



NEW YORK STATE SENATOR

Brad Hoylman-Sigal

Attorney Grievance Complaint: Emil Bove

SENATOR BRAD HOYLMAN-SIGAL February 22, 2025

February 21, 2025

Re: Emil Joseph Bove III (Registration # 4700696)

Dear Distinguished Members of the Attorney Grievance Committee:

As the Chair of the New York State Senate Judiciary Committee and an attorney duly admitted in good standing to practice law in the State of New York, I am submitting for your consideration the following complaint regarding Emil Joseph Bove III's conduct with respect to *United States v. Eric Adams*, 24 Cr. 556 (DEH).

Specifically, I am deeply concerned by Mr. Bove's reported facilitation of a *quid pro quo* to facilitate a dismissal of the indictment against New York City Mayor Eric Adams – without any cognizable legal basis – in exchange for Mayor Adams' cooperation with the Trump Administration's efforts to detain and deport migrants. Mr. Bove's abuse of legal process for political ends is facially "conduct [] prejudicial to the administration of justice" and thus runs squarely afoul of the Rules of Professional Conduct which you are entrusted to enforce.

By way of further background, and as I am sure you are aware, Mr. Bove is Acting Deputy Attorney General of the United States and a former personal defense attorney to President Donald Trump. In September 2024, Mayor Adams was charged with a five-count indictment

alleging bribery, campaign finance, and conspiracy offenses. The indictment was supported by fact and law and returned by a duly constituted grand jury. In the succeeding four months, the case against Mayor Adams proceeded ordinarily, until the Trump Administration took power, and Mayor Adams began lobbying aggressively for favorable treatment.

On February 10, 2025, Mr. Bove issued a memorandum directing then-acting United States Attorney for the Southern District of New York Danielle Sassoon to dismiss the five-count indictment against Mayor Adams without prejudice. In the memorandum, Mr. Bove failed to identify any legal or evidentiary issues which would call the indictment into question. Nor did he cite a single issue with case proceedings or the conduct of the non-partisan team of prosecutors who litigated the case. In fact, Mr. Bove expressly admitted that he “reached th[e] conclusion [to dismiss the indictment] without assessing the strength of the evidence or the legal theories on which this case is based[.]” Instead, Mr. Bove’s directive expressly rested on unsupported political argumentation – namely, that the indictment hindered Mayor Adams’ ability to assist with the Trump Administration’s deportation efforts and that the former United States Attorney for the Southern District of New York allegedly had political aspirations.

Rather than cower to Mr. Bove’s abuse of his authority (and bar membership) to derail the administration of justice as to Mayor Adams, Ms. Sassoon resigned. Her courageous letter, which can be found [here](#), lays bare the ways in which Mr. Bove contravened the rule of law. Ms. Sassoon notably concluded that she could not uphold her duty as an attorney while also dismissing the indictment because the dismissal would be “inconsistent with [her] ability and duty to prosecute federal crimes without fear or favor and to advance good-faith arguments before the courts.” Ms. Sassoon’s resignation was shortly followed by that of another federal prosecutor who led the case team, Hagan Scotten. Mr. Scotten’s letter, which can be found

[here](#), is likewise compelling. He wrote that “our laws and traditions do not allow using the prosecutorial power to influence other citizens, much less elected officials[.]”

Mr. Bove’s unprecedented directive to dismiss charges against Mayor Adams solely so that the Trump Administration could influence Mayor Adams’ cooperation with their migrant deportation efforts very likely constitutes attorney misconduct in violation of Rule 8.4 of the Rules of Professional Conduct, which provides that an attorney shall not (in relevant part “engage in conduct that is prejudicial to the administration of justice,” “engage in conduct involving dishonesty, fraud, deceit or misrepresentation,” and “engage in any other conduct that adversely reflects on the lawyer’s fitness as a lawyer.”

I again urge this Committee to review Mr. Bove’s conduct leading up to the likely dismissal of the indictment. In no uncertain terms, Mr. Bove ensured that justice against Mayor Adams would not be administered, for no other reason than so the Trump Administration could detain and deport migrants in New York City. It is hard to underscore the gravity of Mr. Bove’s actions, and the implications for the administration of justice in New York if he does not face consequences. Accordingly, the Committee should give serious consideration to all available sanctions, up to and including a recommendation that Mr. Bove be stripped of his license to practice law.

Thank you for your consideration of my request.

Sincerely,

Brad Hoylman-Sigal

Chair, New York Senate Judiciary Committee