

IN THE SUPREME COURT OF FLORIDA

THE FLORIDA BAR,

Petitioner,

v.

ASHLEY ANN KRAPACS,

Respondent.

Supreme Court Case  
No. SC-

The Florida Bar File Nos.  
2018-50,829(17I)FES  
2018-50,851(17I)  
2019-50,081(17I)

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**THE FLORIDA BAR'S PETITION FOR EMERGENCY SUSPENSION**

This petition of The Florida Bar seeks emergency relief and requires the immediate attention of the Court pursuant to R. Regulating Fla. Bar 3-5.2. The Florida Bar seeks the emergency suspension of **Ashley Ann Krapacs**, Attorney No. 122407, from the practice of law in Florida based on facts that establish clearly and convincingly that **Ashley Ann Krapacs** appears to be causing great public harm as will be shown by facts supported by the affidavits of attorneys Russell J. Williams and Nisha Bacchus, as well as multiple other exhibits, as follows:

1. The filing of this Petition for Emergency Suspension has been authorized by the Executive Director of The Florida Bar.
2. Respondent, **Ashley Ann Krapacs**, is and at all times hereinafter mentioned, was a member of The Florida Bar admitted on April 25, 2016, and subject to the jurisdiction and disciplinary rules of the Supreme Court of Florida.

3. Respondent is currently the subject of Bar disciplinary matters which have been assigned The Florida Bar file numbers 2018-50,829(17I)FES; 2018-50,851(17I); and 2019-50,081(17I).

4. The affidavits of attorneys Russell J. Williams and Nisha Bacchus, attached hereto as **The Florida Bar's Exhibits A and B**, are used by the Bar to support this Petition for Emergency Suspension.

5. Respondent has targeted these two members of The Florida Bar with a variety of vicious social media online continuous attacks and other conduct as a result of their representation of clients in litigation against this Respondent.

6. This petition has been filed as a result of the escalation of Respondent's misconduct, which resulted in attorney Bacchus filing and obtaining a Temporary Injunction for Protection Against Stalking, as well as a police report, and attorney Williams filing a lawsuit for Libel, Slander, Malicious Prosecution and Injunctive Relief.<sup>1</sup> (The Petition for Injunction for Protection Against Stalking, the temporary injunction, the Order, and the Supplemental Affidavit in Support of Petition for Injunction for Protection Against Stalking are attached hereto as **The Florida Bar's Composite Exhibit C**. The police report is attached hereto as **The**

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<sup>1</sup> The Bar is not concerned with the outcome of these proceedings, but rather that the Respondent's conduct has caused two members of The Florida Bar to seek extraordinary relief. The Bar would note, however, that on February 1, 2019, Ms. Bacchus' Request for a Permanent Injunction was granted by the Honorable Stephanie Moon, Broward Circuit Court Judge.

**Florida Bar’s Exhibit D.** The lawsuit is attached hereto as **The Florida Bar’s Exhibit E.)**

7. The Florida Bar maintains that Respondent’s actions, as set forth below, strike at the heart of conduct prejudicial to the administration of justice since the Respondent’s attacks are solely because attorneys Williams and Bacchus represent or represented individuals adverse to the Respondent. Rather than properly utilizing the court system, Respondent has launched an attack of massive and continuous proportions under Respondent’s misguided belief that the First Amendment shields her from scrutiny and prosecution by The Florida Bar for egregious misconduct.

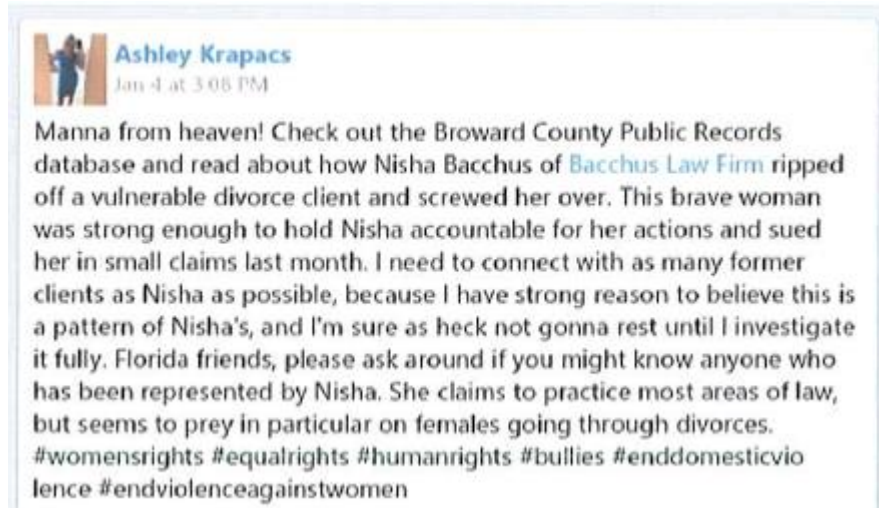
The First Amendment does not protect those who make harassing or threatening remarks about the judiciary or opposing counsel. *See Florida Bar v. Wasserman*, 675 So.2d 103, 104-05 (Fla. 1996). Under Rule of Professional Conduct 4-8.4(d), lawyers are required to refrain from knowingly disparaging or humiliating other lawyers. *See Florida Bar v. Uhrig*, 666 So.2d 887, 888 (Fla.1996).

The Florida Bar v. Sayler, 721 So.2d 1152 (Fla. 1998)

8. Additionally, rather than utilize the court system in a proper manner to advocate a position, Respondent has elected to engage in unilateral uncivilized public attacks. It is always feared that “engaging” with someone who spews venom will exacerbate the attacks. As such, the subjects of the attacks are, in

reality, unable to defend themselves. On the other hand, both Mr. Williams and Ms. Bacchus have elected to properly utilize the court system with litigation and a restraining order against the Respondent.

9. Respondent recently and astonishingly admitted and publicly broadcast her intention to “connect” with Ms. Bacchus’ former clients and has sent out a public cry for others to assist her with the below post dated January 4, 2019. All actions of Respondent are in furtherance of her goal to destroy Ms. Bacchus.



Respondent confirmed her intentions in an e-mail to The Florida Bar on January 21, 2019 in which she stated, in pertinent part:

I will be filing a formal bar complaint against Nisha based on the inaccuracies in the injunction petition and the fact that it's clear she filed the case merely to gain leverage in the civil defamation case. Further, I'll be representing several of her former clients in various bar complaints and potential malpractice cases.

(The January 21, 2019 e-mail is attached hereto as **The Florida Bar's Exhibit F.**)

Clearly, Respondent's fury has no bounds with her bold promise of retaliation against Nisha Bacchus. In fact, Respondent, on January 23, 2019, true to her word, forwarded a letter of representation in a Bar grievance filed by a former client of Ms. Bacchus, with the following:

I have accepted this case pro bono, meaning there will be no cost to you for my legal services.

(See **The Florida Bar's Composite Exhibit C**, which contains Nisha Bacchus' Supplemental Affidavit in Support of Petition for Injunction for Protection Against Stalking. Within that document, identified as Composite Exhibit B, is Ms. Krapacs' January 23, 2019 Client Engagement Letter for Judith Mach.)

The Bar would point out that under any other circumstance an attorney's handling of a matter on a pro bono basis is admirable and greatly encouraged. In this instance, the inescapable conclusion is that this Respondent's motivation is simply to hurt and damage Ms. Bacchus.

10. The Bar, and in strong agreement with this Court's harsh view of incivility, deems this Respondent's conduct to have exceeded any yet known

boundaries.<sup>2</sup> By waging a personal and public war on social media against attorneys representing clients, Ms. Krapacs has resorted to terrorist legal tactics. The practice of law, for attorneys Williams and Bacchus, should not subject them to guerilla warfare, and such behavior is the essence of conduct prejudicial to the administration of justice and great public harm. Additionally, Respondent's outrageous conduct only serves to perpetuate the public's perception that lawyers are uncivilized.

11. The salient facts are set forth below:

a. Krapacs was in a personal relationship with Gregory Knoop, a non-lawyer and resident of Texas. Krapacs moved to Florida.

b. In or about January 30, 2018, after Krapacs moved to Florida, she initiated a Petition for Domestic Violence Injunction against Knoop in Broward County, Florida, which resulted in a temporary injunction. Krapacs alleged that Knoop had previously abused her and was in fear of future abuse.

c. Attorney Russell J. Williams represented Knoop in proceedings held before the Honorable Michael G. Kaplan, Broward Circuit Court Judge.

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<sup>2</sup> Bar Counsel is intimately familiar with the Court's view of incivility as being the Bar attorney who handled matters related to Jeffrey Norkin. The Florida Bar v. Norkin, 132 So.3d 77 (Fla. 2013). The Florida Bar v. Norkin, 183 So.3d 1018 (Fla. 2018).

d. In or about July 24, 2018, the petition was dismissed by Krapacs.

e. Beginning on or about March 1, 2018, during and after the pendency of the petition, Krapacs began a social media blitz on Facebook, Instagram, LinkedIn, and by posting YouTube videos attacking and disparaging Williams and Judge Kaplan and insinuating a corrupt influence.

1) On or about March 1, 2018, Respondent posted on LinkedIn and stated, in pertinent part, with emphasis supplied:

- So, Russell J. Williams, ESQ sends me a letter threatening to FILE A MOTION FOR SANCTIONS AGAINST ME if I don't dismiss the domestic violence case within 21 days.
- **Old White Male Attorney #2** steps up to the plate to harass a domestic violence victim with yet another baseless legal treat. Classy.

(The above March 1, 2018 post is attached hereto as **The Florida Bar's Exhibit G.**)

2) On or about April 14, 2018, Respondent posted on LinkedIn and stated, in pertinent part, with emphasis supplied:

- **Oh, and opposing counsel blatantly, flat-out LIED on the record. The judge didn't bat an eye.**
- So I had to start all over again. I filed a new petition yesterday. I'm documenting the date, time, and name of every courthouse employee I speak with.

**Something is really off here.** #metoo #timesup  
#domesticviolence #womensrights #keepfighting

- I've been inspired—and pissed off—by my bully ex-boyfriend and **his bully attorneys and their aggressive and intimidating legal tactics** after I confronted my ex about his past abuse of me.

(The above April 14, 2018 post is attached hereto as **The**

**Florida Bar's Exhibit H.)**

Each of these statements begins by identifying Ashley Krapacs as Esq. and Owner at Ashley Ann Krapacs, PLLC and some conclude by identifying Ms. Krapacs as a Sexual Harassment Lawyer.

3) On or about April 21, 2018, Respondent posted on Facebook and stated, with emphasis supplied:

- Today, I got a recording of my hearing from last week. **I knew that how I had been treated, by opposing counsel and the judge, was bad, but DAMN.** All I can say is, I've always wanted to write a book. And, well, this book is writing itself. #metoo #timesup #nomore #endsexism #holymisogyny #lawyerlife #keepfighting #justicewillprevail

(The above April 21, 2018 post is attached hereto as **The**

**Florida Bar's Exhibit I.** A copy of the transcript of the hearing dated April 12, 2018, to which Respondent referred in the above post, is attached hereto as **The Florida Bar's Exhibit J.)**

It is crystal clear that Judge Kaplan treated the Respondent with utmost dignity, courtesy and patience. Likewise, there was absolutely nothing concerning Mr. Williams' conduct warranting Respondent's public disparagement of both as treating Respondent badly.

4) Respondent, through her law firm, wrote an article which she posted on a blog entitled, "When You Don't Let Female Lawyers Talk, We'll Only Get Louder." (The April 23, 2018 article is attached hereto as **The Florida Bar's Exhibit K.**) The article, in good part, refers to the hearing held on April 12, 2018. (See **The Florida Bar's Exhibit J.**)

- Krapacs referred to Judge Kaplan and attorney Williams as "old white males."
- Krapacs accused the court of subtle bias, as clear as day.
- Krapacs claimed that an egregious exchange occurred.
- Krapacs stated that the court did not provide a valid explanation for why opposing counsel's motion was heard and Krapacs' motion was not.

\* \* \*

Respondent's statements are deceitful and derogatory and with the intention of falsely portraying that she had been mistreated in court on April 12, 2018. A review of the transcript attached as **The Florida Bar's Exhibit J**, beginning at page 17 describes the events that actually occurred. Respondent filed a motion to amend without

seeking leave from the court and without setting the matter for hearing. The court patiently explained the procedure to the Respondent, who apologized for her lack of knowledge:

THE COURT: We're just going to address the petition that you filed. And I understand that there may be further proceedings depending on the ruling of the Court today, but we're going to be limited to that.

MS. KRAPACS: Sure. And I apologize, Your Honor, I did do a clerkship in D.C. Superior Court and the process that we followed that often motions that were filed in between hearing were done in chambers, and so I wasn't aware and I asked the clerks and they said - -

THE COURT: That's fine. You don't have to explain any further. That's okay.

- Respondent accused attorney Williams of lying in the hearing in this blog as well as in multiple other public posts based on the following actual exchange:

MS. KRAPACS: I'm sorry, did you just say - -

THE COURT: I understand.

MS. KRAPACS: I'm sorry, did opposing counsel say he never received that?

THE COURT: Well, the answer was - -

MR. WILLIAMS: I know it's been filed. I went to the clerk's office to obtain a copy. They would not give it to me because they would not, because I'm not attorney of record.

MS. KRAPACS: I'd like to confirm for the record I emailed it to - -

THE COURT: One moment. Don't interrupt, please. Go ahead.

MR. WILLIAMS: I never got - - I got the motion to amend. Yes, the petitioner is right, I did get the motion to amend. She did email it to me.

(See **The Florida Bar's Exhibit J, page 25.**)

- It is outrageous that Respondent paints Mr. Williams as a liar based on this exchange.
- Respondent continued to disparage Judge Kaplan and Mr. Williams when she stated the following:

The Old Boy's Club is alive and well in 2018. I don't think the judge who tried to silence me is a bad man. He likely would say and probably believes that he is not biased or sexist. However, his treatment of me proves otherwise. We wouldn't have even been in that hearing if he had acknowledged and acted on my motion for leave to amend the petition.

- Respondent has accused the court of bias and membership in the "Old Boy's Club" when she herself acknowledged her own lack of competence and knowledge of procedure leading to her apology.

5) On or about May 10, 2018, Respondent, through her law firm, posted an article which she wrote entitled, "Bad Attorney Behavior: If You See It, Report It." (The May 10, 2018 article is attached hereto as **The Florida Bar's Exhibit L.**) Respondent stated the following, in pertinent part:

- Mr. Williams then proceeded to lie on the record numerous times during the one hearing that was held in the case on April 12, 2018.

- Boo hoo. He knows that truth is an absolute defense to defamation and that he can't do a damn thing about me calling him out for lying.
- This man has been practicing for over 30 years. I cannot fathom how many female domestic violence victims and opposing counsel have been sandbagged and railroaded by this bully.

\* \* \*

Much of this article publicly addresses the Bar grievance that Ms. Krapacs filed against Mr. Williams, which was summarily dismissed by the Bar.

f. Due to Respondent's unrelenting public social media attacks, on July 26, 2018, attorney Williams filed a lawsuit against Ms. Krapacs for Libel, Slander, Malicious Prosecution and Injunctive Relief. Attorney Nisha Bacchus represents Mr. Williams. (See **The Florida Bar's Exhibit E.**)

1) In addition to the other disparaging attacks, Respondent posted YouTube videos and launched additional assaults.

a. A transcript of a YouTube video of Respondent, which she posted on or about July 31, 2018 after receipt of the lawsuit, is attached hereto as **The Florida Bar's Exhibit M.** In it, Respondent stated, in pertinent part:

- I have been laughing a lot. I can't stop laughing since I read this complaint that has been filed against me on me [sic] behalf of Russell J. Williams. This complaint [indicating]. Russell

J. Williams of Williams, Hilal, Wigand, Grande Law Firm. (Page 3)

- Twenty-five pages of garbage, lies, fake news...riddled with lies and other nontruths...obscene. (Page 4)
- ...lying on the record is just what Mr. Williams does best...I have the court recording and the official court transcript of that hearing that confirms his lies. (Page 4)
- More lies. This guy just - - he cannot get enough of lying in formal proceedings. I mean, man, like, it's just, it's a lie. (Page 6)
- ...he also whines that I call him a moron and a sexist and a bully. Well, sorry - - I'm not sorry, but you are all of those things. (Page 6)
- Um, you know, and there is - - there is another option here. There is a really easy option. You could, you know, just stop being a dick. Like, that's a really simple solution, just don't be a dick. Um, but men like Russell J. Williams want to have their cake and eat it too. Listen, when you have been having your cake and eating it too for three decades and it worked and it has made you a lot of money, I guess it would piss you off when someone comes along and makes it clear that that just isn't going to work anymore.

You know, it pisses him off that he can't just keep acting a fool and then pretending to be a good guy. He wants to act like a baby, bully people around, lie and cheat his way through cases and then pretend like he's a decent human being. Sorry, that's just not an option anymore. It's just not. (Pages 7-8)

- If you want to take cases where you're going after a domestic violence survivor in a completely frivolous bullshit lawsuit, you cannot also claim to support women's rights. You just can't. I mean, you can do whatever you want, but the math just doesn't add up. And I'm going to call you out. So, Nisha Bacchus, you're a backstabbing traitor. I almost feel bad for you, almost. Almost. Because he's playing her. He is playing her like a fucking fiddle. He knew he was going to have a hard time finding any attorney who was actually going to file this piece of garbage. He knew it. So what did he do? He found someone desperate for work, someone so hard up for cases that she would do anything for a quick buck. And this much is obvious to me. It's really clear from her website.

For one thing, she uses "our firm", "our" this, "our" that, all throughout the website. And you can - - I mean, it's just one lawyer since, what I can tell, 2011. So it is seven years and you haven't been able to - - you have been using a plural pronoun but haven't been able to bring another lawyer on board. Like, "our". Okay. You and your paralegal. Um, so it is obvious from her website.

She also claims to have multiple departments of her law firm and she's the self-designated head of all these departments. I guess the competition wasn't really steep. Um, but, congrats.

Also, she's a door lawyer. Which is basically a lawyer who takes anything that walks in the door in any area of law.  
(Pages 10-11)

- Because you can't do every area of law and do them all well. You just can't. Some people try and they end up like Nisha Bacchus who are so hard up that they'll take anything, including shit like this. So I almost feel bad for her because he's playing her. It is really obvious from the way that she presents herself that she'll take anything if the price is right. Or even if it's not. (Page 12)
- So I almost feel bad for her but not quite. At the end of the day no matter how convincing and manipulative he is, it is still her choice to represent him and it's a choice that she'll live with for the rest of her life. Um, the choice to file this utter bullshit complaint. The choice to go after a rape survivor when you claim to be pro women's rights. Are you fucking kidding me? The choice to sell out to make a quick buck. It's her choice. Her actions have spoken volumes about the kind of person she really is. And that is a woman who does not like women very much. So, sorry, honey, you're exposed. (Pages 13-14)
- Everyone has a price and Russell J. Williams figured out Nisha's. But, girl, it's going to cost you. It's going to cost you, girl. You made your bed, so lay in it. Hope you're comfortable. (Page 15)
- So you get to choose your branding. And your choice of branding is representing misogynist pigs, misogynist bullies like Russell J. Williams, that's not good branding. (Page 16)

2) Although Respondent continued to attack Mr. Williams,

her focus, in good part, shifted to Nisha Bacchus, who represents Mr.

Williams. Respondent launched a cyberstalking attack which “tagged”<sup>3</sup> Ms. Bacchus personally, as well as her law firm.

a. July 31, 2018 Facebook and Instagram posts:

- Nisha Elizabeth Bacchus. Damn, girl. You must be hard up for new cases to take on a piece of garbage like Russell J. Williams. And you promote yourself as being “pro-women’s rights.” How do you sleep at night? #sellout #womanhater #metoo #timesup #endrapeculture #endsexism #endmisogyny

(The above July 31, 2018 post is attached hereto as **The**

**Florida Bar’s Exhibit N.)**

- Ashley Ann Krapacs, PLLC

Ya’ll, social media is no joke. You want to act a fool and be a jerk to people? Go right ahead. But don’t expect people not to call you out for it. I’m talking to you, **Nisha Elizabeth Bacchus**. The choices you make in life form what becomes your personal brand. What do your choices say about you? #beempowered #metoo #timesup #womensrights #humanrights #domesticviolence #calledout #exposed #notafraid #sellout #traitor #endsexism #endmisogyny

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<sup>3</sup> Tags allow social media users to engage an individual, business or any entity with a social profile when they mention them in a post or comment. In Facebook and Instagram, tagging notifies the recipient and hyperlinks to the tagged profile. Here Ms. Krapacs’ obvious motivation was to make certain that Ms. Bacchus knew the threats and insults being launched by Ms. Krapacs. This behavior caused Ms. Bacchus tremendous upset and distress. (See **The Florida Bar’s Exhibit B.**)

(The above July 31, 2018 post is attached hereto as **The Florida Bar's Exhibit O.**)

- Ashley Ann Krapacs, Esq.

Russell J. Williams, partner at  
@WHWG\_LAW, sued me for  
#defamation. Way to harass a survivor of  
#domesticviolence and #rape, you pig!  
Oh, and #TRUTH is an absolute defense  
to defamation, moron, so good luck with  
that. Smfh. #metoo #timesup #frivolous  
#vindictive #bully

(The above July 31, 2018 post is attached hereto as **The Florida Bar's Exhibit P.**)

b. On or about August 8, 2018, Respondent posted a blog about Ms. Bacchus and her firm on Respondent's firm's website utilizing Ms. Bacchus' photo. This post also continued to disparage Mr. Williams and Judge Kaplan. Those parts pertinent to Nisha Bacchus are set forth below:

- So I'm admittedly disheartened to learn that a female has joined that fight. But again, everyone can be bought.
- The defamation suit is intended only to harass and intimidate me. Mr. Williams knows it. And so does Nisha Bacchus. But she sold out anyway. She's helping a hateful bully continue to torment me. She's helping a sexist pig continue to psychologically torture me. It's gotta

be a painful existence to live as a woman and also hate women so much at the very same time.

- The website of Nisha Bacchus tells me everything I need to know about this woman: she's thirsty for work. So hard up, she'll engage with a scumbag like Russell J. Williams. It's pathetic, really.
- What a fraud. She pretends to care about women. She pretends to support women's rights issues. She pretends to care about women who have been abused.
- In a lot of ways, Nisha Bacchus is just like Russell J. Williams: a bully who wants to act like an asshole, but then pretend like she's something she's not, and just try to avoid she getting called out for who she really is. Well, sorry, sweetie, but you can't have it both ways. If you want to take clients like Russell J. Williams, you can't also claim to support women's rights and the #metoo movement. That math just doesn't add up. And I will call you out and scream it from the rooftops: Nisha Bacchus is nothing more than insecure, hateful, jealous woman who hates women.

See you in court, asshole.

(The above August 8, 2018 post is attached hereto as **The Florida Bar's Exhibit Q.**)

c. On or about October 6, 2018, Respondent posted a photo of protestors in front of the U.S. Supreme Court and stated the following, in pertinent part:

- My body is mine. My life matters. My story matters. And FUCK anyone who says it doesn't.

Fuck Gregory Knoop.

Fuck Russell J. Williams.

Fuck Williams Hilal Wigand Grande law firm.

Fuck Nisha Bacchus.

Fuck Bacchus Law.

Fuck David Benowitz.

Fuck Seth Price.

Fuck Price Benowitz law firm.

Fuck Kevin Tynan.

Fuck James Drakeley.

Fuck Kenneth Patterson.

Fuck Hiersche, Hayward, Drakeley & Urbach law firm.

Fuck everyone who perpetuates #rapeculture. Fuck everyone who perpetuates #misogyny. Fuck everyone who perpetuates violence against women.

You might get Kavanaugh. But you've waged a war that you cannot win. #Progress is coming whether you like it or not. And you will be held accountable. I will never stop fighting. #metoo #timesup

(See **The Florida Bar's Composite Exhibit C**, which contains Nisha Bacchus' Supplemental Affidavit in Support of

Petition for Injunction for Protection Against Stalking. Within that document, identified as Composite Exhibit D, is the post containing the profanities.)<sup>4</sup>

d. On or about October 22, 2018, Respondent posted on Facebook and stated, in pertinent part:

- ...she filed several things and provided me with absolutely no notice, even though I'm listed in the court's e-service system. No idea where this lunatic went to law school, but it must have been a school that doesn't put a whole lot of emphasis on, ya know, THE LAW, and just basic due process. Smfh. #metoo #timesup #bullies #amateurhour #womensrights #equalrights #endviolenceagainstwomen #endrapeculture #endthepatriarchy

(The above October 22, 2018 post is attached hereto as

**The Florida Bar's Exhibit R.)**

e. On October 25, 2018, Respondent posted a photograph from a film in which a shotgun is pointed at the perpetrator. This post terrified Ms. Bacchus because of its violent nature and was a basis for her seeking an injunction for stalking. (See **The Florida Bar's Composite Exhibit C.**)

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<sup>4</sup> The Florida Supreme Court Oath of Admission, which highlights civility, states that members of the Bar shall "abstain from offensive personality."

when opposing counsel tries to use  
the same exact trick you saw in  
your last case



f. On or about October 25, 2018, Respondent posted a statement to Facebook accusing The Florida Bar, the court and the State Attorney's Office of being corruptly influenced by Nisha Bacchus. She stated, in pertinent part:

- She's already tried using her personal connections at the Florida Bar to silence me. Didn't work. She tried using her connections at the court to silence me. Didn't work. She and her client, Russell J. Williams of **Williams, Hilal, Wigand & Grande, PLLC.** law firm, even threatened to use personal connections at the states attorney office to have me arrested.

Even then, I refused to be silenced. This lady is OUT OF CONTROL. Nothing but an evil bully. Bring it, diva. NOTHING they can do to me is going to silence me from speaking the truth about what people like Nisha Bacchus and Russell J. Williams do to vulnerable #sexualassaultsurvivors. #metoo #timesup #womenrights #believesurvivors #humanrights #enoughisenough

(The above October 25, 2018 post is attached hereto as

**The Florida Bar’s Exhibit S.)**

g. On or about October 26, 2018, Respondent posted a statement to Facebook again accusing The Florida Bar of being corruptly influenced by Nisha Bacchus. Respondent expressing these accusations publicly in the guise of “an opinion” does not protect Respondent from both the scrutiny and sanction of this Court and the Bar. She stated, in pertinent part:

- I heard from the Florida bar today regarding the multiple ethics complaints that have been filed against me by Russell J. Williams (partner at Williams, Hilal, Wigand & Grande, PLLC. Law firm) and my ex, Gregory Knoop. Given the timing of the email and that I hadn’t heard anything from them at all for weeks, I have to assume that it’s not a coincidence. It is solely my opinion, but I have to believe Nisha is behind it.

- And then he [sic] fact that there's obviously a LOT going on behind the scenes that I'm not privy to is incredibly upsetting. This is ya world we live in. It's 2018, and young female attorneys are held to an entirely different standard than the Old White Males. It may cost me my bar license to keep writing publicly about the state of this field, but I don't feel I have any other choice.

(The above October 26, 2018 post is attached hereto as

**The Florida Bar's Exhibit T.)**

h. On or about November 29, 2018, Respondent posted a statement to Facebook with regard to the pending defamation lawsuit. She stated, in pertinent part:

- As long as the litigation continues, I look forward to embarrassing both of these bullies as I lay the paper trail that clearly demonstrates what side of history these two attorneys are on. And hint: it's not the good side!

(The above November 29, 2018 post is attached hereto as

**The Florida Bar's Exhibit U.)**

i. On or about December 5, 2018, Respondent posted a statement to Facebook which gave a glimpse of her intentions with regard to further harming Ms. Bacchus.

- ...and this week, I got some unsavory information about Nisha Bacchus that is a total game changer. Stay tuned for that.

(The above December 5, 2018 post is attached hereto as

**The Florida Bar's Exhibit V.)**

j. On or about December 19, 2018, Respondent posted a statement to Facebook attacking Ms. Bacchus' filing of a Request to Produce, in her representation of Mr. Williams. Ms. Krapacs stated the following, in pertinent part, with emphasis supplied:

- These tactics do nothing but keep those who are powerless and vulnerable stuck, while they make greedy, evil people like Nisha Bacchus rich. (**How's that BMW treating you, baby?**)

(See **The Florida Bar's Composite Exhibit C**, which contains Nisha Bacchus' Supplemental Affidavit in Support of Petition Against Stalking. Within that document, identified as Composite Exhibit D, is Ms. Krapacs' December 19, 2018 post.)

This post again put Ms. Bacchus in physical fear since Ms. Krapacs publicly exposed the type of vehicle that Ms. Bacchus drives. In Ms. Bacchus' Petition for Temporary Injunction, she stated:

The December 19, 2018 posting was extremely alarming as Respondent made reference to the type of vehicle that I drive. I was terrified when I was alerted by this positing [sic] as I have never met Respondent, nor do we have any friends or colleagues in common with her. I reached out to her attorney, Patricia Acosta, Esq., who is representing Respondent in the civil matter and expressed my concerns via email. I do not know if Ms. Acosta ever addressed this matter with Respondent. This made me extremely uncomfortable and anxious. I reported this posting immediately to the Florida Bar.

(See **The Florida Bar's Composite Exhibit C.**)

12. On February 1, 2019, Judge Moon granted an indefinite Final Judgment of Injunction for Protection Against Stalking against Ashley Krapacs as a result of her actions toward Nisha Bacchus. (A copy of the court's order dated February 1, 2019 is attached hereto as **The Florida Bar's Exhibit W.**)

13. Within three hours of the conclusion of the hearing and issuance of the Injunction, Ms. Krapacs sent the following e-mail to Bar Counsel:

Received Fri 02/01/2019 4:05PM  
From Ashley Krapacs  
Subject DVCE 19-000341 Case Update  
To Sum, Alice; Casco, Maria; Lazarus, Randi  
cc  
bcc

Good Afternoon,

Today, Judge Moon issued a limited permanent injunction in the above-referenced case. My attorney has a copy of the order, and I will send it to you as soon as I receive a copy from her. I will be appealing the ruling as soon as I secure the right appellate lawyer.

Further, I have reason to believe that Ms. Bacchus not only abandoned her former client, Ms. Mach, in Ms. Mach's divorce case, I also have reason to believe that Ms. Bacchus unlawfully filed liens against Ms. Mach's property. I need to conduct further research before I can say definitively what kind of case Ms. Mach may have against Ms. Bacchus, but I will continue to provide updates as required. Please let me know if you have any questions.

Have a wonderful weekend.

Best,

Ashley

--

Regards,

Ashley Ann Krapacs  
New York Bar #5389309  
Florida Bar #122407  
District of Columbia Bar #1045497  
[ashley@krapacslaw.com](mailto:ashley@krapacslaw.com)  
[www.krapacslaw.com](http://www.krapacslaw.com)  
[Follow me on Facebook!](#)  
[Follow me on Twitter!](#)  
[Connect on LinkedIn!](#)

14. The e-mail establishes that Ms. Krapacs intends to continue with her attempts to crucify Ms. Bacchus. In fact, she again makes unsupported allegations to The Florida Bar of “unlawful” conduct by Ms. Bacchus before admittedly researching the issue.

Wherefore, by reason of the foregoing, Respondent is causing great public harm and has violated the following Rules Regulating The Florida Bar: 3-4.3 [The standards of professional conduct required of members of the bar are not limited to the observance of rules and avoidance of prohibited acts, and the enumeration of certain categories of misconduct as constituting grounds for discipline are not all-inclusive, nor is the failure to specify any particular act of misconduct to be construed as tolerance of the act of misconduct. The commission by a lawyer of any act that is unlawful or contrary to honesty and justice may constitute a cause for discipline whether the act is committed in the course of the lawyer's relations as a lawyer or otherwise, whether committed within Florida or outside the state of Florida, and whether the act is a felony or a misdemeanor.]; 4-4.4(a) [In representing a client, a lawyer may not use means that have no substantial purpose other than to embarrass, delay, or burden a third person or knowingly use methods of obtaining evidence that violate the legal rights of such a person.]; and 4-8.4(d) [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.].

WHEREFORE, based on the aforementioned facts and evidence, the Bar asserts the Respondent has caused, or is likely to cause, immediate and great harm to clients and/or the public and that immediate action must be taken for the protection of the Respondent's clients and the public. Therefore, pursuant to R. Regulating Fla. Bar 3-5.2, The Florida Bar respectfully requests this Court to:

A. Suspend Respondent from the practice of law until further order of this Court.

B. Order Respondent to accept no new clients from the date of this Court's order and to cease representing any clients after 30 days from the date of this Court's order. Within the 30 days from the date of this Court's order, Respondent shall wind down all pending matters and shall not initiate any litigation on behalf of clients. Respondent shall withdraw from all representation within 30 days from the date of this Court's order. In addition, Respondent shall cease acting as personal representative for any estate, as guardian for any ward, and as trustee for any trust and will withdraw from said representation within 30 days from the date of this Court's order and will immediately turn over to any successor the complete

financial records of any estate, guardianship or trust upon the successor's appointment.

C. Order Respondent to furnish a copy of the suspension order to all clients, opposing counsel, courts before which Ashley Ann Krapacs is counsel of record, and state, federal, or administrative bars of which Respondent is a member, as required by Rule 3-5.1(h) of the Rules of Discipline of The Florida Bar and to furnish Staff Counsel with the requisite affidavit listing all clients, opposing counsel, courts and state, federal or administrative bars so informed within 30 days after receipt of the Court's order.

D. Order Respondent to refrain from withdrawing or disbursing any money from any trust account related to Respondent's law practice until further order of this Court, a judicial referee appointed by this Court or by order of the Circuit Court in an inventory attorney proceeding instituted under R. Regulating Fla. Bar 1-3.8, and to deposit any fees, or other sums received in connection with the practice of law or in connection with the Respondent's employment as a personal representative, guardian or trustee, paid to the Respondent after issuance of this Court's order of emergency suspension, into a specified trust account from which withdrawal may only be made in accordance with restrictions imposed by this Court. Further,

Respondent shall be required to notify Bar Counsel of The Florida Bar of the receipt and location of said funds within 30 days of the order of emergency suspension.

E. Order Respondent to not withdraw any money from any trust account or other financial institution account related to Respondent's law practice or transfer any ownership of any real or personal property purchased in whole or in part with funds properly belonging to clients, probate estates for which Respondent served as personal representative, guardianship estates for which Respondent served as guardian, and trusts for which Respondent served as trustee without approval of this Court, a judicial referee appointed by this Court or by order of the Circuit Court in an inventory attorney proceeding instituted under R. Regulating Fla. Bar 1-3.8.

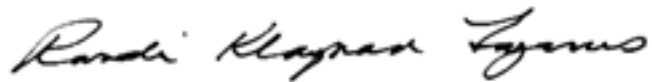
F. Order Respondent to notify, in writing, all banks and financial institutions where the Respondent maintains an account related to the practice of law, or related to services rendered as a personal representative of an estate, or related to services rendered as a guardian, or related to services rendered as a trustee, or where Respondent maintains an account that contains funds that originated from a probate estate for which Respondent was personal representative, guardianship estate for which respondent was guardian, or trust for which Respondent was trustee, of the provisions of this

Court's order and to provide all the aforementioned banks and financial institutions with a copy of this Court's order. Further, Respondent shall be required to provide Bar Counsel with an affidavit listing each bank or financial institution Respondent provided with a copy of said order.

G. Order Respondent to immediately comply with and provide all documents and testimony responsive to a subpoena from The Florida Bar for trust account records and any related documents necessary for completion of a trust account audit to be conducted by The Florida Bar.

H. And further to authorize any Referee appointed in these proceedings to determine entitlement to funds in any trust account(s) frozen as a result of an Order entered in this matter.

Respectfully submitted,

A handwritten signature in black ink, reading "Randi Klayman Lazarus". The signature is written in a cursive, flowing style.

Randi Klayman Lazarus, Bar Counsel  
The Florida Bar  
Ft. Lauderdale Branch Office  
Lake Shore Plaza II  
1300 Concord Terrace, Suite 130  
Sunrise, Florida 33323  
(954) 835-0233  
Florida Bar No. 360929  
[rlazarus@floridabar.org](mailto:rlazarus@floridabar.org)  
[mcasco@floridabar.org](mailto:mcasco@floridabar.org)

*Adria E. Quintela*

ADRIA E. QUINTELA  
Staff Counsel  
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Florida Bar No. 897000  
[aquintel@floridabar.org](mailto:aquintel@floridabar.org)

/s/ Joshua E. Doyle  
JOSHUA E. DOYLE  
Executive Director  
The Florida Bar  
651 East Jefferson Street  
Tallahassee, Florida 32399-2300  
(850) 561-5600  
Florida Bar No. 25902  
[jdoyle@floridabar.org](mailto:jdoyle@floridabar.org)

## **CERTIFICATE OF SERVICE**

I certify that this document has been E-filed with The Honorable John A. Tomasino, Clerk of the Supreme Court of Florida, with a copy provided via e-mail to Respondent, Ashley Ann Krapacs, at [krpacsaa@gmail.com](mailto:krpacsaa@gmail.com); and that a copy has been furnished by United States Mail via certified mail No. 7017 1070 0000 4774 1589, return receipt requested, to Respondent, Ashley Ann Krapacs, whose record Bar address is 401 East Las Olas Blvd., Suite 1400, Fort Lauderdale, FL 33301-2218; and via email to Randi Klayman Lazarus, Bar Counsel, at [rlazarus@floridabar.org](mailto:rlazarus@floridabar.org) and [mcasco@floridabar.org](mailto:mcasco@floridabar.org), on this 20th day of February, 2019.

*Adria E. Quintela*

ADRIA E. QUINTELA  
Staff Counsel  
The Florida Bar  
Lakeshore Plaza II, Suite 130  
1300 Concord Terrace  
Sunrise, Florida 33323  
(954) 835-0233  
Florida Bar No. 897000  
[aquintel@floridabar.org](mailto:aquintel@floridabar.org)

**NOTICE OF DESIGNATION OF PRIMARY AND SECONDARY E-MAIL  
ADDRESSES**

PLEASE TAKE NOTICE that Bar Counsel in this matter is Randi Klayman Lazarus, Bar Counsel, whose address, telephone number and primary and secondary e-mail addresses are The Florida Bar, Ft. Lauderdale Branch Office, Lake Shore Plaza II, 1300 Concord Terrace, Suite 130, Sunrise, Florida 33323, (954) 835-0233, [rlazarus@floridabar.org](mailto:rlazarus@floridabar.org) and [mcasco@floridabar.org](mailto:mcasco@floridabar.org). Respondent need not address pleadings, correspondence, etc. in this matter to anyone other than bar counsel and to Adria E. Quintela, Staff Counsel, The Florida Bar, Lakeshore Plaza II, 1300 Concord Terrace, Suite 130, Sunrise, Florida 33323, [aquintel@floridabar.org](mailto:aquintel@floridabar.org).

