

Congress of the United States

Washington, DC 20515

July 16, 2025

**OFFICE OF DISCIPLINARY COUNSEL
DISTRICT OF COLUMBIA COURT OF APPEALS
515 5th Street NW
Building A, Suite 117
Washington, DC 20001**

RE: Inquiry regarding Potential Misconduct by United States Pardon Attorney Edward Robert Martin Jr.

To the Office of Disciplinary Counsel:

We are writing to express our concerns regarding the professional conduct of United States (U.S.) Pardon Attorney Edward Robert Martin Jr. (**bar # 63105 or 481866**). Based on recent events and publicly available information, we believe there are numerous and substantial grounds to warrant an investigation into whether U.S. Pardon Attorney Martin engaged in misconduct that violates provisions of the District of Columbia (D.C.) Rules of Professional Conduct.

As lawmakers and attorneys, we understand the importance of ethical conduct, particularly for someone holding consequential positions like the Interim U.S. Attorney for the District of Columbia and the U.S. Pardon Attorney. As such, we are deeply troubled by reports of unethical and improper actions taken by U.S. Pardon Attorney Martin. Given that the District of Columbia Court of Appeals created the Office of Disciplinary Counsel (ODC) to “protect the public by disciplining lawyers who violate the ethics rules”, we strongly believe the D.C. Bar should be made aware of U.S. Pardon Attorney Martin’s potential misconduct in case this misconduct warrants an investigation and appropriate sanctions, including up to disbarment.¹ While the Senate Judiciary Committee has previously raised similar concerns, we wanted to share additional actions he has taken since the Committee’s letter on March 6, 2025, as well as other instances of misconduct that it may have not touched upon.²

¹ D.C. Bar, <https://www.dcbbar.org/attorney-discipline>.

² U.S. Senate Comm. on the Judiciary, *Durbin, Senate Judiciary Democrats File Misconduct Complaint Against Interim U.S. Attorney Ed Martin With D.C. Bar* (Mar. 6, 2025), <https://www.judiciary.senate.gov/press/dem/releases/durbin-senate-judiciary-democrats-file-misconduct-complaint-against-interim-us-attorney-ed-martin-with-dc-bar>

The following details outline the basis for this inquiry:

I. Introduction

As an active member of the D.C. Bar in good standing, Martin remains subject to the D.C. Rules of Professional Conduct in his capacity as an attorney licensed to practice law in the District of Columbia. The matters described below represent serious breaches of professional ethics that warrant investigation and potentially disciplinary action.

II. Improper Public Comments Regarding Missouri State Judiciary and State Judges

U.S. Pardon Attorney Martin “ghostwrote” several public statements in 2016 while a barred and active attorney in the State of Missouri that appear designed to undermine the judiciary:³

1. During litigation in 2016, for which Martin was the lead defendant, he purchased a laptop for Priscilla Gray, an individual connected to the lawsuit, but not a party to the case.⁴
2. According to public reporting, Martin ghostwrote many of the inflammatory comments that Priscilla Gray left as comments on Illinois State Court Judge John Barberis’s personal Facebook account.⁵
3. For example, Martin asked Priscilla Gray to state that Judge Barberis’ actions were “unfair and rigged over and over” and that Judge Barberis should be ashamed of himself.⁶ He also drafted a statement that Judge Barberis’ ruling was “judicial activism at its worst” and that this was emblematic of “when the law is undermined by judges who think they can do whatever they want”.⁷

Again, this is particularly concerning because Martin was a licensed attorney at the time and understood the severity of his actions. In 2019, Martin even acknowledged in a sworn deposition that lawyers are prohibited from both communicating with judges outside of court and engaging in conduct that is intended to disrupt judicial proceedings.

