

IN THE SUPREME COURT OF FLORIDA

THE FLORIDA BAR,

Petitioner,

v.

ASHLEY ANN KRAPACS,

Respondent.

Supreme Court Case
No. SC-

The Florida Bar File Nos.
2018-50,829(17I)FES
2018-50,851(17I)
2019-50,081(17I)

THE FLORIDA BAR'S PETITION FOR EMERGENCY SUSPENSION

This petition of The Florida Bar seeks emergency relief and requires the immediate attention of the Court pursuant to R. Regulating Fla. Bar 3-5.2. The Florida Bar seeks the emergency suspension of **Ashley Ann Krapacs**, Attorney No. 122407, from the practice of law in Florida based on facts that establish clearly and convincingly that **Ashley Ann Krapacs** appears to be causing great public harm as will be shown by facts supported by the affidavits of attorneys Russell J. Williams and Nisha Bacchus, as well as multiple other exhibits, as follows:

1. The filing of this Petition for Emergency Suspension has been authorized by the Executive Director of The Florida Bar.
2. Respondent, **Ashley Ann Krapacs**, is and at all times hereinafter mentioned, was a member of The Florida Bar admitted on April 25, 2016, and subject to the jurisdiction and disciplinary rules of the Supreme Court of Florida.

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3. Respondent is currently the subject of Bar disciplinary matters which have been assigned The Florida Bar file numbers 2018-50,829(17I)FES; 2018-50,851(17I); and 2019-50,081(17I).

4. The affidavits of attorneys Russell J. Williams and Nisha Bacchus, attached hereto as **The Florida Bar's Exhibits A and B**, are used by the Bar to support this Petition for Emergency Suspension.

5. Respondent has targeted these two members of The Florida Bar with a variety of vicious social media online continuous attacks and other conduct as a result of their representation of clients in litigation against this Respondent.

6. This petition has been filed as a result of the escalation of Respondent's misconduct, which resulted in attorney Bacchus filing and obtaining a Temporary Injunction for Protection Against Stalking, as well as a police report, and attorney Williams filing a lawsuit for Libel, Slander, Malicious Prosecution and Injunctive Relief.¹ (The Petition for Injunction for Protection Against Stalking, the temporary injunction, the Order, and the Supplemental Affidavit in Support of Petition for Injunction for Protection Against Stalking are attached hereto as **The Florida Bar's Composite Exhibit C**. The police report is attached hereto as **The**

¹ The Bar is not concerned with the outcome of these proceedings, but rather that the Respondent's conduct has caused two members of The Florida Bar to seek extraordinary relief. The Bar would note, however, that on February 1, 2019, Ms. Bacchus' Request for a Permanent Injunction was granted by the Honorable Stephanie Moon, Broward Circuit Court Judge.

Florida Bar's Exhibit D. The lawsuit is attached hereto as **The Florida Bar's Exhibit E.)**

7. The Florida Bar maintains that Respondent's actions, as set forth below, strike at the heart of conduct prejudicial to the administration of justice since the Respondent's attacks are solely because attorneys Williams and Bacchus represent or represented individuals adverse to the Respondent. Rather than properly utilizing the court system, Respondent has launched an attack of massive and continuous proportions under Respondent's misguided belief that the First Amendment shields her from scrutiny and prosecution by The Florida Bar for egregious misconduct.

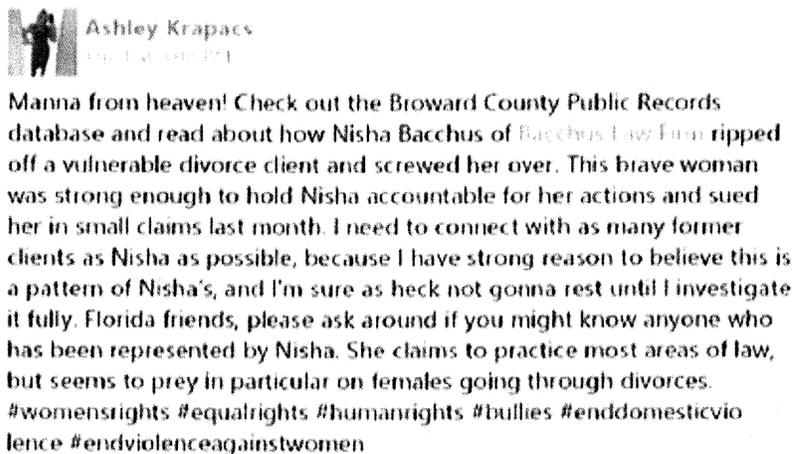
The First Amendment does not protect those who make harassing or threatening remarks about the judiciary or opposing counsel. *See Florida Bar v. Wasserman*, 675 So.2d 103, 104-05 (Fla. 1996). Under Rule of Professional Conduct 4-8.4(d), lawyers are required to refrain from knowingly disparaging or humiliating other lawyers. *See Florida Bar v. Uhrig*, 666 So.2d 887, 888 (Fla.1996).

The Florida Bar v. Sayler, 721 So.2d 1152 (Fla. 1998)

8. Additionally, rather than utilize the court system in a proper manner to advocate a position, Respondent has elected to engage in unilateral uncivilized public attacks. It is always feared that "engaging" with someone who spews venom will exacerbate the attacks. As such, the subjects of the attacks are, in

reality, unable to defend themselves. On the other hand, both Mr. Williams and Ms. Bacchus have elected to properly utilize the court system with litigation and a restraining order against the Respondent.

9. Respondent recently and astonishingly admitted and publicly broadcast her intention to “connect” with Ms. Bacchus’ former clients and has sent out a public cry for others to assist her with the below post dated January 4, 2019. All actions of Respondent are in furtherance of her goal to destroy Ms. Bacchus.



Respondent confirmed her intentions in an e-mail to The Florida Bar on January 21, 2019 in which she stated, in pertinent part:

I will be filing a formal bar complaint against Nisha based on the inaccuracies in the injunction petition and the fact that it's clear she filed the case merely to gain leverage in the civil defamation case. Further, I'll be representing several of her former clients in various bar complaints and potential malpractice cases.

(The January 21, 2019 e-mail is attached hereto as **The Florida Bar's Exhibit F.**)

Clearly, Respondent's fury has no bounds with her bold promise of retaliation against Nisha Bacchus. In fact, Respondent, on January 23, 2019, true to her word, forwarded a letter of representation in a Bar grievance filed by a former client of Ms. Bacchus, with the following:

I have accepted this case pro bono, meaning there will be no cost to you for my legal services.

