

Thomas Caggiano  
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North Las Vegas, NV 89084-3161  
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Email: thomascaggiano@gmail.com  
Mar 30, 2024

**TAKE NOTICE:** *This is a published record on <http://thpmascaggiano.com/FANIWILLIS.pdf>*

*This a certified declaration executed under penalty of perjury based upon my own knowledge, court records, court videos, and my filings FBI tip line submissions, complaints to federal, state, county and municipal government and their enforcement agencies and per will be published by news media Inside on the Outside on thomascaggiano.com which is news media cited by hundreds of urls published by Thomas Caggiano who has provided massive evidence of corruption of all U.S. Attorney Generals in the Obama, Trump and Biden administrations, the State department, corrupt FBI directors, CIGIE, Office of Special Counsel (OSC), GAO FRAud Net, OGIS, Office of Professional Responsibility for DOJ and FBI, OGIS, U.S. District Court District of Columbia Executive Attorney, its Board of Professional Responsibility with the Washington D.C. Bar have protected the FBI and its FBI FOIA officers and othe accomplices as they violate oath of oaffice, Justice Manual, Codes of Ethics as noted in 700 MEGS of evidence distributed in emails and publshied via links on <http://thomascaggiano.com> with sumamry downloadable via <http://thomascaggiano.com.index.pdf>*

*Per FRE R902(6) as per Rule 803. Exceptions to the Rule Against Hearsay*

*[https://www.law.cornell.edu/rules/fre/rule\\_803](https://www.law.cornell.edu/rules/fre/rule_803)the data herein and the adopted referenced exhibits are evidence and NOT hearsay per FRE and may be used by any person in courts or administrative hearings or other purposes and <https://www.ojp.gov/ncjrs/virtual-library/abstracts/fourth-amendment-totality-circumstances-approach-probable-cause> **Fourth Amendment - Totality of the Circumstances Approach to Probable Cause Based on Informant's Tips - Illinois v Gates, 103 s Ct 2317 (1983)**, Journal of Criminal Law and Criminology Volume: 74 Issue: 4 Dated: (Winter 1984) Pages: 1249-1264.. As noted by Gregg Jarret joined by Rep Jim Jordan based upon information from FBI whistle blowers published on on [https://thegreggjarrett.com/the-brief-the-fbi-and-doj-are-running-a-corrupt-protection-racket-for-the-bidens/?utm\\_source=jeeng&utm\\_medium=email](https://thegreggjarrett.com/the-brief-the-fbi-and-doj-are-running-a-corrupt-protection-racket-for-the-bidens/?utm_source=jeeng&utm_medium=email) PODCAST The Brief: The FBI And DOJ Are Running A Corrupt Protection Racket For The Bidens*

State Bar of Georgia Mailed by Priority US MAIL 7019-1640-0000-2543-3612  
office of the General Counsel  
104 Marietta St. NW, Suite 100  
Atlanta, GA 30303

Subject: Ethics Complaint Thomas Caggiano v. Fani Willis, Esq. as County District Attorney violations of Rules of Professional Conduct and other purposes

CF:  
Steven H. Sadow, P.C.  
260 Peachtree Street Northwest  
Suite 2502  
Atlanta, GA 30303

CF:  
Alan Dershowitz  
c/o SkyHorse Publishing  
307 W. 36th St.  
Floor 11  
New York, NY 10018

FBI

Per direction of FBI in Washington D.C. and Nevada regarding federal violations in Fulton County, GA as DA Willis, Esq. stated publicly the prior DA office was corrupt for years as is apparently herself and other accomplices violating 18 USC 2,3,4, et. al.