In addition to likely violating several Missouri Rules of Professional Conduct, this conduct appears to violate several D.C. Rules of Professional Conduct, including:

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

³ Jeremy Kohler & Andy Kroll, *The Untold Story of How Ed Martin Ghostwrote Online Attacks Against a Judge — and Still Became a Top Trump Prosecutor*, PROPUBLICA (Apr. 24, 2025), <https://www.propublica.org/article/ed-martin-trump-interim-dc-us-attorney-secret-judge-attacks>.

⁴ *Ibid.*

⁵ *Ibid.*

⁶ *Ibid.*

⁷ *Ibid.*

III. Improper Threats to Initiate Political Investigations into Government Officials and Non-Governmental Entities

U.S. Pardon Attorney Martin has made several public statements that appear designed to abuse his government position and chill political discourse by initiating politically motivated investigations. These statements have been made both in his current capacity, as well as in his previous capacity as Interim U.S. Attorney for the District of Columbia. Not only would these statements likely violate the Department of Justice’s internal guidance, but they also likely violate Rule 8.4(d) and Rule 3.8’s special responsibilities of prosecutor.⁸

1. Martin sent several tweets and letters to Elon Musk, when Musk was serving as a Special Government Employee, that he would prosecute anyone who impeded Musk’s work.⁹
2. He also threatened several Members of Congress regarding statements that they made criticizing Elon Musk and Supreme Court Justices via the D.C. U.S. Attorney Office Initiative “Operation Whirlwind”, which was stood up to investigate threats against government officials.¹⁰ Additionally, Martin asked Congressman Eugene Vindman for “clarification” about his personal financial situation.¹¹
3. Additionally, Martin targeted Georgetown University Law Center, stating that he had initiated an inquiry into Georgetown’s diversity, equity, and inclusion practices.¹²
4. Martin has also threatened former Special Counsel Jack Smith, and the attorneys who worked with him, directing them to “[s]ave your receipts.”¹³
5. In response to President Trump’s pardon of Sheriff Scott Jenkins, Martin posted, “No MAGA left behind.” This is concerning given the implication that Martin would use his power as U.S. Pardon Attorney to pardon those who support President Trump’s “Make America Great Again” platform.¹⁴

⁸ U.S. Dep’t of Justice, Justice Manual § 1-7.400; D.C. Rules of Professional Conduct, Rule 8.4(d); D.C. Rules of Professional Conduct, Rule 3.8(a).

⁹ @EagleEdMartin (Feb. 3, 2025, 11:46 AM), <https://x.com/EagleEdMartin/status/1886456136032817488>; @EagleEdMartin (Feb. 7, 2025, 11:27 AM), <https://x.com/EagleEdMartin/status/1887901087983689761> (emphasis in original).

¹⁰ Sebastien Kraft, *Rep. Vindman condemns letter from U.S. attorney requesting business details*, INSIDENOVA.COM (Mar. 13, 2025), https://www.insidenova.com/headlines/rep-vindman-condemns-letter-from-u-s-attorney-requesting-business-details/article_52fc2730-ff68-11ef-b0ef-2fb4e6b78d9c.html; *Read interim U.S. attorney Ed Martin’s letters to Democratic lawmakers*, WASH. POST, (Feb. 19, 2025), <https://www.washingtonpost.com/dc-md-va/2025/02/19/ed-martin-dc-letters-schumer-garcia/>.

¹¹ Sebastien Kraft, *Rep. Vindman condemns letter from U.S. attorney requesting business details*, INSIDENOVA.COM (Mar. 13, 2025), https://www.insidenova.com/headlines/rep-vindman-condemns-letter-from-u-s-attorney-requesting-business-details/article_52fc2730-ff68-11ef-b0ef-2fb4e6b78d9c.html

¹² Nina Lakhani, *US attorney tells Georgetown law he won’t hire from any school with DEI*, THE GUARDIAN (Mar. 6, 2025), <https://www.theguardian.com/us-news/2025/mar/06/ed-martin-us-attorney-dei>; NAT’L CATHOLIC REP., <https://www.ncronline.org/files/2025-03/3.7.24%20Ed%20Martin%20letter%20to%20Georgetown%20law.pdf>.

