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December 2, 2019

Teresa Goodson, Esquire
Bar Counsel
Attorney Consumer Assistance Program
651 Jefferson Street
Tallahassee, Florida 32399-2300

Re: Response to complaint by Michael D. Huckabee against Daniel Will Uhlfelder
The Florida Bar File No. 2019-00, 223 (1b)

Dear Ms. Goodson:

Pursuant to Rule 4-8.4(g), Rules of Professional Conduct of the Rules Regulating the Florida Bar, this letter serves as a response to the above-referenced complaint (hereinafter referred to as the "complaint") filed by Michael D. Huckabee (hereinafter referred to as "Mr. Huckabee"). At no time has Mr. Huckabee or any other individual or attorney requested any of the publications he complains of be removed. The Florida Bar should know this complaint is yet another attempt by certain individuals who own property in Walton County, Florida to attack any individual who voices support of customary use in a strategic effort to chill support for customary use of Walton County, Florida's beaches and individuals' first amendment rights.

**THE CONDUCT COMPLAINED OF IS PROTECTED BY THE FIRST AMENDMENT
OF THE UNITED STATES CONSTITUTION**

A lawyer--simply because he or she is a lawyer--does not check First Amendment rights at the door to admission to The Florida Bar. See, e.g., *Gibson v. The Florida Bar*, 798 F.2d 1564 (11th Cir. 1986); *Lathrop v. Donohue*, 367 U.S. 820 (1961). This is particularly the case, when the lawyer is engaged in purely private conduct, unconnected with the practice of law. At the heart of the First Amendment is the recognition that the "freedom to speak one's mind is not only an aspect of individual liberty--and thus a good unto itself--but also is essential to the common quest for truth and the vitality of society as a whole." *Bose Corp. v. Consumers Union of United States, Inc.* 466 U.S. 485, 503-504, (1984). Rhetorical hyperbole, verbal abuse, name calling, ridicule, jest, satirical statements and parody are all acceptable forms of protected forms of First Amendment expression by a private citizen, acting in a private capacity, even one who is professionally licensed

as a lawyer. As the United States Supreme Court has noted in the First Amendment context, protected speech in various public disputes very often takes the form of "rhetorical hyperbole" used to convey a "vigorous epithet" by a protestor who considers his adversary's position "extremely unreasonable." *Milkovich v. Lorain Journal Co.*, 497 U.S. 1 (1990). This is particularly the case when the subject of the criticism is said to have "placed himself" in the "controversy or combat," because, in such circumstances, the emergence of rhetorical hyperbole is most likely. See, *Ollman v. Evan*, 750 F.2d 970, 1002 (D.C.Cir. 1984)(concurring opinion of Judge Bork).

**THIS COMPLAINT IS ANOTHER PROCEDURAL WEAPON BY
POWERFUL AND INFLUENTIAL OPPONENTS OF CUSTOMARY USE
TO SUBVERT THE PURPOSE OF FLORIDA BAR RULES AND CHILL
MR. UHLFELDER'S FIRST AMENDMENT RIGHT TO SPEAK ON A
MATTER OF GREAT PUBLIC CONCERN TO HIS AREA**

The filing of this complaint is subversive to the Bar's own Rules. Chapter 4. Rules of Professional Conduct, Preamble provides: A Lawyer's Responsibilities provides in relevant part that "the purpose of the rules can be subverted when they are invoked by opposing parties as procedural weapons." Mr. Huckabee has filed this complaint as a "procedural weapon" as part of his continued and relentless attack on Mr. Uhlfelder and anyone else who opposes Mr. Huckabee's views on customary use. The fact the complaint was filed through his attorney, Nixon Daniel, confirms this assertion.

In 2006, The Florida Bar's Special Commission on Lawyer Regulation issued a report and recommendation which addressed complaints prompted by civil litigants against lawyers, in their private capacity. *Special Commission on Lawyer Regulation Report and Recommendation, 2006*. The goals of the Commission were to increase the speed with which matters are evaluated and the fairness of the lawyer discipline system. The Commission condemned the sort of complaint brought in this case:

The Commission recognizes that some adversaries and individuals not in privity with a lawyer file complaints concerning the lawyers conduct with the intent to gain an advantage in the dispute. Using the disciplinary process in such a manner is *clearly improper* and *repugnant* to the concept of fairness. *Special Commission on Lawyer Regulation Report and Recommendation, 2006, p. 11.* (Emphasis added).

