

# 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:** Samuel V. Schoonmaker IV, Esq. Current Chair, Connecticut Bar Association Family Law Section Of Counsel, Broder Orland Murray DeMattie LLC (“BOMDeMattie”) 55 Greens Farms Road, Westport, CT 06880 Also identified at: The Schoonmaker Legal Group, LLC, 2777 Summer Street, Stamford, CT 06905

**Underlying matter:** *Rosenwald v. Rosenwald*, FST-FA26-6078292-S (dissolution); FST-FA26-5033652-S (restraining order, post-judgment). Companion docket: *Wharton v. Wharton*, FST-FA26-6078190-S (SGB-vs-BOMDeMattie 36-day uncontested disposition before Hon. Thomas Joseph O’Neill, 2/17/2026).

**Date:** May 24, 2026

**Doc ID:** AR-GRV-20260524-SCHOONMAKER\_IV

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### I. INTRODUCTION

1. The Complainant, Abraham Rosenwald, is the pro se Defendant in a Connecticut dissolution action and post-judgment restraining-order matter pending in the Stamford Judicial District. The Respondent, Attorney Samuel V. Schoonmaker IV, is the current Chair of the Connecticut Bar Association Family Law Section and is Of Counsel to Broder Orland Murray DeMattie LLC (“BOMDeMattie”). The Respondent has not personally entered an appearance in the Defendant’s underlying matters. The conduct grieved here concerns the Respondent’s failure, as Section Chair, to disclose the firm-pedigree ties between himself and at least two Connecticut Superior Court judges whose dockets have touched the Defendant’s matters — specifically, the **Day, Berry & Howard** pedigree the Respondent shares with **Hon. Thomas Joseph O’Neill** — and the broader failure of attorney candor that the Respondent’s silence on those ties constitutes.

2. This complaint identifies four (4) discrete violations of the Connecticut Rules of Professional Conduct (Rules 1.7, 3.3, 8.4, and 7.1/5.1) arising from the Respondent's heightened duty as Section Chair to model conflict disclosure and to ensure firm-level conformance with the Rules. The pattern is documented from public records: the Respondent's own firm bios at BOMDeMattie and at the historic Schoonmaker Legal Group LLC; the Day Pitney partner roster; the merged Stamford-SGB / BOMDeMattie dataset compiled by the Complainant (29 dockets, 2009-2026); and the SGB firm marketing video preserved at Doc ID AR-EVIDENCE-20260524-SGB-MARKETING-VIDEO.
  3. The Complainant emphasizes that this complaint is not a challenge to the Respondent's distinguished career, nor to the legitimacy of his Of Counsel role at BOMDeMattie. The complaint addresses only the Section Chair's professional-conduct duty to surface firm-pedigree ties relevant to Canon 2.11(B)(2) disclosure — a duty made acute by his Chair role, by his multi-firm career arc, and by the Connecticut family-court bar's general practice of disclosing such ties as a matter of professional courtesy.
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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. The Connecticut Code of Judicial Conduct, Canon 2.11(B)(2), is referenced as context to the bar-side duty grieved here.
  3. The Complainant has not served a pre-grievance letter on the Respondent individually but has served Open Letter v2 (Doc ID: AR-OPENLTR-20260523-sgbe-msl, May 23, 2026) on the SGB firm and the larger institutional roster including, by reasonable extension via Section Chair role and BOMDeMattie firm posture, the Respondent. Section II.E.3 of the Open Letter specifically identifies the Day, Berry & Howard pedigree finding and the *Wharton* contemporaneous-disposition context that frame this complaint. No substantive response has been received.
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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 (1127 High Ridge Road, Suite 151, Stamford, CT 06905). Member of the class of pro se family-court litigants for whom Practice Book § 23-3 duty of solicitude was promulgated.

#### B. Respondent

1. **Samuel V. Schoonmaker IV, Esq.** — Per public firm bios (BOMDeMattie firm page; Schoonmaker Legal Group LLC firm page at [schoonlegal.com](http://schoonlegal.com); Super Lawyers profile; Best Lawyers profile):
  1. **1992-1994** — Litigation associate, Day, Berry & Howard, Hartford. Day, Berry & Howard merged into Day Pitney in 2007.
  2. **1996-c. 2007** — Partner, Schoonmaker & George (the predecessor of SGB), Greenwich.
  3. **2007-2022** — Founder and principal, The Schoonmaker Legal Group LLC (boutique appellate / family law practice), 2777 Summer Street, Stamford, CT 06905.
  4. **2022-present** — Of Counsel, Broder Orland Murray DeMattie LLC, 55 Greens Farms Road, Westport, CT 06880.
  5. **Current** — Chair, Connecticut Bar Association Family Law Section.
  6. **Scholarship** — author of the 2020 *Family Law Quarterly* article cited as foundational authority in the 2025 Diana / Bozzuto *JAAML* article that introduces the Pathways/TMO architecture.

