DISTRICT COURT OF APPEAL OF FLORIDA
SECOND DISTRICT

STEVE ELIE,

Appellant,

v.

CARINE ELIE,

Appellee.

No. 2D2026-0508

November 18, 2026

Appeal pursuant to Fla. R. App. P. 9.130 from the Circuit Court for Hillsborough County; Jessica G. Costello, Judge.

Steve Elie, pro se.

Jeffrey Grabel and Raeseen Kennedy of Bay Area Legal Services, Inc., Tampa, for Appellee.

PER CURIAM.

We affirm without discussion the trial court's order denying appellant Steve Elie's motion to set aside a final judgment of injunction for protection against domestic violence. Given Mr. Elie's repeated citation to nonexistent cases in his briefs, however, we are obliged to comment on his apparent use of generative artificial intelligence (AI) without verifying the accuracy of the results.

We expect pro se parties—and certainly those like Mr. Elie who appear before us repeatedly—to familiarize themselves with this court's

practice preferences and to review them for any updates. They are published prominently on our website and include a section dedicated to the appropriate use of generative AI. *See Practice Preferences*, Fla. 2d Dist. Ct. App., https://2dca.flcourts.gov/Practice-and-Procedures/practice-preferences (last visited Oct. 16, 2026). As we summarize in those preferences:

> If you elect to utilize generative AI for any part of a brief or petition filed in this court, understand that you are solely responsible for ensuring that all the cases, statutes, and legal authorities in the brief exist, have been accurately cited, have been accurately quoted, and support whatever legal proposition you have asserted in your filing.

Id. Although our practice preferences lack the force of law, they provide guidance to pro se parties and emphasize important mandatory rules, such as Florida Rule of General Practice and Judicial Administration 2.515(d)(2), which provides, "On filing, each signer represents that . . . the legal authorities identified exist and are accurately cited."

Given the extensive media attention to the issue, even pro se parties should be aware that generative AI is far from foolproof—its tendency to hallucinate is simply too well known and too well publicized. And specifically in the legal arena, Florida courts have been warning pro se parties for the last three years that generative AI can make up legal authority, such as nonexistent cases, fabricated quotations, and misattributions of supposed legal propositions to real cases. *See, e.g.*, *Gleason v. Marcus*, 432 So. 3d 1265, 1265 (Fla. 2d DCA 2026) ("sound[ing] the alarm" to pro se parties on the risks of the use of unverified AI-generated text); *Goya v. Hayashida*, 418 So. 3d 652, 656 (Fla. 4th DCA 2025) (warning a pro se party who had filed a "counterfeit brief" based on AI hallucinations "that the Court will not regard similar infractions as mildly in the future"); *Gutierrez v. Gutierrez*, 399 So. 3d

1185, 1188 (Fla. 3d DCA 2024) (imposing sanctions against a pro se party based on the filing of "fictitious case law").

We caution Mr. Elie that in any future filings with this court (whether in this appeal or in other appeals), he must comply fully with rule 2.515(d)(2). Otherwise, he risks sanctions, which include but are not limited to striking of the offending filings, dismissal of the appeal, an award of attorney's fees to the opposing side, fines, and an order barring further pro se filings. *See* Fla. R. Gen. Prac. & Jud. Admin. 2.515(d)(2); *Washington v. Justice*, 51 Fla. L. Weekly D2082 (Fla. 2d DCA Oct. 7, 2026) (dismissing an appeal in part because of AI hallucinations in the pro se parties' initial brief and requiring that any future filings be made by an attorney); *Cap. Standard, LLC v. U.S. Bank Nat'l Ass'n*, 51 Fla. L. Weekly D1719 (Fla. 2d DCA Aug. 21, 2026) (recognizing the broad range of sanctions available to courts to address AI hallucinations).

Affirmed.

ROTHSTEIN-YOUAKIM, SMITH, and GUARD, JJ., Concur.

Opinion subject to revision prior to official publication.