¹³ Jeremy Kohler & Andy Kroll, *The Untold Story of How Ed Martin Ghostwrote Online Attacks Against a Judge — and Still Became a Top Trump Prosecutor*, PROPUBLICA (Apr. 24, 2025), <https://www.propublica.org/article/ed-martin-trump-interim-dc-us-attorney-secret-judge-attacks>.

¹⁴ @TomDreisbach, X.com (May 27, 2025, 8:32am), <https://x.com/TomDreisbach/status/1927342053156917264>.

6. Martin also sent several threatening letters to medical journals across the country, inquiring about alleged partisan leanings, bias, and misinformation.¹⁵
7. Breaking from established norms, Martin injected himself into an investigation targeting the Environmental Protection Agency, and personally submitted a seizure warrant application without any other prosecutors.¹⁶
8. Prior to stepping down as Interim U.S. Attorney, Martin stated that “[i]f they can be charged, we’ll charge them” and “[b]ut if they can’t be charged, we will name them. And we will name them, and in a culture that respects shame, they should be people that are ashamed.”¹⁷ This sentiment is deeply concerning, threatens to further chill political discourse in this country, and is entirely unprofessional.

This conduct appears to violate several D.C. Rules of Professional Conduct, including:

- Rule 3.6 (making extrajudicial statements likely to prejudice an adjudicative proceeding)
- Rule 3.8(a) (improperly favoring or invidiously discriminating against any person as a prosecutor)
- Rule 8.4(c) (engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation)
- Rule 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 U.S. Pardon Attorney Martin’s ethical obligations as an attorney. As the U.S. Pardon Attorney, Martin assists the president and offers guidance on how to grant pardons for federal offenses, as outlined in Article II, Section 2, of the Constitution.¹⁸ As such, adherence to the D.C. Rules of Professional Conduct is of paramount importance to maintaining the integrity of our justice system and safeguarding public trust. We believe it is incumbent on the D.C. 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 District of Columbia Court of Appeals’ Office of Disciplinary Counsel keep us informed of any actions taken per Rule XI of the Rules Governing the District of Columbia Bar, including if the Office (1) initiates and conducts an official investigation into

¹⁵ Rob Stein, Medical journals hit with threatening letters from Justice Department NPR (May 2, 2025), <https://www.npr.org/sections/shots-health-news/2025/05/02/nx-s1-5374993/medical-journals-hit-with-threatening-letters-from-justice-department>.


¹⁶ Spenser S. Hsu, Maxine Joselow, & Nicolas Rivero, *FBI takes up EPA probe amid pushback from judge, prosecutors*, WASH. POST (Feb. 27, 2025), <https://www.washingtonpost.com/dc-md-va/2025/02/27/trump-fbi-epa-grant-investigation>.

¹⁷ Glenn Thrust & Alan Feuer, *If Justice Dept. Can’t Prosecute Trump’s Foes, It Will ‘Shame’ Them, Official Says*, N.Y. TIMES (May 21, 2025), <https://www.nytimes.com/2025/05/21/us/politics/trump-justice-department-ed-martin-weaponization.html>.

¹⁸ U.S. Const. art. II, § 2.

these matters and (2) chooses to impose any and all appropriate disciplinary actions as warranted by the evidence.¹⁹

Sincerely,


Dave Min
Member of Congress
Sean Casten
Member of Congress

¹⁹ D.C. Bar, <https://www.dcbbar.org/about/who-we-are/rules-and-bylaws/rules-governing-the-district-of-columbia-bar/rule-xi-disciplinary-proceedings>.

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July 16, 2025

**First Judicial Department Disciplinary Counsel
ATTORNEY GRIEVANCE COMMITTEE
SUPREME COURT, APPELLATE DIVISION
Department Disciplinary Committee for the First Judicial Department
180 Maiden Lane, 17th Floor
New York, NY 10038**

**RE: Inquiry regarding Potential Misconduct by United States Principal
Associate Deputy Attorney General Emil Joseph Bove III**

Dear Sir or Madam:

We are writing to express our concerns regarding the professional conduct of Emil Joseph Bove, III (New York Bar License number 4700696). Based on recent events and publicly available information, we believe there are numerous and substantial grounds to warrant an investigation into whether Bove, acting in his roles as United States Principal Deputy Attorney General and Acting Deputy Attorney General, engaged in misconduct that violates provisions of the New York State Bar Association (NYSBA) New York Rules of Professional Conduct.¹ This conduct is especially concerning given his recent confirmation hearing before the U.S. Senate on June 25, 2025, in consideration of a lifetime appointment as a judge for the U.S. Court of Appeals for the Third Circuit.

As lawmakers and attorneys, we understand the importance of ethical conduct, particularly for someone holding consequential positions in the government. As such, we are deeply troubled by reports of unethical and improper actions taken by Bove, while he was serving in these key roles in the U.S. Department of Justice (DOJ). According to the NYSBA Committee on Professional Discipline, “all attorneys are obligated to maintain the highest ethical standards” and “[a]ttorneys who violate the law or fail to abide by this code of conduct are subject to discipline, which may include admonishment, reprimand, censure, suspension or loss of his or her license to practice law.”²

As such, we strongly believe the NYSBA and the Appellate Division of the New York State Supreme Court should be made aware of Bove’s potential misconduct in case this misconduct

¹ NYSBA Rules of Professional Conduct, <https://nycourts.gov/ad3/agc/rules/22NYCRR-Part-1200.pdf>

² NYSBA Guide to Attorney Discipline, <https://nysba.org/public-resources/guide-to-attorney-discipline/?srsltid=AfmBOoqueCQ7cDUjSzMm4t7F3qXfzRS1YF8n0sUJLW68ZzmtnvATZFzi>

warrants an investigation and appropriate sanctions, including up to disbarment. While the Senate Judiciary Committee has previously raised similar concerns, we wanted to re-emphasize them and share additional actions Bove has taken since the Committee's letter on March 4, 2025.³

The following details outline the basis for this inquiry:

I. Introduction

As an active member of the NYSBA in good standing, Bove remains subject to the NYSBA New York Rules of Professional Conduct in his capacity as an attorney licensed to practice law in New York, even though he is currently based in Washington, D.C. 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, Bove, while serving as the Principal Associate Deputy Attorney General and Acting Deputy Attorney General in the U.S. DOJ, was involved in an arrangement that potentially appears to be a quid pro quo agreement that violates federal law and multiple ethical rules:⁴

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 DOJ would drop the pending charges against him.
4. As Acting Deputy Attorney General, Emil Bove, apparently with the approval of Attorney General Bondi, directed the U.S. Attorney's Office on February 10, 2025, to

³ U.S. Senate Comm. on the Judiciary, *Durbin, Senate Judiciary Democrats File Misconduct Complaint Against Acting Deputy Attorney General Emil Bove With New York State Bar* (Mar. 4, 2025), <https://www.judiciary.senate.gov/press/dem/releases/durbin-senate-judiciary-democrats-file-misconduct-complaint-against-acting-deputy-attorney-general-emil-bove-with-new-york-state-bar>

⁴ 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

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 on February 12, 2025, 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 on February 13, 2025, 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. Bove’s intent to secure a quid pro quo appears to be clear, given that Tom Homan, President Trump’s “border czar”, seemed to threaten Mayor Adams in a February 14, 2025, meeting regarding immigration enforcement.⁵

This alleged conduct would violate several NYSBA Rules of Professional Conduct, including:

