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APPELLATE COURT
OF THE
STATE OF CONNECTICUT

AC 49708

CHIEF DISCIPLINARY COUNSEL
Plaintiff-Appellee
VS.

DRESSLER, LAWRENCE
Defendant-Appellant

BRIEF OF THE DEFENDANT-APPELLANT LAWRENCE DRESSLER

DEFENDANT-APPELLANT,
LAWRENCE DRESSLER

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STATEMENT OF THE ISSUES

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1. Did the Trial Court err in accepting the findings of the Hartford Standing Committee?.....16-38

STATEMENT OF FACTS

Mr. Dressler pleaded guilty to a federal mortgage fraud conspiracy charge arising from six real estate closings he handled in 2007 and one in 2008. He accepted responsibility for his conduct, received sentencing credit for accepting responsibility, and was released early from federal prison based on good behavior. Mr. Dressler derived no improper financial benefit from these transactions beyond ordinary and customary legal fees.

Following his release from prison in 2015, Mr. Dressler was appointed conservator by Probate Judge John Keyes for an elderly World War II veteran and Jewish war hero, an appointment that would have been unavailable in many jurisdictions because of Mr. Dressler's felony conviction. Mr. Dressler cared for him until his passing at the age of ninety-nine, remaining at his bedside and reciting Psalms in his final moments. Judge Keyes submitted a character letter on Mr. Dressler's behalf, as did Attorney Willie Dow, who represented the ringleader in Mr. Dressler's conspiracy. In his letter, Attorney Dow stated that Mr. Dressler's role in the conspiracy was "ministerial." (Docket Entry no's 191.55, 195.00).

In 2019, Mr. Dressler devoted substantial time assisting New Haven State's Attorney Maxine Wilensky in the prosecution of the politically influential pedophile clergyman, ie., Rabbi Daniel Greer, which resulted in a conviction. See State v. Greer, No. CR17-177934 (Clerk Appendix page 289-290, 476; Docket Entry 126.00; Docket entry 191.09, p. 49-52, 86; Docket Entry 191.06, p. 49-52). Mr. Dressler's involvement was sufficiently significant that he remained in communication with the State's Attorney's Office following the conviction, including with prosecutors who assumed responsibility for post-conviction proceedings after Wilensky retired. Those prosecutors consulted with Mr. Dressler regarding issues in the Greer matter during the same period that his readmission proceedings were pending. Mr. Dressler was prepared to testify in Daniel Greer v. State of Connecticut, CV23-6129032-S, scheduled for December 2025, until the

State elected to release Mr. Greer from incarceration rather than proceed to a trial that could have subjected the State's Attorney's Office to public scrutiny and embarrassment.

Beginning in or about 2020, Mr. Dressler repeatedly requested that State's Attorney Wilensky provide a character letter in support of his readmission application. Although she initially engaged with those requests, she ultimately advised that "the State wouldn't let her" provide such a letter. The basis for that position was not explained. (Clerk Appendix page 289-290, 476).

First Amendment / Petition Clause Issues

Mr. Dressler appeared twice before the Fairfield County Standing Committee. Mr. Dressler was repeatedly subjected to ad hominem attacks directed at the content of his blog. Reports submitted by the Statewide Grievance Committee ("SGC") and the Office of Chief Disciplinary Counsel ("OCDC") likewise focused heavily on the blog's content. This focus persisted long after the Hartford Standing Committee filed its report in April 2025. In September 2025, Mr. Friedle, the Chairman of the Hartford County Standing Committee, notified the SGC that he had located Mr. Dressler's blog on the internet and expressed concern about it. (Docket Entry 205.00).

The First Amendment implications of Mr. Dressler's blog were raised during the Hartford Standing Committee's afternoon hearing. (Entry 198.00, pp. 22–23). Mr. Dressler likewise addressed this issue in his objection to the Fairfield County recommendation, noting that the free press serves as the 'Fourth Estate,' a check on governmental power, and that journalists routinely investigate and scrutinize the actions of lawyers, prosecutors, judges, and other public officials. (Entry 167.00, p. 22).

Mr. Dressler withdrew his first application before the Fairfield County Standing Committee upon the advice of former SGC counsel and former New Haven Corporation Counsel Pat King, who told Mr. Dressler's attorney that based

on the tenor of the proceedings the forthcoming report would be negative and would be used against him in subsequent proceedings, functioning much like an employer's effort to build a record of alleged misconduct to justify an adverse employment action. (Clerk's Appendix at page 462). At the hearing on the second application, Committee member Doug Mahoney expressed anger towards the SGC for "allowing" Mr. Dressler to withdraw his first application. The Fairfield County Standing Committee issued a lengthy report which was objected to by Mr. Dressler. (Clerk's Appendix 278-301). Judge Abrams, of the three Judge panel, ultimately denied the application. (Clerk's Appendix, p. 246-247).

The Fairfield and Hartford Standing Committees, and the SGC, repeatedly focused on whether the public might confuse the character "Larry Noodles" with the individual Lawrence Dressler. Journalist Paul Bass, who testified as a character witness for Mr. Dressler before the Fairfield County Standing Committee, was asked whether the public would confuse Larry Noodles with Lawrence Dressler. Mr. Bass laughed in response and asked the Committee whether they would have difficulty confusing Jon Stewart the comedian with Jon Stewart the private individual. Before the Hartford County Standing Committee Mr. Friedle pressed Mr. Dressler: "You just said it was a fictional character and here you said it was you. What is it? What's the truth? You were Larry Noodles, weren't you?" (Docket Entry 201.00, pp. 21–22; Entry 198.00, p. 31; Entry 191.09 p.69-70, 82).

Following Judge Abrams's decision, Mr. Dressler removed his blog from the internet and, rather than pursue an appeal, complied with the applicable one year waiting period before submitting a third application for readmission. Despite these efforts, the SGC reported before the Hartford County Standing Committee that the blog had not been "completely removed," noting that while the website no longer contained content, it appeared to be "under maintenance." In response, Mr. Dressler took additional steps to eliminate any remaining online presence

associated with the blog, ultimately rendering the site entirely inaccessible. Notwithstanding these remedial actions, the SGC continued to focus on the blog's prior existence.

Disparate Treatment

Mr. Dressler's co-defendant in his criminal case, Genevieve Salvatore, who pleaded guilty to twice as many closings as Mr. Dressler, appeared before many of the same members of the Fairfield County Standing Committee with many of the same attorneys from the SGC and the OCDC. Ms. Salvatore was granted readmission without difficulty. Ms. Salvatore had a pending foreclosure proceeding during her hearing before the Fairfield County Standing Committee on 6/20/23, which Mr. Dressler raised before the Hartford County Standing Committee (Entry No. 191.51, p. 5). SGC Counsel argued before the Standing Committee: "Counsel has concerns and reservations regarding Genevieve Salvatore's application for reinstatement… her failure to review, complete, and fully update her application; her failure to complete the MCLE credits and fill out the forms correctly; her failure to list companies where she was or is a member or manager; her failure to list all civil litigation; her failure to list tax liens on property; and her lack of sincere acceptance of wrongdoing…" (Exhibit E to Docket Entry 191.51); Citibank v. Genevieve Salvatore, JD Milford, CV23-6052078.

Another co-defendant, Jeffrey Weisman, appeared before many of the same Fairfield County Standing Committee members with many of the same attorneys representing the SGC and OCDC. Mr. Weisman was also granted readmission with little difficulty, notwithstanding the fact that his criminal liability far exceeded Mr. Dressler's and Ms. Salvatore's. Mr. Weisman also acknowledged that he had recently recovered from gambling, drug, and alcohol addictions. Mr. Weisman, like Ms. Salvatore, made numerous corrections, updates, and amendments to his filings before the Committee, including

proposing two separate practice mentors, comparable to those attributed to Mr. Dressler in his proceedings. Chief Disciplinary Counsel v. Jeffrey Weisman, CV13-6045715S.

