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November 23, 2016

Office of the Disciplinary Counsel
Louisiana Attorney Disciplinary Board
4000 S. Sherwood Forest Blvd., Suite 607
Baton Rouge, Louisiana 70816

FAX (225) 293-3300

Re: ETHICAL CONDUCT COMPLAINT MR. IAIN ARMSTRONG DOVER

Dear Disciplinary Counsel:

My office represents Ms. [REDACTED] and her daughter [REDACTED] who the New Orleans District Attorney alleged is a victim of child molestation and child pornography in case Number 523930 presently pending in Orleans Parish Criminal District Court "J", prosecuted by Deputy District Attorney Iain Armstrong Dover.

On or about September 9, 2016, I sent a FAX to Mr. Dover's office indicating my representation and that I had instructed my clients not to talk to any law enforcement agency about any matter without an attorney from my office being present.

A review of the Louisiana Statutes and Constitution shows a defined right to privacy in addition to the Federal Constitutional Right to Privacy. In addition, the Louisiana Constitution also provides a state right to Due Process. Also Louisiana Constitution, Article I, Section 25, specifically assures that alleged crime victims will be treated with dignity and respect. Although it seems this is a poorly drafted Section as it does not truly provide for *all* rights of alleged victims, it does form a basis to protect my clients.

I specifically asked the District Attorney's Office "...that you, your offices, any investigators or any law enforcement agencies refrain from contacting them in any manner concerning the alleged offenses. **Please honor their right to privacy, their right to be left alone.** They do not want to be badgered, bothered or harassed by anyone from law enforcement in any way.

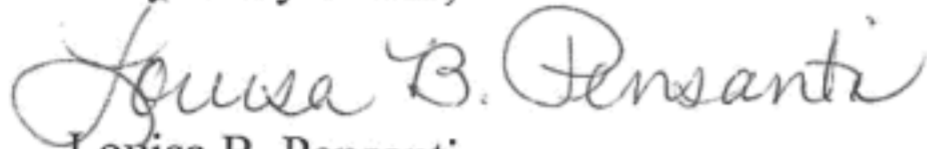
If you have any questions, please direct them to me. Any efforts to the contrary will be considered a violation of my clients' constitutional rights for which we will seek appropriate relief. **Please make sure that this information is communicated to all pertinent personnel.**"

Instead of contacting me, District Attorney Dover along with District Attorney Investigator O'Hearn drove to my client's home to serve a subpoena and made an illegal entry into the house through a door to leave the paperwork. This break-in was recorded on surveillance video and will be provided upon request.

Additionally, when minor child [REDACTED] presented herself to the District Attorney's office pursuant to the subpoena, District Attorney Investigator O'Hearn attempted to hug her, while Mr. Dover invited her to "take a swing" at him to make her feel better. These acts by government officials, one of whom is an attorney at law is reprehensible and violates ethical rules of conduct.

My clients are requesting an investigation of Mr. Dover's unlawful and unethical actions.

Very Truly Yours,

A handwritten signature in cursive script that reads "Louisa B. Pensanti". The signature is written in dark ink and is positioned above the typed name.

Louisa B. Pensanti
Attorney at Law