(See **The Florida Bar's Composite Exhibit C**, which contains Nisha Bacchus' Supplemental Affidavit in Support of Petition for Injunction for Protection Against Stalking. Within that document, identified as Composite Exhibit B, is Ms. Krapacs' January 23, 2019 Client Engagement Letter for Judith Mach.)

The Bar would point out that under any other circumstance an attorney's handling of a matter on a pro bono basis is admirable and greatly encouraged. In this instance, the inescapable conclusion is that this Respondent's motivation is simply to hurt and damage Ms. Bacchus.

10. The Bar, and in strong agreement with this Court's harsh view of incivility, deems this Respondent's conduct to have exceeded any yet known

boundaries.² By waging a personal and public war on social media against attorneys representing clients, Ms. Krapacs has resorted to terrorist legal tactics. The practice of law, for attorneys Williams and Bacchus, should not subject them to guerilla warfare, and such behavior is the essence of conduct prejudicial to the administration of justice and great public harm. Additionally, Respondent's outrageous conduct only serves to perpetuate the public's perception that lawyers are uncivilized.

11. The salient facts are set forth below:

- a. Krapacs was in a personal relationship with Gregory Knoop, a non-lawyer and resident of Texas. Krapacs moved to Florida.
- b. In or about January 30, 2018, after Krapacs moved to Florida, she initiated a Petition for Domestic Violence Injunction against Knoop in Broward County, Florida, which resulted in a temporary injunction. Krapacs alleged that Knoop had previously abused her and was in fear of future abuse.
- c. Attorney Russell J. Williams represented Knoop in proceedings held before the Honorable Michael G. Kaplan, Broward Circuit Court Judge.

² Bar Counsel is intimately familiar with the Court's view of incivility as being the Bar attorney who handled matters related to Jeffrey Norkin. The Florida Bar v. Norkin, 132 So.3d 77 (Fla. 2013). The Florida Bar v. Norkin, 183 So.3d 1018 (Fla. 2018).

d. In or about July 24, 2018, the petition was dismissed by Krapacs.

e. Beginning on or about March 1, 2018, during and after the pendency of the petition, Krapacs began a social media blitz on Facebook, Instagram, LinkedIn, and by posting YouTube videos attacking and disparaging Williams and Judge Kaplan and insinuating a corrupt influence.

1) On or about March 1, 2018, Respondent posted on LinkedIn and stated, in pertinent part, with emphasis supplied:

- So, Russell J. Williams, ESQ sends me a letter threatening to FILE A MOTION FOR SANCTIONS AGAINST ME if I don't dismiss the domestic violence case within 21 days.
- **Old White Male Attorney #2** steps up to the plate to harass a domestic violence victim with yet another baseless legal treat. Classy.

(The above March 1, 2018 post is attached hereto as **The Florida Bar's Exhibit G.**)

2) On or about April 14, 2018, Respondent posted on LinkedIn and stated, in pertinent part, with emphasis supplied:

- **Oh, and opposing counsel blatantly, flat-out LIED on the record. The judge didn't bat an eye.**
- So I had to start all over again. I filed a new petition yesterday. I'm documenting the date, time, and name of every courthouse employee I speak with.

Something is really off here. #metoo #timesup
#domesticviolence #womensrights #keepfighting

- I've been inspired—and pissed off—by my bully ex-boyfriend and **his bully attorneys and their aggressive and intimidating legal tactics** after I confronted my ex about his past abuse of me.

(The above April 14, 2018 post is attached hereto as **The Florida Bar's Exhibit H.**)

Each of these statements begins by identifying Ashley Krapacs as Esq. and Owner at Ashley Ann Krapacs, PLLC and some conclude by identifying Ms. Krapacs as a Sexual Harassment Lawyer.

3) On or about April 21, 2018, Respondent posted on Facebook and stated, with emphasis supplied:

- Today, I got a recording of my hearing from last week. **I knew that how I had been treated, by opposing counsel and the judge, was bad, but DAMN.** All I can say is, I've always wanted to write a book. And, well, this book is writing itself. #metoo #timesup #nomore #endsexism #holymisogyny #lawyerlife #keepfighting #justicewillprevail

(The above April 21, 2018 post is attached hereto as **The Florida Bar's Exhibit I.** A copy of the transcript of the hearing dated April 12, 2018, to which Respondent referred in the above post, is attached hereto as **The Florida Bar's Exhibit J.**)

It is crystal clear that Judge Kaplan treated the Respondent with utmost dignity, courtesy and patience. Likewise, there was absolutely nothing concerning Mr. Williams' conduct warranting Respondent's public disparagement of both as treating Respondent badly.

4) Respondent, through her law firm, wrote an article which she posted on a blog entitled, "When You Don't Let Female Lawyers Talk, We'll Only Get Louder." (The April 23, 2018 article is attached hereto as **The Florida Bar's Exhibit K.**) The article, in good part, refers to the hearing held on April 12, 2018. (See **The Florida Bar's Exhibit J.**)

- Krapacs referred to Judge Kaplan and attorney Williams as "old white males."
- Krapacs accused the court of subtle bias, as clear as day.
- Krapacs claimed that an egregious exchange occurred.
- Krapacs stated that the court did not provide a valid explanation for why opposing counsel's motion was heard and Krapacs' motion was not.

* * *

Respondent's statements are deceitful and derogatory and with the intention of falsely portraying that she had been mistreated in court on April 12, 2018. A review of the transcript attached as **The Florida Bar's Exhibit J**, beginning at page 17 describes the events that actually occurred. Respondent filed a motion to amend without

seeking leave from the court and without setting the matter for hearing. The court patiently explained the procedure to the Respondent, who apologized for her lack of knowledge:

THE COURT: We're just going to address the petition that you filed. And I understand that there may be further proceedings depending on the ruling of the Court today, but we're going to be limited to that.

MS. KRAPACS: Sure. And I apologize, Your Honor, I did do a clerkship in D.C. Superior Court and the process that we followed that often motions that were filed in between hearing were done in chambers, and so I wasn't aware and I asked the clerks and they said - -

THE COURT: That's fine. You don't have to explain any further. That's okay.

- Respondent accused attorney Williams of lying in the hearing in this blog as well as in multiple other public posts based on the following actual exchange:

MS. KRAPACS: I'm sorry, did you just say - -

THE COURT: I understand.

MS. KRAPACS: I'm sorry, did opposing counsel say he never received that?

THE COURT: Well, the answer was - -

MR. WILLIAMS: I know it's been filed. I went to the clerk's office to obtain a copy. They would not give it to me because they would not, because I'm not attorney of record.

