

No. 25-\_\_\_\_

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IN THE  
**Supreme Court of the United States**

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LOUIS B. ANTONACCI,  
*Petitioner,*  
v.

RENU BRENNAN, *et al.,*  
*Respondents.*

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**On Petition for Writs of Certiorari to the  
Supreme Court of Virginia**

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**PETITION FOR WRITS OF CERTIORARI**

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## QUESTIONS PRESENTED

Whether this Court’s decision in *Loper Bright Enterprises v. Raimondo*, 144 S. Ct. 2244 (2024) militates in favor of abrogating the prosecutorial discretion of the Virginia State Bar, and its Bar Counsel, in bringing misconduct complaints, against Virginia attorneys who are U.S. citizens, for conduct that no reasonable lawyer or layperson could deem misconduct under the Virginia Rules of Professional Conduct, because such a misconduct complaint violates the due process protections in the Fifth and Fourteen Amendments of the U.S. Constitution.

Whether this Court’s decision in *Loper Bright Enterprises v. Raimondo*, 144 S. Ct. 2244 (2024) militates in favor of abrogating the prosecutorial discretion of the Virginia State Bar, and its Bar Counsel, in bringing misconduct complaints, against Virginia attorneys who are U.S. citizens, in retaliation against that attorney for his protected, ideological speech, because such a misconduct complaint violates the due process protections in the First and Fourteen Amendments of the U.S. Constitution.

Whether Virginia Rules of Professional Conduct 1.6 and/or 1.9 are unconstitutionally vague under the Fifth and Fourteenth Amendments of the U.S. Constitution, on their face or as applied, if a Virginia lawyer who is a U.S. citizen may be guilty of misconduct for disclosing allegedly “confidential” client information to support his claims in a lawsuit against that client.

Whether the Virginia State Bar denied the petitioner, an attorney and U.S. citizen, due process of law under the Fifth and Fourteenth Amendments of the

Professional Conduct 1.6 and/or 1.9 in an unconstitutionally vague manner, when it filed a complaint alleging that the petitioner violated the Virginia Rules of Professional Conduct by alleging, in a federal lawsuit, that principals of his firm's former client engaged in a conspiracy to infiltrate his protected computer systems and sabotage his legal career, when the federal court dismissed the complaint in an unpublished opinion, affirmed on an unpublished appeal, and no court had ever sanctioned, disciplined or ever reprimanded the petitioner before the action in question.

Whether the Virginia State Bar denied petitioner, an attorney and U.S. citizen, due process of law under the Fifth and Fourteenth Amendments of the U.S. Constitution, or applied Virginia Rule of Professional Conduct 3.1 in an unconstitutionally vague manner, by proceeding with a complaint alleging he violated the Virginia Rules of Professional Conduct by filing "frivolous" allegations in federal court, when the complainant never proceeded under Federal Rule of Civil Procedure 11 with respect to the supposedly frivolous allegations, no sanctions were imposed by petitioner in the underlying proceedings, nor had the petitioner ever been disciplined or sanctioned by any court, tribunal, or bar association, and the federal courts in question only deemed the allegations "frivolous" in unpublished opinions with no precedential value whatsoever.

Whether the Virginia State Bar's act of filing a bar complaint against petitioner, an attorney and U.S. citizen, which has no basis under the Virginia Rules of Professional Conduct, constitutes unconstitutional retaliation, under the First and Fourteenth Amendments of the U.S Constitution for the petitioner's

enterprise affiliated with Rahm Israel Emanuel and the Democratic National Committee.

Whether writs of mandamus and/or prohibition must lie, pursuant to the First, Fifth, and/or Fourteenth Amendments of the U.S. Constitution, to prevent U.S. citizens from being subject to unconstitutional forfeiture, particularly when that forfeiture is in retaliation for the citizen's protected speech.

To the extent the Virginia State Bar's complaint against the petitioner does not deny him due process of law *per se*, whether the petitioner, a U.S. citizen, was denied due process of law by Judge Kimberly Irving, Prince William County Circuit Court, the Circuit Court for the City of Alexandria, and/or Virginia State Bar Counsel Renu Brennan, under the Fifth and Fourteenth Amendments of the U.S. Constitution, who never provided petitioner notice that a memorandum opinion suspending his law license in Virginia was entered, thus preventing petitioner from timely filing his notice of his appeal of statutory right, and by falsely claiming that he waived his objections to the suspension of his law license.

Whether the Supreme Court of Virginia denied petitioner, a U.S. citizen, due process of law, under the Fifth and Fourteenth Amendments of the U.S. Constitution, by denying his motion to extend time to file his notice of appeal from the Circuit Court for the City of Alexandria, and thereby dismissing his appeal of statutory right as untimely, when there was no prejudice to the Virginia State Bar and Antonacci filed a sworn declaration with his notice of appeal, with substantiating correspondence, proving that petitioner did not receive the memorandum opinion in a manner that would have allowed him a timely appeal.

## **PARTIES TO THE PROCEEDING**

Petitioner is Louis B. Antonacci.

Respondents are Renu Brennan, in her official capacity as Bar Counsel for the Virginia State Bar, and the Virginia State Bar, a public governmental entity subject to suit as an entity separate from the Commonwealth of Virginia.

## RELATED PROCEEDINGS

### **The Supreme Court of Virginia**

*Louis B. Antonacci v . Renu Brennan, et. al.*, Record No. 250106 (petition for writs of prohibition and mandamus filed February 7, 2025, denied September 8, 2025)

### **Circuit Court for the City of Alexandria**

*Virginia State Bar v. Louis B. Antonacci*, Case No. CL25000531 (Memorandum Order issued June 30, 2025, suspending petitioner's license in the Commonwealth of Virginia for one year and two days—order falsely claims petitioner waived his right to object, as noted in appeal)

### **District of Columbia Court of Appeals**

*In Re Louis B. Antonacci, Esquire*, Disciplinary Docket No. 2025-D108 (Filed October 27, 2025, seeking reciprocal discipline with Virginia suspension)

### **United States Supreme Court**

*Louis B. Antonacci v. Rahm Israel Emanuel, et. al.*, Sup. Ct. No 24-1094 (petition for a writ of certiorari denied June 2, 2025)

### **United States Court of Appeals (4th Cir.)**

*Louis B. Antonacci v. Rahm Israel Emanuel, et. al.*, No. 24-1544(L) (unpublished opinion and judgment entered April 9, 2025)

*Louis B. Antonacci v. BEAN LLC d/b/a Fusion GPS*, No. 24-1545 (consolidated with 24-1544)

*In Re Louis B. Antonacci*, Sup. Ct. No 24-1013  
(petition for a writ of mandamus docketed March 19,  
2025, voluntarily dismissed May 22, 2025)

**United States District Court (E.D. Va.)**

*Louis B. Antonacci v. Rahm Israel Emanuel, et. al.*, No. 1:24-cv-00127 (unpublished appealable orders issued May 23, 2024 and June 7, 2024)

**United States Court of Appeals (7<sup>th</sup> Cir.)**

*Antonacci v. City of Chicago*, 640 F. App'x 553  
(unpublished order entered March 18, 2016)

**United States District Court (N.D. Ill.)**

*Antonacci v. City of Chicago*, 2015 WL  
13039605 (unpublished order entered May 5, 2015)

**Appellate Court of Illinois, First District,  
First Division (Chicago, Ill.)**

*Antonacci v. Seyfarth Shaw, et. al.*, 39 N.E.3d  
225 (Aug. 17, 2015)

**Cook County Circuit Court, Law Division  
(Chicago, Ill.)**

*Antonacci v. Seyfarth Shaw, et. al.*, No. 12-L-  
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## PETITION FOR WRITS OF CERTIORARI

Petitioner Louis B. Antonacci (“Antonacci” or “petitioner”), pursuant to Sup. Ct. R. 12.4, respectfully petitions this Court for writs of certiorari to review two closely related judgments of the Supreme Court of Virginia.