**MANDATORY ANSWER NOTICE**

RULE 3-5.2(a), RULES OF DISCIPLINE, EFFECTIVE JULY 1, 2012,  
2004, PROVIDES THAT A RESPONDENT SHALL ANSWER A COMPLAINT.

The Florida Bar's  
Exhibit A

**IN THE MATTER OF THE FLORIDA BAR**

**THE FLORIDA BAR,**

**Plaintiff**

**Vs.**

**ASHLEY KRAPACS,**

**Defendant,**

---

**AFFIDAVIT OF RUSSELL J. WILLIAMS, ESQ.**

1. My name is Russell J. Williams. I have been practicing law in the State of Florida since 1987.

2. In addition to practicing law I also teach Ethics in Criminal Justice, which is an online course offered College Level students at Nova University.

3. During the month of March, 2018 I was retained to represent Mr. Gregory Knoop in reference to a Domestic Violence injunction filed against him by Ms. Ashley Krapacs. The injunction was filed by Ms. Krapacs on or about February 12, 2018.

4. Since I did not believe Ms. Krapacs could obtain an injunction in the State of Florida, let alone Broward County, my initial representation was limited in scope. I filed a motion to dismiss the injunction for lack of jurisdiction.

5. Upon the filing of the motion to dismiss, Ms. Krapacs initially sent me an email. The email was sent after office hours. Before I had a chance to respond, Ms Krapacs sent me another email. I did not see this email until the following morning.

6. At the time both these emails were sent, I made a decision not to speak to Ms. Krapacs either in person, on the telephone or by email.

7. Ms. Krapacs was constantly bothered by the fact that I did not file a notice of appearance. However, based upon my belief that the court did not possess the requisite jurisdiction, I was appearing in a limited capacity only. My appearance was only to address the jurisdictional issue.

8. On or about April 12, 2018, Judge Michael Kaplan held a hearing on the motion to dismiss. He granted the motion to dismiss. The following day, April 13, 2018, Ms. Krapacs filed an amended petition for injunction. It elaborated on the factual issues

between Ms. Krapacs and Mr. Knoop. However, it still failed to address the jurisdictional issue.

9. As a result of the amended petition for injunction, I refiled another motion to dismiss essentially asserting the same points I argued in the previous motion to dismiss. A hearing was scheduled for May 23, 2018.

10. Between April 13, 2018 and May 23, 2018, Ms. Krapacs filed a frivolous bar complaint against me. She also filed an appeal of her motion to disqualify Judge Kaplan to the Fourth District Court of Appeal.

11. On or about April 16, 2018 Ms. Krapacs started commenting about her case on various social media websites. In these postings she began talking disparagingly about me.

12. On or about May 10, 2018 I responded to the frivolous bar complaint. On this date Ms. Krapacs posted an article on an "Be Empowered Blog". In this blog, which was seen by numerous friends and colleagues inside and out of the courthouse, she posted my response to the bar complaint. She also called me a liar, sexist, bully, and an entitled white male.

13. In this particular posting, she referenced my firm, as well as me individually. By doing this she was sure to have these sites linked to our independent social media sites.

14. On May 23, 2018, Ms. Krapacs voluntarily dismissed the amended petition for injunction. The court subsequently denied my motion for sanctions.

15. Ms. Krapacs has continuously posted humiliating, disparaging and defamatory statements about me on all social media websites. These sites include, but are not limited to: Instagram, Facebook; and Twitter.

16. Ms. Krapacs has also posted a series of video blogs on YouTube where she continues to maliciously disparage, harass, defame and ridicule me. This has caused substantial emotional distress to not only me but my partners as well

17. These false publications have been linked to all my websites on social media. They have caused damage to my business relations as well as reputation.

18. To date I have never had an actual conversation, either on the phone or in person, with Ashley Krapacs. I have never had any email communications with Ashley Krapacs other than to send her a pleading or advise of a hearing date.

19. By July, 2018, after countless number of social postings, I filed a civil complaint against Ms. Krapacs for injunctive relief, slander per se; libel per se and malicious prosecution for filing a frivolous bar complaint.

20. Ms. Krapacs has also launched a social media tirade against the lawyer that is representing me in the civil action, Nisha Bacchus. These postings have become so

severe that Ms. Bacchus has filed a cyberstalking injunction. A temporary injunction was granted and a hearing was scheduled for January 23, 2019 at 10:00 a.m. A hearing on the evidentiary portion of the injunction is now scheduled for February 1, 2019 at 10:30 a.m.

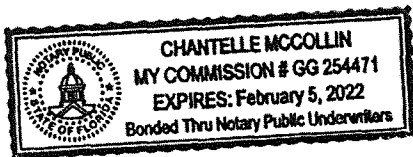
21. I do not know Ms. Krapacs personally. In fact, other than seeing her in court on several occasions, I have never met her. These postings are a result of my representation of a client, specifically Mr. Knoop. Ms. Krapacs clearly is engaging in conduct that is prejudicial to the administration of justice.

22. The conduct exhibited by Ms. Krapacs, who is a member of the Florida Bar, needs to be addressed immediately. Her behavior had been constant, continuous, and never stops.

**BEFORE ME**, the undersigned authority, personally appeared, Russell J. Williams, who after being duly sworn upon under oath, and who is personally known to me, deposes and says that he executed the foregoing affidavit for the purposes therein expressed.

*January* **SWORN TO AND SUBSCRIBED** before me on this 24 day of January 2019.

My Commission Expires:



Notary Public

A handwritten signature in black ink, appearing to be "C. McCollin", written over the "Notary Public" text.

The Florida Bar's  
Exhibit B

**AFFIDAVIT NISHA ELIZABETH BACCHUS**

STATE OF FLORIDA                     )  
  ) SS:  
COUNTY OF BROWARD                )

1. My name is Nisha Elizabeth Bacchus, and I have been a licensed and practicing attorney in the State of Florida since 2010.
2. I am the owner of Law Office of Nisha E. Bacchus, P.A., d/b/a The Bacchus Law Firm, and The Florida Women's Law Center. My office is located at 401 E Las Olas Blvd, Suite 1400, Fort Lauderdale, FL 33301.
3. My firm primarily handles family law, domestic violence, personal injury, and limited criminal defense matters.
4. I have known Mr. Russell J. Williams, Esq. since 2010.
5. Mr. Williams is a good friend of mine and a mentor to me.
6. In June 2018, Mr. Williams approached me regarding a legal matter he was experiencing with Ms. Ashley Krapacs.
7. Mr. Williams represented a client defending him in two (2) separate domestic violence injunctions filed by Ms. Krapacs, which were ultimately dismissed.
8. During and after Mr. Williams' representation of this client, Ms. Krapacs launched a series of defamatory, slanderous, and libelous statements against Mr. Williams and his law firm via the internet and various social media platforms including but not limited to: Facebook, Instagram, LinkedIn, Twitter, and YouTube.
9. As a result, Mr. Williams retained my firm in July 2018 to represent him in a defamation lawsuit against Ms. Krapacs and her respective law firm, Ashley Ann Krapacs, PLLC.
10. On or about July 26, 2018, the Complaint was filed against Ashely Ann Krapacs and Ashley Ann Krapacs, PLLC.
11. Ms. Krapacs was served with the same on or about July 31, 2018.
12. This case is currently pending in Broward County, Case No.: CACE18017850, Division: 03.
13. On or about July 31, 2018, I was attending a mediation with a client when I noticed I had several social media alerts on my cell phone which was unusual; Instagram, Facebook, and LinkedIn. I clicked on the alerts and discovered that Ms. Krapacs

had launched a cyberstalking attack, tagging myself and my law firm in several postings which were defamatory in nature, malicious, and did not serve any legitimate purpose.

14. Ms. Krapacs had tagged me personally (Nisha Elizabeth Bacchus), and my respective law firms (The Law Office of Nisha E. Bacchus, P.A., The Bacchus Law Firm, and The Florida Women's Law Center).
15. When an individual's profile or an entity's profile is "tagged" on Facebook, Instagram, or LinkedIn that tag creates a link to that individual's profile or that entity's profile. The post you tag the individual or entity in may also be added to their timeline. For example, an individual can tag a photo to show who is in the photo or post a status update and say who they are with. If an individual tags another individual or entity in their status update, anyone who sees that update can click on that individual's profile or that entity's profile. When you tag an individual or entity, they are sent a notification. Also, when an individual or entity is tagged in someone's post, the post could be visible to a specific audience of the tagging individual's choice and will be seen by the tagged person's or entity's audience.
16. These postings and the content contained therein immediately made me anxious. The postings made me anxious because Ms. Krapacs wanted to make certain that myself and my law firms were the direct targets of her disparaging postings by tagging the posts. I requested to be excused from the mediation for a few minutes to try and un-tag myself and my law firms, as well as block Ms. Krapacs and her firm from continuing to tag me and my firms.
17. This attack went on for a series of three (3) or more hours. Every time I untagged myself or my firm Ms. Krapacs would re-tag me or my firm. Ms. Krapacs even went as far to mock and make fun of me on the comments section of these postings for un-tagging myself.
18. After completing the mediation, I returned to my office and immediately proceeded to block Ms. Krapacs and her law firm from my social media accounts using my desktop computer. However, Facebook corporate webpages are unable to be blocked. Therefore, Ms. Krapacs has continuously tagged my law firms' Facebook pages via her law firm's Facebook page, and has made direct references to me individually by using my full name in these postings along with photographs of me.
19. Ms. Krapacs and her firm has been blocked to the best of my ability on Facebook, Instagram, and LinkedIn. Despite my best efforts, Ms. Krapacs has continuously tried to tag me in numerous postings since July 2018 until present, and also uses photographs of me in her postings. These photographs were used and obtained by Ms. Krapacs without my permission.
20. Since July 31, 2018, Ms. Krapacs has participated in relentless weekly cyberstalking attacks on either me personally or my firms. Ms. Krapacs either tags

myself, my firms, or provides hyperlinks that redirects the reader to my various social media platforms or my firms' webpages. These attacks have been defamatory in nature, malicious, and do not serve any legitimate purpose.

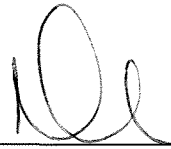
21. On August 8, 2018, Ms. Krapacs posted a blog about me and my law firm on her firm's webpage. In this blog, Ms. Krapacs calls me a series of names including a "fraud," "bully," and "asshole" and incorporates my photograph.
22. When my name or the firms' names are searched via an internet search engine, the post appears. The content of Ms. Krapacs' blog is defamatory in nature, malicious, and does not serve any legitimate purpose. Furthermore, this blog has caused emotional distress as my firm does thrive on business from the internet. Knowing that this blog, although untrue in its nature, will appear in any search engine has caused emotional distress, anxiety, and potential loss of business.
23. October 6, 2018, Ms. Krapacs began cyberstalking attacks on both me and my law firms via various social media platforms. The first attack was on October 6, 2018 via Instagram. The second attack was on October 12, 2018 via Facebook. Then again via Facebook on October 22, 25, and 26, 2018. Ms. Krapacs also made an Instagram posting on October 25, 2018 with an image that includes a shotgun. This was extremely alarming and concerning to me, as I interpreted the image to be her as the individual holding the shotgun and me as the individual facing the shotgun. The post on Instagram with the shotgun caused me emotional distress as Ms. Krapacs' postings appeared to be becoming more aggressive in nature. I take threats and acts of violence seriously given my practice areas of law. These attacks were defamatory in nature, malicious, and do not serve any legitimate purpose.
24. Each time Ms. Krapacs tags either me or my law firms an alert of the posting is received on my cell phone which causes me anxiety and emotional distress.
25. On November 29, 2018, Ms. Krapacs launched another cyberstalking attack on both me and my law firm via Facebook. In this particular posting, Ms. Krapacs tagged my law firm's Facebook page. This posting is defamatory in nature, malicious, and does not serve any legitimate purpose. An alert of the posting was received on my cell phone which caused me further anxiety and emotional distress.
26. On December 5, 2018, Ms. Krapacs launched several more cyberstalking attacks on both myself and my law firm via Facebook and Instagram. These postings are from December 5, 2018 Ms. Krapacs' personal Facebook page and Instagram; December 19, 2018 from both Ms. Krapacs' personal and corporate Facebook pages; and December 23, 2018 from Ms. Krapacs' personal Facebook page.
27. On the December 5, 2018 Facebook post Ms. Krapacs stated she had "unsavory information" about me "that is a total game changer." I interpreted this posting to mean that there would be future cyberstalking attacks to be expected that would

continue to be unpleasant in nature. This alone caused further emotional distress as it appeared that Ms. Krapacs had no intentions of stopping her attacks.

28. On December 19, 2018, I became extremely alarmed when I was alerted that Ms. Krapacs had made a social media post referencing to the type of vehicle that I drive. I was terrified when I was alerted by this posting as I have never met Ms. Krapacs, nor do we have any friends or colleagues in common. I reached out to her attorney, Patricia Acosta, Esq., who is representing her in the civil matter and expressed my concerns via email. I do not know if Ms. Acosta ever addressed this matter with Ms. Krapacs. This made me extremely uncomfortable and anxious. I reported this posting immediately to the Florida Bar.
29. On January 4, 2019, Ms. Krapacs launched yet more cyberstalking attacks on both me and my law firm via Facebook. She posted from both her personal and professional Facebook pages. These postings were also alarming as she referenced contacting clients of my law firm. Ms. Krapacs stated in her posting that she went onto the Broward County Clerk of Court to run a search on me. There, she found a small claims action that is pending against my firm due to a charging lien that was filed by my office regarding a former client, Ms. Judith Mach, who currently owes my firm money. Ms. Krapacs also made a series of untrue defamatory statements in her postings. An alert was sent to my cell phone regarding the postings which caused me anxiety and emotional distress knowing that Ms. Krapacs was trying to contact clients of my law firm.
30. On or about January 7, 2019, I advised Ms. Acosta via email of the December 19, 2018 social media post that referenced to my vehicle. After receiving no relief from Ms. Acosta, I then contacted the Florida Bar via email. It was suggested by the Florida Bar that if I perceived the identification of my vehicle as criminal in nature, to contact law enforcement. Ultimately, I decided to contact law enforcement. There is currently an open investigation with the Fort Lauderdale Police Department; Case No.: 34-1901-005968.
31. Ms. Krapacs has also launched several cyberstalking attacks against me personally and my firm via LinkedIn. I am unable to specifically identify the dates as LinkedIn tracks its posting via weeks and months not by date.
32. On January 21, 2019, an email was forwarded to me via the Florida Bar from Ms. Krapacs. In that email, Ms. Krapacs admits that, "... Further, I'll be representing several of her [my] former clients in various bar complaints and potential malpractice cases. ...". This email made me anxious as I began to realize that Ms. Krapacs was not going to stop in her attacks.
33. On or about January 22, 2019, I discovered that Ms. Krapacs had posted additional postings about me and my law firm on her corporate Instagram page. These postings are defamatory in nature, malicious, and do not serve any legitimate purpose.

34. To date, I have been sued in small claims court and have had a Florida Bar complaint filed against me by Ms. Judith Mach, to whom Ms. Krapacs has admitted in writing to representing. Ms. Mach, as stated in paragraph 28 of this affidavit, is a former client of my firm. Ms. Mach owes my firm money for legal services that were rendered during the firm's representation of her.
35. Additionally, on January 28, 2019, Ms. Krapacs filed her Notice of Appearance to represent Ms. Mach in a fee hearing against my firm.
36. Initially upon filing the cyberstalking injunction on or about January 11, 2019, I felt a sense of relief and protection. At said hearing, Ms. Krapacs requested a continuance stating that she wanted to obtain counsel to represent her and also because she had four (4) witnesses whom she wanted to testify but were unavailable. Since the hearing, Ms. Krapacs does not have any attorney, and stated in writing she will not be calling any witness other than myself and her. A special set hearing has been set for February 1, 2019 at 10:30 a.m. before Judge Stephanie Moon.
37. I do believe Ms. Krapacs is dangerous, and her actions have proven to intensify over time.
38. Ms. Krapacs has caused severe emotional distress, anxiety, worry, and concern over the past several months due to her actions and social media postings. I am constantly looking over my shoulder and worrying each time I exit my office building into the parking garage, take my trashcan in and out of my home, or pull into my driveway.
39. I have had suffered many sleepless nights due to Ms. Krapacs' actions and postings.
40. The stress and anxiety of Ms. Krapacs' behaviors have manifested itself physically in me, to the extent that I am suffering stomach issues on and off.
41. Ms. Krapacs' has continuously engaged in conduct that is prejudicial to the administration of justice, and that has frustrated my abilities to represent clients.
42. She has used means that have no substantial purposes other than to embarrass, delay, or burden me by methods of obtaining information that violate my rights to privacy and practice law.
43. I am hopeful that the Florida Bar will continue to investigate Ms. Krapacs and take every necessary action to stop her unethical behaviors.

FURTHER AFFIANT SAYETH NAUGHT.



NISHA ELIZABETH BACCHUS

The foregoing Affidavit of Nisha Elizabeth Bacchus was acknowledged before me by Nisha Elizabeth Bacchus who did not take an oath, that she executed same and that the matters set forth therein are true and correct to the best of her knowledge, information and belief.

X Personally Known To Me.

Produced Identification:

Type of Identification Produced: \_\_\_\_\_

SWORN TO AND SUBSCRIBED before me this 30 day of January, 2019.



Laura Valladares  
Commission # GG020984  
Expires: August 14, 2020  
Bonded thru Aaron Notary



Printed Name: Laura Valladares

NotaryPublic, STATE OF FLORIDA

My Commission Expires:

The Florida Bar's  
Composite  
Exhibit C

OVC 19000341 (23)  
RESPONDENT DESCRIPTION INFORMATION

ATTENTION LAW ENFORCEMENT OFFICERS, PLEASE REMOVE THIS SHEET PRIOR TO SERVICE. PLEASE DO NOT GIVE THIS SHEET TO THE RESPONDENT.

THE FOLLOWING INFORMATION MUST BE AS COMPLETE AS POSSIBLE TO ALLOW THE POLICE TO PUT THE INFORMATION INTO THEIR COMPUTERS.

SECTION I. RESPONDENTS NAME

Respondent's Full Name: Ashley Ann Krapacs, PLLC and Ashely Ann Krapacs  
Nickname/Alias: \_\_\_\_\_

SECTION II: PHYSICAL DESCRIPTION

Race White Sex: Male \_\_\_\_\_ Female ☒ Date of Birth 8/25/1985  
Age \_\_\_\_\_ Height \_\_\_\_\_ Weight \_\_\_\_\_ Hair Color Blonde Eye Color Brown  
Other Marks/Scars/Tattoos \_\_\_\_\_ Tattoo on her middle finger says "NOPE"  
Relationship to Victim Defendant on a civil case where I am counsel for Plaintiffs.

SECTION III: RESPONDENT'S ADDRESS

Current Address: Respondent's home address is unknown  
Name of Complex: \_\_\_\_\_ Bldg \_\_\_\_\_ Apt# \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
Phone No: \_\_\_\_\_ Pager/Cell Phone No: 202-341-1509

Work Address: 401 E Las Olas Blvd Suite 1400  
City Fort Lauderdale State FL Zip 33301

Last Known Address: 510 SE 5th Ave Apt 1409  
City Fort Lauderdale State FL Zip 33301

Hangouts \_\_\_\_\_

SECTION IV: RESPONDENT'S CLOSE RELATIVES

Name \_\_\_\_\_ Relationship \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

**SECTION V: LICENSE/VEHICLE INFORMATION**

Does Respondent have a valid Driver's License? ☒ Yes ☐ No State FL

**VEHICLE #1:**

Make \_\_\_\_\_ Model \_\_\_\_\_  
Year \_\_\_\_\_ Color \_\_\_\_\_ Tag No. \_\_\_\_\_ State \_\_\_\_\_

**VEHICLE #2:**

Make \_\_\_\_\_ Model \_\_\_\_\_  
Year \_\_\_\_\_ Color \_\_\_\_\_ Tag No. \_\_\_\_\_ State \_\_\_\_\_

**SECTION VI: LETHALITY ASSESSMENT**

Does Respondent have any weapons? ☐ Yes ☐ No ☒ Unknown  
If yes, type of weapon Unknown

Does Respondent have a drug problem? ☐ Yes ☐ No ☒ Unknown

Does Respondent have an alcohol problem? ☐ Yes ☐ No ☒ Unknown

Does Respondent have children in his/her care? ☐ Yes ☐ No ☒ Unknown  
If yes, how many? \_\_\_\_\_

Is the Respondent wanted by Police? ☐ Yes ☒ No ☐ Unknown  
If yes, for what? \_\_\_\_\_

Does Respondent have a criminal record? ☐ Yes ☐ No ☒ Unknown  
If yes, for what? \_\_\_\_\_

Is the Respondent expecting this Order? ☐ Yes ☒ No ☐ Unknown

**PLEASE ATTACH A PHOTOGRAPH OF RESPONDENT IF YOU HAVE ONE**

# Florida

## DRIVER LICENSE



4d DLN

1 KRA

2 ASM

8 510

FOI

3 DOB

4b EXP

12 REST

4a ISS

11/08/2017

5 DD

R031711080307

Operation of a motor vehicle constitutes  
consent to any sobriety test required by law.



**ATTENTION LAW ENFORCEMENT OFFICIAL-PLEASE DO NOT GIVE  
THIS INFORMATION TO RESPONDENT**

Petitioner's Name Law Office of Nisha E. Bacchus and Nisha E. Bacchus  
Date of Birth 05/05/1983 Race \_\_\_\_\_ Sex: Male ☐ Female ☒

Address (Only if NOT Confidential) 401 E Las Olas Blvd Suite 1400  
City Fort Lauderdale State FL Zip 33301  
Telephone Number where Petitioner may be contacted: 954-500-5555

Other ways Petitioner may be contacted:  
\_\_\_\_\_  
\_\_\_\_\_

**OTHER PROTECTED PERSON'S NAMES & ADDRESSES (If different from  
Petitioner's and NOT Confidential)**

Name \_\_\_\_\_  
Date of Birth \_\_\_\_\_ Race \_\_\_\_\_ Sex \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Name \_\_\_\_\_  
Date of Birth \_\_\_\_\_ Race \_\_\_\_\_ Sex \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Name \_\_\_\_\_  
Date of Birth \_\_\_\_\_ Race \_\_\_\_\_ Sex \_\_\_\_\_  
Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT  
IN AND FOR BROWARD COUNTY FLORIDA

Case Number DICL 19 000341  
DV 63

   In Re:

Law Office of Nisha E. Bacchus and

Nisha E. Bacchus

Petitioner,

and

Ashley Ann Krapacs, PLLC and Ashely Ann  
Krapacs

Respondent

How I Want to Proceed if the Court Does Not Enter  
an Ex Parte Temporary Injunction

I understand that, after reviewing my ex parte petition for protection (injunction), the court may:

- 1) Issue an ex parte temporary injunction and set the case for hearing with notice to the respondent, OR
- 2) Not issue an ex parte temporary injunction and set the case for hearing with notice to the respondent, OR
- 3) Deny the ex parte temporary injunction and not set the case for hearing

CHOOSE A OR B

☒ A. If the court does not grant me an ex parte temporary injunction for protection against domestic/repeat/dating/stalking/sexual violence I WANT a hearing be set. *I understand that a notice of hearing AND a copy of my petition will be provided to the respondent.*

OR

☐ B. If the court does not grant me an ex parte temporary injunction for protection against domestic/repeat/dating/stalking/sexual violence I DO NOT WANT a hearing scheduled. I understand that I am entitled to a full hearing but I do not believe it is in my best interest to have a hearing. I DO NOT WANT THE RESPONDENT TO RECEIVE A COPY OF MY PETITION AND A NOTICE OF HEARING. I GIVE UP MY RIGHT TO A FINAL HEARING AND REQUEST THAT THE CASE BE DISMISSED AT THIS TIME.

I understand that nothing in this form affects my right to amend my petition.

I also understand that my petition and this form will be available to the public as a court record.

SIGNATURE OF PETITIONER

Law Office of Nisha E. Bacchus and

PRINTED NAME OF PETITIONER

January 11, 2019

DATE

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,  
IN AND FOR BROWARD COUNTY, FLORIDA

Law Office of Nisha E. Bacchus  
and Nisha E. Bacchus \_\_\_\_\_

Petitioner.

Case No:

DVCE

19000341

63

Ashley Ann Krapacs, PLLC and Ashely  
Ann Krapacs

Respondent

PETITIONER'S WAIVER

I, Law Office of Nisha E. Bacchus and Nisha E. petitioner, filed a Petition for an Injunction  
for Protection against Violence.

If I elect not to pick up copies of the restraining order, should the same be granted, the same or next business  
day; I understand that the service packet will be automatically sent out for service upon the respondent to the  
appropriate Sheriff's Office. I further understand that copies of the order will be mailed to me at the address  
listed within the petition or any address designated by the Petitioner.

I am indicating that I intend to pick up a copy of the judge's decision on my Petition for Injunction for Protection  
against violence at the location specified below.

Central Courthouse, Fort Lauderdale ☒

West Satellite, Plantation ☐

West Satellite pickup only available if Petition for Injunction was filed at the West Satellite location.

I have read and understand the above.

\_\_\_\_\_  
Signature of Petitioner

BRENDA D. FORMAN  
CLERK OF THE CIRCUIT COURT

By \_\_\_\_\_

DEPUTY CLERK

IN THE CIRCUIT COURT OF THE  
SEVENTEENTH JUDICIAL CIRCUIT  
IN AND FOR BROWARD COUNTY,  
FLORIDA

CASE NO. DVCE 19000341

Law Office of Nisha E. Bacchus and Nisha E.  
Bacchus

\_\_\_\_\_  
Petitioner.

VS.

Ashley Ann Krapacs, PLLC and Ashely Ann  
Krapacs

\_\_\_\_\_  
Respondent

**AFFIDAVIT OF THE CLERK**

I hereby certify that pursuant to Administrative Order, No. II-95-F-5, "FAMILY COURT MODIFICATIONS, SUBSEQUENT FILINGS, CONSOLIDATION, REOPENED REPORTING AND FILE STORAGE", the Clerk has conducted a search for all previous existing domestic cases related to these two parties.

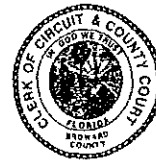
Listed below are all the aforementioned related cases:

No cases  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

BRENDA D. FORMAN, CLERK

by [Signature]

Deputy Clerk



IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,  
IN AND FOR BROWARD COUNTY, FLORIDA

Case No.: DYCE 19000341

Division: 63

Law Office of Nisha E. Bacchus and  
Nisha E. Bacchus

Petitioner,

and  
Ashley Ann Krapacs, PLLC and Ashely Ann  
Krapacs

Respondent

### NOTICE OF RELATED CASES

1. Petitioner submits this Notice of Related Cases as required by Florida Rule of Judicial Administration 2.545(d). A related case may be an open or closed civil, criminal, guardianship, domestic violence, juvenile delinquency, juvenile dependency, or domestic relations case. A case is "related" to this family law case if it involves any of the same parties, children, or issues and it is pending at the time the party files a family case; if it affects the court's jurisdiction to proceed; if an order in the related case may conflict with an order on the same issues in the new case; or if an order in the new case may conflict with an order in the earlier litigation.

[check one only]

- ☒ There are no related cases.  
☐ The following are the related cases (add additional pages if necessary):

#### Related Case No. 1

Case Name(s): \_\_\_\_\_

Petitioner \_\_\_\_\_

Respondent \_\_\_\_\_

Case No.: \_\_\_\_\_ Division: \_\_\_\_\_

Type of Proceeding: [check all that apply]

- |  |  |
|--|--|
| <input type="checkbox"/> Dissolution of Marriage   | <input type="checkbox"/> Paternity                                     |
| <input type="checkbox"/> Custody   | <input type="checkbox"/> Adoption                                      |
| <input type="checkbox"/> Child Support   | <input type="checkbox"/> Modification/Enforcement/Contempt Proceedings |
| <input type="checkbox"/> Juvenile Dependency   | <input type="checkbox"/> Juvenile Delinquency                          |
| <input type="checkbox"/> Termination of Parental Rights                                    | <input type="checkbox"/> Criminal                                      |
| <input type="checkbox"/> Domestic/Sexual/Dating/Repeat<br>Violence or Stalking Injunctions | <input type="checkbox"/> Mental Health                                 |
|  | <input type="checkbox"/> Other (specify) _____                         |

State where case was decided or is pending: ☐ Florida ☐ Other: (specify) \_\_\_\_\_

Name of Court where case was decided or is pending (for example, Fifth Circuit Court, Marion County, Florida): \_\_\_\_\_

Title of last Court Order/Judgment (if any): \_\_\_\_\_

Date of Court Order/Judgment (if any): \_\_\_\_\_

Relationship of cases check all that apply):

- ☐ pending case involves same parties, children, or issues;  
☐ may affect court's jurisdiction;  
☐ order in related case may conflict with an order in this case;  
☐ order in this case may conflict with previous order in related case.

Statement as to the relationship of the cases: \_\_\_\_\_

**Related Case No. 2**

Case Name(s): \_\_\_\_\_

Petitioner \_\_\_\_\_

Respondent \_\_\_\_\_

Case No.: \_\_\_\_\_ Division: \_\_\_\_\_

Type of Proceeding: [check all that apply]

- |  |  |
|--|--|
| <input type="checkbox"/> Dissolution of Marriage   | <input type="checkbox"/> Paternity                                     |
| <input type="checkbox"/> Custody   | <input type="checkbox"/> Adoption                                      |
| <input type="checkbox"/> Child Support   | <input type="checkbox"/> Modification/Enforcement/Contempt Proceedings |
| <input type="checkbox"/> Juvenile Dependency   | <input type="checkbox"/> Juvenile Delinquency                          |
| <input type="checkbox"/> Termination of Parental Rights                                    | <input type="checkbox"/> Criminal                                      |
| <input type="checkbox"/> Domestic/Sexual/Dating/Repeat<br>Violence or Stalking Injunctions | <input type="checkbox"/> Mental Health                                 |
|  | <input type="checkbox"/> Other (specify) _____                         |

State where case was decided or is pending: ☐ Florida ☐ Other: (specify) \_\_\_\_\_

Name of Court where case was decided or is pending (for example, Fifth Circuit Court, Marion County, Florida): \_\_\_\_\_

Title of last Court Order/Judgment (if any): \_\_\_\_\_

Date of Court Order/Judgment (if any): \_\_\_\_\_

Relationship of cases check all that apply):

- ☐ pending case involves same parties, children, or issues;  
☐ may affect court's jurisdiction;  
☐ order in related case may conflict with an order in this case;  
☐ order in this case may conflict with previous order in related case.

Statement as to the relationship of the cases: \_\_\_\_\_

**Related Case No. 3**

Case Name(s): \_\_\_\_\_

Petitioner \_\_\_\_\_

Respondent \_\_\_\_\_

Case No.: \_\_\_\_\_ Division: \_\_\_\_\_

Type of Proceeding: [check all that apply]

☐ Dissolution of Marriage

☐ Custody

☐ Child Support

☐ Juvenile Dependency

☐ Termination of Parental Rights

☐ Domestic/Sexual/Dating/Repeat  
Violence or Stalking Injunctions

☐ Paternity

☐ Adoption

☐ Modification/Enforcement/Contempt Proceedings

☐ Juvenile Delinquency

☐ Criminal

☐ Mental Health

☐ Other (specify) \_\_\_\_\_

State where case was decided or is pending: ☐ Florida ☐ Other: (specify) \_\_\_\_\_

Name of Court where case was decided or is pending (for example, Fifth Circuit Court, Marion County, Florida): \_\_\_\_\_

Title of last Court Order/Judgment (if any): \_\_\_\_\_

Date of Court Order/Judgment (if any): \_\_\_\_\_

Relationship of cases check all that apply:

☐ pending case involves same parties, children, or issues;

☐ may affect court's jurisdiction;

☐ order in related case may conflict with an order in this case;

☐ order in this case may conflict with previous order in related case.

Statement as to the relationship of the cases: \_\_\_\_\_

\_\_\_\_\_

2. [check one only]

☐ I do not request coordination of litigation in any of the cases listed above.

☐ I do request coordination of the following cases: \_\_\_\_\_

\_\_\_\_\_

3. [check all that apply]

☐ Assignment to one judge

☐ Coordination of existing cases

will conserve judicial resources and promote an efficient determination of these cases  
because: \_\_\_\_\_

4. The Petitioner acknowledges a continuing duty to inform the court of any cases in this or any other state that could affect the current proceeding.

Dated: January 11, 2019

Petitioner's Signature \_\_\_\_\_  
Printed Name: Law Office of Nisha E. Bacchus and Nisha E. [initials]  
Address: 401 E Las Olas Blvd Suite 1400  
City, State, Zip: Fort Lauderdale FL 33301  
Telephone Number: 954-500-5555  
Fax Number: 954-252-3911  
E-mail Address(es): nisha@bnlawgroup.com

### CERTIFICATE OF SERVICE

I CERTIFY that I delivered a copy of this Notice of Related Cases to the Broward County Sheriff's Department or a certified process server for service on the Respondent, and [check all used] ☐ e-mailed ☐ mailed ☐ hand delivered, a copy to {name} \_\_\_\_\_, who is the [check all that apply] ☐ judge assigned to new case, ☐ chief judge or family law administrative judge, ☐ {name} \_\_\_\_\_ a party to the related case, ☐ {name} \_\_\_\_\_, a party to the related case on {date} 1/11/2019.

Signature of Petitioner/Attorney for Petitioner \_\_\_\_\_  
Printed Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City, State, Zip: \_\_\_\_\_  
Telephone Number: \_\_\_\_\_  
Fax Number: \_\_\_\_\_  
E-mail Address(es): \_\_\_\_\_  
Florida Bar Number: \_\_\_\_\_

**IF A NONLAWYER HELPED YOU FILL OUT THIS FORM, HE/SHE MUST FILL IN THE BLANKS BELOW:**

[fill in all blanks] This form was prepared for the {choose **only one**}: ☐ Petitioner ☐ Respondent.

This form was completed with the assistance of:

{name of individual} \_\_\_\_\_  
{name of business} \_\_\_\_\_  
{address} \_\_\_\_\_  
{city} \_\_\_\_\_ {state} \_\_\_\_\_, {telephone number} \_\_\_\_\_.

## COVER SHEET FOR FAMILY COURT CASES

### I. Case Style

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,  
IN AND FOR BROWARD COUNTY, FLORIDA

Law Office of Nisha E. Bacchus and  
Nisha E. Bacchus

Case No. OCE 19000341  
Judge: 63

Petitioner,

Ashley Ann Krapacs, <sup>and</sup> PLLC and Ashely Ann  
Krapacs

Respondent

- II. Type of Action/Proceeding. Place a check beside the proceeding you are initiating. If you are simultaneously filing more than one type of proceeding against the same opposing party, such as a modification and an enforcement proceeding, complete a separate cover sheet for each action being filed. If you are reopening a case, choose one of the three options below it.

- (A) ☒ Initial Action/Petition  
(B) ☐ Reopening Case  
1. ☐ Modification/Supplemental Petition  
2. ☐ Motion for Civil Contempt/Enforcement  
3. ☐ Other

- III. Type of Case. If the case fits more than one type of case, select the most definitive.

- (A) ☐ Simplified Dissolution of Marriage  
(B) ☐ Dissolution of Marriage  
(C) ☐ Domestic Violence  
(D) ☐ Dating Violence  
(E) ☐ Repeat Violence  
(F) ☐ Sexual Violence  
(G) ☒ Stalking  
(H) ☐ Support IV-D (Department of Revenue, Child Support Enforcement)  
(I) ☐ Support Non-IV-D (not Department of Revenue, Child Support Enforcement)  
(J) ☐ UIFSA IV-D (Department of Revenue, Child Support Enforcement)  
(K) ☐ UIFSA Non-IV-D (not Department of Revenue, Child Support Enforcement)  
(L) ☐ Other Family Court  
(M) ☐ Adoption Arising Out Of Chapter 63  
(N) ☐ Name Change  
(O) ☐ Paternity/Disestablishment of Paternity  
(P) ☐ Juvenile Delinquency

- (Q) ☐ Petition for Dependency  
 (R) ☐ Shelter Petition  
 (S) ☐ Termination of Parental Rights Arising Out Of Chapter 39  
 (T) ☐ Adoption Arising Out Of Chapter 39  
 (U) ☐ CINS/FINS

IV. Rule of Judicial Administration 2.545(d) requires that a Notice of Related Cases Form, Family Law Form 12.900(h), be filed with the initial pleading/petition by the filing attorney or self-represented litigant in order to notify the court of related cases. Is Form 12.900(h) being filed with this Cover Sheet for Family Court Cases and initial pleading/petition?

- ☐ No, to the best of my knowledge, no related cases exist.  
☐ Yes, all related cases are listed on Family Law Form 12.900(h).

#### ATTORNEY OR PARTY SIGNATURE

I CERTIFY that the information I have provided in this cover sheet is accurate to the best of my knowledge and belief.

Signature \_\_\_\_\_ FL Bar No.: 89768  
 Attorney or party (Bar number, if attorney)  
 Law Office of Nisha E. Bacchus and Nisha E. Bacchus nisha@bnlawgroup.com  
 (Type or print name) (E-mail Address(es))  
 January 11, 2019  
 Date

IF A NONLAWYER HELPED YOU FILL OUT THIS FORM, HE/SHE MUST FILL IN THE BLANKS BELOW: [fill in all blanks]

This form was prepared for the: {choose only one} ☐ Petitioner ☐ Respondent

This form was completed with the assistance of:

{name of individual} \_\_\_\_\_,  
 {name of business} \_\_\_\_\_,  
 {address} \_\_\_\_\_,  
 {city} \_\_\_\_\_, {state} \_\_\_\_\_, {telephone number } \_\_\_\_\_.

