Supreme Court of Wisconsin

NO. 2024AP2045-D OFFICE OF LAWYER REGULATION V. ANGELA W. DEBOSE

June 17, 2026

The Court has entered the following order:

The court has before it a March 6, 2025 report filed by Referee L. Michael Tobin recommending that this court dismiss a disciplinary complaint filed against Attorney Angela W. DeBose for failure to state a claim. No appeal has been filed, so we consider this matter pursuant to Supreme Court Rule (SCR) 22.17(2).[1] For the reasons explained below, we disagree with the referee's recommendation. We therefore vacate the referee's report and remand this matter for further proceedings.

The factual and procedural background of this case is as follows. Attorney DeBose obtained her Wisconsin law license in 2015. She does not have an address on file with the State Bar of Wisconsin. In her filings in this court, Attorney DeBose lists a mailing address in Tampa, Florida. She is not a member of the Florida Bar.

In October 2024, the Office of Lawyer Regulation (OLR) filed a disciplinary complaint against Attorney DeBose alleging that she is subject to discipline for violating two Florida rules of professional conduct in the course of her extensive pro se litigation in Florida state and federal courts. According to the OLR's complaint and its attachments, years earlier, in 2015, Attorney Debose brought a pro se lawsuit in federal court against the University of South Florida and its software consultant, Ellucian LP, alleging employment discrimination and retaliation, among other claims. After her efforts in that case ultimately proved unsuccessful, Attorney Debose brought a series of similarly unsuccessful lawsuits in Florida state and federal courts against a variety of defendants,

[1] Supreme Court Rule 22.17(2) states, "If no appeal is timely filed, the supreme court shall review the referee's report; adopt, reject or modify the referee's findings and conclusions or remand the matter to the referee for additional findings; and determine and impose appropriate discipline."

including the University of South Florida, its trustees, its lawyers, individual judges, the United States, and others.

The OLR attached to its complaint a September 12, 2022 order from Judge Steven D. Merryday of the United States District Court for the Middle District of Florida. In his order, Judge Merryday summarized Attorney DeBose's pro se litigation efforts in Florida as follows:

> After losing [her initial] action, DeBose has persisted in suing [University of South Florida], the members of the Board of Trustees, [the University's] lawyers, and Ellucian. DeBose lost each action on the merits, sued again, and lost each successive action as barred by res judicata and collateral estoppel, among other things. Rather than acknowledge the finality of those judgments, DeBose has chosen resistance and disruption in the form of further actions that feature increasingly bizarre, uncorroborated, and fantastical allegations of conspiracy (such as the allegation that the federal judges of this district belong to "secret societies" including the "Elizabethan Order.").

Judge Merryday further observed that "DeBose, a lawyer admitted to the bar of the state of Wisconsin, either fails to comprehend the fundamentals of litigation or, regardless of the fundamentals of litigation, chooses for whatever reason to wantonly vex her adversaries." Judge Merryday warned that "[n]othing in DeBose's conduct in her seven years of litigation against [the University of South Florida] suggests that DeBose will accept the judgment in this action (or any other action) and refrain from contriving another litigation mechanism method to harass [the University] and other perceived adversaries."

Ultimately, Judge Merryday dismissed Attorney DeBose's action before him and enjoined her from filing in the U.S. District Court for the Middle District of Florida any pro se complaint, petition, or claim about the subject of her employment litigation without the document being signed by a lawyer admitted to the Florida Bar and the Bar of the Middle District of Florida.

Judge Merryday attached to his order an order issued by Judge Melissa M. Polo, who presides over the Thirteenth Judicial Circuit Court for Hillsborough County, Florida. Judge Polo's order recited Attorney DeBose's extensive pro se litigation history in state court and noted that, despite being ordered multiple times not to file papers in closed cases, Attorney DeBose continued to do so. Judge Polo wrote that "[t]he result of DeBose's prolific and meritless filings is an extreme waste of time and judicial resources at both the trial and appellate levels." Judge Polo enjoined Attorney DeBose from: (1) appearing before that court unless she is represented by a member in good standing of

the Florida Bar; and (2) filing further documents in that court unless the document is signed by a member in good standing of the Florida Bar.

In his order, Judge Merryday instructed the clerk of court to mail a copy of his order to the OLR. This, in turn, led to the OLR filing a disciplinary complaint against Attorney DeBose in October 2024.

In its complaint, the OLR alleged that the Florida rules of professional conduct (hereafter, the "Florida Rules") apply to Attorney DeBose's conduct. The OLR brought two misconduct counts against Attorney Dubose.

The OLR's first count alleged that "[b]y repeatedly relitigating her underlying Title VII and retaliation claims in nine cases for more than seven years despite the claims being barred by numerous courts on various grounds including res judicata and collateral estoppel," Attorney DeBose violated Florida Rule 4-3.1. This rule provides: "A lawyer shall not bring or defend a proceeding, or assert or controvert an issue therein, unless there is a basis in law and fact for doing so that is not frivolous, which includes a good faith argument for an extension, modification, or reversal of existing law."

