II. There is no evidence to date that the plaintiffs are "terrorists," and Attorney General Bondi's characterization of Judge Boasberg's actions is a gross misrepresentation of his judicial conduct.

- III. Following the arrest of Milwaukee County Circuit Judge Hannah Dugan for allegedly obstructing an immigrant arrest, Attorney General Bondi described specific judges as “deranged” and attempted to characterize a wider swath of the federal judiciary as “think[ing] [that] they are beyond and above the law”. She also stated that “[w]e are going to prosecute you, and we are prosecuting you”, which seems intended to impose a chilling effect on the separation of powers and judicial independence.
- IV. These statements are particularly concerning given the current climate of heightened threats against judges, including Judge Boasberg. Attorney General Bondi must be aware that such inflammatory rhetoric could intensify these threats.

This conduct appears to violate several Florida Rules of Professional Conduct, including:[8]

- Rule 4-3.5 (seeking to influence a judge by means prohibited by law)
- Rule 4-3.6 (making extrajudicial statements likely to prejudice an adjudicative proceeding)
- Rule 4-8.4(c) (engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation)
- Rule 4-8.4(d) (engaging in conduct that is prejudicial to the administration of justice)

Additionally, on April 22, 2025 Attorney General Bondi hosted a meeting speaking on her endorsement of the “Eradicating Anti-Christian Bias Task Force”. [9]

- I. According to Bondi part of the meeting was televised, and part was held in a closed session. In the televised portions Bondi made unfounded claims about so-called Christian bias, attempting to use lawful arrests to prop up her UnConstitutional statements about protestors arrested for breaking federal law under the FACE Act, which she referenced.
- II. Promoting the task force, indicates her willful misunderstanding of the Constitution when she claimed that institutions and media misrepresent our “founding principles”.
- III. Bondi indicated that the Department of Justice would favor Christians, by stating the task force “will protect religious liberty for Christians”, however, the Establishment Clause of the First Amendment to the United States Constitution prohibits the government from establishing or promoting a religion. It ensures that the government does not favor or endorse any particular religion, or all religions collectively, as part of its function. This clause also prohibits the government from taking actions that unduly burden or discriminate against religious individuals or groups. The Establishment Clause prohibits

government actions that give preferential treatment to one religion over others, or to religion over non-religion. [10].

- IV. Bondi's support of the illegal Executive Order as an attorney violates many of the same Florida Rules of Professional Conduct addressed above, in addition to multiple Constitutional rights violations.

This conduct appears to violate several Florida Rules of Professional Conduct, including:[11]

- Rule 4-3.1 (bringing or defending a proceeding or asserting or controverting an issue without a basis in law and fact)
- Rule 4-3.6 (making extrajudicial statements likely to prejudice an adjudicative proceeding)
- Rule 4-8.4(c) (engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation)
- Rule 4-8.4(d) (engaging in conduct that is prejudicial to the administration of justice)

The cumulative conduct described above represents potentially serious violations of Attorney General Bondi's ethical obligations as an attorney. As the highest-ranking law enforcement officer in the United States, Attorney General Bondi's adherence to the Rules of Professional Conduct is of paramount importance to maintaining the integrity of our justice system and public confidence in the rule of law. I believe it is incumbent on the Florida Bar to do its part to uphold the rule of law and integrity among the attorneys it oversees, no matter how powerful or well-connected those attorneys may be.

We the People respectfully request that the Attorney Consumer Assistance Program's Office of Disciplinary Counsel keep us informed of any actions taken, including if the Office (1) initiates and conducts an official investigation into these matters and (2) chooses to impose any and all appropriate disciplinary actions as warranted by the evidence.

Citations:

- [1] The American Bar Association, https://www.americanbar.org/groups/professional_responsibility/publications/model_rules_of_professional_conduct/model_rules_of_professional_conduct_preamble_scope/
- [2] The Florida Bar, <https://www.floridabar.org/about/>
- [3] Michael Rothfeld, Danielle Sassoon's Letter to Attorney General Pam Bondi, Annotated, New York Times (Feb. 13, 2025),

<https://www.nytimes.com/interactive/2025/02/13/us/doc-annotation-letter-to-bondi.html>; U.S. Representatives Connolly, Lee, Raskin, & McBath, Letter to Attorney General Bondi, U.S. House of Representatives (Mar. 2, 2025), https://democrats-judiciary.house.gov/uploadedfiles/2025-02-21_gec_lee_raskin_mcbath_to_ag_bondi_re_corruption.pdf; U.S. Representatives Raskin & Crockett, Letter to Attorney General Bondi, U.S. House of Representatives (Mar. 2, 2025), https://democrats-judiciary.house.gov/uploadedfiles/2025-03-02_raskin_crockett_to_bondi_doj_re_adams.pdf

[4] The Florida Bar, https://www-media.floridabar.org/uploads/2025/02/2025_06-DEC-RRTFB-12-30-2024-1.pdf

[5] Vivian Sequera, Venezuela minister says no Tren de Aragua members among US deportees, Yahoo!News, (Mar. 21, 2025), <https://www.yahoo.com/news/venezuela-minister-says-jailed-deportees-164347739.html>;

Amended Complaint, U.S. District Court for the District of Columbia, (Apr. 24, 2025), <https://storage.courtlistener.com/recap/gov.uscourts.dcd.278436/gov.uscourts.dcd.278436.101.0.pdf>

[6] The Florida Bar, https://www-media.floridabar.org/uploads/2025/02/2025_06-DEC-RRTFB-12-30-2024-1.pdf

[7] Tierney Sneed, 'Breathtaking in its audacity': Trump's conflict with judges has escalated to new heights, CNN (Apr. 17, 2025), <https://www.cnn.com/2025/04/17/politics/trump-judges-conflict-boasberg-contempt/index.html>;

Jason Lalljee, "Deranged" Milwaukee judge's arrest a warning to others, Bondi says, [Axios.com](https://www.axios.com/2025/04/25/hannah-dugan-trump-bondi-fbi-arrest) (Apr. 25, 2025), <https://www.axios.com/2025/04/25/hannah-dugan-trump-bondi-fbi-arrest>

[8] The Florida Bar, https://www-media.floridabar.org/uploads/2025/02/2025_06-DEC-RRTFB-12-30-2024-1.pdf

[9] Attorney General Pamela Bondi hosted Trump administration officials at the Department of Justice on Tuesday for a meeting on the Eradicating Anti-Christian Bias Task Force, the newest force ordered by the president., [NBC 10 WJAR](https://www.youtube.com/watch?v=_jYiJjNezq0) (Apr. 22, 2025), https://www.youtube.com/watch?v=_jYiJjNezq0

[10] United States Courts, First Amendment and Religion, <https://www.uscourts.gov/about-federal-courts/educational-resources/about-educational-outreach/activity-resources/first-amendment-and-religion#:~:text=The%20Establishment%20clause%20prohibits%20the%20government%20from,churches%2C%20such%20as%20the%20Church%20of%20England.>

[11] The Florida Bar, https://www-media.floridabar.org/uploads/2025/02/2025_06-DEC-RRTFB-12-30-2024-1.pdf

Thank you for your attention to this matter.

Constituent of the United States of America

X

Name: _____

Date: _____

Notary Acknowledgement

State of _____)
) SS.

County of _____)

The Affiant, [_____] ,
being duly sworn, on oath deposes and says that above named Constituent is the Claimant and
that Constituent has read the foregoing claim and knows the contents thereof, and that all
statements therein contained are true and correct to the best of the Constituent's belief and
knowledge.

Subscribed and sworn to before me on: _____

Notary Signature

Notary Printed Name

Notary Commission Expires on: