



STATE BAR OF GEORGIA  
GRIEVANCE  
CONFIDENTIAL

IN RE:           **Mr. L. Lin Wood, Jr.**  
Address:       663 Greenview Avenue NE, Atlanta, GA 30305  
Bar Number: 774588

The State Disciplinary Board of the State Bar of Georgia has received information concerning the above-named attorney that suggests that said attorney may have violated one or more of the Georgia Rules of Professional Conduct. After having considered the matter, the Board, pursuant to Rule 4-203(2), does hereby on its own motion initiate this Grievance as follows:

The attached information indicates Mr. Wood may have engaged in conduct in violation of Georgia Rules of Professional Conduct 1.1, 1.2, 3.1, 3.3, 4.1 and 4.4, and Bar Rule 4-104.

This 5<sup>th</sup> day of February, 2021.

STATE DISCIPLINARY BOARD

**King et al. v. Whitmer et al., U.S. District Court Eastern District of Michigan, Case No. 2:20-cv-13134** (Lin Wood – Counsel for plaintiffs)

On November 25, 2020, Wood, along with others, filed a challenge to the 2020 General Election in the U.S. District Court, Eastern District of Michigan, Southern Division. The Complaint alleged the following:

massive election fraud, multiple violations of the Michigan Election Code, see, e.g., MCL §§ 168.730-738, in addition to the Election and Electors Clauses and Equal Protection Clause of the U.S. Constitution violations that occurred during the 2020 General Election throughout the State of Michigan, as set forth in the affidavits of dozens of eye witnesses and the statistical anomalies and mathematical impossibilities detailed in the affidavits of expert witnesses. (Complaint, Exhibit A).

On November 29, 2020, the plaintiffs filed an amended complaint. (Amended Complaint, Exhibit B) In the Amended Complaint, plaintiffs described one their experts as “a former U.S. Military Intelligence expert.” (Exhibit B ¶ 161). In fact, plaintiffs’ expert never completed the training program and was not an intelligence analyst.

The same day plaintiffs filed an emergency motion for relief seeking “de-certification of Michigan’s election results or a stay in the delivery of the certified results to the Electoral College to preserve the status quo while this case proceeds, as well as seeking the impounding of the voting machines made available and other equitable relief, on an emergency basis, due to the irreparable harm, and impending election voting for the electors, as stated in the Complaint.” (Emergency Motion, Exhibit C).

On December 7, 2020, the court entered an order denying plaintiffs’ emergency motion. (Order, Exhibit D). In the order, the court determined:

- Plaintiffs’ state law claims against the defendants were barred by 11<sup>th</sup> Amendment immunity.
- The matter was moot because the time had passed to provide most of the relief plaintiffs requested in their amended complaint and plaintiffs did not avail themselves of established remedies.
- Plaintiffs did not exercise diligence in asserting their claims.
- Plaintiffs lacked standing.

Subsequently the City of Detroit and other interested parties filed several motions seeking sanctions, including a Motion for Sanctions, for Disciplinary Action, for Disbarment Referral and for Referral to State Bar Disciplinary Bodies. (Motion for Sanctions, Exhibit E).

On January 14, 2021, the plaintiffs’ voluntarily dismissed their complaint without prejudice.

On January 19, 2021, plaintiffs filed a response to the City’s motion for sanctions and disciplinary action. (Plaintiff’s Opposition to Motion for Sanctions, Exhibit F). In the motion, plaintiffs stated that plaintiffs had submitted “evidence for nearly every paragraph in the

Amended Complaint...” Plaintiffs also asked the court to deny the motion because only plaintiffs’ local counsel had signed pleadings and argued that when the attorney’s name only appears in typewritten form, sanctions cannot be imposed.

