

**SUPPLEMENT TO STATEMENT OF COMPLAINT — ATTACHMENT TO JD-
GC-6**

**REFERENCING ORIGINAL COMPLAINT AR-GRV-20260427-
SGB_BLOMBERG_MILLER**

Complainant: Abraham Rosenwald, Pro Se 1127 High Ridge Road, Suite 151 Stamford, CT 06905 (203) 391-1041 aberosenwald@icloud.com

Respondents: - Jill Heitler Blomberg, Esq. (lead counsel for Plaintiff) - Molly C. Miller, Esq. (junior partner) - Laura L. Battey, Esq. (associate)

All of: Schoonmaker, George, Blomberg, Bryniczka & Welsh, P.C. (“SGB”) 1700 East Putnam Avenue, Suite 206 Old Greenwich, CT 06870

Underlying matter: *Rosenwald v. Rosenwald*, FST-FA26-6078292-S (dissolution); FST-FA26-5033652-S (restraining order, post-judgment).

Date: May 24, 2026

Doc ID: AR-GRV-20260524-SUPPLEMENT_BLOMBERG_MILLER

Cross-reference: This Supplement is filed pursuant to Connecticut Practice Book § 2-32(a) as an addition to Complainant’s principal Statement of Complaint (Doc ID: AR-GRV-20260427-SGB), originally filed under JD-GC-6 cover. The original complaint identified thirty-eight (38) discrete violations and remains the operative principal Statement. This Supplement adds six (6) new counts arising from public-record findings developed between April 28 and May 24, 2026, and identifies one (1) clarification of party-status (Palmer-as-paralegal) bearing on Counts 35 and others. The Supplement does not withdraw or amend any prior count.

I. PROCEDURAL POSTURE OF THIS SUPPLEMENT

1. The Statewide Grievance Committee’s jurisdiction over the principal Complaint is established at ¶¶ 4-5 of AR-GRV-20260427-SGB and not repeated here. Connecticut Practice Book § 2-32(a) provides for supplementation of a pending grievance with newly-

discovered evidence and additional rule-violation counts. Section 2-32(j) reserves to the Statewide Grievance Committee the authority to take new evidence at any stage of the proceeding prior to final disposition. This Supplement is offered on those bases.

2. The new findings below were not available to the Complainant on April 27, 2026 because the underlying public-record research products from which they are derived were produced between May 14 and May 24, 2026, principally:

1. HEITLER_FAMILY_LINEAGE_AND_SOROS_TIES_20260524.md — Heitler / Klein NY trial-court bench dynasty across three generations; documented NYCAL / Weitz & Luxenberg / Silver-machine pattern.
2. CLASS_ACTION_CANDIDATES_Diana_SGB_20260524.md — cross-referencing the GAL-appointment record on Diana-managed dockets against SGB partner roster.
3. BOMDEMATTIE_SGB_29_DOCKET_DEEP_DIVE_20260524.md — 29-docket SGB-vs-BOMDeMattie dataset establishing the bench-disposition cohort.
4. SGB_ASSOCIATES_FODOR_PALMER_20260524.md — clarifying (i) the C.G.S. § 51-85 oath-administration basis for Attorney Fodor’s signature on the Plaintiff’s May 6, 2026 Financial Affidavit, and (ii) Rachel Palmer’s status as a paralegal (not an attorney).

3. The original Respondents are continued, and the same RPC rules apply, but for the new counts below, the Complainant also identifies Attorney **Aidan R. Welsh**, Attorney **Peter M. Bryniczka**, and Attorney **Natassia M. Fodor** as additional SGB attorneys whose conduct or supervisory failure bears on the new counts. The Complainant has filed separate Statements of Complaint against Welsh (AR-GRV-20260524-WELSH_GAL_PATTERN), Bryniczka (AR-GRV-20260524-BRYNICZKA), and Fodor (AR-GRV-20260524-FODOR_DUAL_ROLE) so as not to conflate the present Respondents with the additional ones. This Supplement asserts only that the originally-named Respondents’ conduct is, as to the new counts below, inseparable from the firm’s institutional posture.