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,  
IN AND FOR BROWARD COUNTY, FLORIDA

Law Office of Nisha E. Bacchus and  
Nisha E. Bacchus

Petitioner,

and  
Ashley Ann Krapacs, PLLC and  
Ashely Ann Krapacs

Respondent

Case No.:

Division:

DYCE 19000341  
(25)

## PETITION FOR INJUNCTION FOR PROTECTION AGAINST STALKING

I, {full legal name} Law Office of Nisha E. Bacchus and Nisha E. Bacchus being sworn, certify that the following statements are true:

### SECTION I. PETITIONER

(This section is about you. It must be completed; however, if you require that your address be confidential for safety reasons, you should complete and file a Request for Confidential Filing of Address, Florida Supreme Court Approved Family Law Form 12.980(h), and write confidential in the space provided on this form for your address and telephone number.)

1. Petitioner resides at the following address: {address, city, state, zip code} 401 E Las Olas Blvd Suite 1400 Fort Lauderdale FL 33301

{Indicate if applicable}

       Petitioner seeks an injunction for protection on behalf of a minor child. Petitioner is the parent or legal guardian of {full legal name}       , a minor child who is living at home.

2. Petitioner's attorney's name, address, and telephone number is: None

(If you do not have an attorney, write "none.")

### SECTION II. RESPONDENT

(This section is about the person you want to be protected from. It must be completed.)

1. Respondent resides at the following address: {provide last known street address, city, state, and zip code} Respondent's home address is unknown

2. Respondent's last known place of employment: Ashley Ann Krapacs, PLLC  
Employment address: 401 E Las Olas Blvd Suite 1400 Fort Lauderdale FL 33301  
Working hours of Respondent: Unknown

3. Physical description of Respondent:

Race: White Sex: Male      Female ✓ Date of Birth: 8/25/1985  
Height:      Weight:      Eye Color Brown Hair Color: Blonde  
Distinguishing marks and/or scars: Tattoo on her middle finger says "NOPE"  
Vehicle: (make/model)      Color:      Tag Number (if known)     

4. Other names Respondent goes by (aliases or nicknames):

5. Respondent's attorney's name, address, and telephone number is: Unknown.

(If you do not know whether Respondent has an attorney, write "unknown." If Respondent does not have an attorney, write "none.")

**SECTION III. CASE HISTORY AND REASON FOR SEEKING PETITION (This section must be completed.)**

1. Has Petitioner ever received or tried to get an injunction for protection against stalking against Respondent in this or any other court?

☐ Yes ☒ No If yes, what happened in that case? *{Include case number, if known}*

2. Has Respondent ever received or tried to get an injunction for protection against stalking against Petitioner in this or any other court?

☐ Yes ☒ No If yes, what happened in that case? *{Include case number, if known}*

3. Describe any other court case that is either going on now or that happened in the past between Petitioner and Respondent (include case number, if known):

N/A

4. Petitioner is a victim of stalking because Respondent has: *{please mark all sections that apply}*

- a. ☒ Committed stalking;
- b. ☒ Previously threatened, harassed, stalked, cyberstalked, or physically abused the Petitioner;
- c. ☐ Threatened to harm Petitioner or family members or individuals closely associated with Petitioner;
- d. ☐ Intentionally injured or killed a family pet;
- e. ☐ Used, or threatened to use, against Petitioner any weapons such as guns or knives;
- f. ☐ A criminal history involving violence or the threat of violence, if known;
- g. ☐ Another order of protection issued against him or her previously from another jurisdiction, if known;
- h. ☐ Destroyed personal property, including, but not limited to, telephones or other communication equipment, clothing, or other items belonging to Petitioner.

5. Below is a description of the specific incidents of stalking or cyberstalking: *{for cyberstalking, please include a description of all evidence of contacts and/or threats made by Respondent in voice messages, texts, emails, or other electronic communication}*

On {dates} \_\_\_\_\_ the following incidents of stalking occurred at the following locations: *{the locations may include, but need not be limited to, a home, school, or place of employment}* Please see attached.

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☒ Please indicate here if you are attaching additional pages to continue these facts.

**6. Additional Information**

\_\_\_\_\_ Respondent owns, has, and/or is known to have guns or other weapons.

Describe weapon(s) and where they may be located, if known:

Unknown

**SECTION IV. INJUNCTION** *{This section must be completed}*

1. Petitioner asks the Court to enter a TEMPORARY INJUNCTION for protection against stalking that will be in place from now until the scheduled hearing in this matter, which will immediately restrain Respondent from committing any acts of stalking, and which will provide any terms the Court deems necessary for the protection of a victim of stalking, including any injunctions or directives to law enforcement agencies.
2. Petitioner asks the Court to enter, after a hearing has been held on this petition, a FINAL JUDGMENT for protection against stalking prohibiting Respondent from committing any acts of stalking against Petitioner and:

- a. prohibiting Respondent from going to or within 500 feet of any place Petitioner lives, or to any specified place regularly frequented by Petitioner and any named family members or individuals closely associated with Petitioner;

Petitioner's home. Petitioner will file this address under seal.

- b. prohibiting Respondent from going to or within 500 feet of Petitioner's place(s) of employment or the school that Petitioner attends; the address of Petitioner's place(s) of employment and/or school is: 401 E Las Olas Blvd, Suite 1400, Fort Lauderdale,

FL 33301

- c. prohibiting Respondent from contacting Petitioner by telephone, mail, by e-mail, in writing, through another person, or in any other manner;
  - d. ordering Respondent that he or she shall not have in his or her care, custody, possession, or control any firearm or ammunition;
  - e. prohibiting Respondent from knowingly and intentionally going to or within 100 feet of Petitioner's motor vehicle, whether or not that vehicle is occupied;
3. Petitioner asks the Court to enter any other terms it deems necessary to protect Petitioner from stalking by Respondent.

I UNDERSTAND THAT BY FILING THIS PETITION, I AM ASKING THE COURT TO HOLD A HEARING ON THIS PETITION, THAT BOTH THE RESPONDENT AND I WILL BE NOTIFIED OF THE HEARING, AND THAT I MUST APPEAR AT THE HEARING. I UNDERSTAND THAT IF EITHER THE RESPONDENT OR I FAIL TO APPEAR AT THE FINAL HEARING, WE WILL BE BOUND BY THE TERMS OF ANY INJUNCTION OR ORDER ISSUED AT THAT HEARING.


I HAVE READ EVERY STATEMENT MADE IN THIS PETITION AND EACH STATEMENT IS TRUE AND CORRECT. I UNDERSTAND THAT THE STATEMENTS MADE IN THIS PETITION ARE BEING MADE UNDER PENALTY OF PERJURY, PUNISHABLE AS PROVIDED IN SECTION 837.02, FLORIDA STATUTES.

Dated: January 11, 2019

Signature of Petitioner

Law Office of Nisha E. Bacchus and Nisha E. Bacchus  
401 E Las Olas Blvd Suite 1400  
Fort Lauderdale FL 33301  
954-500-5555  
954-252-3911

STATE OF FLORIDA  
COUNTY OF BROWARD

Sworn to or affirmed and signed before me on January 11, 2019 by Law Office of Nisha E. Bacchus and Nisha E. Bacchus 



Laura Valladares  
Commission # GG020984  
Expires: August 14, 2020  
Bonded thru Aaron Notary

NOTARY PUBLIC or DEPUTY CLERK

Laura Valladares

*{Print, type, or stamp commissioned name of notary or clerk.}*



Personally known

Produced identification

Type of identification produced \_\_\_\_\_

## **July 2018**

On or about mid July 2018, my office was retained by Mr. Russell J. Williams, Esq. and Russell J. Williams, P.A. in connection with a civil litigation claim for defamation, libel and slander against Respondent. Respondent is an attorney licensed to practice law in Florida, New York, and the District of Columbia.

On or about July 26, 2018, the Complaint was filed, and Respondent was served with the same on July 31, 2018. This case is currently pending in Broward County, Case No.: CACE18017850, Division: 03.

On or about July 31, 2018, I was attending mediation with a client when I noticed I had several social media alerts on my cell phone which was unusual; Instagram, Facebook, and LinkedIn. I clicked on the alerts and discovered that Respondent had launched a cyberstalking attack, tagging myself and my law firm in several postings which were defamatory in nature, malicious, and did not serve any legitimate purpose. A copy of the social media postings from July 31, 2018 are attached hereto and incorporated herein as "Composite Exhibit A." Contained within Composite Exhibit A is a timeline review from Respondent's personal Facebook page which tags my full name as registered with Facebook; a posting from Respondent's personal Facebook page which contains the Florida Women's Law Center to which I am the owner and president; another timeline review from Respondent's corporate Facebook page which tags me personally; and a posting notification from Instagram tagging my personal Instagram page as registered with Instagram.

This immediately made me anxious. I asked to be excused from the mediation for a few minutes to address the issue. Since I did not have computer access, I was limited in my ability to block Respondent and untag the postings. When I tried to untag myself or my firm, Respondent repeatedly re-tagged me or the firm. This went on for a series of a few hours until I completed mediation and was able to return to my office to address the issue from a computer. Respondent even posted several comments mocking me for untagging myself and my firm. Please see Composite Exhibit A Timeline Review from Facebook – comments section.

I was eventually able to block Respondent's personal Facebook page. However, Facebook corporate webpages are unable to be blocked. Therefore, Respondent has continuously tagged my law firm's Facebook page via her law firm's Facebook page, and has made direct references to me individually by using my full name in these postings along with photographs of me.

Respondent has been blocked to the best of my ability on Facebook, Instagram, and LinkedIn. Despite my best efforts, Respondent has continuously tried to tag me in numerous postings since July 2018 until present, and also uses photographs of me in her postings.

## **August 2018**

Since July 31, 2018, the Respondent has participated in relentless weekly cyberstalking attacks on either me personally or my firm. Respondent either tags myself, my firm, or provides hyperlinks that redirect the reader to my various social media platforms or my firm's webpage. These attacks have been defamatory in nature, malicious, and do not serve any legitimate purpose.

On August 8, 2018, Respondent posted a blog about myself and my law firm on her firm's webpage. A copy of the blog is attached hereto and incorporated herein as "Exhibit B." In this blog, Respondent calls me a series of names including a "fraud," "bully," and "asshole" and incorporates my photograph.

When my name or the firm's name is searched via an internet search engine, the post appears. The content of Respondent's blog is defamatory in nature, malicious, and does not serve any legitimate purpose. Furthermore, this blog has caused me emotional distress as my firm does thrive on business from the internet. Knowing that this blog, although untrue in its nature, will appear in any search engine has caused me emotional distress, anxiety, and potential loss of business.

## **September 2018**

On September 12, 2018, Respondent filed a notice of unavailability in Broward County, Case No.: CACE18017850, Division: 03 commencing September 12, 2018 though October 12, 2018.

## **October 2018**

Beginning October 6, 2018, Respondent began cyberstalking attacks on both myself and my law firm via various social media platforms. The first attack was on October 6, 2018 via Instagram. The second was on October 12, 2018 via Facebook. Then again via Facebook on October 22, 25, and 26, 2018. Respondent also made an Instagram posting on October 25, 2018 with an image that includes a shotgun. This was extremely alarming and concerning to me. A copy of the postings from October 2018 are attached hereto and incorporated herein as "Composite Exhibit C." These attacks were defamatory in nature, malicious, and do not serve any legitimate purpose. Each time Respondent tags either myself or my law firm an alert of the posting is received on my cell phone which causes me anxiety and ultimately emotional distress. I was most concerned and alarmed by the posting that contained an image of a shotgun as I take threats and acts of violence seriously given my areas of practice (criminal defense, family law, and domestic violence).

## **November 2018**

On November 29, 2018, Respondent launched another cyberstalking attack on both myself and my law firm via Facebook. In this particulate posting, Respondent tags

my law firm's Facebook page. A copy of the November 29, 2018 Facebook posting is attached hereto and incorporated herein as "Exhibit D." This positing is defamatory in nature, malicious, and do not serve any legitimate purpose. An alert of the posting was received on my cell phone which caused me further anxiety and ultimately emotional distress.

## **December 2018**

On December 5, 2018, Respondent launched several more cyberstalking attacks on both myself and my law firm via Facebook and Instagram. These postings are from December 5, 2018 Respondent's personal Facebook page and Instagram; December 19, 2018 from both Respondent's personal and corporate Facebook pages; and December 23, 2018 from Respondent's personal Facebook page.

On the December 5, 2018 Facebook post Respondent states she has "unsavory information" about me "that is a total game changer." This posting in particular is an anticipation that there are further cyberstalking attacks to be expected.

The December 19, 2018 posting was extremely alarming as Respondent made reference to the type of vehicle that I drive. I was terrified when I was alerted by this positing as I have never met Respondent, nor do we have any friends or colleagues in common with her. I reached out to her attorney, Patricia Acosta, Esq., who is representing Respondent in the civil matter and expressed my concerns via email. I do not know if Ms. Acosta ever addressed this matter with Respondent. This made me extremely uncomfortable and anxious. I reported this posting immediately to the Florida Bar.

A copy of the December 2018 Facebook posts is attached hereto and incorporated herein as "Composite Exhibit E." These postings are defamatory in nature, malicious, and do not serve any legitimate purpose. Alerts were sent to my cell phone each time there was a posting which caused me more anxiety and ultimately emotional distress.

## **January 2019**

On January 4, 2019, Respondent launched yet more cyberstalking attacks on both myself and my law firm via Facebook. She posted from both her personal and professional Facebook pages. These postings were also alarming as she referenced to contacting clients of the firm. Respondent states in her posting that she went onto the Broward County Clerk of Court to run a search on me. There, she found a small claims action that is pending due to a charging lien that was filed by my office regarding a former client. She also makes a series of untrue defamatory statements. An alert was sent to my cell phone regarding the postings which caused me anxiety and ultimately emotional distress. A copy of the January 4, 2019 posts are attached hereto and incorporated herein as "Composite Exhibit F."

Ultimately, I decided to contact law enforcement upon the request of the Florida Bar. A copy of the Florida Bar's email is attached hereto and incorporated herein as "Exhibit

G." I contacted law enforcement and there is currently an open investigation; Case No.: 34-1901-005968.

**LinkedIn**

Respondent has also launched several cyberstalking attacks against me personally and my firm via LinkedIn. I am unable to specifically identify the dates as LinkedIn tracks its posting via weeks and months not by date. A copy of the LinkedIn postings are attached hereto and incorporated herein as "Composite Exhibit H."

## **COMPOSITE EXHIBIT A**



## Timeline Review



Timeline Review

Settings



**Ashley Krapacs**



6 mins ·

**Nisha Elizabeth Bacchus.** Damn, girl. You must be hard up for new cases to take on a piece of garbage like Russell J. Williams. And you promote yourself as being "pro-women's rights." How do you sleep at night? **#sellout #womanhater #metoo #timesup #endrapeculture #endsexism #endmisogyny**



LITIGATIONSOUTHFLORIDA.COM

**Attorney for Women's Legal Issues in Ft. Lauderdale, FL**



Like



Comment



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< Florida Women's Law Center. Damn, gir...



litigationsouthflorida.com

**Attorney for Women's Legal Issues in Ft. Lauderdale, FL**



Like



Comment



Share



4



**Ashley Krapacs**

She untagged herself!!! 😂😂😂😂😂😂



2 hrs

Like

Reply

More



**Laura Stark**

Nisha E. Bacchus? Dig in to her 10.0 AVVO rating, **Ashley Krapacs**.



1 hr

Like

Reply

More



Write a comment...

Post





Facebook

**Ashley Krapacs**

3 hrs ·



Florida Women's Law Center. Damn, girl. You must be hard up for new cases to take on a piece of garbage like Russell J. Williams. And you promote yourself as being "pro-women's rights." How do you sleep at night? #sellout #womanhater #metoo #timesup #endrapeculture #endsexism #endmisogyny



litigationsouthflorida.com

**Attorney for Women's Legal Issues in Ft.  
Lauderdale, FL**

4

2 Comments



Like



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# < Florida Women's Law Center. Damn, gir...

**Ashley Krapacs**

3 hours ago

Nisha Elizabeth Bacchus. Damn, girl. You must be hard up for new cases to take on a piece of garbage like Russell J. Williams. And you promote yourself as being "pro-women's rights." How do you sleep at night? #sellout #womanhater #metoo #timesup #endrapeculture #endsexism #endmisogyny #endrapeculture

■ Added a link preview to this post.

**Ashley Krapacs**

3 hours ago

Nisha Elizabeth Bacchus. Damn, girl. You must be hard up for new cases to take on a piece of garbage like Russell J. Williams. And you promote yourself as being "pro-women's rights." How do you sleep at night? #sellout #womanhater #metoo #timesup #endrapeculture #endsexism #endmisogyny

**Ashley Krapacs**

3 hours ago

Nisha Elizabeth Bacchus. Damn, girl. You must be hard up for new cases to take on a piece of garbage like Russell J. Williams. And you promote yourself as being "pro-women's rights." How do you sleep at night? #sellout #womanhater #metoo #timesup #endrapeculture #endsexism #endmisogyny





**Photos for you to review**  
Review 1 photo you might be in.



Timeline Review

Settings



**Ashley Ann Krapacs, PLLC**



1 min · 🌐

Ya'll, social media is no joke. You want to act a fool and be a jerk to people? Go right ahead. But don't expect people not to call you out for it. I'm talking to you, **Nisha Elizabeth Bacchus**. The choices you make in life form what becomes your personal brand. What do your choices say about you? **#beempowered #metoo #timesup #womensrights #humanrights #domesticviolence #calledout #exposed #notafraid #sellout #traitor #endsexism #endmisogyny**



YOUTUBE.COM

**Stand Up for What you Believe In - Be Empowered Vlog 16**

Ashley discusses the importance of standing up for what you believe in. You...



Like



Comment



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Hide





Instagram



No,  
I do not  
yield.

Ashley Ann Krapacs, Esq. @N... · 42s ✓

When you get sued for [#defamation](#) for speaking publicly about being a [#domesticviolence](#) survivor, and you discover the attorney who filed the case is a WOMAN (Nisha Bacchus) who claims to be a [#womensrights](#) supporter. [#wow](#) [#nope](#) [#areyouforreal](#) [#traitor](#) [#womanhater](#) [#metoo](#) [#TimesUp](#)



No,  
I do not  
yield.

Ashley Ann Krapacs, Esq. @NoI... · 5h ✓

Russell J. Williams, partner at [@WHWG\\_LAW](#), sued me for [#defamation](#). Way to harass a survivor of [#domesticviolence](#) and [#rape](#), you pig! Oh, and [#TRUTH](#) is an absolute defense to defamation, moron, so good luck with that. Smfh. [#metoo](#) [#timesup](#) [#frivolous](#) [#vindictive](#) [#bully](#)



noidonotyield Exposing [@bacchus\\_law](#) for the woman she REALLY is. [#traitor](#) [#sellout](#) [#womanhater](#)



## **EXHIBIT B**

my cases. It's essentially the same set of co...

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## Female Attorney Nisha Bacchus Files Frivolous Lawsuit Against Domestic Violence Survivor

August 8, 2018 | Ashley Krapacs



The female members of the patriarchy are perhaps the most dangerous. Case in point, attorney Nisha Bacchus. She filed a completely frivolous lawsuit against a sexual assault survivors, a woman who has been put through hell and harassed and tormented by a whole army of a...

[Read More](#)

## Top 3 Things Employers Need to Know About the #metoo Movement

July 27, 2018 | Ashley Krapacs



When I tell people I'm a sexual harassment attorney, many ask which side I'm on: plaintiff (employee) side, or defendant (employer) side. The reality is, I support safe, harassment-free, discrimination-free workplaces.

## Recent Posts



The HR Power Play  
December 14, 2018



Female Attorney Nisha Bacchus Files Frivolous Lawsuit Against Domestic Violence Survivor  
August 8, 2018



Top 3 Things Employers Need to Know About the #metoo Movement  
July 27, 2018



What to do if You're Sexually Harassed at Work  
June 11, 2018



Supreme Court Makes it Harder for Employees to Pursue Class Action Lawsuits  
May 28, 2018



When You Don't

# Ashley Ann Krapacs, PLLC

## Be Empowered Blog

### Female Attorney Nisha Bacchus Files Frivolous Lawsuit Against Domestic Violence Survivor

August 8, 2018 | Ashley Krapacs



The female members of the patriarchy are perhaps the most dangerous. Case in point, attorney Nisha Bacchus.

She filed a completely frivolous lawsuit against a sexual assault survivor, a woman who has been put through hell and harassed and tormented by a whole army of attorneys for nearly eight months now. I'd know, because that woman is me.

## Featured Posts



Supreme Court Makes it Harder for Employees to Pursue Class Action Lawsuits  
May 28, 2018

## Recent Posts



The HR Power Play  
December 14, 2018



Female Attorney Nisha Bacchus Files

If you follow my work, you've likely heard me talk about my story, or at least bits and pieces of it. After confronting a former boyfriend about raping me, he waged a full-on war against me. He even got a number of attorneys to join in on the fight. He's a very wealthy and vindictive man, and I've learned the hard way that everyone can be bought, you just have to figure out their price. And Gregory Knoop could afford the prices of a whole lot of questionable attorneys: Russell J. Williams, Esquire of [Williams Hilal Wigand Grande Law Firm](#); James Drakeley and M. Kenneth Patterson of [Hiersche Hayward Drakeley Urbach](#); David Benowitz of [Price Benowitz](#); and Kevin Tynan of [Richardson & Tynan PLC](#).

Until recently, though, they were all males. So I'm admittedly disheartened to learn that a female has joined that fight. But again, everyone can be bought. And Russell J. Williams of [Williams Hilal Wigand Grande Law Firm](#) paid her price.

The backstory is this: upon the advice of several attorneys and domestic violence organizations, I filed for an Injunction of Protection Against Domestic Violence against my former boyfriend, Gregory Knoop, back in January. Gregory Knoop hired Russell J. Williams to represent him in the injunction case. After a particularly appalling hearing in April (in which my motions were ignored, I was prevented from speaking, and the judge interrupted me a minimum of eleven times in thirty minutes), I wrote an article expressing my shock and indignation at how biased the proceeding was against me. In particular, I pointed out that Mr. Russell J. Williams had lied repeatedly when the judge asked him if he had received my Motion to Amend the Petition. When I tried to speak up and say that I had proof Mr. Williams received the motion, the judge kept shushing me and giving Mr. Williams more and more opportunities to correct his statement. And Mr. Williams kept lying. He kept digging himself down further. At one point, he even concocted this whole story about the clerk's office to try to defend his lie. But then, realizing I was going to call him out regardless and that he was stuck, he finally corrected, on about the fifth opportunity that the judge gave him. This is documented clearly in the official court record.

I wrote an article about the incident. The article truthfully described what had transpired at the hearing. And now Mr. Williams is crying foul. Because HE lied. On the record. Repeatedly. He's suing me for defamation (even though truthful statements cannot, by definition, be

Frivolous  
Lawsuit Against  
Domestic  
Violence  
Survivor  
August 8, 2018



Top 3 Things  
Employers Need  
to Know About  
the #metoo  
Movement  
July 27, 2018



What to do if  
You're Sexually  
Harassed at  
Work  
June 11, 2018



Supreme Court  
Makes it Harder  
for Employees  
to Pursue Class  
Action Lawsuits  
May 28, 2018



When You Don't  
Let Female  
Lawyers Talk,  
We'll Only Get  
Louder  
April 23, 2018



6 Steps We Can  
All Take to  
Narrow the  
Gender Pay Gap  
April 10, 2018



When it Comes  
to Sexual  
Harassment,  
We've Still got a



When it Comes  
to Sexual  
Harassment,  
We've Still Got a  
Long Way to  
Go, Baby  
April 9, 2018

I wrote an article about the incident. The article truthfully described what had transpired at the hearing. And now Mr. Williams is crying foul. Because HE lied. On the record. Repeatedly. He's suing me for defamation (even though truthful statements cannot, by definition, be defamatory) when it's his own horrendous conduct that has painted him in a negative light.

You can't lie and cheat your way through cases and then demand confidentiality at the same time. It just doesn't work like that. You want to act like an ass? I will call you out, publicly.

The defamation suit is intended only to harass and intimidate me. Mr. Williams knows it. And so does Nisha Bacchus. But she sold out anyway. She's helping a hateful bully continue to torment me. She's helping a sexist pig continue to psychologically torture me. It's gotta be a painful existence to live as a woman and also hate women so much at the very same time.

The website of Nisha Bacchus tells me everything I need to know about this woman: she's thirsty for work. So hard up, she'll engage with a scumbag like Russell J. Williams. It's pathetic, really. She uses plural pronouns like "we" and "our" throughout the site, but it's just her. Well, her and one paralegal. News flash: one attorney means you operate a solo practice. Which is quite different from a multi-lawyer law firm. Don't get me wrong. There's nothing wrong with being a solo. I'm a solo. I like working by myself, and I wouldn't have it any other way. But I own it. I don't put myself out as being something I'm not. I don't have to deceive my clients to get their business. Apparently, Ms. Bacchus does.

She also states that she "heads the Family Law, Personal Injury & Corporate Law Divisions." It is laughable to think a solo practitioner would have a need for different "divisions," since it's just her, but I guess having that verbage on her homepage makes her feel special. She also refers to her paralegal as the "managing paralegal." Who or what she manages is a mystery. These statements are just more deceptive swill intended to trick clients into believing that Ms. Bacchus's firm is something that it's not.

But here's the most disturbing part of Ms. Bacchus's website: the "Florida Women's Law Center" section. Click on that link, and the whole website turns pink, and she claims to be a supporter of women's

## Archive

December 2018 (1)

August 2018 (1)

July 2018 (1)

June 2018 (1)

May 2018 (1)

April 2018 (3)

## Search By

## Tags

bullying equal pay  
gender pay gap  
sexual harassment  
wage discrimination  
women's rights

But here's the most disturbing part of Ms. Bacchus's website: the "Florida Women's Law Center" section. Click on that link, and the whole website turns pink, and she claims to be a supporter of women's rights. She throws around a lot of statistics but cites no sources. And she even claims to help women who are victims of abuse.

## Are you kidding me?

What a fraud. She pretends to care about women. She pretends to support women's rights issues. She pretends to care about women who have been abused.

And that's when I call BS. Her actions speak much louder than the garbage on her website. Filing a frivolous defamation suit against a rape survivor who has been harassed and bullied for months, just so she can make a few bucks, is certainly NOT helping women's rights. It's only helping to perpetuate the serious challenges that women face, helping to perpetuate rape culture and the abuse and torment of innocent women.

In a lot of ways, Nisha Bacchus is just like Russell J. Williams: a bully who wants to act like an asshole, but then pretend like she's something she's not, and just try to avoid she getting called out for who she really is. Well, sorry, sweetie, but you can't have it both ways. If you want to take clients like Russell J. Williams, you can't also claim to support women's rights and the #metoo movement. That math just doesn't add up. And I will call you out and scream it from the rooftops: Nisha Bacchus is nothing more than an insecure, hateful, jealous woman who hates women.

See you in court.

Tags: women's rights bullying

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401 E Las Olas Blvd



## **COMPOSITE EXHIBIT C**



Photo



ashleykrapacs

Supreme Court, United States

...



28 likes

ashleykrapacs I've spent the past 9 months being very careful about my social media, hiding my location out of fear that my vindictive, rapey ex would find me and harm me. I've lived in the shadows, constantly looking over my shoulder, paranoid and terrified, for the better part of a year.

Well, I'm done hiding. Fuck my ex and his battalion of lawyers. You want to hurt me, you want to keep fucking with me, bring it.

I'm in DC. I'm here for a wedding.

I spent the morning wandering around, feeling nostalgic yet right at home. I started walking towards the National Geographic building, thinking I'd spend the afternoon there. But then my feet carried me back to my hotel. Up to my room. I threw on my running clothes. And I set out.

On auto-pilot, I glided down 14th Street. When my feet hit the dirt and gravel surface of the National Mall, I turned left and started running towards the Capitol. The same route I ran regularly for basically a decade. But when I reached the Capitol, instead of turning around, without thinking, I kept heading east. Further and further. Up and around the north side of the Capitol, until I could hear the protesters.

I could hear them well before I could see them. I kept running towards the noise. And I came upon this scene.





Photo



28 likes

**ashleykrapacs** I've spent the past 9 months being very careful about my social media, hiding my location out of fear that my vindictive, rapey ex would find me and harm me. I've lived in the shadows, constantly looking over my shoulder, paranoid and terrified, for the better part of a year.

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I could hear them well before I could see them. I kept running towards the noise. And I came upon this scene.

Thousands of activists protesting at the Supreme Court.

And I wept. I sobbed and sobbed. Overwhelmed, angry, relieved, exhausted.

I cried for me. I cried for us. I cried for the survivors. I cried for this country.

My body is mine. My life matters. My story matters. And FUCK anyone who says it doesn't.

Fuck Gregory Knoop.

Fuck Russell J. Williams.

Fuck Williams Hilal Wigand Grande law firm.

Fuck Nisha Bacchus.

Fuck Bacchus Law.

Fuck David Benowitz.

Fuck Seth Price.

Fuck Price Benowitz law firm.

Fuck Kevin Tynan.

Fuck James Drakeley.

Fuck Kenneth Patterson.

Fuck Hiersche, Hayward, Drakeley & Urbach law firm.

Fuck everyone who perpetuates [#rapeculture](#). Fuck everyone who perpetuates [#misogyny](#). Fuck everyone who perpetuates violence against women.

You might get Kavanaugh. But you've waged a war that you cannot win. [#Progress](#) is coming whether you like it or not. And you will be held accountable. I will never stop fighting. [#metoo](#) [#timesup](#)

View all 3 comments

OCTOBER 6, 2018



Ashley Krapacs



Ashley Krapacs

October 12 · 🌐



Hurling threats and abuse against vulnerable sexual assault survivors until they are beaten down into silence is not a legitimate legal tactic. Yet this conduct goes on every day. This is the approach that Russell J. Williams of **Williams, Hilal, Wigand & Grande, PLLC.** law firm used against me when I filed for a restraining order against my violent ex-boyfriend. When I questioned Mr. Williams's tactics and spoke publicly about them, he sued me.

You can't have your cake and eat it, too. You want to abuse sexual assault survivors and re-traumatize them so that you can achieve a certain result in a case? Fine. But you're not entitled to confidentiality regarding the legal tactics you choose to utilize.

Not only did he and his attorney, **Law Office of Nisha E. Bacchus, P.A.**, file a frivolous lawsuit against me, they did so mere weeks after my father died. The vicious attacks that go on in this world are appalling.

They've been harassing and tormenting and trying to silence me for months. But it won't work. I won't stop fighting. But I can't do it alone. Please consider contributing to my legal defense fund, if you have not already done so. Together, we'll make sure survivors won't have to suffer in silence any longer. **#metoo #timesup #believesurvivors #womensrights #equalrights #endrapeculture**

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🔍 Ashley Krapacs

👍👎 16

2 Comments

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💬 Comment

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Ashley Krapacs

October 22 · 🌐



Case Update: my rockstar attorney was able to get the defamation case unsealed, so it's now properly appearing in the public record. If you go to [www.browardclerk.org](http://www.browardclerk.org) and conduct a "Case Search" for my name, you'll see the case there. And you can read in my Motion for Summary Judgment why Russell J. Williams of **Williams, Hilal, Wigand & Grande, PLLC.** law firm was so butt hurt and angry and determined to have the case sealed. But it doesn't work like that. As I've said from the start, you can't sue someone in civil court and then expect confidentiality. Anyone who's being sued is entitled and expected to launch a full, thorough defense against the plaintiff. If you can't stand the heat, get out of the kitchen.

When I was interviewing attorneys, every single one that I spoke with said to me, point blank, "Cases don't just disappear like that. There's no way that happened." Well, it did! **Law Office of Nisha E. Bacchus, P.A.** was able to have the case ILLEGALLY sealed for weeks. And to top it up, I just found out that while the case was sealed (and while I was effectively boxed out of access and participation in the case), she filed several things and provided me with absolutely no notice, even though I'm listed in the court's e-service system. No idea where this lunatic went to law school, but it must have been a school that doesn't put a whole lot of emphasis on, ya know, THE LAW, and just basic due process. Smfh. #metoo #timesup #bullies #amateurhour #womensrights #equalrights #endviolenceagainstwomen #endrapeculture #endthepatriarchy

👍👎❤️ 31

9 Comments

👍 Like

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Photo



when opposing counsel tries to use  
the same exact trick you saw in  
your last case



15 likes

ashleykrapacs Ya'll, I just can't with this diva. SIMPLY CANNOT! Nisha Bacchus clearly isn't a fan of my social media. Today, she tells my attorney that she's going to sue me (more) for my recent posts about her. Apparently, she's gone through all the contents of her Bag of Tricks to Mindfuck Sexual Assault Survivors, and now she has to keep reusing the contents. She's already tried using her personal connections at the Florida Bar to silence me. Didn't work. She tried using her connections at the court to silence me. Didn't work. She and her client, Russell J. Williams of Williams Hilal Wigand Grande law firm, even threatened to use personal connections at the state's attorneys office to have me arrested. Even then, I refused to be silenced. This lady is OUT OF CONTROL. Nothing but an evil bully. Bring it, diva. NOTHING they can do to me is going to silence me from speaking the truth about what people like them do to vulnerable  
[#sexualassaultsurvivors](#). [#metoo](#) [#timesup](#) [#womensrights](#) [#believesurvivors](#) [#humanrights](#) [#enoughisenough](#)

OCTOBER 25, 2018



🔍 Ashley Krapacs



Like



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**Ashley Krapacs**

October 25 · 🌐



Ya'll, I just can't with this diva. SIMPLY CANNOT! Nisha Bacchus clearly isn't a fan of my social media. How do I know? For one thing, she must have spent all day on the phone with Facebook, because I'm not able to tag her or her law firm anymore. So much for the First Amendment!

On top of that, today, she tells my attorney that she's going to sue me (more) for my recent posts about her. Apparently, she's gone through all the contents of her Bag of Tricks to Mindfuck Sexual Assault Survivors, and now she has to keep reusing the contents. She's already tried using her personal connections at the Florida Bar to silence me. Didn't work. She tried using her connections at the court to silence me. Didn't work. She and her client, Russell J. Williams of **Williams, Hilal, Wigand & Grande, PLLC.** law firm, even threatened to use personal connections at the states attorney office to have me arrested. Even then, I refused to be silenced. This lady is OUT OF CONTROL. Nothing but an evil bully. Bring it, diva. NOTHING they can do to me is going to silence me from speaking the truth about what people like Nisha Bacchus and Russell J. Williams do to vulnerable **#sexualassaultsurvivors. #metoo #timesup #womensrights #believesurvivors #humanrights #enoughisenough**



16

2 Comments



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Ashley Krapacs

Oct 26, 2018

I heard from the Florida bar today regarding the multiple ethics complaints that have been filed against me by Russell J. Williams (partner at [Williams, Hilal, Wigand & Grande, PLLC](#). Law firm) and my ex, Gregory Knoop. Given the timing of the email and that I hadn't heard anything from them at all for weeks, I have to assume that it's not a coincidence. It is solely my opinion, but I have to believe Nisha is behind it. Anyway, they updated to let me know I'm still being investigated. Russell J. Williams lies repeatedly in open court to a judge, he abuses the procedures of the law and uses them to harass and intimidate me, and the Florida bar declines to discipline him in the least. That determination was made incredibly swiftly, within a number of weeks. I'm getting harassed and tormented by two members of their bar for months, and now I'm the one being investigated. The complaints against me have been pending since the spring. The double standard that is being applied to me is maddening. And then the fact that there's obviously a LOT going on behind the scenes that I'm not privy to is incredibly upsetting. This is ya world we live in. It's 2018, and young female attorneys are held to an entirely different standard than the Old White Males. It may cost me my bar license to keep writing publicly about the state of this field, but I don't feel I have any other choice. Sitting down and shutting up and staying silent about how [#sexualassaultsurvivors](#) are treated by this profession is just not something I'm able to do. Coincidentally, today is the 3 year anniversary of the day I found out I passed the bar and would become a lawyer. I'm saddened to think that might not be the case for much longer, but I can't stay in a profession that tolerates this sort of treatment of women. [#metoo](#) [#timesup](#) [#believesurvivors](#) [#womensrights](#) [#humanrights](#) [#enddomesticviolence](#) [#endsexualassault](#) [#endviolenceagainstwomen](#)



Ashley Krapacs

Oct 26, 2018

I heard from the Florida bar today regarding the multiple ethics complaints that have been filed against me by Russell J. Williams (partner at [Williams, Hilal, Wigand & Grande, PLLC](#). Law firm) and my ex, Gregory Knoop. Given the timing of the email and that I hadn't heard anything from them at all for weeks, I have to assume that it's not a coincidence. It is solely my opinion, but I have to believe Nisha is behind it. Anyway, they updated to let me know I'm still being investigated. Russell J. Williams lies repeatedly in open court to a judge, he abuses the procedures of the law and uses them to harass and intimidate me, and the Florida bar declines to discipline him in the least. That determination was made incredibly swiftly, within a number of weeks. I'm getting harassed and tormented by two members of their bar for months, and now I'm the one being investigated. The complaints against me have been pending since the spring. The double standard that is being applied to me is maddening. And the fact that there's obviously a LOT going on behind the scenes that I'm not privy to is incredibly upsetting. This is ya world we live in. It's 2018, and young female attorneys are held to an entirely different standard than the Old White Males. It may cost me my bar license to keep writing publicly about the state of this field, but I don't feel I have any other choice. Sitting down and shutting up and staying silent about how

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choice. Sitting down and shutting up and staying silent about how #sexualassaultsurvivors are treated by this profession is just not something I'm able to do. Coincidentally, today is the 3 year anniversary of the day I found out I passed the bar and would become a lawyer. I'm saddened to think that might not be the case for much longer, but I can't stay in a profession that tolerates this sort of treatment of women. #metoo #timesup #believesurvivors #womensrights #humanrights #enddomesticviolence #endsexualassault #endviolenceagainstwomen



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Ashley Krapacs

#gooddeeds #beahelper

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Ashley Krapacs shared Ashley Ann Krapacs, PLLC's post.

November 29 · 🌐

...

So this bully (and his attorney Law Office of Nisha E. Bacchus, P.A.) informed my attorney that they'll withdraw their bullshit lawsuit if I stop posting about them and if I remove all my previous posts. Last time I did that, though, they not only didn't follow through with their promise to withdraw the suit, they increased their threats and attacks against me tenfold, including a very scary threat to have me arrested even though I've done nothing illegal. In the meantime, as they've exhausted their entire bag of tricks, I've only gotten stronger and more resilient. So, sorry I'm not sorry, but my silence isn't up for sale, and it's certainly not free. As long as the litigation continues, I look forward to embarrassing both of these bullies as I lay the paper trail that clearly demonstrates what side of history these two attorneys are on. And hint: it's not the good side! #w... See More



Ashley Ann Krapacs, PLLC

November 29 · 🌐

#tbt to the time that Russell J. Williams of Williams, Hilal, Wigand & Grande, PLLC. law firm wrote to the Florida Bar about me and demanded that they "reign her in, and have her me... Continue Reading



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Ashley Krapacs shared AttorneyProblems's post.

November 25 · 🌐

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**Ashley Krapacs**

Dec 5, 2018

At some point in all this drama, when I was stressing about the Florida Bar complaints, @mln5663 reminded me that despite the attacks I've suffered from bullies like Nisha Bacchus and Russell J. Williams, one of the things they can never take is my J.D. So when I was going through my storage unit the other day and saw these bad boys, I brought them with me to what is now my third home in two months. The last several weeks, it's been easier than ever to keep fighting this battle, and this week, I got some unsavory information about Nisha Bacchus that is a total game changer. Stay tuned for that. But just another reminder that as long as you stay strong and stay the course, the tide will eventually turn. [@cumlaude](#) [#gratitude](#) [#womensrights](#) [#equalrights](#) [#humanrights](#) [#endsexism](#) [#endviolenceagainstwomen](#) [#domesticviolence](#) [#believesurvivors](#) [#staystrong](#) [#justkeepgoing](#)

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ashleykrapacs At some point in all this drama, when I was stressing about the Florida Bar complaints, [@mln5663](#) reminded me that despite the attacks I've suffered from bullies like Nisha Bacchus and Russell J. Williams, one of the things they can never take is my J.D. So when I was going through my storage unit the other day and saw these bad boys, I brought them with me to what is now my third home in two months. The last several weeks, it's been easier than ever to keep fighting this battle, and this week, I got some unsavory information about Nisha Bacchus that is a total game changer. Stay tuned for that. But just another reminder that as long as you stay strong and stay the course, the tide will eventually turn. 🙏 [#cumlaude](#) [#gratitude](#) [#womensrights](#) [#equalrights](#) [#humanrights](#) [#endsexism](#) [#endviolenceagainstwomen](#) [#domesticviolence](#) [#believesurvivors](#) [#staystrong](#) [#justkeepgoing](#)

DECEMBER 6, 2018





11. All documents and records in Defendant's possession that support Defendant's contention that she was sexually assaulted by Gregory Knoop.

12. All documents and records in Defendant's possession that support Defendant's contention that Knoop was suicidal during their relationship.

13. All documents and records in Defendant's possession that support Defendant's contention that Knoop implied that he would kill himself if Defendant did not date her.

14. All documents and records in Defendant's possession that support Defendant's contention that Defendant is a survivor of childhood abuse.

15. All documents in possession of the Defendant that evidence the death of her father.

3

16. All documents and records in Defendant's possession that support Defendant's contention that Defendant had no choice but to continue to correspond with Gregory Knoop.



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**ashleykrapacs** Nisha Bacchus filed a "Request to Produce" in the defamation case against me. She's requesting that I provide her with sixty line items worth of materials, most of which she already has access to. Most of the line items are completely irrelevant, will not help her case in any way, and are clearly meant to do nothing more than overwhelm me and trigger the extreme loss and trauma I've already suffered for over a year now.

Case in point: she asks for, "All documents in possession of the Defendant that evidence the death of her father." My father's death has no relevance to her case whatsoever, but she did use his death to her advantage when she chose to file suit against me just a few weeks after he died. This woman is a sick, twisted piece of trash. People who are secure and intelligent and competent don't need to kick their opponents when they're down. They don't need to harass and torment and torture their opponents when they're in their weakest moments. But apparently Nisha Bacchus does.

Fortunately for me, I've been able to pull together enough support and resources this year so that I'm still surviving (although not thriving). So instead of decimating me, as these tactics are intended to do, I continue to suffer the blows, but I rise up and gain more strength each and every time I'm attacked. However, my heart breaks for those who don't have the support and resources and coping skills that I've been able to cultivate. These tactics do nothing but keep those who are powerless and vulnerable stuck, while they make greedy, evil people like Nisha Bacchus rich. (How's that BMW treating you, baby?) This is bigger than domestic violence and sexual assault. It's about the fact that predators like Nisha Bacchus who make a living off of attacking innocent, powerless people need to be held accountable. Enough is enough.

So, I'm going to produce. Oh, I'm gonna produce the fuck out of this request. I'll be posting all the materials publicly so that anyone who wants to see the real Nisha Bacchus (and the real Russell J. Williams of Williams, Hital, Wigand & Grande, PLLC. law firm) will have 100% full, complete access. Game on.

Here's my dad's obituary.

[#womensright](#)

DECEMBER 19, 2018



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Ashley Krapacs

Dec 19, 2018

Bacchus Law Firm is at it again! Nisha Bacchus filed a "Request to Produce" in the defamation case against me. She's requesting that I provide her with sixty line items worth of materials, most of which she already has access to. Most of the line items are completely irrelevant, will not help her case in any way, and are clearly meant to do nothing more than overwhelm me and trigger the extreme loss and trauma I've already suffered for over a year now.

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Here's my dad's obituary.

#womensrights #equalrights #endviolenceagainstwomen #strength  
#resilience #nevergiveup #justkeepgoing

<http://www.tribtoday.com/obituaries/2018/09/ambrose-krapacs-1955-2018/>

Added 1 media to this post.

the De



Ashley Ann Krapacs, PLLC

Dec 19, 2018

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<http://www.tribtoday.com/obituaries/2018/09/ambrose-krapacs-1955-2018/>

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Ashley Krapacs

weird, and also please hold my bag while I go burn my apartment down.

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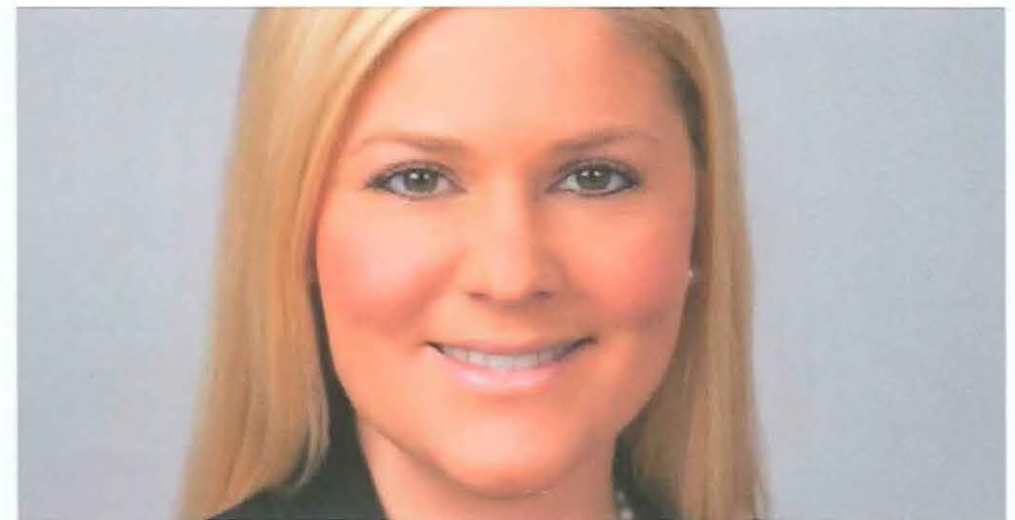


Ashley Krapacs

December 23 at 1:12 PM · 🌐



Nisha Bacchus of **Bacchus Law Firm** and Russell J. Williams of **Williams Hilal Wigand Grande law** requested that I produce, so I'm producing! YouTube channel is back online, folks. Enjoy! **#womensrights #equalrights #humanrights #endviolenceagainstwomen #enddomesticviolence #believesurvivors #power #strength #resilience**



YOUTUBE.COM

Ashley Krapacs

Domestic violence survivor. Lawyer. Writer. Advocate. Feminist. Coach. As...

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**Ashley Krapacs**

Jan 4 at 3:08 PM

Manna from heaven! Check out the Broward County Public Records database and read about how Nisha Bacchus of [Bacchus Law Firm](#) ripped off a vulnerable divorce client and screwed her over. This brave woman was strong enough to hold Nisha accountable for her actions and sued her in small claims last month. I need to connect with as many former clients as Nisha as possible, because I have strong reason to believe this is a pattern of Nisha's, and I'm sure as heck not gonna rest until I investigate it fully. Florida friends, please ask around if you might know anyone who has been represented by Nisha. She claims to practice most areas of law, but seems to prey in particular on females going through divorces. #womensrights #equalrights #humanrights #bullies #enddomesticviolence #endviolenceagainstwomen

■ Added a share preview to this post

**Ashley Krapacs**

Yesterday at 1:55 PM

Manna from heaven! Check out the Broward County Public Records database and read about how a former client of [Bacchus Law Firm](#) sued Nisha Bacchus! I'm trying to connect with as many former clients as Nisha as possible, because I have strong reason to believe this is a pattern of Nisha's, and I'm sure as heck not gonna rest until I investigate it fully. Florida friends, please ask around if you might know anyone who has been represented by Nisha. She claims to practice most areas of law, but seems to favor females going through divorces. #womensrights #equalrights #humanrights #bullies #enddomesticviolence #endviolenceagainstwomen

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**Ashley Ann Krapacs, PLLC**

Jan 4 at 2:57 PM

So, I had the idea to run Nisha Bacchus's name through the court's website ([www.browardclerk.org](http://www.browardclerk.org)) and discovered that a former client of [Bacchus Law Firm](#) who was ripped off and screwed over by Nisha sued Nisha last month to get the retainer back. Nisha took the woman's money and then disappeared. Shocking! And I know for a fact this client of Nisha's is not alone. I'm trying to connect with as many former clients of Nisha's as possible, so Florida friends, please ask around. Nisha claims to do basically all areas of law, but she seems to prey on females in divorce cases in particular. #womensrights #humanrights #equalrights #enddomesticviolence #endviolenceagainstwomen



**Ashley Ann Krapacs, PLLC**

Yesterday at 1:50 PM

So, I had the idea to run Nisha Bacchus's name through the court's website ([www.browardclerk.org](http://www.browardclerk.org)) and discovered that a former client of [Bacchus Law Firm](#) sued Nisha last month to get the retainer back. I know for a fact this client of Nisha's is not alone. I'm trying to connect with as many former clients of Nisha's as possible, so Florida friends, please ask around. Nisha practices basically all areas of law, but females in divorce cases seem to be her favorite. #womensrights #humanrights #equalrights #enddomesticviolence #endviolenceagainstwomen



**Ashley Ann Krapacs, PLLC**

Yesterday at 1:53 PM

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## EXHIBIT G

RE: Williams v. Krapacs - Message (Plain Text)

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To Manager  
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Move

Assign Policy

Mark UnreadCategorizeFollow Up

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LR

Lazarus, Randi <rlazarus@floridabar.org>Nisha Bacchus, Esq.; Sum, Alice; Casco, Maria; Russell Williams

RE: Williams v. Krapacs

You replied to this message on 1/7/2019 4:26 PM.

Mon 4:19 PM

I am in receipt of the below. I am sorry that you are experiencing this unpleasantness.  
If you perceive the identification of your vehicle as criminal in nature, you should contact law enforcement.  
Thank you.

---

Randi Klayman Lazarus  
Lead Attorney/Fort Lauderdale Branch  
The Florida Bar  
Lakeshore Plaza II, Suite 130  
[Sunrise, FL 33323](http://Sunrise, FL 33323)  
954-835-0233  
[rlazarus@floridabar.org](mailto:rlazarus@floridabar.org)

-----Original Message-----  
From: Nisha Bacchus, Esq. <[nisha@bnlawgroup.com](mailto:nisha@bnlawgroup.com)>  
Sent: Monday, January 07, 2019 3:14 PM  
To: Lazarus, Randi <[rlazarus@floridabar.org](mailto:rlazarus@floridabar.org)>; Sum, Alice <[asum@fowler-white.com](mailto:asum@fowler-white.com)>; Casco, Maria <[mcasco@floridabar.org](mailto:mcasco@floridabar.org)>  
Cc: Russell Williams <[rjwesquire1@gmail.com](mailto:rjwesquire1@gmail.com)>  
Subject: FW: Williams v. Krapacs

Good afternoon and Happy New Year Ms. Lazarus and Ms. Sum:

Please see the email and attachment that was sent to Ms. Krapacs' attorney, Ms. Acosta, this afternoon. I do not need to be a target of this litigation as I am well within my duty of representing a client, Mr. Williams. Ms. Krapacs has unfairly launched numerous attacks against myself and my firm throughout this process. She even drafted a posting regarding the type of vehicle I drive, which makes me very uncomfortable. I am hopeful that the Bar will take action as soon as reasonably possible. Ms. Krapacs' behaviors are alarming and unsound. I appreciate any immediate assistance that the Bar give.

Sincerely,

Nisha E. Bacchus, Esq.

Bacchus Law Firm  
401 E Las Olas Blvd, Suite 1400  
Fort Lauderdale, FL 33301  
Office: (954) 500-5555  
Fax: (954) 252-3911  
Website: [www.LitigationSouthFlorida.com](http://www.LitigationSouthFlorida.com)

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**Ashley Krapacs, Esq.**

Sexual Harassment Attorney

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**Ashley Krapacs, Esq.** • 2nd

Sexual Harassment Attorney

2w



Nisha Bacchus of Bacchus Law Firm and Russell J. Williams of Williams Hilal Wigand Grande law requested that I produce, so I'm producing! YouTube channel is back online, folks. Enjoy! [#womensrights](#) [#equalrights](#) [#humanrights](#) [#endviolenceagainstwomen](#) [#enddomesticviolence](#) [#believesurvivors](#) [#power](#) [#strength](#) [#resilience](#)



**Ashley Krapacs**

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Sexual Harassment Attorney

3w

...

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Case in point: she asks for, "All documents in possession of the Defendant that evidence the death of her father." My father's death has no relevance to her case whatsoever, but she did use his death to her advantage when she chose to file suit against me just a few weeks after he died. People who are secure and intelligent and competent don't need to kick their opponents when they're down.

Fortunately for me, I've been able to pull together enough support and resources this year so that I'm still surviving. I continue to suffer the blows, but I rise up and gain more strength each and every time. My heart breaks for those who don't have the support and resources and coping skills that I've been able to cultivate.

So, I'm going to produce. I'll be posting all the materials publicly so that anyone who wants to see the real Nisha Bacchus (and the real Russell J. Williams) will have 100% full, complete access. Game on.

Here's my dad's obituary.

[#womensrights](#) [#equalrights](#) [#strength](#) [#resilience](#) [#nevergiveup](#) [#justkeepgoing](#)

# Tribune Chronicle

Ambrose Krapacs 1955-2018

[tribtoday.com](#)



**Ashley Krapacs, Esq.**Sexual Harassment  
Attorney[View full profile](#)[+ Follow](#)

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**Ashley Krapacs, Esq.** • 2ndSexual Harassment Attorney  
3mo

Hurling threats and abuse against vulnerable sexual assault survivors until they are beaten down into silence is not a legitimate legal tactic. Yet this conduct goes on every day. This is the approach that Russell J. Williams of Williams Hilal Wigand Grande law firm used against me when I filed for a restraining order against my violent ex-boyfriend. When I questioned Mr. Williams's tactics and spoke publicly about them, he sued me.

You can't have your cake and eat it, too. You want to abuse sexual assault survivors and re-traumatize them so that you can achieve a certain result in a case? Fine. But you're not entitled to confidentiality regarding the legal tactics you choose to utilize.

Not only did he and his attorney, [LAW OFFICE OF NISHA E. BACCHUS, P.A.](#), file a frivolous lawsuit against me, they did so mere weeks after my father died. The vicious attacks that go on in this world are appalling.

They've have been harassing and tormenting and trying to silence me for months. But it won't work. I won't stop fighting. But I can't do it alone. Please consider contributing to my legal defense fund. Together, we'll make sure survivors won't have to suffer in silence any longer. [#metoo](#) [#timesup](#) [#believesurvivors](#) [#womensrights](#) [#equalrights](#) [#endrapeculture](#)

Abolitionist, attorney, judge, and feminist

"I ask no favors for my sex...

All I ask of our brethren is that  
they will take their feet from off  
our necks, and permit us to stand  
upright on that ground which God

Click here to support Sexual Assault Survivor Sued organized by Ashley Krapacs  
[gofundme.com](#)



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Ashley Krapacs, Esq.

Sexual Harassment  
Attorney

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Sexual Harassment Attorney  
2mo



Case Update: my rockstar attorney was able to get the defamation case unsealed, so it's now properly appearing in the public record. If you go to [www.browardclerk.org](http://www.browardclerk.org) and conduct a "Case Search" for my name, it should appear. And you can read in my Motion for Summary Judgment why Russell J. Williams of Williams Hilal Wigand Grande law firm was so butt hurt and determined to have the case sealed. But it doesn't work like that. You can't sue someone in civil court and then expect confidentiality.

When I was interviewing attorneys, every single one said to me, point blank, "Cases don't just disappear like that. There's no way that happened." Well, it did! [LAW OFFICE OF NISHA E. BACCHUS, P.A.](#) was able to have the case ILLEGALLY sealed for weeks. And to top it up, I just found out that while the case was sealed (and while I was effectively boxed out of access and participation in the case), she filed several things and provided me with absolutely no notice, even though I'm listed in the court's e-service system. No idea where this lunatic went to law school, but it must have been a school that doesn't put a whole lot of emphasis on, ya know, THE LAW. [#dueprocess](#) [#metoo](#) [#timesup](#) [#bullies](#) [#womensrights](#) [#equalrights](#) [#endviolenceagainstwomen](#) [#endrapeculture](#) [#endthepatriarchy](#)



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**Ashley Krapacs, Esq.**

Sexual Harassment  
Attorney

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**Ashley Krapacs, Esq.** • 2nd

Sexual Harassment Attorney  
2mo

...

Ya'll, I just can't with this diva. SIMPLY CANNOT! [LAW OFFICE OF NISHA E. BACCHUS, P.A.](#) tells my attorney today that she's going to sue me (more) for my recent posts about her. Apparently, she's gone through all the contents of her Bag of Tricks to Mindfuck Sexual Assault Survivors, and now she has to keep reusing the contents. She's already tried using her personal connections at the Florida Bar to silence me. Didn't work. She tried using her connections at the court to silence me. Didn't work. She and her client, Russell J. Williams of Williams, Hital, Wigand & Grande law firm, even threatened to use personal connections at the state's attorney office to have me arrested. Even then, I refused to be silenced. This lady is OUT OF CONTROL. Nothing but an evil bully. Bring it, diva. NOTHING they can do to me is going to silence me from speaking the truth about what people like Nisha Bacchus and Russell J. Williams do to vulnerable [#sexualassaultsurvivors](#). [#metoo](#) [#timesup](#) [#womensrights](#) [#believesurvivors](#) [#humanrights](#) [#enoughisenough](#)

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**Ashley Krapacs, Esq.**

Sexual Harassment  
Attorney

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**Ashley Krapacs, Esq.** • 2nd

Sexual Harassment Attorney  
2mo • Edited

...

I heard from the Florida Bar today regarding the many ethics complaints that have been filed against me by Russell J. Williams (partner at Williams, Hilal, Wigand & Grande Law Firm) and my ex. Given the timing of the email, I have to assume that it's not a coincidence. It's solely my opinion, but I have to believe [LAW OFFICE OF NISHA E. BACCHUS, P.A.](#) is behind it. They updated to let me know I'm still being investigated. Russell J. Williams lies repeatedly in open court to a judge, abuses the procedures of the law and uses them to harass and intimidate me, and the Florida bar declines to discipline him. I'm getting harassed and tormented by two members of their bar for months, and now I'm the one being investigated. The double standard being applied to me is maddening. The fact that there's obviously a LOT going on behind the scenes that I'm not privy to is incredibly upsetting. It's 2018, and young female attorneys are held to an entirely different standard than the Old White Males. It may cost me my bar license to keep writing publicly about the state of this field, but I don't have a choice. Staying silent about how [#sexualassaultsurvivors](#) are treated by this profession is just not something I'm able to do. [#metoo](#) [#timesup](#) [#believesurvivors](#) [#womensrights](#) [#enddomesticviolence](#)

23 Likes • 3 Comments



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IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,  
IN AND FOR BROWARD COUNTY, FLORIDA

Case No.: DVCE 19-000341

Division: 63

LAW OFFICE OF NISHA E. BACCHUS AND NISHA E. BACCHUS

Petitioner,

and

ASHLEY ANN KRAPACS, PLLC AND ASHLEY ANN KRAPACS

Respondent.

## TEMPORARY INJUNCTION FOR PROTECTION AGAINST STALKING

The Petition for Injunction for Protection Against Stalking under Section 784.0485, Florida Statutes, and other papers filed in this Court have been reviewed. Under the laws of Florida, the Court has jurisdiction of the Petitioner and the subject matter, and has jurisdiction of the Respondent upon service of the temporary injunction. The term Petitioner as used in this injunction includes the person on whose behalf this injunction is entered.

**It is intended that this protection order meet the requirements of 18 U.S.C. Section 2265 and therefore intended that it be accorded full faith and credit by the court of another state or Indian tribe and enforced as if it were the order of the enforcing state or of the Indian tribe.**

### SECTION I. NOTICE OF HEARING

Because this Temporary Injunction for Protection Against Stalking has been issued without notice to Respondent, Petitioner and Respondent are instructed that they are scheduled to appear and testify at a hearing regarding this matter on {date} 1/23/19, at 10:00 AM a.m./p.m., when the Court will consider whether it should issue a Final Judgment of Injunction for Protection Against Stalking, which shall remain in effect until modified or dissolved by the Court, and whether other things should be ordered. The hearing will be before The Honorable {name} S. MOON, at the following address: Room 10155, 201 SE 6<sup>th</sup> St., Fort Lauderdale, Florida. If Petitioner and/or Respondent do not appear, this temporary injunction may be continued in force, extended, or dismissed, and/or additional orders may be granted, including entry of a permanent injunction and the imposition of court costs. All witnesses and evidence, if any, must be presented at this time. **Petitioner and Respondent will be bound by the terms of any injunction or order issued at the final hearing.**

**IF EITHER PETITIONER OR RESPONDENT DO NOT APPEAR AT THE FINAL HEARING, HE OR SHE WILL BE BOUND BY THE TERMS OF ANY INJUNCTION OR ORDER ISSUED IN THIS MATTER.**

NOTICE: Because this is a civil case, there is no requirement that these proceedings be transcribed at public expense.

YOU ARE ADVISED THAT IN THIS COURT:

a. \_\_\_\_\_ a court reporter is provided by the court.

b.   X   electronic recording only is provided by the court. A party may arrange in advance for the services of and provide for a court reporter to prepare a written transcript of the proceedings at that party's expense.

A RECORD, WHICH INCLUDES A TRANSCRIPT, MAY BE REQUIRED TO SUPPORT AN APPEAL. THE PARTY SEEKING THE APPEAL IS RESPONSIBLE FOR HAVING THE TRANSCRIPT PREPARED BY A COURT REPORTER. THE TRANSCRIPT MUST BE FILED WITH THE REVIEWING COURT OR THE APPEAL MAY BE DENIED.

**If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact A.D.A. Coordinator, Rm. 20140, 201 SE 6<sup>th</sup> St., Ft. Lauderdale, (954) 831-7721 *{identify applicable court personnel by name, address, and telephone number}* at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.**

## **SECTION II. FINDINGS**

The statements made under oath by Petitioner make it appear that Section 784.0485, Florida Statutes, applies to the parties, and that stalking exists.

## **SECTION III. TEMPORARY INJUNCTION AND TERMS**

This injunction shall be in effect until the hearing set above and in no event for longer than 15 days, unless extended by court order. If a final order of injunction is issued, the terms of this temporary injunction will be extended until service of the final injunction is effected upon Respondent. This injunction is valid and enforceable in all counties of the State of Florida. The terms of this injunction may not be changed by either party alone or by both parties together. Only the Court may modify the terms of this injunction. Either party may ask the Court to change or end this injunction.

Willful violation of the terms of this injunction, such as: committing an act of stalking against Petitioner; going to or being within 500 feet of Petitioner's residence, place of employment, school, or other place prohibited in this injunction; knowingly and intentionally coming within 100 feet of Petitioner's motor vehicle, whether or not that vehicle is occupied; committing any other violation of this injunction through an intentional unlawful threat, word or act to do violence to Petitioner; telephoning, contacting or communicating with Petitioner, unless indirect contact through a third party is specifically allowed by this injunction; defacing or destroying Petitioner's personal property, including Petitioner's motor vehicle; or refusing to surrender firearms or ammunition if ordered to so by the Court, constitutes a misdemeanor of the first degree punishable as provided by Sections 775.082 and 775.083, Florida Statutes.

Any party violating this injunction may be subject to civil or indirect criminal contempt proceedings, including the imposition of a fine or imprisonment, and also may be charged with a crime punishable by a fine, jail, or both, as provided by Florida Statutes.

**ORDERED and ADJUDGED:**

1. **Prohibited Actions.** Respondent shall not commit, or cause any other person to commit, any acts of stalking against Petitioner, including stalking, cyberstalking, aggravated stalking, or any criminal offense resulting in physical injury or death. Respondent shall not commit any other violation of this injunction through an intentional unlawful threat, word, or act to do violence to Petitioner.

2. **No Contact.** Respondent shall have no contact with the Petitioner unless otherwise provided in this section.

a. Unless otherwise provided herein, Respondent shall have **no** contact with Petitioner. Respondent shall not directly or indirectly contact Petitioner in person, by mail, e-mail, fax, telephone, through another person, or in any other manner, including any electronic means or use of social media. Further, Respondent shall not contact or have any third party contact anyone connected with Petitioner's employment or school to inquire about Petitioner or to send any messages to Petitioner. Unless otherwise provided herein, **Respondent shall not go to, in, or within 500 feet of:**

b. Petitioner's current residence *{list address}* Wherever Petitioner resides in Florida  
\_\_\_\_\_  
or any residence to which Petitioner may move;

c. Petitioner's current or any subsequent place of employment *{list address of current employment}* 401 E. Las Olas Blvd., Ste. 1400 Ft. Lauderdale  
\_\_\_\_\_

d. where Petitioner attends school *{list address of school}* \_\_\_\_\_; or

e. the following other places (if requested by Petitioner) where Petitioner, specific members of Petitioner's family, or individuals closely associated with Petitioner, regularly frequent: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

f. Respondent **shall not** knowingly and intentionally come within 100 feet of Petitioner's motor vehicle at any time, whether or not that vehicle is occupied;

g. Other provisions regarding contact: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

3. **Firearms.**

*{Initial all that apply; write N/A if not applicable}*

a. N/A Respondent is a state or local officer, as defined in section 943.10(14), Florida Statutes, who holds an active certification, who receives or possesses a firearm or ammunition for use in performing official duties on behalf of the officer's employing agency, and is not prohibited by the court from having in his or her care, possession, or control any firearm or ammunition.

b. X Respondent shall not use or possess a firearm or ammunition.

c. X Respondent shall surrender any firearms and ammunition in the Respondent's possession to the Broward County Sheriff's Department.

d. X Other directives relating to firearms and ammunition: Respondent must immediately surrender any concealed weapons permits to Broward County Sheriff's Department or other Local law enforcement official.

4. **Mailing Address or Designated E-Mail Address(es).** Respondent shall notify the Clerk of the Court of any change in either his or her mailing address or designated e-mail address(es) within 10 days of the change. All further papers (excluding pleadings requiring personal service) shall be served either by mail to Respondent's last known mailing address or by e-mail to Respondent's designated e-mail address(es). Service shall be complete upon mailing or e-mailing.

5. **Additional order(s) necessary to protect Petitioner from stalking:**

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6. **Referral to Appropriate Services for Petitioner:**

Petitioner may contact the following services as needed:

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**SECTION IV. OTHER SPECIAL PROVISIONS**

*{This section to be used for inclusion of local provisions approved by the chief judge as provided in Florida Family Law Rule 12.610.}*

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**SECTION V. DIRECTIONS TO LAW ENFORCEMENT OFFICER IN ENFORCING THIS INJUNCTION**

***{Unless ordered otherwise by the judge, all provisions in this injunction are considered mandatory provisions and should be interpreted as part of this injunction.}***

1. The Sheriff of Broward County, or any other authorized law enforcement officer, is ordered to serve this temporary injunction upon Respondent as soon as possible after its issuance.
2. **This injunction is valid and enforceable in all counties of the State of Florida.** Violation of this injunction should be reported to the appropriate law enforcement agency. Law enforcement officers of the jurisdiction in which a violation of this injunction occurs shall enforce the provisions of this injunction and are authorized to arrest without a warrant pursuant to Section 901.15, Florida Statutes, for any violation of its provisions, which constitutes a criminal act under Section 784.0487, Florida Statutes.
3. **THIS INJUNCTION IS ENFORCEABLE IN ALL COUNTIES OF FLORIDA AND LAW ENFORCEMENT OFFICERS MAY EFFECT ARRESTS PURSUANT TO SECTION 901.15(6), FLORIDA STATUTES.** The arresting agent shall notify the State Attorney's Office immediately after arrest.
4. **Reporting alleged violations.** If Respondent violates the terms of this injunction and has not been arrested, Petitioner may contact the clerk of the circuit court of the county in which the violation is alleged to have occurred. The clerk shall assist Petitioner in preparing an affidavit in support of reporting the violation or direct Petitioner to the office operated by the court that has been designated by the chief judge of that circuit as the central intake point for violations of injunctions for protection where Petitioner can receive assistance in the preparation of the affidavit in support of the violation. The affidavit shall be immediately forwarded by the office assisting Petitioner to the state attorney of that circuit and to the judge designated by the chief judge as the recipient of affidavits of violations of an injunction. Procedures relating to reporting alleged violations are governed by section 784.0487, Florida Statutes.

DONE AND ORDERED in Ft. Lauderdale, Broward County, Florida, on 1/11/19.

  
\_\_\_\_\_  
CIRCUIT JUDGE

**COPIES TO:**

Sheriff of Broward County

Petitioner (or his or her attorney):

\_\_\_\_\_ by U. S. Mail

\_\_\_\_\_ by hand delivery in open court

\_\_\_\_\_ by e-mail to a designated e-mail address

Respondent:

☒ forwarded to sheriff for service B80

☐ State Attorney's Office

☐ Other: \_\_\_\_\_

I CERTIFY the foregoing is a true copy of the original **Temporary Injunction for Protection Against Stalking** as it appears on file in the office of the Clerk of the Circuit Court of Broward County, Florida, and that I have furnished copies of this order as indicated above.

(SEAL)

CLERK OF THE CIRCUIT COURT

By: \_\_\_\_\_  
(Deputy Clerk or Judicial Assistant)



IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,  
IN AND FOR BROWARD COUNTY, FLORIDA

Case No.: DVCE 19-000341

Division: 63

LAW OFFICE OF NISHA E. BACCHUS AND NISHA E. BACCHUS,  
Petitioner,

and

ASHLEY ANN KRAPACS, PLLC AND ASHLEY ANN KRAPACS,  
Respondent.

ORDER

THIS CAUSE having come to be heard on PETITIONER'S PETITION FOR  
INJUNCTION FOR PROTECTION AGAINST STALKING

And the Court being otherwise advised in the Premises, it is hereupon,

ORDERED AND ADJUDGED as follows: The Injunction for Protection against Stalking  
entered in the instant case on 1/11/19 shall only apply to the individual Petitioner and  
Respondent and not their respective law firms, as such an Injunction can only protect individuals,  
not business entities.

DONE AND ORDERED in Chambers at Fort Lauderdale, Broward County, Florida this 11<sup>th</sup>

Day of January, 2019.

STATE OF FLORIDA  
BROWARD COUNTY

I HEREBY CERTIFY that the above and  
below is a true and correct copy of  
the original signed by my dates.

CIRCUIT COURT JUDGE

Copies Furnished: Respondent, Petitioner

CLERK OF CIRCUIT COURT  
JAN 14 2019  
CLERK OF CIRCUIT COURT

IN THE CIRCUIT COURT OF THE \_\_\_\_\_ 17TH \_\_\_\_\_ JUDICIAL CIRCUIT,  
IN AND FOR \_\_\_\_\_ BROWARD \_\_\_\_\_ COUNTY, FLORIDA

Case No: DVCE19-0341

Division: 63

NISHA E. BACCHUS

Petitioner,

and

ASHLEY ANN KRAPACS

Respondent,

**SUPPLEMENTAL AFFIDAVIT IN SUPPORT OF PETITION FOR  
INJUNCTION FOR PROTECTION AGAINST  
☐ DOMESTIC VIOLENCE ☐ REPEAT VIOLENCE  
☐ DATING VIOLENCE ☐ SEXUAL VIOLENCE ☒ STALKING**

I, {full legal name} NISHA E. BACCHUS, being sworn,  
certify that the following statements are true:  
{Please complete all paragraphs that relate to your case}

1. On {date} January 21 & 28, 2019, at {place and address} \_\_\_\_\_  
401 E Las Olas Blvd, Suite 1400, Fort Lauderdale, FL 33301

Respondent said or did the following things that hurt me or a member of my immediate family  
and made me afraid for my or my family member's safety:

On January 21, 2019, Respondent wrote an email to the Florida Bar stating, "Further, I'll be  
representing several of her former clients in various bar complaints and potential malpractice  
cases. ..." A copy of Respondent's email to the Florida Bar dated January 21, 2019 is attached  
hereto and incorporated herein as "Exhibit A."

To date, I have been sued in small claims court by Ms. Judith Mach (Broward County Case  
No. COWE18012462) and a Florida Bar complaint was also filed against me by Ms. Judith  
Mach. Respondent also sent a letter to the Florida Bar advising that she will be presenting Ms.  
Mach in the bar complaint against me free of charge. A copy of Respondent's letter to the  
Florida Bar and copy of her retainer agreement is attached hereto and incorporated herein as  
"Composite Exhibit B." Additionally, on January 28, 2019, Respondent also filed her Notice of  
Appearance to represent Ms. Mach in a fee hearing against my firm (Broward County Case  
No. FMCE17013496). A copy of Respondent's Notice of Appearance is attached hereto and  
incorporated herein as "Exhibit C."

☒ Please indicate here if you are attaching additional pages to continue these facts.

2. On {date} January 22, 2019, at {place and address} 401 E Las Olas Blvd, Suite 1400, Fort Lauderdale, FL 33301, the following event(s) took place: \_\_\_\_\_

On or about January 22, 2019, I discovered that Respondent had posted additional posting about myself and my law firm on her corporate Instagram page. A copy of the corporate Instagram postings are attached hereto and incorporated herein as "Composite Exhibit D."

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

☒ Please indicate here if you are attaching additional pages to continue these facts.

3. On {date} January 29, 2019, the following incidents of stalking occurred at the following locations: {the locations may include, but need not be limited to, a home, school, or place of employment} \_\_\_\_\_

On January 29, 2019, I received a copy of the police report from Detective Freeley. I met with Detective Freeley on or about January 4, 2019 to report all incidents of cyberstalking. A copy of the the police report is attached hereto and incorporated herein as "Exhibit E."

For cyberstalking, the following is a description of all evidence of contacts and/or threats made by Respondent in voice messages, texts, emails, or other electronic communication: \_\_\_\_\_

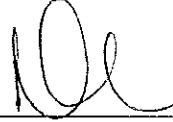
Respondent's email to the Florida Bar dated January 21, 2019; a copy of Respondent's Notice of Appearance; copies of the Respondent's corporate Instagram posting; and copy of police report.

☒ Please indicate here if you are attaching additional pages to continue these facts.

4. ☐ Please indicate here if you are attaching copies of medical records for treatment you may have received for injuries referred to in your petition or in this supplemental affidavit, copies of any police or sheriff reports concerning incidents of violence involving you and Respondent, or any notice of inmate release.

I understand that I am swearing or affirming under oath to the truthfulness of the claims made in this supplemental affidavit and that the punishment for knowingly making a false statement includes fines and/or imprisonment.

Dated: 1/29/2019



Signature of Petitioner

Printed Name: Nisha E. Bacchus

Address: 401 E Las Olas Blvd, Suite 1400

City, State, Zip Code: Fort Lauderdale, FL 33301

Telephone Number: 954-500-5555

Number: \_\_\_\_\_

E-Mail Address(es): \_\_\_\_\_

nisha@bnlawgroup.com

STATE OF FLORIDA

COUNTY OF BROWARD

Sworn to or affirmed and signed before me on 1/29/2019 by Nisha Bacchus.



Laura Valladares  
Commission # GG020984  
Expires: August 14, 2020  
Bonded thru Aaron Notary



NOTARY PUBLIC or DEPUTY CLERK

Laura Valladares

*(Print, type, or stamp commissioned name of notary or deputy clerk.)*

☒

Personally known

☐

Produced identification

Type of identification produced \_\_\_\_\_

## **EXHIBIT A**

**Nisha Bacchus, Esq.**

---

**From:** Lazarus, Randi <rlazarus@floridabar.org>  
**Sent:** Tuesday, January 22, 2019 10:51 AM  
**To:** Russell Williams; Nisha Bacchus, Esq.  
**Cc:** Casco, Maria; Sum, Alice; Ashley Krapacs  
**Subject:** FW: Bar Ethics Complaints Update/Krapacs

Please find below dated January 21, 2019 from Ms. Krapacs. Same is being forwarded to you, as you were not copied on the e-mail.

Thank you.