Protector of federal crimes in Clark County and State of Nevada as documented in FBI tip line reports, U.S. District Court District of Nevada, Docket 2:17-cv-02921-RFB-VCF, the Federal Trade Commission Sentinel Consumer Sentinel Network and Federal Consumer Financial Protection Bureau, Las Vegas, North Las Vegas and Henderson police reports, the corrupt Las Vegas Justice Court 16PO1647 and 17PO1335 as the country's largest community management firm Firstservice Residential is protected by the State of Nevada, DOJ, FBI, CIGIE, and is owned by Firstservice Corporation of Canada protected by Canada's Ministry of Justice, NV Senators Catherine Cortez-Masto (D), Jacky Rosen (D) <http://thomascaggiano.com/ROSEN4.pdf>, Congressman Horsford (D), and NV State Senator Pat Spearman (D), Assemblywoman Daniele Monroe-Moreno (D), series of Clark County Sheriff and District Attorney and all Clark County Commissioners (all Democrats for over a decade), as Nevada is even more corrupt than New Jersey as evidence is published in US District Courts in 9<sup>th</sup> and 3<sup>rd</sup> Circuits and corrupt US District Court District of Columbia's Executive Attorney and its Board of Professional Responsibility along with the Washington D.C. Bar, known to news media to coast to coast, House and Senate oversight committee for years and on [thomascaggiano.com](http://thomascaggiano.com) as well as audio recordings on <http://thomascaggiano.com/CIGIE1.mp3> and [thomascaggiano.com/CIGIE2.mp3](http://thomascaggiano.com/CIGIE2.mp3) exposing pandemic corruption in DC, NV, NJ and US District Courts  
1787 West Lake Mead Boulevard  
Las Vegas, NV 89106-2135

Committee on Oversight and Accountability  
Chairman Comer and corrupt Ranking Member Raskin  
2157 Rayburn House Office Building  
Washington, DC 20515

Georgia State Capitol Senate Special Investigations on Investigations:  
<https://senatepress.net/senate-special-committee-on-investigations-to-hold-first-meeting.html>  
<https://www.wbaltv.com/article/georgia-senate-approves-special-committee-investigation-into-fani-willis/46554105>  
<https://senatepress.net/senate-special-committee-on-investigations-to-hold-first-meeting.html>  
Chair Bill Cowsert and minority members [Bill.Cowsert@senate.ga.gov](mailto:Bill.Cowsert@senate.ga.gov)  
432 State Capitol  
Atlanta, Georgia 30334



# STATE BAR OF GEORGIA

## GRIEVANCE CONFIDENTIAL

thomascaggiano.com  
www.ourtribunal.org

Corruption is exposed on

<http://thomascaggiano.com/>

PLEASE TYPE OR PRINT LEGIBLY IN BLACK INK ONLY  
DO NOT ALTER THIS FORM

YOUR NAME: THOMAS CAGGIANO

MAILING ADDRESS: 7086 ARCADIA GLEN COURT NW 89004  
Street or P.O. Box City State Zip

YOUR EMAIL ADDRESS: thomascaggiano@gmail.com

YOUR PHONE NUMBERS: (CELL) 973-945-0486 (H) (404) 702-586-6768

NAME OF THE ATTORNEY: FANN WILLIS, ESQ.

Fill out a separate form for each attorney. Do not list law firms.

ADDRESS OF THE ATTORNEY: \_\_\_\_\_

DATE OF FIRST CONTACT WITH ATTORNEY: \_\_\_\_\_ DATE OF LAST CONTACT WITH ATTORNEY: \_\_\_\_\_

DOES THIS ATTORNEY CURRENTLY REPRESENT YOU? YES  NO  WAS THIS YOUR ATTORNEY? YES  NO

IS YOUR CASE: CRIMINAL  CIVIL  CASE # \_\_\_\_\_

COUNTY: FULTON OR FEDERAL DISTRICT: NORTHERN  MIDDLE  SOUTHERN

CLEARLY DESCRIBE YOUR COMPLAINT AND ATTACH SUPPORTING DOCUMENTS:

FANN WILLIS HAS VIOLATED THE STATE OF GEORGIA RULES OF PROFESSIONAL CONDUCT AND ENFORCEMENT THEREOF. AS A DISTRICT ATTORNEY SHE IS ALSO HELD TO A HIGH STANDARD AND IS ALSO RESPONSIBLE FOR THE PROFESSIONAL CONDUCT OF THOSE UNDER HER SUPERVISION TO INCLUDE HER PERSONNEL WHO HAVE VIOLATED JUDICIAL WATCH, INC VS FANN WILLIS IN HER OFFICIAL CAPACITY & FULTON COUNTY GA DOCKET 24 CV 002805 ON MAR 5, 2024 CIVIL RIGHTS AND DEFICIENT RESPONSE TO CONGRESSIONAL SUBPOENA & PRIOR REQUEST FOR IMPROPER USE OF A \$488,000 GRANT EARMARKED TO CREATE

If more space is needed, please attach other pages. Please do not write on the back.

Return to: State Bar of Georgia  
Office of the General Counsel  
104 Marietta St. NW, Suite 100  
Atlanta, GA 30303

"I affirm that I have read and understand the information and instructions. The information I have provided here is true to the best of my knowledge."  
SIGNATURE: [Signature]  
DATE: MAR 30, 2024

OPTIONAL: PLEASE PROVIDE THE NAME AND PHONE NUMBER OF SOMEONE WE CAN CONTACT IF WE HAVE DIFFICULTY CONTACTING YOU.

NAME OF CONTACT PERSON: \_\_\_\_\_

PHONE NUMBERS OF CONTACT PERSON: (H) \_\_\_\_\_ (CELL) \_\_\_\_\_

Continued pages Complaint: Thomas Caggiano v. Fani Willis, sq. in her official capacity as District Attorney of the Atlanta Judicial Circuit

as shown on <https://static.fox5atlanta.com/www.fox5atlanta.com/content/uploads/2024/02/Fani-Cover-Letter.pdf> a letter from the House Judiciary Committee letter data Feb 2, 2024 violating her office's due diligence to comply with her duties as District Attorney and as an attorney to assure efforts are made to comply with Congress's official duties and apparently also violating her oath of office, federal and state laws and failure to comply with 18 USC Sections 2, 3,4 and threatening a whistleblower who reported alleged disbursement of federal funds and others that have notified the Georgia Senate Committee authorized to investigate Ms Willis and possible accomplices noted on <https://www.ajc.com/politics/whistleblowers-look-to-speak-with-senate-panel-investigating-fulton-da/KZZ6OBB4FEIFEB2JKUCS3OVME/> and testimony provided before An Athens lawyer and state senator has been tapped to lead a committee that will investigate Fani Willis, the Fulton County district attorney who is prosecuting former president Donald Trump. As shown on <https://flagpole.com/featured/2024/02/01/athens-sen-bill-cowsert-chairs-board-investigating-fani-willis/> The Senate Committee on Assignments named Sen. Bill Cowsert (R-Athens) chairman and Sen. Greg Dolezal (R-Cumming\_ vice chairman of the Special Committee on Investigations that will look into allegations of misconduct against Willis.

"I am honored to be chosen to chair this much-needed committee investigating potential misuse of taxpayer dollars for personal gain and unethical behavior by public officials and paid prosecutors," Cowsert said in a news release.

"There has been a dramatic decrease in public confidence of our criminal justice system. If true, recent allegations related to Fani Willis and Mr. Wade are deeply disturbing. We will independently investigate those claims in a bi-partisan fashion while holding fast to the pursuit of truth. Our charge is not to interfere with ongoing criminal proceedings, to prosecute misconduct or to disqualify any individual prosecutor. Our focus instead will seek to restore public confidence in our criminal justice system." I adopt by reference all public testimony already provided to the Georgia Senate Committee wherein apparent violations are documented by other attorneys and other supportive data submitted by defendants as the Judge was unable to request nor defendants of text messages or cell phone data location reports on Ms Willis nor her alleged accomplice who resigned after Nathan Wade, Esq.