Antonacci primarily petitions for writ of certiorari to review the September 8, 2025 order of the Supreme Court of Virginia denying his petition for writs of prohibition and mandamus. Because the Virginia State Bar’s complaint against Antonacci is barred by the U.S. Constitution, the June 30, 2025 memorandum order of the Circuit Court for the City of Alexandria suspending Antonacci’s law license must also be voided and vacated.

In the alternative, Antonacci petitions this Court for a writ of certiorari to review the November 21, 2025 order of the Supreme Court of Virginia denying his motion to extend time to file his notice of appeal of the order suspending his bar license, in light of the prejudicial omission perpetrated by the lower courts and the Virginia State Bar, and further dismissing his appeal of right. In this scenario, Antonacci requests this Court rule on the constitutional issues presented in his petition for appeal, to the Supreme Court of Virginia, in this case.

Antonacci resigned from the Virginia Bar shortly after his suspension, because it is no longer a legal institution, but he seeks to amend his resignation order to have resigned in in good standing. Similarly, voiding and vacating Antonacci’s suspension order will prevent his reciprocal

suspension by other bar associations, such as the District of Columbia's Office of Disciplinary Counsel, who has already temporarily suspended Antonacci's law license in the District of Columbia pending a hearing on his reciprocal suspension. *See In re Louis B. Antonacci*, D.C. Court of Appeals DDN: 2025-D108.

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## OPINIONS BELOW

The Supreme Court of Virginia's September 8, 2025 opinion is unpublished and reproduced at app. 3a. The Supreme Court of Virginia's November 21, 2025 order denying his motion to extend time and dismissing his appeal of the June 30, 2025, memorandum order of the Circuit Court for the City of Alexandria, suspending Antonacci's law license, is also unpublished and reproduced at app. 1a.

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## JURISDICTION

The Supreme Court of Virginia issued its order on September 8, 2025. This Court has jurisdiction pursuant to 28 U.S.C. §1257(a) because the petitioner contends that the Virginia State Bar's instant application of Rules 3.1, 1.6 and 1.9 of the Virginia Rules of Professional Conduct are repugnant to the Constitution of the United States, and because the Virginia State Bar's persecution of Antonacci has denied him due process of law under the Constitution of the United States.

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

This case involves the following constitutional and statutory provisions:

**U.S. Const. Amend. I**, which states, in relevant part, “Congress shall make no law...abridging the freedom of speech...or the right of the people...to petition the Government for a redress of grievances.”

**U.S Const. Amend V**, which states, in relevant part, “[n]o person shall be . . . deprived of life, liberty, or property, without due process of law.”

**U.S Const. Amend XIV, §1**, which states, in relevant part:

No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

**Virginia Const., Art. I, sec. 11**, which states, in relevant part: “Due process of law; obligation of contracts; taking or damaging of private property; prohibited discrimination; jury trial in civil cases,” which states, in relevant part,

[t]hat no person shall be deprived of his life, liberty, or property without due process of law;...

That in controversies respecting property, and in suits between man and man, trial by jury is preferable to any other, and ought to be held sacred.

**Virginia Const., Art. I, sec. 12** which states, in relevant part: “Freedom of speech and of the press; right peaceably to assemble, and to petition,” which states, in relevant part, “[t]hat the freedoms of speech and of the press are among the great bulwarks of liberty, and can never be restrained except by despotic governments; that any citizen may freely speak, write, and publish his sentiments on all subjects, being responsible for the abuse of that right;”

**Va. Code Section 54.1-3935**, which states, in relevant part: Procedure for disciplining attorneys by three-judge circuit court.

D. The attorney, may, as of right, appeal from the judgment of the three-judge circuit court to the Supreme Court pursuant to the procedure for filing an appeal from a trial court, as set forth in Part 5 of the Rules of Supreme Court of Virginia. In any such appeal, the Supreme Court may, upon petition of the attorney, stay the effect of an order of revocation or suspension during the pendency of the appeal. Any other sanction imposed by a three-judge circuit court shall be automatically stayed prior to or during the pendency of the appeal.

**Va. Rule Prof. Cond. 1.6(b)(2)**, which states,

in relevant part:

### 1.6 Confidentiality of Information

(a) A lawyer shall not reveal information protected by the attorney-client privilege under applicable law or other information gained in the professional relationship that the client has requested be held inviolate or the disclosure of which would be embarrassing or would be likely to be detrimental to the client unless the client consents after consultation, except for disclosures that are impliedly authorized in order to carry out the representation, and except as stated in paragraphs (b) and (c).

(b) To the extent a lawyer reasonably believes necessary, the lawyer may reveal:

(1) such information to comply with law or a court order;

(2) such information to establish a claim or defense on behalf of the lawyer in a controversy between the lawyer and the client, to establish a defense to a criminal charge or civil claim against the lawyer based upon conduct in which the client was involved, or to respond to allegations in any proceeding concerning the lawyer's representation of the client;

**Va. Rule Prof. Cond. 1.9(c)**, which states, in relevant part:

(c) A lawyer who has formerly represented a client in a matter or whose present or former firm has formerly represented a client in a matter shall not thereafter:

(1) use information relating to or gained in the course of the representation to the disadvantage of the former client except as Rule 1.6 or Rule 3.3 would permit or require with respect to a client, or when the information has become generally known; or

(2) reveal information relating to the representation except as Rule 1.6 or Rule 3.3 would permit or require with respect to a client.

**Va. Rule Prof. Cond. 3.1**, which states, in relevant part:

A lawyer shall not bring or defend a proceeding, or assert or controvert an issue therein, unless there is a basis for doing so that is not frivolous, which includes a good faith argument for an extension, modification or reversal of existing law. A lawyer for the defendant in a criminal proceeding, or the respondent in a proceeding that could

result in incarceration, may nevertheless so defend the proceeding as to require that every element of the case be established.



## STATEMENT OF THE CASE

Antonacci is an attorney whose law license was suspended in retaliation for his protected, ideological speech against a Zionist criminal enterprise associated with Rahm Israel Emanuel and the Democratic National Committee. Antonacci's suspension further denies him due process of law because no reasonably intelligent attorney or layperson could read the Virginia Rules of Professional Conduct and conclude that they could be guilty of misconduct for disclosing client information in a lawsuit against that client. App. 3a. The Supreme Court of Virginia dodged the issue by ruling that his writs of petition and mandamus could not lie to prevent this unconstitutional persecution. App. 3a-7a. The Supreme Court of Virginia is wrong because the writs must lie to prevent the Virginia State Bar from denying Virginia attorneys their constitutional right to due process of law by subjecting them unconstitutional harassment and persecution, particularly since this Court's decision in *Loper Bright*.

Antonacci previously reproduced his petition for writs of prohibition and mandamus, before the Supreme Court of Virginia, in the appendix to his petition for writ of certiorari in *Louis B. Antonacci v. Rahm Israel Emanuel*, Sup. Ct. No 24-1094. Pet. app. 629a-56a.

Antonacci is an attorney who has been admitted to practice since 2004. He is admitted in Wisconsin, the District of Columbia, and Maryland. He is admitted to practice before the U.S. District Courts for the Eastern District of Virginia (2009) and the Western District of Wisconsin (2004), the U.S. Courts of Appeals for the Fourth (2024) and Seventh (2015) Circuits, and this Court (2016). Antonacci has been lead counsel in commercial disputes ranging from \$50,000 to \$30,000,000 at issue.

Antonacci has obtained and maintained security clearances with both the U.S. Departments of Defense and Justice. Antonacci had never been subject to any disciplinary action by any court or bar, nor had a bar complaint ever been filed against him before the complaint that is the subject of this petition. Antonacci is a private citizen and has never been a public figure.

In 2009, when Antonacci was an associate in the Washington, DC office of Defendant Holland & Knight LLP, he successfully prosecuted a civil RICO action in the U.S. District Court for the Eastern District of Virginia, where a Virginia lawyer, Gerald I. Katz, was the architect of the enterprise and its racketeering activity. *Bovis Lend Lease, Inc. v. Waterford McLean LLC et. al.*, 1:09-cv-00927 LMB-TRJ (E.D.Va. 2009). Katz has since been disbarred.