---

Randi Klayman Lazarus  
Lead Attorney/Fort Lauderdale Branch  
The Florida Bar  
Lakeshore Plaza II, Suite 130  
Sunrise, FL 33323  
954-835-0233  
[rlazarus@floridabar.org](mailto:rlazarus@floridabar.org)

**From:** Casco, Maria <mcasco@floridabar.org>  
**Sent:** Tuesday, January 22, 2019 8:23 AM  
**To:** Lazarus, Randi <rlazarus@floridabar.org>  
**Cc:** Sum, Alice <asum@fowler-white.com>  
**Subject:** FW: Bar Ethics Complaints Update

**From:** Ashley Krapacs <[krapacsaa@gmail.com](mailto:krapacsaa@gmail.com)>  
**Sent:** Monday, January 21, 2019 6:52 PM  
**To:** Sum, Alice <[asum@fowler-white.com](mailto:asum@fowler-white.com)>  
**Cc:** Casco, Maria <mcasco@floridabar.org>  
**Subject:** Bar Ethics Complaints Update

Good Evening Ms. Sum,

I just wanted to provide you with an update on my situation. Despite my best efforts to settle the defamation suit filed against me by Nisha Bacchus on behalf of Russell J. Williams, it is clear to me that amicable resolution is not possible. Every time I concede any ground and give my attorney the go-ahead to negotiate, Nisha's attacks against me escalate. At this point, I have serious concerns about her mental stability, and I really have no idea what she is capable of. As my attorney was attempting to negotiate a settlement, Nisha filed a domestic violence stalking injunction case against me (case #DVCE 19-000341). The petition is riddled with patently false information. Most concerning is that in every section where she is required (under oath) to disclose any related cases, she has indicated that there are none, even though the civil defamation case is still ongoing and forms the basis for everything I have posted.

For the time being, I have promised my attorney that I will not post anything on social media about my case. However, even though the proper channels (bar complaints, law enforcement, and the court system) have not been effective for me thus far, I will return to those in hopes that there will be some accountability. I will be filing a formal bar complaint against Nisha based on the inaccuracies in the injunction petition and the fact that it's clear she filed the case merely to

gain leverage in the civil defamation case. Further, I'll be representing several of her former clients in various bar complaints and potential malpractice cases. Because the judge did issue a temporary injunction in the domestic violence case based on the false information and exaggerations that Nisha provided in the petition, I will be waiting until after my Wednesday morning hearing to file anything to err on the side of caution. But I wanted to alert you know to what is going on. Filing a frivolous domestic violence stalking case for the sake of gaining an advantage in a separate civil case is a gross misuse of the judicial system, and I intend to hold her accountable through the proper channels. Please let me know if you require any additional information. Have a wonderful evening.

Best,

Ashley

--

--

Regards,

Ashley Ann Krapacs  
New York Bar #5389309  
Florida Bar #122407  
District of Columbia Bar #1045497  
[ashley@krapacslaw.com](mailto:ashley@krapacslaw.com)  
[www.krapacslaw.com](http://www.krapacslaw.com)  
[Follow me on Facebook!](#)  
[Follow me on Twitter!](#)  
[Connect on LinkedIn!](#)

Please note: Florida has very broad public records laws. Many written communications to or from The Florida Bar regarding Bar business may be considered public records, which must be made available to anyone upon request. Your e-mail communications may therefore be subject to public disclosure.

## **COMPOSITE EXHIBIT B**

**Received** Wed 01/23/2019 2:46PM  
**From** Ashley Ann Krapacs  
**Subject** Representation in Bar Complaint  
**To** ACAP Mail  
**cc**  
**bcc**

2019-01-23 Juith Mach Client Engagement Letter.pdf

Good Afternoon,

Please be advised that I have been retained to represent Ms. Judith Mach in the bar complaint that she filed against Ms. Nisha Bacchus on December 18, 2018. The letter of representation is attached. Ms. Bacchus has filed a domestic violence injunction of protection against me. The case is pending, and a full evidentiary hearing will be held on February 1. I am confident that there is no legal or factual basis for the injunction, but there is presently a temporary order of protection in place. I trust that you will be tactful in any communication that you have with Ms. Bacchus regarding this matter. Her attorney in the injunction matter is Ms. Joseph DiRuzzo. I have agreed to accept case information from him via email without there being a violation of the existing order of injunction, so I hope that he and his client will extend the same professional courtesy to me. His email address is [jd@diruzzolaw.com](mailto:jd@diruzzolaw.com). Please let me know if you require any additional information. Have a wonderful day.

Best,

Ashley

--

Ashley Ann Krapacs  
Ashley Ann Krapacs, PLLC  
New York Bar #5389309  
Florida Bar #122407  
District of Columbia Bar #1045497  
[ashley@krapacslaw.com](mailto:ashley@krapacslaw.com)  
[www.krapacslaw.com](http://www.krapacslaw.com)  
[Follow me on Facebook](#)  
[Follow me on Twitter](#)  
[Connect on LinkedIn](#)

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Please note: Florida has very broad public records laws. Many written communications to or from The Florida Bar regarding Bar business may be considered public records, which must be made available to anyone upon request. Your e-mail communications may therefore be subject to public disclosure.



Ashley Ann Krapacs, PLLC  
401 E. Las Olas Blvd. Suite 1400  
Fort Lauderdale, FL 33301  
Office: 754-200-9761  
Cell: 202-341-1509

## CLIENT ENGAGEMENT LETTER

January 23, 2019

Judith Mach

Re: Bar Complaint Case

Dear Judith:

The purpose of this letter is to confirm you that, based on our recent conversations, I, Ashley Ann Krapacs, will represent you in the matter regarding the Florida Bar Complaint that you filed against Nisha Bacchus. I will provide the following services: case research and drafting of any required responses or rebuttals. I have accepted this case pro bono, meaning there will be no cost to you for my legal services.

My expectations of you are: prompt responses to requests for information and truthfulness and candor in your communications to me so that I can fully develop a case strategy and anticipate any possible defenses or assertions from opposing counsel.

Your primary contact for this matter will be me, Ashley Ann Krapacs, 202-341-1509. If you have any questions about your case, you should contact me directly.

If you have any questions about this information, please let me know. I am happy to represent you in this matter.

Best,

*Ashley Ann Krapacs*

Ashley Ann Krapacs

## **EXHIBIT C**

**IN THE CIRCUIT COURT OF THE 17<sup>TH</sup> JUDICIAL CIRCUIT, IN AND FOR  
BROWARD COUNTY, FLORIDA**

**DAVID JOSEPH MACH**

**CASE NO.: FMCE17013496**

**DIVISION: 35**

**JUDGE FABIENNE FAHNESTOCK**

**Petitioner,**

**vs.**

**JUDITH MACH,**

**Respondent.**

**NOTICE OF APPEARANCE OF COUNSEL**

**PLEASE TAKE NOTICE** that Ashley Ann Krapacs, Esquire, hereby enters her appearance as counsel for Respondent Judith Mach and requests that copies of all pleadings, discovery, and other papers in this action be given to and served upon the undersigned at the address and telephone number set forth.

Ashley Ann Krapacs  
401 East Las Olas Blvd. Suite 1400  
Fort Lauderdale, FL 33301  
202-341-1509  
[Ashley@krapacslaw.com](mailto:Ashley@krapacslaw.com)

Dated: January 28, 2019

Respectfully Submitted,

/s/ Ashley Krapacs  
Ashley Ann Krapacs, Esq.  
401 East Las Olas Blvd. Suite 1400  
Fort Lauderdale, FL 33301  
Phone: 202-341-1509  
Bar Number: 122407  
Email: [ashley@krapacslaw.com](mailto:ashley@krapacslaw.com)

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 28<sup>th</sup> day of January, 2019, that the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

Respectfully submitted,

/s/ Ashley Krapacs  
Ashley Ann Krapacs, Esq.  
401 East Las Olas Blvd. Suite 1400  
Fort Lauderdale, FL 33301  
Phone: 202-341-1509  
Bar Number: 122407  
Email: [ashley@krapacslaw.com](mailto:ashley@krapacslaw.com)

### **SERVICE LIST**

Joseph DiRuzzo, on behalf of Nisha Bacchus, [jd@diruzzolaw.com](mailto:jd@diruzzolaw.com)  
Victor H Waite, [victor@vhwlaw.com](mailto:victor@vhwlaw.com)  
Ryanne N Seyba, [ryanne@seybalaw.com](mailto:ryanne@seybalaw.com)  
David L Hirschberg, [service@dhirschberglaw.com](mailto:service@dhirschberglaw.com)  
Gary Steven Maisel, [resolutions10@aol.com](mailto:resolutions10@aol.com)

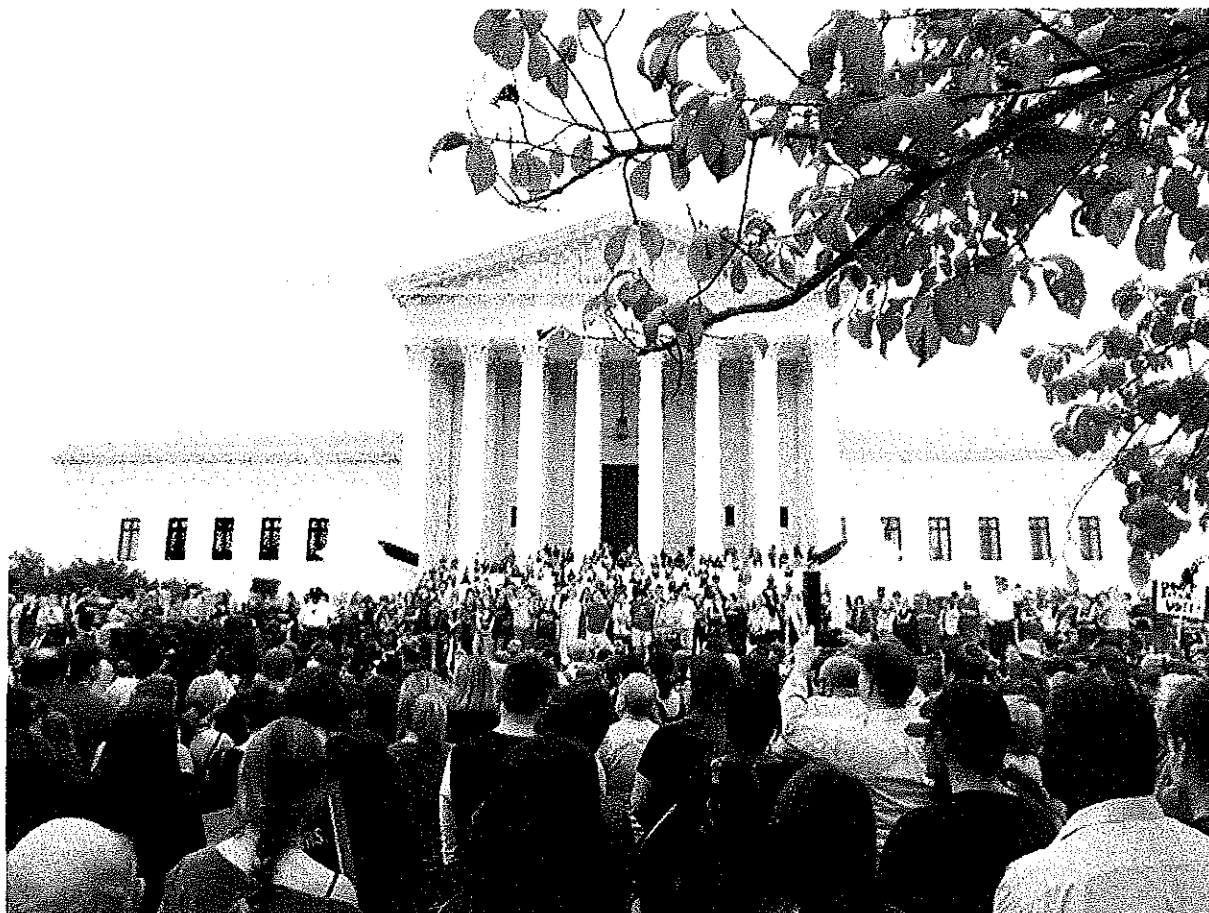
## **COMPOSITE EXHIBIT D**

No.  
I do not  
yield.

noidonotyield

Supreme Court of the United States

...



25 likes

**noidonotyield** I've spent the past 9 months being very careful about my social media, hiding my location out of fear that my vindictive, rapey ex would find me and harm me. I've lived in the shadows, constantly looking over my shoulder, paranoid and terrified, for the better part of a year.

Well, I'm done hiding. Fuck my ex and his battalion of lawyers. You want to hurt me, you want to keep fucking with me, bring it.

... ..





## Photo



fucking with me, bring it.

I'm in DC. I'm here for a wedding.

I spent the morning wandering around, feeling nostalgic yet right at home. I started walking towards the National Geographic building, thinking I'd spend the afternoon there. But then my feet carried me back to my hotel. Up to my room. I threw on my running clothes. And I set out.

On auto-pilot, I glided down 14th Street. When my feet hit the dirt and gravel surface of the National Mall, I turned left and started running towards the Capitol. The same route I ran regularly for basically a decade. But when I reached the Capitol, instead of turning around, without thinking, I kept heading east. Further and further. Up and around the north side of the Capitol, until I could hear the protesters.

I could hear them well before I could see them. I kept running towards the noise. And I came upon this scene. Thousands of activists protesting at the Supreme Court.

And I wept. I sobbed and sobbed. Overwhelmed, angry, relieved, exhausted.

I cried for me. I cried for us. I cried for the survivors. I cried for this country.

My body is mine. My life matters. My story matters. And FUCK anyone who says it doesn't.

Fuck Gregory Knoop.

Fuck Russell J. Williams.

Fuck Williams Hilal Wigand Grande law firm.

Fuck Nisha Bacchus.

Fuck Bacchus Law.

Fuck David Benowitz.

Fuck Seth Price.





## Photo



I could hear them well before I could see them. I kept running towards the noise. And I came upon this scene. Thousands of activists protesting at the Supreme Court.

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Fuck Russell J. Williams.

Fuck Williams Hilal Wigand Grande law firm.

Fuck Nisha Bacchus.

Fuck Bacchus Law.

Fuck David Benowitz.

Fuck Seth Price.

Fuck Price Benowitz law firm.

Fuck Kevin Tynan.

Fuck James Drakeley.

Fuck Kenneth Patterson.

Fuck Hiersche, Hayward, Drakeley & Urbach law firm.

Fuck everyone who perpetuates #rapeculture. Fuck everyone who perpetuates #misogyny. Fuck everyone who perpetuates violence against women.

You might get Kavanaugh. But you've waged a war that you cannot win. #Progress is coming whether you like it or not. And you will be held accountable. I will never stop fighting. #metoo #timesup

[View all 2 comments](#)

OCTOBER 6, 2018





Hurling **threats** and **abuse**  
against vulnerable sexual assault  
survivors until they are beaten  
down into silence is NOT a  
legitimate legal tactic.  
Lawyers who rely on strategies  
like this: **take heed.**  
You're about to get **exposed.**



14 likes

**noidonotyield** This sort of conduct goes on every day. This is the approach that Russell J. Williams of Williams, Hilal, Wigand & Grande law firm used against me when I filed for a restraining order against



YOU'RE ABOUT TO GET EXPOSED.



14 likes

**noidonotyield** This sort of conduct goes on every day. This is the approach that Russell J. Williams of Williams, Hilal, Wigand & Grande law firm used against me when I filed for a restraining order against my violent ex-boyfriend. When I questioned Mr. Williams's tactics and spoke publicly about them, he sued me.

You can't have your cake and eat it, too. You want to abuse sexual assault survivors and re-traumatize them so that you can achieve a certain result in a case? Fine. But you're not entitled to confidentiality regarding the legal tactics you choose to utilize.

Not only did he and his attorney, Nisha Bacchus, file a frivolous lawsuit against me, they did so mere weeks after my father died. The vicious attacks that go on in this world are appalling.

They've been harassing and tormenting and trying to silence me for months. But it won't work. I won't stop fighting. But I can't do it alone. Please consider contributing to my legal defense fund, if you have not already done so. Together, we'll make sure survivors won't have to suffer in silence any longer. Link is in bio. #metoo #timesup #believesurvivors #womensrights #equalrights #endrapeculture

OCTOBER 12, 2018





No.  
I do not  
yield.

noidonotyield

...

11. All documents and records in Defendant's possession that support Defendant's contention that she was sexually assaulted by Gregory Knoop.
12. All documents and records in Defendant's possession that support Defendant's contention that Knoop was suicidal during their relationship.
13. All documents and records in Defendant's possession that support Defendant's contention that Knoop implied that he would kill himself if Defendant did not date her.
14. All documents and records in Defendant's possession that support Defendant's contention that Defendant is a survivor of childhood abuse.
15. All documents in possession of the Defendant that evidence the death of her father.

1

16. All documents and records in Defendant's possession that support Defendant's contention that Defendant had no choice but to continue to correspond with Gregory Knoop.



3 likes

**noidonotyield** Nisha Bacchus filed a "Request to Produce" in the defamation case against me. She's requesting that I provide her with sixty line items worth of materials, most of which she already has access to. Most of the line items are completely irrelevant, will not help her case in any way, and are clearly meant to do nothing more than overwhelm me and trigger the extreme loss and trauma I've already suffered for over a year now.

Case in point: she asks for, "All documents in possession of the Defendant that evidence the death of her father." My father's death has no relevance to her case whatsoever but she did use his death to her



Case in point: she asks for, "All documents in possession of the Defendant that evidence the death of her father." My father's death has no relevance to her case whatsoever, but she did use his death to her advantage when she chose to file suit against me just a few weeks after he died. This woman is a sick, twisted piece of trash. People who are secure and intelligent and competent don't need to kick their opponents when they're down. They don't need to harass and torment and torture their opponents when they're in their weakest moments. But apparently Nisha Bacchus does.

Fortunately for me, I've been able to pull together enough support and resources this year so that I'm still surviving (although not thriving). So instead of decimating me, as these tactics are intended to do, I continue to suffer the blows, but I rise up and gain more strength each and every time I'm attacked. However, my heart breaks for those who don't have the support and resources and coping skills that I've been able to cultivate. These tactics do nothing but keep those who are powerless and vulnerable stuck, while they make greedy, evil people like Nisha Bacchus rich. (How's that BMW treating you, baby?) This is bigger than domestic violence and sexual assault. It's about the fact that predators like Nisha Bacchus who make a living off of attacking innocent, powerless people need to be held accountable. Enough is enough.

So, I'm going to produce. Oh, I'm gonna produce the fuck out of this request. I'll be posting all the materials publicly so that anyone who wants to see





## Photo



harass and torment and torture their opponents when they're in their weakest moments. But apparently Nisha Bacchus does.

Fortunately for me, I've been able to pull together enough support and resources this year so that I'm still surviving (although not thriving). So instead of decimating me, as these tactics are intended to do, I continue to suffer the blows, but I rise up and gain more strength each and every time I'm attacked. However, my heart breaks for those who don't have the support and resources and coping skills that I've been able to cultivate. These tactics do nothing but keep those who are powerless and vulnerable stuck, while they make greedy, evil people like Nisha Bacchus rich. (How's that BMW treating you, baby?) This is bigger than domestic violence and sexual assault. It's about the fact that predators like Nisha Bacchus who make a living off of attacking innocent, powerless people need to be held accountable. Enough is enough.

So, I'm going to produce. Oh, I'm gonna produce the fuck out of this request. I'll be posting all the materials publicly so that anyone who wants to see the real Nisha Bacchus (and the real Russell J. Williams of Williams, Hilal, Wigand & Grande, PLLC. law firm) will have 100% full, complete access. Game on.

Here's my dad's obituary.  
#womensright

DECEMBER 19, 2018



## **EXHIBIT E**

IDENT DATA

# INCIDENT/INVESTIGATION REPORT

*Ft Lauderdale Police Department*

Case # 34-1901-005968

Status Codes L = Lost S = Stolen R = Recovered D = Damaged Z = Seized B = Burned C = Counterfeit / Forged F = Found						
D R U G S	UCR	Status	Quantity	Type Measure	Suspected Type	Up to 3 types of activity

Assisting Officers

Suspect Hate / Bias Motivated: *None*

NARRATIVE

# REPORTING OFFICER NARRATIVE

*Ft Lauderdale Police Department*

Victim	Offense <i>INFORMATION</i>	OCA <i>34-1901-005968</i> Date / Time Reported <i>Fri 01/11/2019 00:00</i>
--------	-------------------------------	---

On 01/10/2019 Detective Freeley was contacted by the owner of the BACCHUS Law Firm, Ms. Nisha Bacchus. Ms. Bacchus advised that she was being Cyber Stocked by Attorney, Ms. Ashley Krapacs.

On 01/11/2019 Detective Freeley contacted Ms. Bacchus at her law office located at 401 E. Las Olas Blvd, Suite 1400 Fort Lauderdale, Florida 33301.

Ms. Bacchus advised that she is actively representing Attorney, Mr. Russell Williams, in a civil lawsuit involving defamation, libel and slander. This pending civil litigation was brought against Attorney, Ms. Ashley Krapacs. Broward County Case, # CACE 18017850.

Ms. Bacchus advised that Ms. Ashley Krapacs had been placing disparaging and defamatory posts on multiple social media outlets about both her and her law firm, regarding the pending litigation. Attorney Ashley Krapacs has been making the posts since approximately July 2018. These social media outlets include Facebook, LinkedIn, Instagram, YouTube, as well as the professional web site run by Ms. Krapacs, ASHLEYANN KRAPACS, PLLC. These posts were derogatory in nature and were directed at Attorney, Mr. Russel Williams and Attorney, Ms. Nisha Bacchus.

Ms. Bacchus provided Detective Freeley with printed copies of the multiple social media, online posts. In addition to the posts, Attorney Ashley Krapacs had placed multiple video blogs on YouTube.

Ms. Bacchus advised she has not received or observed any physical threats against her or the Bacchus Law Firm, on any social media posts by Ms. Krapacs. Ms. Bacchus advised she felt anxious and nervous due to the continued and multiple Derogatory social media posts made by Attorney Krapacs.

On 01/11/2019, Ms. Bacchus filed for a temporary Injunction against Attorney Ashley Krapacs. Broward County Case number DVCE19000341, which was granted by the honorable Judge Moon.

After conferring with the Broward County State Attorney's Office it was determined that the social media posts, made by Attorney Ashley Krapacs do not rise to the criminal level and are currently a civil and State of Florida Bar issue.

Detective Freeley advised Ms. Bacchus to continue to monitor the social media posts and notify the Fort Lauderdale police Department, if there are any specific threats towards her or the Bacchus Law Firm.

# CASE SUPPLEMENTAL REPORT

Printed: 01/29/2019 09:13

Ft Lauderdale Police Department

OCA: 341901005968

THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY

Case Status: *INACTIVE*

Case Mng Status: *NA*

Occurred: *01/11/2019*

Offense: *INFORMATION*

Investigator: *FREELEY, MICHAEL E (1386)*

Date / Time: *01/28/2019 11:52:08, Monday*

Supervisor: *JOSEPH, DEREK (1282)*

Supervisor Review Date / Time: *01/29/2019 07:13:04, Tuesday*

Contact:

Reference: *Miscellaneous*

Under penalties of perjury, I declare that I have read the foregoing and that the facts stated therein are true and correct to the best of my knowledge and belief.

Electronically Signed: Det. Michael Freeley Date: 01/28/2019

*MJ, E 1386*

Investigator Signature

*D. Joseph*

Supervisor Signature

The Florida Bar's  
Exhibit D



# INCIDENT/INVESTIGATION REPORT

Ft Lauderdale Police Department

Case # 34-1901-005968

Status Codes   L = Lost   S = Stolen   R = Recovered   D = Damaged   Z = Seized   B = Burned   C = Counterfeit / Forged   F = Found							
D R U G S	UCR	Status	Quantity	Type Measure	Suspected Type	Up to 3 types of activity	
Assisting Officers							

Suspect Hate / Bias Motivated: *None*

NARRATIVE
-----------

**REPORTING OFFICER NARRATIVE***Ft Lauderdale Police Department*

OCA

34-1901-005968

Victim

Offense

*INFORMATION*

Date / Time Reported

*Fri 01/11/2019 00:00*

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The Florida Bar's  
Exhibit E

IN THE CIRCUIT COURT OF THE 17<sup>TH</sup> JUDICIAL CIRCUIT  
IN AND FOR BROWARD COUNTY FLORIDA

RUSSELL J. WILLIAMS and  
RUSSELL J. WILLIAMS P.A.,

CASE NO: CACE18017850  
DIVISION: 03

Plaintiffs,

vs.

ASHLEY ANN KRAPACS, and  
ASHLEY KRAPACS, PLLC,

Defendants.

AMENDED COMPLAINT FOR DAMAGES AND PETITION  
FOR INJUNCTIVE RELIEF

Plaintiffs, RUSSELL J. WILLIAMS ("WILLIAMS") and LAW OFFICES OF RUSSELL J. WILLIAMS, P.A., ("WILLIAMS P.A."), (Collectively referred to as "Plaintiff") by and through their undersigned counsel, and files this Complaint for Damages against Defendants, ASHLEY ANN KRAPACS ("KRAPACS") and ASHLEY KRAPACS PLLC ("KRAPACS PLLC"), (Collectively referred to as "Defendant") and states the following in support:

1. This is a civil action seeking monetary damages in excess of \$15,000.00 dollars, exclusive of costs, interest, and attorney's fees against all Defendants.

PARTIES

2. At all times material hereto, Williams is an attorney in Fort Lauderdale, Florida and is a resident of Broward County, Florida, has been practicing for over thirty (30) years, and is otherwise *sui juris*.

3. At all times material hereto, Williams P.A. is a Florida Corporation with its principle place of business located in Broward County, Florida, and is otherwise *sui juris*.

4. At all times material hereto, Defendant KRAPACS, is an attorney in Fort Lauderdale, Florida, and is believed to be a resident of Broward County, Florida and is otherwise *sui juris*.

4. At all times material hereto, Defendant KRAPACS, is an attorney in Fort Lauderdale, Florida, and is believed to be a resident of Broward County, Florida and is otherwise *sui juris*.

5. At all times material hereto, Defendant KRAPACS PLLC, is a law office in Fort Lauderdale, Florida, and is otherwise *sui juris*.

6. At all times material hereto, the tortious acts committed by the Defendants, and complained of herein, all occurred in Broward County, Florida.

#### **FACTS COMMON TO ALL COUNTS**

7. On or about March 21, 2018, KRAPACS, filed a Pro Se domestic violence injunction against Mr. Gregory Knoop, respondent. (Court can take Judicial Notice of Case No. DVCE 18-737).

8. The court issued a temporary injunction and set a hearing date.

9. Mr. Knoop discovered that a temporary injunction was entered against him, despite residing in Texas and not being personally served with same.

10. As a result, Mr. Knoop contacted his legal counsel in Texas and was referred to Williams P.A.

11. Williams P.A. subsequently undertook representation of Knoop in a limited capacity for purposes of contesting jurisdiction.

12. On behalf of Mr. Knoop, Plaintiff filed a Motion to Dismiss the Injunction based upon a lack of personal jurisdiction.

13. Williams P.A. asserted that in order for there to be personal jurisdiction over Knoop, Mr. Knoop as well as an act of domestic violence, pursuant to F.S. § 741.28, had to have taken place in the State of Florida.

14. On April 12, 2018, a hearing was held on Respondent's Motion to Dismiss.

15. After hearing argument from the parties, the court granted the Respondent's motion to dismiss, and stated it lacked personal jurisdiction over the defendant pursuant to F.S. § 741.30(6)(d)(3) and F.S. § 48.193. (Order in DVCE 18-737).

16. Not to be deterred, on April 13, 2018, KRAPACS filed yet a second Pro Se petition for domestic violence injunction. However, this time the Court did NOT grant the temporary injunction. (Court can take Judicial Notice of Case No. DVCE 18-2712)..

17. On or about April 14, 2018, KRAPACS posted on social media about her injunction getting dismissed and how WILLIAMS lied at the hearing. KRAPACS' post that the Plaintiff lied is not true.

18. On or about April 23, 2018, KRAPACS again posted on social media (Facebook), that WILLIAMS had treated her badly. This of course could never be true because Plaintiff has never had any direct or indirect contact with KRAPACS.

19. On or about April 23, 2018, KRAPACS and KRAPACS PLLC wrote an article which she posted on a national blog, entitled Ms. Esquire, that has approximately 7,000 followers. Many of these followers are believed to be female lawyers in Broward County, Florida. The article is titled, "When you don't let female lawyers talk, we'll only get louder." (See attached Exhibit A)

20. This blog was utilized by KRAPACS and KRAPACS PLLC and is primarily for female lawyers.

21. Plaintiff only found out about the article when mutual female friends began re-posting the article. In this article, KRAPACS and KRAPACS PLLC not only disparages and defames WILLIAMS, but she belittles the Circuit Court Judge as well.

22. KRAPACS and KRAPACS PLLC comments were that both WILLIAMS and the Judge "were old white males", a term used by the feminist movement to suggest that older white gentlemen are out of touch with reality. (See Attached Exhibit B).

23. On or about May 6, 2018, KRAPACS again posted on Social media (Facebook) additional comments about the case which disparage and defame Plaintiff. KRAPACS posted the following: "Mr. Williams faced no consequences for lying on the record". (See Attached Exhibit C).

24. On or about April 23, 2018, KRAPACS filed a frivolous Florida Bar Complaint against Williams which was ultimately dismissed on July 5, 2018.

25. During the pendency of the bar complaint, KRAPACS and KRAPACS PLLC again posted on social media the fact that WILLIAMS is a "moron". (See attached Exhibit D).

26. Additionally, on or about May 10, 2018, KRAPACS and KRAPACS PLLC posted another article on Ms. Esquire, this article was titled: "Bad Attorney Behavior: If you See it, Report it". (See attached Exhibit E).

27. The undersigned received calls regarding this article. In this article, KRAPACS and KRAPACS PLLC defame and disparages Williams, more specifically calling Plaintiff a "sexist and a bully" as well as a "liar".

28. In this second article, KRAPACS and KRAPACS PLLC specifically quotes from Williams response that he had filed with the Florida Bar. As such, KRAPACS is no longer immune from civil liability for filing this frivolous bar complaint. *Tobkin v. Jarboe*, 710 So.2d 975 (Fla. 1998).

29. Additionally, between May 23, 2018, up to including the present and continuing, KRAPACS and KRAPACS PLLC have posted a series video blogs on YouTube. In these video blogs KRAPACS and KRAPACS PLLC continues to disparage and defame WILLIAMS as well as impugn the integrity of the Circuit Court Judge.

30. At all times material hereto, the aforementioned conduct of KRAPACS AND KRAPACS PLLC was malicious, spiteful, hateful and done with the reckless disregard towards the good name and the personal and professional reputation of WILLIAMS and WILLIAMS PA.

**COUNT I**  
**SLANDER PER SE AGAINST DEFENDANT KRAPACS**

31. Plaintiffs re-adopts and realleges paragraphs 1 through 30 as if fully set forth herein.

32. At all times material hereto, KRAPACS has been using social media, including but not limited to Facebook and her own personal blog, to conduct a smear campaign against Williams.

33. KRAPACS has published and continues to publish false and unprivileged information which has a tendency to injure the personal and business reputation of WILLIAMS and WILLIAMS P.A.

34. As a direct and proximate result of false publications, KRAPACS has caused injury and damage to WILLIAMS' reputation and good name and to WILLIAMS P.A.'s business relations, business reputation, and WILLIAMS P.A.'S good name.

35. As such, the actual publication of false and untruth information is actionable per se.

**WHEREFORE**, the Plaintiffs WILLIAMS and WILLIAMS P.A. seek compensatory and consequential damages against KRAPACS as well as any other relief deemed just and necessary.

**COUNT II**  
**LIBEL PER SE AGAINST DEFENDANT KRAPACS**

36. Plaintiffs re-adopts and realleges paragraphs 1 through 30 as if fully set forth herein.

37. KRAPACS has made false statements, in writing, concerning the Plaintiffs.

38. KRAPACS has made these written false statements concerning the Plaintiffs

knowing that these statements are false.

39. The specific intent of KRAPACS, in making said false, public, written statements concerning the Plaintiff's is to destroy the good name and reputation of WILLIAMS and future business opportunities of WILLIAMS P.A.

40. A publication is libelous per se or actionable per se, and not protected by the First Amendment if, when considered alone without innuendo: it charges that a person has committed an infamous crime or it tends to subject one to hatred, distrust, ridicule, contempt, or disgrace; or it tends to injure one in his trade or profession.

41. As a direct and proximate result of false publications, KRAPACS has caused injury and reputation damage to WILLIAMS and further, damage to the WILLIAMS P.A.'S business relations, business reputation, and WILLIAMS P.A.'s good name.

**WHEREFORE**, the Plaintiffs WILLIAMS and WILLIAMS P.A. seeks compensatory and consequential damages against KRAPACS as well as any other relief deemed just and necessary.

**COUNT III**  
**MALICIOUS PROSECUTION AGAINST DEFENDANT KRAPACS**

42. WILLIAMS re-adopts and realleges paragraphs 1 through 30 as if fully set forth herein.

43. On or about April 23, 2018, KRAPACS did cause the commencement and continuation of an original administrative proceeding, a frivolous bar complaint, against WILLIAMS by falsely accusing him of unethical behavior.

44. At the time she commenced the frivolous bar complaint, KRAPACS knew that there existed no probable cause or legal probable cause to justify her actions.

45. That case was terminated by the Florida Bar by dismissing the complaint in favor of WILLIAMS constituting a bona termination in favor of WILLIAMS.

46. The actions of KRAPACS were without any legal justification such that they constituted legal and/or actual malice. KRAPACS' conduct was unethical, hateful and spiteful and was conducted in bad faith with malicious purpose and exhibited wanton and willful disregard for the good name of Plaintiff WILLIAMS.

47. As a direct and proximate result of the malicious prosecution of WILLIAMS by KRAPACS, he suffered severe and permanent damage to his good name, humiliation, loss of reputation, and indignation.

**WHEREFORE**, Plaintiffs WILLIAMS seeks entry of final judgment against KRAPACS for compensatory and consequential damages, as well as, attorney fees pursuant to *Glusman v. Lieberman* 285 So. 2d 29 (Fla. 4<sup>th</sup> DCA 1973), costs, and such other relief that the Court deems just and proper.

**COUNT IV**  
**SLANDER PER SE AGAINST DEFENDANT KRAPACS PLLC**

48. Plaintiffs re-adopts and realleges paragraphs 1 through 30 as if fully set forth herein.

49. At all times material hereto, KRAPACS PLLC been using social media, including but not limited to Facebook and her own personal blog, to conduct a smear campaign against Williams.

50. KRAPACS PLLC has published and continues to publish false and unprivileged information which has a tendency to injure the personal and business reputation of WILLIAMS and WILLIAMS P.A.

51. As a direct and proximate result of false publications, KRAPACS PLLC has caused injury and damage to WILLIAMS' reputation and good name and to WILLIAMS P.A.'s business relations, business reputation, and WILLIAMS P.A.'S good name.

WHEREFORE, Plaintiffs WILLIAMS and WILLIAMS P.A. seek entry of final judgment against KRAPACS PLLC for compensatory, consequential, costs, and such other relief that the Court deems just and proper.

**COUNT Y**  
**TEMPORARY INJUNCTION AGAINST DEFENDANTS**

52. The Plaintiffs re-adopt and realleges paragraphs 1 through 30 as if fully set forth herein.

53. A movant seeking a preliminary injunction is entitled to the injunction where it shows: (1) it has a substantial likelihood of success on the merits; (2) it will suffer irreparable harm unless the status quo is maintained; (3) it has no adequate remedy at law; and (4) a temporary injunction will serve the public interest. *See JonJuan, Inc. v. Acosta*, 922 So. 2d 1081, 1083 (Fla. 4th DCA 2006). As demonstrated herein and based upon the facts alleged in the Complaint, and the testimony that shall be presented to the Court at a hearing on this Motion, Plaintiffs have satisfied these elements and is thus entitled to a temporary injunction against Defendants

54. As set forth in detail herein, and until the status quo is maintained, each week that the Defendant is permitted to publish untruthful and defamatory lies about Plaintiffs, they will continue suffering irreparable harm.

55. Plaintiffs have no adequate remedy at law, thus a mandatory temporary injunction needs to be issued requiring specific performance of the contract.

56. Here, money damages are inadequate as they are not susceptible to reasonable proof and will not compensate Plaintiffs for all aspects of Defendant's actions. Even if the money damages are calculable, they do not address the destruction to Plaintiffs business.

57. Plaintiffs submits that pursuant to Florida Law, Plaintiffs have a substantial likelihood of success on the merits.

WHEREFORE, Plaintiff demands entry of a temporary injunction pursuant to Fla. R. Civ. P. 1.610 enjoining Defendant from continuing her publication of written and oral defamatory statements regarding the Plaintiffs, including but not limited to:

1. Enjoining Defendant from continuing to defame Plaintiff's on any social media platform;
2. Awarding Plaintiff its costs and reasonable attorney's fees pursuant to Florida Law;
3. And granting Plaintiffs such other and further relief as this Court deems just equitable and proper.

**COUNT VI**  
**PERMANENT INJUNCTION AGAINST DEFENDANTS**

58. The Plaintiffs re-adopt and realleges paragraphs 1 through 30 as if fully set forth herein.

59. To obtain a permanent injunction, a Plaintiff must establish a clear legal right, an inadequate remedy at law and that irreparable harm will arise absent injunctive relief. *See K.W. Brown v. McCutchen*, 819 So. 2d 977, 979 (Fla. 4<sup>th</sup> DCA 2002)

60. Plaintiffs have the clear legal right to enjoin Defendant's conduct that is defamatory per se and is intended by Defendants to destroy Plaintiffs' reputation, good name, and business.

61. As set forth in detail herein, and until the status quo is maintained, each week Defendants are permitted to publish untruthful and defamatory lies about Plaintiffs, they will continue suffering irreparable harm.

62. Plaintiffs have no adequate remedy at law, thus a mandatory temporary injunction needs to be issued requiring specific performance of the contract. Here, money damages are inadequate as they are not susceptible to reasonable proof and will not compensate Plaintiffs for all aspects of Defendant's actions. Even if the money damages are calculable, they do not address the destruction to Plaintiffs business.

**WHEREFORE**, Plaintiffs demands entry of a temporary injunction pursuant to Fla. R. Civ. P. 1.610 enjoining Defendant from continuing her publication of written and oral defamatory statements regarding the Plaintiffs, including but not limited to:

1. Enjoining Defendant from continuing to defame Plaintiff's on any social media platform;
2. Awarding Plaintiff its costs and reasonable attorney's fees pursuant to Florida Law;
3. And granting Plaintiffs such other and further relief as this Court deems just equitable and proper.

