

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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CAMPAIGN LEGAL CENTER	)
1411 K Street, NW, Suite 1400	)
Washington, DC 20005,	)
	)
Plaintiff,	)
	)
v.	)
	)
FEDERAL ELECTION COMMISSION	)
999 E Street, NW	)
Washington, DC 20463,	)
	)
Defendant.	)

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Case No. 1:18-cv-00053-TSC

**NON-PARTY MOTION TO DISQUALIFY ADAV NOTI AS COUNSEL FOR PLAINTIFF  
IN THIS ACTION**

GEO Correction Holdings, Inc. (“GEO”), appearing before this Court for the limited purpose of filing the present motion and participating in the proceedings related to this motion, moves this Court to disqualify Adav Noti as counsel for Plaintiff Campaign Legal Center.

Mr. Noti’s representation of Plaintiff creates an impermissible conflict of interest because Mr. Noti is a former, high-ranking employee of Defendant Federal Election Commission. Mr. Noti was an employee of Defendant Federal Election Commission’s Office of General Counsel at the time his current employer, Plaintiff Campaign Legal Center, filed the administrative complaint that is the subject of this litigation. The violation of law alleged by Mr. Noti in the present litigation began and/or occurred while Mr. Noti was an employee of Defendant. These circumstances present “a substantial possibility

of an unfair advantage to the current client because of counsel's prior representation of the opposing party.” *Koller v. Richardson-Merrell*, 737 F.2d 1038, 1056 (D.C. Cir. 1984) *vacated on other grounds*, 472 U.S. 424 (1985). Mr. Noti’s representation of Plaintiff in this matter threatens the “integrity of the judicial and administrative processes,” raises questions about “the safeguarding of confidential governmental information from future use against the government,” and creates “the appearance of impropriety which may affect the perceived integrity of the agency.” *Kessenich v. Commodity Futures Trading Com.*, 684 F.2d 88, 95-97 (D.C. Cir. 1982) (internal citations omitted).

As set forth more fully in the accompanying memorandum in support of this motion, GEO respectfully requests that this Court disqualify Mr. Noti as counsel for plaintiffs.

Respectfully submitted,

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