Address of record: 55 Greens Farms Road, Westport, CT 06880 (BOMDeMattie). Juris number: to be supplied at filing (publicly listed in the CT Judicial Branch attorney directory).

#### C. Underlying Bench Actors (not respondents)

1. **Hon. Thomas Joseph O'Neill** — Connecticut Superior Court judge, Fairfield Judicial District (Bridgeport); also presiding on Stamford-area matters including Defendant's docket. Per his public Day Pitney attorney bio archive, O'Neill, J., became a partner at Day Pitney on January 4, 2014.

2. **Hon. Ronald E. Kowalski II** — Connecticut Superior Court judge, Stamford Judicial District; pre-bench, partner at Cacace, Tusch & Santagata (Stamford). Per the merged dataset, Kowalski, J., has presided over at least 2 SGB-vs-BOMDeMattie uncontested dissolutions (McKee 1/2/2025; Walker 9/30/2024).
  3. Neither judge is a respondent. They are identified to establish the structural pattern that triggers the Respondent’s heightened duty under Rule 3.3 and 1.7.
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#### IV. STATEMENT OF FACTS

1. The Complainant’s research into the merged Stamford-SGB / BOMDeMattie dataset (compiled at `/Users/icloudabe/Downloads/MERGED_STAMFORD_SGB_DATASET/MERGED_case_metadata.csv` and analyzed at `/Users/icloudabe/law_firm_associations/BOMDEMATTIE_SGB_29_DOCKET_DEEP_DIVE_20260524.md`) identifies twenty-nine (29) dockets in which SGB and BOMDeMattie have appeared on opposite sides between 2009 and the present. Twenty-eight (28) of the twenty-nine are dissolution dockets; one (1) is a UIFSA child-support registration. Twenty-seven (27) of the twenty-nine are uncontested-style judgments (UNCONTESTED DISSOLUTION or single-day JUDGMENT WITHOUT TRIAL). Eleven (11) remain 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, J., Kowalski, J., and Cooper, J. — have prior SGB-vs-BOMDeMattie disposition experience:
  1. **O’Neill, J.:** 2 dispositions (Seibold/Weinstein 2/14/2025; *Wharton* 2/17/2026 in 36 days from filing — contemporaneous with the Defendant’s case).
  2. **Kowalski, J.:** 2 dispositions (McKee 1/2/2025; Walker 9/30/2024).
  3. **Cooper, J.:** 1 disposition (Barone 7/22/2024).
3. The Respondent’s pre-bench career began at **Day, Berry & Howard** (1992-1994). Day, Berry & Howard merged into Day Pitney in 2007. **O’Neill, J.**, became a partner at Day Pitney on January 4, 2014. The Respondent and O’Neill, J., share the Day Pitney / Day, Berry & Howard pedigree. This is not, by itself, a Rule of Professional Conduct violation — but it is a fact that, under Connecticut Code of Judicial Conduct Canon 2.11(B)(2), is a candidate for required judicial disclosure, and that, under Connecticut Rule of Professional Conduct 3.3 (Candor Toward the Tribunal), attorney candor would be expected to surface.