The Preamble to The Rules Regulating the Florida Bar further warns against permitting the misuse of the disciplinary proceedings for private gain:

The rules are designed to provide guidance to lawyers and to provide a structure for regulating conduct through disciplinary agencies. They are not designed to be a basis for civil liability. Furthermore, the purpose of the rules can be subverted when they are invoked by opposing parties as procedural weapons. Preamble, Rules Regulating the Florida Bar.

In *The Florida Bar v. Nesmith*, 642 So.2d 1357, 1358 (Fla. 1994), the Florida Supreme Court determined a civil dispute unrelated to the practice of law "best resolved by the courts and not through a disciplinary proceeding." In *Moakley v. Smallwood*, 826 So.2d 221 (Fla. 2002), the Florida Supreme Court affirmed that, even in cases involving attorney conduct, trial courts are often in the best position to strike an "appropriate balance" between "condemning as unprofessional or unethical litigation tactics undertaken solely for bad faith purposes, while ensuring that attorneys will not be deterred from pursuing lawful claims, issues, or defenses on behalf of their clients or from their obligation as an advocate to zealously assert the clients' interest."

This grievance was initiated by the complainant as a procedural weapon in a civil suit to add pressure to an attorney to cease further representation in the suit and/or for purported reputational damages, private grievances and/or personal vendettas. The Florida Supreme Court has previously cautioned the Bar for allowing the grievance process to become a substitute for civil proceedings and civil remedies. *The Florida Bar v. Cook*, 567 So.2d 1379 (Fla. 1990). Disciplinary proceedings are not designed to redress private grievances. *The Florida Bar v. Della-Donna*, 583 So.2d 307 (Fla. 1989).

Mr. Uhlfelder is counsel for Florida Beaches For All, Inc. (hereinafter referred to as "FBFA") in the civil action pending in Walton County, Florida Circuit Court styled *In re: Affirming Existence of Recreational Customary Use on 1,194 Private Properties Located In Walton County, Florida, Case No.: 2018 CA 000547* (hereinafter "Walton CU Case"). FBFA is a non-profit 501(c)(4) entity founded by a group of concerned citizens regarding the use of the dry sandy beaches in Walton County, Florida. It seeks the peaceful restoration of customary use on Walton County's beaches, communicates and educates the beach going public on any and all issues and incidences related to customary use of Walton County's beaches, and advocates for equal use of Walton County's beaches.¹ It became a party the Walton CU case when the Court granted its Motion to Intervene on April 17, 2019.

FBFA's motion to intervene was granted by the Court over strenuous opposition of the team of lawyers and hundreds of gulf front Walton County property owners, including Mr. Huckabee, who argued in part that FBFA's intervention would likely cause disruption and delay of the proceedings to the Defendants' disadvantage because of Mr. Uhlfelder's involvement in the case. They falsely accused Mr. Uhlfelder of "doxing" one of the parties in the case and asking

¹ <https://www.floridabeachesforall.org/mission>

others to harass one of the opposing attorneys. The Judge heard these arguments and others and still granted FBFA's Motion to Intervene. Unsatisfied with the ruling, certain gulf front property owners, including Mr. Huckabee, decided to take this action to try and chill FBFA's representation as a strategic and tactical ploy.

The Walton CU Case centers around the highly contentious issue of whether the public has the right to customarily use beaches that may be privately owned. The epicenter of this dispute is South Walton County, Florida. The division between customary use supporters and private property supporters has only intensified since the filing of the Walton CU Case in December 2018. The issue has caused a significant divide among residents and is of great public concern not only to the residents and visitors to the beaches of Walton County, but to the entire State of Florida.

Mr. Huckabee's complaint against Mr. Uhlfelder is a continued part of his and others strategy to chill any opposition and make sure their efforts to restrict use and access to our beaches are successful by any means necessary. In fact, his supporters have so consistently attacked and harassed Mr. Uhlfelder that he blocked many of them from access to all his social media accounts. Mr. Uhlfelder has never personally met many of these individuals including Mr. Huckabee, so it is particularly disturbing that they exhibit so much public hatred and disdain for him in their publications.

