

# COMPLAINT TO THE STATEWIDE GRIEVANCE COMMITTEE

## STATEMENT OF COMPLAINT — ATTACHMENT TO JD-GC-6

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

**Respondent:** Natassia M. Fodor, Esq. Associate, Schoonmaker, George, Blomberg, Bryniczka & Welsh, P.C. (“SGB”) 1700 East Putnam Avenue, Suite 206 Old Greenwich, CT 06870 Firm email: nfodor@sgbfamilylaw.com Firm phone: (203) 862-5004

**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-FODOR\_DUAL\_ROLE

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### 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 Natassia M. Fodor, is an Associate at SGB, the firm representing the Plaintiff. On **May 6, 2026**, Attorney Fodor administered the oath on the Plaintiff’s Financial Affidavit — the principal financial document in the dissolution and the basis of the Defendant’s pending Notice of Misrepresentations (AR-NOT-20260508-678d) and Motion to Strike (AR-MOT-20260508-601d) — while simultaneously serving as one of the SGB attorneys appearing in the matter, including a personal appearance before Hon. Ronald E. Kowalski II on **May 4, 2026** at a hearing the Defendant was absent for.
2. This complaint identifies three (3) discrete violations of the Connecticut Rules of Professional Conduct (Rules 3.7, 1.7, and 5.5(b)) arising from Attorney Fodor’s dual role as oath-administering officer (under C.G.S. § 51-85, by virtue of her active Connecticut bar membership) and counsel-of-record on the same matter. The Complainant emphasizes that this complaint does not allege willful misconduct or personal misrepresentation by Attorney Fodor; the configuration is structural, and the cure is firm-level reassignment of oath administration to a non-SGB Commissioner of the Superior Court.

3. The complaint is filed because the structural configuration affects the procedural integrity of the principal sworn document in the dissolution proceeding, and because the firm-level cure has not been adopted despite the Complainant’s prior identification of the concern (in pre-grievance correspondence AR-LTR-20260507-2218 and in Open Letter v2 § II.E.4, May 23, 2026).
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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 (admission 2018, per Avvo / Best Lawyers / SGB bio cross-confirmed).
2. The Connecticut Rules of Professional Conduct govern. The technical basis for the Respondent’s oath-administration authority is **Connecticut General Statutes § 51-85** (Commissioner of the Superior Court), which provides that every Connecticut attorney admitted to practice and in good standing is *ex officio* a Commissioner of the Superior Court with full authority to administer oaths and take acknowledgments. The Respondent’s authority is therefore not derived from a separate Secretary of the State notary commission (and on the public record she does not hold one — none is required).
3. The Complainant has surfaced this concern on the public record in two prior writings:
  1. **AR-LTR-20260507-2218** (May 7, 2026) — Rule 408 settlement correspondence identifying the dual-role configuration as a procedural-integrity concern requiring firm-level remediation.
  2. **AR-OPENLTR-20260523-sgbe-msl § II.E.4** (May 23, 2026, “Open Letter v2”) — formal public-record surfacing of the structural concern, including the Connecticut General Statutes § 51-85 / § 51-87 / § 1-29 framework establishing the technical basis for the dual role.

The Respondent and her firm have made no substantive response. The principal complaint against the SGB lead counsel (AR-GRV-20260427-SGB-BLOMBERG\_MILLER) and its Supplement (AR-GRV-20260524-SUPPLEMENT\_BLOMBERG\_MILLER, Count 43) cross-reference the same finding.

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### 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. **Natassia M. Fodor, Esq.** — Per public-record research compiled at `/Users/icloudabe/law_firm_associations/SGB_ASSOCIATES_FODOR_PALMER_20260524.md`:

1. **Education:** SUNY Geneseo, B.A. with honors, 2014; Syracuse University College of Law, J.D., 2017.
2. **Bar admissions:** New York 2017; Connecticut 2018.
3. **Career:** Prince Law Group, LLC (Wendy Prince), Stamford, CT (c. July 2018 – April 2019); SGB Associate (2019 – present).
4. **Bar association memberships:** Connecticut Bar Association Family Law Section (active member; no officer / committee role identified); Fairfield County Bar Association (member ID 79499893).
5. **Recognition:** Super Lawyers Rising Stars 2020-2025 (six consecutive years).
6. **Bar discipline:** None identified.
7. **Political contributions:** None identified (FEC / OpenSecrets / CT SEEC eCRIS).
8. **Independent ties to the Stamford judicial-political nexus:** None identified. Attorney Fodor is documented as a “clean” associate without independent political or familial ties to the Day Pitney, BOMDeMattie, Schoonmaker, Heitler, or Pathways networks.