- Rule 1.2(d) (assisting a client in conduct the lawyer knows is criminal or fraudulent)
- Rule 8.4(a) (Inducing other attorneys to violate or attempt to violate the Rules of Professional Conduct)
- Rule 8.4(c) (engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation)
- Rule 8.4(d) (engaging in conduct that is prejudicial to the administration of justice)
- Rule 8.4(e) (implying an ability to influence improperly or upon irrelevant grounds any tribunal, legislative body, or public official)
- Rule 8.4(h) (engaging in any other conduct that adversely reflects on the lawyer’s fitness as a lawyer)

The quid pro quo arrangement that Bove allegedly facilitated with Mayor Adams would potentially also 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. Defying Lawful Court Orders per Whistleblower Complaint

According to a DOJ whistleblower complaint filed by former Acting Deputy Director for the Office of Immigration Litigation (OIL) Erez Reuveni, Bove, while serving as the Principal Associate Deputy Attorney General and Acting Deputy Attorney General for the DOJ, suggested that the DOJ should defy court orders halting expedited deportations under the Alien Enemies Act.⁶ Specifically, Mr. Reuveni alleged that Bove suggested the DOJ tell courts “fuck you” in

⁵ Mr. Homan stated during the Fox News appearance that: ““If he doesn’t come through, I’ll be back in New York City, and we won’t be sitting on the couch—I’ll be in his office, up his butt, saying, ‘Where the hell is the agreement we came to?’” Emma G. Fitzsimmons, *Eric Adams Highlights Coordination with Trump’s Border Czar on Fox News*, N.Y. TIMES (Feb. 14, 2025), <https://www.nytimes.com/2025/02/14/nyregion/adams-homan-fox-interview.html>.

⁶ *American Oversight Urges Senate to Reject Emil Bove’s Judicial Nomination, Renews Call for Misconduct Probe Amid Damning New Whistleblower Allegations*, AMERICAN OVERSIGHT (Jun. 25, 2025) <https://americanoversight.org/american-oversight-urges-senate-to-reject-emil-boves-judicial-nomination-renews-call-for-misconduct-probe-amid-damning-new-whistleblower-allegations/>.

response to adverse court orders.⁷ Additionally, among other things, Mr. Reuveni asserted that various DOJ and White House Officials coordinated to misrepresent, or outright ignore, facts in court, conceal information regarding deportations, and mislead judges.⁸

Bove allegedly made these statements and took these actions while serving as the Principal Deputy Attorney General and Acting Deputy Attorney General for the DOJ. Not only would these statements and actions likely violate Rule 8.4(c), but also Rule 3.3 regarding conduct before a tribunal:

1. Following his appointment as Acting Deputy Director of OIL on March 14, 2025, Mr. Reuveni alleged that he became aware of plans to resist court orders halting or impeding efforts to deport non-citizens from the United States under the Enemy Alien Act.
2. During a March 14, 2025, meeting with other DOJ leadership, Bove stated that the planes carrying non-citizens for removal from the U.S. “needed to take off no matter what”.⁹ To emphasize this, Bove allegedly stated that the DOJ would “need to consider telling the courts ‘fuck you’ and ignore any such court order.”¹⁰
3. Five Venezuelan nationals facing deportation requested relief from the U.S. District Court for the District of Columbia.¹¹ Chief Judge James Boasberg was assigned to the case and scheduled a hearing on a temporary restraining order to prevent the deportation of the Venezuelan nationals. In response, the government apparently expedited the deportation plans, placing some individuals on flights to El Salvador just as the hearing was beginning.
4. Chief Judge Boasberg issued an oral 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 on departed flights. Despite this order, several planes reportedly continued to El Salvador.
5. On March 15, 2025, Mr. Reuveni was informed that the DOJ planned to file a court notice, signed by Bove. The notice would assert that the DOJ had not misinterpreted Chief Judge Boasberg’s injunction against deportations, arguing that several deportation flights had already left U.S. airspace before Judge Boasberg’s written order was issued—despite an earlier oral directive.¹²

⁷ Devlin Barrett, Justice Dept. Leader Suggested Violating Court Orders, Whistle-Blower Says, N.Y. TIMES (Jun. 24, 2025) <https://www.nytimes.com/2025/06/24/us/politics/justice-department-emil-bove-trump-deportations-reuveni.html>.