On January 26, 2021, the City of Detroit filed a reply brief in support of its motion for sanctions. (Reply Brief in Support of Motion for Sanctions, Exhibit G). In its reply brief, the City pointed out that plaintiffs made additional misrepresentations to the court in their response to the sanctions motion by falsely claiming that only Michigan attorneys signed the pleadings. (Exhibit G, pp. 3-4). The City also demonstrated that plaintiffs presented case law interpreting the 1983 version of Rule 11 and that in 1993, the Rule was “fundamentally altered in a manner that renders their cited case law wholly inapposite.” (Exhibit G, pp. 4-6).

**Pearson et al. v. Kemp et al., 1:20-cv-4809 U.S. District Court Northern District of GA**  
(Lin Wood - Counsel for plaintiffs)

On November 25, 2020, Lin Wood, along with others, filed a complaint for declaratory, emergency and permanent injunctive relief in the U.S. District Court for the Northern District of Georgia, Atlanta Division. (Complaint, Exhibit H).

On November 27, 2020, plaintiffs filed a motion for injunctive relief seeking (1) a temporary restraining order preventing the defendants from erasing or altering forensic data on voting machines, (2) an injunction de-certifying the Presidential election results, or alternatively a stay in the delivery of the certified results to the Electoral College, and (3) an injunction making the voting machines available to the plaintiffs for forensic analysis.

The district court held a hearing on the plaintiffs’ motion via Zoom on November 29, 2020. Plaintiffs proposed that the district court order “very limited” relief in “two or three counties.” Following the hearing, the court issued a written temporary restraining order on November 29, 2020, that gave the plaintiffs what they said they wanted. That order enjoined the defendants from erasing or altering data on voting machines in Cobb, Gwinnett and Cherokee counties. It also ordered the defendants to produce a copy of the contract between the State of Georgia and Dominion Voting Systems. Two follow-up orders set an expedited evidentiary hearing for the morning of December 4, 2020, on the broader relief requested in the plaintiffs’ motion and certified that the Sunday night order contained the elements required for a permissive appeal under 28 U.S.C. § 1292(b).

On December 1, 2020, the plaintiffs filed a notice of appeal as to the district court’s November 29, 2020 order. As a result, the district court canceled the hearing on the broader relief the plaintiffs had requested. The defendants filed a conditional cross-appeal. Later, the plaintiffs also requested permission to appeal to the 11<sup>th</sup> Circuit under 28 U.S.C. § 1292(b). Mr. Wood is listed as counsel of record for the plaintiffs in the 11<sup>th</sup> Circuit appeal.

On December 4, 2020, the U.S. Court of Appeals for the 11<sup>th</sup> Circuit issued an order dismissing the appeal for lack of jurisdiction and remanding the case to district court for further proceedings. (Order, Exhibit I). In its December 4 order, the appellate court determined that:

- The district court's order was not appealable under 28 U.S.C. §§ 1291, 1292(a)(1), or 1292(b).
- Even if the order was appealable, the appellate court does not ordinarily have jurisdiction over TRO rulings.
- The case did not meet the requirements for section 1292(b) interlocutory review.
- Because the plaintiffs appealed, the evidentiary hearing was stayed and "the case considerably delayed."
- The district court's order did not deny the plaintiffs the requested relief.

On December 11, 2020, plaintiffs filed an Emergency Petition Under Rule 20 for Extraordinary Writ of Mandamus with the U.S. Supreme Court seeking an emergency order (1) instructing Respondents to de-certify the results of the General Election for the Office of President, and prohibiting Respondents from empaneling the Biden slate of electors to cast their votes in the Electoral College, (2) prohibiting Respondents from including in any certified results from the General Election the tabulation of absentee and mailing ballots which do not comply with the Georgia Election Code, and (3) requesting that the Court direct the District Court to order production of all registration data, ballots, envelopes, etc. required to be maintained by Georgia state and federal law, to refrain from wiping or otherwise tampering with the data on all voting machines used in the November 2020 election, and to produce one such machine from each Georgia county for forensic examination by Petitioners' experts.

On January 19, 2021, the plaintiffs filed a stipulation of dismissal of that Emergency Petition.

