

COMPLAINT TO THE STATEWIDE GRIEVANCE COMMITTEE

STATEMENT OF COMPLAINT — ATTACHMENT TO JD-GC-6

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

Respondent: Peter M. Bryniczka, Esq. Partner, Schoonmaker, George, Blomberg, Bryniczka & Welsh, P.C. (“SGB”) 1700 East Putnam Avenue, Suite 206 Old Greenwich, CT 06870 Past President of the Greenwich Bar Association

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-BRYNICZKA

I. INTRODUCTION

1. The Complainant, Abraham Rosenwald, is the pro se Defendant in a Connecticut dissolution action pending in the Stamford Judicial District. The Respondent, Attorney Peter M. Bryniczka, is a named partner at SGB and Past President of the Greenwich Bar Association. The Respondent has not personally appeared as counsel in the Defendant’s underlying matters. The conduct grieved here is partner-level supervisory failure under Connecticut Rule of Professional Conduct 5.1 (Responsibilities of Partners, Managers and Supervisory Lawyers) and Rule 5.3 (Responsibilities Regarding Nonlawyer Assistance), arising from the pattern of conduct documented in the four companion complaints contemporaneously filed against:

1. Attorneys Jill Heitler Blomberg, Molly C. Miller, and Laura L. Battey (principal complaint AR-GRV-20260427-SGB-BLOMBERG_MILLER and Supplement AR-GRV-20260524-SUPPLEMENT_BLOMBERG_MILLER) — thirty-eight (38) original violations plus six (6) supplemental counts;
2. Attorney Aidan R. Welsh (AR-GRV-20260524-WELSH_GAL_PATTERN) — four (4) counts arising from the Welsh-as-Diana-GAL pattern;

3. Attorney Samuel V. Schoonmaker IV (AR-GRV-20260524-SCHOONMAKER_IV) — three (3) counts arising from the Day Pitney / Day, Berry & Howard pedigree disclosure failure and Section Chair role;
 4. Attorney Natassia M. Fodor (AR-GRV-20260524-FODOR_DUAL_ROLE) — three (3) counts arising from the § 51-85 oath-administration dual role on the May 6, 2026 Financial Affidavit.
2. The Respondent’s responsibility is institutional. As a named partner at SGB, the Respondent is a “lawyer in a law firm” subject to Rule 5.1(a) and (b), with the affirmative duty to ensure that the firm has “measures giving reasonable assurance that all lawyers in the firm conform to the Rules of Professional Conduct.” As supervising counsel to non-attorney staff (paralegal Rachel Palmer), the Respondent additionally has Rule 5.3(a)/(b) obligations. As Past President of the Greenwich Bar Association, the Respondent has a heightened professional-standards expectation. The Respondent’s continued silence on the firm-wide pattern documented in the companion complaints — across the four months of the Defendant’s pre-grievance correspondence and one month of the Defendant’s grievance filings — is the partner-level supervisory failure grieved here.
 3. The Complainant emphasizes that this partner-level complaint is the standard charging path where individual attorney conduct presents institutional sponsorship questions. The Complainant does not allege the Respondent has personally committed the conduct grieved in the companion complaints. The Complainant alleges that the Respondent, as a partner with the supervisory authority Rule 5.1 contemplates, has failed to take reasonable measures to address the pattern.
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II. JURISDICTION AND PROCEDURAL HISTORY

1. The Statewide Grievance Committee has jurisdiction over this complaint under Connecticut Practice Book § 2-32(a) and the Connecticut Statewide Grievance Committee Rules of Procedure, Rule 1(F). The Respondent is admitted to the Connecticut Bar.
2. The Connecticut Rules of Professional Conduct govern, particularly Rules 5.1, 5.3, 7.1, and 8.4(a)/(d).
3. The Complainant has served the SGB firm — including the Respondent in his capacity as named partner — with the three pre-grievance letters identified at ¶ 6 of the principal complaint (AR-LTR-20260410-3301; AR-LTR-20260425-3303; AR-LTR-20260427-3307), the closure letter AR-LTR-20260427-3306, and Open Letter v2 (AR-

OPENLTR-20260523-sgbe-msl, May 23, 2026). The Respondent has made no substantive response in his individual capacity, and the firm has made no firm-level response disclosing or remediating any of the issues raised.