4. On **February 17, 2026** — while *Rosenwald v. Rosenwald* was actively pending before O’Neill, J. — O’Neill, J., disposed of *Wharton v. Wharton* (FST-FA26-6078190-S) in 36 days from filing. *Wharton* is an SGB-vs-BOMDeMattie uncontested dissolution. SGB is on the Plaintiff side. The Respondent’s current firm (BOMDeMattie) is on the Defendant side. The Day Pitney / Day, Berry & Howard pedigree colleague of the Respondent (O’Neill, J.) entered the disposition.
  5. Connecticut Practice Book § 17-43 provides a four-month window during which a judgment may be opened for cause. The four-month window on the *Wharton* disposition closes on approximately **June 17, 2026**. The disclosure question is therefore time-limited and operative.
  6. The Respondent has been Of Counsel to BOMDeMattie since 2022. Under Connecticut Rule of Professional Conduct 1.10(a) and the Connecticut Supreme Court’s settled treatment of Of Counsel relationships (see *Bergeron v. Mackler*, 225 Conn. 391 (1993); *State v. Jones*, 180 Conn. 443 (1980)), the Of Counsel attorney is treated as a full member of the firm for conflict-imputation purposes. The Respondent’s Day Pitney / Day, Berry & Howard pedigree, and his role as the Section Chair of the Connecticut Bar Association Family Law Section, are operative in every BOMDeMattie case in which he is imputable. He is imputable in all of them.
  7. The Respondent has additional pedigree ties that intersect with other judges on the Defendant’s bench: as a partner at the predecessor SGB (1996-c. 2007), he was in the firm of which **Hon. Stanley Novack** (1987 CBA Family Law Section Distinguished Jurist Award; 1994 CT-AAML Distinguished Service Award; family-matters JTR for 20+ years prior to his death June 9, 2024) was the recurring fact-finder. The Section that conferred those awards is the same Section the Respondent now chairs. Hon. Novack disposed 5 of the 29 SGB-vs-BOMDeMattie dockets — the largest single-judge share on the list.
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## **V. THE FOUR COUNTS OF MISCONDUCT**

### **COUNT 1 — Rule 1.7(a)(2) (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 Respondent’s dual posture — (a) Section Chair of the CBA Family Law Section, an institutional position from which he speaks for the matrimonial bar, and (b) Of Counsel to BOMDeMattie, a firm that opposes SGB in 29 documented dockets including the contemporaneous *Wharton* matter before O’Neill, J. — creates a “significant risk” that representation by BOMDeMattie in any matter before O’Neill, J., Kowalski, J., or Cooper, J. will be materially limited by the personal interest of the Respondent in maintaining (i) his Section Chair role, (ii) his Day Pitney / Day, Berry & Howard collegial relationships, and (iii) his historic SGB firm relationships notwithstanding the present opposing-side firm posture.
2. The conflict is not theoretical. On the documented record, the Respondent has not surfaced — through any disclosure of record in any of the 29 dockets — the firm-pedigree overlap with O’Neill, J., or the historic SGB tie that imputes to BOMDeMattie clients in any case where the SGB client was previously his client at SGB. The Respondent’s personal interest in not surfacing these ties is, structurally, in tension with his client’s interest in receiving complete disclosure of any factor that might affect the impartiality of the tribunal.

**Rule 1.7(a)(2).** Documented in *BOMDEMATTIE\_SGB\_29\_DOCKET\_DEEP\_DIVE\_20260524.md* §§ 2.1-2.6; *Open Letter v2* § II.E.3.

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**COUNT 2 — Rule 3.3(a)(1) and 3.3(d) (Candor Toward the Tribunal)**

1. **Connecticut Rule of Professional Conduct 3.3(a)(1)** provides that a lawyer shall not knowingly “[m]ake a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer.” Rule 3.3(d) provides that “[i]n 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, whether or not the facts are adverse.” The Connecticut Practice Book’s commentary on Rule 3.3 makes clear that the candor obligation extends to disclosures necessary to permit the tribunal to make informed disposition decisions, particularly on scheduling and routing.

2. As Section Chair, the Respondent occupies a heightened duty to model attorney candor. His firm appears in 29 dockets opposite SGB; in 5 of those dockets, the disposing judge (Novack) has career-recognition awards from the Section he now chairs. In 5 others, the disposing judge is a fellow Day Pitney / Day, Berry & Howard alumnus (O’Neill) or a fellow Stamford-bar peer (Kowalski, Cooper). The Section Chair’s silence on these patterns, in cases where the patterns are material to Canon 2.11(B)(2) disclosure on the bench side, is a Rule 3.3 failure on the bar side.
3. The candor duty becomes acute in *Wharton*: O’Neill, J., disposed *Wharton* on 2/17/2026 with the Respondent’s firm on one side and the Respondent’s former firm on the other. The Respondent’s silence on the Day Pitney / Day, Berry & Howard pedigree, in a case before the very judge who shares it, is a textbook Rule 3.3(a)(1) failure. The Practice Book § 17-43 four-month window closes June 17, 2026, after which the *Wharton* judgment becomes substantially harder to disturb on conflict grounds. The candor duty is time-limited and operative.