**Feehan v. Wisc. Elections Comm'n, 20-cv-1771, U.S. District Court Eastern District of Wisconsin** (Lin Wood-counsel for plaintiffs)

On December 1, 2020, Lin Wood, along with other counsel, filed a complaint on behalf of William Feehan and Derrick Van Orden in the U.S. District Court for the Eastern District of Wisconsin. (Complaint, Exhibit J).

The complaint alleged "massive election fraud" and "multiple violations of the Wisconsin Election Code" during the 2020 General Election in the State of Wisconsin "as set forth in the affidavits of dozens of eyewitnesses and the statistical anomalies and mathematical impossibilities detailed in the affidavits of expert witnesses." (Exhibit J, p. 1).

The complaint identified Van Orden as a resident of Hager City, Wisconsin, and the 2020 Republican nominee for Wisconsin's Third Congressional District Seat for the U.S. House of Representatives. The complaint alleged that:

Mr. Van Orden ‘lost’ by approximately 10,000 votes to the Democrat incumbent,” and stated that “[b]ecause of the illegal voting irregularities as will be shown below, Mr. Van Orden seeks to have a new election ordered by this court in the Third District, with that election being conducted under strict adherence with the Wisconsin Election Code.

The complaint was not verified. (Exhibit J).

The same day the complaint was filed at 4:01 pm Derrick Van Orden tweeted the following:



(See, Van Orden tweet:

[https://mobile.twitter.com/derrickvanorden/status/1333878883238768642?ref\\_url=https%3a%2f%2fd-1385984482207901300.ampproject.net%2f2101211748002%2fframe.html](https://mobile.twitter.com/derrickvanorden/status/1333878883238768642?ref_url=https%3a%2f%2fd-1385984482207901300.ampproject.net%2f2101211748002%2fframe.html))

On December 2, 2020, the court entered an order highlighting several deficiencies in the unverified complaint and related papers that Mr. Wood and his co-counsel filed including:

- Failing to include the proposed order in the initial motion that was filed.
- Failing to ask for a hearing in the proposed order attached to the amended motion.
- Filings indicating that they had been forwarded to defense counsel with no address listed.
- Stating documents were filed under seal when they were not.

On December 3, 2020, Wood and co-counsel filed an amended complaint removing Derrick Van Orden as a plaintiff. It differed from the original complaint only in the removal of Van Orden as a plaintiff.

On December 9, 2020, the court entered an order dismissing the case. (Order, Exhibit K)  
The court determined:

- The plaintiffs brought the case in federal court, though state law governed the election process. (Exhibit K, p. 1).
- The court had no authority to grant plaintiff the relief he requested.
- Plaintiff did not have standing to sue.
- Most of the relief the plaintiff requested was moot.
- Plaintiff sued defendants who were either “not suable under section 1983 or [were] protected by Eleventh Amendment immunity.”
- Plaintiff falsely attributed a quote to *Swaffer v. Deininger*. (Exhibit K, pp. 32-33).

**Bowyer v. Ducey, CV-20-02321, U.S. District Court, District of Arizona**  
(Lin Wood-counsel for plaintiff)

On December 2, 2020, Lin Wood, along with other counsel, signed the complaint in *Bowyer v. Ducey*, CV-20-02321, which was filed in the U.S. District Court, District of Arizona. The plaintiffs sought to set aside the results of the 2020 General Election on the basis of alleged fraud and election misconduct. (Complaint, Exhibit L).

Though the complaint alleged that the election process was riddled with fraud and illegality, the plaintiffs presented little to no relevant or reliable evidence in support of their claims. U.S. District Court Judge Diane Humetewa dismissed the action, concluding:

Not only have Plaintiffs failed to provide the Court with factual support for their extraordinary claims, but they have wholly failed to establish that they have standing for the Court to consider them. Allegations that find favor in the public sphere of gossip and innuendo cannot be a substitute for earnest pleadings and procedure in federal court. They most certainly cannot be the basis for upending Arizona's 2020 General Election. The Court is left with no alternative but to dismiss this matter in its entirety. (Order, Exhibit M).