III. PARTIES

A. Complainant

1. **Abraham Rosenwald** — pro se Defendant in *Rosenwald v. Rosenwald*. Self-represented, unemployed, and homeless; resides at a rented mailbox address. Member of the class of pro se family-court litigants for whom Practice Book § 23-3 duty of solicitude was promulgated.

B. Respondent

1. **Peter M. Bryniczka, Esq.** — Per public-record sources (SGB attorney bio at sgbfamilylaw.com; Greenwich Bar Association published officer history; CT Bar Association member directory):
 1. **Named partner** at Schoonmaker, George, Blomberg, Bryniczka & Welsh, P.C. (one of the four current named partners on the firm name).
 2. **Past President**, Greenwich Bar Association.
 3. **Practice focus:** matrimonial and family law (per firm bio).
 4. **Bar admission:** Connecticut Bar (year to be confirmed via JIS lookup at filing).

Office address: 1700 East Putnam Avenue, Suite 206, Old Greenwich, CT 06870. Juris number: to be supplied at filing (publicly listed in CT Judicial Branch attorney directory).

C. Underlying SGB Personnel (referenced)

1. The conduct of the following SGB attorneys is documented in the companion complaints and is referenced here only to establish the pattern Rule 5.1 reaches:
 1. Jill Heitler Blomberg, Esq. — Lead counsel; principal complaint and Supplement.
 2. Molly C. Miller, Esq. — Junior partner; principal complaint and Supplement.
 3. Laura L. Battey, Esq. — Associate; principal complaint.
 4. Aidan R. Welsh, Esq. — Partner; Welsh GAL grievance.
 5. Samuel V. Schoonmaker IV, Esq. — Section Chair; Schoonmaker IV grievance.

6. Natassia M. Fodor, Esq. — Associate; Fodor dual-role grievance.

2. **Rachel Palmer** — Non-attorney SGB paralegal (per SGB_ASSOCIATES_FODOR_PALMER_20260524.md § Target 2 and SGB’s own attorney directory, which does not list her). Routinely on case correspondence cc-lists. Her Rule 5.3 supervisory profile is detailed in Count 2 below.

IV. STATEMENT OF FACTS

1. The Respondent is a named partner — one of four — at SGB. The firm name itself (Schoonmaker, George, Blomberg, Bryniczka & Welsh) places the Respondent in the senior governance group of the firm. The firm bio describes him as a partner with matrimonial-law practice focus. The Greenwich Bar Association past presidency is a public-facing professional-standards credential — the Greenwich Bar’s Past Presidents are, by tradition and bar-governance practice, the institutional voice of the Greenwich legal community.
2. The companion complaints filed contemporaneously with this complaint identify the following patterns of conduct at SGB:
 1. **Thirty-eight (38) violations** in the principal complaint (Rule 3.3 candor violations, Rule 4.3 unrepresented-person violations, Rule 4.4 burden-without-purpose violations, Rule 3.4 fairness violations, Rule 8.4 misconduct, and Practice Book § 23-3 pro se duty-of-solicitude violations) — by Blomberg, Miller, and Battey.
 2. **Six (6) supplemental violations** in the Supplement: Rule 1.7 / 1.10 / 3.3(d) on the Welsh-as-Diana-GAL pattern; Rule 3.3(a)(1) / 8.4(c)/(d) on the Heitler-family Klein/ NYCAL pedigree and undisclosed comparator context; Rule 3.3(a)(1) / 1.10 on the Schoonmaker IV / Day Pitney / O’Neill pedigree; Rule 3.3(a)(1) / 3.3(d) on the 29-docket SGB-vs-BOMDeMattie cohort; Rule 3.7 / 1.7 / 5.3 on the Fodor § 51-85 oath-administration dual role; Rule 5.3 on the Palmer-paralegal-misrepresentation issue.
 3. **Four (4) violations** in the Welsh grievance (Rules 1.7, 1.10, 3.5, 8.4).
 4. **Three (3) violations** in the Schoonmaker IV grievance (Rules 1.7, 3.3, 8.4).
 5. **Three (3) violations** in the Fodor grievance (Rules 3.7, 1.7, 5.5(b)).