**DEMAND FOR JURY TRIAL**

The Plaintiffs WILLIAMS and WILLIAMS P.A. demand a trial by jury on all issues.

Respectfully submitted,

**THE BACCHUS LAW FIRM**

By: /s/Nisha E. Bacchus  
**Nisha Bacchus Esq.**  
Florida Bar No. 89768  
401 East Las Olas Blvd, Suite 1400  
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## Ashley Ann Krapacs, PLLC

### Be Empowered Blog

# When You Don't Let Female Lawyers Talk, We'll Only Get Louder

April 23, 2018 | Ashley Krapacs



This past August, Shira A. Scheindlin, a retired Federal District Court judge, wrote an Op Ed in the New York Times entitled, "Female Lawyers Can Talk, Too." Ms. Scheindlin describes what she witnessed during her more than two decades on the bench in New York.

"The talking was almost always done by white men. Women often sat at counsel table, but were usually junior and silent. It was a rare day when a woman had a lead role — even though women have made up about half of law school graduates since the early 1990s."

Ms. Scheindlin's article contains a call to action to level the playing field for women in the courtroom. She suggests that clients demand diversity in the legal teams that represent them. She says that law firms should do more to diversify their litigation teams, including guaranteeing that junior female lawyers participate in depositions to the same extent as their male counterparts. She encourages judges to insist that lawyers argue their own briefs, since female attorneys are often the authors of briefs that are then argued by male attorneys.

There's no question that female lawyers can talk, too. However, Ms. Scheindlin seems to suggest that the problem lies with women not getting the opportunity to participate in court proceedings. I agree and

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would add to that: even when women are given the opportunity to participate in court, too often, they aren't permitted to. Too often, they're silenced and stifled and shushed. Too often, they're talked over and talked down to and ganged up on to by all the other white men in the courtroom).

That's exactly what happened to me in a recent hearing.

Opposing counsel was an old white male. The judge was an old white male. I left the hearing feeling like I'd been completely sandbagged. I felt completely deflated. Like I really had to work on my courtroom skills. Like my performance had caused me to lose the hearing.

Something about the hearing really rubbed me the wrong way, though, and I couldn't let it go, so I got a recording of the hearing and listened to it. And I realized I had conducted myself the best that I possibly could have. I realized that I should be proud for how I stood my ground and didn't waiver. And I realized that I was going to lose that hearing regardless of how strong my argument was.

The bias in that hearing was so subtle, I didn't fully detect it in the moment. But after listening to the recording, it was clear as day. One exchange during the hearing was so egregious, I had to listen to it over and over because I simply could not believe what had transpired. Here's a brief summary of the events that led up to the hearing, to give you some context.

I had filed a motion to amend my original petition to include information that would have cured the grounds for opposing counsel's motion to dismiss, which is what this particular hearing was scheduled for. My motion was filed *before* opposing counsel's motion, but it never got ruled on, and it wasn't scheduled for a hearing like opposing counsel's was. The court still has not provided me with a valid explanation for why my motion never got ruled on, or why opposing counsel got a hearing on his motion and I didn't.

Regardless, the judge decided not to let me discuss the additional information during the hearing, decided not to continue the hearing until I had time to amend, decided not to rule on my motion for leave to amend, and he granted opposing counsel's motion to dismiss. During the hearing, anticipating I'd refile my case (I did), the judge inquires whether opposing counsel was aware of my prior motion.

Judge to opposing counsel: "Mr. X, did you receive a copy of the motion for leave to amend?"

Opposing Counsel: "No, because, judge, I filed a motion for personal jurisdiction, to dismiss for personal jurisdiction, I have not filed a notice of appearance as attorney of record."

Me: "I'm sorry, did opposing counsel say he never received that?"

Opposing Counsel: "I know it's been filed, I went to the clerk's office, to obtain a copy, they would not give it to me because they would not, um. Because I'm not attorney of record."

Me: "I'd like to confirm for the record I emailed it to..."

Judge interrupts me mid-sentence: "One moment. Don't interrupt, please."

It's clear from the recording that when I start my sentence, "I'd like to confirm," no one else was speaking as I began talking. Yet the judge

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interrupts me, scolds me for interrupting (which I didn't do), then proceeds to allow opposing counsel to continue speaking, at which point opposing counsel *repeats his lie twice more* before coming clean. The judge is bailing him out, and he just keeps digging himself deeper and deeper!

Opposing Counsel: "I didn't get. I never got. Uh, I the motion to amend. Yes, she, Petitioner is right. I did get the motion to amend. You're right. She did email it to me."

So maybe that's why firms are sending their male attorneys to step up to the plate instead of females. The reality is, in too many courtrooms, the males are getting preferential treatment. And I suspect this sort of stuff is happening in courtrooms across the country more often than we realize or would like to admit.

It wasn't until later in the hearing, after the subject had been changed already, that the judge permitted me to finish my statement that I had emailed the motion to amend to opposing counsel, to the email address he has registered with the Florida Bar, and that I included him on the court's e-service list. I was proud of myself that despite the fact that the judge wasn't thrilled I caught opposing counsel in a lie and wanted to emphasize it for the record, I stood my ground and refused to be silenced and bullied.

The problem runs so much deeper than Ms. Scheindlin seems to suggest. The Old Boys' Club is alive and well in 2018. I don't think the judge who tried to silence me is a bad man. He likely would say and probably believes that he is not biased or sexist. However, his treatment of me proves otherwise. We wouldn't have even been in that hearing if he had acknowledged and acted on my motion for leave to amend the petition. When this sort of unconscious bias is permitted to permeate our judiciary, there's no amount of diversification at law firms that is going to correct the harm that is being done to female litigators and to our professional as a whole.

It's not just about getting women the opportunity to advocate for their clients in the courtroom, it's also about ensuring that they receive the same treatment in court as their male counterparts do.

So what can be done? Unfortunately, it's on us female attorneys to ferret out this treatment and hold the judiciary accountable. We have to keep an eye out for this type of treatment. What I experienced was so subtle. The judge spoke so softly and even-keeled, he seemed kind and fair in the moment. When he gently told me not to interrupt, my immediate reaction was to stop talking, and I felt embarrassed that I had interrupted someone. It never crossed my mind that I hadn't actually done what he was saying I did.

There's a term for this. It's called gaslighting. Causing someone to doubt themselves so they believe they've done something they actually haven't. And I wouldn't have known that that's what was going on if I hadn't listened to the recording. But when you're litigating and trying to advocate, it's hard to see that in the moment.

My suggestion is that if you leave a hearing and you have a nasty feeling about it, get a copy of the transcript or the recording. Heck, in my case, even a transcript would not have revealed that I hadn't actually interrupted anyone. The transcript would have actually made it seem like I had! So get a recording, listen to it. Take notes about what you think might have been off during the hearing. Ask a colleague to listen to it and give you their opinion. And if something seems improper, do something about it. File a motion to reconsider. File a

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motion to recuse. File a complaint. Cumbersome, I know. And expensive—getting a recording and transcripts for a 30 minute hearing cost me over \$200. But it's necessary.

Sadly, we have become so accustomed to this treatment, we don't even realize it's happening. It's so subtle yet so effective. Becoming aware of it, taking steps to stop it, and holding abusers accountable, even though that can be risky, is the only way it's ever going to end.

Female lawyers can talk, too. And if you don't let us, we're only going to get louder.

*Ashley Ann Krapacs is an attorney licensed in New York, Florida, and DC. She practices employment law in south Florida. She also runs an online bar exam coaching business, Stress Less Achieve Success Bar Exam Coaching. This article is not intended be legal advice.*

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Update on my domestic violence case

The law firm of Williams Hill Wigand Grande has been retained by my abuser to represent him in the domestic violence case, which I filed in Florida to get an injunction of protection against my abuser.

So, Russell J. Williams, ESQ sends me a letter threatening to FILE A MOTION FOR SANCTIONS AGAINST ME if I don't dismiss the domestic violence case within 21 days.

Old White Male Attorney #2 steps up to the plate to harass a domestic violence victim with yet another baseless legal threat. Classic.

I emailed Mr. Russell J. Williams, ESQ. to remind him that the Florida Rules of Ethics make it unethical to threaten another member of the bar with a grievance complaint. I also reminded him that the Rules require that lawyers use the law's procedures only for legitimate purposes and not to harass or intimidate others.

Crickets.

Baseless or not, it's still jarring to receive threats like this, and it's like reliving the trauma over and over again. This sort of manipulation of the law to harass and silence vulnerable victims should not be permitted. And trust me, I plan to make it my life's work to make sure it stops. #metoo #timesup #noharass

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Update on my domestic violence case: judge granted opposing counsel's motion to dismiss based on lack of personal jurisdiction. But here's the kicker: I had filed my own motion weeks prior requesting to amend my original petition to include information that would have cured any issue with personal jurisdiction.

That motion never got ruled on. Got straight up ignored.

I inquired regarding why my motion wasn't ruled on and why I never got a hearing on my motion like my abuser's attorney got for his motion (even though he isn't even counsel of record since he didn't enter his appearance in the case). Judge said, "Well, you didn't call my office."

I was told on 3 SEPARATE OCCASIONS by Broward County Courthouse employees I was not permitted to have a hearing, yet my abuser's attorney got one. Knowing this, the judge didn't have to rule on the motion to dismiss. He could have given me time to amend. But he didn't. He granted the motion to dismiss.

Oh, and opposing counsel blatantly, flat-out LIED on the record. The judge didn't bat an eye.

So I had to start all over again. I filed a new petition yesterday. I'm documenting the date, time, and name of every courthouse employee I speak with. Something is really off here. #metoo #timesup #domesticviolence #womensrights #keepfighting

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Miriam Jordl  
Retired Red Seal, Journeymen, Sheet Metal Worker. On to the next chapt...  
Keep up the IMPORTANT work!  
Like Reply 4 Likes · 1 Reply

Ashley Krapacs, Esq.,  
Owner at Ashley Ann Krapacs, PLLC  
I'm not giving up. It's hard, but I'm going to fight to the end!  
Like Reply 3 Likes

Mechelle S. W.,  
President of Operations at CS Stone Brands®  
Ashley, this is my opinion. I've dealt with a similar situation concerning two judges. The case I worked on, evidence was allowed, submitted & tagged. Evidence is no where to be found at this time. The case I worked on was a DV case. Original Judge refused to let the party plead, argue & submit evidence. Case went before Chief District Court Judge there was substantial evidence for the case to be Vacated/Set Aside. Evidence was either thrown in the garbage, possibly removed by the original judge or the Plaintiff after the second Judge heard the case. Clerks allow people & attorneys to go into the file room in this particular county. The case is pending Appeal. It could impact the Appeal decision on this case do to evidence disappearing.

I wouldn't put too much trust into Court Clerks. There is an issue with the Judge there & the attorney. This is a classic case of public corruption in the courts.

Like Reply 3 Likes · 1 Reply

Ashley Krapacs, Esq.,  
Owner at Ashley Ann Krapacs, PLLC  
I'm just in awe. I was a clerk at DC Superior for a year and a half, and this type of crap would never happen there! I guess DC is just far more progressive. I'm not giving up. Trust me, I'll be calling the Judge's chambers every day until I get my hearing. I'm constitutionally

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This was just a slap in the face. Given my experience with how much integrity the DC court system has, I'm astounded by what ...see more

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Patricia L. Shenk  
Owner/Manager of PLS Document & Office Management Enterprises, LLC  
Omg, clear abuse of power. Evidence tampering is illegal. You may want to get a high profile lawyer to help, as corruption is severe there. They think they do not have to obey the laws they are hired to uphold. I'm so sorry.

Like Reply 1 Like

57m

Cavin Shakesheave  
Independent Transportation/Trucking/Railroad Professional  
Stick with it Ashley you will get there check you have the facts in order dates times letters emails phone records etc best wishes

Like Reply 1 Like

10m

Ashley Krapacs, Esq.  
Owner at Ashley Ann Krapacs, PLLC  
4d

It's been awhile, so I wanted to update everyone on my domestic violence case.

My ex's attorney here in FL, Mr. Russell J. Williams, Esquire, sent me a let ...see more

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Ashley Krapacs, Esq.  
Owner at Ashley Ann Krapacs, PLLC  
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I've been inspired—and pissed off—by my bully ex-boyfriend and his bully attorneys and their aggressive and intimidating legal tactics after I confronted my ex about his past abuse of me. ...see more

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Lawyer  
krapacslaw.com  
Ashley Ann Krapacs is a Florida sexual harassment lawyer, advocat...

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Ashley Krapacs, Esq.  
Owner at Ashley Ann Krapacs, PLLC  
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If you took the February bar exam, you've likely been enjoying your newfound freedom. However, wondering if you passed is probably never very far from your mind. What's worse, you still have a few more weeks—if not months, day ...see more

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Ashley Krapacs

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...

DV case update: there is so much lying and dishonesty going on in this case that one of my abuser's attorneys, Russell J. Williams, let it slip that they are stalking me on social media through a fake Facebook account. The moron attached a screenshot to a legal proceeding which clearly shows the name of the fake person whose account they used to view my private Facebook profile information.

I couldn't make this shit up.

I've got nothing to hide, which is why I decided to go public about my case, but I keep my Facebook private (and I stopped checking in at places altogether several months ago) for my own personal safety since my ex is a dangerous and mentally unstable man. Apparently, they will stop at nothing to have access to me, though. Yet the courts have continued to bar me from advancing my cases. This crap has to stop. **#metoo #timesup #endsexualviolence #endsexism #protectwomen #oldboysclub #nomore**



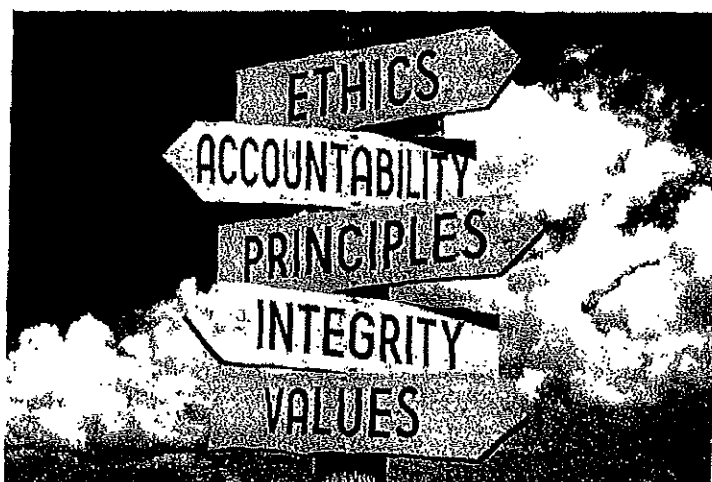


## Ashley Ann Krapacs, PLLC

### Be Empowered Blog

#### *Bad Attorney Behavior: If You See It, Report It*

May 10, 2018 | Ashley Krapacs



As an attorney licensed in three different jurisdictions (New York, Florida, and DC), I had to endure five separate ethics courses to get to where I am today: a course in law school; the Multistate Professional Responsibility Examination, which was required for all three jurisdictions; the New York bar exam in 2015, which tested on the New York-specific ethics rules; the Florida bar exam in 2016, which tested on the Florida-specific ethics rules; and a day-long ethics course with the DC bar.

Given the amount of ethics shoved down my throat, the message sent to me was clear: the rules of professional conduct in this field are to be taken very seriously. So when people have cracked jokes about attorneys being liars and scumbags, I was always perplexed, thinking, "Man, the ethics rules are so stern, that's gotta just be an outdated stereotype." I had not considered how new the emphasis on ethics in the legal field was. I had not considered the many generations of attorneys who came before me who weren't trained on ethics to the extent that I was and hadn't yet gotten the memo.

I'm heartbroken to learn how dirty and corrupt my field still is. Fortunately, the state bars are taking a hard stance against much of the bad attorney behavior that goes on. Unfortunately, it seems that violators of the rules largely are still not being held accountable. One reason, I suspect, is that too many people are afraid to report. And I can't say I blame them. For example, an individual who wishes to file a complaint against a DC attorney sees this intimidating warning at the top of the screen when they go to access the complaint form:

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6/14/2018

Bad Attorney Behavior: If You See It, Report It | Ashley Ann Krapacs

[ Sexual Harassment Lawyer

May 2018 (1)

April 2018 (3)

"Filing a complaint against an attorney is a serious matter. Do so only as a last resort when all efforts to work out the problem with your attorney have failed."

So I can imagine that many individuals, lawyers and clients alike, who make it that far are then discouraged to follow through with completing the complaint. I know I almost was. But if the state bars really want to clean up the profession, they need to be more welcoming to those who wish to provide feedback about attorneys in their jurisdictions, because trust me when I say that we still have a long way to go. Unlucky for the bad guys, though, I'm actually not afraid to report, despite how unpleasant the process can be.

Case in point: I recently filed an ethics complaint against Russell J. Williams of Williams, Hital, Wigand & Grande Law Firm based in South Florida. The complaint was based on the following information: Mr. Williams had sent me a letter threatening to file a motion for sanctions against me if I did not dismiss my case with prejudice within 21 days, although he provided no legal basis for sanctions in the letter. (Side note for those of you who are new to my story: this is my own personal domestic violence case in which I am representing myself trying to secure an injunction of protection against domestic violence against an ex-boyfriend, his client). I emailed Mr. Williams asking him to provide a basis. He never responded. (In fact, he hasn't responded to a single one of my emails.) I didn't withdraw my petition. Mr. Williams never filed a motion for sanctions, demonstrating that the threat in his letter was completely baseless and was intended only to intimidate, harass, and silence me.

Mr. Williams then proceeded to lie on the record numerous times during the one hearing that was held in the case on April 12, 2018. Additionally, he refuses to acknowledge on the record that he actually represents the respondent in this case, since the respondent has successfully avoided service repeatedly, even though Mr. Williams *has* stated that he represents his client in his threatening letters to me. At the same time, he expects to receive the full benefits from the court of an attorney who actually has filed a notice of appearance.

In Mr. Williams's response to the Florida Bar regarding my ethics complaint against him, he refuses to admit any wrongdoing and actually attempts to justify his behavior, many times using condescending, sexist statements to justify his actions. My favorite excerpts include:

"At the hearing, I never stated I did not receive a copy of the original petition. I stated I did not receive a copy of the motion to amend, but then corrected received it or not is irrelevant since the motion to strike, which Ms. Krapacs filed, did not address the personal jurisdiction argument. In fact, it was just the ramblings of a scorned woman."

"...And now, the rest of the story...Hell has no fury like a woman scorned."

"There are no bar rules which state that I have to teach my opponent how to practice law."

My jaw literally dropped numerous times reading Mr. Williams's response. The sexism and condescension he harbors is so engrained, he actually believes that these disparaging statements will successfully defend him against an ethics complaint with the Florida Bar. Hilariously, he also whines that I have been writing about him, "As if all this was not enough Ms. Krapacs, Esq. went on social media to disparage not only respondent, but the undersigned, as well as the court."

Boo hoo. He knows that truth is an absolute defense to defamation and that he can't do a damn thing about me calling him out for lying. But then he attaches

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5/14/2018

Bad Attorney Behavior: If You See It, Report It | Ashley Ann Krapacs

Sexual Harassment Lawyer

a screenshot of my private Facebook account, which shows him viewing my profile while very clearly logged in to Facebook as woman named, "Michelle." So he admitted to the Florida Bar that he is Facebook stalking the private Facebook profile of a domestic violence victim. He put a domestic violence victim's safety in jeopardy and accessed her private Facebook account through fraudulent means, and then had the gall to advertise that he had done so to the Florida Bar, as if such conduct is par for the course.

If it is, no one is safe. This man has been practicing for over 30 years. I cannot fathom how many female domestic violence victims and opposing counsel have been sandbagged and railroaded by this bully. My heart breaks. But I remain hopeful the Florida Bar will conduct a full investigation and take proper action.

This type of sexism and bullying has absolutely no place in the practice of law, and I will make it my mission to eradicate it to the fullest extent that I can. Female attorneys and parties deserve the same amount of respect and civility in this profession as anyone else does. And if attorneys who are stuck in the past do not wish to adhere to the codes of conduct in their respective jurisdictions, they should retire or find a new field.

The more we let stuff like this happen without holding violators accountable, the more it will continue to pervade our profession and prohibit females' access to justice. Despite the risks, despite how time-consuming the process is, despite how exhausting it is to get personally attacked by an attorney who is facing a complaint I've filed, I'm taking hard stance against this bullshit. It ends with me. Who's with me?

*Ashley Ann Krapacs is an attorney licensed in New York, Florida, and DC. She practices employment law in south Florida. She also runs an online bar exam coaching business, Stress Less, Achieve Success Bar Exam Coaching. This article is not intended be legal advice*

Tags: women's rights bullying

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754-200-9761	ashley@krapacslaw.com	401 E. Las Olas Blvd. Suite 1400 Fort Lauderdale, FL 33301	



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The Florida Bar's  
Exhibit F

## **Lazarus, Randi**

---

**From:** Casco, Maria  
**Sent:** Tuesday, January 22, 2019 8:23 AM  
**To:** Lazarus, Randi  
**Cc:** Sum, Alice  
**Subject:** FW: Bar Ethics Complaints Update

**From:** Ashley Krapacs <krapacsaa@gmail.com>  
**Sent:** Monday, January 21, 2019 6:52 PM  
**To:** Sum, Alice <asum@fowler-white.com>  
**Cc:** Casco, Maria <mcasco@floridabar.org>  
**Subject:** Bar Ethics Complaints Update

Good Evening Ms. Sum,

I just wanted to provide you with an update on my situation. Despite my best efforts to settle the defamation suit filed against me by Nisha Bacchus on behalf of Russell J. Williams, it is clear to me that amicable resolution is not possible. Every time I concede any ground and give my attorney the go-ahead to negotiate, Nisha's attacks against me escalate. At this point, I have serious concerns about her mental stability, and I really have no idea what she is capable of. As my attorney was attempting to negotiate a settlement, Nisha filed a domestic violence stalking injunction case against me (case #DVCE 19-000341). The petition is riddled with patently false information. Most concerning is that in every section where she is required (under oath) to disclose any related cases, she has indicated that there are none, even though the civil defamation case is still ongoing and forms the basis for everything I have posted.

For the time being, I have promised my attorney that I will not post anything on social media about my case. However, even though the proper channels (bar complaints, law enforcement, and the court system) have not been effective for me thus far, I will return to those in hopes that there will be some accountability. I will be filing a formal bar complaint against Nisha based on the inaccuracies in the injunction petition and the fact that it's clear she filed the case merely to gain leverage in the civil defamation case. Further, I'll be representing several of her former clients in various bar complaints and potential malpractice cases. Because the judge did issue a temporary injunction in the domestic violence case based on the false information and exaggerations that Nisha provided in the petition, I will be waiting until after my Wednesday morning hearing to file anything to err on the side of caution. But I wanted to alert you know to what is going on. Filing a frivolous domestic violence stalking case for the sake of gaining an advantage in a separate civil case is a gross misuse of the judicial system, and I intend to hold her accountable through the proper channels. Please let me know if you require any additional information. Have a wonderful evening.

Best,

Ashley

--  
--

Regards,

Ashley Ann Krapacs  
New York Bar #5389309

Florida Bar #122407  
District of Columbia Bar #1045497  
[ashley@krapacslaw.com](mailto:ashley@krapacslaw.com)  
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---

Please note: Florida has very broad public records laws. Many written communications to or from The Florida Bar regarding Bar business may be considered public records, which must be made available to anyone upon request. Your e-mail communications may therefore be subject to public disclosure.

The Florida Bar's  
Exhibit G



The Florida Bar's  
Exhibit H

4/14/2018

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## Ashley's Activity

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Ashley Krapacs, Esq.  
Owner at Ashley Ann Krapacs, PLLC  
3h

Update on my domestic violence case: Judge granted opposing counsel's motion to dismiss based on lack of personal jurisdiction. But here's the kicker: I had filed my own motion weeks prior requesting to amend my original petition to include information that would have cured any issue with personal jurisdiction.

That motion never got ruled on. Got straight up ignored.

I inquired regarding why my motion wasn't ruled on and why I never got a hearing on my motion like my abuser's attorney got for his motion (even though he isn't even counsel of record since he didn't enter his appearance in the case). Judge said, "Well, you didn't call my office."

I was told on 3 SEPARATE OCCASIONS by Broward County Courthouse employees I was not permitted to have a hearing, yet my abuser's attorney got one. Knowing this, the judge didn't have to rule on the motion to dismiss. He could have given me time to amend. But he didn't. He granted the motion to dismiss.

Oh, and opposing counsel blatantly, flat-out LIED on the record. The judge didn't bat an eye.

So I had to start all over again. I filed a new petition yesterday. I'm documenting the date, time, and name of every courthouse employee I speak with. Something is really off here. #metoo #timesup #domesticviolence #womensrights #keepfighting

9 Likes · 8 Comments

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Add a comment...

Miriam Jordt  
Retired Red Seal Journeyman, Sheet Metal Worker. On to the next chpt...  
Keep up the IMPORTANT work!

Like Reply · 4 Likes · 1 Reply

Ashley Krapacs, Esq.  
Owner at Ashley Ann Krapacs, PLLC  
I'm not giving up. It's hard, but I'm going to fight to the end!  
Like Reply · 3 Likes

Mechelle S. W.  
President of Operations at CS Stone Brands

Ashley, this is my opinion. I've dealt with a similar situation concerning two judges. The case I worked on, evidence was allowed, submitted & tagged. Evidence is no where to be found at this time. The case I worked on was a DV case. Original Judge refused to let the party plead, argue & submit evidence. Case went before Chief District Court Judge there was substantial evidence for the case to be Vacated/Set Aside. Evidence was either thrown in the garbage, possibly removed by the original Judge or the Plaintiff after the second Judge heard the case. Clerks allow people & attorneys to go into the file room in this particular county. The case is pending Appeal. It could impact the Appeal decision on this case do to evidence disappearing.

I wouldn't put too much trust into Court Clerks. There is an issue with the Judge there & the attorney. This is a classic case of public corruption in the courts.

Like Reply · 3 Likes · 1 Reply

Ashley Krapacs, Esq.  
Owner at Ashley Ann Krapacs, PLLC  
I'm just in awe. I was a clerk at DC Superior for a year and a half, and this type of crap would never happen there! I guess DC is just far more progressive. I'm not giving up. Just me, I'll be calling the Judge's chambers every day until I get my hearing. I'm constitutionally

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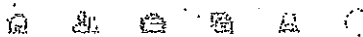
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4/14/2018

Ashley Krapacs, Esq. | LinkedIn



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This was just a slap in the face. Given my experience with how much integrity the DC court system has, I'm astounded by what ...see more

Like Reply 3 Likes

Patricia L. Shenk

Owner/Manager of PLS Document & Office Management Enterprises, LLC

Omg, clear abuse of power. Evidence tampering is illegal. You may want to get a high profile lawyer to help, as corruption is severe there. They think they do not have to obey the laws they are hired to uphold. I'm so sorry.

Like Reply 1 Like

Cavin Shakesheave

Independent Transportation/Trucking/Railroad Professional

Stick with it Ashley you will get there check you have the facts in order dates times letters emails phone records etc best wishes

Like Reply 1 Like

Ashley Krapacs, Esq.

Owner at Ashley Ann Krapacs, PLLC

4d

It's been awhile, so I wanted to update everyone on my domestic violence case.

My ex's attorney here in FL, Mr. Russell J. Williams, Esquire, sent me a let ...see more

59 Likes · 15 Comments

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Ashley Krapacs, Esq.

Owner at Ashley Ann Krapacs, PLLC

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I've been inspired—and pissed off—by my bully ex-boyfriend and his bully attorneys and their aggressive and intimidating legal tactics after I confronted my ex about his past abuse of me. ...see more

Ashley Ann Krapacs | Florida | Sexual Harassment  
Lawyer

krapacslaw.com

Ashley Ann Krapacs is a Florida sexual harassment lawyer, advocat...

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Owner at Ashley Ann Krapacs, PLLC

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Ashley Krapacs, Esq.

Owner at Ashley Ann Krapacs, PLLC

4w

If you took the February bar exam, you've likely been enjoying your newfound freedom. However, wondering if you passed is probably never very far from your mind. What's worse, you still have a few more weeks—if not months, de...see more

# The Florida Bar's Exhibit I

4/21/2018

Ashley Krapacs - Today, I got a recording of my hearing from last...

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Ashley Krapacs

14 yrs · Fort Lauderdale, FL ·

Today, I got a recording of my hearing from last week. I knew that how I had been treated, by opposing counsel and the judge, was bad, but DAMN. All I can say is, I've always wanted to write a book. And, well, this book is writing itself. #metoo #timesup #nomore #endsexism #holynisogyny #lawyerlife #keepfighting #justicewillprevail

Like

Comment

21



Vika Lynn I didn't forget you but I'm in Arizona...will touch base when I get back Monday.

Like · Reply · 14h



Ashley Krapacs Thanks, girl. We'll catch up next week. Safe travels!

Like · Reply · 14h



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1/1

The Florida Bar's  
Exhibit J

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT  
IN AND FOR BROWARD COUNTY, FLORIDA  
CASE NO.: DVCE-18-000737(59)

ASHLEY KRAPACS,

Petitioner,

v.

GREGORY KNOOP,

Respondent.

---

HEARING BEFORE JUDGE MICHAEL KAPLAN

THURSDAY, APRIL 12, 2018  
BROWARD COUNTY COURTHOUSE  
201 SE 6TH STREET, ROOM 10-150  
FORT LAUDERDALE, FLORIDA 33301  
2:08 - 2:39 p.m.

**The Florida Bar's Exhibit J**

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## 1 APPEARANCES

2 On behalf of the Petitioner:  
Ashley Krapacs, Pro Se  
3 510 S.E. 5th Avenue, #1409  
Fort Lauderdale, Florida 33301  
4 krapacsaa@gmail.com

5 On behalf of Respondent:  
Russell J. Williams, Esquire  
6 633 S.E. 3rd Avenue, Suite 201  
Fort Lauderdale, Florida 33301  
7 943-525-2889  
rjwesquire@aol.com

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1 (Thereupon, the following proceeding was had.)

2 THE COURT: Case number 18-737, Krapacs versus  
3 is it pronounced Knoop?

4 MR. WILLIAMS: Knoop.

5 THE COURT: All right. And, ma'am, what is  
6 your name?

7 MS. KRAPACS: Ashley Krapacs.

8 THE COURT: Ms. Krapacs, good afternoon. And,  
9 counsel, would you announce your appearance.

10 MR. WILLIAMS: Russell Williams.

11 THE COURT: So the matter set for hearing  
12 today is a motion filed by Mr. Williams on behalf  
13 of the respondent. And actually I see two motions,  
14 but the one I read was a motion to dismiss. I  
15 think that's the one set for hearing, right?

16 MR. WILLIAMS: It is. I think the petitioner  
17 had filed a motion to strike.

18 THE COURT: That's the other one I see here.  
19 There's a motion to strike respondent's motion to  
20 dismiss. And, ma'am, you think there's a legal  
21 basis that I support striking the motion so I  
22 wouldn't hear it or are you just arguing against  
23 the motion?

24 MS. KRAPACS: So there are statements in that  
25 motion that are I don't think appropriate for the

1 record for a number of reasons and I explain that  
2 in my motion to strike.

3 THE COURT: Let me take a moment. I don't  
4 recall having read it candidly, but I'm going to  
5 read it now.

6 MS. KRAPACS: Sure.

7 THE COURT: And if I did it will refresh my  
8 memory.

9 MS. KRAPACS: Sure.

10 THE COURT: Okay. As I read the motion, it  
11 appears to challenge some of the factual bases  
12 alleged in the motion to dismiss essentially  
13 challenging the truth of the statements. That's  
14 the majority of your motion.

15 MS. KRAPACS: Sure.

16 THE COURT: What is it that you want to argue  
17 that you think would support striking the motion?

18 MS. KRAPACS: Opposing counsel made the  
19 statement that the respondent and I never lived  
20 together. I did also attach with my motion to  
21 strike that there were rent payments that were made  
22 on the apartment that we shared together. I've  
23 actually found additional rent payments that he  
24 made.

25 THE COURT: I'm sorry to interrupt you but

1           you're arguing whether the statements made are  
2           true, not whether the motion should be stricken.  
3           To me that seems like two different issues. You're  
4           suggesting that he can't prove these facts or that  
5           they're misstatements of fact.

6           MS. KRAPACS: Sure. So I apologize. I  
7           suppose I should have done it separately with a  
8           response, then a motion to strike the specific  
9           words.

10           There was one statement that opposing counsel  
11           alludes to to some separate cause of action  
12           although he gives no facts or data or anything  
13           supporting that statement. That was what I wanted  
14           to have stricken from the record.

15           THE COURT: Can you tell me which portion of  
16           the motion you're referring to?

17           MR. WILLIAMS: Paragraph 5 of my motion  
18           alludes to it.

19           THE COURT: Paragraph 5? The last sentence?

20           MS. KRAPACS: Sure, the last sentence. If  
21           opposing counsel would like to add to that if  
22           there's something on the record that opposing  
23           counsel would like to put on the record that would  
24           be fine with me. The way that it's phrased it's  
25           vague and alludes to something that you can only

1           guess from the record what that alludes to and I  
2           think it's inappropriate.

3           THE COURT: Okay. Mr. Williams?

4           MR. WILLIAMS: Nothing else to add. I think  
5           the statement speaks for itself and in reality,  
6           Judge, I don't think this goes one way or another  
7           as to whether or not there's jurisdiction.

8           THE COURT: True or not true, I can't imagine  
9           how the truth of that statement or existence or  
10          nonexistence of some other cause of action would be  
11          at all material to these proceedings. It's not  
12          going to affect the result in this hearing. And  
13          it's not scandalous. It's a suggestion that -- I  
14          don't know that it was necessary. So to that  
15          extent I can't imagine how I would consider it, but  
16          I'm not going to strike it. I don't know that it's  
17          -- I don't think it should be stricken but there's  
18          nothing there that's going to be a factor in this  
19          case, so there's nothing I need to consider about  
20          that.

21          MS. KRAPACS: Okay.

22          THE COURT: So you don't need to worry about  
23          attempting to disprove that.

24          MS. KRAPACS: Sure.

25          THE COURT: Anything else you wanted to argue

1 with regard to your motion to strike?

2 MS. KRAPACS: Yes. So nothing -- well --

3 THE COURT: Any other portions of the motion  
4 you think should be stricken?

5 MS. KRAPACS: There are statements that are  
6 not factual but I can argue those --

7 THE COURT: Okay.

8 MS. KRAPACS: -- instead of requesting that  
9 they're stricken. That's fine.

10 THE COURT: All right.

11 MS. KRAPACS: Your Honor, I apologize, I'm  
12 representing myself. I am an attorney but I've  
13 never practiced in Florida. I just moved here and  
14 I've never actually litigated so I'm trying my  
15 best. I'm very scared and just trying to navigate  
16 my way through.

17 THE COURT: Well, there are probably easier  
18 ways to get your feet wet in a litigation court  
19 than representing yourself but, you know, sobeit.  
20 Here you are.

21 Okay. Mr. Williams.

22 MR. WILLIAMS: Judge, I'm traveling under  
23 Florida Statute 741.30(6)(d)(3), and Florida  
24 Statute 48.193 which talks about personal  
25 jurisdiction. I cited in my motion the fact that

1           741.30(6)(d)(3) explicitly requires that the trial  
2           court have personal jurisdiction over the parties  
3           to the injunction. More specifically that section  
4           states that "a temporary or final judgment on  
5           injunction for a protection against domestic  
6           violence entered pursuant to this section shall on  
7           its face indicate that the Court has jurisdiction  
8           over the parties and matter under the laws of  
9           Florida and that reasonable notice and opportunity  
10          to be heard was given to the person against whom  
11          the order is sought sufficient to protect that  
12          person's right to due process."

13                 Further, Florida Statute 48.193 says that  
14                 "personal jurisdiction lists the limited  
15                 circumstances in which a person who is not a  
16                 resident of this state may be subjected to the  
17                 jurisdiction of this state's court. These  
18                 circumstances include among other things when the  
19                 person carries on business in the state, commits a  
20                 tortious act within the state or has an interest in  
21                 the property with the state circumstances  
22                 specifically in connection with alimony, child  
23                 support and paternity proceedings, and when this  
24                 person engages in substantial and isolated activity  
25                 in the state."

1           There's nothing in petitioner's petition which  
2           specifically indicates other than Mr. Knoop has  
3           helped her move to the state of Florida or assisted  
4           her in moving to the state of Florida in 2017, in  
5           the August/September/October area of 2017. In fact  
6           the petition specifically alleges that any of the  
7           alleged conduct that had occurred, occurred outside  
8           the state of Florida; occurred in either the  
9           District of Columbia, Ohio or New York, and  
10          occurred in or about the year 2015.

11          In petitioner's motion to strike, more  
12          specifically page 4 second paragraph, there's a  
13          sentence that the petitioner admits even though  
14          those acts did not occur in Broward County and were  
15          not recent.

16          Now Mr. Knoop does not have any minimal  
17          contacts with the state of Florida. He does not  
18          conduct business here, he doesn't own a home here,  
19          he doesn't own real estate, he has no banking or no  
20          financial transactions here.

21          In the petition for injunction in fact the  
22          petitioner alleges that the resident address of Mr.  
23          Knoop is in Dallas, Texas. There are no  
24          indications at all that he has any personal  
25          contacts with the State of Florida.

1           I cited in my motion to three cases. I  
2           provided those cases to the Court when I sent a  
3           copy of the motions to the Court. The first case  
4           is Youssef, Y-O-U-S-S-E-F, v. Zaitouni,  
5           Z-A-I-T-O-U-N-I. It's a new case out of the Second  
6           District 2018 WL 844062. In that case you had  
7           respondent's family residing in the state of  
8           Florida. There were child support allegations and  
9           other allegations of perhaps domestic violence to  
10          which the Second District Court of Appeal said no,  
11          no, no, you can't do that, it's not going to  
12          happen, there's no minimum contact, nothing  
13          happened in the state of Florida. Even with those  
14          minimum conducts which are greater in the Youssef  
15          case than what Mr. Knoop has here they dismissed it  
16          because the Long-Arm Statute 48.193 does not permit  
17          a domestic violence injunction in this particular  
18          state.