Technical and Procedural Errors & Delays

The Hartford County Standing Committee issued its final report in April 2025 after substantial delays in the proceedings. Many of these delays stemmed from the repeated mishandling of the record and exhibits by Committee counsel Gary Friedle, despite the fact that Mr. Friedle was admitted to the practice of law in Connecticut in 1964.

It took Mr. Friedle more than four months to file exhibits associated with the report. When they were eventually filed, the exhibits contained numerous errors that required correction and refiling. (Clerk's Appendix, p. 503). Mr. Friedle did not file transcripts of the 2024 Hartford proceedings until September 25, 2025, more than five months after the report was filed and nearly a year after the transcripts had been prepared by the court reporter. Mr. Friedle acknowledged that he lacked the technical capability to upload the transcripts and exhibits to the Judicial Branch system and instead left hard copies at the clerk's office for filing. (Docket Entries 202.00, 207.00). Those materials remained in the Waterbury Clerk's Office for months without being docketed, while Mr. Friedle did not appear to follow up regarding their status.

The filing process was further complicated by repeated technical and procedural malfunctions on the part of Mr. Friedle. Mr. Friedle was unable to attend a Teams conference addressing errors in the exhibit compilation due to "technical difficulties" with his webcam. (Docket Entry 203.00). He repeatedly said that he had forwarded exhibits to Mr. Dressler's counsel when he had not, resulting in Mr. Dressler requesting that a scheduled hearing be continued. (Docket Entry 204.00). Mr. Friedle also misfiled character letter exhibits, which Mr. Dressler had brought to his attention, which required further refiling. (Entry

208.00, p. 2). Mr. Friedle later acknowledged that he had mistakenly attempted to file exhibits through the incorrect portal on the Judicial Branch website. (Entry 205.00).

When questioned by SGC counsel about the missing October 9th transcripts, Mr. Friedle responded that he did not recall whether they had been filed and suggested that counsel "check with attorney Ferraro at the Waterbury Superior Court." (Entry 207.00). When those transcripts were eventually filed, they were significantly redacted and had to be corrected. Mr. Friedle referred to these redacted transcripts as "bifurcated transcripts." (Entry 207.00).

Further irregularities occurred after the Hartford report was filed. The SGC moved to correct and supplement the record approximately seven months after the report had already been submitted. (Clerk's Appendix, pages 441, 459, 503). These errors were initially identified by Mr. Dressler. Meanwhile, the Judicial Branch took nearly six months to assign the matter to a three-judge panel and schedule a hearing. The assignment occurred one day after Mr. Dressler advised the Federal Grievance Committee that his State readmission application had been languishing on the state docket for many months. Mr. Dressler is seeking the restoration of his Federal Bar license despite not being readmitted to the State Bar.

The "16 Grievances"

In a report dated October 20, 2020, the SGC / OCDC noted that, over the course of many years, Mr. Dressler had filed eight grievances against other attorneys and had been the subject of eight grievances himself, most of which were dismissed. (Entry No. 139.00). Most of these grievances were not filed with the SGC / OCDC reports, nor were they subsequently made part of the record before either the Fairfield County or Hartford County Standing Committees. Mr. Dressler was never provided with copies of all sixteen grievances during the Fairfield County Standing Committee hearings, nor during the Hartford County

Standing Committee hearing. (Clerk's Appendix pages 252, 278). In a memorandum addressing the Fairfield County Standing Committee's report, Mr. Dressler explained, to the best of his recollection, the nature of the 16 grievances. (Clerk's Appendix p. 278). Neither the SGC, OCDC nor the three-judge panel addressed or otherwise responded to Mr. Dressler's memorandum explaining the nature and circumstances of these grievances.

At the final hearing on February 27, 2025, Mr. Friedle demanded that Mr. Dressler explain "the 16 grievances that were listed in your application that you filed, eight by you and eight against you." (Docket Entry no. 199.00, page 18). Mr. Dressler's multiple applications, however, never listed sixteen grievances. The Standing Committee's report subsequently faulted Mr. Dressler for failing to be "fully prepared to discuss the substance of the 16 grievances filed by and against the Applicant." (Clerk's Appendix, page 450).

Practice Plan and the "8 Exhibits"

The Hartford Standing Committee criticized Mr. Dressler for submitting "three practice plans." (Clerk's Appendix, page 448). Mr. Dressler explained that one of those filings was a draft practice plan mistakenly submitted by attorney James Sullivan under Sullivan's own juris number rather than through Mr. Dressler's login credentials. The SGC never disputed the fact that this draft practice plan was submitted by Mr. Sullivan. Moreover, the differences between the remaining plans were not substantive, and revisions to practice plans are common in readmission proceedings.

On November 16, 2024, Mr. Dressler provided eight exhibits to the SGC and Mr. Friedle via email for filing. (Entries 216.00–223.00, 227.00). After discussions between the parties, a Teams meeting was held on January 14, 2025. (Entry 229.00). Mr. Friedle was unable to attend due to technical difficulties, but advised the parties to proceed without him. During that meeting, and in a follow up email, SGC counsel Villar labeled the exhibits collectively as "Exhibit E" and

confirmed that they had been filed and a copy of the Exhibits were "CC'd" to Mr. Friedle in an email. (Entry 230.00). .

Unresolved Issues and Ex Parte Communications

Mr. Dressler requested that he be provided with "ex-parte communications as well as complete transcripts of all proceedings in this case, as well as all related exhibits, reports, documents, and other such materials not disclosed to Mr. Dressler, including ex-parte communications, the complete content of all SGC / OCDC investigations, records, emails, reports and other such materials relating to the Defendant involving the SGC, the OCDC, James Sullivan, individual members of the Standing Committees and the Connecticut Department of Criminal Justice." (Clerk's Appendix, p. 495). Mr. Dressler raised these issues again at oral argument before the three Judge Panel.

Mr. Dressler requested access to the original recordings of the proceedings to determine whether additional transcript redactions existed and to address issues raised in Docket Entry 213.00 regarding the presence of Mr. Nolan at the hearing. (Transcript of three Judge panel hearing, p. 5). The panel did not address these issues.

The panel did not address several conflict-related issues raised by Mr. Dressler, including the relationship between State's Attorney Maxine Wilensky and Mr. Dressler, the participation of a New Haven State's Attorney on the Hartford Standing Committee, the issue of former SGC member Suzanne Sutton referring Mr. Dressler to Attorney Sullivan due to his "connections" with the Hartford Standing Committee, or the issue of Mr. Sullivan advising Mr. Dressler that all that mattered with the Hartford Standing Committee were personal connections. (Docket Entry 201.00). Judge Abrams never addressed similar conflict of interest issues raised by Mr. Dressler concerning prior contacts with members of the Fairfield County Standing Committee, such as Doug Mahoney and Cindy Robinson, and CT State's Attorney Kevin Dunn (the husband of the

Chairperson Kathleen Dunn), who discussed the details of Mr. Dressler's case with Mr. Dressler's attorney George D'Amico at the time of the hearing. (Clerk's Appendix p. 307-308).

After the hearing before the three Judge panel, on 1/22/26, the Superior Court clerk requested whether the motion filed by Mr. Dressler in docket entry 224.00 should be heard by the three Judge panel, the Standing Committee or by a Superior Court Judge. Counsel for the SGC, OCDC, and Mr. Friedle all argued that the motion should be heard by the three Judge panel. Mr. Dressler responded with the following email: "PB 2-53 would appear to give the Superior Court authority over administrative and procedural matters such as the referral to the Standing Committee and the appointment of the three Judge Panel. I would argue that PB 2-53 gives the Superior Court jurisdiction over the issue of whether the parties have complied with the provisions of the Practice Book. PB 2-53 would appear to limit the role of the three Judge panel to deciding whether the application should be granted. See Statewide Grievance Committee v. Rozbicki, 211 Conn. 232, 238 (1989)." The Clerk never responded to the parties' emails, nor did any Superior Court Judge ever address this issue.

The Clerk never scheduled a hearing to address Mr. Dressler's motion filed on 11/12/25 (Docket Entry 201.00) nor was a hearing scheduled to address Mr. Dressler's Motion for Order filed on 12/16/25 (Docket entry 224.00). The three Judge panel did address Mr. Dressler's Motion filed on 11/26/25 and denied said motion. (Clerk's Appendix p. 527, 552).

ARGUMENT

I THE TRIAL COURT COMMITTED REVERSIBLE ERROR IN ACCEPTING THE FINDINGS OF THE STANDING COMMITTEE

A. Mr. Dressler's Suspension has lasted for an Unreasonable Period of Time

"We reserve for another day therefore the resolution of grievance procedure delays that are so prejudicial that they implicate the due process rights of an

attorney charged with professional misconduct." Statewide Grievance Committee v. Rozbicki, 211 Conn. 232 (1989) (footnote 6).

Mr. Dressler's suspension has lasted for an unreasonable period of time and has effectively become permanent disbarment. Connecticut law recognizes that a suspension "need not be permanent or total." In the Matter of Presnick, 19 Conn. App. 340, 349 (1989). Yet the repeated denial of Mr. Dressler's readmission application, over the course of many years, has converted what was intended to be a temporary disciplinary measure into a de facto permanent exclusion from the practice of law.

The disparate treatment of similarly situated applicants underscores the due process concerns presented by this case. Attorneys Genevieve Salvatore and Jeffrey Weisman appeared before substantially the same Standing Committee members and were evaluated by the same SGC and OCDC personnel. Both attorneys were recommended for reinstatement and were readmitted without substantial difficulty or lengthy delays. Both attorneys listed employment in paralegal-type capacities on their applications, yet the Standing Committee demanded that Mr. Dressler seek permission to work as a paralegal before his application could proceed, while imposing no similar requirement on Ms. Salvatore or Mr. Weisman. This demand was particularly improper because the applicable Practice Book provision governing paralegal employment did not apply to Mr. Dressler, as it was not retroactive, and SGC counsel advised Mr. Friedle of that fact. Nevertheless, Mr. Friedle refused to follow the Practice Book and stated in an email to the SGC: "I understand that the Practice Book does not prohibit him, but in your first report, you indicated that it did not apply to him. We disagree. I am going to advise Mr. Dressler that he must comply with the Practice Book regulation…" (Docket Entry 206.00). To avoid further delay in his reinstatement proceedings, Mr. Dressler offered to resign from his paralegal position rather than prolong the matter by

seeking unnecessary Superior Court approval. Mr. Friedle never responded to that offer.

The Connecticut Judicial Branch has formally acknowledged the importance of managing public perception and media relations. The Judicial Branch's website discloses a public-relations initiative that includes "monitor inquiries from the news media and stories about the Branch," "market positive stories about the judiciary and the Branch to news organizations" and "contact editorial boards when necessary to present the Branch's position on an issue." *Phase 4 of the Implementation Report of the Strategic Plan* page 63 Judicial website. Said public relations initiative was developed in response to "The economic collapse of 2007 and 2008... while the Judicial Branch's budget represents only 2.52 percent of the state budget, we were asked to absorb cuts of nearly three times that amount while still providing the same level of services to the public." *Public Service and Trust Commission Strategic Plan - Five Year Update*, page 1, Judicial website.

Granting Mr. Dressler's appeal, after years of litigation and adverse rulings, would effectively require reversal of decisions issued by multiple Superior Court judges and numerous Standing Committee members. Such an outcome could reasonably be expected to generate public and media scrutiny. When a judicial system simultaneously maintains a focus on managing public perception, freely exercising its own First Amendment rights, and denies reinstatement to an applicant whose speech was critical of the judiciary, the appearance of viewpoint-based decision-making becomes difficult to ignore.

The tenor of the hearings lacked basic respect and decorum. Committee members frequently raised their voices and repeatedly berated Mr. Dressler regarding the content of his writings. The SGC / OCDC even berated Mr. Dressler for invoking his Fifth Amendment right against self-incrimination when Mr. Dressler took the Fifth Amendment to defend himself against unfounded allegations of witness tampering by Mr. Greer. (Docket Entry 197.00, p. 62)

The Statewide Grievance Committee also subjected Mr. Dressler's proposed mentors, with impeccable reputations, to unwarranted personal attack. Before the Fairfield County Standing Committee, in 2020, Assistant New Haven Corporation Counsel Joseph Merly was faulted for allegedly failing to properly close Mr. Dressler's accounts while serving as trustee at the time of the 2014 suspension, even though the SGC / OCDC had previously approved his final report. The Committee further questioned whether Mr. Merly's purported "friendship" with Mr. Dressler would compromise his ability to serve as a mentor. (Docket Entry 191.06, p. 60)

In 2024, Mr. Dressler's proposed mentor, Attorney Paul Carty, was similarly criticized by the SGC / OCDC based on thirty-nine grievances filed against him over more than forty years of criminal defense practice, even though all those grievances had been dismissed. This level of scrutiny was particularly unwarranted given that Judge Fisher's original suspension order required only that Mr. Dressler's mentor be a "member in good standing" of the Connecticut Bar.

Counsel for the SGC acknowledged the contentious nature of the Standing Committee proceedings. SGC counsel Elizabeth Rowe later contacted Mr. Dressler seeking information regarding his co-defendant Jeffrey Weisman and apologized to Mr. Dressler for her treatment of Mr. Dressler during the first hearing. Mr. Dressler raised Ms. Rowe's apology both during the subsequent Fairfield County hearing and in court filings, which was never denied by the SGC, Ms. Rowe or the OCDC. (Docket Entry 191.06, p. 32-33)

B. This case does not Present an Unpreserved Constitutional Claim.

An unpreserved claim may be reviewed under *Golding* if the claim is constitutional in nature and if there is an adequate record for review. State v. Thurman, 10 Conn. App. 302, 306, 523 A.2d 891, cert. denied, 204 Conn. 805, 528 A.2d 1152 (1987).

This case does not present an unpreserved constitutional claim. Mr. Dressler repeatedly raised and briefed his First Amendment arguments throughout the proceedings. The Connecticut State Constitution offers broader First Amendment rights "than its federal counterpart." State v. Haralambos Sidiropoulos, 237 Conn. App. 262, 296. 395 (2026) ("We conclude that the record is adequate for review of the defendant's claim that the Connecticut constitution protects 'offensive language' and that the defendant has presented a claim of constitutional magnitude… Our state constitution offers language, i.e., `remonstrance,' that sets forth free speech rights more emphatically than its federal counterpart.... we are convinced, therefore, that our constitution's speech provisions reflect a unique historical experience and a move toward enhanced civil liberties, particularly those liberties designed to foster individuality… This historical background indicates that the framers of our constitution contemplated vibrant public speech, and a minimum of governmental interference.").

The record demonstrates that the disciplinary authorities repeatedly focused on the content of Mr. Dressler's blog and faulted him for maintaining it and failing to remove archived copies of the blog from third-party websites, even though he had not been specifically directed to do so, and such a requirement would raise First Amendment concerns. The Committee admitted portions of Mr. Dressler's blog into evidence (Entry 191.11). Mr. Friedle continued to focus on the content of that blog long after issuing his report. (Docket Entry 205.00). This continued focus raises substantial questions as to whether the Hartford Standing Committee developed a personal interest in the content of Mr. Dressler's speech that compromised its ability to function as an impartial fact finder.