Mr. Huckabee has attacked Mr. Uhlfelder on his network show Huckabee on Trinity Broadcasting Network ("TBN").² According to TBN's website, "TBN Is the world's largest Christian television network and America's most-watched faith-and-family channel . . . TBN's family of networks is available to 98 percent of television households, and globally TBN reaches an estimated two billion potential viewers each day!" According to TBN's website, Mr. Huckabee's show airs weekly on Saturday and Sunday evenings.³

On October 13, 2018, Mr. Huckabee said the following about Mr. Uhlfelder which was published on TBN and throughout social media amongst Mr. Huckabee's millions of followers:

Of course there were a few jerks like some ambulance chasing activist lawyer whose hateful tweet caused me to block him because I think if a person can't let go of his political hate during a hurricane, he doesn't need to follow me on Twitter he needs to follow Jesus; that's what he needs to do.

² <https://www.facebook.com/HuckabeeOnTBN/videos/1616748931762641/>. The showing had 61,000 view on its Facebook site for this publication and 92,000 viewers on its Facebook page. It is also on his YouTube page which was viewed 5,040 times.

<https://www.youtube.com/watch?v=4CN3RAR0uqM&list=PLp0lqOAbW0sYWhJesY5CM2n0YVPzCsw9P>

³ <https://www.tbn.org/huckabee>

Mr. Huckabee was recently ranked No. 1 on Top TV Personalities for his Social Media Rankings.⁴ His allegation of ambulance chasing supports the view that Huckabee's statement about Mr. Uhlfelder as an ambulance chasing lawyer is a false and defamatory statement. *See also Flamm v. American Assn of University Women*, 201 F. 3d 144, 147 (2nd Cir. 2000) ("the description of Flamm as an "ambulance chaser" might imply that Flamm engages in the unethical solicitation of clients"). Furthermore, it is well known that Mr. Uhlfelder is Jewish whose ancestors were killed in the Holocaust and to suggest he needs to follow Jesus rather than Mr. Huckabee on Twitter is offensive to say the least.⁵

RULE 4-8.4(D) OF THE RULES REGULATING THE FLORIDA HAS NO APPLICATION TO THIS COMPLAINT BECAUSE THE COMPLAINED OF CONDUCT WAS NOT IN CONNECTION WITH THE PRACTICE OF LAW THAT IS PREJUDICIAL TO THE ADMINISTRATION OF JUSTICE.

The only rule Mr. Huckabee references has no application to Mr. Uhlfelder's conduct for several reasons. Florida Rule 4-8.4(d) provides that 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.

The comments to the rule provide the following:

Subdivision (d) of this rule proscribes conduct that is prejudicial to the administration of justice. Such proscription includes the prohibition against discriminatory conduct committed by a lawyer while performing duties in connection with the practice of law. The proscription extends to any characteristic or status that is not relevant to the proof of any legal or factual issue in dispute. Such conduct, when directed towards litigants, jurors, witnesses, court personnel, or other lawyers, whether based on race, ethnicity, gender, religion, national origin, disability, marital status, sexual orientation, age, socioeconomic status, employment, physical characteristic, or any other basis, subverts the administration of justice and undermines the public's confidence In our system of justice, as well as notions of equality.

⁴<https://www.hollywoodreporter.com/lists/mike-huckabee-spends-first-week-at-no-1-top-tv-personalities-social-media-ranking-1104397/item/bill-maher-mvp-personalities-4-25-1104434>

⁵ Mr. Huckabee has been previously criticized by the Antidefamation League (ADL) for suggesting that President Obama was "leading Israel to the door of the oven" in the nuclear agreement with Iran. <https://www.adl.org/news/press-releases/adl-sharply-criticizes-huckabee-comment-suggesting-obama-is-leading-israel-to>

As explained in more detail below, none of Mr. Uhlfelder's conduct Mr. Huckabee complains of was performed in connection with the practice of law or while he was performing any duties in connection with the practice of law and does not violate any standards or rules regulating The Florida Bar. The only Ethics Opinion interpreting the Rule found that Rule 4-8.4(d) provides that an attorney shall not "engage in conduct that is prejudicial to the administration of justice" and this rule would prohibit an attorney from using, attempting to use, or threatening to use the criminal justice system solely to gain an advantage in a civil matter. The criminal process was not intended to be used as a means of settling private disputes and is undermined when it is misused in such a manner. Fl. Ethic. Op. 89-3 (Florida Bar Association), 1989 WL 380141. Rule 4-8.4(d) specifically requires that any misconduct be in connection with the practice of law. The express language of Rule 4-8.4(d) "applies only when a lawyer engages in misconduct while employed in a legal capacity."

