FLOREKLAW LLC

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June 5, 2026

**Via US Mail and E-Mail**

[redacted]

**Re: Notice of Litigation Hold And Preservation Of Evidence**
**Judiciocracy, LLC and its agents**

[redacted]

My name is Adam Florek and, along with my firm and its Chief Legal Counsel, Edward "Coach" Weinhaus, we represent Judiciocracy, LLC and its affected agents. Judiciocracy LLC is a Missouri-based limited liability company in the legal news space, monitoring the legal system in various areas such as Attorney Misconduct, Judicial Misconduct, Bar Passage, and more. We are writing on their behalf. Please let this Notice of Litigation Hold and Preservation of Evidence Letter ("Letter") serve as a formal litigation-hold notice to you and to all affiliated individuals, officers, directors, employees, agents, and third parties acting on your behalf. Please treat this matter as if a lawsuit has already been filed and litigation is ongoing.

This letter is in anticipation of legal action by Judiciocracy and potentially, several of its staffers, against certain individuals with whom you are in direct communication with for, *inter alia*, trade libel, defamation, and tortious interference with prospective business relationships. You are also a potential litigant and should treat this as notice of same. The claims arise from but are not limited to false and disparaging statements about my clients, their publications, their actions in creating those publications, and their relationship with their customers and audience as well as your communications, actions, support of and involvement with procuring statements intended to damage their professional relationships or economic interests.

Accordingly, you are legally obligated to, effective immediately, preserve, protect, and refrain from destroying, altering, concealing, transferring, or otherwise disposing of any and all documents, electronically stored information ("ESI"), materials, records, communications, and tangible things — in whatever form they exist — that are described in this Letter, the attached Schedule of Materials, and/or are reasonably likely to bear on the claims and defenses at issue. This obligation applies retroactively to all materials currently in your possession, custody, or control, and continues until further written notice.

Failure to comply with this litigation hold shall result in severe legal consequences, including spoliation sanctions, adverse inference instructions, monetary sanctions, and other remedies available under applicable state and federal rules.

Your preservation obligation extends to all materials currently in your possession, custody, or control, including materials held by agents, employees, contractors, attorneys, *except those protected by applicable privilege, which must be identified in a privilege log*, or any other third party acting on your behalf.

You must immediately:

a. Suspend all routine document destruction policies and any automated deletion or overwriting processes, including email auto-deletion, cloud storage deletion schedules, and any similar automated processes;

b. Issue a litigation hold notice to any individual or entity under your direction or control who may possess documents within the scope of this Notice;

c. Take affirmative steps to identify and collect all relevant documents and ESI from all applicable sources, systems, and devices;

d. Preserve all backup tapes, archived records, and legacy data that may contain information within the scope of this Notice; and

e. Document your preservation efforts in writing, as you may be required to demonstrate the adequacy of your compliance at a later date.

In the event that you fail to comply, courts have broad authority to impose sanctions for the failure to preserve evidence once a litigation hold obligation has attached. Sanctions for spoliation, *the destruction, loss, alteration, or failure to preserve relevant evidence*, include but are not limited to:

a. Adverse inference instructions directing the finder of fact to presume that destroyed evidence would have been unfavorable to the spoliating party;
b. Monetary sanctions, including the award of fees and costs;
c. Issue preclusion or striking of claims or defenses;
d. Contempt of court, and/or
e. Adverse judgment and/or dismissal.

The litigation hold obligation arises when, as here, litigation is reasonably anticipated, which occurred no later than the date of this letter. Your failure to immediately implement and maintain this hold will be treated as willful spoliation and will be brought to the attention of the court accordingly.

Please confirm, in writing, within five (5) business days of receipt of this Letter that you have received and understood this Notice of Litigation Hold And Preservation Of Evidence, that you have implemented an immediate litigation hold, and that you have taken affirmative steps to preserve all materials within the scope of this Letter.

This Letter does not constitute a waiver of any rights or defenses available to Judiciocracy, LLC or those acting on its behalf, nor does it preclude them from seeking additional relief or discovery as may be appropriate under applicable law.

If you have any questions regarding the scope of this litigation-hold, please feel free to contact Mr. Florek. Do not hesitate to contact your own legal counsel at any time.

