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December 22, 2025

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Seth Aaron Stern Esq.

Sent via email only to: seth@pressfreedomfoundation.org

**Re: Carr/ Stern
Undocketed No. 2025-U1307**

Dear Mr. Stern:

We reviewed the disciplinary complaint that you filed against Brendan T. Carr. As the Director of Advocacy for the Freedom of the Press Foundation, you filed a complaint against Mr. Carr, the Chairman of the Federal Communications Commission. You allege that Mr. Carr used a “frivolous” lawsuit to improperly force a settlement and payment from Paramount. You also claim that he “threatened” retaliatory action against media organizations to restrict constitutionally protected speech. Generally, you claim that he as abused his position as FCC Chairman, which resulted in attempted or actual violations of the First Amendment.

We are unable to docket this matter for further investigation. The Office of Disciplinary Counsel has jurisdiction to enforce the D.C Rules of Professional Conduct, a set of written rules adopted by the District of Columbia Court of Appeals. We docket cases for further investigation when the complaint: (1) is not unfounded on its face; (2) contains allegations which, if true, would constitute a violation of the Attorney’s Oath of Office or the Rules of Professional Conduct that would merit discipline; and (3) concerns an attorney admitted to practice law in the District of Columbia.

We do not believe that the allegations of your complaint, if true, violate the Rules of Professional Responsibility or the attorney’s Oath of Office. Most of the allegations of which you complain, such as the process of approving the Paramount-Skydance merger/acquisition, are disagreements with the policy decisions of a regulatory agency which present legal and political issues beyond the jurisdiction or competency of this Office to resolve. Regarding the specific Rules cited in your complaint, the factual allegations do not align with the language of those Rules and how they have been applied by the D.C. Court of Appeals. The allegations involving the intimidation of broadcasters raise questions of First Amendment violations, potentially contrary to the attorney’s oath to support the Constitution.

Serving the District of Columbia Court of Appeals and its Board on Professional Responsibility

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But broadcasting is a regulated industry, and there are limitations on the right of free expression. In this context, we do not believe that such conduct violated the First Amendment and therefore the attorney's oath.

Accordingly, we have closed this file. Thank you for bringing your concerns to our attention.

Sincerely,

s/Hamilton P. Fox

Hamilton P. Fox, III
Disciplinary Counsel

HPF:lnm