II. NEW COUNTS

COUNT 39 — Rule 1.7 / Rule 1.10 / Rule 3.3(d) — Structural conflict from undisclosed Welsh dual role as Diana-CLE introducer and Diana-appointed GAL

1. The principal Respondents (Blomberg and Miller) have appeared continuously before Hon. Leo V. Diana on the dissolution docket and on related scheduling. The Court’s March 19, 2026 Scheduling Order (Entry 136.00, FST-FA26-6078292-S) was signed by Diana, J. On the documented record, Diana, J. is the lead author of the Statewide Family Time Management Order (effective 1/1/2025) and of Connecticut Practice Book §§ 25-34A and 25-50A; he is the same judge who personally presented at Connecticut Bar Association CLE program EWL220329 (“Jennifer’s Law,” March 29, 2022) on the segment “What is a judge looking for during a TRO hearing and/or trial.”
2. The introductory faculty at EWL220329 included **Attorney Aidan R. Welsh** of SGB — a partner of the present Respondents, then the Connecticut Bar Association’s Assistant Treasurer-Secretary and a Family Law Section officer. Welsh personally introduced Diana, J. on the EWL220329 panel.
3. Per public Connecticut Judicial Branch records cross-referenced against the Diana docket-action log (covering Sept 2023 – present, per 08_DIANA_DEEP_DIVE.md), Welsh has also served as court-appointed Guardian Ad Litem on at least two Diana-managed dockets: **FST-FA17-6031564-S** and **FST-FA22-5026729**. The Section officer who introduces Diana, J. at a flagship CLE is the same lawyer Diana, J. has appointed as GAL on his own docket. This pattern is set forth in detail in the contemporaneously-filed Statement of Complaint against Welsh (Doc ID: AR-GRV-20260524-WELSH_GAL_PATTERN), incorporated by reference.
4. On the documented record, neither Blomberg nor Miller disclosed to Diana, J., to the Defendant, or to the Court the Welsh-as-Diana-GAL pattern at the time of, or after, Diana, J.’s entry of the Scheduling Order on March 19, 2026. The pattern is material to a Connecticut Code of Judicial Conduct Canon 2.11(B)(2) disclosure inquiry. Rule 3.3(d) (“In an ex parte proceeding, a lawyer shall inform the tribunal of all material facts known to the lawyer that will enable the tribunal to make an informed decision”) and Rule 3.3(a) (1) (no false or misleading statements of fact) impose on the Respondents an affirmative obligation to surface that pattern when proceeding in cases assigned to a judge whose docket presents the same enmeshment. Connecticut Rule of Professional Conduct 1.7(a) precludes representation where a “significant risk that the representation ... will be

materially limited by ... a personal interest of the lawyer” exists. Connecticut Rule 1.10(a) imputes any partner-level conflict to the entire firm. Welsh’s GAL role on Diana’s docket, when combined with his Section-officer role introducing Diana, J. at CLE, creates exactly the personal interest Rule 1.7(a) is meant to govern. The Respondents’ continued participation, without disclosure or screening, violates Rules 1.7, 1.10, and 3.3(d).

Rule 1.7; Rule 1.10; Rule 3.3(d); Rule 3.3(a)(1). *Documented in CLASS_ACTION_CANDIDATES_Diana_SGB_20260524.md; cross-referenced in 08_DIANA_DEEP_DIVE.md and Open Letter v2 § II.E.1.*

COUNT 40 — Rule 3.3(a)(1) / Rule 8.4(c) / Rule 8.4(d) — Heitler-family three-generation NY judicial dynasty and the NYCAL comparator: undisclosed material context

1. Attorney Blomberg is a third-generation descendant of a New York State trial-court bench dynasty. Her mother, **Hon. Sherry Klein Heitler** (NY State Supreme Court, 1st Judicial District, 1994-2020), served as Coordinating Justice of the New York City Asbestos Litigation (“NYCAL”) docket from August 2008 through March 2015. Her grandfather, **Hon. Alvin F. Klein** (NY State Supreme Court, 1st Judicial District, 1972-2004; deceased 2005), received a 1982 Determination of Admonition from the NYS Commission on Judicial Conduct.
2. During Justice Heitler’s NYCAL tenure, plaintiff’s firm Weitz & Luxenberg captured 87% of mesothelioma verdict dollars on the docket. In April 2014, Justice Heitler reversed a 20-year ban on punitive damages in NYCAL — an order filed by Weitz & Luxenberg. In March 2015, Justice Heitler was removed as NYCAL Coordinating Justice amid documented criticism that the docket had been “rigged” for the favored firm. NY Assembly Speaker Sheldon Silver was indicted January 2015 and twice-convicted (2015 and 2018 retrial) for a \$3.2 million kickback scheme involving Weitz & Luxenberg. Justice Heitler was not criminally charged. The lineage is publicly verified through Fordham Law News (October 30, 2023), Historical Society of the New York Courts, JAMS NY profile pages, the NYS Commission on Judicial Conduct 1982 Annual Report, and contemporaneous Legal Newslines, Washington Examiner, and American Tort Reform Association reporting.
3. The Complainant does not claim the Heitler / NYCAL story is itself a violation of the Connecticut Rules of Professional Conduct, nor does the Complainant claim that lineage alone disqualifies counsel. The Complainant alleges instead that the lineage is **material context** to the institutional posture Blomberg has occupied in this matter — specifically, the documented bench-bar enmeshment with Diana, J. and Cooper, J., and the Welsh-as-

GAL pattern in Count 39 above. On the documented record, Blomberg has not disclosed the lineage to the tribunal in connection with any Canon 2.11 disclosure colloquy, nor has she addressed in any pleading the analogical comparator the NYCAL pattern presents. Where the contested issue before the tribunal includes the structural-capture pattern the Defendant has documented (see Complainant’s Open Letter v2 §§ II.A-II.E.4), counsel’s withholding of a comparator that is on the public record in her own family’s institutional history is a Rule 3.3(a)(1) “false or misleading statement of material fact” by omission. The omission is reinforced by Rule 8.4(c) (conduct involving “dishonesty, fraud, deceit, or misrepresentation”) and Rule 8.4(d) (conduct “prejudicial to the administration of justice”).

4. The Complainant notes that on the documented record, no Soros / OSF / Drug Policy Alliance funding tie to any Heitler-family judge has been identified (see HEITLER_FAMILY_LINEAGE_AND_SOROS_TIES_20260524.md §§ 3.1-3.4). The Complainant therefore does not raise that subject here. The political-money pattern relevant to this count is the Manhattan Democratic Party / Silver-machine / Weitz & Luxenberg pattern, and it is raised because it is on the public record and is materially analogous to the structural pattern the Defendant has documented in Connecticut.

Rule 3.3(a)(1); Rule 8.4(c); Rule 8.4(d). Documented in HEITLER_FAMILY_LINEAGE_AND_SOROS_TIES_20260524.md; further context in Open Letter v2 § II.E.2.

COUNT 41 — Rule 3.3(a)(1) / Rule 1.10 — Schoonmaker IV Day, Berry & Howard pedigree and undisclosed firm-pedigree overlap with Hon. Thomas Joseph O’Neill

1. SGB founding-line partner **Samuel V. Schoonmaker IV** — current Chair of the Connecticut Bar Association Family Law Section, and former SGB partner (1996-2007) — began his legal career as a litigation associate at **Day, Berry & Howard** (1992-1994). Day, Berry & Howard merged into Day Pitney in 2007.
2. **Hon. Thomas Joseph O’Neill**, Connecticut Superior Court judge in the Fairfield Judicial District (Bridgeport), and a judge whose docket has touched the Defendant’s matters, entered Day Pitney as a partner on January 4, 2014. The shared Day Pitney / Day, Berry & Howard pedigree between O’Neill, J., and Schoonmaker IV is a public-record matter.
3. On February 17, 2026 — while *Rosenwald v. Rosenwald* was actively pending — O’Neill, J., disposed of *Wharton v. Wharton* (FST-FA26-6078190-S) in 36 days from filing. *Wharton* was an SGB-versus-Broder Orland Murray DeMattie (“BOMDeMattie”)

uncontested dissolution. Schoonmaker IV is “Of Counsel” to BOMDeMattie. The contemporaneity, the firm-versus-firm posture, and the shared pre-bench pedigree between O’Neill and Schoonmaker IV are all on the public record (per BOMDEMATTIE_SGB_29_DOCKET_DEEP_DIVE_20260524.md § 3.6, and Open Letter v2 § II.E.3). The full 29-docket SGB-vs-BOMDeMattie inventory is detailed in Count 42 below.

4. On the documented record, none of the present Respondents has disclosed the Schoonmaker IV / Day Pitney / O’Neill pedigree to the tribunal in connection with any Canon 2.11 disclosure colloquy on the Defendant’s dockets. The pedigree is one element of the broader bench-bar structural-disclosure question that Connecticut Code of Judicial Conduct Canon 2.11(B)(2) reaches. The Respondents’ continued silence, after the disclosure question became material on the *Wharton* timeline, is a Rule 3.3(a)(1) failure (false or misleading statement of material fact by omission to the tribunal) and a Rule 1.10 firm-imputation problem (the partner-level information is imputable to all SGB attorneys). The Complainant has filed a separate Statement of Complaint against Schoonmaker IV (Doc ID: AR-GRV-20260524-SCHOONMAKER_IV), incorporated by reference, which addresses the underlying duty he owes as Section Chair to model the disclosure he has not made.

Rule 3.3(a)(1); Rule 1.10. Documented in BOMDEMATTIE_SGB_29_DOCKET_DEEP_DIVE_20260524.md §§ 2.1, 3.6; Open Letter v2 § II.E.3; companion grievance AR-GRV-20260524-SCHOONMAKER_IV.

COUNT 42 — Rule 3.3(a)(1) / Rule 3.3(d) — The 29-docket SGB-vs-BOMDeMattie bench-disposition cohort: undisclosed structural pattern

1. The merged Stamford-SGB dataset compiled by the Complainant (/Users/icloudabe/Downloads/MERGED_STAMFORD_SGB_DATASET/MERGED_case_metadata.csv + MERGED_parties.csv) identifies 29 dockets in which SGB and BOMDeMattie appear on opposite sides between 2009 and 2026. Of those 29 dockets:
 1. Hon. Stanley Novack disposed of 5 (Williams, Zins, Hicks, Davidson, Hurst, all 2017-2023).
 2. Hon. Heidi Winslow disposed of 2 (Vecchio, Conroy).
 3. Hon. Stephanie McLaughlin disposed of 2 (Sullivan, Stella).
 4. **Hon. Ronald Kowalski** disposed of 2 (McKee, Walker) — Kowalski, J., is a judge on the Defendant’s matters.

5. **Hon. Thomas O’Neill** disposed of 2 (Seibold/Weinstein, *Wharton*) — O’Neill, J., is a judge on the Defendant’s matters; *Wharton* is the contemporaneous 36-day disposition described in Count 41.

6. Hon. Jane Emons (1), Hon. Margarita Hartley Moore (1), Hon. Donna Heller (1), **Hon. Vikki Cooper** (1, Barone), Hon. Michael Dagostino (1) — Cooper, J., is a judge on the Defendant’s matters.

7. 11 are still pending as of 5/24/2026.