3. The pattern is not isolated. It is firm-wide. It spans multiple lawyers across multiple seniority levels (named partner; partner; junior partner; associate). It spans multiple categories of conduct (tribunal candor; unrepresented-person dealings; conflict disclosure; oath-administration; nonlawyer-staff supervision). It spans multiple subject-matter areas (the dissolution; the restraining-order matter; the financial affidavit; the discovery posture).
 4. The Defendant has, since April 10, 2026, served the SGB firm — including the Respondent — with three formal pre-grievance letters identifying the violations, cumulatively offering thirty (30) days of response time. The Respondent has not responded individually, and the firm has not responded institutionally. The pattern of complete non-response is itself charged as Violation 38 in the principal complaint. The pattern persisted through the contemporaneous service of Open Letter v2 on May 23, 2026, which surfaced four additional finding areas (Welsh GAL pattern; Schoonmaker IV pedigree; Heitler lineage; Fodor dual role) — none of which has received a substantive response in the day before filing of this complaint.
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V. THE FOUR COUNTS OF MISCONDUCT

COUNT 1 — Rule 5.1 (Responsibilities of Partners, Managers, and Supervisory Lawyers)

1. Connecticut Rule of Professional Conduct 5.1 provides:

“(a) A partner in a law firm, and a lawyer who individually or together with other lawyers possesses comparable managerial authority in a law firm, shall make reasonable efforts to ensure that the firm has in effect measures giving reasonable assurance that all lawyers in the firm conform to the Rules of Professional Conduct. (b) A lawyer having direct supervisory authority over another lawyer shall make reasonable efforts to ensure that the other lawyer conforms to the Rules of Professional Conduct. (c) A lawyer shall be responsible for another lawyer’s violation of the Rules of Professional Conduct if: (1) The lawyer orders or, with knowledge of the specific conduct, ratifies the conduct involved; or (2) The lawyer is a partner or has comparable managerial authority in the law firm in

which the other lawyer practices, or has direct supervisory authority over the other lawyer, and knows of the conduct at a time when its consequences can be avoided or mitigated but fails to take reasonable remedial action.”

1. The Respondent’s status as named partner places him within Rule 5.1(a) and (c)(2). The pattern of conduct documented across the companion complaints — particularly the structural pattern of conflict-disclosure failure under Rules 1.7 / 1.10 / 3.3 — is precisely the kind of firm-wide compliance pattern Rule 5.1(a) reaches. The Respondent has had constructive (and, since the April 10, 2026 letter, actual) knowledge of the pattern for at least three months. The four-month *Wharton* Practice Book § 17-43 disclosure window (closing on or about June 17, 2026) remains open. The Respondent could take remedial action — by ordering corrective disclosure, by reassigning oath-administration responsibilities, by withdrawing inappropriate sanctions requests, by directing his partners to acknowledge prior representations — and has not done so.
2. Rule 5.1(c)(2)’s “fails to take reasonable remedial action” predicate is satisfied. The Respondent is a partner; he has comparable managerial authority; he has knowledge (through firm membership, through the cumulative correspondence record, through the principal complaint and now the Supplement); and the consequences can still be avoided or mitigated. The failure to take reasonable remedial action makes him “responsible for” the underlying violations under the rule’s plain terms.

Rule 5.1(a), (c)(2). *Documented in the companion complaints AR-GRV-20260427-SGB-BLOMBERG_MILLER, AR-GRV-20260524-SUPPLEMENT_BLOMBERG_MILLER, AR-GRV-20260524-WELSH_GAL_PATTERN, AR-GRV-20260524-SCHOONMAKER_IV, AR-GRV-20260524-FODOR_DUAL_ROLE.*

COUNT 2 — Rule 5.3 (Responsibilities Regarding Nonlawyer Assistance)

1. **Connecticut Rule of Professional Conduct 5.3** provides:

“With respect to a nonlawyer employed or retained by or associated with a lawyer: (a) A partner, and a lawyer who individually or together with other lawyers possesses comparable managerial authority in a law firm shall make reasonable efforts to ensure that the firm has in effect measures giving reasonable assurance that the person’s conduct is compatible with the professional obligations of the lawyer; (b) A lawyer having direct supervisory authority over the nonlawyer shall make reasonable efforts to ensure that the person’s conduct is

compatible with the professional obligations of the lawyer; and (c) A lawyer shall be responsible for conduct of such a person that would be a violation of the Rules of Professional Conduct if engaged in by a lawyer if: (1) The lawyer orders or, with the knowledge of the specific conduct, ratifies the conduct involved; or (2) The lawyer is a partner or has comparable managerial authority in the law firm in which the person is employed, or has direct supervisory authority over the person, and knows of the conduct at a time when its consequences can be avoided or mitigated but fails to take reasonable remedial action.”

1. **Rachel Palmer** is a paralegal at SGB (per *SGB_ASSOCIATES_FODOR_PALMER_20260524.md* § Target 2). She has been included on substantive case correspondence and cc-distribution lists in a manner that, as the Defendant’s prior filings reflect, created a reasonable impression upon a pro se opposing party that she might be a member of the firm’s attorney roster. The Respondent’s Rule 5.3(a) obligation is to “make reasonable efforts to ensure that the firm has in effect measures” so that the nonlawyer’s role is clearly delineated. The firm has not adopted any such measure (e.g., a signature-block notation identifying Palmer as a paralegal; an annotation on the cc-line identifying her non-attorney status).
2. The Rule 5.3(c)(2) predicate is satisfied: the Respondent is a partner; the firm has knowledge (the Defendant’s own filings have referenced Palmer for months); the consequences can still be avoided or mitigated by adopting clear-status notation in firm correspondence; the firm has not done so. The Respondent is “responsible for” the resulting confusion under the rule.
3. The Defendant is mindful that the Palmer-paralegal misrepresentation count is the narrower of the structural concerns raised in this complaint. It is offered here because Rule 5.3 is the partner-level frame that reaches the issue, and because correction of it is one of the simpler remedial actions the firm could undertake in response to the SGC’s order.

Rule 5.3(a), (c)(2). Documented in *SGB_ASSOCIATES_FODOR_PALMER_20260524.md* § Target 2; cross-reference at *AR-GRV-20260524-SUPPLEMENT_BLOMBERG_MILLER* Count 44.

COUNT 3 — Rule 8.4(a) (Misconduct — Inducing or Assisting Violations)

1. **Connecticut Rule of Professional Conduct 8.4** provides:

“It is professional misconduct for a lawyer to: (1) Violate or attempt to violate the Rules of Professional Conduct, knowingly assist or induce another to do so, or do so through the acts of another”

1. The Respondent’s partner-level role at SGB — in combination with his sustained silence after three months of cumulative pre-grievance correspondence identifying specific conduct, and his continued silence after the May 23, 2026 service of Open Letter v2 — constitutes knowing assistance or inducement under Rule 8.4(1). The “induce or assist” liability under 8.4(1) does not require proof of specific affirmative direction; the partner’s sustained acquiescence in conduct he has the authority and knowledge to remediate is itself inducement and assistance within the rule.
2. The cumulative pattern is the violation. The conduct of any one of the SGB associates and partners, considered in isolation, might not trigger 8.4(1) partner-level liability against the Respondent. But the pattern, considered firm-wide, does. Rule 5.1’s “reasonable measures” obligation is the standard against which the Respondent’s institutional response is measured, and the response has been silence.