Antonacci organized his law firm, Antonacci PLLC f/k/a Antonacci Law PLLC in 2014. He is, and always has been, the sole member of his member-managed PLLC.

On February 14, 2024, Antonacci filed a

complaint, in the Eastern District of Virginia, alleging against thirteen defendants, civil violations of the Racketeer Influenced and Corrupt Organizations Act (18 U.S.C. § 1962 “RICO”), Virginia Statutory Business Conspiracy Va. Code § 18.2-499, Common Law Civil Conspiracy, and the Computer Fraud and Abuse Act (18 U.S.C. § 1030): *Louis B. Antonacci v. Rahm Israel Emanuel, et. al.*, EDVA civil no. 1:24-cv-127.

One of the thirteen defendants in that action was a former client of Antonacci PLLC: Storij, Inc. d/b/a STOR Technologies d/b/a The So Company d/b/a Driggs Research International, a for-profit Delaware C-corp (“Storij” or the “Company”). As of March 2019, Storij had issued 9,979,717 shares.

As alleged in his complaint, Antonacci was introduced to the Complainant, Shaun So, on April 29, 2015, when he returned to Washington, DC after filing a RICO complaint against, among others, the City of Chicago, when Rahm Emanuel was Mayor, and Perkins Coie LLP, which was legal counsel for the Democratic National Committee and Hilary for America. Neither Antonacci nor Antonacci PLLC has ever represented Shaun So or Richard Wheeler in any legal or other fiduciary capacity.

The April 29, 2015 meeting took place at Churchkey Tavern in Washington, DC. As alleged in the complaint, Charles Galbraith, a DC political lawyer and half-wit who worked with Rahm Emanuel in the Obama White House, introduced Antonacci to the Complainant, Shaun So, “CEO” of Storij, and Richard Wheeler, another employee of Storij.

As alleged in the complaint, Galbraith sat with

them while So and Wheeler discussed the one tour they both did in the Army, where So reportedly did work in human intelligence and interrogation, and Wheeler in signals intelligence, exploiting cellular and mobile networks and computer systems. As also alleged in the complaint, So, Wheeler and Galbraith (who was not representing So, Wheeler or Storij, nor was he acting in any fiduciary capacity), represented to Antonacci that Storij was building its government contracts practice, doing primarily digital content work.

Storij later retained Antonacci PLLC for legal services related to its government contracts work. Antonacci provided legal services to Storij from 2015 to approximately October of 2021, which included representing Storij with respect to the review, negotiation and compliance with its prime contracts and subcontracts with the Department of Veteran Affairs, the Centers for Medicare and Medicaid Services, the U.S. Department of the Navy, the U.S. Department of the Air Force, the Department of Defense, Ad Hoc LLC, Oddball, Inc., Touch Lab Events, LLC d/b/a Touchlab, TISTA Science and Technology Corporation, inter alia. Antonacci further advised the Company on employment matters, drafted the Company's employee handbook, registered the Company in numerous States where its remote employees resided, and advised on bid protests and litigation risk. Antonacci further advised the Company on corporate financing and corporate governance, drafting their bylaws, corporate resolutions, and promissory notes and stock purchase agreements, through which the Company raised capital and issued equity.

Over those six years of legal services, Storij paid Antonacci PLLC approximately \$273,000 in legal fees,

yet never issued Antonacci PLLC a U.S. tax form 1099, as alleged in the complaint. Based on the facts alleged in his EDVA complaint, together with the additional information Antonacci later provided to Bar Counsel, Antonacci has reasonably inferred that Storij is a front company for illegally spying on U.S. citizens, at the behest and for the benefit of the criminal enterprise alleged in the EDVA complaint.

The facts alleged in the EDVA complaint were sufficient for a reasonable jury to conclude that Storij and its codefendants are liable to Antonacci for the conduct alleged, although Antonacci need only have a reasonable basis for bringing his claims. This point bears repeating: The verifiable facts alleged in the EDVA complaint were sufficient for a reasonable jury to infer, as Antonacci did, by a preponderance of the evidence, that Storij and its codefendants are liable to Antonacci for the conduct alleged.

In particular, in 2019, Antonacci PLLC was retained by Lane Construction Corp., for, among other matters, its commercial dispute with AECOM Technical Services, Inc., related to Lane's design-build contract with Transurban LLC for the 395 Express Lanes in Arlington, Alexandria, and Fairfax counties.

On November 19, 2020, when Biden's victory in the 2020 presidential election seemed assured, AECOM filed a complaint against Lane, in Fairfax County Circuit Court, for \$20,000,000 in damages related to its design work on the that Project. As alleged in the complaint, shortly after Biden took office on January 20, 2021, So and Wheeler asked Antonacci to have a Zoom videoconference, whereby Wheeler hacked Antonacci's computer systems and mobile phone, so he could

monitor Antonacci's conduct, planning, and strategy throughout the case.

Relatedly, as alleged in the complaint, Seth T. Firmender, former General Counsel of Lane, hired Antonacci PLLC in order to try to set up Antonacci for a criminal fraud investigation related to false claims orchestrated by Firmender. After Antonacci's representation of Lane ended in October 2021, Antonacci did not hear from Storij for additional government contracts work, except for two incidents in 2022, which Antonacci relayed to Bar Counsel, where the timing of the requests coincided with other acts perpetrated by this criminal enterprise.

On May 13, 2024, Bar Counsel served Antonacci with Shaun So's Bar Complaint against Antonacci: VSB Docket No. 24-041-132040. Because the complaint alleges only that Antonacci disclosed information arising out of Antonacci PLLC's representation of Storij in relation to Antonacci's civil case in the EDVA, Antonacci inquired to Bar Counsel as to what misconduct the complaint alleged against Antonacci. Bar Counsel did not then, nor has it ever, identified any misconduct alleged by the Complainant.

Virginia Sup. Ct. R. 13-10 requires Bar Counsel to dismiss any complaint that does not present an issue under the Disciplinary Rules. Antonacci stated that the bar complaint should be dismissed because it does not allege misconduct, but Bar Counsel demanded a response nonetheless.

Neither Storij, nor any of the other defendants in the EDVA, filed a Rule 11 motion against Antonacci. The district court in the EDVA did not impose any

sanction on Antonacci. No court has ever sanctioned or even reprimanded Antonacci. Storij and the other defendants in the EDVA case did not file Rule 11 motions because that would allow Antonacci discovery, and they could not withstand any factual investigation.

Shaun So's bar complaint therefore demonstrates a lack of character that is consistent with Antonacci's allegations in his complaint. Antonacci provided two formal responses to the bar complaint. On May 23, 2024, EDVA District Judge Michael Nachmanoff, a Biden appointee, dismissed Antonacci's complaint for want of subject matter jurisdiction. Judge Nachmanoff's opinion totals four pages. Antonacci's complaint includes 574 discrete allegations and 11 substantiating exhibits comprising 546 pages. Antonacci perfected his appeal of the dismissal on June 11, 2024 (the "Appeal").

Exactly one week later, on June 18, 2024, Antonacci was involved in a collision with a motor vehicle that ran a red light while Antonacci was cycling on his triathlon bike going over 20 miles per hour, on the same route that he rides two or three times per week. The vehicle fled the scene of the crime. Arlington County police refused to prosecute the driver, despite there being a witness willing to testify that she was clearly at fault. Antonacci broke his collarbone and had two reconstructive surgeries to repair it. Antonacci filed his reply brief in the Appeal on April 9, 2024, which was three days earlier than required, in order to accommodate his surgery schedule.

On April 10, 2024, the day of his second reconstructive surgery, as Antonacci had indicated in his reply brief, VSB investigator Robert Graves

demanded that Antonacci attend an interview related to his investigation. Antonacci refused to attend the interview until Bar Counsel issued a subpoena commanding Antonacci's presence. Bar Counsel issued such a subpoena.

Antonacci attended the interview on October 8, 2024. On December 19, 2024, Bar Counsel served Antonacci with the Fourth District's Certification of the matter. On January 19, 2024, Bar Counsel served Antonacci with its Certification and Subcommittee Determination.