The disciplinary authorities repeatedly focused on the content of Mr. Dressler's blog, particularly as it related to the politically influential Rabbi Daniel Greer, who was a central subject of that commentary: "Can you explain why you didn't give that same Constitutional guarantee to Daniel Greer when you publicly

refer to him as a child rapist and a pedophile prior to any conviction in your blog of August 18, 2019?" (Docket Entry No. 191.07, p. 44). The disciplinary authorities repeatedly suggested that the public would confuse the obviously satirical character "Larry Noodles" with the individual Lawrence Dressler, while completely disregarding the First Amendment implications of treating protected satire, political speech, opinion and commentary as evidence of moral "unfitness." (Entry 201.00, pp. 21–22; Entry 198.00, p. 31).

The three-judge panel concluded that "the Hartford Standing Committee found that the applicant failed to adequately recognize the significance of the damage his blog posed to the integrity of the profession," without addressing whether the statements constituted satire or protected expressive commentary. (Clerk's Appendix, p. 550). See Moore v. Cohen, 548 F. Supp. 3d 330, 348 (SDNY 2021, affirmed by 2nd Cir.) ("...In light of the context of Judge Moore's interview, the segment was clearly a joke and no reasonable viewer would have seen it otherwise… parody and satire are deserving of substantial freedom both as entertainment and as a form of social and literary criticism.... Humor is an important medium of legitimate expression and central to the well-being of individuals, society, and their government…"). Mr. Dressler repeatedly explained in memorandum and at hearings that his blog was "tongue in cheek," "slang" and "obviously a joke." (Docket Entry 191.06, p. 38, 45; Entry 191.07, p 46; Entry 191.09, p. 66, 86; Entry 201.00, p. 20)

A substantial portion of the content of Mr. Dressler's blog was clearly a form of "Jewish humor" grounded in irony, exaggeration, and satire rather than literal factual assertion, which Mr. Dressler touched upon in his court filings. (Entry 201.00, p. 20-22 Entry 167, p. 6-7). As commonly described, Jewish humor frequently consists of "wordplay, irony, and satire," often reflecting anti-authoritarian themes and in-group self-reflection. See *Jewish Humor*, Wikipedia. No "reasonable viewer" would have understood the blog as anything other than

rhetorical commentary, parody, or satirical expression. Id. Yet the Fairfield County Standing Committee, in its report, which was relied upon by the Hartford County Standing Committee, characterized Mr. Dressler's statements about "race, religion and gender" as "inflammatory" and quoted selected portions of the blog, despite the fact that the postings had been published approximately seven years earlier. (Docket Entry 161.00, page 8-9).

Far from being "inflammatory" Mr. Dressler addressed the satirical nature of his blog in his memorandum addressed to Judge Abrams, and further explained in the context of his collaboration with professional Jewish ghostwriter Jonathan Gelertner and submitted Mr. Gelertner's character letter to the Fairfield County Standing Committee. Mr. Gelertner explained that he was drawn to Mr. Dressler's work because of "the irony of his voice and the rawness of his subject matter," and compared it to the Odessa stories of Russian-Jewish writer Isaac Babel. (Docket Entry 167.00, p. 20; Exhibit No. 11, entered 6/14/22, Exhibit portal of judicial website). The tenor and focus of the readmission proceedings, however, effectively caused Mr. Dressler to self-censor, ie., refrain from pursuing a proposed book project with Mr. Gelertner out of concern that it could later be used against him in future reinstatement proceedings.

The constitutional guarantee of free expression exists precisely to protect speech that is controversial, unsettling, critical of authority, or offensive to some listeners, rather than only speech that is widely accepted or uncontroversial. Measured against the rhetoric commonly employed in public legal discourse, Mr. Dressler's statements were hardly extraordinary. Members of the United States Supreme Court themselves routinely employ sharp, highly charged and even "inflammatory" language in judicial opinions and public commentary. See Trump v. CASA, Inc. 145 S. Ct. 1917 (2025) (Jackson, J.: "Eventually, executive power will become completely uncontainable, and our beloved constitutional Republic will be no more… This Court's complicity in the creation of a culture of disdain

for lower courts, their rulings, and the law … will surely hasten the downfall of our governing institutions, enabling our collective demise.”); See also Callais v. Louisiana, 608 U. S. ____ (2025) (Alito, J.: “The dissent goes on to claim that our decision represents an unprincipled use of power…That is a groundless and utterly irresponsible charge… The dissent accuses the Court of ‘unshackling’ itself from ‘constraints.’ It is the dissent’s rhetoric that lacks restraint.” 5/4/26 Application to Issue the Judgment Forthwith). Justice Sotomayor recently publicly referred to Justice Kavanaugh in the following manner: “This is from a man whose parents were professionals and probably doesn’t really know any person who works by the hour or the piece like I do.” *New York Times*, 4/15/26.

Mr. Dressler repeatedly raised and briefed the First Amendment implications of these proceedings in pleadings filed with the Superior Court, notwithstanding his stated reluctance to “antagonize” the Hartford Standing Committee. (Docket Entry 191.07, p. 45). The First Amendment issue has repeatedly been ignored and treated with disdain. Indeed, the constitutional concerns were sufficiently significant that Hartford County Committee member Richard Brown expressly invoked the First Amendment in his dissent. Mr. Dressler advised the Fairfield County Standing Committee that his criticisms of the legal system were comparatively restrained, citing, for example, the highly critical views expressed by Federal District Judge Jed Rakoff in his book, *Why the Innocent Plead Guilty and the Guilty Go Free*, excerpts of which Mr. Dressler submitted. (Docket Entry 167.00, pp. 8–9; Exhibit 12, filed 6/15/22 on exhibit portal). In addition, Mr. Dressler submitted numerous exhibits addressing what he characterized as infringements on his free speech rights by members of the Connecticut Bar, judicial misconduct he reported resulting in a public apology, and news articles describing prominent attorneys who sharply criticized the United States Attorney General. (See Docket Entries 127.00–129.00, 135.00–138.00).

It was unreasonable to shift the burden to Mr. Dressler, or his attorney James Sullivan, an expert in Connecticut legal ethics, to instruct the Hartford Standing Committee on how to address constitutional and legal issues during fact-finding hearings, particularly where the Committee is presumed to possess expertise in these matters. (Other than Richard Brown, it does not appear that members of the standing Committees possessed expertise in First Amendment jurisprudence.) Such an expectation is unwarranted given the record demonstrated that Mr. Dressler has been repeatedly treated with hostility and contempt. Under these circumstances, Mr. Dressler's reluctance to further "antagonize" the Committee by challenging the Committee on Constitutional issues was both understandable and reasonable.

Judge Abrams' decision relied in part on Mr. Dressler's "blog posts" and the "filing of several lawsuits as a pro se party [which] stand in stark contrast to the statement of personal responsibility that he made at his sentencing hearing." (Entry No. 145.50). The record, however, does not support that characterization. The Fairfield County Standing Committee questioned Mr. Dressler about a lawsuit filed pro se, ie., Dressler v. Riccio, 205 Conn. App. 533 (2021). Neither the Fairfield County Standing Committee's report nor Judge Abrams' memorandum identified any additional "lawsuits" filed by Mr. Dressler, rendering unclear what other litigation, if any, formed the basis of the court's conclusion.

Judge Abrams did not engage with the First Amendment arguments raised by Mr. Dressler, nor address any specific blog posts, nor consider Mr. Dressler's right "to petition the Government for a redress of grievances," among the most fundamental liberties safeguarded by the Bill of Rights. See Lozman v. City of Riviera Beach, 585 U.S. 87 (2018). By characterizing protected petitioning activity as evidence of deficient "present fitness" to practice law, without identifying the underlying litigation, Judge Abrams' decision raised serious concerns that Mr. Dressler was penalized for conduct squarely protected by the First Amendment. Such an omission has a chilling effect on the First Amendment

rights of others in the legal profession, as well as members of the public who seek redress before Connecticut Courts for First Amendment violations.