Rule 8.4(1). *Documented across the companion complaints; pattern-of-non-response detailed at ¶¶ 19-22 of the principal complaint.*

COUNT 4 — Rule 5.1(a) / Rule 5.1(c)(2) — Partner-level institutional-supervisory responsibility for firm-promulgated marketing approval

1. On the documented record, the SGB firm — under its trade name “Schoonmaker George Premier Family Law Firm in Connecticut” — has caused to be publicly distributed a marketing/teaser video of approximately four minutes in duration. The full verbatim Whisper transcript is preserved at Doc ID **AR-EVIDENCE-20260524-SGB-MARKETING-VIDEO** and incorporated by reference. At timestamp **00:02:24.340 – 00:02:40.440**, a partner-level firm voice states:

“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.”

1. The marketing communication is a per-se **Rule 7.1** violation (creates unjustified expectation about results; implies achievement of results by means inconsistent with Rule 3.5 and Code of Judicial Conduct Canons 2.4 and 3.10) and a per-se **Rule 8.4(d)** violation

(conduct prejudicial to the administration of justice). The firm-level theories are set out in detail in the companion complaints AR-GRV-20260524-SUPPLEMENT_BLOMBERG_MILLER (Count 45), AR-GRV-20260524-WELSH_GAL_PATTERN (Counts 5–8), and AR-GRV-20260524-SCHOONMAKER_IV (Count 4). The Respondent’s partner-level exposure under Rule 5.1 is the subject of this Count.

2. **The marketing approval question is institutional, not individual.** A four-named-partner firm with continuous Section-officer presence at the Connecticut Bar Association does not publicly distribute a marketing video featuring partner-level voices and a firm-trade-name brand without partner-level review and approval. As one of the four named partners, the Respondent is among the small set of attorneys who must reasonably be presumed — absent firm-side evidence to the contrary — to have participated in, ratified, or had constructive knowledge of the marketing-content approval. Rule 5.1(a) and (c)(2) impose on the Respondent the duty to (a) ensure firm-wide measures giving reasonable assurance of Rule 7.1 conformance, and (b) take reasonable remedial action when he knows (or should know) of partner-level conduct whose consequences can be avoided or mitigated. The marketing-video communication is still publicly accessible; the consequences can still be mitigated by takedown or material modification.
3. **Past President of the Greenwich Bar Association — heightened institutional credibility expectation.** The Respondent’s past presidency of the Greenwich Bar Association is a public-facing institutional credential. The Greenwich Bar’s Past Presidents are, by tradition and bar-governance practice, the institutional voice of the Greenwich legal community. The Respondent’s institutional credibility — and through him, the credibility of the Greenwich Bar Association — is in tension with the firm’s public marketing of relational influence on the judiciary. Rule 5.1’s “reasonable measures” standard is sharper as applied to a Past President.
4. **Cumulative pattern reinforced.** The marketing-video admission, while it stands on its own as a Rule 7.1 / Rule 8.4(d) violation, also independently reinforces the Rule 5.1 partner-supervisory theory of Counts 1 and 3 above. The firm’s public marketing of the very bench-relationships that Counts 1 and 3 grieve as undisclosed structural conflicts is the firm’s own public ratification of the conflict the Complainant has alleged. The Respondent’s partner-level acquiescence in the marketing approval is the same institutional acquiescence that has yielded the firm-wide pattern documented across the companion complaints. The marketing communication, in plain English, articulates the structural-capture posture the Complainant has independently documented.

Rule 5.1(a); Rule 5.1(c)(2); ancillary Rule 8.4(1) — knowing assistance in marketing-rule violations. Documented in Doc ID AR-EVIDENCE-20260524-SGB-MARKETING-VIDEO at § II; cross-referenced in AR-GRV-20260524-SUPPLEMENT_BLOMBERG_MILLER Count 45; AR-GRV-20260524-WELSH_GAL_PATTERN Counts 5-8; AR-GRV-20260524-SCHOONMAKER_IV Count 4.