Rule 4-8.4(d), Rules Regulating the Florida Bar expressly provides that a lawyer shall not engage in conduct in connection with the practice of law that is prejudicial to the administration of justice. This emphasized language was amended by the Florida Supreme Court in 1994 in recognition of the principle that Rule 4-8.4(d) "must be limited in its application to situations involving the practice of law." *In re: Amendments to Rules Regulating the Florida Bar*, 624 So.2d 720 (Fla. 1993). The Florida Bar confirmed that "the proposed amendment must be limited in its application to situations involving the practice of law in order to ensure that the First Amendment rights of lawyers are not unduly burdened." *Id.* at 721. Consistent with this amendatory language, the Florida Supreme Court has subsequently refused to extend the reach of Rule 4-8.4(d) to all lawyer conduct, specifically holding that the Rule applies "only when a lawyer engages in misconduct while employed in a legal capacity." *The Florida Bar v. Brake*, 767 So.2d 1163, 1168 (Fla. 2000).

RESPONSE TO FACTS/ALLEGATIONS

Contrary to Mr. Huckabee's complaint, Mr. Uhlfelder has not used social media to harass Mr. Huckabee by repeatedly posting disparaging information about him during an ongoing quiet title/customary use litigation in which he represents an adverse party. He has not posted disparaging information about him and does not represent an adverse party in any ongoing quiet title matter. There is no such ongoing quiet title matter for which he represents anyone. Mr. Uhlfelder did not accuse Mr. Huckabee of being a thief. On July 6, 2019, Mr. Huckabee's Humor Strategist and Joke Coach, Chip Hinkle man,⁶ posted a tweet as follows:

In the process of petitioning the WH to give Mike Huckabee his own Secret Service code name (since he's so vital to America). To expedite the process I'm opening

⁶ <https://twitter.com/chiphinkleman?lang=en>. Mr. Hinkle man's Twitter page is riddled with jokes regarding Mr. Huckabee lauding his sense of humor.

It up to suggestions. What should Huck's code name be? Keep 'em short, fun & evocative (like PREACHER or CRAWDAD).

In response, Mr. Uhlfelder jokingly suggested "Beach Thief."

Mr. Huckabee mischaracterizes this tongue-in-cheek response to his humor strategist throughout his complaint. This response to a request for a short, fun and evocative question had nothing has nothing to do with Mr. Huckabee's separate quiet title actions. Contrary to Mr. Huckabee's complaint, Mr. Uhlfelder did not thrust him into the spotlight of this litigation in a negative manner reflecting poorly upon members of the Florida Bar. Mr. Huckabee thrust himself into the spotlight of this dispute by his own conduct which has been widely reported in local, state and national publications.⁷

A May 22, 2019 Mother Jones article⁸ detailed his involvement in this subject and Mr. Huckabee complains that Mr. Uhlfelder retweeted this article. The article provides some of his history in the controversy and seems to be the source of much of Mr. Huckabee's anger.

Mr. Uhlfelder's Twitter account was apparently a public account which he was unaware of until receiving Mr. Huckabee's complaint. It was his understanding that only his followers could access his Twitter account. Now that Mr. Uhlfelder knows that is not the case, he has adjusted it to be only accessible to his followers, which total approximately 400.

Although Mr. Uhlfelder's Twitter account mentions he is an attorney, he is the sole owner of his law firm and this is his only Twitter page so is not part of his legal practice. It is used to communicate with his followers and has no connection with Mr. Uhlfelder's practice of law. His Twitter presence clearly can be divorced from his legal practice contrary to Mr. Huckabee's assertion. Mr. Uhlfelder typically uses it to follow current and political events, friends and personal interests as evidenced by who he follows (e.g., sports personalities, politicians, media personalities, universities he attended). He does not use this Twitter account as part of his law practice. It is not used to communicate with opposing attorneys, the Court or litigants. It is simply a personal Twitter page he uses as allowed for by his First Amendment constitutional rights and to keep up with the local and national news and personal interests.

