

# Congress of the United States

Washington, DC 20515

May 1, 2025

**ATTORNEY CONSUMER ASSISTANCE PROGRAM OFFICE OF  
DISCIPLINARY COUNSEL  
THE FLORIDA BAR  
651 East Jefferson St.  
Tallahassee, FL 32399-2300**

**RE: Inquiry regarding Potential Misconduct by Attorney General Pamela Jo Bondi**

To the Office of Disciplinary Counsel:

We are writing to express our concerns regarding the professional conduct of Attorney General Pamela Jo Bondi (Florida Bar #886440). Based on recent events and publicly available information, we 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.

As lawmakers and attorneys, we know how important the rule of law and ethical conduct are in carrying out the law, particularly for someone who leads the most important legal body in the country, the Department of Justice. We are deeply troubled by reports that General Bondi 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”, we 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.<sup>1</sup>

The following details outline the basis for this inquiry:

---

<sup>1</sup> The Florida Bar, <https://www.floridabar.org/about/>

## I. Introduction

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.

## II. Approval of Unethical and Illegal Bribery Arrangement Involving New York Mayor Eric Adams

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:<sup>2</sup>

1. The U.S. Attorney's Office for the Southern District of New York had investigated and charged Mayor Eric Adams with public corruption offenses.
2. Following the election, Mayor Adams reportedly began lobbying President-elect Trump to support him.
3. 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.
4. 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.
5. 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.
6. 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.
7. 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.

---

<sup>2</sup> 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](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](https://democrats-judiciary.house.gov/uploadedfiles/2025-03-02_raskin_crockett_to_bondi_doj_re_adams.pdf)

This alleged conduct would violate several Florida Rules of Professional Conduct, including:<sup>3</sup>

- 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.

### III. Oversight of Unlawful Conduct in *J.G.G. v. Trump*

Attorney General Bondi has also apparently approved legally questionable positions and tactics in a case involving the deportation of Venezuelan nationals:<sup>4</sup>

1. 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."
2. 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.
3. 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.
4. 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.
5. The Department has also argued that it was not required to comply with the judge's oral order—another legally questionable position.
6. 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.

---

<sup>3</sup> The Florida Bar, [https://www-media.floridabar.org/uploads/2025/02/2025\\_06-DEC-RRTFB-12-30-2024-1.pdf](https://www-media.floridabar.org/uploads/2025/02/2025_06-DEC-RRTFB-12-30-2024-1.pdf)

<sup>4</sup> 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>

7. 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:<sup>5</sup>

- 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)

#### **IV. Improper Public Comments Regarding the Federal and State Judiciary and Federal and State Judges**

Attorney General Bondi has made several public statements that appear designed to undermine the judiciary and potentially endanger federal and state judges:<sup>6</sup>

1. 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.
2. 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.
3. 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 swatch 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.

---

<sup>5</sup> The Florida Bar, [https://www-media.floridabar.org/uploads/2025/02/2025\\_06-DEC-RRTFB-12-30-2024-1.pdf](https://www-media.floridabar.org/uploads/2025/02/2025_06-DEC-RRTFB-12-30-2024-1.pdf)

<sup>6</sup> 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 (Apr. 25, 2025), <https://www.axios.com/2025/04/25/hannah-dugan-trump-bondi-fbi-arrest>

4. 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:<sup>7</sup>

- 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)

## V. Conclusion

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. We 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 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.

Sincerely,



Dave Min  
Member of Congress



Mike Levin  
Member of Congress

---

<sup>7</sup> The Florida Bar, [https://www-media.floridabar.org/uploads/2025/02/2025\\_06-DEC-RRTFB-12-30-2024-1.pdf](https://www-media.floridabar.org/uploads/2025/02/2025_06-DEC-RRTFB-12-30-2024-1.pdf)

## **Addendum**

- 1) 02.12.25 - Sassoon Letter to AG Bondi
- 2) 02.23.25 - Reps. Connolly, Lee, Raskin, & McBath Letter to AG Bondi
- 3) 03.02.25 - Reps. Raskin & Crockett Letter to AG Bondi
- 4) 03.21.25 - Venezuela Minister Comments
- 5) 04.17.25 - CNN Article re AG Bondi Comments
- 6) 04.24.25 - Amended Complaint to U.S. District Court for the District of Columbia
- 7) 04.25.25 - Axios Article re AG Bondi Comments