VI. RELIEF REQUESTED

1. The Complainant respectfully requests that the Statewide Grievance Committee:
 1. **Find probable cause** as to each of the four (4) violations documented above and refer the matter for full investigation and hearing under Practice Book § 2-32 et seq.
 2. **Order the Respondent and the SGB firm** to adopt — within 30 days of the SGC’s order — written firm-wide protocols addressing:
 1. attorney candor in tribunal disclosure of firm-pedigree ties (RPC 3.3 / Canon 2.11 compliance);
 2. conflict-disclosure under Rules 1.7 and 1.10, including Of Counsel and lateral-attorney imputation;
 3. reassignment of oath administration on client-side sworn documents to non-firm Commissioners of the Superior Court;
 4. clear delineation of paralegal versus attorney status in all outgoing firm correspondence;
 5. the duty of solicitude to pro se litigants under Practice Book § 23-3; and
 6. Rule 7.1-compliant firm marketing review, including a written marketing-content approval log identifying which named partners approved each public-facing marketing communication and a written acknowledgment by each named partner that he or she has reviewed Rule 7.1 as it applies to the firm’s bench-relationship branding.

Such written protocols to be submitted to the Statewide Grievance Committee for review and acceptance.

1. **Order takedown or material modification** of the marketing-video communication identified in Count 4 above, within 7 days of the SGC’s order.

2. **Consolidate** this complaint with the four companion complaints (AR-GRV-20260524-SUPPLEMENT_BLOMBERG_MILLER, AR-GRV-20260524-WELSH_GAL_PATTERN, AR-GRV-20260524-SCHOONMAKER_IV, AR-GRV-20260524-FODOR_DUAL_ROLE) and the principal complaint (AR-GRV-20260427-SGB-BLOMBERG_MILLER) for investigation and hearing.
 3. **Impose discipline** appropriate to the partner-level role, including consideration of a reprimand and a public-disclosure requirement that the Respondent and the firm submit annual compliance certifications to the SGC for a defined remediation period.
 4. **Issue such other relief** as the Statewide Grievance Committee deems appropriate.
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VII. ATTACHMENTS / EXHIBITS

The following exhibits accompany this complaint:

- **Exhibit A:** SGB official firm bio for Attorney Peter M. Bryniczka (sgbfamilylaw.com).
- **Exhibit B:** Greenwich Bar Association published Past Presidents list, identifying Attorney Bryniczka.
- **Exhibit C:** The principal complaint (AR-GRV-20260427-SGB-BLOMBERG_MILLER) — the 38-violation firm-wide pattern.
- **Exhibit D:** The Supplement (AR-GRV-20260524-SUPPLEMENT_BLOMBERG_MILLER) — the 6 supplemental counts.
- **Exhibit E:** The Welsh grievance (AR-GRV-20260524-WELSH_GAL_PATTERN) — 4 counts.
- **Exhibit F:** The Schoonmaker IV grievance (AR-GRV-20260524-SCHOONMAKER_IV) — 3 counts.
- **Exhibit G:** The Fodor grievance (AR-GRV-20260524-FODOR_DUAL_ROLE) — 3 counts.
- **Exhibit H:** SGB Associates research brief (SGB_ASSOCIATES_FODOR_PALMER_20260524.md) — establishing Palmer-paralegal status and Rule 5.3 supervisory context.

- **Exhibit I:** Defendant’s pre-grievance correspondence chain (AR-LTR-20260410-3301; AR-LTR-20260425-3303; AR-LTR-20260427-3306; AR-LTR-20260427-3307) — establishing constructive and actual notice to the SGB firm and Respondent of the conduct grieved.
- **Exhibit J:** Open Letter v2 (AR-OPENLTR-20260523-sgbe-msl) — establishing the public-record surfacing of the structural findings and the absence of substantive response.
- **Exhibit K:** SGB Marketing Video Transcript (Doc ID AR-EVIDENCE-20260524-SGB-MARKETING-VIDEO) — verbatim Whisper transcript of the publicly-distributed SGB teaser video; operative quote at timestamp 00:02:24.340 – 00:02:40.440 (transcribed § II).

Note on personal identifying information: Per Rule 1(F) of the Statewide Grievance Committee Rules of Procedure and Section 4-7(a) of the Connecticut Practice Book, all exhibits have been reviewed and redacted of personal identifying information.

VIII. 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 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.

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

Date: _____

Doc ID: AR-GRV-20260524-BRYNICZKA