19          They also cite to Two Worlds United v.  
20          Zylstra, Z-Y-L-S-T-R-A, at 46 So. 3d 1175. Also  
21          specifically discussing substantial not isolated  
22          activity in the state is sufficient to support the  
23          exercise of general jurisdiction over nonresident  
24          is that which is continuous and systematic. And  
25          that they cite to Florida Statute 48.193(2), and

1           they conducted analysis in there and again, Mr.  
2           Knoop doesn't even meet the criteria in there.

3           And also there's a Supreme Court of Florida  
4           case Wendt v. Horowitz at 822 So. 2d 1252.  
5           Although these three cases I provided to the Court  
6           they talk about the Long-Arm Statute, the physical  
7           presence in Florida is not required to commit a  
8           tortious act, and what the criteria are for  
9           committing a tortious act in this state. Nothing  
10          being alleged in the petition creates any type of  
11          tortious act in the state of Florida.

12          There's an additional case, if I may approach,  
13          Judge.

14          THE COURT: Yes, sir. Do you have a copy for  
15          the petitioner?

16          MR. WILLIAMS: I do.

17          THE COURT: Thank you.

18          MR. WILLIAMS: This case is Becker v. Johnson,  
19          and this is actually more interesting because this  
20          case may be closer to the facts here. It's at 937  
21          So. 2d 1128 out of the First District 2006. What's  
22          interesting in this case, Judge, is that you have a  
23          husband and wife or boyfriend and girlfriend that  
24          were involved in a relationship in Maryland, and in  
25          Maryland three weeks prior to the injunction being

1           filed in Duval County, Florida, there was an  
2           incident where the respondent is alleged to have  
3           busted out the window with a crowbar as the  
4           petitioner was sitting inside and a report was made  
5           to the Maryland state police. The petitioner being  
6           fearful came to the state of Florida and filed an  
7           injunction in the state of Florida. The Court said  
8           you can't do that. The tortious act occurred in  
9           Maryland, and therefore it has to be filed in  
10          Maryland. And what they said which I found very  
11          interesting is that the Federal Statute 18 United  
12          States Code 2265 permits an injunction to be in  
13          full force and effect anywhere in the United  
14          States. So if the petitioner in the Johnson case  
15          had applied for and received an injunction in the  
16          state of Maryland and moved to Florida, then  
17          Florida would enforce that injunction in the state  
18          of Florida because of the Full Faith and Credit  
19          Statute as enunciated in the federal court system  
20          under 18 U.S.C. 2265.

21                 If the petitioner in this case wanted to get  
22          an injunction she could have gone perhaps to New  
23          York if something happened in New York, and Ohio  
24          something happened in Ohio, and clearly in the  
25          District of Columbia if something happened there,

1           and then if something happened here in the state of  
2           Florida, where the respondent in this case had  
3           committed some type of tortious act, then that  
4           injunction would be in full force and effect. It  
5           would be a violation of the injunction, clearly  
6           have some contempt proceedings here in the state of  
7           Florida either criminal or in violation of  
8           injunction before this court or any other judge  
9           that's sitting in a contempt capacity. But there  
10          is nothing in the four corners of the petition  
11          filed by petitioner where it alleges at all that  
12          Mr. Knoop has any type of minimum contact with the  
13          state of Florida let alone Broward County. So  
14          therefore under the cases I just cited to the Court  
15          this Court does not have any personal jurisdiction  
16          and the temporary injunction has to be dismissed.

17                 THE COURT: Okay. Thank you, Mr. Williams.

18                 So, Ms. Krapacs, be happy to hear your  
19          response. It seems to me the issue is whether the  
20          Court has personal jurisdiction, that is in the  
21          state of Florida, and it's being argued by  
22          Mr. Williams that you would have to allege and  
23          ultimately prove that either some act of violence  
24          or some tortious act, some claim you're making in  
25          the petition occurred in the state of Florida or

1           that the respondent has minimum contacts in the  
2           state of Florida that would allow the Court to take  
3           jurisdiction over him as a person. And you've  
4           heard the arguments with regard to the case law and  
5           the statutes. So what do you want to tell me about  
6           that?

7           MS. KRAPACS: Sure. I want to start by saying  
8           I did file a motion to amend my petition several  
9           weeks ago, it just hasn't been ruled on. The basis  
10          for that is I have several reason for filing that  
11          and I explained the basis in the filing. One of  
12          the reasons was that when I filed it, the  
13          information I included --

14          THE COURT: Let me stop you just real quick.  
15          I do see the motion now, and while perhaps when I  
16          looked at this at the pleadings for this hearing  
17          before I may have noticed it but I don't believe I  
18          did. Did you ever ask the Court to set that matter  
19          for hearing?

20          MS. KRAPACS: I asked the clerk's office what  
21          the next step was and they said I'd get something  
22          in the mail when you ruled. They didn't tell me to  
23          ask for a date. The reason that I did that for one  
24          thing was when I filled out, when I completed the  
25          petition I completed, I added information that

1           tended to prove the criminal acts. I did not  
2           include additional information. There's actually  
3           one page of it where I put the acts. I mentioned  
4           the acts occurred in my petition here, I alluded to  
5           events that occurred in Broward County. So the  
6           pages of my petition aren't numbered but it's the  
7           first page of my handwritten statement August 15  
8           through the present Washington D.C. and Fort  
9           Lauderdale, but then I was focused on just the  
10          criminal acts. And in my stress of that day I did  
11          not include the events that actually did occur in  
12          Broward County, and so in talking to several  
13          attorneys, I can't afford counsel right now but I  
14          have had attorneys who kindly, you know, have given  
15          me just kind of broad advice, they advised me to go  
16          back and amend because they said anything found in  
17          the petition will not come in when I have a hearing  
18          on the merits. So I wanted to include information  
19          on that. I also wanted to include information from  
20          the whole scope of our relationship to demonstrate  
21          the five-year pattern of abuse that has cycled over  
22          and over. The reason that I wanted to make that  
23          more clear and to broaden that was that  
24          Mr. Williams had sent me a letter threatening to  
25          file a motion for sanctions against me based on

1           this petition if I didn't dismiss my case in 21  
2           days. And I asked his basis and I asked for a line  
3           item list of what he was alleging was false or  
4           misleading from my petition and I did not get a  
5           response from him. So because of that I also  
6           wanted to just include everything, every detail,  
7           every fact that I have to demonstrate the cycle of  
8           abuse so that there's no chance that this -- so  
9           that I bring all the ammunition that I have given  
10          that that was a tactic that was used against me.

11           THE COURT: Okay. I'm sorry to interrupt you  
12          but I want to address how we're going to proceed  
13          here.

14           MS. KRAPACS: Sure. So there were acts --

15           THE COURT: I can't really explain why you got  
16          the advice you received from whatever clerk or  
17          assistant clerk you spoke with, but typically when  
18          a motion is filed for relief the next step is to  
19          seek a hearing unless you receive an order granting  
20          that relief. So because there was no request for a  
21          hearing in my office it wasn't set in advance for  
22          today or set for today for that matter. The  
23          pleading upon which Mr. Williams' motion was filed  
24          was your initial petition. You haven't amended  
25          your petition because you haven't had leave to nor

1           did you just choose to attempt to amend it without  
2           leave, which is sometimes done. So all I can do at  
3           this point would be to address the motion filed by  
4           Mr. Williams as it applies to the only petition  
5           that the Court has, and the other option would be  
6           if you have an amended petition that you've  
7           prepared and Mr. Williams is willing to waive any  
8           due process concerns he has in order to prepare I  
9           could do it that way. But otherwise I'm going to  
10          have to -- this might be a two-step process. I'll  
11          rule on his motion. If it's denied I guess it's  
12          not something to worry about and you could still  
13          amend to include those things that you somehow  
14          neglected to. And if it's granted you would have  
15          to file either an amended or start a new case by  
16          filing another petition. But that's the only way  
17          we can do it. You haven't prepared an amended  
18          petition I take it, right?

19                 MS. KRAPACS: No.

20                 THE COURT: Okay. So I think we're limited in  
21          how we're going to proceed.

22                 MS. KRAPACS: Sure.

23                 THE COURT: We're just going to address the  
24          petition that you filed. And I understand that  
25          there may be further proceedings depending on the

1 ruling of the Court today, but we're going to be  
2 limited to that.

3 MS. KRAPACS: Sure. And I apologize, Your  
4 Honor, I did do a clerkship in D.C. Superior Court  
5 and the process that we followed that often motions  
6 that were filed in between hearings were done in  
7 chambers, and so I wasn't aware and I asked the  
8 clerks and they said --

9 THE COURT: That's fine. You don't have to  
10 explain any further. That's okay.

11 MS. KRAPACS: So going back to my petition I  
12 did note through the present Fort Lauderdale. The  
13 respondent does have contacts with Florida,  
14 frequent contacts with Florida. We, in the five  
15 years that we were together we often traveled to  
16 Florida at least once a year, sometimes more often.  
17 His sister lives in Miami, his only sister. There  
18 are only two siblings. He does have contacts here.

19 Opposing counsel in his motion even admitted  
20 that he travels often for work. He has the means.  
21 I'm not in contact with him. I don't know how  
22 often he travels but he does have contacts here in  
23 Florida.

24 On the same note, and again, there were some  
25 activities that occurred that were not in my

1           petition, when I moved here in October he helped  
2           me --

3           THE COURT: We're limited to what's in your  
4           petition so please restrict your argument to those  
5           allegations.

6           MS. KRAPACS: Okay. So he has -- I have  
7           referenced he's filed false police reports. He's  
8           taken it upon himself to contact the Fort  
9           Lauderdale Police Department and file those  
10          reports. He's now claiming he has no contacts with  
11          this jurisdiction but he has been in contact with  
12          the police department here on more than one  
13          occasion. I know that for sure. I actually asked  
14          the officer who handled the report how many  
15          contacts he's had with Mr. Knoop and the officer  
16          was not able to give me the number of contacts but  
17          said it has been more than once since his initial  
18          police report was filed.

19          THE COURT: You used the pleural. Again, I'm  
20          sorry to interrupt you, but you said he has filed  
21          false police reports, pleural.

22          MS. KRAPACS: Yes. He --

23          THE COURT: Hold on. Hold on. One thing  
24          you're going to have to learn if you're going to  
25          start litigating is let the judge finish what he's

1           going to say. Both in Dallas where he lives and  
2           here in Fort Lauderdale. So it's unclear to me  
3           whether you're alleging one or more than one but  
4           you're saying he's filed a police report which you  
5           claim to be false at least one which is in Fort  
6           Lauderdale. So can you explain to me or argue to  
7           me why it is that filing a police report false or  
8           not false in Broward County would establish  
9           personal jurisdiction over the respondent?

10           MS. KRAPACS: He seeks to have the protections  
11           and use their services yet doesn't want to be --  
12           doesn't seem to want to answer to this case. I  
13           have attempted to get him served. I also filed a  
14           motion for personal service.

15           THE COURT: Anything else you want to tell me  
16           about the police report and how that might  
17           establish personal jurisdiction over the  
18           respondent?

19           MS. KRAPACS: I'm not sure why he called the  
20           Fort Lauderdale Police Department. I cannot tell  
21           you what his logic is in this. He filed a Dallas  
22           police report and one in Fort Lauderdale.

23           THE COURT: And I'm sorry to keep interrupting  
24           you but it doesn't state it in the pleading but are  
25           you suggesting that what you're alleging here is

1           it's a police report that was made concerning some  
2           event involving you and him?

3           MS. KRAPACS: So he said -- yes, he filed a  
4           report alleging that I was harassing him. After I  
5           confronted him about the abuse that he subjected me  
6           to he hired a law firm in Texas and then filed  
7           these police reports alleging that I was harassing  
8           him. So he didn't file that based on any -- like I  
9           guess just the fact that I lived here was why he  
10          filed that. That there's no mention in his report  
11          of a physical act happening here but he keeps  
12          calling them and demanding they investigate  
13          something but he's making contacts with this  
14          jurisdiction repeatedly.

15          THE COURT: This report or these reports that  
16          you say were filed in Fort Lauderdale, they're not  
17          part of your petition, at least I don't see that  
18          they were.

19          MS. KRAPACS: No.

20          THE COURT: And if I missed it, you tell me,  
21          did you file any type of supplemental notice of  
22          filing to submit those reports to the Court?

23          MS. KRAPACS: No, I didn't.

24          THE COURT: Okay.

25          MS. KRAPACS: I have them and I filed a

1 response on the police report but I did not file  
2 the original petition. I didn't know I was able  
3 to.

4 THE COURT: All right. Thank you for  
5 answering those questions. What else did you want  
6 to argue against the motion?

7 MS. KRAPACS: Regarding personal service --

8 THE COURT: Well, jurisdiction.

9 MS. KRAPACS: Jurisdiction, opposing counsel  
10 also argues in his motion that, you know, they  
11 don't have personal jurisdiction because he hasn't  
12 been served. I've been attempting to personally  
13 serve him through the law enforcement there and --

14 THE COURT: Let me stop you. I think we need  
15 to set that aside. If we've got jurisdiction over  
16 him I'll give you ample opportunity to try to serve  
17 him as long as you're making a diligent effort and  
18 it appears as though you might be able to serve  
19 him. I don't have a problem with that. That's  
20 really not the issue for today as far as I'm  
21 concerned. It's whether the Court has  
22 jurisdiction. So even if you serve him can he be  
23 held -- can we issue some order that's binding upon  
24 him, and it really gets back to that same issue  
25 whether we've got personal jurisdiction.

1 MS. KRAPACS: Sure. While the respondent is  
2 here in South Florida often. He has a sister in  
3 Miami. In my history of knowing him he's traveled  
4 down here frequently. He enjoys the warm climate.  
5 His long-term plan, actually in our relationship  
6 our long-term plan was to live in Florida and I  
7 just decided to do it on my own. So I don't know  
8 if that's still his plan but that was definitely  
9 our plan. And actually this year was the year it  
10 was going to happen. His son goes to college and  
11 the house that he co-owns with his exwife gets sold  
12 and I don't know if that will be the move, that  
13 will be the time that he decides to move here. I'm  
14 not sure but I know his five-year plan when we met  
15 five years ago was to live in Florida as of this  
16 year. That has always been his plan. And again,  
17 his sister lives here. He travels here often.  
18 Admittedly in the motion he travels often for work.  
19 I guess that's all I have to say on that issue.

20 THE COURT: Okay. So you agree that the  
21 petition doesn't allege any act of violence here in  
22 Florida, either physical or stalking?

23 MS. KRAPACS: The petition does not, no.

24 THE COURT: All right. Mr. Williams, do you  
25 have any response?

1           MR. WILLIAMS: Just briefly, Judge. I don't  
2           think what's going to happen in the future or  
3           apparently whatever they discussed in their  
4           relationship has anything to do with personal  
5           jurisdiction. And I addressed the issue in the  
6           motion the sister that lives in Miami. He said he  
7           has a sister in Miami. He hasn't been down here to  
8           see her in a number of years. He does see her but  
9           in New York or she comes to visit in Dallas, but  
10          other than that there's nothing in Broward County  
11          let alone the state of Florida, which I address in  
12          my motion and I don't see how this Court has  
13          personal jurisdiction.

14          THE COURT: I agree. I don't think we do.  
15          I'm going to grant the motion but I want you to  
16          know that's without prejudice to you to amend your  
17          petition or file another petition should there be  
18          allegations that you can make that you think does  
19          import upon the state personal jurisdiction over  
20          the respondent. So certainly you have an  
21          opportunity to do that. If you are -- I guess we  
22          should address this since we're here, Mr. Williams,  
23          did you receive a copy of the motion for leave to  
24          amend?

25          MR. WILLIAMS: No, because, Judge, I filed a

1 motion for personal jurisdiction, to dismiss the  
2 personal jurisdiction. I have not filed a notice  
3 of appearance as attorney of record.

4 MS. KRAPACS: I'm sorry, did you just say --

5 THE COURT: I understand.

6 MS. KRAPACS: I'm sorry, did opposing counsel  
7 say he never received that?

8 THE COURT: Well, the answer was --

9 MR. WILLIAMS: I know it's been filed. I went  
10 to the clerk's office to obtain a copy. They would  
11 not give it to me because they would not, because  
12 I'm not attorney of record.

13 MS. KRAPACS: I'd like to confirm for the  
14 record I emailed it to --

15 THE COURT: One moment. Don't interrupt,  
16 please. Go ahead.

17 MR. WILLIAMS: I never got -- I got the motion  
18 to amend. Yes, the petitioner is right, I did get  
19 the motion to amend. She did email it to me.

20 THE COURT: You're not representing with  
21 regard to that?

22 MR. WILLIAMS: For purposes of today's hearing  
23 only I'm representing him for the motion to dismiss  
24 for personal jurisdiction.

25 THE COURT: You're not prepared to address

1           that for today? You've not been retained.

2           MR. WILLIAMS: If the Court is dismissing --

3           THE COURT: I am.

4           MR. WILLIAMS: All right. The Court is  
5           granting my motion I should say so there's no  
6           personal jurisdiction over him so I think the  
7           petitioner has to file and start all over again.

8           THE COURT: She's got to file an amended  
9           petition and that doesn't require a leave to amend  
10          frankly.

11          MR. WILLIAMS: Sure.

12          THE COURT: You can file another petition  
13          that's going to be given a new case number. So it  
14          wouldn't be referred to as an amended petition.  
15          It's going to be just a petition. And you'll have  
16          the opportunity to allege whatever it is you think  
17          is appropriate to allege.

18          MS. KRAPACS: I'm sorry, Your Honor, you said  
19          it's not an amended, it's just a new case?

20          THE COURT: It's not amended in the same case.  
21          It's going to be a new case. You're going to get a  
22          new case number.

23          MS. KRAPACS: Okay.

24          THE COURT: I think that's how the clerk is  
25          going to do it unless I'm mistaken about their

1 process but my belief is they'll probably give it a  
2 new case number and they'll accept it as an  
3 original petition in that case.

4 But just so it's clear in case it's brought up  
5 by the respondent, either Mr. Williams or someone  
6 on his behalf, the motion granting or the order  
7 granting this motion to dismiss is without  
8 prejudice for you to file appropriate petitions if  
9 you feel you can do that. Obviously you are going  
10 to have good faith to file it and if you do, by all  
11 means, get it filed.

12 MR. WILLIAMS: Which means when you say good  
13 faith it has to be some sort of tortious conduct  
14 that occurred.

15 THE COURT: Well if it wasn't understood  
16 before it's understood now what's required under  
17 the statute with regard to personal jurisdiction.  
18 So if you, ma'am, in good faith think the Court has  
19 personal jurisdiction --

20 MS. KRAPACS: Yes.

21 THE COURT: -- you know, then you can file  
22 another petition. I would suggest if you don't in  
23 good faith believe that, that you shouldn't waste  
24 your time.

25 MS. KRAPACS: Of course.

1           THE COURT: Obviously there may be sanctions  
2           to be considered. So I'll leave that up to you.

3           MS. KRAPACS: Of course, Your Honor. And I  
4           would like to say I don't want to appear on the  
5           record as though I did something improper.  
6           Everything I filed on the record I did also send to  
7           Mr. Williams' email address that was in the letter  
8           that he sent me and also the email address that's  
9           registered with The Florida Bar. So I understand  
10          now I'll have to ask for a hearing in the future  
11          when I file a motion, so I appreciate that.

12          THE COURT: Anything else we need to address?

13          MR. WILLIAMS: No. Does the Court prepare the  
14          order or do I?

15          THE COURT: I'll prepare the order and we'll  
16          give that to you in just a minute. We'll go off  
17          the record. Thank you. Thank you, madam reporter.

18          (Thereupon, the hearing was concluded at  
19          2:39 p.m.)

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## 1 C E R T I F I C A T E

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3 STATE OF FLORIDA )  
4 COUNTY OF BROWARD )

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6 I, Sandra Rossi, Court Reporter, State of  
7 Florida at Large, certify that I was authorized to and  
8 did stenographically report the forgoing proceedings and  
9 that the transcript is a true and complete record of my  
10 stenographic notes.

11

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13 Dated this 24th day of April, 20

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*Sandra Rossi*  
Sandra Rossi, Court Reporter

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The Florida Bar's  
Exhibit K

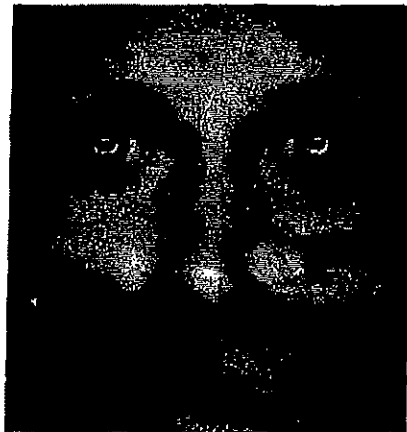

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## Ashley Ann Krapacs, PLLC

### Be Empowered Blog

# When You Don't Let Female Lawyers Talk, We'll Only Get Louder

April 23, 2018 | Ashley Krapacs



This past August, Shira A. Scheindlin, a retired Federal District Court judge, wrote an Op Ed in the New York Times entitled, "Female Lawyers Can Talk, Too." Ms. Scheindlin describes what she witnessed during her more than two decades on the bench in New York.

"The talking was almost always done by white men. Women often sat at counsel table, but were usually junior and silent. It was a rare day when a woman had a lead role — even though women have made up about half of law school graduates since the early 1990s."

Ms. Scheindlin's article contains a call to action to level the playing field for women in the courtroom. She suggests that clients demand diversity in the legal teams that represent them. She says that law firms should do more to diversify their litigation teams, including guaranteeing that junior female lawyers participate in depositions to the same extent as their male counterparts. She encourages judges to insist that lawyers argue their own briefs, since female attorneys are often the authors of briefs that are then argued by male attorneys.

There's no question that female lawyers can talk, too. However, Ms. Scheindlin seems to suggest that the problem lies with women not getting the opportunity to participate in court proceedings. I agree and

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## Archive

April 2018 (3)

would add to that: even when women are given the opportunity to participate in court, too often, they aren't permitted to. Too often, they're silenced and stifled and shushed. Too often, they're talked over and talked down to and ganged up on to by all the other white men in the courtroom.

That's exactly what happened to me in a recent hearing.

Opposing counsel was an old white male. The judge was an old white male. I left the hearing feeling like I'd been completely sandbagged. I felt completely deflated. Like I really had to work on my courtroom skills. Like my performance had caused me to lose the hearing.

Something about the hearing really rubbed me the wrong way, though, and I couldn't let it go, so I got a recording of the hearing and listened to it. And I realized I had conducted myself the best that I possibly could have. I realized that I should be proud for how I stood my ground and didn't waiver. And I realized that I was going to lose that hearing regardless of how strong my argument was.

The bias in that hearing was so subtle, I didn't fully detect it in the moment. But after listening to the recording, it was clear as day. One exchange during the hearing was so egregious, I had to listen to it over and over because I simply could not believe what had transpired. Here's a brief summary of the events that led up to the hearing, to give you some context.

I had filed a motion to amend my original petition to include information that would have cured the grounds for opposing counsel's motion to dismiss, which is what this particular hearing was scheduled for. My motion was filed *before* opposing counsel's motion, but it never got ruled on, and it wasn't scheduled for a hearing like opposing counsel's was. The court still has not provided me with a valid explanation for why my motion never got ruled on, or why opposing counsel got a hearing on his motion and I didn't.

Regardless, the judge decided not to let me discuss the additional information during the hearing, decided not to continue the hearing until I had time to amend, decided not to rule on my motion for leave to amend, and he granted opposing counsel's motion to dismiss. During the hearing, anticipating I'd refile my case (I did), the judge inquires whether opposing counsel was aware of my prior motion.

Judge to opposing counsel: "Mr. X, did you receive a copy of the motion for leave to amend?"

Opposing Counsel: "No, because, judge, I filed a motion for personal jurisdiction, to dismiss for personal jurisdiction, I have not filed a notice of appearance as attorney of record."

Me: "I'm sorry, did opposing counsel say he never received that?"

Opposing Counsel: "I know it's been filed, I went to the clerk's office, to obtain a copy, they would not give it to me because they would not, um. Because I'm not attorney of record."

Me: "I'd like to confirm for the record I emailed it to..."

Judge interrupts me mid-sentence: "One moment. Don't interrupt, please."

It's clear from the recording that when I start my sentence, "I'd like to confirm," no one else was speaking as I began talking. Yet the judge

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interrupts me, scolds me for interrupting (which I didn't do), then proceeds to allow opposing counsel to continue speaking, at which point opposing counsel *repeats his lie twice more* before coming clean. The judge is balling him out, and he just keeps digging himself deeper and deeper!

Opposing Counsel: "I didn't get. I never got. Uh, I the motion to amend. Yes, she, Petitioner is right. I did get the motion to amend. You're right. She did email it to me."

So maybe that's why firms are sending their male attorneys to step up to the plate instead of females. The reality is, in too many courtrooms, the males are getting preferential treatment. And I suspect this sort of stuff is happening in courtrooms across the country more often than we realize or would like to admit.

It wasn't until later in the hearing, after the subject had been changed already, that the judge permitted me to finish my statement that I had emailed the motion to amend to opposing counsel, to the email address he has registered with the Florida Bar, and that I included him on the court's e-service list. I was proud of myself that despite the fact that the judge wasn't thrilled I caught opposing counsel in a lie and wanted to emphasize it for the record, I stood my ground and refused to be silenced and bullied.

The problem runs so much deeper than Ms. Scheindlin seems to suggest. The Old Boys' Club is alive and well in 2018. I don't think the judge who tried to silence me is a bad man. He likely would say and probably believes that he is not biased or sexist. However, his treatment of me proves otherwise. We wouldn't have even been in that hearing if he had acknowledged and acted on my motion for leave to amend the petition. When this sort of unconscious bias is permitted to permeate our judiciary, there's no amount of diversification at law firms that is going to correct the harm that is being done to female litigators and to our profession as a whole.

It's not just about getting women the opportunity to advocate for their clients in the courtroom, it's also about ensuring that they receive the same treatment in court as their male counterparts do.

So what can be done? Unfortunately, it's on us female attorneys to ferret out this treatment and hold the judiciary accountable. We have to keep an eye out for this type of treatment. What I experienced was so subtle. The judge spoke so softly and even-keeled, he seemed kind and fair in the moment. When he gently told me not to interrupt, my immediate reaction was to stop talking, and I felt embarrassed that I had interrupted someone. It never crossed my mind that I hadn't actually done what he was saying I did.

There's a term for this. It's called gaslighting. Causing someone to doubt themselves so they believe they've done something they actually haven't. And I wouldn't have known that that's what was going on if I hadn't listened to the recording. But when you're litigating and trying to advocate, it's hard to see that in the moment.

My suggestion is that if you leave a hearing and you have a nasty feeling about it, get a copy of the transcript or the recording. Heck, in my case, even a transcript would not have revealed that I hadn't actually interrupted anyone. The transcript would have actually made it seem like I had! So get a recording. Listen to it. Take notes about what you think might have been off during the hearing. Ask a colleague to listen to it and give you their opinion. And if something seems improper, do something about it. File a motion to reconsider. File a

4/23/2018

When You Don't Let Female Lawyers Talk, We'll Only Get Louder | Ashley Ann Krapacs | Florida | Sexual Harassment Lawyer

motion to recuse. File a complaint. Cumbersome, I know. And expensive—getting a recording and transcripts for a 30 minute hearing cost me over \$200. But it's necessary.

Sadly, we have become so accustomed to this treatment, we don't even realize it's happening. It's so subtle yet so effective. Becoming aware of it, taking steps to stop it, and holding abusers accountable, even though that can be risky, is the only way it's ever going to end.

Female lawyers can talk, too. And if you don't let us, we're only going to get louder.

*Ashley Ann Krapacs is an attorney licensed in New York, Florida, and DC. She practices employment law in south Florida. She also runs an online bar exam coaching business, Stress Less Achieve Success Bar Exam Coaching. This article is not intended be legal advice.*

Tags: women's rights bullying

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The Florida Bar's  
Exhibit L

5/14/2018

Bad Attorney Behavior: If You See It, Report It | Ashley Ann Krapacs | Florida | Sexual Harassment Lawyer



5/14/2018

Bad Attorney Behavior: If You See it, Report It | Ashley Ann Krapacs | Florida | Sexual Harassment Lawyer

"Filing a complaint against an attorney is a serious matter. Do so only as

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a screenshot of my private Facebook account, which shows him viewing my profile while very clearly logged in to Facebook as woman named, "Michelle." So he admitted to the Florida Bar that he is Facebook stalking the private Facebook profile of a domestic violence victim. He put a domestic violence victim's safety in jeopardy and accessed her private Facebook account through fraudulent means, and then had the gall to advertise that he had done so to the Florida Bar, as if such conduct is par for the course.

If it is, no one is safe. This man has been practicing for over 30 years. I cannot fathom how many female domestic violence victims and opposing counsel have been sandbagged and railroaded by this bully. My heart breaks. But I remain hopeful the Florida Bar will conduct a full investigation and take proper action.

This type of sexism and bullying has absolutely no place in the practice of law, and I will make it my mission to eradicate it to the fullest extent that I can. Female attorneys and parties deserve the same amount of respect and civility in this profession as anyone else does. And if attorneys who are stuck in the past do not wish to adhere to the codes of conduct in their respective jurisdictions, they should retire or find a new field.

The more we let stuff like this happen without holding violators accountable, the more it will continue to pervade our profession and prohibit females' access to justice. Despite the risks, despite how time-consuming the process is, despite how exhausting it is to get personally attacked by an attorney who is facing a complaint I've filed, I'm taking hard stance against this bullshit. It ends with me. Who's with me?

The Florida Bar's  
Exhibit M

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1           Transcription of YouTube Video of Ashley  
2           Krapacs.

3                               - - - - -  
4

5           ASHLEY KRAPACS: Good afternoon, everyone. I  
6           hope you're having a wonderful week. My week has  
7           been interesting, to say the least, and kind of  
8           hilarious, quite honestly. I have been laughing a  
9           lot. I can't stop laughing since I read this  
10          complaint that has been filed against me on me  
11          behalf of Russell J, Williams. This complaint  
12          [indicating]. Russell J. Williams of Williams,  
13          Hilal, Wigand, Grande Law Firm.

14          This case is completely frivolous. I  
15          can't -- I'm sorry, I can't even like -- I'll  
16          try to regain my composure because I want to  
17          keep this professional. It is completely  
18          frivolous. I can't say I am surprised.  
19          Mr. Williams has been threatening this for quite  
20          some time. Every time I posted a video, he has  
21          e-mailed the Florida Bar ex-parte and demanded  
22          an emergency meeting immediately to reign me in,  
23          and various other sexist and really horrific  
24          phrases he has used to demand that I stop  
25          writing and making videos.

1           So he has been threatening this for a  
2 while. Of course he kept saying he was going to  
3 file an injunction in federal court, which is --  
4 which is comical. He did not, in fact, file in  
5 federal court. He filed this in county court  
6 here in Broward. And, boy, oh, boy, is it a  
7 doozy. Twenty-five pages of garbage, lies, fake  
8 news. He's seeking damages in excess of  
9 \$50,000. I'm sorry, you guys, I can't even --  
10 for what? We really can't be sure. \$50,000,  
11 though, in excess.

12           The complaint is just riddled with lies and  
13 other nontruths. I mean, it is really just  
14 obscene. And, again, it is not shocking since  
15 lying on the record is just what Mr. Williams  
16 does best.

17           He says that I posted on social media about  
18 him lying on the record at a hearing, and that  
19 isn't true. Which is just like bizarre because  
20 I have -- I have the court recording and the  
21 official court transcript of that hearing that  
22 confirms his lies.

23           He alleges that I posted an article about  
24 his lies in a -- in something called  
25 Ms. Esquire. He made this allegation a number

1 of times. And every time I just laugh because,  
2 like, I don't know who's giving him this  
3 information, but it is, like, completely  
4 inaccurate. And I don't know what the fuck  
5 Ms. Esquire is even. It is actually in this  
6 complaint, like a signed sworn document. Truly,  
7 I don't know what Ms. Esquire is. If I posted  
8 there, I would proudly admit it. Apparently  
9 they have 7,000 followers in Ms. Esquire and  
10 maybe I should be part of this group and maybe I  
11 should go on. But, like, I would proudly admit  
12 it if I posted in a group called Ms. Esquire,  
13 but I didn't.

14 I did Google Ms. Esquire and learned that  
15 the same thing he's speaking of, there is a  
16 closed Facebook group called Ms. Esquire. I  
17 never have been a member. You do have to  
18 request permission to join and to post anything.  
19 I have never -- I have never been a member, I  
20 never requested to join. I never had the  
21 ability or the opportunity to post within that  
22 group. So he's clearly got no evidence that I  
23 ever posted there because I literally, I never  
24 been in the group and would never have -- like,  
25 even if I really wanted to go on now, like, you

1 can't post in a closed group. Like it's just  
2 hilarious. And he states in a signed sworn  
3 document that I did post in Ms. Esquire. More  
4 lies. This guy just -- he cannot get enough of  
5 lying in formal proceedings. I mean, man, like,  
6 it's just, it's a lie.

7 I just -- he also whines that I call him a  
8 moron and a sexist and a bully. Well, sorry --  
9 I'm not sorry, but you are all of those things.  
10 Also, subjective opinion statements are not  
11 actionable as definition, period. They're just  
12 not. We live in a free world where you're  
13 welcome to be as big of an asshole as you want.  
14 Like, go for it, be the biggest asshole out  
15 there and do it proudly, own it. But you're not  
16 also entitled to confidentiality regarding how  
17 big of an asshole you're being. That's just not  
18 a thing.

19 If you want to torture domestic violence  
20 survivors to make a quick buck and you want to  
21 misuse the procedures of the law to harass rape  
22 survivors, to torment them and try to silence  
23 them, go for it. You're allowed to do that  
24 shit. This shit might work on survivors who are  
25 not as strong as me. It might have the intended

1 effect of getting them to shut up and stop  
2 talking about, honestly, the things that have  
3 happened to them. It might work on some women  
4 because this shit is traumatizing and it's  
5 really fucking painful and hard to go through  
6 and keep reliving. But it doesn't work on me.  
7 I have been through some shit, son, and I ain't  
8 going anywhere. I am strong as fuck.

9 Your bullying tactics don't scare me and  
10 they don't work on me. So I won't be silenced.  
11 I will speak honestly and truthfully about  
12 what's happened to me and I will speak honestly  
13 and truthfully about how the attorneys who have  
14 attacked me for seven months have conducted  
15 themselves, including Mr. Williams. And all  
16 have to live with those consequences. Okay?

17 Um, you know, and there is -- there is  
18 another option here. There is a really easy  
19 option. You could, you know, just stop being a  
20 dick. Like, that's a really simple solution,  
21 just don't be a dick. Um, but men like  
22 Russell J. Williams want to have their cake and  
23 eat it too. Listen, when you have been having  
24 your cake and eating it too for three decades  
25 and it worked and it has made you a lot of

1 money, I guess it would piss you off when  
2 someone comes along and makes it clear that that  
3 just isn't going to work anymore.

4 You know, it pisses him off that he can't  
5 just keep acting a fool and then pretending to  
6 be a good guy. He wants to act like a baby,  
7 bully people around, lie and cheat his way  
8 through cases and then pretend like he's a  
9 decent human being. Sorry, that's just not an  
10 option anymore. It's just not.

11 It is 2018, social media is the thing.  
12 Average everyday people, rape survivors like  
13 myself, have a voice. We count and we matter  
14 and we will speak up about you. And you can  
15 whine and cry all you want and bitch and moan  
16 and make threats and sue us, but we won't stop  
17 because you don't scare us anymore. You don't  
18 scare me. Your power is no good here. It's  
19 gone. Bye, girl. Bye. Ridiculous.  
20 Ridiculous.

21 So I'm not going to go into any sort of  
22 strategy just yet on how I'll be handling this  
23 swell, but I do want to point out one more  
24 hilarious factor about this lawsuit.  
25 Mr. Williams hired a female to represent him in

1 the case. Um, strategic. Wow. He doesn't like  
2 being called a sexist. Sometimes the truth  
3 hurts, especially when you're a big bully baby.  
4 He doesn't like being called sexist. So what  
5 does he do? He files a suit against me and  
6 hires a woman to file it to represent him so it  
7 looks like he's not a sexist. So that, you  
8 know, he found this woman to take the case so he  
9 can go, look, see, I'm not a sexist, me man, she  
10 woman, no sexism. Like, that's just pretty  
11 straightforward; right? If you're barbarian,  
12 sure, that works. Except for the fact that I  
13 have been a woman for almost 33 years and I know  
14 that there are plenty of sexist women out there.  
15 We women all know this. We all have been  
16 stabbed in the back by a fellow female at some  
17 point or another. That sort of behavior is  
18 driven by fear, jealousy and insecurity, but it  
19 is widespread and it is not hard or creative to  
20 find a woman to stab another woman in the back.  
21 It's just not. So, good work. But, you know,  
22 you're not unique and your tactic is not  
23 working. It has actually quite backfired.  
24 So I'm not surprised at his strategy, but  
25 I'm amused because this woman actually claims to

1 be a supporter of women's rights. Just because  
2 you're female, like what the fuck? Are you  
3 kidding me? Are you for real right now? Like  
4 are you for real? Just because you're a woman  
5 doesn't mean you're a supporter of women's  
6 rights. To say you're a supporter of women's  
7 rights you actually have to be a supporter of  
8 women's rights. Like actually do things. And,  
9 in particular, not do things that go against  
10 women's rights like filing some garbage like  
11 this. What the fuck?

12 Again, you can't have your cake and eat it  
13 too. If you want to take cases where you're  
14 going after a domestic violence survivor in a  
15 completely frivolous bullshit lawsuit, you  
16 cannot also claim to support women's rights.  
17 You just can't. I mean, you can do whatever you  
18 want, but the math just doesn't add up. And I'm  
19 going to call you out. So, Nisha Bacchus,  
20 you're a backstabbing traitor. I almost feel  
21 bad for you, almost. Almost. Because he's  
22 playing her. He is playing her like a fucking  
23 fiddle. He knew he was going to have a hard  
24 time finding any attorney who was actually going  
25 to file this piece of garbage. He knew it. So

1 what did he do? He found someone desperate for  
2 work, someone so hard up for cases that she  
3 would do anything for a quick buck. And this  
4 much is obvious to me. It's really clear from  
5 her website.