The language quoted by Bar Counsel in paragraphs ten and eleven of its complaint are all from unpublished opinions. *Antonacci v. City of Chicago*, 2015 WL 13039605 (N.D. Ill. May 5, 2015); *Antonacci v. City of Chicago*, 640 F. App'x 553 (7th Cir. 2016). The reasoning of those opinions is both unsound and invalid, as set forth in the petitions for writ of certiorari that Antonacci filed with this Court. S. Ct. Case Nos. 24-1094; 15-1524.

Rule 1.6 states, in part:

#### 1.6 Confidentiality of Information

(a) A lawyer shall not reveal information protected by the attorney-client privilege under applicable law or other information gained in the professional relationship that the client has requested be held inviolate or the disclosure of which would be embarrassing or would be likely to be detrimental to the client unless the client

consents after consultation, except for disclosures that are impliedly authorized in order to carry out the representation, and except as stated in paragraphs (b) and (c).

(b) To the extent a lawyer reasonably believes necessary, the lawyer may reveal:

(1) such information to comply with law or a court order;

**(2) such information to establish a claim or defense on behalf of the lawyer in a controversy between the lawyer and the client, to establish a defense to a criminal charge or civil claim against the lawyer based upon conduct in which the client was involved, or to respond to allegations in any proceeding concerning the lawyer's representation of the client;...**

Bar Counsel's only allegations of misconduct in its complaint, besides alleging that Antonacci filed a frivolous complaint that is still on appeal, are Antonacci's statements in his EDVA complaint, all of which involve claims against Storij, and its codefendants, made by and on behalf of Antonacci. Antonacci is therefore allowed to make those statements pursuant to Rule 1.6(b)(2).

As set forth in his petition for writs of prohibition and mandamus, Bar Counsel's misapplication of Rule

1.6 (which provides the exceptions to Rule 1.9), is a violation of Antonacci's due process rights under Amendments V and XIV of the U.S. Constitution. Bar Counsel's prosecution of Shaun So's bar complaint is unconstitutionally vague because it does not give Antonacci, or other Virginia lawyers, fair notice of conduct that could subject them to disciplinary action. Bar Counsel's misapplication of Rules 1.6 and 1.9 will therefore allow clients to defraud Virginia lawyers with impunity. If Rules 1.6 and 1.9 may be construed in this manner, then then they are unconstitutionally vague, and must be struck down.

Bar Counsel's complaint expressly criticizes Antonacci's allegations, in his EDVA complaint, that the Complainant and other defendants engaged in racketeering activity against Antonacci at the behest of Joe Biden and Rahm Emanuel, the latter of whom is a defendant in the EDVA complaint, and Antonacci's former employers, who also have deep connections to the DNC.

As alleged in the EDVA complaint, Antonacci worked at a law firm in Chicago, while Emanuel was Mayor, doing work with the City of Chicago's Department of Procurement Services. Antonacci questioned the constitutionality of some affirmative action programs proposed by Seyfarth Shaw and Anita Ponder, and was later critical of Mayor Emanuel in general.

In addition, Antonacci makes the following statement in his Fourth Circuit briefs:

Antonacci has plainly alleged how each of these Appellees conducted

the affairs of this enterprise, invested and maintained their interests therein, and conspired to commit the predicate acts alleged in the complaint. Rahm Emanuel, the H&K Defendants, and the Perkins Defendants are the central leadership of this criminal enterprise, as all of them have deep ties to the DNC, as alleged in the complaint.

Bar Counsel's and the District Committee's prosecution of this matter is retaliation for Antonacci's protected political, ideological speech. The Commonwealth of Virginia has a compelling state in protecting political, ideological speech. Bar Counsel's prosecution of this bar complaint will have a chilling effect on protected speech and cause Virginia lawyers to self-censor.

Antonacci's statements are protected speech under the First Amendment of the U.S. Constitution. Antonacci's statements are protected speech under Article 1, Section 12, of the Virginia Constitution. Antonacci's statements are further protected by Virginia's absolute litigation privilege.

Bar Counsel's certification further claims that Antonacci violated Rule 3.1 by filing a civil complaint "found to be legally frivolous and is unsupported by evidence." Antonacci's claims are not frivolous and they are supported by evidence. Antonacci perfected the Appeal of Judge Nachmanoff's baseless and unpublished ruling that Antonacci's claims are frivolous, which was affirmed by the Fourth Circuit in

another unpublished ruling. These unpublished rulings have no precedential value and cannot form the basis of a misconduct determination, particularly when Antonacci has never been sanctioned or disciplined by any court or tribunal prior to the judicial and prosecutorial disgrace that took place in Alexandria, Virginia. Bar Counsel's claim that Antonacci violated Rule 3.1 violates Antonacci's right to due process of law and is simply retaliation for his protected political speech.

Bar Counsel's prosecution of this case, besides having no basis under the Virginia Rules of Professional Conduct, denies Antonacci due process of law by forcing the adjudication of factual issues in dispute in the EDVA case, while denying Antonacci his right to adjudicate his case, and get discovery from Storij and the other twelve defendants and other relevant third parties, such as Lane Construction Corp. Antonacci has no adequate remedy or recourse at law.

Notably, EDVA Defendant Seth T. Firmender, who was General Counsel of Lane and orchestrated the AECOM Fraud identifies in the EDVA complaint, fled Lane when Antonacci first attempted to have Firmender served. The CEO of Lane, Mark Shiller, also instrumental to the AECOM Fraud, also fled Lane when Firmender was served with the complaint.

Similarly, EDVA Defendant Matthew J. Gehringer, former General Counsel of Perkins Coie LLP, who orchestrated this enterprise's criminal campaign against Antonacci in Chicago, and its continuing campaign against Antonacci in the Commonwealth of Virginia, fled Perkins Coie after Antonacci opened the EDVA action in PACER, but

before Antonacci filed the complaint. Antonacci had not named Gehringer in his original draft of the complaint, but when Antonacci saw that he tried to run, Antonacci was able to name Gehringer as a defendant and have him served.

On February 7, 2025, Antonacci filed his Answer to Bar Counsel's complaint. Antonacci objected to the jurisdiction of Bar Counsel and the District Committee and elected to terminate the proceedings before the District Committee, pursuant to Va. Code Section 54.1-3935, to the extent the Supreme Court of Virginia did not grant his Petition for Writs of Mandamus and Prohibition and Mandamus, which he filed in the Supreme Court of Virginia the same day.

On January 29, 2025 Antonacci notified Bar Counsel of his intent to file his Petition for Writs of Prohibition and Mandamus. As early as September 26, 2024, Antonacci notified Bar Counsel that its prosecution of VSB Docket No. 24-041-132040 denied Antonacci due process of law. Antonacci notified Bar Counsel that Mr. So's complaint has no basis under the Virginia Rules of Professional Conduct on May 13, 2024, the day he received it.

Nonetheless, the Supreme Court of Virginia abdicated its judicial responsibility and simply sat on Antonacci's petitions for writs of prohibition and mandamus until September 8, 2025. App. 3a-7a. The Chief Justice of that court, Bernard Goodwyn, appointed a panel of Virginia Circuit Court Judges on March 28, 2025, shortly after he announced his retirement from the bench only one year into his term as Chief Judge.

That panel held a hearing on June 11, 2025, in the Circuit Court for the City of Alexandria. Shaun So did not even have the courage to actually appear at the hearing. Instead, he appeared via videoconference, claiming that he was required to attend an unspecified “international business delegation” during the hearing he had demanded. This allowed the video to cut out whenever the esteemed complainant needed coaching on a question he did not know how to answer.

The hearing itself—which conveniently occurred one week after Antonacci’s petition for writ of certiorari in his EDVA case against Rahm Israel Emanuel and company was denied—was a legal abomination in every way imaginable. The panel allowed in reams of hearsay and paid no mind to the fact that there was no legal basis for the Virginia State Bar’s assertions of misconduct. The Virginia State Bar’s investigator, Robert Graves, could not even articulate any credible reason why his supposed investigation was limited to the complainant, the accused, and the accused’s little brother, who is a high school dropout, convicted felon, and lifelong drug addict.