MS. KRAPACS: I'd like to confirm for the record I emailed it to - -

THE COURT: One moment. Don't interrupt, please. Go ahead.

MR. WILLIAMS: I never got - - I got the motion to amend. Yes, the petitioner is right, I did get the motion to amend. She did email it to me.

(See **The Florida Bar's Exhibit J, page 25.**)

- It is outrageous that Respondent paints Mr. Williams as a liar based on this exchange.
- Respondent continued to disparage Judge Kaplan and Mr. Williams when she stated the following:

The Old Boy's Club is alive and well in 2018. I don't think the judge who tried to silence me is a bad man. He likely would say and probably believes that he is not biased or sexist. However, his treatment of me proves otherwise. We wouldn't have even been in that hearing if he had acknowledged and acted on my motion for leave to amend the petition.

- Respondent has accused the court of bias and membership in the "Old Boy's Club" when she herself acknowledged her own lack of competence and knowledge of procedure leading to her apology.

5) On or about May 10, 2018, Respondent, through her law firm, posted an article which she wrote entitled, "Bad Attorney Behavior: If You See It, Report It." (The May 10, 2018 article is attached hereto as **The Florida Bar's Exhibit L.**) Respondent stated the following, in pertinent part:

- Mr. Williams then proceeded to lie on the record numerous times during the one hearing that was held in the case on April 12, 2018.

- Boo hoo. He knows that truth is an absolute defense to defamation and that he can't do a damn thing about me calling him out for lying.
- This man has been practicing for over 30 years. I cannot fathom how many female domestic violence victims and opposing counsel have been sandbagged and railroaded by this bully.

* * *

Much of this article publicly addresses the Bar grievance that Ms. Krapacs filed against Mr. Williams, which was summarily dismissed by the Bar.

f. Due to Respondent's unrelenting public social media attacks, on July 26, 2018, attorney Williams filed a lawsuit against Ms. Krapacs for Libel, Slander, Malicious Prosecution and Injunctive Relief. Attorney Nisha Bacchus represents Mr. Williams. (See **The Florida Bar's Exhibit E.**)

1) In addition to the other disparaging attacks, Respondent posted YouTube videos and launched additional assaults.

a. A transcript of a YouTube video of Respondent, which she posted on or about July 31, 2018 after receipt of the lawsuit, is attached hereto as **The Florida Bar's Exhibit M.** In it, Respondent stated, in pertinent part:

- I have been laughing a lot. I can't stop laughing since I read this complaint that has been filed against me on me [sic] behalf of Russell J. Williams. This complaint [indicating]. Russell

J. Williams of Williams, Hilal, Wigand, Grande Law Firm. (Page 3)

- Twenty-five pages of garbage, lies, fake news...riddled with lies and other nontruths...obscene. (Page 4)
- ...lying on the record is just what Mr. Williams does best...I have the court recording and the official court transcript of that hearing that confirms his lies. (Page 4)
- More lies. This guy just - - he cannot get enough of lying in formal proceedings. I mean, man, like, it's just, it's a lie. (Page 6)
- ...he also whines that I call him a moron and a sexist and a bully. Well, sorry - - I'm not sorry, but you are all of those things. (Page 6)
- Um, you know, and there is - - there is another option here. There is a really easy option. You could, you know, just stop being a dick. Like, that's a really simple solution, just don't be a dick. Um, but men like Russell J. Williams want to have their cake and eat it too. Listen, when you have been having your cake and eating it too for three decades and it worked and it has made you a lot of money, I guess it would piss you off when someone comes along and makes it clear that that just isn't going to work anymore.

You know, it pisses him off that he can't just keep acting a fool and then pretending to be a good guy. He wants to act like a baby, bully people around, lie and cheat his way through cases and then pretend like he's a decent human being. Sorry, that's just not an option anymore. It's just not. (Pages 7-8)

- If you want to take cases where you're going after a domestic violence survivor in a completely frivolous bullshit lawsuit, you cannot also claim to support women's rights. You just can't. I mean, you can do whatever you want, but the math just doesn't add up. And I'm going to call you out. So, Nisha Bacchus, you're a backstabbing traitor. I almost feel bad for you, almost. Almost. Because he's playing her. He is playing her like a fucking fiddle. He knew he was going to have a hard time finding any attorney who was actually going to file this piece of garbage. He knew it. So what did he do? He found someone desperate for work, someone so hard up for cases that she would do anything for a quick buck. And this much is obvious to me. It's really clear from her website.

For one thing, she uses "our firm", "our" this, "our" that, all throughout the website. And you can - - I mean, it's just one lawyer since, what I can tell, 2011. So it is seven years and you haven't been able to - - you have been using a plural pronoun but haven't been able to bring another lawyer on board. Like, "our". Okay. You and your paralegal. Um, so it is obvious from her website.

She also claims to have multiple departments of her law firm and she's the self-designated head of all these departments. I guess the competition wasn't really steep. Um, but, congrats.

Also, she's a door lawyer. Which is basically a lawyer who takes anything that walks in the door in any area of law.
(Pages 10-11)

- Because you can't do every area of law and do them all well. You just can't. Some people try and they end up like Nisha Bacchus who are so hard up that they'll take anything, including shit like this. So I almost feel bad for her because he's playing her. It is really obvious from the way that she presents herself that she'll take anything if the price is right. Or even if it's not. (Page 12)
- So I almost feel bad for her but not quite. At the end of the day no matter how convincing and manipulative he is, it is still her choice to represent him and it's a choice that she'll live with for the rest of her life. Um, the choice to file this utter bullshit complaint. The choice to go after a rape survivor when you claim to be pro women's rights. Are you fucking kidding me? The choice to sell out to make a quick buck. It's her choice. Her actions have spoken volumes about the kind of person she really is. And that is a woman who does not like women very much. So, sorry, honey, you're exposed. (Pages 13-14)
- Everyone has a price and Russell J. Williams figured out Nisha's. But, girl, it's going to cost you. It's going to cost you, girl. You made your bed, so lay in it. Hope you're comfortable. (Page 15)
- So you get to choose your branding. And your choice of branding is representing misogynist pigs, misogynist bullies like Russell J. Williams, that's not good branding. (Page 16)

2) Although Respondent continued to attack Mr. Williams, her focus, in good part, shifted to Nisha Bacchus, who represents Mr.

