

BADATZ
RABBINICAL COURT



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A.C. 43726: APPELLATE COURT

STATE OF CONNECTICUT:

: OF CONNECTICUT

v.:

DANIEL GREER

Defendant-Appellant: MARCH 25, 2020

**APPLICATION OF THE BEIS DIN TZEDEK OF LAKEWOOD INC. FOR
PERMISSION TO APPEAR AS AMICUS CURIAE AND APPEAR
IN SUPPORT OF DEFENDANT-APPELLANT DANIEL GREER**

Under Practice Book Sections 66 and 67-7 of the State of Connecticut, the Beis Din Tzedek of Lakewood Inc. hereby moves this Honourable Court for permission to appear as *amicus curia* in this matter and to file an *amicus* brief in support of Defendant-Appellant Daniel Greer.

I. BRIEF HISTORY OF THE CASE

Rabbi Daniel Greer was convicted on September 25, 2019 of charges of risk of injury to a minor. He was sentenced to 12 years on December 2, 2019. The judge refused to give him bond while he was taking his appeal. This Honourable Court denied a motion for bond on December 23, 2019.

The trial judge again denied a new request for bond on March 2d on the basis of changed circumstances. Defendant Rabbi Greer has now filed a motion with this Honourable Court again, asking for bail while on appeal. That motion was dated March 12, 2020.

II. SPECIFIC FACTS RELIED UPON

1. Nature of Applicant Interest

Applicant Beis Din Tzedek of Lakewood, Inc. is an Orthodox Jewish rabbinical court based in Lakewood, New Jersey that presides over disputes relating to financial, marital and other matters. Our organization is often used by members of the Jewish faith as an alternative to judicial courts. The Beis Din, sometimes called a 'Beth Din' was established in 2010. The people who preside over the disputes are 12 Orthodox rabbis. We help decide and resolve approximately 350 cases and disputes a year.

Our organization has a strong interest in issues relating to the Orthodox Jewish Community in the United States. We are opposed to any form of discrimination against Jews and are especially sensitive to the treatment of Orthodox Jews. We also try to advance humanitarian causes and treatment for Jews in the judicial system.

FILED

APR 03 2020

APPELLATE CLERK'S OFFICE
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We have learned of a transcript of an argument about bond in this case, where a lawyer for the State of Connecticut argued that "many . . . Orthodox Jews who have been accused of crimes flee to Israel". Our organization has a strong interest in opposing stereotypical statements like this regarding all Jews, including Orthodox.

B. Reasons Why Applicant Should be Permitted to File Amicus Brief

The Beis Din Tzedek of Lakewood has an interest in the outcome of this bond pending appeal motion for two main reasons. The first is trying to prevent stereotypes about Jews, particularly Orthodox Jews, from playing any part in the justice system. We believe we could offer helpful expertise to the Honourable Court about challenges faced by Orthodox Jews, and the difficulty of avoiding stereotypes and possible discrimination.

Second, we have learned from researching this case that Rabbi Daniel Greer is elderly and in poor health. Our organization is very concerned about an elderly inmate being incarcerated during the health emergency we are all now struggling with. Passover is approaching very soon and our organization believes strongly that if an alternative like home monitoring or house arrest is available, an Orthodox Rabbi like Rabbi Daniel should be allowed to observe this religious period at home.

We respectfully submit that our history and expertise within the Orthodox Jewish community would be a benefit to the Honourable Court and help decide the important issues before it.

III. LEGAL GROUNDS RELIED UPON

This Court has the power to permit the filing of a *amicus* brief under Rule 67-7 of the Rules of Practice.

IV. CONCLUSION

For these reasons we respectfully petition this Honourable Court to grant this Application and allow the Beis Din Tzedek of Lakewood Inc. to file a brief as *amicus curiae* in support of Defendant-Appellant Rabbi Daniel Greer.

BEIS DIN TZEDEK OF LAKEWOOD INC.

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By: 
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בס"ד

CERTIFICATION

Pursuant to Section 62-7 of the Practice Book, the undersigned hereby certifies that on March 30th 2020 a copy of this document was delivered to counsel of record listed below by email or regular first-class mail to:

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