⁸ *American Oversight Urges Senate to Reject Emil Bove’s Judicial Nomination, Renews Call for Misconduct Probe Amid Damning New Whistleblower Allegations*, AMERICAN OVERSIGHT (Jun. 25, 2025) <https://americanoversight.org/american-oversight-urges-senate-to-reject-emil-boves-judicial-nomination-renews-call-for-misconduct-probe-amid-damning-new-whistleblower-allegations/>.

⁹ Whistleblower Complaint, <https://static01.nyt.com/newsgraphics/documenttools/e285ec96adf8d443/5868d536-full.pdf>.

¹⁰ *Ibid.*

¹¹ Ryan Goodman, *Timeline of US Flight to El Salvador and Judge’s Order to Turn Around Planes*, JUST SECURITY (Mar. 16, 2025) <https://www.justsecurity.org/109173/timeline-flight-el-salvador-judge-order/>.

¹² Whistleblower Complaint, <https://static01.nyt.com/newsgraphics/documenttools/e285ec96adf8d443/5868d536-full.pdf>.

6. Mr. Reuveni later learned on March 16, 2025, that Bove had informed the DOJ of Homeland Security that it could deplane individuals on the deportation flights that had left U.S. airspace before Chief Judge Boasberg's written order had been docketed.¹³
7. On April 1, 2025, Mr. Reuveni received a phone call from Acting Assistant Attorney General Roth, who conveyed to Mr. Reuveni that Bove was "very unhappy" that Mr. Reuveni had been contacting various agencies to ascertain whether the DOJ had violated a lawful court order.¹⁴
8. On April 4, 2025, Mr. Reuveni asserted that he declined instructions from DOJ leadership to submit a misleading court brief, having already informed the court that Mr. Abrego Garcia's removal from the U.S. had been in error, in the case *Abrego Garcia v. Noem*.¹⁵
9. Following this, Mr. Reuveni was placed on administrative leave on April 5, 2025, and then terminated from the DOJ on April 11, 2025.

This conduct appears to violate several NYSBA Rules of Professional Conduct, including:

- Rule 1.2(d) (scope of representation)
- Rule 3.3(a) (conduct before a tribunal)
- Rule 8.4(c) (engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation)
- Rule 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 Bove's ethical obligations as an attorney. As the Principal Associate Deputy Attorney General for the DOJ, Bove is the principal advisor to the Deputy Attorney General, Todd Blanche, and offers guidance on many matters that fall under the DOJ's jurisdiction. As such, adherence to the NYSBA New York Rules of Professional Conduct is of paramount importance to maintaining the integrity of our justice system and safeguarding public trust. We believe it is incumbent on the NYSBA 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 New York State Supreme Court, Appellate Division's Attorney Grievance Committee keep us informed of any actions taken per 22 N.Y.C.R.R. Part 1240 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.¹⁶

¹³ *Ibid.*

¹⁴ *Ibid.*

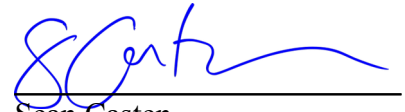
¹⁵ *Abrego Garcia v. Noem*, 23-cv-951 (D.Md.).

¹⁶ 22 N.Y. Comp. Codes R. & Regs. tit. 22, § 1240 (2016), <https://ww2.nycourts.gov/sites/default/files/document/files/2018-06/22%20NYCRR%20Part%201240.pdf>

Sincerely,



Dave Min
Member of Congress



Sean Casten
Member of Congress