Williams. Respondent launched a cyberstalking attack which “tagged”³ Ms. Bacchus personally, as well as her law firm.

a. July 31, 2018 Facebook and Instagram posts:

- Nisha Elizabeth Bacchus. Damn, girl. You must be hard up for new cases to take on a piece of garbage like Russell J. Williams. And you promote yourself as being “pro-women’s rights.” How do you sleep at night? #sellout #womanhater #metoo #timesup #endrapeculture #endsexism #endmisogyny

(The above July 31, 2018 post is attached hereto as **The Florida Bar’s Exhibit N.**)

- Ashley Ann Krapacs, PLLC

Ya’ll, social media is no joke. You want to act a fool and be a jerk to people? Go right ahead. But don’t expect people not to call you out for it. I’m talking to you, **Nisha Elizabeth Bacchus**. The choices you make in life form what becomes your personal brand. What do your choices say about you? #beempowered #metoo #timesup #womensrights #humanrights #domesticviolence #calledout #exposed #notafraid #sellout #traitor #endsexism #endmisogyny

³ Tags allow social media users to engage an individual, business or any entity with a social profile when they mention them in a post or comment. In Facebook and Instagram, tagging notifies the recipient and hyperlinks to the tagged profile. Here Ms. Krapacs’ obvious motivation was to make certain that Ms. Bacchus knew the threats and insults being launched by Ms. Krapacs. This behavior caused Ms. Bacchus tremendous upset and distress. (See **The Florida Bar’s Exhibit B.**)

(The above July 31, 2018 post is attached hereto as **The Florida Bar's Exhibit O.**)

- Ashley Ann Krapacs, Esq.

Russell J. Williams, partner at @WHWG_LAW, sued me for #defamation. Way to harass a survivor of #domesticviolence and #rape, you pig! Oh, and #TRUTH is an absolute defense to defamation, moron, so good luck with that. Smfh. #metoo #timesup #frivolous #vindictive #bully

(The above July 31, 2018 post is attached hereto as **The Florida Bar's Exhibit P.**)

b. On or about August 8, 2018, Respondent posted a blog about Ms. Bacchus and her firm on Respondent's firm's website utilizing Ms. Bacchus' photo. This post also continued to disparage Mr. Williams and Judge Kaplan. Those parts pertinent to Nisha Bacchus are set forth below:

- So I'm admittedly disheartened to learn that a female has joined that fight. But again, everyone can be bought.
- The defamation suit is intended only to harass and intimidate me. Mr. Williams knows it. And so does Nisha Bacchus. But she sold out anyway. She's helping a hateful bully continue to torment me. She's helping a sexist pig continue to psychologically torture me. It's gotta

be a painful existence to live as a woman and also hate women so much at the very same time.

- The website of Nisha Bacchus tells me everything I need to know about this woman: she's thirsty for work. So hard up, she'll engage with a scumbag like Russell J. Williams. It's pathetic, really.
- What a fraud. She pretends to care about women. She pretends to support women's rights issues. She pretends to care about women who have been abused.
- In a lot of ways, Nisha Bacchus is just like Russell J. Williams: a bully who wants to act like an asshole, but then pretend like she's something she's not, and just try to avoid she getting called out for who she really is. Well, sorry, sweetie, but you can't have it both ways. If you want to take clients like Russell J. Williams, you can't also claim to support women's rights and the #metoo movement. That math just doesn't add up. And I will call you out and scream it from the rooftops: Nisha Bacchus is nothing more than insecure, hateful, jealous woman who hates women.

See you in court, asshole.

(The above August 8, 2018 post is attached hereto as **The**

Florida Bar's Exhibit Q.)

c. On or about October 6, 2018, Respondent posted a photo of protestors in front of the U.S. Supreme Court and stated the following, in pertinent part:

- My body is mine. My life matters. My story matters. And FUCK anyone who says it doesn't.

Fuck Gregory Knoop.

Fuck Russell J. Williams.

Fuck Williams Hilal Wigand Grande law firm.

Fuck Nisha Bacchus.

Fuck Bacchus Law.

Fuck David Benowitz.

Fuck Seth Price.

Fuck Price Benowitz law firm.

Fuck Kevin Tynan.

Fuck James Drakeley.

Fuck Kenneth Patterson.

Fuck Hiersche, Hayward, Drakeley & Urbach law firm.

Fuck everyone who perpetuates #rapeculture. Fuck everyone who perpetuates #misogyny. Fuck everyone who perpetuates violence against women.

You might get Kavanaugh. But you've waged a war that you cannot win. #Progress is coming whether you like it or not. And you will be held accountable. I will never stop fighting. #metoo #timesup

(See **The Florida Bar's Composite Exhibit C**, which contains Nisha Bacchus' Supplemental Affidavit in Support of

Petition for Injunction for Protection Against Stalking. Within that document, identified as Composite Exhibit D, is the post containing the profanities.)⁴

d. On or about October 22, 2018, Respondent posted on Facebook and stated, in pertinent part:

- ...she filed several things and provided me with absolutely no notice, even though I'm listed in the court's e-service system. No idea where this lunatic went to law school, but it must have been a school that doesn't put a whole lot of emphasis on, ya know, THE LAW, and just basic due process. Smfh. #metoo #timesup #bullies #amateurhour #womensrights #equalrights #endviolenceagainstwomen #endrapeculture #endthepatriarchy

(The above October 22, 2018 post is attached hereto as

The Florida Bar's Exhibit R.)

e. On October 25, 2018, Respondent posted a photograph from a film in which a shotgun is pointed at the perpetrator. This post terrified Ms. Bacchus because of its violent nature and was a basis for her seeking an injunction for stalking. (See **The Florida Bar's Composite Exhibit C.**)

⁴ The Florida Supreme Court Oath of Admission, which highlights civility, states that members of the Bar shall "abstain from offensive personality."

when opposing counsel tries to use
the same exact trick you saw in
your last case



15 likes

ashleykrapacs Ya & I just can't with this diva. SIMPLY CANNOT! Nisha Bacchus clearly isn't a fan of my social media. Today, she tells my attorney that she's going to sue me (more) for my recent posts about her. Apparently, she's gone through all the contents of her Bag of Tricks to Mindfuck Sexual Assault Survivors, and now she has to keep reusing the contents. She's already tried using her personal connections at the Florida Bar to silence me. Didn't work. She tried using her connections at the court to silence me. Didn't work. She and her client, Russell J. Williams of Williams Hilal Wigand Grande law firm, even threatened to use personal connections at the state's attorneys office to have me arrested. Even then, I refused to be silenced. This lady is OUT OF CONTROL. Nothing but an evil b*tch. Bring it, diva. NOTHING they can do to me is going to silence me from speaking the truth about what people like them do to vulnerable #sexualassaultsurvivors #metoo #timesup #womensrights #believesurvivors #humanrights #enoughisough

f. On or about October 25, 2018, Respondent posted a statement to Facebook accusing The Florida Bar, the court and the State Attorney's Office of being corruptly influenced by Nisha Bacchus. She stated, in pertinent part:

- She's already tried using her personal connections at the Florida Bar to silence me. Didn't work. She tried using her connections at the court to silence me. Didn't work. She and her client, Russell J. Williams of **Williams, Hilal, Wigand & Grande, PLLC.** law firm, even threatened to use personal connections at the states attorney office to have me arrested.