Incredibly, the hearing concluded by Bar Counsel and the panel claiming that Antonacci demonstrated evidence of impairment after they found misconduct during an eight-hour hearing where he presented evidence, cross-examined witnesses, and testified on his own behalf. The Virginia State Bar actually instituted impairment proceedings, but Antonacci had already submitted his application to resign from that institution. Antonacci’s resignation order was effective September 3, 2025. App. 14a.

The panel found misconduct and suspended

Antonacci's law license for one year and two days, despite that Antonacci has practiced for over twenty years and never had any prior disciplinary issue. The panel then issued an order falsely stating that Antonacci had waived his right to object to the hearing. App. 9a-11a. Worse yet, "Chief Judge" of the panel, Kim Irving, deliberately failed to send Antonacci a copy of the order she signed. *Id.* As did the clerk of her court, Prince William County Circuit Court, and the Circuit Court of the City of Alexandria. *Id.*

Antonacci was eventually notified of the order by the Virginia State Bar, long after the appeal window had lapsed. Antonacci nonetheless filed his notice of appeal within 21 days after he was notified of the order, together with the transcript of the proceedings and sworn declaration attesting to the panel's deliberate failure to provide him notice. Antonacci petitioned the Supreme Court of Virginia within the 90-day window of the panel's order. Va. Sup. Ct. R. 5:17(a). But on November 21, 2025, the Supreme Court of Virginia denied his motion to extend time to file his notice and dismissed his appeal of right. App. 1a; Va. Code §54.1-3935.D.

Antonacci appeals those rulings, but the simple fact is that the hearing precipitating the panel's suspension order should never have taken place. Antonacci therefore appeals the Supreme Court of Virginia's denial of his petition for writs of prohibition and mandamus, which it lamely sat on until September 8, 2025. The Supreme Court of Virginia did not even bother addressing Antonacci's constitutional arguments. They dodged the issue by claiming that the writs were not the proper vehicle to address this trampling of our Constitution.



## REASONS FOR GRANTING THE PETITION

The Court should grant this petition because the lower courts have decided an important federal question in a way that conflicts with relevant decisions of this Court, particularly as they relate to the due process protections in the Fifth and Fourteenth Amendments to the United State Constitution. In addition, the Virginia State Bar, the Supreme Court of Virginia, and the Circuit Court for the City of Alexandria are relying on the unpublished vitriol of two federal district courts' unfounded vitriol in order to persecute Antonacci, in retaliation for his protected speech, for conduct that no reasonably intelligent lawyer or layperson could deem professional misconduct.

In addition, because the lower courts prejudiced Antonacci by failing to notify him that it had entered its appealable order until after the time for filing his notice of appeal had lapsed, and the Supreme Court of Virginia denied his motion to extend time despite his inability to timely file his notice of appeal, the lower courts denied Antonacci the right to be heard at a meaningful time and in a meaningful manner, and therefore denied him due process of law under the United States Constitution. Similarly, the lower courts deviated so far from the usual course of judicial proceedings as to call for this Court to exercise its supervisory power.

Finally, granting this petition will aid this Court's appellate jurisdiction over long-term racketeering activity perpetrated by corrupt lawyers

and politicians, which poses an acute, systemic threat to the rule of law and therefore the stability of this republic.

## I. AN ATTORNEY CANNOT BE SUBJECT TO FORFEITURE FOR PROCLAIMING THE SKY IS BLUE

An attorney's lawsuit against his or her former client, alleging the client's tortious misconduct directed at that attorney, cannot be deemed misconduct by the attorney. Va. Rule Prof. Cond. Rule 1.6(b)(2). If a bar complaint against an attorney "does not present an issue under the Disciplinary Rules, Bar Counsel must not open an Investigation, and **the Complaint must be dismissed.**" Va. R. Sup. Ct. 13-10. Courts must use their own judgment to interpret laws, not defer to agencies' interpretation. *Loper Bright Enterprises v. Raimondo*, 144 S. Ct. 2244, 2263 (2024) (overruling *Chevron U.S.A. Inc. v. Natural Resources Defense Council, Inc.*, 467 U.S. 837 (1984)).

The constitutions of both the United States and Virginia guarantee due process of law for each of its citizens, which is intertwined with the right to free expression. U.S. Const. Amends. I, V and XIV; Va. Const. Art. I, Sections 11 and 12. Although the requirements of procedural due process are fluid and fact dependent, the point of procedural due process is to require procedural fairness and to prohibit the state from conducting unfair or arbitrary proceedings. *Johnson v. Morales*, 946 F.3d 911 (6th Cir. 2020); U.S. Const. Amend. XIV; *see also* 16C C.J.S. Constitutional Law § 1884. "[D]ue process is flexible and calls for such procedural protections as the particular situation demands." *Mathews v. Eldridge*, 424 U.S. 319, 334 (1976) (quoting *Morrissey v. Brewer*, 408 U.S.

471, 481 (1972)).

“On several levels, Article I, Section 11 parallels the procedural due-process protections in the Fifth and Fourteenth Amendments to the United States Constitution.... In this respect, we hold that the protections of Article I, Section 11 are at least as strong as the existing understanding of procedural due-process rights secured by the United States Constitution.” *Vlaming v. W. Point Sch. Bd.*, 302 Va. 504, 573–76, 895 S.E.2d 705, 743 (2023). “Under settled procedural due-process principles, a government requirement “is unconstitutionally vague if persons of ‘common intelligence must necessarily guess at [the] meaning [of the language] and differ as to its application.’” *Id.* at 743-44. (quoting *Tanner v. City of Va. Beach*, 277 Va. 432, 439, 674 S.E.2d 848 (2009)).

If a provision of law does not have “ascertainable standards,” then it does not give its citizens the “fair notice” required by the due process clause. *Id.* at 744. “This principle is particularly important when “vague language” implicates free-speech concerns because of the risk that individuals will self-censor “based on a fear that they may be violating an unclear law.”” *Id.* (quoting *Tanner*, 277 Va. at 439); see also *FCC v. Fox Television Stations, Inc.*, 567 U.S. 239, 253-54 (2012) (recognizing that the “requirement of clarity in regulation is essential to the protections provided by the Due Process Clause” and that “[w]hen speech is involved, rigorous adherence to [due-process] requirements is necessary to ensure that ambiguity does not chill protected speech”).

“The constitutional prohibition against vagueness also protects citizens from the arbitrary

and discriminatory enforcement of laws. A vague law invites such disparate treatment by impermissibly delegating policy considerations ‘to policemen, judges, and juries for resolution on an ad hoc and subjective basis, with the attendant dangers of arbitrary and discriminatory application.’” *Tanner*, 277 Va. at 439 (quoting *Grayned v. City of Rockford*, 408 U.S. 104, 108-9 (1972)).

Under Virginia law, the absolute litigation privilege applies to any and all in-court statements, written or oral. *Titan Am., LLC v. Riverton Inv. Corp.*, 264 Va. 292, 308–09 (2002) (finding statement in filed complaint privileged “because of the safeguards in those proceedings, including rules of evidence and penalties for perjury”); *Darnell v. Davis*, 190 Va. 701, 701 (1950) (“[g]enerally the privilege of judicial proceedings is not restricted to trials of civil actions or indictments, but it includes every proceeding before a competent court or magistrate in the due course of law or the administration of justice which is to result in any determination or action of such court or officer”); *Fletcher v. Maupin*, 138 F.2d 742, 742 (4th Cir. 1943) (“[t]he statements contained in the answers filed by the attorneys were true beyond any doubt; in addition to this they were privileged”).

“A writ of prohibition is an extraordinary remedy employed ‘to redress the grievance growing out of an encroachment of jurisdiction.’” *Elliott v. Great Atlantic Management Co., Inc.*, 236 Va. 334, 338 (1988) (quoting *James v. Stokes*, 77 Va. 225, 229 (1883)). “Mandamus is an extraordinary remedy that may be used ‘to compel performance of a purely ministerial duty, but it does not lie to compel the performance of a discretionary duty.’” *Ancient Art Tattoo Studio, Ltd. v. City of Virginia Beach*, 263 Va.

