



August 19, 2025

Pam Bondi, Esq.  
Attorney General of the United States  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

Please accept this correspondence in response to your letter dated August 13, 2025. Foremost, I am requesting that you immediately cease and desist all direct communication with me regarding the subject of the litigation *The United States of America vs. City of Hoboken, and Ravinder Bhalla, Mayor of Hoboken, in his official capacity et al.*, Docket No.: 2:25-cv-05081-EP filed by your office.

As you should be aware, the Rules of Professional Conduct ("RPC") prohibit you from directly communicating with represented parties about the subject of the representation. Specifically, RPC 4.2<sup>1</sup> provides in relevant part that "[i]n representing a client, a lawyer shall not communicate about the subject of the representation with a person the lawyer knows, or by the exercise of reasonable diligence should know, to be represented by another lawyer in the matter."

On May 22, 2025, your office filed the above-referenced litigation naming me in my official capacity as the mayor of Hoboken. Similar to your August 13<sup>th</sup> letter, that lawsuit challenges the legality of the same policies you assert in your letter are unlawful. Accordingly, your August 13<sup>th</sup> communication to me, as a party in a lawsuit your office filed over the same dispute, is a potential violation of RPC 4.2, as are many similar letters sent to other mayors across the country who are also subject to "sanctuary city" litigation filed by your office.

Your August 13, 2025, letter is even more egregious because you have raised the specter of criminal charges if I continue to fulfill my oath and duty to defend Hoboken against your

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<sup>1</sup> I note that you are licensed to practice law in Florida which has the same prohibition. See Fla. Bar Code Prof. Resp. DR 7-104

lawsuit. This conduct is a potential violation of RPC 3.4<sup>2</sup>. RPC 3.4 entitled "Fairness to opposing party and counsel" provides in relevant part that "[a] lawyer shall not: ... (g) present, participate in presenting, or threaten to present criminal charges to obtain an improper advantage in a civil matter." Put simply, you are not permitted to threaten someone with criminal charges if they do not succumb to the demands you are making in court.

Your August 13<sup>th</sup> letter is even more distressing because you are engaging in this conduct in your capacity as the Attorney General of the United States of America. Based on the foregoing, I will refer this matter to the State of New Jersey Office of Attorney Ethics and the Florida Bar's Division of Lawyer Regulation, for review and further action if appropriate.

Next, your various assertions related to Hoboken's status as a Fair & Welcoming City (a.k.a. "sanctuary city") are completely false and without merit. We will not capitulate to your demand that we rescind our policies, and in this case our morals and values. Similar to the rest of America, Hoboken is a city of immigrants. We are a city built by immigrants and we have and will continue to support our immigrant population. We will continue to ensure that all people living in and visiting Hoboken are accorded equal rights under the law, as provided for by the United States Constitution.

Accordingly, in response to your August 13<sup>th</sup> letter, please be advised that we proudly affirm our identity as a Fair & Welcoming City. Furthermore, in light of the daily unlawful federal immigration enforcement activities that we, and the rest of the country, witness on a daily basis both in our communities and in media reports, it is our firm intention to revisit these policies to identify where they may be revised to protect against the activities taking place in various jurisdictions, and ensure our residents and visitors are not subjected to similar treatment.

My primary responsibility as Hoboken's mayor is to protect our residents and ensure their safety. As the nation witnesses the tearing apart of families, inhumane treatment of human beings, and unlawful detention of children, Hoboken will not bend its knee in response to the lawlessness of federal immigration authorities.

You are once again directed to refrain from contacting me directly. Please contact our city attorney on all future communications.

Very truly yours,



Ravi S. Bhalla  
Mayor

cc: Brian Aloia, Esq. (via email)

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<sup>2</sup> Fla. Bar Code Prof. Resp., D.R. 7-105(A), also specifically provides that "[a] lawyer shall not present, participate in presenting, or threaten to present criminal charges solely to obtain an advantage in a civil matter"