Even then, I refused to be silenced. This lady is
OUT OF CONTROL. Nothing but an evil bully.
Bring it, diva. NOTHING they can do to me is
going to silence me from speaking the truth
about what people like Nisha Bacchus and
Russell J. Williams do to vulnerable
#sexualassaultsurvivors. #metoo #timesup
#womenrights #believesurvivors #humanrights
#enoughisenough

(The above October 25, 2018 post is attached hereto as

The Florida Bar's Exhibit S.)

g. On or about October 26, 2018, Respondent posted a statement to Facebook again accusing The Florida Bar of being corruptly influenced by Nisha Bacchus. Respondent expressing these accusations publicly in the guise of “an opinion” does not protect Respondent from both the scrutiny and sanction of this Court and the Bar. She stated, in pertinent part:

- I heard from the Florida bar today regarding the multiple ethics complaints that have been filed against me by Russell J. Williams (partner at Williams, Hilal, Wigand & Grande, PLLC. Law firm) and my ex, Gregory Knoop. Given the timing of the email and that I hadn't heard anything from them at all for weeks, I have to assume that it's not a coincidence. It is solely my opinion, but I have to believe Nisha is behind it.

- And then he [sic] fact that there's obviously a LOT going on behind the scenes that I'm not privy to is incredibly upsetting. This is ya world we live in. It's 2018, and young female attorneys are held to an entirely different standard than the Old White Males. It may cost me my bar license to keep writing publicly about the state of this field, but I don't feel I have any other choice.

(The above October 26, 2018 post is attached hereto as

The Florida Bar's Exhibit T.)

h. On or about November 29, 2018, Respondent posted a statement to Facebook with regard to the pending defamation lawsuit. She stated, in pertinent part:

- As long as the litigation continues, I look forward to embarrassing both of these bullies as I lay the paper trail that clearly demonstrates what side of history these two attorneys are on. And hint: it's not the good side!

(The above November 29, 2018 post is attached hereto as

The Florida Bar's Exhibit U.)

i. On or about December 5, 2018, Respondent posted a statement to Facebook which gave a glimpse of her intentions with regard to further harming Ms. Bacchus.

- ...and this week, I got some unsavory information about Nisha Bacchus that is a total game changer. Stay tuned for that.

(The above December 5, 2018 post is attached hereto as **The Florida Bar's Exhibit V.**)

j. On or about December 19, 2018, Respondent posted a statement to Facebook attacking Ms. Bacchus' filing of a Request to Produce, in her representation of Mr. Williams. Ms. Krapacs stated the following, in pertinent part, with emphasis supplied:

- These tactics do nothing but keep those who are powerless and vulnerable stuck, while they make greedy, evil people like Nisha Bacchus rich. (**How's that BMW treating you, baby?**)

(See **The Florida Bar's Composite Exhibit C**, which contains Nisha Bacchus' Supplemental Affidavit in Support of Petition Against Stalking. Within that document, identified as Composite Exhibit D, is Ms. Krapacs' December 19, 2018 post.)

This post again put Ms. Bacchus in physical fear since Ms. Krapacs publicly exposed the type of vehicle that Ms. Bacchus drives. In Ms. Bacchus' Petition for Temporary Injunction, she stated:

The December 19, 2018 posting was extremely alarming as Respondent made reference to the type of vehicle that I drive. I was terrified when I was alerted by this positing [sic] as I have never met Respondent, nor do we have any friends or colleagues in common with her. I reached out to her attorney, Patricia Acosta, Esq., who is representing Respondent in the civil matter and expressed my concerns via email. I do not know if Ms. Acosta ever addressed this matter with Respondent. This made me extremely uncomfortable and anxious. I reported this posting immediately to the Florida Bar.

(See **The Florida Bar's Composite Exhibit C.**)

12. On February 1, 2019, Judge Moon granted an indefinite Final Judgment of Injunction for Protection Against Stalking against Ashley Krapacs as a result of her actions toward Nisha Bacchus. (A copy of the court's order dated February 1, 2019 is attached hereto as **The Florida Bar's Exhibit W.**)

13. Within three hours of the conclusion of the hearing and issuance of the Injunction, Ms. Krapacs sent the following e-mail to Bar Counsel:

Received Fri 02/01/2019 4:05PM
From Ashley Krapacs
Subject DVCE 19-000341 Case Update
To Sum, Alice; Casco, Maria; Lazarus, Randi
cc
bcc

Good Afternoon,

Today, Judge Moon issued a limited permanent injunction in the above-referenced case. My attorney has a copy of the order, and I will send it to you as soon as I receive a copy from her. I will be appealing the ruling as soon as I secure the right appellate lawyer.

Further, I have reason to believe that Ms. Bacchus not only abandoned her former client, Ms. Mach, in Ms. Mach's divorce case, I also have reason to believe that Ms. Bacchus unlawfully filed liens against Ms. Mach's property. I need to conduct further research before I can say definitively what kind of case Ms. Mach may have against Ms. Bacchus, but I will continue to provide updates as required. Please let me know if you have any questions.

Have a wonderful weekend.

Best,

Ashley

--

Regards,

Ashley Ann Krapacs
New York Bar #5389309
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14. The e-mail establishes that Ms. Krapacs intends to continue with her attempts to crucify Ms. Bacchus. In fact, she again makes unsupported allegations to The Florida Bar of "unlawful" conduct by Ms. Bacchus before admittedly researching the issue.