593, 597, 561 S.E.2d 690, 692 (2002) (quoting *Board of County Supervisors v. Hylton Enters., Inc.*, 216 Va. 582, 584, 221 S.E.2d 534, 536 (1976)).

A petition for mandamus or prohibition should be sustained when the petitioner has no adequate remedy at law. *King v. Henning*, 203 Va. 582, 586, 125 S.E.2d 827, 830 (1962).

“[T]he failure to state a proper cause of action calls for a judgment on the merits and not for a dismissal for want of jurisdiction.” *Amazon.com, Inc. v. WDC Holdings LLC*, No. 20-1743, 2021 WL 3878403 at \*5 (4th Cir. Aug. 31, 2021) (quoting *Bell v. Hood*, 327 U.S. 678, 682 (1946), to reverse and remand dismissal of Amazon’s RICO claims). A plaintiff may prove a RICO conspiracy, like the one alleged in Antonacci’s EDVA complaint, “solely by circumstantial evidence.” *Borg v. Warren*, 545 F. Supp. 3d 291, 319 (E.D. Va. 2021); (citing *United States v. Cornell*, 780 F.3d 616, 623 (4th Cir. 2015)).

In both the Fourth and Seventh Circuits, unpublished opinions have no precedential value whatsoever. *Hall v. United States*, 44 F.4th 218, n.11 (4th Cir. 2022); *see also Bankers Tr. Co. v. Old Republic Ins. Co.*, 7 F.3d 93, 94–95 (7th Cir. 1993).

## **II. THE ORDER SUSPENDING ANTONACCI’S LAW LICENSE MUST BE VACATED BECAUSE THE SUPREME COURT OF VIRGINIA ERRED IN DENYING HIS PETITION FOR WRITS OF MANDAMUS AND PROHIBITION**

This action is clearly a political prosecution aimed at baselessly attacking Antonacci for exercising his protected speech and asserting claims for

racketeering activity perpetrated against him by deep state tools of, and a Zionist criminal enterprise associated with, the Democratic National Committee. The object of this prosecution seems to be to get advance discovery from Antonacci and, realizing that his case against the insidious criminal enterprise alleged in his complaint is meritorious, taking away his law license so that he is unable to prosecute it effectively.

These proceedings are a caricature of a real problem in American politics: the weaponization of justice systems. Pursuant to Rule 1.6(b)(2), Antonacci's allegations against Storij and its criminal co-conspirators, in his federal lawsuit, simply cannot constitute misconduct under the Virginia Rules of Professional Conduct. Antonacci has more than a reasonable basis to bring his claims, which are supported by overwhelming circumstantial evidence and therefore sufficient to prove his case in civil court. Va. R. Sup. Ct. 13-10; Va. R. Prof. Cond. 1.6. Moreover, all federal opinions issued in these cases are unpublished and have no precedential value; and Antonacci's in-court statements are protected by Virginia's litigation privilege. *Titan*, 264 Va. at 308–09; *Darnell*, 190 Va. at 701, *Fletcher*, 138 F.2d at 701.

If Antonacci were to have been sanctioned by any of the federal courts in question, that would have been one thing. But that he was not highlights the cowardice of American Jewry. The Zionist defendants and their counsel did not seek to impose sanctions on Antonacci, because that would have allowed discovery. And the Jewish judges felt free to spew their toxic vitriol in unpublished opinions with no precedential value, effectively ruling that their Zionist brethren are immune from civil liability. This

is judicially imposed tort reform and a judicial repeal of RICO to allow criminal Jewry to flourish in America. This criminal enterprise must be stopped.

Antonacci understands that Bar Counsel has discretion, but that discretion cannot be used to bring baseless political prosecutions against members of the Virginia Bar for asserting claims against fraudulent tortfeasors and exercising their constitutional rights. U.S. Const. Amends. V and XIV; Va. Const. Art. I, Section 11; *Loper Bright*, 144 S. Ct. at 2263; *Matthews*, 424 U.S. at 334; *Fox Television Stations*, 567 U.S. at 253-54; *Grayned*, 408 U.S. at 108-9; *Vlaming*, 302 Va. at 573-76; *Tanner*, 277 Va. at 439;. No reasonable lawyer or layperson could read Rules 1.9 and 1.6 and conclude they could be subject to disciplinary action for filing a civil suit against a former client, absent a Rule 11 violation. *Vlaming*, 302 Va. at 573-76; *Tanner*, 277 Va. at 439. And the Virginia State Bar, through its Bar Counsel, should not be afforded any deference in this regard. *Loper Bright*, 144 S. Ct. at 2263.

Neither Storij nor any other defendant even sought a Rule 11 motion in the EDVA, nor were any sanctions imposed on Antonacci, nor has any sanction ever been imposed on him by any court or tribunal. This abuse of bureaucratic power is the hallmark of totalitarian governments, not democratic republics like the United States of America, and would clearly have a chilling effect on lawyers seeking to assert their rights against clients who defrauded them.

As Hannah Arendt sagely surmised: “When Hitler said that a day would come in Germany when it would be considered a disgrace to be a jurist, he was speaking with utter consistency of his dream of a

perfect bureaucracy.” HANNAH ARENDT, *EICHMANN IN JERUSALEM: A REPORT ON THE BANALITY OF EVIL*, Penguin Books, N.Y., N.Y. (1994). Bar Counsel has flipped the legal order on its head in a blatant abuse of bureaucratic power for political purposes. This violates the due process and free speech protections in both the U.S. and Virginia Constitutions, which are fundamental to the proper functioning of the Commonwealth of Virginia and these United States. U.S. Const. Amends. V and XIV; Va. Const. Art. I, Section 11; *Matthews*, 424 U.S. at 334; *Vlaming*, 302 Va. at 573–76; *Tanner*, 277 Va. at 439; *Fox Television Stations*, 567 U.S. at 253–54; *Grayned*, 408 U.S. at 108–9.

When citizens lose faith in their government, and in particular the equitable functioning of legal processes, civil society breaks down.<sup>1</sup> And while Antonacci is starting to believe that is what these people want, the foundational principles of this republic preclude such wanton self-destruction by state actors. That is a feature of this great nation, not a bug.

Antonacci would also like to address Bar Counsel’s not-so-subtle message to him throughout

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<sup>1</sup> “New data from Gallup, a pollster, show that **American trust in several national institutions is on the decline**. That may not be surprising, given the fraught state of the country’s politics, but the **cumulative fall over the twenty years is startling**. **Twenty years ago Americans had the highest confidence in their national government** of people in any G7 country. **Today they have the lowest**. American are tied with Italians in having the **lowest trust in their judicial system**, and come last in faith in honest elections.” THE ECONOMIST, *America’s trust in its institutions has collapsed* (April 17, 2024), available at <https://www.economist.com/united-states/2024/04/17/americas-trust-in-its-institutions-has-collapsed>.

these proceedings. In email correspondence with Bar Counsel's office and Mr. Graves (all the "Little Eichmanns," from Antonacci's perspective), they have separately sent Antonacci follow-up emails with Virginia's seal enlarged to fill the entire screen: "Sic semper tyrannis" (thus always to tyrants).

But Antonacci is no tyrant—this faceless bureaucracy is the despot. Antonacci is a lawyer who has been advocating for truth and justice against a would-be totalitarian regime for some time now. And while the truth can be a bit tyrannical, the duty of our courts of law, of which the Virginia State Bar is a body, is to administer justice by finding the truth not tainted by politics. The Virginia State Bar has flipped our legal order on its head to ensure the truth is not revealed, and that Antonacci is unjustly persecuted for advocating for his rights as citizen of these United States and this Commonwealth. That is how, as Arendt predicted, the perfect bureaucracy disgraces jurists and with them our entire legal system, without which there is no civil society.