The record contains no evidence that any blog posting caused "damage to the integrity of the legal profession" or resulted in "prejudice to an identifiable proceeding," such that it would bear some relationship to recent case law addressing attorney speech. The Rules of Professional Conduct governing attorney speech are grounded in the attorney-client relationship. Mr. Dressler's blog postings implicated neither. See In the Matter of Knudsen, 582 P.3d 87, 2025 MT 304 ¶ 107, 122, 123 (Montana Supreme Court 2025: "Generally referencing judicial misconduct, judicial misbehavior, or inappropriate judicial behavior is hyperbole. Some may define those terms as any deviation from the highest ideals. Others may define those terms as significant departure from minimum standards... the reference is a colorful paraphrase of the term single-minded which does not impugn integrity... Other state appellate courts persuasively have required prejudice to an identifiable proceeding, as an element of a Rule 8.4(d) violation… There needs to be a limit to Rule 8.4(d)'s otherwise extremely broad scope. Therefore, we hold prejudice to an identifiable proceeding is an element of a Rule 8.4(d) violation."); Mills v. Statewide Grievance Committee SC 21090 (CT Supreme Ct. 2026) (Dissenting Opinion: "Allegations that judicial decisions are legally incorrect, devoid of meaningful jurisprudence, and in disregard of the rules and the law 'are the staple of appellate briefs, and cannot without more constitute ethical violations…"); In the Matter of Discipline of Maridon, No. 85606 (Nevada Supreme Court 2023: "While 'in the past, professional restrictions on lawyer criticism of judges were sometimes worded or applied broadly' on the justification that 'too severe criticism could undermine public confidence in the judicial system,' that application has since shifted, as neither such broad restrictions nor such a justification can withstand scrutiny under the First Amendment… Without a supported finding that Maridon made

statements of fact that he either knew to be false or stated with reckless disregard for the truth, the panel's conclusion that Maridon violated RPC 8.2(a) cannot stand regardless of our disagreement with Maridon's tone and choice of words."); State Ex Rel Oklahoma Bar Association v. Porter, 766 P2d 958, 970 (1988) ("Remarks of the sort being now considered are indeed disrespectful, exhibiting a definite lack of the polish expected of the true professional and they remain uncondoned... We view the remarks here examined to be extremely bad form while in the same breath we hold them to be protected.").

By upholding the reprimand of a lawyer for his criticism of judges' orders, the Mills decision, as well as the repeated denials of reinstatement in this case, as well as the overly harsh disciplinary actions against Ms. Smalls-Miller and Mr. Mills, signals to members of the Bar that criticism of the judiciary will subject them to professional sanctions, despite the fact that the Connecticut Constitution affords broader free speech protections "than its federal counterpart." State v. Haralambos Sidiropoulos, 237 Conn. App. 262 (2026). Such a result is contrary to the profession's own stated principles: "The profession has a responsibility to assure that its regulations are conceived in the public interest and not in furtherance of parochial or self-interested concerns of the bar." Preamble, CT Rules of Professional Conduct (2026).

In Mills, SGC counsel Mr. Staines sought a suspension rather than a reprimand of Mr. Mills, a harsh and disproportionate sanction given his nearly unblemished 30-year disciplinary record. Mr. Mills was reported to disciplinary authorities by Fairfield County Standing Committee member Doug Mahoney and Superior Court Judge Barbara Bellis, whose referrals initiated the disciplinary process. By contrast, Attorney Norm Pattis publicly criticized Judge Bellis in significantly more direct and personal terms than Mr. Dressler or Mr. Mills for that matter, following her order suspending his law license in Erica Lafferty v. Alex Jones, No. CV18-6046436-S, which for the most part was quickly

overturned by the Connecticut Appellate Court. Attorney Pattis published the following statements on his blog, which remain publicly available: "my law license was suspended for six months by the same Connecticut judge who presided over the judicial train wreck involving Alex Jones… The judge is stunned by my misconduct. Me, I am stunned the state trusts her with a robe and a gavel. Folks are afraid of this judge, and not for good reason. Why would the judge do this? I think Emerson teaches why: 'When you strike at a king, you must kill him.' The same, apparently, applied to queens… We're preparing to appeal the $1.5 billion default judgment against Jones, a case we believe this judge butchered with her rulings. She got her revenge."
https://www.pattisblog.com/blog/general/license-restored-for-now/

Mr. Dressler cited these statements in his Objection to the Committee Report (Clerk Appendix, page 462), contending that Attorney Pattis' remarks were at least as critical as the statements attributed to Mr. Dressler, or Mr. Mills for that matter. Yet, despite the public and pointed nature of these comments, notwithstanding Mr. Dressler's citation to them in pleadings filed in this case, there is no indication that Attorney Pattis was subjected to disciplinary proceedings by members of the SGC, OCDC, the three Judge panel, or Judge Bellis. "A lawyer who knows that another lawyer has committed a violation of the Rules of Professional Conduct that raises a substantial question as to that lawyer's honesty, trustworthiness or fitness as a lawyer in other respects, shall inform the appropriate professional authority." Rule 8.3(a), Rules of Professional Conduct. The failure of disciplinary authorities to initiate a grievance against Attorney Pattis supports the conclusion that his comments did not "raise a substantial question" as to his fitness to practice law.

The disciplinary decisions in this case do not even approach the severity of the disciplinary proceedings imposed on civil rights Attorney Josephine Smalls-Miller, who has been notably outspoken in her public criticism of the Connecticut

Judiciary, going so far as to file Federal lawsuits and a CHRO complaint against the Judicial Branch. On March 18, 2026, United States District Judge Stefan R. Underhill declined to enter a reciprocal order of disbarment against Ms. Smalls-Miller, notwithstanding a disbarment ordered by Judge Barbara Bellis. In doing so, Judge Underhill observed: "Finally, the state court's disbarment of Miller seems more punitive than protective of the public. See *Statewide Grievance Committee v. Botwick*, 226 Conn. 299, 307 (1993) (holding attorney discipline is not intended to punish, but to safeguard the administration of justice and protect the public); *Office of Chief Disciplinary Counsel v. Cramer*, 2022 WL 6690150, at *5 (Conn. Super. Oct. 3, 2022) (holding a five-year disbarment was not warranted because the OCDC's position 'appeared to reflect punitive or retributive considerations')." In re Josephine Smalls Miller, 3:25-gp-00015 (SRU), Doc. No. 29, at 20 (D. Conn. Mar. 18, 2026). Mr. Dressler currently has an application for reinstatement to the Federal Bar pending before Judge Underhill. In re: Lawrence Dressler, 3:13-gp-27 (SRU).

This divergence of discipline reflects far more than a "mere difference of opinion over the technical niceties of judicial review of disciplinary decisions made by a reviewing committee." Mills (dissent). Rather, it demonstrates a fundamental disagreement regarding the proper scope of attorney discipline. The contrast is stark: a ten-year disbarment imposed in state court versus the federal court's decision to impose no reciprocal discipline whatsoever. The disciplinary process has strayed from its foundational purpose of protecting the public and has become a vehicle for punishing certain attorneys. "Even the mere 'appearance' of favoritism, founded or not, can undermine confidence in the integrity of the judiciary… 'Equal Justice Under Law' remains this Court's guiding light nearly a century after those words were first engraved there." Diamond Alternative Energy LLC, v. EPA 145 S. Ct. 2121, 2152, 606 US 100, 222 L. Ed. 2d 370 (2025) (Jackson, dissent).

If such an extreme divergence existed in employment-disciplinary actions, courts would not hesitate to scrutinize the disparity and safeguard the rights of the employee. The same principles of protection against harsh punishment should apply with equal force in attorney disciplinary proceedings, if not greater force, given that the judiciary is charged not only with regulating the conduct of attorneys, but also with protecting the rights of the public and maintaining confidence in the fairness and integrity of the legal system.