**Rule 3.3(a)(1); Rule 3.3(d).** Documented in  
*BOMDEMATTIE\_SGB\_29\_DOCKET\_DEEP\_DIVE\_20260524.md* §§ 3.6, 3.8; *Open Letter v2 § II.E.3*.

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**COUNT 3 — Rule 8.4(d) (Conduct Prejudicial to the Administration of Justice)**

1. **Connecticut Rule of Professional Conduct 8.4(d)** provides:

“It is professional misconduct for a lawyer to: ... (4) Engage in conduct that is prejudicial to the administration of justice ....”

1. The Respondent’s silence on the structural-disclosure pattern grieved in Counts 1 and 2 is itself prejudicial to the administration of justice in three distinct ways:
  1. It deprives the affected tribunals of information they would, under Canon 2.11(B)(2), be required to disclose. The judges cannot disclose what they do not know — and the Section Chair is among the better-positioned attorneys in Connecticut to bring the pattern to the tribunals’ attention.
  2. It deprives the opposing parties — including the Defendant in the present matter and the BOMDeMattie-represented and SGB-represented parties in the 29 dockets — of the information they would need to evaluate a Canon 2.11 disqualification motion or a Practice Book § 17-43 motion to open judgment.

3. It deprives the bar generally of a model of disclosure that the Section Chair, of all Connecticut attorneys, has the institutional duty to model. The CBA Family Law Section is the principal voluntary professional organization that the Judicial Branch consults on family-court rule-making. The Section’s institutional credibility depends on the personal credibility of its officers in matters of professional candor. The Respondent’s silence on the structural-disclosure pattern is a misuse of his Section-Chair platform, and it is prejudicial to the administration of justice for that institutional reason as well.

2. The Complainant emphasizes that the relief requested below is corrective, not punitive. The Respondent’s distinguished career and the absence of any documented bar discipline are weighed in the relief recommendation. The Respondent’s failure of candor is alleged as the operative violation. The disclosure cure is straightforward and consistent with the bar’s normal practice.

**Rule 8.4(4).** Documented in *BOMDEMATIE\_SGB\_29\_DOCKET\_DEEP\_DIVE\_20260524.md* §§ 3.2-3.10; *Open Letter v2 § II.E.3*.

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**COUNT 4 — Rule 7.1 (Communications Concerning Lawyer Services) / Rule 5.1 (Responsibilities of Partners, Managers, and Supervisory Lawyers) — Section Chair institutional architecture of firm-promulgated bench-relationship marketing**

1. The Respondent, as current Chair of the Connecticut Bar Association Family Law Section and a former SGB partner (1996–c. 2007), is the institutional architect of the SGB firm’s professional posture. On the documented record, the SGB firm — under its current trade name “Schoonmaker George Premier Family Law Firm in Connecticut” — has caused to be publicly distributed (no later than May 13, 2026) a marketing/teaser video of approximately four minutes’ duration. The 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 communication is a per-se **Rule 7.1** violation: it creates an unjustified expectation about results (the firm’s bench-relationships produce “best possible outcome”), and it implies that the firm achieves results by means that violate Rule 3.5 (Impartiality of Tribunal) and Code of Judicial Conduct Canons 2.4 and 3.10. The Section Chair’s heightened duty to model attorney candor applies *a fortiori* to the firm’s public marketing communications. Although the Respondent is no longer an active SGB partner, the firm retains the founding-line trade name (Schoonmaker), the firm bio explicitly traces its founding line to the Respondent’s grandfather and father, and the firm’s continuous officer-level capture of the Section (Schoonmaker III → Schoonmaker IV → George → Welsh → Miller) makes the Respondent the institutional architect of the firm’s public posture even after his formal departure.
2. **Rule 5.1** is independently implicated. The Respondent — by virtue of his historic founding-line partner status, his Section Chair role, and his continuing public association with the firm’s trade name — is among the small set of attorneys who plausibly possess “comparable managerial authority” in the institutional sense Rule 5.1(a) reaches, even where he no longer holds an equity partnership. The Section’s institutional voice has heightened reach into the firm’s brand communications. The Respondent’s failure to take reasonable measures to prevent or correct the marketing communication — including, at minimum, a public disassociation from the bench-relationship marketing posture — is a Rule 5.1(a) failure to ensure firm conformance with the Rules. The Complainant frames this as a narrower Rule 5.1 theory than the partner-level theory pleaded against Attorney Bryniczka in the companion complaint AR-GRV-20260524-BRYNICZKA; the Respondent’s exposure here arises from his institutional, not his current-firm-equity, role.
3. The Complainant respectfully submits that the marketing-video admission is also independently relevant to Counts 1 through 3 above: each of the conflict-disclosure failures grieved earlier in this complaint is now framed by the firm’s own public marketing as the product of the very bench-relationship the Respondent should have disclosed. The Section Chair’s silence on the marketing communication is the institutional analog of the Section Chair’s silence on the firm-pedigree ties; both are failures of the candor obligation a Chair owes to the bench, the bar, and the public.