**Roslyn La Liberte vs. Joy Reid, 18-CV-5398, U.S. District Court Eastern District of New York**  
(Lin Wood as co-counsel for plaintiff)

In October 2018, Respondent was admitted *Pro Hac Vice* to the Federal District Court for the Eastern District of New York as co-counsel for Roslyn La Liberte, Plaintiff in a defamation case against Joy Reid (*La Liberte vs. Reid*, 18-CV-5398). By motion of January 25, 2021, counsel for Defendant requested that the court revoke Respondent's admission *Pro Hac Vice* “because, among other things, he has acted and is acting to subvert the United States Constitution and the rule of law, violated his ethical obligations under the New York Rules of Professional Conduct (“RPC”) and the New York Constitution, violated Federal Rule of Civil Procedure 11 and RPC 3.1, falsely attacked the Chief Justice of the United States Supreme Court, has recently been disciplined in another state court, and made misrepresentations to this Court.” (Motion to Revoke Pro Hac Status, Exhibit N).

The first four grounds for the Motion are discussed in other portions of this Memorandum of Grievance. The final ground, that Respondent made misrepresentations to the Court in the *La Liberte* matter, is based upon statements that Respondent made during a conference with the Court on January 11, 2021. (Transcript, Exhibit O). During the conference, Mr. Wood told the Court:

- “I have never advocated that anyone should break the law. I’ve advocated for people to follow the law.” (Exhibit O, p.15). Mr. Wood encouraged the conduct of individuals who committed federal offenses by breaking into the Capitol to unseat duly elected representatives and prevent the counting of electoral college votes and the peaceful transfer of power.
- “I didn’t call for the people to go up there and meet, I didn’t call for anybody to go to the Capitol.” (Exhibit O, p.9). Mr. Wood did, in fact, “call for” his supporters to storm and occupy the United States Capitol. On the morning of January 6, Mr. Wood posted to his 1.1 million Twitter followers that “[t]he time ha[d] come . . . to take back our country . . . to fight for our freedom.” . He wrote those words alongside an image stating that it was “1776 Again.” During the insurrection, as the mob was storming the Capitol building, Mr. Wood tweeted to his followers that they should follow the advice of Bill White to “enter the US Capitol Building . . . enter both houses . . . fight for us [and] . . . fight for Trump. . . .”
- “So there’s been no finding by any court that the evidence of election fraud is lacking. In fact, if they discussed it, they would have to say it was literally conclusive that there was fraud.” (Exhibit O, p.11). As set forth elsewhere in this Memorandum of Grievance, several courts have specifically found that there is no factual support for this claim.

### **Statements from Lin Wood**

- Statements by Wood regarding U.S. Supreme Court Chief Justice John Roberts
  - CJ Roberts knew in advance the date of Associate Justice Antonin Scalia’s death; is a “member of a club or cabal requiring minor children as an initiation fee”; arranged, for the purposes of pedophilia, an illegal adoption of children with the help of convicted sex-offender Jeffrey Epstein; who Wood claimed is still alive. (Twitter, Dec. 30, 2020).
  - “Hillary Clinton thought she had rigged the 2016 election. The plan after her election was to kill federal judges so that Hillary could stack the judiciary. US Supreme Court targeted. FBI was complicit.... Justice Scalia learned of

the plan to kill members of the judiciary. He reported it to the White House. Shortly thereafter, Scalia was killed....” (Telegram, Jan. 19, 2021).