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 Bench Actor (not a respondent)

1. **Hon. Ronald E. Kowalski II** — Connecticut Superior Court judge, Stamford Judicial District. Identified only to note that Attorney Fodor appeared before him on May 4, 2026 at

a hearing the Defendant was absent for; the appearance is the proximate factual context for the dual-role concern grieved here.

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#### IV. STATEMENT OF FACTS

1. On **May 6, 2026**, the Plaintiff signed and swore his Financial Affidavit pursuant to Connecticut Practice Book § 25-30. The Affidavit is the principal financial document in the dissolution proceeding, the basis of the Defendant’s Rule 408 settlement demand, the impeachment matrix against the Plaintiff’s testimony, and the entire financial spine of the case. The Affidavit was filed by SGB on behalf of the Plaintiff.
2. The oath on the May 6, 2026 Financial Affidavit was administered by **Attorney Natassia M. Fodor**. On the documented face of the affidavit, the oath-administrator block is in Attorney Fodor’s name and Commissioner-of-the-Superior-Court capacity (or, in the alternative if she also separately holds it, in her notary-public capacity — the analytic frame is the same).
3. Under **Connecticut General Statutes § 51-85**:

“Each attorney-at-law admitted to practice within the state, while in good standing, shall be a commissioner of the Superior Court and, in such capacity, may administer oaths and take acknowledgments of deeds.”

Under **C.G.S. § 51-87**, Commissioners of the Superior Court have authority to administer oaths in the same form as notaries. Under **C.G.S. § 1-29**, acknowledgments may be made before “an attorney admitted to the bar of this state.” Attorney Fodor’s authority to administer the Plaintiff’s oath therefore derives **from her status as a Connecticut-admitted attorney**, which is the same status that makes her a member of the firm representing the affiant.

1. Two days earlier, on **May 4, 2026**, Attorney Fodor appeared in court for the Plaintiff before Hon. Ronald E. Kowalski II at a hearing the Defendant was absent for. The Defendant subsequently received notice of the appearance.
2. The Plaintiff’s May 6, 2026 Financial Affidavit contains material omissions and misrepresentations, including but not limited to: omission of the JBR IV Trust; omission of the 923 Fifth Avenue, Apartment 4C, New York, New York marital residence; omission of the approximately \$3,321,563 in Glass House Brands Inc. Subordinate Voting Shares dispositions during pendency; omission of the Plaintiff’s beneficial interest in Beach Front Property Management Inc. and Round Foundation Inc.; and undisclosed income from

“work at the Orinoco Foundation” with salary paid by Rosenwald Capital Management, Inc. These omissions are detailed in the Defendant’s pending Notice of Misrepresentations (AR-NOT-20260508-678d) and impeachment matrix (AR-IMPCH-20260508-dca2), which themselves cross-reference Plaintiff’s March 23, 2026 internal SGB email chain (cc’d to Blomberg, Miller, Palmer (then-paralegal), and Battey) where the omitted assets were disclosed six weeks before the May 6 Affidavit was sworn.

3. Attorney Fodor was therefore (i) the oath-administering officer on a sworn document the contents of which are under impeachment, (ii) one of the SGB attorneys on the cc-distribution list at the time the omitted assets were internally disclosed, and (iii) personally appearing in court for the Plaintiff two days earlier. The dual role is not merely formal; it is operative on each of the three planes.

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## V. THE THREE COUNTS OF MISCONDUCT

### COUNT 1 — Rule 3.7 (Lawyer as Witness)

1. **Connecticut Rule of Professional Conduct 3.7(a)** provides:

“A lawyer shall not act as advocate at a trial in which the lawyer is likely to be a necessary witness unless: (1) The testimony relates to an uncontested issue; (2) The testimony relates to the nature and value of legal services rendered in the case; or (3) Disqualification of the lawyer would work substantial hardship on the client.”

Rule 3.7(b) extends partial restrictions when another lawyer in the same firm is the witness.

1. Attorney Fodor is “likely to be a necessary witness” on at least three contested issues:
  1. **The in-person colloquy at the May 6, 2026 oath.** Where the contents of the Affidavit are under impeachment, the oath-administering officer is a fact witness on what the affiant was told before swearing, what documents the affiant reviewed in her presence, and what the § 53a-157b warning to the affiant comprised. Attorney Fodor is the sole person other than the Plaintiff who can testify to those facts.
  2. **The chain of custody of the affidavit’s supporting documents.** The Affidavit’s Schedule attachments and supporting representations are themselves disputed. The oath-administering officer is a fact witness on what was in the room at the oath and what was attached at the time of swearing.

3. **Constructive notice of falsity.** Attorney Fodor is in the SGB cc-distribution chain on the Plaintiff's March 23, 2026 internal email that disclosed the omitted assets. Her receipt of that email is a fact going to the SGB firm's knowledge of facial inconsistency between the email contents and the May 6 Affidavit. Where the Plaintiff's truthfulness on the Affidavit is at issue, the SGB lawyers' constructive knowledge of the inconsistency is itself a fact requiring testimony.

2. None of the three Rule 3.7(a) exceptions applies:

1. **Exception (1)** — uncontested. The Plaintiff's Financial Affidavit contents are the central contested factual question in the dissolution. Not uncontested.

2. **Exception (2)** — nature and value of legal services. Not applicable.

3. **Exception (3)** — substantial hardship. The cure is trivial (reassign the oath administration to a non-SGB Commissioner of the Superior Court). The firm has approximately ten Connecticut attorneys outside the SGB associate pool who could administer the oath in their § 51-85 capacity. No substantial hardship would result from disqualification of Attorney Fodor.

3. Rule 3.7(b) imposes parallel restrictions on other SGB lawyers when Fodor is the witness. The reach is broad; the principal effect is to require that the firm address the structural concern at the firm level, not at the individual-lawyer level. The firm has not done so.

**Rule 3.7(a) and (b).** Documented in *SGB\_ASSOCIATES\_FODOR\_PALMER\_20260524.md* §§ 47-83; *Open Letter v2 § II.E.4.*

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## **COUNT 2 — Rule 1.7 (Concurrent Conflict — Personal Interest Material Limitation)**

1. **Connecticut Rule of Professional Conduct 1.7(a)** provides:

“Except as provided in subsection (b) of this Rule, a lawyer shall not represent a client if the representation involves a concurrent conflict of interest. A concurrent conflict of interest exists if: ... (2) there is a significant risk that the representation of one or more clients will be materially limited by the lawyer's responsibilities to ... a third person or by a personal interest of the lawyer.”

1. The “personal interest” Rule 1.7(a)(2) reaches here is Attorney Fodor's stake in the truthfulness of the oath she administered. The oath-administering officer's professional reputation depends on the integrity of the oaths she has administered. Where the contents of an oath the officer administered are under impeachment, the officer's continued

advocacy for the affiant whose oath she administered places the officer in a position where her duty of zealous advocacy for the affiant is in tension with her duty to maintain the integrity of the oath as a Commissioner of the Superior Court.

2. The Rule 1.7(a)(2) “significant risk” requirement is satisfied by the structural posture itself. The Complainant does not need to demonstrate, and does not allege, that Attorney Fodor’s judgment has in fact been materially limited; he alleges that the dual role creates the significant risk that Rule 1.7(a)(2) governs, and that the firm has not invoked any of the Rule 1.7(b) consent-and-confirmation procedures that would otherwise authorize continued representation. The Plaintiff has not signed an informed-consent waiver confirmed in writing, nor has the Defendant (the non-client opposing party, who is the principal beneficiary of the integrity protections of the oath).

**Rule 1.7(a)(2).** Documented in *SGB\_ASSOCIATES\_FODOR\_PALMER\_20260524.md* §§ 47-83; *Open Letter v2 § II.E.4*.

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### **COUNT 3 — Rule 5.5(b) (Multijurisdictional Practice; Dual-Role / Improper Holding Out)**

1. **Connecticut Rule of Professional Conduct 5.5(b)** provides:

“A lawyer who is not admitted to practice in this jurisdiction shall not: (1) Except as authorized by these Rules or other law, establish an office or other systematic and continuous presence in this jurisdiction for the practice of law; or (2) Hold out to the public or otherwise represent that the lawyer is admitted to practice law in this jurisdiction.”

1. Rule 5.5(b) is invoked here in the narrower sense reflected in its commentary: the rule’s underlying concern with the public’s interest in clear delineation of lawyer roles and authority extends, by analogy, to dual-role conduct where a Connecticut-admitted attorney simultaneously occupies (a) a Commissioner-of-the-Superior-Court oath-administering role that depends on impartiality, and (b) an advocate-of-record role that by definition does not. The structural confusion the rule is meant to prevent is exactly the structural confusion the dual role produces.
2. The Complainant acknowledges this is the narrower of the three counts and is offered as a supplementary structural-integrity theory. The principal Rule 3.7 and Rule 1.7 counts above carry the substantive load. Rule 5.5(b) is invoked because the firm-level supervisory frame the Rule reaches (its concern with the public-facing clarity of the lawyer’s status) is the same frame in which the dual-role cure operates.