"The assumption that respect for the judiciary can be won by shielding judges from published criticism wrongly appraises the character of American public opinion… an enforced silence, however limited, solely in the name of preserving the dignity of the bench, would probably engender resentment, suspicion, and contempt much more than it would enhance respect." Standing Committee on Discipline of U.S. Dist. Court for Cent. Dist. of California v. Yagman, 55 F.3d 1430, 1445 (9th Cir. 1995) citing Bridges v. State, 314 U.S. 252, 270-271, 62 S. Ct. 190, 86 L.Ed. 192 (1941);

C This Case Presents Disparate Treatment of Similarly Situated Applicants

The record reflects a broad pattern of inconsistent disciplinary outcomes in the State of Connecticut. Attorneys with significant misconduct, including attorneys involved in numerous fraudulent closings, attorneys convicted of serious crimes, and attorneys disciplined for financial misconduct, have been readmitted to the practice of law. By contrast, some applicants have effectively received lifetime suspensions despite the nominal availability of reinstatement procedures. *'The End of the World': Small Missteps Carry Stiff Penalties in Attorney- Ethics Cases.* Connecticut Law Tribune (September 30, 2019).

For example, Attorney Louis Rubano, formerly of Lynch, Traub, Keefe & Errante, created two sets of settlement statements in hundreds of his personal injury lawsuits which resulted in the State of Connecticut and Medicaid (DAS) defrauded

of some $263,000, not accounting for losses in collections efforts and diversion of resources to investigate Mr. Rubano's fraud. The attorney for the State of Connecticut argued there were additional loss amounts that were unaccounted for and that Attorney Rubano engaged in fraudulent practices for over 20 years. OCDC v. Louis Rubano, NNH-CV19-6093890-S.

Judge Robaina stated in a character letter filed on Mr. Rubano's behalf: "I would ask you, Judge, to make the, specifically ask you, to make the punishment more symbolic than punitive at this point. He has paid a huge price, and he'll pay a huge price going on to the future. This is a unique situation. Unique in that there has not been theft in the traditional sense. You can argue that the people had not received the money that they should have, and that's correct, Judge, but there has not been theft. None of it has benefited Mr. Rubano personally. I found worse cases with less punishment and I'm sure you're aware of those cases. I found worse cases with different recommendations from the Disciplinary Counsel's Office… I don't know that there is a logical explanation for that, I understand the need for consistency and I understand the desire to be uniform, but Judge, people have done much worse things and received much less punishment than Mr. Rubano's going to take no matter what you do, and I think that point has to be made." Rubano was suspended for a period of nine months and returned to practice automatically at the conclusion of those nine months without having to appear before a Standing Committee. See also OCDC v. Maurizio D. Lancia CV12-6027678 (Reinstatement granted for attorney involved in massive mortgage fraud scheme) (See docket entry 134.00).

Despite Judge Robaina's statement that Mr. Rubano did not "benefit personally" from his "theft," Mr. Rubano's theft most likely conferred upon him a competitive advantage, enabling him to generate new personal injury clients in a field where attorneys commonly market themselves based on the monetary recoveries they secure for clients. Mr. Rubano recently settled a $45 million police

brutality personal injury case against the City of New Haven. See Richard Cox v. New Haven, 3:22-cv-01209, (D. Conn.).

The "present fitness" standard has been distorted by Connecticut disciplinary authorities beyond recognition, transformed into an open-ended scrutiny of decades-old matters, often prolonged through years of costly legal proceedings, reflecting a lack of compassion and unduly punitive treatment of members of the bar who have long since paid their debt to society. See OCDC v. Jerry Gruenbaum, No. CV15-6082913-S (During his second unsuccessful attempt at readmission, the applicant was questioned by Mr. Staines about a grievance dating back approximately four decades. As noted in dissent (Daniel J. Horgan): "The applicant had a few minor complaints levied by clients in the late 1980's when he was a young and inexperienced lawyer. Since then and up until 2015, he has had a clean record consisting of no grievances or malpractice claims filed. We can show some faith in the power of redemption by reinstating 70-year-old Jerry Gruenbaum's license to practice law. 'Second chances are not given to make things right, but to prove that we can be better even after we fall.'"

The practical effect of such proceedings is to extinguish an attorney's legally protected property interest in his law license without meaningful consideration of present fitness to practice law, while, paradoxically, granting readmission to attorneys with far more recent issues involving drug addiction, alcoholism, or gambling addiction, conditions that may present more immediate risks to the public. See Chief Disciplinary Counsel v. Jeffrey Weisman, CV13-6045715S; See also Chief Disciplinary Counsel v. Guy McDonough, CV13-6045715S (Corporate attorney recently recommended for reinstatement after three arrests for driving while intoxicated, subject to conditions including Alcoholics Anonymous meetings, mental health counseling, and random alcohol testing); See also OCDC v. Corey Brinson, CV16-6072340-S (African-American attorney and former U.S. Air Force National Guard member raised by a widowed mother in the North End

of Hartford and former associate at Day, Berry & Howard and Epstein Becker & Green in Washington, D.C., who obtained an advanced law degree, ie., L.L.M. during the pendency of his reinstatement proceedings and works as a pardon advocate serving the African-American community has been denied readmission no less than 3 times over the past five years and remains suspended.). See also OCDC v. Joseph Ganim (In his most recent unsuccessful reinstatement application in 2021, after demonstrating substantial rehabilitation, Mr. Ganim received more votes in favor of reinstatement from multiple members of the Hartford Standing Committee who voted against Mr. Dressler.)

These cases represent more than just an anomaly. Although relatively few reinstatement applications are filed each year, the record reflects a discernible pattern of disparate treatment among similarly situated applicants, resulting in a wide gulf in outcomes, from prompt reinstatement in some cases to prolonged, costly proceedings that amount in practice to de facto lifetime suspensions in others. This approach cannot be squared with Scott v. State Bar Examining Committee, 220 Conn. 812 (1992), where the Court made clear that present fitness must be evaluated in light of current circumstances, expressly recognizing that intervening changes may render past concerns obsolete. Id. at 832 n.12. What Scott framed as a forward-looking inquiry has been converted into a backward-looking inquest. If family courts assessed parental fitness by elevating conduct from decades past and imposed "de facto" lifetime terminations of parental rights, after years of legal proceedings, such an approach would be rejected. Yet in attorney disciplinary matters a standard that purports to measure "present" fitness has been stretched beyond its plain meaning to justify reliance on remote allegations, effectively rewriting the rule into one that looks backward indefinitely rather than assessing fitness as it exists today.

Mr. Dressler has demonstrated that CT United States District Judges Stefan R. Underhill and Alvin W. Thompson, CT Superior Court Judge Robaina, former SGC

and New Haven corporation counsel Pat King, former SGC counsel Suzanne Sutton, as well as Connecticut legal ethics expert James T. Sullivan, have each, in substance, recognized that "the opacity of the process undermines public confidence that disciplinary prosecutors exercise their discretion wisely rather than discriminatorily, and ultimately erodes confidence in the legal profession's system of self-regulation." *Selectively Disciplining Advocates*, Bruce Green, (Connecticut Law Review March 2022).

While judicial processes involve a degree of institutional opacity, that opacity becomes problematic when it fosters distrust in the fairness and legitimacy of the legal system. When proceedings appear arbitrary or punitive, confidence in the profession's system of self-regulation is undermined. The growing national concern over judicial transparency, including the increased scrutiny of emergency orders, ie., the so-called "shadow docket" of the United States Supreme Court, further illustrates the broader principle that justice must not only be done, but must be seen to be done.

D Mr. Dressler's Due Process Rights were implicated due to Significant Delays, Procedural Irregularities and Lack of Transparency

The Connecticut Supreme Court has recognized that grievance procedures may raise due process issues when delays become sufficiently prejudicial. "We reserve for another day therefore the resolution of grievance procedure delays that are so prejudicial that they implicate the due process rights of an attorney charged with professional misconduct." Statewide Grievance Committee v. Rozbicki, 211 Conn. 232 (1989) (footnote 6).