2. Of the 8 sitting Connecticut Superior Court judges who have touched the Defendant’s matters, **three** (O’Neill, Kowalski, Cooper) have prior SGB-vs-BOMDeMattie disposition experience. On the documented record, none of the present Respondents has disclosed that experience to those judges in any Canon 2.11 disclosure colloquy on the Defendant’s dockets. Rule 3.3(d) requires affirmative disclosure of material facts to the tribunal at ex parte and disposition stages; Rule 3.3(a)(1) precludes false or misleading statements of material fact, including by omission. The 29-docket cohort — particularly the three judges whose disposition history overlaps the Defendant’s bench — is material to the Defendant’s pending Canon 2.11(B)(2) disclosure motions and to the tribunal’s evaluation of the structural-capture pattern the Defendant has put before it. The omission is sustained, deliberate, and material.

Rule 3.3(a)(1); Rule 3.3(d). Documented in *BOMDEMATTIE_SGB_29_DOCKET_DEEP_DIVE_20260524.md* §§ 1.1-1.30; cross-reference at *Open Letter v2 § II.E.3*.

COUNT 43 — Rule 3.7 / Rule 1.7 / Rule 5.3 — The Fodor § 51-85 oath-administration dual role

1. On May 6, 2026, the Plaintiff signed and swore his Financial Affidavit (Practice Book § 25-30 disclosure) in the underlying dissolution matter. The Affidavit is the principal financial document in the case and the basis of the Defendant’s pending Notice of Misrepresentations (AR-NOT-20260508-678d) and Motion to Strike (AR-MOT-20260508-601d).

2. The oath on that Affidavit was administered by **Attorney Natassia M. Fodor**, an associate at SGB. Under **Connecticut General Statutes § 51-85**, every active Connecticut attorney in good standing is *ex officio* a Commissioner of the Superior Court with authority to administer oaths under § 51-87 and take acknowledgments under § 1-29. Attorney Fodor’s

authority to administer the Plaintiff's oath derives from her status as a Connecticut-admitted attorney — which is the **same status** that makes her a member of the firm representing the Plaintiff (Per SGB_ASSOCIATES_FODOR_PALMER_20260524.md §§ 47-58).

3. The dual-role configuration is structurally problematic under three rules:

1. **Rule 3.7 (Lawyer as Witness)** is implicated. A lawyer shall not act as advocate at a trial in which the lawyer is likely to be a necessary witness, except in three narrow exceptions none of which is present here. Where the Plaintiff's Affidavit contains material misrepresentations (as the Defendant has documented in the contemporaneously-filed Notice of Misrepresentations), Attorney Fodor as oath-administering officer is a necessary witness on (i) the in-person colloquy at the oath, (ii) the chain of custody of supporting documents shown to the affiant, and (iii) the scope of her § 53a-157b warning to the affiant before administration. The SGB firm's continued representation in the matter where one of its associates is the oath-administering witness on a sworn document under active impeachment is a Rule 3.7 candidate.

2. **Rule 1.7 (Concurrent Conflict of Interest)** is implicated. Attorney Fodor's role as oath-administrator requires impartiality. Her role as counsel-of-record is by definition partisan. The "significant risk that the representation ... will be materially limited by ... a personal interest of the lawyer" exists, because Attorney Fodor cannot simultaneously certify the truthfulness of an oath she administered while also advocating for the affiant whose oath is challenged.

3. **Rule 5.3 (Responsibilities Regarding Nonlawyer Assistance)** is implicated derivatively because the in-firm practice of an associate administering an oath to her own firm's client — without a documented firm protocol for reassigning that role to a non-firm Commissioner — is a supervisory failure of the principal Respondents (Blomberg as lead counsel and Miller as junior partner) to ensure firm-wide compliance.

4. The cure is trivial: reassign the oath administration to a non-SGB Commissioner of the Superior Court (every CT attorney qualifies; no separate notary commission is needed). The firm has not done so. The Complainant has preserved this concern in prior Rule 408 correspondence (AR-LTR-20260507-2218) and surfaced it in Open Letter v2 § II.E.4 (May 23, 2026). The Respondents have made no substantive response. The Complainant has also filed a separate Statement of Complaint against Attorney Fodor (Doc ID: AR-GRV-20260524-FODOR_DUAL_ROLE), incorporated by reference.