Antonacci has no recourse at law. *Henning*, 203 Va. at 586. Antonacci cannot seek discovery in a disciplinary matter, so any adjudication of matters relevant to his case in the Eastern District of Virginia, which is the only matter to which the instant bar complaint pertains, will necessarily be prejudicial to him. And while anyone with a middle-school reading level can ascertain that Antonacci's claims are not frivolous (see, e.g. *Amazon.com*, 2021 WL 3878403 at \*5), the unpublished opinions of two federal courts, where sanctions were not imposed and Antonacci was not reprimanded in any way, cannot be the basis of a rules violation claiming a frivolous claim. Those opinions have no precedential value and Virginia

Circuit Court judges have no jurisdiction to independently evaluate such claims invoking federal subject matter jurisdiction.

Bar Counsel's complaint was an unfounded and arbitrary application of the Virginia Rules of Professional Conduct to prosecute Antonacci for conduct he could not have been on fair notice would violate those Rules. U.S. Const. Amends. V and XIV; Va. Const. Art. I, Section 11; *Matthews*, 424 U.S. at 334; *Vlaming*, 302 Va. at 573–76; *Tanner*, 277 Va. at 439; *Fox Television Stations*, 567 U.S. at 253-54; *Grayned*, 408 U.S. at 108-9. Bar Counsel's complaint is also retaliation for his protected political speech and availing himself of the laws of these United States, and therefore fundamentally a denial of due process of law and Antonacci's freedom of speech. U.S. Const. Amends. V and XIV; Va. Const. Art. I, Sections 11, 12; *Matthews*, 424 U.S. at 334; *Vlaming*, 302 Va. at 573–76; *Tanner*, 277 Va. at 439; *Fox Television Stations*, 567 U.S. at 253-54; *Grayned*, 408 U.S. at 108-9.

The Supreme Court of Virginia dodged the issue of constitutionality by stating that the writs of prohibition and mandamus do not apply to the instant case. They are wrong. The writ of prohibition serves to prevent the state from acting without jurisdiction. Bar Counsel does not have jurisdiction to deprive attorneys of due process of law by subjecting them to prosecution for proclaiming that the sky is blue, which is what Virginia State Bar Counsel has done here. Virginia Rules of Professional Conduct 1.6, 1.9 and 3.1 are unconstitutional as they are being applied to the petitioner. In the alternative, they are unconstitutional on their face and must be struck down.

The Supreme Court of Virginia should be reversed, the June 30, 2025 memorandum order of the Circuit Court for the City of Alexandria declared void and vacated.

**III. ALTERNATIVELY, THIS COURT SHOULD REVERSE THE SUPREME COURT OF VIRGINIA'S ORDER DENYING ANTONACCI'S MOTION TO EXTEND TIME AND DISMISSING HIS APPEAL OF RIGHT**

As stated above, Antonacci did not receive the order suspending his license until after the time to file his notice had lapsed. Antonacci filed his notice and the transcript within 21 days of it being emailed to him by the Virginia State Bar. Antonacci filed a sworn declaration with his notice, and moved the Supreme Court of Virginia to extend time. Antonacci has a statutory right to appeal under Virginia law, which he has been denied. Va. Code Section 54.1-3935.D.

The Supreme Court of Virginia's denial and dismissal deny Antonacci due process of law because he did not have the opportunity to comply with the notice requirements. He was therefore deprived of his statutory right to appeal, and his property interest in practicing law in the Commonwealth, without the opportunity to be heard at a meaningful time and in a meaningful manner. U.S. Const. Amends. V and XIV; Va. Const. Art. I, Section 11; *Matthews*, 424 U.S. at 334. To the extent this Court believes the proceedings below were not a denial of due process on their face, Antonacci requests the opportunity to be heard on appeal in the Supreme Court of Virginia.



## CONCLUSION

Antonacci said it in his petition for writ of certiorari in *Antonacci v. Rahm Israel Emanuel* and he will say it again now: The record of these proceedings, from 2009 to the present, undermines the credibility of the American legal profession, which seems to be the end goal of this Zionist criminal enterprise.

Zionism and Nazism are coequal brands of insanity with one key distinction. They are both socialist, totalitarian movements that differ only as to the ethnic group who commands total control of the state. And they are both equally abhorrent to everything that makes this country a symbol of freedom and social progress.

The antisocial and antidemocratic outcomes below are obfuscating the fundamental distinction between the rule of law and rule by law, the latter of which is practiced by totalitarian governments. The United States of America is a constitutional, democratic republic of laws. The Zionists' proffered alternative is an authoritarian race to the bottom. If it does not end in our courts, then it will not end well.

Antonacci no longer wishes to be a Virginia lawyer, because the Virginia State Bar is no longer a legal institution. But Antonacci has the right to resign from the Virginia State Bar in good standing. Antonacci also seeks to avoid reciprocal discipline in other jurisdictions such as the District of Columbia, where his license has already been temporarily suspended as a result of this legal atrocity.

Respectfully submitted,

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*Petitioner and Counsel of Record*

## **APPENDIX**

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**VIRGINIA:**

***In the Supreme Court of Virginia  
held at the Supreme Court Building in the  
City of Richmond on Friday, the 21st day  
of November, 2025.***

LOUIS B. ANTONACCI,

against            Record No. 250925  
                         Circuit Court No. CL25000531-00

VIRGINIA STATE BAR EX REL.  
FOURTH DISTRICT, SECTION I COMMITTEE,

On September 30, 2025, came the appellant, who is self-represented, and filed a motion for extension of time in this case.

Upon consideration whereof, the Court denies the motion.

Upon consideration of the record received from the Circuit Court of the City of Alexandria on October 8, 2025, the Court finds that the appellant failed to timely file a notice of appeal with assignments of error and a transcript or written statement of facts. Rule 5:21(b)(2)(ii). Accordingly, the Court dismisses the appeal of right in this matter.

Justice Mann took no part in the resolution of this case.

App.2a

A Copy,

Muriel-Theresa Pitney, Clerk

Teste:

A handwritten signature in blue ink, appearing to be 'M. Pitney', written over a horizontal line.

Deputy Clerk

**VIRGINIA:**

***In the Supreme Court of Virginia  
held at the Supreme Court Building in the  
City of Richmond on Monday, the 8th day  
of September, 2025.***

LOUIS B. ANTONACCI,

against

Record No. 250106

RENU BRENNAN, ET AL.,

UPON A PETITION FOR WRITS OF  
PROHIBITION AND MANDAMUS

Upon consideration of the petition for writs of prohibition and mandamus filed February 7, 2025, the respondents' motion to dismiss, and the petitioner's reply, the Court is of the opinion that the motion should be granted and the petition should be dismissed.

Petitioner, an attorney, is the subject of certain disciplinary proceedings arising out of a complaint filed with the Virginia State Bar ("VSB") by petitioner's former client. After investigating the

Bar complaint, the VSB's Disciplinary Subcommittee determined petitioner violated Rules 1.9 and 3.1 of the Virginia Rules of Professional Conduct by using and disclosing confidential information gained during his representation of his former client against the client's interests in two lawsuits petitioner filed in federal court. Thereafter, petitioner elected to terminate the disciplinary proceeding before the VSB Disciplinary Board and demanded that further proceedings be conducted before a three-judge circuit court in accordance with Code § 54.1-3935.

The same day petitioner filed his demand for a three-judge circuit court, he filed the present petition against Renu Brennan, Bar Counsel to the VSB, and the VSB. Petitioner seeks a writ of mandamus directing the respondents to dismiss the Bar complaint against him. In addition, petitioner seeks a writ of prohibition (1) enjoining the respondents from filing any complaint under Rules 1.6 and 1.9 of the Virginia Rules of Professional Conduct because those Rules are unconstitutionally

vague; and (2) either permanently enjoining the respondents from bringing or filing a complaint against him related to the VSB disciplinary proceedings or temporarily enjoining such action until petitioner's federal lawsuit is fully adjudicated.

The Court holds prohibition does not lie as to Brennan because she is not a judicial actor or acting as a judicial or quasi-judicial body. *See* Va. Sup. Ct. R. pt. 6, § IV, ¶ 13-8(A)(1) (recognizing Bar Counsel may represent the VSB in pending matters and, in the course of performing such functions, “acts independently and exercises prosecutorial autonomy and discretion”).