**Rule 7.1; Rule 5.1(a).** Documented in Doc ID AR-EVIDENCE-20260524-SGB-MARKETING-VIDEO at § II; cross-referenced in companion complaints AR-GRV-20260524-WELSH\_GAL\_PATTERN (Welsh attribution), AR-GRV-20260524-BRYNICZKA (partner-level Rule 5.1 supervisory responsibility), AR-GRV-20260524-SUPPLEMENT\_BLOMBERG\_MILLER (firm-level Rule 7.1 / Rule 8.4(d) imputation), and AR-JRC-20260524-DIANA\_COOPER\_ONEILL\_KOWALSKI (Canon 2.11(B)(2) bench-side disclosure obligation).

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## 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 corrective disclosure** in every pending matter where the Respondent or BOMDeMattie is counsel of record, identifying (i) the Respondent's Day, Berry & Howard / Day Pitney pedigree as it intersects with O'Neill, J., (ii) the Respondent's SGB historic-partner pedigree as it imputes to opposing party representations under Rule 1.10, and (iii) the existence and content of the SGB marketing-video communication identified in Count 4. Such disclosure to be filed by BOMDeMattie within 14 days of the SGC's order in each pending case.
  3. **Refer the Wharton matter** specifically to the Statewide Grievance Committee's expedited-review docket so that any Rule 3.3 corrective action on the 2/17/2026 disposition can be coordinated with any Practice Book § 17-43 motion before the four-month window closes on or about June 17, 2026.
  4. **Refer the underlying Canon 2.11 disclosure question** for each of the three affected judges (O'Neill, Kowalski, Cooper), and the Canon 2.11(B)(2) / Canon 2.4(C) question with respect to Hon. Leo V. Diana, to the Connecticut Judicial Review Council, for parallel evaluation on the bench side.
  5. **Order or recommend Section Chair role review.** Given the heightened institutional-credibility expectations of the Section Chair role and the Respondent's structural posture as architect of the firm's public-facing brand, recommend to the Connecticut Bar Association that the Section consider whether the Respondent should remain in the Chair role pending SGC disposition of this complaint.

6. **Issue such other relief** as the Statewide Grievance Committee deems appropriate, including any direction to the Respondent regarding the institutional posture of the Section Chair role going forward.

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## VII. ATTACHMENTS / EXHIBITS

The following exhibits accompany this complaint:

- **Exhibit A:** Broder Orland Murray DeMattie LLC firm bio for Samuel V. Schoonmaker IV (current Of Counsel listing).
- **Exhibit B:** The Schoonmaker Legal Group LLC firm page (schoonlegal.com), establishing the 2007-2022 boutique tenure.
- **Exhibit C:** Day Pitney public attorney directory archive entry for Hon. Thomas Joseph O’Neill (Day Pitney partner from 1/4/2014).
- **Exhibit D:** Merged Stamford-SGB / BOMDeMattie dataset summary (BOMDEMATTIE\_SGB\_29\_DOCKET\_DEEP\_DIVE\_20260524.md), Sections 1.1 – 1.30, identifying all 29 dockets and the disposing judges.
- **Exhibit E:** *Wharton v. Wharton*, FST-FA26-6078190-S — public docket history showing the 36-day SGB-vs-BOMDeMattie uncontested disposition before O’Neill, J., on 2/17/2026.
- **Exhibit F:** Open Letter v2 § II.E.3 (Doc ID: AR-OPENLTR-20260523-sgbe-msl, May 23, 2026), surfacing the pedigree overlap on the public record.
- **Exhibit G:** 2020 *Family Law Quarterly* article by Samuel V. Schoonmaker IV cited as foundational authority in the 2025 Diana / Bozzuto *JAAML* Pathways/TMO article (CBA-distributed and publicly archived).
- **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).

**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 of parties and non-respondent third persons.

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### 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.

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

Date: \_\_\_\_\_

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*Doc ID: AR-GRV-20260524-SCHOONMAKER\_IV*