



Office of Bar Counsel

P. O. Box 895 • Boise, Idaho 83701
(208) 334-4500 • Fax: (208) 334-2764
www.idaho.gov/isb

July 22, 2024

PERSONAL & CONFIDENTIAL

Raul R. Labrador



Re: Dave Jeppesen v. Raul R. Labrador
ISB File No. 23-210C

Dear Mr. Labrador:

Our office has received a grievance filed against you by Dave Jeppesen, former Director of the Idaho Department of Health and Welfare (“IDHW”), on his behalf as well as on behalf of the IDHW (collectively referred to as “Clients”). A copy of the grievance, the materials submitted with that grievance, and any materials obtained during our initial review are enclosed. To assist our preliminary review, Bar Counsel requests that you please provide a response to the following:

1. Please address Mr. Jeppesen’s contention that by allegedly placing your own “policy priorities” and “policy objectives” over your Clients’ need for legal advice and representation, which resulted in the filing of Ada County Case No. CV01-23-04832, you failed to abide by your Clients’ decisions concerning the objectives of representation and failed to consult with your Clients as to the means by which the objectives were to be pursued, with reference to I.R.P.C. 1.2(a);
2. With respect to the issue in 1. above, please address Mr. Jeppesen’s contention that you allegedly failed to reasonably consult with your Clients, failed to keep your Clients reasonably informed and failed to promptly comply with your Clients’ reasonable requests for information, with reference to I.R.P.C. 1.4;
3. Please address Mr. Jeppesen’s contention that you allegedly revealed confidential information regarding your representation of your Clients without informed consent, with reference to I.R.P.C. 1.6(a);
4. Please address Mr. Jeppesen’s contention that by allegedly representing your Clients in some matters/litigation and being adverse to your Clients in other matters/litigation, you engaged in a concurrent conflict of interest, with reference to I.R.P.C. 1.7 and 1.11(d)(1);
5. Please address Mr. Jeppesen’s contention that you allegedly used information relating to your representation of your Clients to the disadvantage of your Clients without informed consent; with reference to I.R.P.C. 1.8(b);

Raul R. Labrador

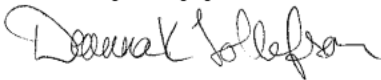
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6. Please address Mr. Jeppesen's contention that when you allegedly made false claims to the media regarding your Clients, your representation of your Clients, and the conflict of interest that the Court found in its August 10, 2023 Memorandum Decision and Order, you engaged in conduct involving dishonesty, fraud, deceit or misrepresentation, with reference to I.R.P.C. 8.4(c); and
7. Please address Mr. Jeppesen's contentions that by allegedly engaging in the conduct described in 1. through 6. above, as well as investigating your own Clients, which required your Clients to retain and compensate alternate counsel, you engaged in conduct that was prejudicial to the administration of justice, with reference to I.R.P.C. 8.4(d).

Please provide your response and any documentation in support of your position within twenty-one (21) days of the date of receipt of this letter. If you need additional time to respond or are unable to comply with this request, please contact me by email at [REDACTED].

Very truly yours,



Deanna K. Tollefson
Investigator, Office of Bar Counsel

Enclosures

cc: Dave Jeppesen (w/o enclosures)