Rule 3.7; Rule 1.7; Rule 5.3. Documented in *SGB_ASSOCIATES_FODOR_PALMER_20260524.md* §§ 47-83; *Open Letter v2 § II.E.4; companion grievance AR-GRV-20260524-FODOR_DUAL_ROLE.*

COUNT 44 — Rule 5.3 — Palmer-as-paralegal misrepresentation in case correspondence and supervisory failure

1. Throughout the proceedings, “Palmer” (i.e., **Rachel Palmer** at rpalmer@sgbfamilylaw.com) has appeared on substantive case correspondence, distribution lists, and the cc-list of court-related communications alongside Attorneys Blomberg, Miller, Battey, and Fodor. The Complainant’s pre-grievance correspondence and prior filings (including AR-NOT-20260508-678d and AR-IMPCH-20260508-dca2) treated “Palmer” as if she were an attorney. The Respondents had every opportunity in the cumulative correspondence record to clarify her status and did not do so.
2. Independent public-record research (per *SGB_ASSOCIATES_FODOR_PALMER_20260524.md* § Target 2) establishes that **Rachel Palmer is a paralegal at SGB, not an attorney.** She has no Connecticut juris number, is not listed on the SGB attorney directory, and is identified as a paralegal on ZoomInfo’s SGB employee organizational chart alongside other paralegals (Linda Chmura) and legal assistants (Michael Caporaso). SGB client testimonials confirm her role as the intake / client-liaison person who “connected” callers to firm attorneys.
3. **Rule 5.3 (Responsibilities Regarding Nonlawyer Assistance)** imposes on a partner and on any lawyer who has direct supervisory authority over a nonlawyer the obligation to ensure that the nonlawyer’s conduct is compatible with the professional obligations of the lawyer. Where a nonlawyer is routinely included on substantive case correspondence distribution lists in a manner that creates a reasonable misimpression of attorney status to a pro se opposing party, Rule 5.3(a) and 5.3(b) impose on supervising counsel an affirmative duty either (i) to make clear in correspondence that the nonlawyer is acting in a paralegal capacity, or (ii) to remove the nonlawyer from distribution where her inclusion creates a misimpression. The Respondents have done neither.
4. The Complainant raises this count for the limited purpose of correcting the record and identifying the Rule 5.3 supervisory question. The Complainant does not allege Palmer engaged in unauthorized practice of law; the Complainant alleges that the Respondents’ failure to clarify her status (notwithstanding three months of opportunity in pre-grievance correspondence) is a Rule 5.3 supervisory failure imputable to the firm. The constructive-

notice analysis on which the Defendant has relied in other filings (paralegal receipt of an email still imputes notice to the firm under agency principles and Rule 5.3) is not weakened by the clarification; it is sharpened. The companion grievance against Attorney Bryniczka (Doc ID: AR-GRV-20260524-BRYNICZKA) addresses the partner-level Rule 5.3 supervisory question separately.

Rule 5.3. Documented in *SGB_ASSOCIATES_FODOR_PALMER_20260524.md* § Target 2; companion grievance AR-GRV-20260524-BRYNICZKA.

COUNT 45 — Rule 7.1 (Communications Concerning Lawyer Services) / Rule 8.4(d) (Conduct Prejudicial to the Administration of Justice) — Firm-promulgated public marketing video representing the firm’s bench-relationships as producing “best possible outcome”

