Butler Snow: Johnson v. Dunn AI citations

IMPLEMENTED 2023–2025 · PROFESSIONAL SERVICES · US · BAND F · PROVED
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Lawyers at Butler Snow filed two motions with case citations made up by ChatGPT. A federal judge publicly reprimanded and disqualified three of them; the firm, which had an AI policy, was released without sanction.

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NOTICE WORDING LAST UPDATED 16 NOVEMBER 2026

AT A GLANCE

What went wrong: AI output or malfunction; Weak oversight or controls.

AI used: Generative AI chatbot used for legal research: ChatGPT.

Implemented: 2023–2025. Grade: band F, Failure, Proved.

Headline result, as reported: Three Butler Snow lawyers reprimanded, disqualified and referred to licensing authorities over ChatGPT-fabricated citations, July 2025

1 · The case

The facts, as reported by the 2 sources listed at the end. Where a source is silent, the field says "Not reported".

Organisation

Butler Snow LLP. US law firm. Its attorneys represented Jefferson Dunn, former Commissioner of the Alabama Department of Corrections, in a civil rights case brought by an incarcerated plaintiff in the Northern District of Alabama. Canvas block: 8. Governance and risk. Also 5. People and skills, 6. Data and technology.

Business challenge

The challenge. Not reported as a business aim. One attorney told the court he used ChatGPT to find case citations for two arguments.

How it was addressed. In June 2023 the firm's general counsel emailed all attorneys warning that AI output can look well researched while being wholly inaccurate, and set a policy requiring

Who implemented it

ChatGPT was used by an individual attorney outside firm policy; no deployment partner.

Technology (SEAM pillar E)

SEAM types: T1 Chat assistants. Deployment: Vendor SaaS. Vendors and products: OpenAI, ChatGPT.

Where it was built in: Used by one attorney, outside firm policy, to obtain case citations that were added to two court motions.

What changed

Before: an AI policy and warning existed, and the attorney said he knew of the limitation but did not comply. After: the court disqualified three attorneys from the case and referred them to licensing authorities; the firm committed to training and a prefiling protocol requiring review of every citation. [1] [2]

Cost of failure

No fine. Three attorneys publicly reprimanded, disqualified from further participation in the case and referred to the Alabama State Bar and other licensing authorities; ordered to give a copy of the order to clients, opposing counsel and judges in every pending case. The firm's costs of review and investigation: Not reported.

What it saved

Not reported [1] [2]

Governance and control

The court found that the firm acted reasonably to prevent the misconduct, citing its 2023 warning and permission policy and its response, and released it from the proceedings. It held that the attorney who used ChatGPT, and two who signed or led the filings, acted with recklessness tantamount to bad faith.

S2 · Accountable owner · Evidenced
The court found every attorney on the signature block responsible, and noted the firm's general counsel issued the AI policy and led its response. [1]

A1 · Safe use · Evidenced
The court recorded the firm's June 2023 warning and its policy requiring written permission from a practice group leader to use the technology. [1]

A2 · Human in the loop · Missing (independent source shows it was absent)
The citations were not verified before filing; the court found three attorneys reckless in failing to check them. [1]

A3 · Monitoring and assurance · Evidenced
After the error the firm reviewed filings in its cases and commissioned an independent investigation, which the court relied on. [1]

A4 · Vendor AI · Not reported
A publicly available chatbot was used outside firm policy; no vendor controls are reported. [1]

A5 · Agent controls · Not reported
No agents described.

A6 · Standards and regulation · Outside scrutiny (a regulator, court, auditor or similar body acted)
The US District Court for the Northern District of Alabama reprimanded, disqualified and referred three attorneys to licensing authorities, and released the firm. [1] [2]

What worked, what did not, what is unproven

WORKED

– The court cited the firm's existing policy and its response as reasons to release the firm without sanction.

DID NOT

– The firm's policy did not stop one attorney using ChatGPT without permission or verification.

– Other attorneys whose names were on the filings did not check the citations; the court found two of them reckless.

– The firm had no specific policy on who appears on a filing's signature block, its general counsel told the court.

– Under the firm's then-existing policy, practice group leaders did not have to seek permission to use AI, its counsel confirmed at the hearing.

UNPROVEN

– Whether the firm's training and prefiling protocol have prevented further errors.

Timeline

Jun 2023 Firm's general counsel warns all attorneys of the risks of AI output and sets a permission policy [1]

May 2025 Court orders the attorneys and the firm to show cause over fabricated citations in two motions [1]

Jul 2025 Court reprimands, disqualifies and refers three attorneys; releases the firm without sanction [1]

2 · Grade and SEAM assessment

MarLuc's opinion, made on the evidence above. How cases are graded: marluc.co.uk/case-studies/how-we-rate

Level of change and impact

Claimed: Not applicable. Grade: F, Failure. Proof: Proved. Level of change: Not graded.

No level assessed: band F, a proved failure. A federal court sanctioned lawyers for filing AI-fabricated citations despite a firm policy.

The SEAM view and lessons learnt

The firm had a policy, but the control depended on each lawyer following it. The court treated a written policy and a strong response as reasons not to sanction the firm, and treated every lawyer on the signature block as responsible for checking citations. For a professional firm, the lesson is to build the check into the filing process itself.

1. Build citation checks into the filing process, not only into policy.
2. Make everyone who signs a document responsible for verifying it.
3. Respond to an AI error quickly, openly and with an independent review.

Evidence

Score 3 of 4. Independent: a published federal court opinion with written reasons.

Evaluation method. Court or tribunal finding: Johnson v. Dunn, 792 F.Supp.3d 1241 (N.D. Ala. 2025), after written responses and a show cause hearing.

Status. Closed for the sanctions proceedings: order of 23 July 2025. Outcome of bar referrals: Not reported.

3 · Original sources

Read these in full. To challenge a fact or a grade, use the contact form at marluc.co.uk or the link on https://marluc.co.uk/case-studies/butler-snow-johnson-v-dunn-ai-citations

[1] Johnson v. Dunn, 792 F.Supp.3d 1241 (N.D. Ala. 2025), opinion of 23 July 2025 (reprint hosted by Berkeley Law)
https://www.law.berkeley.edu/wp-content/uploads/archive/2025/12/Johnson-v-Dunn.pdf

[2] Bloomberg Law: Butler Snow Attorneys Disqualified Over Fake AI Case Citations (24 July 2025)
https://news.bloomberglaw.com/esg/butler-snow-attorneys-disqualified-over-fake-ai-case-citations

Butler Snow LLP website: https://www.butlersnow.com

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