Wherefore, by reason of the foregoing, Respondent is causing great public harm and has violated the following Rules Regulating The Florida Bar: 3-4.3 [The standards of professional conduct required of members of the bar are not limited to the observance of rules and avoidance of prohibited acts, and the enumeration of certain categories of misconduct as constituting grounds for discipline are not all-inclusive, nor is the failure to specify any particular act of misconduct to be construed as tolerance of the act of misconduct. The commission by a lawyer of any act that is unlawful or contrary to honesty and justice may constitute a cause for discipline whether the act is committed in the course of the lawyer's relations as a lawyer or otherwise, whether committed within Florida or outside the state of Florida, and whether the act is a felony or a misdemeanor.]; 4-4.4(a) [In representing a client, a lawyer may not use means that have no substantial purpose other than to embarrass, delay, or burden a third person or knowingly use methods of obtaining evidence that violate the legal rights of such a person.]; and 4-8.4(d) [A lawyer shall not engage in conduct in connection with the practice of law that is prejudicial to the administration of justice, including to knowingly, or through callous indifference, disparage, humiliate, or discriminate against litigants, jurors, witnesses, court personnel, or other lawyers on any basis, including, but not limited to, on account of race, ethnicity, gender, religion, national origin, disability, marital

status, sexual orientation, age, socioeconomic status, employment, or physical characteristic.].

WHEREFORE, based on the aforementioned facts and evidence, the Bar asserts the Respondent has caused, or is likely to cause, immediate and great harm to clients and/or the public and that immediate action must be taken for the protection of the Respondent's clients and the public. Therefore, pursuant to R. Regulating Fla. Bar 3-5.2, The Florida Bar respectfully requests this Court to:

A. Suspend Respondent from the practice of law until further order of this Court.

B. Order Respondent to accept no new clients from the date of this Court's order and to cease representing any clients after 30 days from the date of this Court's order. Within the 30 days from the date of this Court's order, Respondent shall wind down all pending matters and shall not initiate any litigation on behalf of clients. Respondent shall withdraw from all representation within 30 days from the date of this Court's order. In addition, Respondent shall cease acting as personal representative for any estate, as guardian for any ward, and as trustee for any trust and will withdraw from said representation within 30 days from the date of this Court's order and will immediately turn over to any successor the complete

financial records of any estate, guardianship or trust upon the successor's appointment.

C. Order Respondent to furnish a copy of the suspension order to all clients, opposing counsel, courts before which Ashley Ann Krapacs is counsel of record, and state, federal, or administrative bars of which Respondent is a member, as required by Rule 3-5.1(h) of the Rules of Discipline of The Florida Bar and to furnish Staff Counsel with the requisite affidavit listing all clients, opposing counsel, courts and state, federal or administrative bars so informed within 30 days after receipt of the Court's order.

D. Order Respondent to refrain from withdrawing or disbursing any money from any trust account related to Respondent's law practice until further order of this Court, a judicial referee appointed by this Court or by order of the Circuit Court in an inventory attorney proceeding instituted under R. Regulating Fla. Bar 1-3.8, and to deposit any fees, or other sums received in connection with the practice of law or in connection with the Respondent's employment as a personal representative, guardian or trustee, paid to the Respondent after issuance of this Court's order of emergency suspension, into a specified trust account from which withdrawal may only be made in accordance with restrictions imposed by this Court. Further,

Respondent shall be required to notify Bar Counsel of The Florida Bar of the receipt and location of said funds within 30 days of the order of emergency suspension.

E. Order Respondent to not withdraw any money from any trust account or other financial institution account related to Respondent's law practice or transfer any ownership of any real or personal property purchased in whole or in part with funds properly belonging to clients, probate estates for which Respondent served as personal representative, guardianship estates for which Respondent served as guardian, and trusts for which Respondent served as trustee without approval of this Court, a judicial referee appointed by this Court or by order of the Circuit Court in an inventory attorney proceeding instituted under R. Regulating Fla. Bar 1-3.8.

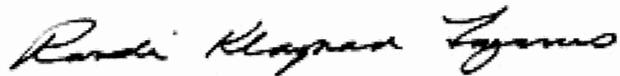
F. Order Respondent to notify, in writing, all banks and financial institutions where the Respondent maintains an account related to the practice of law, or related to services rendered as a personal representative of an estate, or related to services rendered as a guardian, or related to services rendered as a trustee, or where Respondent maintains an account that contains funds that originated from a probate estate for which Respondent was personal representative, guardianship estate for which respondent was guardian, or trust for which Respondent was trustee, of the provisions of this

Court's order and to provide all the aforementioned banks and financial institutions with a copy of this Court's order. Further, Respondent shall be required to provide Bar Counsel with an affidavit listing each bank or financial institution Respondent provided with a copy of said order.

G. Order Respondent to immediately comply with and provide all documents and testimony responsive to a subpoena from The Florida Bar for trust account records and any related documents necessary for completion of a trust account audit to be conducted by The Florida Bar.

H. And further to authorize any Referee appointed in these proceedings to determine entitlement to funds in any trust account(s) frozen as a result of an Order entered in this matter.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I certify that this document has been E-filed with The Honorable John A. Tomasino, Clerk of the Supreme Court of Florida, with a copy provided via e-mail to Respondent, Ashley Ann Krapacs, at krapacsaa@gmail.com; and that a copy has been furnished by United States Mail via certified mail No. 7017 1070 0000 4774 1589, return receipt requested, to Respondent, Ashley Ann Krapacs, whose record Bar address is 401 East Las Olas Blvd., Suite 1400, Fort Lauderdale, FL 33301-2218; and via email to Randi Klayman Lazarus, Bar Counsel, at rlazarus@floridabar.org and mcasco@floridabar.org, on this 20th day of February, 2019.

Adria E. Quintela

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**NOTICE OF DESIGNATION OF PRIMARY AND SECONDARY E-MAIL
ADDRESSES**

PLEASE TAKE NOTICE that Bar Counsel in this matter is Randi Klayman Lazarus, Bar Counsel, whose address, telephone number and primary and secondary e-mail addresses are The Florida Bar, Ft. Lauderdale Branch Office, Lake Shore Plaza II, 1300 Concord Terrace, Suite 130, Sunrise, Florida 33323, (954) 835-0233, rlazarus@floridabar.org and mcasco@floridabar.org. Respondent need not address pleadings, correspondence, etc. in this matter to anyone other than bar counsel and to Adria E. Quintela, Staff Counsel, The Florida Bar, Lakeshore Plaza II, 1300 Concord Terrace, Suite 130, Sunrise, Florida 33323, aquintel@floridabar.org.

MANDATORY ANSWER NOTICE

RULE 3-5.2(a), RULES OF DISCIPLINE, EFFECTIVE JULY 1, 2012,
2004, PROVIDES THAT A RESPONDENT SHALL ANSWER A COMPLAINT.



Instagram



attorneyproblems



when opposing counsel tries to use the same exact trick you saw in your last case



3,759 likes

attorneyproblems Not this time Satan 🤩

View all 56 comments



1 aware of that?