6 For one thing, she uses "our firm", "our"  
7 this, "our" that, all throughout the website.  
8 And you can -- I mean, it's just one lawyer  
9 since, what I can tell, 2011. So it is seven  
10 years and you haven't been able to -- you have  
11 been using a plural pronoun but haven't been  
12 able to bring another lawyer on board. Like,  
13 "our". Okay. You and your paralegal. Um, so  
14 it is obvious from her website.

15 She also claims to have multiple  
16 departments of her law firm and she's the  
17 self-designated head of all these departments.  
18 I guess the competition wasn't really steep.  
19 Um, but, congrats.

20 Also, she's a door lawyer, which is  
21 basically a lawyer who takes anything that walks  
22 in the door in any area of law. So she  
23 basically claims to practice all these different  
24 areas: Civil, family, personal injury,  
25 criminal. And that's just about literally

1 almost every area of law except, I think, for,  
2 like, maybe immigration. I mean, that's most  
3 areas of law.

4 Here's the thing. There is a reason that  
5 general law practices are just not a thing  
6 anymore. Because you can't do every area of law  
7 and do them all well. You just can't. Some  
8 people try and they end up like Nisha Bacchus  
9 who are so hard up that they'll take anything,  
10 including shit like this. So I almost feel bad  
11 for her because he's playing her. It is really  
12 obvious from the way that she presents herself  
13 that she'll take anything if the price is right.  
14 Or even if it's not. I mean, I don't know.  
15 Maybe she is a little bit selective, you have to  
16 pay her a little bit more to do -- the higher  
17 the level of bullshit of the case, maybe the  
18 higher the fee, I don't know.

19 But he's clearly playing her. He's clearly  
20 manipulating her -- using her to his advantage.  
21 He knows this is a case that can't be won. He's  
22 clearly just willing to spend his time and money  
23 to continue to harass me because here's actually  
24 what happened. I dismissed voluntarily my  
25 injunction case last week, and Russell J.

1 Williams was insistent that the case continue to  
2 further hearing. Which is, like, pretty much  
3 against his client's best interest. Like, it's  
4 in his client's best interest to have the case  
5 just done. But Russell J. Williams is insisting  
6 on further hearings and sanctions and blah,  
7 blah, blah. And the Judge was just kind of  
8 like, yeah, no, I'm not doing all that. And, so  
9 that pissed him off. That made him real angry  
10 that he asked for something and the girl got her  
11 way. These sexist egomaniacs, that makes them  
12 really upset. So what does he do two days  
13 later? Files this. So he clearly has some  
14 problems.

15 So he's clearly manipulating her, clearly  
16 just using her, and she fell for it. So I  
17 almost feel bad for her but not quite. At the  
18 end of the day no matter how convincing and  
19 manipulative he is, it is still her choice to  
20 represent him and it's a choice that she'll live  
21 with for the rest of her life. Um, the choice  
22 to file this utter bullshit complaint. The  
23 choice to go after a rape survivor when you  
24 claim to be pro women's rights. Are you fucking  
25 kidding me? The choice to sell out to make a

1 quick buck. It's her choice. Her actions have  
2 spoken volumes about the kind of person she  
3 really is. And that is a woman who does not  
4 like women very much. So, sorry, honey, you're  
5 exposed.

6 And the really sad part of this is how  
7 she -- she treats women like this but then she  
8 also preys on them as clients. She has this  
9 whole section of her website which she calls the  
10 Florida Women's Law Center. Like some sort of  
11 charitable cause or some bullshit. And she  
12 lists, again, all these areas of law that she  
13 claims to help women in, basically everything  
14 under the sun. But she claims to do it from a  
15 pro women's standpoint, which is just garbage.

16 To claim to support women's rights while  
17 you take on a case like this, you're a fucking  
18 hypocrite. Look at your life. Look at your  
19 choices. Are you kidding me?

20 Again, you want to be a dick, that's fine,  
21 but own it. Don't dress up your Goddamn website  
22 like you're supporting the cause, because,  
23 girlfriend, you are not supporting the cause,  
24 you are part of the problem. You are a big part  
25 of the problem. Probably the biggest part of

1 the problem are the women who hold our movement  
2 back. How dare you claim to be a part of our  
3 movement, how fucking dare you, and then do  
4 this.

5 Everyone has a price and Russell J.  
6 Williams figured out Nisha's. But, girl, it's  
7 going to cost you. It's going to cost you,  
8 girl. You made your bed, so lay in it. Hope  
9 you're comfortable.

10 So the empowerment lesson for today is,  
11 stand up for what you believe in, no matter what  
12 it costs. Even if it costs you big, even if it  
13 costs you friendships, even if it costs you  
14 rape, stand for what you believe in and stand up  
15 tall and stand up strong, stand up tall, stand  
16 up strong and don't waiver, don't sell out. I'm  
17 telling you, I'm an entrepreneur, I'm a solo  
18 practitioner, so I get it. I know how hard it  
19 is to say no to business when you really need  
20 the income. But at what cost? Really? Really?  
21 At what cost?

22 I had a guy call me the other day whining  
23 about that he got fired. Of course it is always  
24 the males that are whining. Whining that he got  
25 fired for making gay slurs at work. Um, he

1 wanted me to help him get his job back. You  
2 know what I told him without skipping a beat:  
3 Sorry, I don't do that kind of work. Good-bye.  
4 I don't know if he even looked at my website, I  
5 mean, before he called me, so I don't know what  
6 he could have been thinking. He might have just  
7 been going down a list. But, yeah, without  
8 skipping a beat. Could I have made maybe a few  
9 grand off this guy? Sure probably. Would I  
10 have ever felt good about it in any way? Nope.  
11 Nope.

12 See, stand up for what you believe in in  
13 every context of your life, otherwise it is only  
14 a matter of time before you get called out. And  
15 your name is your brand. That is branding. And  
16 social media is powerful. So you get to choose  
17 your branding. And your choice of branding is  
18 representing misogynist pigs, misogynist bullies  
19 like Russell J. Williams, that's not good  
20 branding. It's your branding, but it's not good  
21 and it is going to follow you forever. So be  
22 careful and be thoughtful about your choices.  
23 All right?

24 Um, all right, everyone. Hope you enjoyed  
25 today's video. Have a great weekend, and I will

1 talk to you soon. Bye

2

3 [End of recording.]

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CERTIFICATE OF REPORTER

STATE OF FLORIDA

COUNTY OF PINELLAS

I, Gerrilynn Mehl, certify that I was  
authorized to and did stenographically report the  
YouTube video of Ashley Krapacs; and that the  
transcript is a true record of my transcription.

I further certify that I am not a relative,  
employee of any of the parties', attorneys, or  
counsel connected with the action, nor am I  
financially interested in the action.

Dated this 14th of August, 2018.



GERRILYNN MEHL

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**Youtube** 3:1

The Florida Bar's  
Exhibit N



## Timeline Review



## Timeline Review

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**Ashley Krapacs**6 mins · 

0 0 0

Nisha Elizabeth Bacchus. Damn, girl. You must be hard up for new cases to take on a piece of garbage like Russell J. Williams. And you promote yourself as being "pro-women's rights." How do you sleep at night? #sellout #womanhater #metoo #timesup #endrapeculture #endsexism #endmisogyny



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Attorney for Women's Legal Issues in Ft.  
Lauderdale, FL



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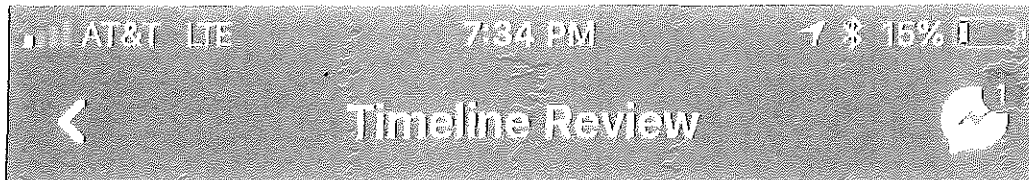
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**Ashley Ann Krapacs, PLLC**

...

1 min •

Ya'll, social media is no joke. You want to act a fool and be a jerk to people? Go right ahead. But don't expect people not to call you out for it. I'm talking to you, **Nisha Elizabeth Bacchus**. The choices you make in life form what becomes your personal brand. What do your choices say about you? **#beempowered #metoo #timesup #womensrights #humanrights #domesticviolence #calledout #exposed #notafraid #sellout #traitor #endsexism #endmisogyny**



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### Stand Up for What you Believe In - Be Empowered Vlog 16

Ashley discusses the importance of standing up for what you believe in. You...



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The Florida Bar's  
Exhibit P



Instagram



No,  
I do not  
yield.

Ashley Ann Krapacs, Esq. @Nol... · 42s ✓

When you get sued for #defamation for speaking publicly about being a #domesticviolence survivor, and you discover the attorney who filed the case is a WOMAN (Nisha Bacchus) who claims to be a #womensrights supporter. #wow #nope #areyouforreal #traitor #womanhater #metoo #TimesUp



No,  
I do not  
yield.

Ashley Ann Krapacs, Esq. @Nol... · 5h ✓

Russell J. Williams, partner at @WUWG LAW, sued me for #defamation. Way to harass a survivor of #domesticviolence and #rape, you pig! Oh, and #TRUTH is an absolute defense to defamation, moron, so good luck with that. Smfh. #metoo #timesup #frivolous #vindictive #bully



noidonotyield Exposing @bacchus\_law for the woman she REALLY is. #traitor #sellout #womanhater



The Florida Bar's  
Exhibit Q



## Ashley Ann Krapacs, PLLC

### Be Empowered Blog

#### Female Attorney Nisha Bacchus Files Frivolous Lawsuit Against Domestic Violence Survivor

August 8, 2018 | Ashley Krapacs



There's a special place in hell for women who attack rape and domestic violence survivors. Attorney Nisha Bacchus recently locked in her spot.

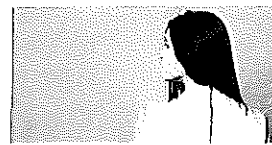
She filed a completely frivolous lawsuit against a domestic violence survivor, a woman who has been put through hell and harassed and tormented by a whole army of attorneys for nearly eight months now. I'd know, because that woman is me.

If you follow my work, you've likely heard me talk about my story, or at least bits and pieces of it. After confronting a former boyfriend about raping me, he waged a full-on war against me. He even got a number of attorneys to join in on the fight. He's a very wealthy and vindictive man, and I've learned the hard way that everyone can be bought, you just have to figure out their price. And Gregory Knoop could afford the prices of a whole lot of questionable attorneys: Russell J. Williams, Esquire of Williams Hilal Wigand Grande Law Firm; James Drakeley and M. Kenneth Patterson of Hiersche Hayward Drakeley Urbach; David Benowitz of Price Benowitz; and Kevin Tynan of Richardson & Tynan PLLC.

Until recently, though, they were all males. So I'm admittedly disheartened to learn that a female has joined that fight. But again, everyone can be bought. And Russell J. Williams of Williams Hilal Wigand Grande Law Firm paid her price.

The backstory is this: upon the advice of several attorneys and domestic violence organizations, I filed for an Injunction of Protection Against Domestic Violence against my former boyfriend, Gregory

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Knoop, back in January. Gregory Knoop hired Russell J. Williams to represent him in the injunction case. After a particularly appalling hearing in April (in which my motions were ignored, I was prevented from speaking, and the judge interrupted me a minimum of eleven times in thirty minutes), I wrote an article expressing my shock and indignation at how biased the proceeding was against me. In particular, I pointed out that Mr. Russell J. Williams had lied repeatedly when the judge asked him if he had received my Motion to Amend the Petition. When I tried to speak up and say that I had proof Mr. Williams received the motion, the judge kept shushing me and giving Mr. Williams more and more opportunities to correct his statement. And Mr. Williams kept lying. He kept digging himself down further. At one point, he even concocted this whole story about the clerk's office to try to defend his lie. But then, realizing I was going to call him out regardless and that he was stuck, he finally corrected, on about the fifth opportunity that the judge gave him. This is documented clearly in the official court record.

I wrote an article about the incident. The article truthfully described what had transpired at the hearing. And now Mr. Williams is crying foul. Because HE lied. On the record. Repeatedly. He's suing me for defamation (even though truthful statements cannot, by definition, be defamatory) when it's his own horrendous conduct that has painted him in a negative light.

You can't lie and cheat your way through cases and then demand confidentiality at the same time. It just doesn't work like that. You want to act like an ass? I will call you out publicly.

The defamation suit is intended only to harass and intimidate me. Mr. Williams knows it. And so does Nisha Bacchus. But she sold out anyway. She's helping a hateful bully continue to torment me. She's helping a sexist pig continue to psychologically torture me. It's gotta be a painful existence to live as a woman and also hate women so much at the very same time.

The website of Nisha Bacchus tells me everything I need to know about this woman: she's thirsty for work. So hard up, she'll engage with a scumbag like Russell J. Williams. It's pathetic, really. She uses plural pronouns like "we" and "our" throughout the site, but it's just her. Well, her and one paralegal. News flash: one attorney means you operate a solo practice. Which is quite different from a multi-lawyer law firm. Don't get me wrong. There's nothing wrong with being a solo. I'm a solo. I like working by myself, and I wouldn't have it any other way. But I own it. I don't put myself out as being something I'm not. I don't have to deceive my clients to get their business. Apparently, Ms. Bacchus does.

She also states that she "heads the Family Law, Personal Injury & Corporate Law Divisions." It is laughable to think a solo practitioner would have a need for different "divisions," since it's just her, but I guess having that verbiage on her homepage makes her feel special. She also refers to her paralegal as the "managing paralegal." Who or what she manages is a mystery. These statements are just more deceptive swill intended to trick clients into believing that Ms. Bacchus's firm is something that it's not.

But here's the most disturbing part of Ms. Bacchus's website: the "Florida Women's Law Center" section. Click on that link, and the whole website turns pink, and she claims to be a supporter of women's rights. She throws around a lot of statistics but cites no sources. And she even claims to help women who are victims of abuse.



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May 10, 2018



*When You Don't Let Female Lawyers Talk, We'll Only Get Louder*  
April 23, 2018



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*When it Comes to Sexual Harassment, We've Still got a Long Way to Go, Baby*  
April 9, 2018

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women's rights

Are you fucking kidding me?

What a fraud. She pretends to care about women. She pretends to support women's rights issues. She pretends to care about women who have been abused.

And that's when I call BULLSHIT. Her actions speak much louder than the garbage on her website. Filing a frivolous defamation suit against a rape survivor who has been harassed and bullied for months, just so she can make a few bucks, is certainly NOT helping women's rights. It's only helping to perpetuate the serious challenges that women face, helping to perpetuate rape culture and the abuse and torment of innocent women.

In a lot of ways, Nisha Bacchus is just like Russell J. Williams: a bully who wants to act like an asshole, but then pretend like she's something she's not, and just try to avoid she getting called out for who she really is. Well, sorry, sweetie, but you can't have it both ways. If you want to take clients like Russell J. Williams, you can't also claim to support women's rights and the #metoo movement. That math just doesn't add up. And I will call you out and scream it from the rooftops: Nisha Bacchus is nothing more than an insecure, hateful, jealous woman who hates women.

See you in court, asshole.

Tags: women's rights bullying

Contact	Email	Location	Follow
754-260-9761	ashley@krapacslaw.com	401 E. Las Olas Blvd Suite 1400 Fort Lauderdale, FL 33301	



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The Florida Bar's  
Exhibit R

Profile

News Feed

Messenger

Groups

TV Crime Watch

📺 Historical and Me...

🌴 Clean-Miami Lakes Tre...

🍻 Foster fest

🌊 Oceanfront Beginn...

👉 Now More...

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🔍 Ashley Krapacs

👤 16

2 Comments

👍 Like

💬 Comment

➦ Share



Ashley Krapacs

October 22 · 🌐

👤 ...

Case Update: my rockstar attorney was able to get the defamation case unsealed, so it's now properly appearing in the public record. If you go to [www.worldwideantidark.org](http://www.worldwideantidark.org) and conduct a "Case Search" for my name, you'll see the case there. And you can read in my Motion for Summary Judgment why Russell J. Williams of Williams, Hilal, Wigand & Grande, PLLC. law firm was so butt hurt and angry and determined to have the case sealed. But it doesn't work like that. As I've said from the start, you can't sue someone in civil court and then expect confidentiality. Anyone who's being sued is entitled and expected to launch a full, thorough defense against the plaintiff. If you can't stand the heat, get out of the kitchen.

When I was interviewing attorneys, every single one that I spoke with said to me, point blank, "Cases don't just disappear like that. There's no way that happened." Well, it did! Law Office of Nisha E. Bacchus, P.A. was able to have the case ILLEGALLY sealed for weeks. And to top it up, I just found out that while the case was sealed (and while I was effectively boxed out of access and participation in the case), she filed several things and provided me with absolutely no notice, even though I'm listed in the court's e-service system. No idea where this lunatic went to law school, but it must have been a school that doesn't put a whole lot of emphasis on, ya know, THE LAW, and just basic due process. Smfh. #metoo #timesup #bullies #amateurhour #womensrights #equalrights #endviolenceagainstwomen #endrapeculture #endthepatriarchy

👤 31

9 Comments

👍 Like

💬 Comment

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The Florida Bar's  
Exhibit S



Ashley Krapacs



Like



Comment



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RECENT CHECK



Ashley Krapacs

October 25 · 🌐



Ya'll, I just can't with this diva. SIMPLY CANNOT! Nisha Bacchus clearly isn't a fan of my social media. How do I know? For one thing, she must have spent all day on the phone with Facebook, because I'm not able to tag her or her law firm anymore. So much for the First Amendment!

On top of that, today, she tells my attorney that she's going to sue me (more) for my recent posts about her. Apparently, she's gone through all the contents of her Bag of Tricks to Mindfuck Sexual Assault Survivors, and now she has to keep reusing the contents. She's already tried using her personal connections at the Florida Bar to silence me. Didn't work. She tried using her connections at the court to silence me. Didn't work. She and her client, Russell J. Williams of Williams, Hilal, Wigand & Grande, PLLC, law firm, even threatened to use personal connections at the states attorney office to have me arrested. Even then, I refused to be silenced. This lady is OUT OF CONTROL. Nothing but an evil bully. Bring it, diva. NOTHING they can do to me is going to silence me from speaking the truth about what people like Nisha Bacchus and Russell J. Williams do to vulnerable #sexualassaultsurvivors. #metoo #timesup #womensrights #believesurvivors #humanrights #enoughisenough



13

2 Comments



Like



Comment



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Exhibit T

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Outcuts

PSN Crime Watch

MFO Historical and Me...

Hialeah-Miami Lakes Tre...

Lobster fest

Free Oceanfront Beginn...

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Town Hall

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Ashley Krapacs

Oct 26, 2018

I heard from the Florida bar today regarding the multiple ethics complaints that have been filed against me by Russell J. Williams (partner at Williams, Hibel, Wigand & Grande, PLLC Law firm) and my ex, Gregory Knoop. Given the timing of the email and that I hadn't heard anything from them at all for weeks, I have to assume that it's not a coincidence. It is solely my opinion, but I have to believe Nisha is behind it. Anyway, they updated to let me know I'm still being investigated. Russell J. Williams lies repeatedly in open court to a judge, he abuses the procedures of the law and uses them to harass and intimidate me, and the Florida bar declines to discipline him in the least. That determination was made incredibly swiftly, within a number of weeks. I'm getting harassed and tormented by two members of their bar for months, and now I'm the one being investigated. The complaints against me have been pending since the spring. The double standard that is being applied to me is maddening. And then the fact that there's obviously a LOT going on behind the scenes that I'm not privy to is incredibly upsetting. This is ya world we live in. It's 2018, and young female attorneys are held to an entirely different standard than the Old White Males. It may cost me my bar license to keep writing publicly about the state of this field, but I don't feel I have any other choice. Sitting down and shutting up and staying silent about how #sexualassaultsurvivors are treated by this profession is just not something I'm able to do. Coincidentally, today is the 3 year anniversary of the day I found out I passed the bar and would become a lawyer. I'm saddened to think that might not be the case for much longer, but I can't stay in a profession that tolerates this sort of treatment of women. #metoo #timesup #believesurvivors #womensrights #humanrights #enddomesticviolence #endsexualassault #endviolenceagainstwomen



Ashley Krapacs

Oct 26, 2018

I heard from the Florida bar today regarding the multiple ethics complaints that have been filed against me by Russell J. Williams (partner at Williams, Hibel, Wigand & Grande, PLLC Law firm) and my ex, Gregory Knoop. Given the timing of the email and that I hadn't heard anything from them at all for weeks, I have to assume that it's not a coincidence. It is solely my opinion, but I have to believe Nisha is behind it. Anyway, they updated to let me know I'm still being investigated. Russell J. Williams lies repeatedly in open court to a judge, he abuses the procedures of the law and uses them to harass and intimidate me, and the Florida bar declines to discipline him in the least. That determination was made incredibly swiftly, within a number of weeks. I'm getting harassed and tormented by two members of their bar for months, and now I'm the one being investigated. The complaints against me have been pending since the spring. The double standard that is being applied to me is maddening. And the fact that there's obviously a LOT going on behind the scenes that I'm not privy to is incredibly upsetting. This is ya world we live in. It's 2018, and young female attorneys are held to an entirely different standard than the Old White Males. It may cost me my bar license to keep writing publicly about the state of this field, but I don't feel I have any other choice. Sitting down and shutting up and staying silent about how

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News Feed

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Tobacco Fest

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Ashley Krapacs

#gooddeeds #beahelper

47

/ Comments

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Comment

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Ashley Krapacs shared Ashley Ann Krapacs, PLLC's post.

November 29 · 🌐

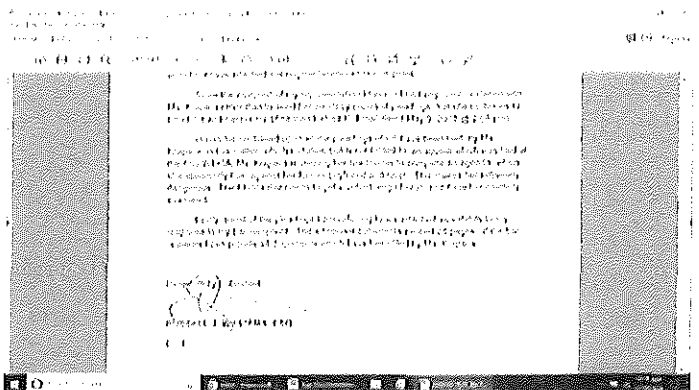
So this bully (and his attorney Law Office of Nisha E. Bacchus, P.A.) informed my attorney that they'll withdraw their bullshit lawsuit if I stop posting about them and if I remove all my previous posts. Last time I did that, though, they not only didn't follow through with their promise to withdraw the suit, they increased their threats and attacks against me tenfold, including a very scary threat to have me arrested even though I've done nothing illegal. In the meantime, as they've exhausted their entire bag of tricks, I've only gotten stronger and more resilient. So, sorry I'm not sorry, but my silence isn't up for sale, and it's certainly not free. As long as the litigation continues, I look forward to embarrassing both of these bullies as I lay the paper trail that clearly demonstrates what side of history these two attorneys are on. And hint: it's not the good side! #w...



Ashley Ann Krapacs, PLLC

November 29 · 🌐

#tbt to the time that Russell J. Williams of Williams, Hiral, Wigand & Grande, PLLC, law firm wrote to the Florida Bar about me and demanded that they "reign her in, and have her me..." Continue Reading



15

11 Comments

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Ashley Krapacs shared AttorneyProblems's post.

November 25 · 🌐

Put your hand on your heart, swear. Backlash for being told "Go home, Lawyer."

The Florida Bar's  
Exhibit V

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Ashley Krapacs

December 14, 2018

At some point in all this drama, when I was stressing about the Florida Bar complaints, @mhn5663 reminded me that despite the attacks I've suffered from bullies like Nisha Bacchus and Russell J. Williams, one of the things they can never take is my J.D. So when I was going through my storage unit the other day and saw these bad boys, I brought them with me to what is now my third home in two months. The last several weeks, it's been easier than ever to keep fighting this battle, and this week, I got some unsavory information about Nisha Bacchus that is a total game changer. Stay tuned for that. But just another reminder that as long as you stay strong and stay the course, the tide will eventually turn. [@cumlaude](#) [#gratitude](#) [#womensrights](#) [#equalrights](#) [#humanrights](#) [#endsexism](#) [#endviolenceagainstwomen](#) [#domesticviolence](#) [#believe survivors](#) [#staystrong](#) [#justkeepgoing](#)



Ashley Krapacs

December 14, 2018

At some point in all this drama, when I was stressing about the Florida Bar complaints, Mariah reminded me that despite the attacks I've suffered from bullies like Nisha Bacchus and Russell J. Williams, one of the things they can never take is my J.D. So when I was going through my storage unit the other day and saw these bad boys, I brought them with me to what is now my third home in two months. The last several weeks, it's been easier than ever to keep fighting this battle, and this week, I got some unsavory information about Nisha Bacchus that is a total game changer. Stay tuned for that. But just another reminder that as long as you stay strong and stay the course, the tide will eventually turn. [@cumlaude](#) [#gratitude](#) [#womensrights](#) [#equalrights](#) [#humanrights](#) [#endsexism](#) [#endviolenceagainstwomen](#) [#domesticviolence](#) [#believe survivors](#) [#staystrong](#) [#justkeepgoing](#)

this is visible to anyone who can see this post.

The Florida Bar's  
Exhibit W

IN THE CIRCUIT COURT OF THE 17<sup>th</sup> JUDICIAL CIRCUIT,  
IN AND FOR BROWARD COUNTY, FLORIDA

Case No.: DVCE-19-000341  
Division: 63 - STEFANIE C. MOON

Nisha E Bacchus  
Petitioner

and

Ashley Ann Krapacs  
Respondent

**FINAL JUDGMENT OF INJUNCTION FOR PROTECTION AGAINST  
STALKING (AFTER NOTICE)**

The Petition for Injunction for Protection Against Stalking under Section 784.0485, Florida Statutes, and other papers filed in this Court have been reviewed. The Court has jurisdiction of the parties and the subject matter. The term Petitioner as used in this injunction includes the person on whose behalf this injunction is entered.

It is intended that this protection order meet the requirements of 18 U.S.C. Section 2265 and therefore intended that it be accorded full faith and credit by the court of another state or Indian tribe and enforced as if it were the order of the enforcing state or of the Indian tribe.

**SECTION I. HEARING**

This cause came before the Court for a hearing to determine whether an Injunction for Protection Against Stalking in this case should be:

☒ issued ☐ modified ☐ extended.

The hearing was attended by:

- ☒ Petitioner
- ☒ Petitioner's Counsel
- ☒ Respondent
- ☒ Respondent's Counsel

**SECTION II. FINDINGS**

On {date}January 23, 2019, a notice of this hearing was served on Respondent together with a copy of Petitioner's petition to this Court and the temporary injunction, if issued. Service was within the time required by Florida law, and Respondent was afforded an opportunity to be heard.

After hearing the testimony of each party present and of any witnesses, or upon consent of Respondent, the Court finds, based on the specific facts of this case, that Petitioner is a victim of stalking.

Florida Supreme Court Approved Family Law Form 12.980(v), Final Judgment of Injunction for Protection Against Stalking (After Notice) (03/15)

### SECTION III. INJUNCTION AND TERMS

This injunction shall be in full force and effect until either ☒ further order of the Court or ☐ until {date} \_\_\_\_\_. This injunction is valid and enforceable throughout all counties in the State of Florida. The terms of this injunction may not be changed by either party alone or by both parties together. Only the Court may modify the terms of this injunction. Either party may ask the Court to change or end this injunction.

Willful violation of the terms of this injunction, such as: committing an act of stalking against Petitioner; going to or being within 500 feet of Petitioner's residence, place of employment, school, or other place prohibited in this injunction; knowingly and intentionally coming within 100 feet of Petitioner's motor vehicle, whether or not that vehicle is occupied; committing any other violation of this injunction through an intentional unlawful threat, word or act to do violence to Petitioner; telephoning, contacting or communicating with Petitioner, unless indirect contact through a third party is specifically allowed by this injunction; defacing or destroying Petitioner's personal property, including Petitioner's motor vehicle; having care, custody, use or possession of a firearm or ammunition unless authorized by section 790.233(3), Florida Statutes, constitutes a misdemeanor of the first degree punishable as provided by Sections 775.082 and 775.083, Florida Statutes.

Any party violating this injunction shall be subject to civil or indirect criminal contempt proceedings, including the imposition of a fine or imprisonment, and also may be charged with a crime punishable by a fine, jail, or both, as provided by Florida Statutes.

#### **ORDERED and ADJUDGED:**

1. **Prohibited Actions.** Respondent shall not commit, or cause any other person to commit, any acts of stalking against Petitioner, including stalking, cyberstalking, aggravated stalking, or any criminal offense resulting in physical injury or death. Respondent shall not commit any other violation of the injunction through an intentional unlawful threat, word or act to do violence to Petitioner.

2. **No Contact.** Respondent shall have no contact with Petitioner unless otherwise provided in this section.

a. Unless otherwise provided herein, Respondent shall have no contact with Petitioner. Respondent shall not directly or indirectly contact Petitioner in person, by mail, e-mail, fax, telephone, through another person, or in any other manner, including any electronic means or use of social media. Further, Respondent shall not contact or have any third party contact anyone connected with Petitioner's employment or school to inquire about Petitioner or to send any messages to Petitioner.

Unless otherwise provided herein, **Respondent shall not go to, in, or within 500 feet of:**

b. Petitioner's current residence (list address) WHEREVER PETITIONER RESIDES IN FLORIDA of any residence to which Petitioner may move;

c. Petitioner's current or any subsequent place of employment (list address of current employment \_\_\_\_\_);

d. Petitioner's school (list address of school) \_\_\_\_\_; or

e. the following other place(s) regularly frequented by Petitioner and any named family members or individuals closely associated with Petitioner: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

f. Respondent shall not knowingly or intentionally come within 100 feet of Petitioner's motor vehicle, whether or not that vehicle is occupied;

g. Respondent shall not deface or destroy Petitioner's personal property, including Petitioner's motor vehicle

h. Other provisions regarding contact: The Respondent shall not deface or destroy Petitioner's personal property including but not limited to Petitioner's motor vehicle.

### 3. Firearms.

Unless paragraph a. is initialed below, Respondent shall not have in his or her care, custody, possession, or control any firearm or ammunition. It is a violation of section 790.233, Florida Statutes, and a first degree misdemeanor, for Respondent to have in his or her care, custody, possession or control any firearm or ammunition.

{Initial all that apply; write N/A if not applicable}

a. ☐ Respondent is a state or local officer, as defined in section 943.10(14), Florida Statutes, who holds an active certification, who receives or possesses a firearm or ammunition for use in performing official duties on behalf of the officer's employing agency, and is not prohibited by the court from having in his or her care, custody, possession or control any firearm or ammunition.

b. ☒ Respondent shall not use or possess a firearm or ammunition.

c. ☒ Respondent shall surrender any firearms and ammunition in the Respondent's possession to the Broward County Sheriff's Department. Failure to surrender either firearms or ammunition if ordered to do so by the court constitutes a misdemeanor of the first degree, punishable as provided in section 775.082 or 775.083, Florida Statutes.

d. ☒ Other directives relating to firearms and ammunition: Respondent shall surrender any concealed weapon permits or gun licenses to law enforcement.

**4. Treatment, Intervention, or Counseling.**

{Initial if applicable; write N/A if not applicable}

a. Respondent shall participate in the treatment, intervention, or counseling specified below. Respondent shall pay for all services rendered: \_\_\_\_\_

b. ~~Within \_\_\_\_\_ days of the date of this Injunction, Respondent shall enroll in, and thereafter complete without delay, the treatment, intervention, or counseling required in paragraph a. above. Respondent shall provide proof of such enrollment to the Clerk of the Court.~~

5. **Mailing Address or Designated E-Mail Address(es).** Respondent shall notify the Clerk of the Court of any change in either his or her mailing address, or designated e-mail address(es), within 10 days of the change. All further papers (excluding pleadings requiring personal service) shall be served either by mail to Respondent's last known mailing address or by e-mail to Respondent's designated e-mail address(es). Service shall be complete upon mailing or e-mailing.

**6. Additional provisions(s) necessary to protect Petitioner from stalking:**

RESPONDENT IS PROHIBITED FROM POSTING NISHA BACCHUS, NISHA ELIZABETH BACCHUS OR ANY PART THEREOF, ON ANY SOCIAL MEDIA OR INTERNET WEBSITES. THE RESPONDENT SHALL TAKE DOWN ALL SOCIAL MEDIA AND INTERNET POSTS THAT REFERENCE NISHA BACCHUS, NISHA ELIZABETH BACCHUS, OR ANY PART THEREOF IMMEDIATELY. THE RESPONDENT MUST FILE WITH THE COURT, AN AFFIDAVIT OF COMPLIANCE BY FEBRUARY 26, 2019 THAT SHE HAS COMPLIED WITH THE COURT'S ORDER OF REMOVING THE SOCIAL MEDIA AND INTERNET POSTS. IF SHE COMPLIES, HER APPEARANCE WILL BE WAIVED AT THE FEBRUARY 28, 2019 COMPLIANCE HEARING. THE RESPONDENT SHALL ALSO NOTIFY THE PETITIONER'S ATTORNEY, JOSEPH ANDREW DIRUZZO III, BY E-MAIL UPON REQUEST FOR USE OF THE COMMON AREA CONFERENCE ROOM OF THE SHARED OFFICE SPACE.

7. **Referral to Appropriate Services for Petitioner.** Petitioner may contact the following services as needed:

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**SECTION IV. OTHER SPECIAL PROVISIONS**

{This section to be used for inclusion of local provisions approved by the chief judge as provided in Florida Family Law Rule 12.610.}

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**SECTION V. DIRECTIONS TO LAW ENFORCEMENT OFFICER IN ENFORCING THIS INJUNCTION**

**{Unless ordered otherwise by the judge, all provisions in this injunction are considered mandatory provisions and should be interpreted as part of this injunction.}**

1. **This injunction is valid and enforceable in all counties of the State of Florida.** Violation of this injunction should be reported to the appropriate law enforcement agency. Law enforcement officers of the jurisdiction in which a violation of this injunction occurs shall enforce the provisions of this injunction and are authorized to arrest without a warrant pursuant to Section 901.15, Florida Statutes, for any violation of its provisions, which constitutes a criminal act under Section 784.0485, Florida Statutes.

2. **THIS INJUNCTION IS ENFORCEABLE IN ALL COUNTIES OF FLORIDA AND LAW ENFORCEMENT OFFICERS MAY EFFECT ARRESTS PURSUANT TO SECTION 901.15(6), FLORIDA STATUTES.** The arresting agent shall notify the State Attorney's Office immediately after arrest.

3. **Reporting alleged violations.** If Respondent violates the terms of this injunction and has not been arrested, Petitioner may contact the clerk of the circuit court of the county in which the violation is alleged to have occurred. The clerk shall assist Petitioner in preparing an affidavit in support of reporting the violation or direct Petitioner to the office operated by the court that has been designated by the chief judge of that circuit as the central intake point for violations of injunctions for protection where Petitioner can receive assistance in the preparation of the affidavit in support of the violation. The affidavit shall be immediately forwarded by the office assisting Petitioner to the state attorney of that circuit and to the judge designated by the chief judge as the recipient of affidavits of violations of an injunction. Procedures relating to reporting alleged violations are governed by section 784.0487, Florida Statutes.

4. Respondent, upon service of this injunction, shall be deemed to have knowledge of and to be bound by all matters occurring at the hearing and on the face of this injunction.

5. The temporary injunction, if any, entered in this case is extended until such time as service of this injunction is effected upon Respondent.

DONE AND ORDERED in Fort Lauderdale, Broward County, Florida, on 2/1/2019.

**JUDGE STEFANIE C. MOON**

**FEB - 1 2019**

**TRUE COPY**

\_\_\_\_\_  
CIRCUIT JUDGE STEFANIE C. MOON

COPIES TO:

Sheriff of Broward County

**Petitioner (or his or her attorney):**

☐ by U. S. Mail

☒ by hand delivery in open court (Petitioner must acknowledge receipt in writing on the face of the original order--see below.)

☐ by e-mail to designated e-mail address(es)

**Respondent (or his or her attorney):**

☐ forwarded to sheriff for service

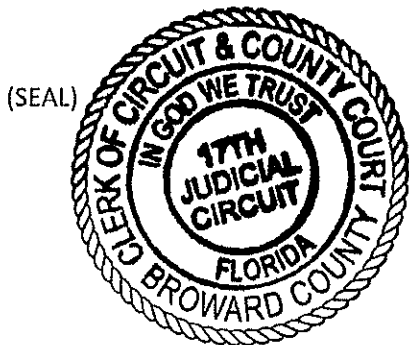
☒ by hand delivery in open court (Respondent must acknowledge receipt in writing on the face of the original order--see below.)

☐ by certified mail (may only be used when Respondent is present at the hearing and Respondent fails or refuses to acknowledge the receipt of a certified copy of this injunction.)

☐ State Attorney's Office

☐ Other \_\_\_\_\_

I CERTIFY the foregoing is a true copy of the original **Final Judgment of Injunction for Protection Against Stalking** as it appears on file in the office of the Clerk of the Circuit Court of Broward County, Florida, and that I have furnished copies of this order as indicated above.



CLERK OF THE CIRCUIT COURT

By: \_\_\_\_\_

Deputy Clerk or Judicial Assistant

Y. HANKERSON  
A TRUE COPY  
CIRCUIT/COUNTY  
COURT SEAL

**ACKNOWLEDGMENT**

I, {Name of Petitioner} NISHA E BACCHUS, acknowledge receipt of a certified copy of this Final Judgment of Injunction for Protection Against Stalking.

\_\_\_\_\_  
Petitioner

**ACKNOWLEDGMENT**

I, {Name of Respondent} ASHLEY ANN KRAPACS, acknowledge receipt of a certified copy of this Final Judgment of Injunction for Protection Against Stalking.

\_\_\_\_\_  
Respondent