1. On the documented record, on or before May 13, 2026, the SGB firm caused to be published — under its firm trade name “Schoonmaker George Premier Family Law Firm in Connecticut” — a public-facing marketing/teaser video of approximately four minutes’ duration (filename of the publicly-distributed master copy in the Complainant’s possession: `Welcome-to-Schoonmaker-George-Premier-Family-Law-Firm-in-Connecticut-1.mp4`). The video features multiple firm voices and is patterned as a firm-culture promotional piece directed to prospective clients. The full verbatim transcript is preserved at Doc ID **AR-EVIDENCE-20260524-SGB-MARKETING-VIDEO** and is incorporated herein by reference.
2. At timestamp **00:02:24.340 – 00:02:40.440** of the video, a firm representative — on contextual best-effort identification, Attorney **Aidan R. Welsh** (the same SGB partner who is the subject of the companion complaint AR-GRV-20260524-WELSH_GAL_PATTERN and whose institutional voice in firm-marketing material is documented) — states verbatim:

“Whether it is financial experts, forensic accountants, business evaluators, therapists, mediators, **the judges**. Those relationships that we form mean that we are well-respected, we are trusted, and therefore give our clients the best possible outcome in their case.”

(Emphasis added to “the judges” to isolate the bench-bar element.) Final voice-identification confirmation may be developed at hearing; the firm-level approval of the marketing communication does not depend on which individual partner delivered the line.

1. **Connecticut Rule of Professional Conduct 7.1** provides:

“A lawyer shall not make a false or misleading communication about the lawyer or the lawyer’s services. A communication is false or misleading if it ... is likely to create an unjustified expectation about results the lawyer can achieve, or states or implies that the lawyer can achieve results by means that violate the Rules of Professional Conduct or other law.”

The operative quote expressly conditions “the best possible outcome” on the firm’s “relationships” with “the judges.” That representation is — on its face — a Rule 7.1 violation in two distinct respects: (a) it creates the unjustified expectation that the firm’s bench-relationships, rather than the merits, produce results; and (b) it implies that the firm achieves results “by means that violate” Connecticut Rule of Professional Conduct 3.5 (Impartiality of Tribunal) and the Connecticut Code of Judicial Conduct Canon 2.4 (external influences on judicial conduct).

1. **Rule 8.4(d)** is independently violated. The firm’s public statement — that its relationships with the judiciary are a competitive strength which produces “best possible outcome” — is “conduct that is prejudicial to the administration of justice” because it (a) cumulatively erodes public confidence in the impartiality of the courts before which the firm appears, (b) advertises to prospective clients that the firm’s market-position rests on relational rather than merit-based factors, and (c) creates a structural cloud over every judicial action taken by every Connecticut judge whose courtroom is the “relationship” being marketed. The respondents, as the lead counsel and junior partner appearing day-to-day in the Defendant’s matter, are imputable to the firm-level marketing approval under Rule 1.10(a) and bear direct responsibility for the marketing communications of the firm in which they are partners or associates.

2. The Complainant respectfully notes the corroborating force of this evidence on every prior Count of this Supplement and of the principal complaint. The operative marketing-video quote is the firm’s own public articulation — in its own marketing material, in its own voice, for its own commercial purposes — of the structural-capture pattern that the Defendant has independently documented in Open Letter v2 (May 23, 2026) and in the companion JRC complaint (AR-JRC-20260524-DIANA_COOPER_ONEILL_KOWALSKI). The firm has, in plain text, ratified the framing the Complainant has alleged.

Rule 7.1; Rule 8.4(d); Rule 1.10(a) (imputation). Documented in Doc ID AR-EVIDENCE-20260524-SGB-MARKETING-VIDEO at § II (operative quote with timestamp); cross-referenced in companion complaints AR-GRV-20260524-WELSH_GAL_PATTERN (Welsh attribution), AR-GRV-20260524-SCHOONMAKER_IV (Section Chair institutional architecture), AR-GRV-20260524-BRYNICZKA (partner-level Rule 5.1 supervisory responsibility for marketing approval), and AR-JRC-20260524-DIANA_COOPER_ONEILL_KOWALSKI (Canon 2.11(B)(2) bench-side disclosure obligation).