Other relevant public records:

a. <https://abcnews.go.com/US/attorney-leading-effort-disqualify-da-fani-willis-tells/story?id=107856651>

b. <https://www.youtube.com/watch?v=6Nq9egWSUx4>

Fani Willis News LIVE: Ashleigh Merchant Testimony | Georgia Senate Hearing on DA Fani Willis |IN18L

c. <https://www.youtube.com/watch?v=M1yq0acwEAg>

BREAKING NEWS: Trump's Lawyer Ruthlessly Lays Out Case To Disqualify Fani Willis From Georgia Case

JIM JORDAN, Ohio  
CHAIRMAN

JERROLD NADLER, New York  
RANKING MEMBER

ONE HUNDRED EIGHTEENTH CONGRESS

# Congress of the United States

## House of Representatives

COMMITTEE ON THE JUDICIARY

2138 RAYBURN HOUSE OFFICE BUILDING

WASHINGTON, DC 20515-6216

(202) 225-6906  
judiciary.house.gov

February 2, 2024

The Honorable Fani T. Willis  
District Attorney  
Fulton County District Attorney's Office  
141 Pryor Street SW  
Atlanta, GA 30303

Dear Ms. Willis:

<https://static.fox5atlanta.com/www.fox5atlanta.com/content/uploads/2024/02/Fani-Cover-Letter.pdf.pdf>

to The Honorable Fani T. Willis District Attorney Fulton County District Attorney's Office 141 Pryor Street SW Atlanta, GA 30303 Dear Ms. Willis: On August 24, 2023, the Committee on the Judiciary wrote to you requesting documents in the custody of the Fulton County District Attorney's Office (FCDAO) relating, in part, to its receipt and use of federal grant funds issued by the U.S. Department of Justice (DOJ).

- 1 Since that date, we have sent two additional letters, on September 27, 2023,
- 2 and December 5, 2023,
- 3 reiterating our requests.
- 4 To date, you have failed to comply voluntarily with any of our requests.

Ms Willis, Esq. and her office also appears as documented by Judicial Watch, Inc civil action filed in the Clerk of Superior Court, Fulton County, GA 24cv0002805, Mar 5, 2024 7:34 pm has violated Judicial Watch's State of Georgia civil rights noted in Docket 24cv0002805 again violating her oath of office, actions by her subordinates preventing due diligence and continuing to bring destain by the public on her conduct as an officer of the County, District Attorney as judge internationally known as shown on

MAR 05, 2024 07:34 PM

*Chi Alexander Clark*  
Chi Alexander Clark  
Fulton County Superior Court

IN THE SUPERIOR COURT OF FULTON COUNTY

STATE OF GEORGIA

JUDICIAL WATCH, INC., )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 FANI WILLIS, in her official capacity )  
 As District Attorney of the Atlanta )  
 Judicial Circuit, )  
 and )  
 FULTON COUNTY, GEORGIA, )  
 )  
 Defendant. )  
 \_\_\_\_\_ )

CIVIL ACTION FILE NO. \_\_\_\_\_

**COMPLAINT**

Plaintiff Judicial Watch, Inc. brings this action against Defendants Fulton County, Georgia

agaist her and Fulton county, GA has violated Judicial Watch's civil rights violating 18 USC Sections 241 and 242 and under Georgia Open Records Act, 50-18-70 adn as noted on the opinion of Judge noted on <https://www.theguardian.com/us-news/2024/mar/15/fani-willis-ruling-decision-full-pdf>. However, an "odor of mendacity" remains. The Court is not under an obligation to ferret out every instance of potential dishonesty from each witness or defendant. I note Willis's best friend testified under oath of the prior relationship she herself observed between Willis and Nathan Wade, Esq. prior to the date she hired him as Wade did NOT inform his wife of his divorce court filings nor IRS correctly of his proper business expenses apparently possibly committing tax fraud as Willis also was aware Wade used his business law firm's credit card for covering such expenses not legally permitted for as stated unbelievably by Wade his tax account omitted all such expenses he card on his business account including travel on cruise ships with Willis to his law practice. Such compiling of expenses which must be reported to the IRS in federal and state tax returns to be correctly allocated is unlikely and should be investigated by the Federal adn State of Georgia for [possible tax fraud and lying under oath to such enforcement agencies. as Ms Fan Willis, Esqs. would be an accomplice violating 18 USC Section 3 Accomplice after the Fact by personally benefiting from such action. Apparently they both lied to the Court, as they both stated under oath and cell tower data that is used by Ms Willis i court agaist other defendants shows wade went to her home spending overnight at her home as location data on cell phones if available and the content of thousands of text message be-