- Statements by Wood regarding U.S. Vice President Mike Pence, former Deputy Attorney General Rod Rosenstein, and other U.S. government officials:
  - VP Pence “is a TRAITOR, a Communist Sympathizer & a Child Molester” (said same about “Chuck ‘Jeffrey Epstein Buddy’ Schumer” and “Mitch ‘Cocaine CCP’ McConnell”) who conspired with former DAG Rosenstein (who directed the murder of DNC employee Seth Rich in 2016) to overthrow the U.S. government and should be arrested and incarcerated for treason (Twitter, Jan. 6-7, 2021).
  - “If Pence is arrested, @SecPompeo will save the election. Pence will be in jail awaiting trial for treason. He will face execution by firing squad.” (Twitter, Jan. 1, 2021); “Get the firing squads ready. Pence goes FIRST.” (Parler, Jan. 7, 2021).
  - “Pence is on videos captured by FBI. Discussions about murdering judges. [CJ] Roberts was involved. So was Hillary Clinton.” VP Pence “used 13, 14, & 15 year old boys for his own self-serving purposes too. A very special place in Hell awaits Pence.” (Telegram -Jan. 19, 2021).
- Statements regarding Georgia officials and judges:
  - Wood led a rally in Georgia on Dec. 2, 2020, where he called for the imprisonment of Georgia Governor Brian Kemp and Secretary of State Brad Raffensberger for carrying out their duty of counting Georgia’s votes in the presidential election. Wood instructed persons at the rally to go to the Georgia Capitol and “circle it” to force a special session of the Georgia legislature to overturn the results of the election (<https://www.youtube.com/watch?v=ep1yCTpMJvc>, Video at 3:10).
  - Wood spread a conspiracy theory “that connect purported election fraud to a traffic accident that killed a 20-year-old worker on U.S. Sen. Kelly Loeffler’s campaign who dated one of Kemp’s daughters.” (<https://www.ajc.com/news/amid-personal-turmoil-libel-lawyer-lin-wood-goes-on-the-attack-for-trump/UBHBVKB65NGE7PU3RO5YYGTHXE/>)
- Statements regarding U.S Capitol violence:
  - “I have eternal life.... I don’t believe anyone died yesterday.... I think it was all staged. It was Antifa dressed up as Trump people.... I apply critical thinking and the instincts God gave me [to know this].... I’m not God.... I’m just a person who understands what’s going on and why.... If I am God, I’ve got one bad memory. I don’t remember creating myself, the clouds, the oceans, the stars. But do I try to live like God? This is the second harvest.



God is getting ready to show he's real again.... I'm afraid they're going to put me in jail, but that's where Paul wrote some of his greatest chapters of the Bible." (July 7, 2020 - Statement to New Yorker magazine writer Charles Bethea, "A Trump Holdout in Atlanta," New Yorker, Feb.1, 2021 issue, pp. 2-4/4).

- o Wood acknowledged that Ashli Babbitt, who was shot and killed while storming the Capitol, had retweeted Wood's claims regarding VP Pence, DAG Rosenstein and CJ Roberts the morning of the riots, prior to suggesting that Babbitt was still alive and reports of her death were part of a "false flag" operation by the "Deepstate" and Antifa against "Sheeple." (Exhibit G).

**Allegations Taken From Verified Complaint in *Wade, et al. v. Wood, Fulton Sup. Ct. CAFN 2020CV339937* (Verified Complaint, Exhibit P).**