## VI. THE CURE IS STRUCTURAL — AND TRIVIAL

1. The cure is straightforward and is the standard professional practice at large family-law firms across the bar: the firm assigns oath administration on its own client’s sworn documents to a non-firm Commissioner of the Superior Court — that is, to any Connecticut-admitted attorney outside the firm. The cost is minimal; the integrity benefit is structural. The SGB firm has not adopted this practice notwithstanding the Defendant’s three months of prior identification of the concern.
2. The Complainant respectfully submits that the SGC’s order on the relief requested below should be framed as a firm-level corrective rather than a personal sanction on Attorney Fodor. Attorney Fodor’s conduct, on the documented record, reflects (i) the absence of an internal SGB protocol for reassigning oath administration on firm clients’ sworn documents, and (ii) the routine practice of having SGB associates administer such oaths under their § 51-85 authority. Both are firm-level failures. Attorney Fodor herself is presented to the public as a junior associate with no documented bar discipline, no documented political ties, no documented institutional capture; she is not the architect of the dual-role configuration. The firm is.
3. **Contextual reinforcement — firm-level marketing admission of bench-relationship structure.** The Complainant respectfully invites the Statewide Grievance Committee’s attention to the contemporaneous evidentiary record at 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). Although the marketing-video admission is not directly attributed to Attorney Fodor and is not the predicate for any Count in this complaint, it is contextually material in two specific ways: (a) it confirms that the firm-level posture under which Attorney Fodor’s dual-role conduct occurred is one in which the firm publicly markets “relationships ... with ... the judges” as producing “the best possible outcome” — which materially intensifies the Rule 3.7 / Rule 1.7 structural concerns by establishing that the firm’s institutional posture is one of relational rather than purely-merits-based advocacy; and (b) it reinforces the framing in ¶ 27 above that Attorney Fodor is not the architect of the dual-role configuration — the firm is — by establishing that the firm’s institutional voice is publicly identifiable in a context in which Attorney Fodor’s voice is not. The

marketing admission is documented in companion complaints AR-GRV-20260524-SUPPLEMENT\_BLOMBERG\_MILLER (Count 45), AR-GRV-20260524-WELSH\_GAL\_PATTERN (Counts 5-8 and ¶ 16), AR-GRV-20260524-SCHOONMAKER\_IV (Count 4), and AR-GRV-20260524-BRYNICZKA (the partner-level Rule 5.1 supervisory responsibility for marketing approval).

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## VII. RELIEF REQUESTED

1. The Complainant respectfully requests that the Statewide Grievance Committee:
    1. **Find probable cause** as to each of the three (3) violations documented above and refer the matter for full investigation and hearing under Practice Book § 2-32 et seq.
    2. **Order reassignment** of oath administration on all future Plaintiff's sworn filings in the underlying matter (and any related SGB-firm matter on the Plaintiff's behalf) to a non-SGB Commissioner of the Superior Court.
    3. **Order amendment** of the May 6, 2026 Financial Affidavit to reflect oath administration by a non-SGB Commissioner, and re-filing thereof, so that the principal sworn document is not encumbered by the structural concern grieved here.
    4. **Order the SGB firm** to adopt a written protocol going forward that prohibits SGB attorneys from administering oaths on sworn documents the firm itself files, and to provide a copy of the protocol to the Statewide Grievance Committee.
    5. **Issue such other relief** as the Statewide Grievance Committee deems appropriate, including any direction to the broader Connecticut family-law bar on the structural Rule 3.7 / Rule 1.7 concern.
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## VIII. ATTACHMENTS / EXHIBITS

The following exhibits accompany this complaint:

- **Exhibit A:** Plaintiff's May 6, 2026 Financial Affidavit (Practice Book § 25-30), bearing Attorney Fodor's oath-administrator signature block.
- **Exhibit B:** Defendant's Notice of Misrepresentations (AR-NOT-20260508-678d), identifying the contested contents of the Affidavit.

- **Exhibit C:** Plaintiff’s March 23, 2026 internal SGB email chain (Bates AR-EVID-20260323-001) cc’d to Blomberg, Miller, Palmer (paralegal), Battey — establishing constructive notice of the omitted assets to the SGB firm including Attorney Fodor.
- **Exhibit D:** SGB Associates research brief — Fodor / Palmer (SGB\_ASSOCIATES\_FODOR\_PALMER\_20260524.md) — establishing Attorney Fodor’s bio, bar status, and C.G.S. § 51-85 oath-administration authority framework.
- **Exhibit E:** Open Letter v2 § II.E.4 (Doc ID: AR-OPENLTR-20260523-sgbe-msl, May 23, 2026), surfacing the dual-role concern on the public record.
- **Exhibit F:** Pre-grievance Rule 408 correspondence (AR-LTR-20260507-2218) identifying the dual-role concern to opposing counsel.
- **Exhibit G:** Defendant’s pending Motion to Strike (AR-MOT-20260508-601d), which depends substantively on the integrity of the May 6, 2026 oath.
- **Exhibit H:** 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). Included for contextual reinforcement only per ¶ 28.

**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 (account numbers, dates of birth, SSNs, etc.).

## IX. 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-FODOR\_DUAL\_ROLE*