The OLR's second count alleged that "[b]y alleging that the Florida state judges in the Thirteenth Judicial Circuit convened a 'judicial conspiracy or racket' to assign judges favorable to [University of South Florida], and that federal judges in the United States District Court for the Middle District of Florida were corrupt and conspiring against her, when she knew those allegations were false or acted with reckless disregard as to the truth or falsity of the allegations," Attorney DeBose violated Florida Rule 4-8.2(a). This rule provides: "A lawyer shall not make a statement that the lawyer knows to be false or with reckless disregard as to its truth or falsity concerning the qualifications or integrity of a judge . . . ."

Attorney DeBose moved to dismiss the OLR's complaint on various grounds. She also filed an answer to the complaint.

The referee issued a scheduling order raising the following question: "Under what circumstances, if any, do the Florida Rules of Professional Conduct (alleged by OLR to be the applicable ethical rules in this proceeding) apply to conduct of a pro se litigant licensed as an attorney in Wisconsin?"

The parties filed responsive briefs. The OLR argued that Wisconsin's choice-of-law provision in SCR 20:8.5(b)(1) requires that the Florida Rules apply to Attorney DeBose given that her conduct was "in connection with a matter pending before a

tribunal" that "sits" in Florida.[2] Conversely, Attorney DeBose argued that the Florida Rules do not apply to her because she "is not licensed or certified to practice law in Florida. She is not a member of the Florida Bar and not subject to disciplinary action. [She] may constitutionally represent herself pro se without being subject to the Florida Rules of Professional Conduct."

The referee sided with Attorney DeBose. The referee reasoned that while the OLR is correct in stating the Florida Rules apply pursuant to SCR 20:8.5(b)(1), Attorney DeBose is "exempt" from those rules because "Florida cannot impose professional discipline against" a non-member of its bar who never "received any notice, as a pro se litigant, that she could be subject to the [Florida Rules]." Because "Wisconsin defers to Florida law in this circumstance, *see* SCR 20:8.5(b)(1)," the OLR's complaint should be dismissed, the referee wrote. In the referee's view, "[i]f SCR 20:8.5(b)(1) is applied fully and literally, Wisconsin (like Florida) has no authority to discipline DeBose."

We disagree. Attorney DeBose is a member of the Wisconsin Bar and by that fact alone is subject to our disciplinary authority "regardless of where [her] conduct occurs." SCR 20:8.5(a).[3] This rule makes intuitive sense—a lawyer's professional fitness is determined by all relevant conduct by the lawyer, not just that occurring inside Wisconsin state lines. Here, Attorney DeBose's conduct in Florida courts reflects on her fitness to practice in Wisconsin courts, so it is appropriate (and authorized by our rules) for us to have disciplinary authority over that conduct. The prospect that the Florida Supreme Court may or may not lack disciplinary authority over Attorney DeBose's pro se litigation conduct (a legal question we do not address here) is irrelevant for our purposes; whatever the answer, our disciplinary authority under SCR 20:8.5(a) is clear.

We also deem unfounded the referee's concern that Attorney DeBose lacked notice that we would measure her conduct in Florida courts against the Florida Rules. As a Wisconsin-licensed lawyer, we expect Attorney DeBose to know and follow our rules of

[2] SCR 20:8.5(b)(1), titled "Choice of Law," states, "In the exercise of the disciplinary authority of this state, the Rules of Professional Conduct to be applied shall be as follows: (1) for conduct in connection with a matter pending before a tribunal, the rules of the jurisdiction in which the tribunal sits, unless the rules of the tribunal provide otherwise[.]"

[3] SCR 20:8.5(a), titled "Disciplinary Authority," states, "A lawyer admitted to the bar of this state is subject to the disciplinary authority of this state regardless of where the lawyer's conduct occurs. A lawyer not admitted to the bar of this state is also subject to the disciplinary authority of this state if the lawyer provides or offers to provide any legal services in this state. A lawyer may be subject to the disciplinary authority of both this state and another jurisdiction for the same conduct."

professional conduct—including SCR 20:8.5(b)(1), which, again, provides that "for conduct in connection with a matter pending before a tribunal, the rules of the jurisdiction in which the tribunal sits" (here, Florida) shall apply, "unless the rules of the tribunal provide otherwise." By its plain terms, this rule applies to Attorney DeBose's Florida-court behavior regardless of her unlicensed, pro se status in those courts. *See Att'y Grievance Comm'n of Maryland v. Whitted*, 319 A.3d 1116, 1131-32 (Md. 2024) (disciplining Maryland attorney who was not licensed in Washington for his frivolous pro se litigation in Washington courts; applying Washington's professional conduct rules pursuant to Maryland rule identical to SCR 20:8.5(b)(1)).

For the above reasons,

IT IS ORDERED that the referee's March 6, 2025 report is vacated, and this matter is remanded to the referee for further proceedings.

Samuel A. Christensen
Clerk of Supreme Court

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