⁷ <https://www.tampabay.com/florida-politics/buzz/2018/09/10/mike-huckabees-role-in-pushing-for-controversial-beach-access-law/>; <https://www.pnj.com/story/opinion/2018/09/15/elitist-mike-huckabee-steals-public-beach-floridians-marlette/1289598002/>; <https://www.nwfdailynews.com/news/20180911/mike-huckabee-responds-to-his-connection-to-hb-631>; <https://www.npr.org/2018/09/10/634666036/private-beaches-in-florida-spark-battle-with-residents-and-county>; <https://www.floridaphoenix.com/2018/09/17/citizens-rising-up-against-the-florida-legislature-gov-rick-scott-and-private-property-zealots/>

⁸ <https://www.motherjones.com/politics/2019/05/mike-huckabees-epic-fight-to-keep-beachgoers-off-his-patch-of-florida-sand/>

THE SUBJECT POSTINGS ARE NOT SUBJECT TO DISCIPLINE.

The May 25, 2019 retweet is not a violation of Florida Rule 4-8.4(d) because it was not in connection with the practice of law, it was not prejudicial to the administration of justice and was not posted intentionally or through callous indifference to disparage Mr. Huckabee. In response to the Mother Jones article referenced above, a Twitter user posted an unflattering portrait of Mr. Huckabee to which Mr. Uhlfelder replied “[p]lease let me forget this tweet. Please let me forget this tweet.” When another user made a comment about Mr. Huckabee’s daughter, who is not a party to any litigation, Mr. Uhlfelder wrote “[y]ou’ve gone too far. Please stop before you break twitter.”

The October 10, 2018 tweet is not a violation of Florida Rule 4-8.4(d) because it was not in connection with the practice of law, it was not prejudicial to the administration of justice and was not posted intentionally or through callous indifference to disparage Mr. Huckabee. In fact, the subject litigation had not even been filed yet.

The May 25, 2019 tweet referencing Mr. Huckabee’s anniversary is not a violation of Florida Rule 4-8.4(d) because it was not in connection with the practice of law, it was not prejudicial to the administration of justice and was not posted intentionally or through callous indifference to disparage Mr. Huckabee. In fact, the tweet and all others were blocked starting around October 10, 2018 so Mr. Uhlfelder was unaware Mr. Huckabee saw these tweets.

Regarding Mr. Uhlfelder’s response to former Congresswoman Gwen Graham’s September 30, 2019 tweet, he attached a link to a site by Sachs Media Group and its efforts to stop nourishment of Walton County’s beaches because Ms. Graham’s friend mentioned in her tweet who was involved in her removal from Rebuild 850 was Ron Sachs. Mr. Uhlfelder is a longtime friend and supporter of Gwen Graham and her family and was expressing his consolation for her treatment by Mr. Sachs who was also involved in stopping nourishment of Walton County’s beaches for his client Mr. Huckabee. The failure of Walton County to nourish its beaches was a strategic move to also stop customary use.

The July 6, 2019 tweet was addressed earlier.

The September 18, 2018 retweet of an article by Andy Marlette of the *Pensacola News Journal* is not a violation of Florida Rule 4-8.4(d) because it was not in connection with the practice of law, it was not prejudicial to the administration of justice and was not posted intentionally or through callous indifference to disparage Mr. Huckabee. In fact, the subject litigation had not even been filed yet.

The October 15, 2018, October 16, 2018, October 24, 2018, October 28, 2018, March, 2019 tweets, and April, 2019 tweets and retweets are not violations of Florida Rule 4-8.4(d)

because they were not in connection with the practice of law, they were not prejudicial to the administration of justice and were not posted intentionally or through callous indifference to disparage Mr. Huckabee. In fact, the subject litigation had not even been filed yet and/or FBFA had not intervened yet.

The April 21, 2019 and May 22, 2019 retweets were simply retweets of the Mother Jones article and responses to the article and comments by others about the situation. The remaining tweets and retweets are not violative of Florida Rule 4-8.4(d) because they were not in connection with the practice of law, they were not prejudicial to the administration of justice and were not posted intentionally or through callous indifference to disparage Mr. Huckabee.

The cases cited by Mr. Huckabee have no application and support Mr. Uhlfelder's position that this complaint is meritless. Those cases dealt with repeated conduct in connection with the practice of law such as communications with opposing counsel, conduct in court hearings, conduct inside the courthouse, in chambers and courthouse hallways and representations to the Bar that the opposing party had some kind of mental disorder and was a liar causing prejudice to the administration of justice.