2 A. No.

3 Q. So it was your understanding that
4 those words at the top came from the
5 respondent?

6 A. Yes, it was my -- it was my
7 understanding that the entire post -- I mean,
8 obviously I know she didn't make the picture
9 because the picture came from the movie. But
10 it was my understanding, looking at this, I
11 interpreted that she put the post together,
12 that this post wasn't from another social
13 media platform.

14 Q. Okay. And had you noticed the
15 @attorneyproblems monicker in the upper
16 left-hand corner of the photograph?

17 A. No, not until you just pointed it
18 out.

19 Q. And I notice in your -- it's Florida
20 Bar's 16, the narrative that you wrote, that I
21 think you attached to your petition for the
22 injunction.

23 A. Yes.

24 Q. -- that you made reference to the
25 fact that this was an image that included a

1 shotgun.

2 Is it your understanding that that
3 picture is of a child with a shotgun?

4 A. Yes, that's what it looks like. It
5 looks like a shotgun.

6 Q. Okay. And I get the sense you are
7 aware that this image came from the Home Alone
8 movie?

9 A. Yes.

10 Q. Did you see that movie before you saw
11 this meme?

12 MS. LAZARUS: Objection, Your Honor.
13 This is really silly.

14 THE COURT: Okay. Does it matter
15 whether she saw the movie? She is
16 familiar with it.

17 MR. HOPKINS: I'm just trying to get
18 at where she came up with the shotgun.
19 It's as simple as that.

20 THE COURT: Where she came up with
21 it?

22 MR. HOPKINS: Yes, why she thinks it
23 was a shotgun.

24 THE COURT: Okay.

25

1 BY MR. HOPKINS:

2 Q. I can move on and just ask you that.
3 Why did you think that was a shotgun?

4 A. Because it looks like a shotgun.
5 It's got a long barrel, and the way he is
6 holding it. I've shot a shotgun before, so I
7 know what a shotgun looks like. And when I
8 look at this, it looks like a shotgun.

9 Q. Right. You sat through a concealed
10 weapons class; right?

11 A. I have.

12 Q. And you have a concealed weapon's
13 permit?

14 A. I do.

15 Q. And you are a responsible gun owner?

16 A. I am.

17 Q. And you think it's good for a
18 responsible gun owner to not necessarily know
19 the difference between a bb gun and shotgun?

20 MS. LAZARUS: Objection, Your Honor.

21 I don't know what the right objection is
22 to that.

23 THE COURT: Sustained. We don't need
24 to go down this road.

25 The bottom line is, if she thought it

1 was a shotgun and it wasn't a shotgun,
2 then you can talk about that if you feel
3 the need to, but...

4 MR. HOPKINS: I'll move on.

5 BY MR. HOPKINS:

6 Q. Leila Campagnuolo?

7 A. Campagnuolo.

8 Q. Thank you.

9 That used to be one of your former
10 clients; correct?

11 A. Yes.

12 Q. I'm not going to get into any
13 attorney-client communications or nature of
14 the case, but I have one question for you on
15 this: Do you recall, in whatever service you
16 may have provided for her Leila, that you
17 attended a mediation with her?

18 A. Yes.

19 MS. LAZARUS: Objection; relevance.

20 THE COURT: What is the relevance?

21 MR. HOPKINS: I will bring that back
22 up later. That's the last of my questions
23 on that.

24 MS. LAZARUS: Your Honor, I move to
25 strike that. It's a bench trial, but I

1 subject in the world?

2 A. The percentage of the time I spoke
3 about Nisha, maybe 10 percent.

4 Q. Are you aware that Ms. Krapacs had,
5 for a period of time in 2018, and a day in
6 2019, had posted things on the Internet about
7 other lawyers? Had you seen any of that?

8 MS. LAZARUS: Objection; relevance.

9 THE WITNESS: I've seen --

10 THE COURT: Hold on.

11 MS. LAZARUS: Objection; relevance.

12 THE COURT: Overruled.

13 THE WITNESS: Okay. I've seen one
14 picture. She told me she had posted
15 things out of desperation because she was
16 really being attacked. She was trying to
17 seek the right avenues, but she wasn't
18 really getting help.

19 BY MR. HOPKINS:

20 Q. Okay. So did you, at any point in
21 time, go on the Internet and see any of those
22 posts that Ms. Krapacs put up about lawyers
23 and the law?

24 A. I remember one about a movie, the
25 Home Alone movie.

1 Q. And did what she wrote make you think
2 that the Home Alone movie meme that you saw,
3 did that make you think less of the judicial
4 system?

5 MS. LAZARUS: Objection, Your Honor.

6 THE COURT: What is the relevance of
7 that?

8 MR. HOPKINS: Well, one of the issues
9 in this case is the rules talk about
10 whether somebody -- whether a lawyer does
11 something that brings a negative view onto
12 the court system. And the Bar spent some
13 time yesterday asking ultimate question
14 issues to two witnesses.

15 I think some question here, and I
16 only have maybe two of those --

17 THE COURT: Okay, I'll allow it.

18 MR. HOPKINS: Thank you.

19 THE WITNESS: I'm trying to
20 understand the question.

21 BY MR. HOPKINS:

22 Q. I'll ask you the question again.

23 You said that you saw a Home Alone
24 post on the Internet that Ms. Krapacs had put
25 on. In reading or reviewing that post, did

1 that change your attitude about how you viewed
2 the court system?

3 MS. LAZARUS: Your Honor, I'm going
4 to renew the objection because, first of
5 all, part of -- and the biggest part of
6 the testimony concerning that photograph
7 was the fear that it instilled in Nisha
8 Bacchus.

9 Whether Ms. Mach thinks that it
10 caused disrepute to the legal profession
11 is really not relevant.

12 It's your determination ultimately
13 whether all of this constitutes conduct
14 prejudicial to the administration of
15 justice.

16 She is certainly not here as an
17 expert, which she couldn't be anyway, and
18 I don't see how her opinion as to that is
19 relevant to these proceedings.

20 THE COURT: Hang on. I'm sorry, I
21 didn't mean to cut you off, but let's just
22 do this. Why don't you talk about seeing
23 those posts in the context of Ms. Krapacs'
24 character. Because she is here as a
25 character witness for Ms. Krapacs; right?

1 So maybe that would be more germane to the
2 topic at hand.

3 In other words, did she think any
4 less of her because she posted them? Did
5 she feel like she was maligning the
6 justice -- I'm not going to tell you
7 questions to ask, but do you see what I'm
8 saying?