tween Ms Willis and Wade can be obtained by the Federal, State, and County government executive branch to determine if federal, and state laws were violated within included both criminal and civil contempt of court, perjury, conspiracy and other federal and state crimes in addition to obvious violations of Rules of Professional conduct to include bringing worldwide public disdain against the State of Georgia and Fulton County as shown by hundreds of thousands of people worldwide watching the testimony of before the authorized Georgia Senate Committee shown on youtube with public comments on [https://www.youtube.com/watch?v=jH\\_1w86Ut-w](https://www.youtube.com/watch?v=jH_1w86Ut-w)

As such based upon the above the Ethics committee using subpoena powers in obtaining records, taking depositions, et. al is requested to investigate Ms Fani Willis for violations of the Rules of Professional Responsibility and share information with the FBI and Georgia Attorney General where warranted.

<https://www.gabar.org/barrules/georgia-rules-of-professional-conduct.cfm> for Fani Willis, Esq. with her additional supervisory authority for her staff as I adopt by reference all the testimony in the above cases, facts and references therein by other witnesses.

Part IV - Georgia Rules of Professional Conduct (also includes Disciplinary Proceedings and Advisory Opinion rules)

#### CHAPTER 1 GEORGIA RULES OF PROFESSIONAL CONDUCT AND ENFORCEMENT THEREOF

Rule 4-101. Enforcement of the Georgia Rules of Professional Conduct.

The State Bar of Georgia is hereby authorized to maintain and enforce, as set forth in rules hereinafter stated, Georgia Rules of Professional Conduct to be observed by the members of the State Bar of Georgia

Rule 4-102. Disciplinary Action; Levels of Discipline; Georgia Rules of Professional Conduct.

- a The Georgia Rules of Professional Conduct to be observed by the members of the State Bar of Georgia and those authorized to practice law in Georgia are set forth herein and any violation thereof; any assistance or inducement directed toward another for the purpose of producing a violation thereof; or any violation thereof through the acts of another, shall subject the offender to disciplinary action as hereinafter provided.
- a The levels of discipline are set forth below. The power to administer a more severe level of discipline shall include the power to administer the lesser:
  1. Disbarment: A form of public discipline that removes the respondent from the practice of law in Georgia. This level of discipline would be appropriate in cases of serious misconduct. This level of discipline includes publication as provided by Bar Rule 4-219 (a).

[4] A lawyer should use the law's procedures only for legitimate purposes and not to harass or intimidate others. A lawyer should demonstrate respect for the law, the legal system and for those who serve it, including judges, other lawyers and public officials.

While it is a lawyer's duty, when necessary, to challenge the rectitude of official action, it is also a lawyer's duty to uphold legal process.

## PREAMBLE: A LAWYER'S RESPONSIBILITIES

[1] A lawyer is a representative of clients, an officer of the legal system and a citizen having special responsibility for the quality of justice.

### a. RULE 1.3 DILIGENCE

A lawyer shall act with reasonable diligence and promptness in representing a client. Reasonable diligence as used in this rule means that a lawyer shall not without just cause to the detriment of the client in effect willfully abandon or willfully disregard a legal matter entrusted to the lawyer.

The maximum penalty for a violation of this rule is disbarment.

### b. RULE 1.7 CONFLICT OF INTEREST: GENERAL RULE

### c. RULE 3.4 FAIRNESS TO OPPOSING PARTY AND COUNSEL

### d. RULE 3.6 TRIAL PUBLICITY

a A lawyer who is participating or has participated in the investigation or litigation of a matter shall not make an extra judicial statement that a person would reasonably believe to be disseminated by means of public communication if the lawyer knows or reasonably should know that it will have a substantial likelihood of materially prejudicing an adjudicative proceeding in the matter.