In fact, every single case interpreting this Rule dealt with a situation where it was clear the conduct was part of the practice of law which was prejudicial to the administration of justice without dispute. *Florida Bar v. Patterson*, 257 So.3d 56, 64 (Fla. 2018)(attorney made disparaging statements in court filings and in letters to other members of judiciary about opposing counsel and presiding judge for his own interest hindering the client's appellate rights and imposition of sanctions against his client); *The Florida Bar v. Petersen*, 248 So.3d 1069, 1080 (conduct involved failure to act competently and diligently in litigation resulting in dismissal of case, misstatements of fact to the court, and adversarial conduct resulted in additional litigation which was prejudicial to administration of justice). The conduct complained of by Mr. Huckabee was not in connection with the practice of law and has had no impact on the administration of justice. Mr. Huckabee has not cited any evidence that the complained of conduct affects or prejudices the administration of justice or any potential or actual injury caused by the conduct that is prejudicial to the administration of justice because no such potential or actual injury exists. If Mr. Huckabee believes as a well-known public figure, he has suffered damages, he may seek relief in court to redress those damages. Mr. Huckabee's pending litigation along with the hundreds of others who support his position is being actively litigated and with no prejudice whatsoever to his case due to the complained of conduct. Mr. Huckabee cites to only two witnesses in his complaint – him and Mr. Uhlfelder. He has not cited to any injury he has suffered from the publication of the subject tweets which would show he suffered injury, or the administration of justice has been affected.

Mr. Huckabee is a well-known public figure who has engaged in rigorous debate on several topics and in the course of such conduct made offensive and disparaging comments about several

groups including members of the LGBTQ community,⁹ the Jewish community and others. He suggests that Mr. Uhlfelder's conduct reached its peak when he accused him of theft, a crime of moral turpitude. However, the so-called theft tweet he complains of was tweeted on July 6, 2019 and neither Mr. Huckabee nor his attorneys have ever requested the tweet be removed.

Although Mr. Huckabee goes to great lengths to attach numerous tweets and retweets, he conveniently fails to mention the tweets and retweets Mr. Uhlfelder published in the days leading up to when he actually signed the bar complaint, which appears to be what really motivated him to file his retaliatory complaint and use his Bar complaint as a retaliatory mechanism for what he perceives as public criticism. More specifically, on October 10, 2019, October 11, 2019, October 12, 2019, Mr. Uhlfelder retweeted tweets posted by Chip Hinkleman and Jacob Kornbluh of the Jewish Insider, of Mr. Huckabee photographed with Lev Parnas and Igor Fruman in Israel and other locations. On October 11, 2019, Mr. Uhlfelder tweeted articles detailing a dinner where Mr. Huckabee was present and Mr. Parnas was honored.¹⁰ On October 9, 2019, Igor Fruman and Lev Parnas were arrested at Dulles International Airport and charged with planning to direct funds from a foreign government to U.S. Politicians while trying to influence U.S. – Ukraine relations¹¹ on campaign finance charges on their way to travel to Austria. Therefore, contrary to Mr. Huckabee's suggestion that his complained of conduct reached its peak when Mr. Uhlfelder accused him of theft by suggesting his White House Secret Service code name be "Beach Thief," the conduct which in all likelihood prompted him to file this frivolous bar complaint was Mr. Uhlfelder's postings of him with Lev Parnas and Igor Fruman.

With regard to any posts, acts or comments Mr. Uhlfelder has made of which Mr. Huckabee complains, he did so to share or regarding a topic that is of great public concern to all residents in the State of Florida and alert Mr. Uhlfelder's friends, family and contacts of information of which they had a significant interest. He just wanted to share incidents of great public concern with the beach going public and residents and non-residents that customarily use the beaches of South Walton County as a private citizen. If Mr. Huckabee, a public figure, really wants to complain about this name calling, as he states, he has a civil remedy for libel or slander and should pursue that as opposed to having pressure applied by the Florida Bar. If you have any further questions or need additional information do not hesitate to contact me.

⁹ <https://www.christianpost.com/news/mike-huckabee-identifies-biggest-threat-to-moral-fiber-of-us-why-its-the-churchs-fault-exclusive.html>


¹⁰ <http://www.thejewishstar.com/stories/young-israels-celebrate-for-the-love-of-trump.16799>

¹¹ <https://www.justice.gov/usao-sdny/pr/lev-parnas-and-igor-fruman-charged-conspiring-violate-straw-and-foreign-donor-bans>

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December 2, 2019
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This matter should be closed without additional action.

Very truly yours,



Mark S. Levine

MSL:sb

cc: Daniel W. Uhlfelder
Nixon Daniel