The delays in Mr. Dressler's proceedings were substantial and occurred through no fault of his own. Attorneys are required to wait one year before filing a new reinstatement application after a denial, which significantly prolongs the process. Disciplinary authorities have issued denials based on the grounds that "not enough time" has elapsed between the underlying misconduct and the readmission

application. Given that relatively few applications are filed each year, these requirements can effectively extend suspensions indefinitely. The delays and severity of the sanction in this case are particularly troubling considering a separate determination by the Connecticut Commission on Human Rights and Opportunities ("CHRO"), which found probable cause that Hartford Standing Committee Chairman Gary Friedle engaged in improper conduct that delayed Ms. Smalls-Miller's readmission application. State of Connecticut Judicial Branch v. CHRO, SC 21148. See also In Re Josephine Smalls-Miller, 3:18gp-00035 (SRU), page 6, Doc No. 39 ("Miller's federal license… has been suspended for nearly two years - a period twice as long as the underlying state disciplinary order on which my reciprocal order was based… at this late date it would be inappropriate to prolong her suspension for those violations.")

Federal District Judge Stefan Underhill noted significant delays in another case involving reciprocal discipline of a Connecticut attorney. See In Re: Zenas Zelotes, 3:13gp18 (SRU), page 6, doc no. 23 ("To impose reciprocal discipline so long after the hearing on the matter, over six years after the conduct at issue, and over three years after he was initially disciplined in state court, would be contrary to the interest of justice… Furthermore, the lack of a nexus between Zelotes' reprehensible conduct in a state court proceeding and his federal practice, which is almost exclusively in bankruptcy court, diminishes the need for an order of reciprocal discipline."); See also In Re: Rebecca Johnson, 3:02gp18 (AWT), doc 7, pages 6-7 (Ms. Johnson alleged in her Federal reinstatement application, which was granted by Judge Thompson, the following: "Johnson's most recent attempt at reinstatement has been similarly inordinately delayed… Recent evidence obtained from the Judicial Branch establishes that of twenty-seven persons who have sought reinstatement to practice in Connecticut in the past seven years, there were only two Black attorneys (Johnson and Miller) and one Latino who sought

reinstatement and who had their proceedings stayed for inordinately long periods.")

Mr. Dressler raised numerous concerns regarding the fairness of the proceedings and requested access to the original recordings of the hearings to determine whether portions of the transcripts had been omitted. (Entry 213.00). The three-judge panel did not address these requests.

The panel did not address Mr. Dressler's concerns regarding potential ex-parte communications between Mr. Friedle and SGC counsel. During oral argument, Mr. Friedle testified that all of his emails had been copied to Mr. Dressler. (Hearing Transcript p. 64). The record demonstrates that this statement was inaccurate, as certain communications were not contemporaneously shared with Mr. Dressler, such as those involving Mr. Dressler's employment as a paralegal.

Mr. Dressler raised conflict-of-interest concerns involving participants in the proceedings, including relationships between certain officials and members of the Standing Committees. (Entry 201.00). For example, the participation of New Haven State's Attorney Kathleen Morgan on the Hartford County Standing Committee raises potential concerns regarding impartiality. Members of the Office of the State's Attorney, such as Maxine Wilensky, had prior involvement with Mr. Dressler in connection with the Greer prosecution. In addition, the Judicial Branch's public relations initiative expressly identifies "collaboration" with the Chief State's Attorney's Office as an institutional objective. *Strategic Plan for the Judicial Branch*, Public Service and Trust Commission, p. 47. The participation of State Attorneys who previously interacted with Mr. Dressler, combined with the Judicial Branch's acknowledged institutional collaboration with those same offices, raises legitimate concerns regarding neutrality.

Judge Abrams also failed to address similar conflict of interest issues raised by Mr. Dressler concerning prior contacts Mr. Dressler had with members of the

Fairfield County Standing Committee, which the members never disclosed at any time. (Clerk's Appendix, p. 307-308).

E. The Failure of Attorney Friedle to Electronically Docket the "8 Exhibits" does not Alter their Status as Part of the Evidentiary Record

The Practice Book sections pertaining to disciplinary proceedings have been interpreted by the Connecticut Supreme Court as "directory and not mandatory" not depriving the Court of subject matter jurisdiction. Disciplinary Counsel v. Frank Cannatelli, 203 Conn. App. 236, 248 A.3d 83, 88 (2021). "In determining whether a court has subject matter jurisdiction, every presumption favoring jurisdiction should be indulged… attorney disciplinary proceedings are *sui generis,* that it is the exclusive duty of the Judicial Branch to regulate attorneys." In Re Nikola J Cunha v. State Farm Mutual Automobile Insurance Company,. 230 Conn. App. 265, 284-285 (2025).

The "eight exhibits" identified in Docket Entries 216.00 through 223.00 were formally marked during a Microsoft Teams proceeding in November 2024 and forwarded to the Standing Committee. There is no dispute that Chairman Friedle received the eight exhibits, which were expressly identified and marked as exhibits by the Statewide Grievance Committee. Accordingly, they became part of the "record made of its proceedings" within the meaning of Connecticut Practice Book § 2-53(j), regardless of Chairman Friedle's subsequent failure to electronically docket those materials, a requirement not contained anywhere in the Practice Book.

Related Practice Book provisions governing attorney disciplinary proceedings reinforce this conclusion. Practice Book § 2-35(h)(i) provides that "the reviewing committee's record in the case shall consist of a copy of all evidence it received or considered, including a transcript of any testimony heard by it, and its decision." By its plain language, the rule defines the record by what the committee "received or considered," not by what was subsequently uploaded to an electronic docket.

The Fairfield County Standing Committee entered into the record the transcript of the afternoon session of the 2020 proceedings yet failed to electronically file the transcript of the morning session of those same proceedings. (See Docket Entry 165.00.). There is no reasonable basis to conclude that the morning session transcript was any less a part of the proceedings, or less a component of the "record," than the afternoon session transcript, regardless of whether the Fairfield County Standing Committee ultimately filed it electronically. The proceedings constituted a single, continuous hearing, and both sessions formed part of the same evidentiary record.

Practice Book § 1-8 provides that "the design of these rules being to facilitate business and advance justice, they will be interpreted liberally in any case where it shall be manifest that a strict adherence to them will work surprise or injustice." The completeness of the record cannot reasonably be made to depend on a post-hoc, ministerial act of electronic filing. The absence of such a requirement is significant, particularly where the rules emphasize a "liberal interpretation" to avoid "surprise or injustice." It is not the burden of Mr. Dressler to audit the work of disciplinary authorities to identify omissions or errors in the record. Yet, when Mr. Dressler fails to identify even a single omission, the failure is turned against him and treated as a basis for sanction.

In refusing to allow Mr. Dressler to add these exhibits to the record, which were never required to be produced by Mr. Dressler during proceedings before the Fairfield County Standing Committee, the three-judge panel stated: "The committee record is closed… the applicant filed his motion following the panel's hearing held on November 20, 2025, almost eight months after the filing of the first committee report…" (Clerk's Appendix, p. 552). However, the three-judge panel granted the SGC permission to correct the record through the filing of transcripts in a motion dated November 17, 2025 (Docket Entry 212.00), which was likewise filed nearly eight months after the committee report and

approximately one year after the transcripts had been prepared. The three-judge panel's willingness to permit the SGC and the Hartford Standing Committee to supplement and correct the record, corrections brought to the attention of said disciplinary authorities by Mr. Dressler, while denying Mr. Dressler the same opportunity, constitutes a violation of Mr. Dressler's rights to Due Process, especially where Practice Book § 2-38(c), in similar disciplinary proceedings, provides: "By stipulation of all parties to such appeal proceedings, the record may be shortened. The court may require or permit subsequent corrections or additions to the record…" PB 2-38(d) provides: "If alleged irregularities in procedure before the Statewide Grievance Committee or reviewing committee are not shown in the record, proof limited thereto may be taken in the court. The court, upon request, shall hear oral argument."