III. EVIDENTIARY POSTURE OF THE NEW COUNTS

1. The seven new counts above do not depend on transcript impeachment. They rest on three categories of public-record evidence (with the additional video-evidence category for Count 45):
 1. **Court records** — the Diana Scheduling Order (Entry 136.00, March 19, 2026); the EWL220329 CLE faculty agenda (public on ctbar.org); the 29-docket SGB-vs-BOMDeMattie merged dataset (sourced to JIS public dockets); the Plaintiff’s May 6, 2026 Financial Affidavit (filed of record); the CT Judicial Branch attorney/firm inquiry portal output for SGB attorneys and Palmer.
 2. **Bar / professional directories and bios** — the SGB official attorney directory (sgbfamilylaw.com); the CBA Family Law Section officer roster; the BOMDeMattie firm bio for Schoonmaker IV; the AAML / IAML fellow rosters; the Fordham Law News profile of Heitler / Blomberg.
 3. **Judicial-conduct / political-money public records** — the NYS Commission on Judicial Conduct 1982 Annual Report (Klein admonition); the contemporaneous Sherri Klein Heitler NYCAL coverage in Legal Newline, Washington Examiner, and the American Tort Reform Association “Judicial Hellholes” reports.
 4. **Firm-promulgated public marketing materials** — Doc ID AR-EVIDENCE-20260524-SGB-MARKETING-VIDEO (the verbatim Whisper transcript of the SGB teaser video, with operative-quote timestamp), preserved with chain-of-custody and available on reasonable written request.
2. Each item is publicly accessible. Where the Complainant has hedged a factual claim, the hedge (“On the documented record”; “Per public filings”; “on contextual best-effort identification”) accurately reports the epistemic limit. No claim in this Supplement depends on private or sealed records.

IV. PATTERN OF NON-RESPONSE — CONTINUED

1. The Complainant served Open Letter v2 (Doc ID: AR-OPENLTR-20260523-sgbe-msl) on the Respondents and the larger SGB roster on May 23, 2026. Section II of the Open Letter directly identified the six findings described in Counts 39 through 43 above (with the exception of Count 44, which is a procedural clarification rather than a substantive new finding, and Count 45, which arises from a video that — though publicly distributed by the firm — was not in the Complainant’s possession in transcribed form until May 24, 2026). The Respondents have made no substantive response. The pattern of non-response described at ¶¶ 19-22 of the principal complaint is continued and reinforced.
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V. RELIEF REQUESTED IN THIS SUPPLEMENT

1. In addition to the relief requested at ¶ 23 of the principal complaint, the Complainant requests that the Statewide Grievance Committee:
 1. **Find probable cause** as to Counts 39 through 45, and consolidate them with the principal complaint for investigation and hearing.
 2. **Order disclosure** to the underlying tribunal — by way of a corrective filing or, in the alternative, an order on the SGB firm — of (i) the Welsh-as-Diana-GAL pattern documented in Count 39; (ii) the Schoonmaker IV / Day Pitney / O’Neill pedigree overlap documented in Count 41; (iii) the 29-docket SGB-vs-BOMDeMattie disposition history documented in Count 42; (iv) the Fodor § 51-85 oath-administration dual role documented in Count 43; and (v) the existence, content, and firm-approval status of the SGB marketing video documented in Count 45.
 3. **Order reassignment** of any future oath administration on the Plaintiff’s sworn filings to a non-SGB Commissioner of the Superior Court.
 4. **Order clarification** of Palmer’s paralegal status in all SGB outgoing case correspondence so that no pro se opposing party is led to believe she is an attorney.
 5. **Order the SGB firm to take down, or to materially modify** the marketing-video communication identified in Count 45, and to lodge a Rule 7.1 compliance certification with the Statewide Grievance Committee identifying which firm partners reviewed and approved the marketing content.
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VI. VERIFICATION

Pursuant to Connecticut Practice Book § 2-32(a) and the JD-GC-6 attestation block, I, Abraham Rosenwald, hereby state under penalties of false statement that the foregoing Supplement to Statement of Complaint is true and accurate to the best of my knowledge and belief, and that the conduct described herein occurred substantially as described.

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Date: _____

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