Please govern yourself accordingly,



Adam Florek

/s/*Edward "Coach" Weinhaus*

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*This communication is sent on behalf of a represented party in anticipation of litigation. It constitutes a legal demand and should be forwarded immediately to any attorney representing you. If you are currently unrepresented, you are strongly encouraged to retain legal counsel promptly.*

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## Schedule of Materials

Materials subject to the Notice of Litigation Hold And Preservation Of Evidence Letter include but are not limited to: any and all documents, communications, records, data, and electronically stored information relating to, referencing, originating from, or exchanged with any of the following individuals and entities:

1. [redacted]
2. [redacted]
3. Jansen Fluegel;
4. [redacted]
5. [redacted]
6. [redacted]
7. [redacted]
8. [redacted]
9. [redacted]
10. The State Bar of California, including any communications sent to or received from that body, any filings, complaints, submissions, or responses, and any documents referencing proceedings before that body;
11. The California Office of the Chief Trial Counsel, including any communications, complaints, submissions, filings, or correspondence of any kind;
12. The Illinois Attorney Registration and Disciplinary Commission ("ARDC"), including any communications sent to or received from that body, any filings, complaints, submissions, referrals, or responses, and any documents referencing proceedings before that body;

13. The Missouri Office of Chief Disciplinary Counsel, including any communications, complaints, submissions, filings, or correspondence of any kind;

14. [redacted]

15. [redacted]

16. [redacted]

17. [redacted]

**Categories Of Preserved Materials** include, but are not limited to the following specific categories of documents and ESI, which must be preserved in their entirety:

## I. Statements, Publications, and Content

a. All written, recorded, or published statements — whether in articles, blog posts, social media posts, videos, podcasts, newsletters, emails, or any other format — concerning or referencing any person or entity with whom litigation is anticipated;

b. All drafts, outlines, notes, source materials, and editorial communications related to any published or unpublished content concerning any such person or entity;

c. All records identifying sources, tipsters, informants, or contributors to any such content;

d. All records of publication, distribution, sharing, or amplification of any such content, including analytics, audience data, and engagement metrics;

e. All records of corrections, retractions, takedowns, or modifications to any such content, and all communications related thereto.

## II. Business and Financial Records

a. All contracts, agreements, letters of engagement, invoices, payment records, and financial transactions with or between any of the individuals or entities identified in this Schedule of Materials;

b. All records of revenue generated from, or expenses incurred in connection with, any of the identified publications or entities;

c. All records reflecting referral arrangements, revenue sharing, advertising arrangements, affiliate relationships, or other financial arrangements involving any identified person or entity;

**III. Communications**

a. All emails, text messages, direct messages, instant messages, voicemails, and other electronic or written communications — regardless of platform — sent to, received from, or referencing any of the individuals or entities identified in this Schedule of Materials;

b. All communications on any social media platforms, including but not limited to Facebook, X (*formerly* Twitter), LinkedIn, Instagram, YouTube, Telegram, Signal, WhatsApp, Discord, or any other messaging or social platform;

c. All communications made through any business collaboration tools, including but not limited to Slack, Microsoft Teams, Google Workspace, or similar platforms;

d. All calendar entries, meeting records, and scheduling communications related to or involving any identified individual or entity.

**IV. Regulatory and Disciplinary Matters**

a. All documents, communications, filings, submissions, complaints, responses, and records of any kind relating to any regulatory, disciplinary, bar, licensing, or governmental proceeding involving any of the identified individuals or entities;

b. All documents reflecting the initiation, preparation, filing, or follow-up of any complaint or report to any bar association, licensing board, regulatory agency, or governmental body concerning any person or entity with whom litigation is anticipated;

c. All communications coordinating, encouraging, soliciting, or facilitating the submission of any such complaint or report.

**V. Business Relationships and Third-Party Contacts**

a. All documents and communications relating to any person's or entity's business relationships, professional reputation, client relationships, referral sources, contractual arrangements, or business opportunities with or involving any of the identified individuals or entities;

b. All documents and communications reflecting any effort to contact, communicate with, or make representations to any third party regarding the professional qualifications, character, reputation, fitness, or conduct of any person with whom litigation is anticipated;

c. All documents and communications reflecting any effort to discourage, interfere with, or disrupt any existing or prospective business, contractual, or professional relationship involving any person with whom litigation is anticipated;

d. All records of outreach, communication, or coordination among any combination of the identified individuals or entities.

## VI. Electronically Stored Information

a. All ESI on all devices, systems, and platforms under your possession, custody, or control, including but not limited to desktop computers, laptops, tablets, mobile phones, external hard drives, USB drives, and any cloud-based storage platforms (e.g., Google Drive, Dropbox, iCloud, OneDrive);

b. All archived, backed-up, cached, or otherwise stored versions of any of the above-described documents and communications;

c. All metadata associated with any relevant documents or communications, which must be preserved in native format and must not be stripped, altered, or overwritten

d. All web browsing history, search records, and download records related to any of the identified individuals, entities, or subject matters;

e. All domain registration records, hosting account records, web server logs, and content management system records related to any of the identified publications or websites.