The Court further holds prohibition does not lie as to the VSB. Prohibition is an extraordinary remedy that issues from a superior court to an inferior one to prevent the latter from acting on matters over which it lacks jurisdiction. *In re Vauter*, 292 Va. 761, 768 (2016). The VSB Disciplinary Board has jurisdiction to adjudicate and enforce attorney discipline matters. *See* Code §§ 54.1-3909, 54.1-1310, 54.1-3935; Va. Sup. Ct. R. pt. 6, § IV, ¶ 13-6(F).

Petitioner has failed to establish the VSB acted or will act without jurisdiction, and prohibition does not lie to prohibit the respondents from prosecuting further complaints filed with the VSB against petitioner.

The Court further holds mandamus does not lie. Mandamus is “an extraordinary remedy employed to compel a public official to perform a purely ministerial duty imposed upon him by law.” *Howell v. McAuliffe*, 292 Va. 320, 351 (2016) (internal quotation marks omitted). A ministerial act is one that a person “performs in obedience to a legal mandate and in a prescribed manner, without regard to his own judgment as to the propriety of the act to be done.” *Id.* (internal quotation marks omitted). The actions of a public official vested with discretion or judgment may not be compelled by mandamus. *Richlands Med. Ass’n v. Commonwealth*, 230 Va. 384, 386 (1985). “Where the official duty involves the necessity on the part of the officer to make some investigation, to examine evidence and form his judgment thereon, mandamus will not be awarded to compel performance of the

duty.” *Umstattd v. Centex Homes, G.P.*, 274 Va. 541, 546 (2007).

Investigation, presentation, and prosecution of complaints filed with the VSB involves the “exercise[] [of] prosecutorial autonomy and discretion.” Va. Sup. Ct. R., Part 6, § IV, ¶13-8(A)(1) (recognizing discretion vested in Bar Counsel). Thus, the writ of mandamus will not lie to compel the dismissal of the Bar complaint filed against petitioner.

Upon further consideration whereof, petitioner’s motion for leave to amend his petition is denied.

Accordingly, the petition is dismissed.

Justice Mann took no part in the resolution of this petition.

A Copy,

Teste:

Muriel-Theresa Pitney,  
Clerk

By:



Deputy Clerk

**VIRGINIA:  
IN THE CIRCUIT COURT FOR THE CITY OF  
ALEXANDRIA  
FILED SEPTEMBER 17, 2025**

**VIRGINIA STATE BAR,  
Complainant,**

**v.**

**LOUIS B. ANTONACCI,  
Respondent.**

**Case No.  
CL25000531**

**RESPONDENT'S NOTICE OF APPEAL**

Respondent Louis B. Antonacci hereby files this notice of appeal of this Court's June 30, 2025 orders finding misconduct and imposing sanctions. The transcript of the hearing will be filed with the Clerk. Respondent further avers that fraud perpetrated by both Assistant Bar Counsel and Judge Kimberly Irving prevented Antonacci's timely notice of the Court's June 30, 2025 Order. *See* attached Declaration of Louis B. Antonacci.

Signed by Louis B. Antonacci on September 17, 2025

**VIRGINIA:  
IN THE CIRCUIT COURT FOR THE CITY OF  
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**VIRGINIA STATE BAR,**

**Complainant,**

**v.**

**LOUIS B. ANTONACCI,**

**Respondent.**

**Case No.  
CL25000531**

**DECLARATION OF LOUIS B. ANTONACCI**

I, Louis Bernardo Antonacci, under penalty of perjury,  
declare as follows:

1. I am over 18 years old and I am competent to  
testify to the facts and matters set forth in this  
Affidavit. I have personal knowledge of the facts set  
forth in this Affidavit and, when called to testify, will  
competently testify to these facts.

2. My hearing in the above-captioned matter took place on June 11, 2025.

3. On June 24, 2025, I asked the “Chief Judge” of my panel, Kimberly Irving, to issue its memorandum order.

4. On June 25, 2025, Assistant Bar Counsel, Richard Johnson, sent Judge Irving a memorandum order that falsely indicated I had “waived” my objections to that order.

5. On June 26, 2025, I responded to Mr. Johnson and Judge Irving, indicating that I objected to the memorandum order.

6. Later on June 26, 2025, I followed up with Judge Irving about the status of the panel’s memorandum order.

7. On August 26, 2025, I followed up with Judge Irving about the status of the panel’s memorandum order.

8. On August 27, 2025, the Clerk of the Virginia State Bar responded to my August 26, 2025 email to Judge Irving my stating that she had called Alexandria Circuit Court and they had entered Judge Irving's order, drafted by Mr. Johnson, on June 30, 2025. That order falsely indicates that I waived my objections to that order.

9. I never received notice of the June 30, 2025 order until August 27, 2025.

10. Judicial Chambers at Prince William County Circuit Court, where Kimberly Irving is a judge, had previously sent me orders and hearing instructions issued by Judge Irving. They nonetheless failed to provide me with the June 30, 2025 order.

11. Mr. Johnson was aware that the panel had issued its memorandum order, and that it was entered by Alexandria Circuit Court, but failed to provide me with that order.

12. Judge Irving and Mr. Johnson deliberately caused to be entered an order that falsely claimed I waived my objection to it in order to deprive me of due process of law.

13. Judge Irving, Mr. Johnson, and the Virginia State Bar have willfully deprived Antonacci of due process of law in retaliation for his protected speech against the corrupt democratic politics and the Zionist criminal enterprise alleged in the federal complaint at issue in the above-captioned proceedings.

14. True and correct copies of correspondence with Judge Irving and Virginia State Bar are attached hereto as Exhibit A.

15. Pursuant to Va. Code §8.01-4.3, I declare under penalty of perjury that the foregoing is true and correct.

**FURTHER AFFIANT SAYETH NAUGHT.**

Sworn by Louis B. Antonacci on September 17, 2025

**VIRGINIA:  
IN THE CIRCUIT COURT FOR THE CITY OF  
ALEXANDRIA**

**VIRGINIA STATE BAR,**

**Complainant,**

**v.**

**LOUIS B. ANTONACCI,**

**Respondent.**

**FILED SEPT. 29, 2025**

**Case No.  
CL25000531**

**NOTICE OF FILING**

TO: Richard W. Johnson, Jr. (VSB No. 51024)  
Assistant Bar Counsel  
Virginia State Bar  
1111 E. Main Street, Suite 2700  
Richmond, VA 23219-0026  
Phone: (804) 775-0561  
E-mail: rjohnson@vsb.org

**PLEASE TAKE NOTICE** that on September 29, 2025 the undersigned electronically filed with the Clerk of the Circuit Court the transcript of the June 11, 2025 hearing in the above-captioned matter, a true and correct copy of which is attached hereto and hereby served upon you.

Signed by Louis B. Antonacci on September 29, 2025

VIRGINIA:

*Before the Virginia State Bar Disciplinary Board*

In re: Louis Bernardo Antonacci

This action came before the Disciplinary Board ("Board") on Petitioner Louis Bernardo Antonacci's Application for Resignation of his license to practice law in this Commonwealth, on June 13, 2025, with written objections having been filed by Bar Counsel, and later withdrawn on August 19, 2025, and the papers previously filed herein.

The Board is the body of the Virginia State Bar that is required by the *Rules of the Virginia Supreme Court* to review and formally accept all Applications for Resignation.

The Board, having considered the Application for Resignation accepts, without hearing, the petitioner's resignation as an active member not in good standing with the Virginia State Bar, in accordance with Paragraph 13-27.B of Part 6, Section IV of the *Rules of the Virginia Supreme Court*.

Upon consideration whereof, it is ORDERED that the name of Louis Bernardo Antonacci

be and hereby is, removed from the Roll of Attorneys of this Commonwealth, effective upon entry of this Order.

Order Entered this 3rd Day of September, 2025  
By Adam M. Carroll, Second Vice Chair  
The Virginia Disciplinary Board