Especially noted is Ms Willis, Esq. public statements at a Black Church widely published worldwide which would influence any jury pool in Fulton county that the defendants were "RACISTS" thus defaming all the defendants and also adversely impacting any jury pool in the State of Georgia.

## RULE 3.8 SPECIAL RESPONSIBILITIES OF A PROSECUTOR

(g) a prosecutor's action and that serve a legitimate law enforcement purpose, refrain from making extra judicial comments that have a substantial likelihood of heightening public condemnation of the accused;

## RULE 4.1 TRUTHFULNESS IN STATEMENTS TO OTHERS

## RULE 5.3. RESPONSIBILITIES REGARDING NONLAWYER ASSISTANTS

As Ms Fani Willis, Esq. is also directly responsible for assuring Congressional requests and Judicial Watch, Inc civil rights under the Georgia Open Records Act have not been violated which by the letter from the House Judiciary Committee and the Fulton Superior court Docket 24CV002805 have been violated to prevent public accessibility.

With respect to a nonlawyer employed or retained by or associated with a lawyer:

a a partner, and a lawyer who individually or together with other lawyers possesses



managerial authority in a law firm, shall make reasonable efforts to ensure that the firm has in effect measures giving reasonable assurance that the person's conduct is compatible with the professional obligations of the lawyer;

- b a lawyer having direct supervisory authority over the nonlawyer shall make reasonable efforts to ensure that the person's conduct is compatible with the professional obligations of the lawyer;

#### Rule 4-103. Multiple Violations

A finding of a third or subsequent disciplinary infraction under these Rules shall, in and of itself, constitute discretionary grounds for suspension or disbarment. A Special Master and the State Disciplinary Review Board may exercise this discretionary power when the question is appropriately before them. Any discipline imposed by another jurisdiction as contemplated by Rule 9.4 may be considered a disciplinary infraction for the purpose of this Rule.

#### Rule 4-201. State Disciplinary Board

1. The powers to investigate and discipline lawyers for violations of the Georgia Rules of Professional Conduct are hereby vested in the State Disciplinary Board.

#### RULE 8.3 REPORTING PROFESSIONAL MISCONDUCT

#### RULE 9.5 LAWYER AS A PUBLIC OFFICIAL

IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

STATE OF GEORGIA

v.

DONALD JOHN TRUMP,  
RUDOLPH WILLIAM LOUIS GIULIANI,  
MARK RANDALL MEADOWS,  
JEFFREY BOSSERT CLARK,  
ROBERT DAVID CHEELEY,  
MICHAEL A. ROMAN,  
DAVID JAMES SHAFER,  
HARRISON WILLIAM PRESCOTT FLOYD, and  
CATHLEEN ALSTON LATHAM.

INDICTMENT NO.  
23SC188947

**ORDER ON DEFENDANTS' MOTIONS TO DISMISS AND  
DISQUALIFY THE FULTON COUNTY DISTRICT ATTORNEY**

On January 8, 2024, Defendant Roman filed a motion to dismiss the indictment and disqualify the Fulton County District Attorney's Office. (Roman Doc. 61). Eight co-defendants later joined and supplemented the motion, raising additional grounds for disqualification.<sup>1</sup> Among other allegations of disqualifying conduct, the Defendants contend that the District Attorney obtained a personal stake in the prosecution of this case by financially benefitting from her romantic relationship with Special Assistant District Attorney ("SADA") Nathan Wade, whom she personally hired to lead the State's prosecution team.

<https://www.theguardian.com/us-news/2024/mar/15/fani-willis-ruling-decision-full-pdf>

Declaration: I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed Mar 20, 2024 signed *Thomas Caggiano*

Publisher and author of Inside on the Outside's thomascaggiano.com and freedomnewsdigest.com exposing corruption in government. See <http://thomascaggiano.com/index.pdf> and use google.com in quotes "thomascaggiano.com" to obtain over 100 other urls referencing thomascaggiano.com as source related evidence against government at all levels and "Deep State" and <http://thomascaggiano.com>