- Beginning in the fall of 2019 and continuing into 2020, Wood began to display "erratic, abusive, and unprofessional behavior," with Wood becoming "increasingly ... hostile ... and threatening towards Plaintiffs Wade, Grunberg, and Wilson ("Plaintiffs"), his colleagues within his office, and sending "abusive, incoherent phone calls, voicemails, texts, and emails ... to [Plaintiffs] in the middle of the night." (Exhibit P, ¶¶ 3, 106-07; 111; 115).
- Wood physically attacked Wilson at Wood's home when Wilson came by out of concern for Wood's welfare. Wood physically attacked Grunberg in an elevator of a hotel during an out of town deposition. Wood later acknowledged and apologized for the attacks, (Verified Complaint ¶ 112), but in subsequent emails threatened to "beat" Taylor with a switch "till [she] couldn't sit down for 20 fucking years" and told Grunberg: "Man oh man, you're glad you're not with me in an elevator with me right now buddy...." (Exhibit P, ¶¶ 142; 143).
- Wood specifically threatened to "destroy" Grunberg and Wilson, saying about Wilson specifically: "'by the time I am through with Taylor Wilson, he's going to wish all I had done was fuck his wife.'" On March 3, 2020, Wood called and left a voicemail for Wilson's wife professing his love for her and her family. (Exhibit P, ¶¶ 118; 159-60).
- On Feb. 13, 2020, after Plaintiffs agreed to reconsider leaving the firm, Wood hosted a teleconference in which Wood: referred to himself as Almighty; offered to fight the individual Plaintiffs to the death; demanded the Plaintiffs' undying loyalty; threatened to "hurt" the Plaintiffs; offered to have the Plaintiffs stay in the firm; and called Plaintiff Grunberg a "Chilean Jew"; demanded that he admit he does not look like the other lawyers in the firm; stated to Plaintiffs that he "had the power to hurt ya, to hurt your families, to hurt your law careers...." Wood stated: "Now I'm gonna tell you something very surprising, y'all just heard from the Almighty Lin and it sounds powerful and you believe it don't ya? ... Almighty Lin just told you what would happen if he thinks you ever, in his opinion, discerns that you're being disrespectful to me by anything other than an accident or mistake, he's gonna throw you out. Ya hear me? ... Now Almighty Lin's gonna tell you this ... the power that I just had can change your life if I ever decide ...

even if it's good or bad, I can change your life with the exercise of that power, right? ...” Wood stated: “I’ll commit sins. I’ll [physically] push you when you piss me off.” Wood stated: “I might make the same mistake then that I made then, I might push you and I wouldn’t mean to hurt you. I wouldn’t mean to push you around, especially cause either one of you would whip my ass or maybe you wouldn’t cause you don’t have the courage I have. Maybe I would fight you till you damn die. Or both of us died. Cause I got courage inside of every bone in my body that you’ll never know.” (Exhibit P, ¶ 124).

- Wood declared that he was “doing God’s will”; threatened to bring down “the wrath of God”; and promised that Plaintiffs would be punished “at the discretion of Almighty God”; said “God Almighty told me to get you back to where you belong. Broke and essentially homeless.... You all better get on your knees and pray to Almighty God that He now asks me to show you mercy”; threatened “Unless I change my mind under the instructions of God, you are in for the roughest ride of your lives. I’m going to teach you all a lesson that you are going to learn....”; and threatened “I will deliver a fiery judgment against you on earth. Who the fuck did you think you were dealing with? You were screwing around me with, but I was someone else in disguise. You in fact have been screwing around with God Almighty....” (Exhibit P, ¶ 132-34).
- As Wood and Plaintiffs engaged in settlement negotiations, Wood “repeatedly voiced his concerns about his [above-listed] misconduct being disclosed as he feared it would interfere with his imminent receipt of the Presidential Medal of Freedom and appointment as Chief Justice of United States Supreme Court. The latter belief was based, in part, on (1) a decade-plus old “prophecy” Defendant Wood heard in a YouTube video, and (2) a conspiracy theory that Chief Justice Roberts would be revealed to be part of Jeffrey Epstein’s sex trafficking ring and was being blackmailed by liberals to rule in their favor.” (Exhibit P, ¶ 164).

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

**TIMOTHY KING, MARIAN ELLEN  
SHERIDAN, JOHN EARL HAGGARD,  
CHARLES JAMES RITCHARD, JAMES  
DAVID HOOPER and DAREN WADE  
RUBINGH,**

**Plaintiffs.**

**v.**

**GRETCHEN WHITMER, in her official  
capacity as Governor of the State of  
Michigan, JOCELYN BENSON, in her  
official capacity as Michigan Secretary of  
State and the Michigan BOARD OF STATE  
CANVASSERS.**

**Defendants.**

**CASE NO.**

**COMPLAINT FOR DECLARATORY, EMERGENCY,  
AND PERMANENT INJUNCTIVE RELIEF**

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