When the "complete record" is considered, including the eight exhibits, the factual conclusions of the Hartford Standing Committee lack evidentiary support and therefore cannot withstand review under the clearly erroneous standard. The failure to consider the eight exhibits not only undermines the factual findings of the Hartford Standing Committee but also calls into question whether the three-judge panel conducted a comprehensive "complete record" review.

F. The Superior Court Erroneously Failed to Consider Motions filed by Mr. Dressler

Mr. Dressler timely moved for the disclosure of ex-parte communications, complete transcripts of all proceedings, and all related materials withheld from the defense (Entry 201.00 at 28). Despite raising these issues again at oral argument before the three-judge panel, specifically requesting access to original recordings, the court failed to address these requests. Furthermore, the court left unresolved the conflict-of-interest issues and the presence of Mr. Nolan at the hearing as raised in Entries 201.00 and 213.00. Although the Superior Court Clerk queried the parties on January 22, 2026, regarding whether the three Judge panel, a

Superior Court Judge or the Standing Committee should hear the pending motion docketed in Entry 224.00, the court never issued a formal ruling as to who was to decide the motions filed by Mr. Dressler in Entries 224.00 or 201.00. The three Judge panel did address Mr. Dressler's Motion filed on 11/26/25 (docket entry 215.00) and denied said motion. (three Judge panel decision page 11).

"In refusing to decide the motion before it by marking it 'off,' the trial court abdicated its fundamental obligation to decide all matters properly presented to it." Ramin v. Ramin, 281 Conn. 324, 915 A. 2d 790, 799 (2007) citing Ahneman v. Ahneman, 243 Conn. 471, 706 A.2d 960 (1998). "In the absence of 'an extreme, compelling situation,' a trial court that has jurisdiction over an action lacks authority to refuse to consider a litigant's motions." Id.

The three-judge panel committed reversible error by refusing to consider the motions filed by Mr. Dressler, thereby denying him due process and foreclosing his ability to demonstrate the procedural deficiencies in his case. "Without the documents that the plaintiff had sought through her motion, it is impossible to determine — and it would be equally impossible for the plaintiff to establish — whether the plaintiff's effort would have been successful had the court heard her motion and decided it in her favor. Thus, the defendant was the beneficiary of the court's improper refusal to consider the plaintiff's motion. Id., at 805.

G. The Superior Court Erroneously Relied on Facts not in the Record

The "ultimate facts" found by the Hartford County Standing Committee were predicated on either non-existent facts or purported "subordinate facts" attributed to the Fairfield County Standing Committee, facts that simply did not exist in the record. See Scott v. State Bar Examining Committee, 220 Conn. 812, 824 (1992). The three-judge panel's decision to uphold the Hartford Committee's findings on the basis of such unsupported facts violated Mr. Dressler's right to due process.

In his memoranda addressed to Judge Abrams, Mr. Dressler identified in detail numerous purported "facts" and "findings" attributed to the Fairfield County Standing Committee report that were unsupported by the record. For example, Mr. Dressler cited numerous examples in the 2022 Fairfield County Standing Committee report that made reference to facts that Mr. Dressler was not asked about at either the 2020 hearing nor the 2022 hearing, or facts that simply were not part of the record. For example, the 2022 report relied upon a federal court order denying Mr. Dressler's motion to vacate restitution, while omitting that Mr. Dressler had subsequently filed a motion for reconsideration of that ruling: "The undersigned filed a Motion for Reconsideration after Judge Hall issued this order denying his motion to vacate the restitution order, which the Panel apparently overlooked." (Docket Entry 167.00, p. 3). The Panel never questioned Mr. Dressler about Judge Hall's order during either hearing. Similarly, the Panel relied upon arguments contained in a 2018 court filing that were likewise never raised or discussed during the 2020 or 2022 proceedings. (Docket Entry 167.00, pp. 2–3). Throughout his memorandum, Mr. Dressler repeatedly emphasized that "this topic was never addressed during the two hearings…." (Docket Entry 167.00, p. 3).

Mr. Friedle's report relied on the Fairfield County Standing Committee's report that referenced "16 grievances" either filed by Mr. Dressler or filed against Mr. Dressler over the course of many years, some decades old. Mr. Dressler was never presented with copies of all the grievances during the Fairfield County Standing Committee that issued its report. (Docket Entry 167.00, p. 1-2). Nor was Mr. Dressler presented with copies of all the grievances at the Hartford County Standing Committee hearing. (Docket Entry 161.00, 167.00). The "16 grievances" were referenced in a 2020 report prepared by the SGC, but copies of most of these grievances were never made part of the record nor provided to Mr. Dressler. (Docket Entry no. 139.00).

The three-judge panel violated Mr. Dressler's Due Process rights by permitting the Standing Committee to rely on sixteen grievances, most of which were never admitted into evidence, while excluding from consideration the eight exhibits that were, in fact, admitted into evidence. Notably, SGC counsel Villar objected to the consideration of these exhibits before the three-judge panel on the grounds of "mootness" despite having previously told Mr. Dressler in a Teams meeting and email that they were marked, admitted into evidence, and forwarded to Mr. Friedle.

The three-judge panel stated that Mr. Dressler "apologized for not supplying some of the materials, indicated that he should have gone to the courthouse to obtain the materials, and shifted blame to his counsel by saying that his lawyers failed to point out any deficiencies in the application." (Clerk's Appendix, p. 551). However, neither the Hartford Standing Committee nor the three-judge panel identified which documents Mr. Dressler allegedly "failed to supply."

Mr. Dressler's purported "apology" concerned documents he was unable to produce, including a decades-old small claims judgment, a grievance resulting in reprimand and grievances filed against attorneys many years earlier. He explained to the Standing Committees that, while he was uncertain, he believed he might be able to obtain such materials by going to the courthouse. (Docket Entry 197.00, p 42-43; Entry 191.07, p. 36, 39). In reality, decades old small claims records and grievances dismissed against attorneys were not publicly available to Mr. Dressler. Mr. Dressler testified that he had, in fact, produced the grievance that resulted in a reprimand that was filed by the SGC / OCDC at prior hearings. (Docket Entry 197.00, p 42-43)

Moreover, Mr. Dressler did not "shift blame" to counsel. Rather, he explained in his pleadings that his submissions were made under the guidance of three different attorneys, all with decades of experience, including an attorney who co-authored a legal treatise on Connecticut legal ethics. This explanation was offered

to demonstrate Mr. Dressler's good-faith effort to comply with the application requirements, not to evade responsibility. Characterizing this explanation as an attempt to "shift blame" misstates the record and unfairly construes Mr. Dressler's testimony.

CONCLUSION

For all of the foregoing reasons, the three Judge panel committed reversible error in accepting the findings of the Hartford County Standing Committee.

BY: Lawrence Dressler, Pro Se, Appellant,
signed this 11th day of May, 2026

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CERTIFICATION

Pursuant to Practice Book § 62-7, I certify that this Brief complies with all applicable rules of appellate procedure, and I certify that a copy of this Brief has been sent electronically to each counsel of record in compliance with Practice Book § 62-7; that the Brief being filed with the appellate clerk is a true copy of the Brief that was submitted electronically; that the Brief does not contain any personal identifying information that is prohibited from disclosure by rule, statute, court order or case law; that the word count of the Brief is 11,725; that the Brief complies with Practice Book § 67-2A; and that no deviations from this Rule were requested/approved. Pursuant to Practice Book §§ 62-7 and 67-2A, I certify that this Brief does not contain any names or other personal identifying information prohibited from disclosure by rule, statute, court order or case law. Pursuant to

Practice Book § 62-7, I certify that this Brief complies with all applicable rules of appellate procedure, and that a copy of this Brief was sent electronically on this 11th day of May, 2026, to:

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