

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

JOHN B. THOMPSON,

Plaintiff,

v.

Case No. 07-21256 (Judge Adalberto Jordan)

THE FLORIDA BAR and  
DAVA J. TUNIS,

Defendants.

**PLAINTIFF'S REQUEST/MOTION  
THAT THE COURT TAKE JUDICIAL NOTICE**

COMES NOW plaintiff, John B. Thompson, hereinafter Thompson, as an attorney on his own behalf, and moves this court to take judicial notice of the following *fact*:

The attached is from a recent article in The Bar's *The Florida Bar News*. The court will note that Bar Governor Steve Chaykin heads up the gang that paranoiacly calls those who oppose gay adoption "enemies of The Bar" and "outside the core values of The Bar." That would be Thompson. Mr. Chaykin is Thompson's designated reviewer in all of the "disciplinary" matters before Referee Tunis, and the court should take judicial notice of that as well.

Finally, note that Bar Governor Chris Lombardo actually states in the attached Bar article that it is proper to use Florida Bar Rule 4-8.4(d) to punish any lawyer who opposes gay adoption *on behalf of a client*. Bar Rule 4-8.4(d) is the primary weapon being used by The Bar against the undersigned, as Greenberg Traurig's Ms. Sharpe correctly told this court at a hearing on August 23, 2007, and Lombardo's endorsement of using this specific ethics Rule to enforce, by discipline, his notions on gay adoption show

how incredibly totalitarian some members of the Board of Governors are willing to be to enforce their gay rights views. It also shows how this particular Bar Rule is facially unconstitutional, as Thompson asserts in his prayer for declaratory relief herein. This is a Rule that The Bar is using against Thompson to punish him, in fact, for truthful speech about corrupt judges and perjuring lawyers.

What a surprise, then, that Norm Kent would be collaborating with The Bar against Thompson in Bar complaints over whose “fairness” presides designated reviewer Steve Chaykin. To oppose corruption is unethical; to oppose gay adoption is unethical. To act upon one’s faith is unethical. To do anything that the Steve Chaykins on The Bar’s Board of Governors finds annoying is unethical. These people are not for liberty; they are the thought police.

Plaintiff asks, not rhetorically, how any Article III judge, upon being provided with these facts of which it must take judicial notice, could not possibly see what is going on here, by The Bar, to shred the Constitution at the behest of ideological, thuggish zealots at The Bar.

I HEREBY CERTIFY that this has been served upon record counsel this 22<sup>nd</sup> day of October, 2007, electronically.

/s/ JOHN B. THOMPSON, Plaintiff  
Attorney, Florida Bar #231665  
1172 South Dixie Hwy., Suite 111  
Coral Gables, Florida 33146  
Phone: 305-666-4366  
[amendmentone@comcast.net](mailto:amendmentone@comcast.net)