9 MR. HOPKINS: I do.

10 THE COURT: Thank you.

11 MR. HOPKINS: Okay, Your Honor.

12 BY MR. HOPKINS:

13 Q. Let me change my question.

14 We were talking about the Home Alone
15 post. Did that change -- affect your opinion
16 of Ms. Krapacs?

17 A. I thought it was funny, and I can
18 relate to being frustrated over that. And
19 it's a kid's movie, so I don't understand --

20 MS. LAZARUS: Objection, Your Honor;
21 relevance. Again, now she is giving an
22 opinion as to whether it's a kid's movie.

23 THE COURT: Overruled.

24 THE WITNESS: It's not even a real
25 gun. I mean, she followed her in the

1 bathroom yesterday. I don't understand --

2 MS. LAZARUS: Objection, Your Honor.

3 THE COURT: Overruled. Go ahead.

4 BY MR. HOPKINS:

5 Q. Who followed -- you were here in the
6 courthouse yesterday prepared to testify?

7 A. Yes. Nisha followed her.

8 Q. I have to ask questions so I can get
9 answers.

10 So you were here yesterday. Was
11 there a period of time you were out in the
12 hallway?

13 A. Yes.

14 Q. Was there a period of time you saw
15 Ms. Krapacs and Ms. Bacchus?

16 A. Sure.

17 Q. Was there a period of time you saw
18 them together, within close proximity of each
19 other?

20 A. Yes, sure.

21 Q. Tell me an instance where you saw
22 them in close proximity of each other
23 yesterday.

24 A. Ashley was in the bathroom. I didn't
25 even know she was there, you know. But I went

1 minutes.

2 THE COURT: All right. Let's keep
3 going.

4 BY MR. HOPKINS:

5 Q. I want to very briefly -- we are
6 going to talk about this one topic and then
7 move to something else, but the topic I want
8 to talk about are the two posts in particular
9 that you had made, so that we can get, sort
10 of, your perspective on it.

11 The first one is the Home Alone meme.

12 Where did you get the meme itself,
13 the picture and the caption above it? Where
14 does that come before?

15 A. Like I said earlier, I'm a big user
16 of social media. I follow a lot of different
17 types of accounts. This is @attorneyproblems,
18 is the Instagram handle. It's just a
19 humorous, you know, lawyer/law-themed
20 Instagram account. They post really funny
21 content and have tens of thousands of
22 followers. And it's actually run by a
23 litigation firm in California.

24 So I was on Instagram one day, just
25 kind of going through my feed and I saw --

1 Q. Let me stop you real quick. I'm
2 sorry. The @attorneyproblems, the humorous
3 posts, is it all lawyer-focused?

4 A. It's all lawyer-focused, yes.

5 Q. So go ahead. What was your intent
6 with the Home Alone post?

7 A. Around that period of time, I was
8 hearing a lot more of the same threats that
9 had already been launched against me, so I saw
10 that and I connected with it.

11 I thought it was humorous. Something
12 like 4,500 other people, presumably mostly
13 lawyers, had liked it. And so I thought it
14 was funny. I screenshot it, and at some
15 point, I reposted it.

16 Q. Did you tag anybody on that?

17 A. Not in the Instagram -- no, I didn't.
18 No.

19 Q. Was your intent to be threatening?

20 A. Not at all. In hindsight, okay, it
21 was somewhat tasteless, but, again, 4,500
22 other people saw it and didn't feel the need
23 to file cases against the law firm in
24 California.

25 I thought it was humorous, an

1 eight-year-old boy with a BB gun. Again,
2 somewhat unprofessional, tasteless, but I
3 thought it was funny.

4 I didn't write that caption, but I
5 thought it was humorous. And it related to
6 what was happening with the threats that were
7 being launched against me by Russell and
8 Nisha.

9 Q. In a different post in December, as
10 one of the Bar exhibits, you made reference to
11 Ms. Bacchus driving a BMW.

12 Do you recall that?

13 A. Yes.

14 Q. And how did you come to learn that
15 she drove a BMW?

16 A. Leila and I were having a
17 conversation at some point and it came up.
18 Leila said something about -- she was telling
19 a story, and it was in the context of that
20 story, that she thought she had seen Nisha's
21 car somewhere. She said, "You know, I pulled
22 up somewhere and saw this BMW, and looked like
23 Nisha's."

24 Q. Where is your office in Fort
25 Lauderdale? Before you were suspended, where

From: Lazarus, Randi [mailto:rlazarus@floridabar.org]
Sent: Wednesday, March 13, 2019 3:19 PM
To: Hopkins, Christopher
Cc: Casco, Maria
Subject: Krapacs ES

Hi Chris,

I thought that our conversations over the last two days have been productive.

Please see below an e-mail dated March 13, 2019 sent by your client at 1:40 p.m. to The Florida Bar with regard to her representation of Ms. Mach, which is counterproductive, in my opinion. This e-mail was sent shortly after our hearing concluded. Your client has referred to the order of the Florida Supreme Court as an "ex parte order". The Petition for Emergency Suspension was copied to your client when it was filed, as was the order of the Florida Supreme Court. It seems to me that your client's reference is a jab at the process, which is the some of the same type of conduct, as was engaged in before, but more subtle. I wanted to bring this to your attention.

I was referring to the response requested by Mr. Wilhelm on March 4, 2019 -- to be provided by March 6, 2019.

With regard to the term "ex parte", it is defined as with one party present. There was no purpose for the use of that term, other than to suggest that something unlawful has occurred. There were other instances referenced in the Bar's petition in which Ms. Krapacs publicly stated her belief that there were forces behind the scenes connected to the Bar that were improperly facilitating the prosecution. As to the use of those words, I do not take personal umbrage at anything in the process. If it was not Ms. Krapacs intention to suggest an impropriety, its use is consistent with referring to an attorney, like Williams, reaching out, as required by FS 57.105 and being accused of being threatening. It is an irresponsible and problematic manner of expression.

Thank you for the information concerning the evaluation. I appreciate your efforts at expediency.

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From: Lazarus, Randi [mailto:rlazarus@floridabar.org]
Sent: Thursday, March 14, 2019 8:24 PM
To: Hopkins, Christopher; Casco, Maria
Cc: Hopkins, Christopher
Subject: RE: Krapacs ES

Hi Chris,

Yes, I was referring to what you have highlighted.

As to your client's use of the term, "ex parte order", and in light of its common usage among the bench and bar, I remain convinced that your client was being deliberate and biting, as I have witnessed in many of her writings. Again, there was not any reason to modify the word "order" in this context. Nevertheless, I do appreciate your assurances that conduct of this type will not recur from this point forward.

Have a good evening.

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