

Brock Fredin

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E-Mail: brockfredin@icloud.com

Date: October 3, 2023

BY E-MAIL TO AENGORON@NYCOURTS.GOV

Hon. Arthur F. Engoron
60 Centre Street
Chambers Room 566/418
New York, NY 10007

Re: *People v. Trump et al.*, Index No. 452564/2022 — Intervening Letter Concerning Ordering Directing Removal of @JudicialProtest Re-tweet and Repeated Ethical Violations by Principal Law Clerk Allison Greenfield

Justice Engoron:

My name is Brock Fredin and I operate the Twitter account @JudicialProtest. I write with respect to the blatantly unethical and partisan conduct of Your Honor's Principal Law Clerk Allison Greenfield, the Court's "Gag Order" issued today concerning President Trump's re-tweeting of my tweet about Ms. Greenfield and Senator Chuck Schumer taken at a Chelsea Reform Democrat Club brunch and the overly apparent appearance of impropriety in the above-referenced matter with respect to Ms. Greenfield's repeated partisan political and Democrat activities while employed as a law clerk.

Given that President Trump's post at-issue today was a re-tweet of my original tweet on the @JudicialProtest account, the Court's order directing President Trump to remove it is a direct attack on my First Amendment rights (as well as President Trump's), particularly since the Court asserted on the record that my tweet was a "personal attack" on Ms. Greenfield rather than a post exposing and criticizing the misconduct of a public official. I am consequently an interested party and submit this letter as such. To be clear, though, this letter and its contents are not a "personal attack" on Ms. Greenfield. Rather, this letter contains receipts and raises serious ethical violations as to her political speech and activities involving the Democrat Party while employed as your law clerk that undoubtedly create an appearance of impropriety in *People v. Trump et al.*

The Court's Gag Order is a clear attempt to paper over the apparent ethical violations by Ms. Greenfield and Your Honor and redirect animus and negative headlines at President Trump. Without this letter putting Ms. Greenfield's misconduct in the record, the Court's Gag Order of today will no doubt be the dam that will break causing the issuance of even more Gag Orders in other cases against President Trump that will unconstitutionally infringe on his First Amendment rights. I am therefore filing this letter with the Court not just to preserve my First Amendment rights, but to set forth the facts so that they are publicly part of the record and to ensure that President Trump and his sons are afforded a fair trial.

Based on the facts below and the clear ethical violations of both Ms. Greenfield and Your Honor, I am copying the New York Commission on Judicial Conduct, the Attorney Grievance

Committee for the First Judicial Department, the New York State Commission on Ethics and the Chief Administrative Judge of the New York Office of Court Administration. It is my hope that these entities and individuals will investigate and impose appropriate sanctions on Ms. Greenfield and Your Honor.

I. Undisputed Facts Concerning Ms. Greenfield's Partisan Speech and Activities while Employed as a "Principal Law Clerk" for Justice Engoron

There is no dispute based on her own social media that Ms. Greenfield has engaged in highly partisan speech and activities on behalf of the Democrat Party while employed as a Principal Law Clerk for Your Honor.

According to Ms. Greenfield's LinkedIn account, she began working as Justice Engoron's Principal Law Clerk in 2019. (*See* Attachment A.)

In 2022, while employed as a Principal Law Clerk for Your Honor, Ms. Greenfield apparently ran for a Manhattan Civil Court judgeship as a Democrat. She created and maintained a website for her campaign. (*See* Attachment B.) More importantly, Ms. Greenfield also maintained an Instagram page promoting her campaign with the handle @greenfield4civilcourt, which she continued to use to engage in partisan speech and activities on behalf of Democrat candidates and the Democrat Party even after her campaign. (*See* Attachment C.)

On the @greenfield4civilcourt Instagram page, Ms. Greenfield posted numerous plainly partisan posts and images concerning Democrats and the Democrat Party. Specifically, the posts and images include the following:

- Several posts containing endorsements from local Democrat organizations, such as Village Independent Democrats, the Grand Street Democrats and the Democrat Judicial Screening Panel (*see* Attachment C);
- Numerous posts posing with prominent Democrat officials during Democrat-sponsored events, such as the Chelsea Reform Democrat Club Founder's brunch. (*See* Attachment C.) The officials include Senator Chuck Schumer, Representative Carolyn Maloney and Representative Jerry Nadler. (*See id.*) Most important, the pictures are not just "fan photos" of Ms. Greenfield with these high profile Democrats as asserted by the media, but were clearly posted in order convey the perception that they were endorsing her run for Manhattan Civil Court. (*See id.*);
- Several posts that had nothing to do with her campaign that were clearly partisan and parroted Democrat talking points. (*See* Attachment C.) For example, in one post after the election, Ms. Greenfield posted "Channel Your Rage into Action...Abortion Is Healthcare." (*See id.*);
- Numerous posts containing the hashtags #Democrats, #ManhattanDems, #ManhattanDemocrats and #VillageIndependentDems (*see* Attachment C);

- Posts containing images of Ms. Greenfield “petitioning” on behalf of Democrat candidates, such as Representative Maloney, New York State Senator Brad Hoylman-Sigal, New York State Representative Deborah Glick and New York Civil Court Judge Deronn Bowen (*see* Attachment C);
- Posts containing images and statements that Ms. Greenfield was canvassing for @VoteBlueNYC and Democrat Representative Tom Malinowski October 2022 (*see* Attachment C);
- Several posts where Ms. Greenfield attended and participated in events for Village Independent Democrats, the Grand Street Democrats, the Chelsea Reform Democrat Club, the United Democrat Organization and the Downtown Independent Democrats (*see* Attachment C);
- Posts advertising for the Democrat primaries in New York (*see* Attachment C); and
- Posts with advertisements concerning Ms. Greenfield conducting events on behalf of the 700 Strong Dems while employed as a law clerk (*see* Attachment C).

Again, all these posts were made by Ms. Greenfield while employed as a Principal Law Clerk for Justice Engoron. (*See* Attachment C.) Even more important, many of the posts were made during the pendency of the instant *People v. Trump et al.* matter before Your Honor. (*See id.*) Moreover, Ms. Greenfield donated to two Democrat candidates during the 2022 election cycle in New York. (*See* Attachment D.)

As to this matter, it is apparent that Ms. Greenfield is actively involved in assisting Your Honor in *People v. Trump et al.* Ms. Greenfield has not sat at a clerk’s table, but at the bench with Your Honor for the first two (2) days of trial. (*See* <https://www.youtube.com/watch?v=6mBZNxEQl8o> at 1:36 (Day 1); *see also* <https://nypost.com/2023/10/02/trump-fraud-trial-in-nyc-live-updates-reactions-photos-more/> (Day 2).) Indeed, prior to the trial, the New York Times wrote:

The atmosphere in his courtroom is somewhat unusual. Beyond the levity he fosters, he discourages member of the public from standing, as is typical, when he enters. **He also gives broad latitude to his principal law clerk, Allison Greenfield, perhaps because he himself has served in that role. Ms. Greenfield keeps the trains running on time with a firm hand, in contrast to the judge’s generally genial demeanor.**

(*See* Attachment E (emphasis added) (*available at* <https://www.nytimes.com/2023/10/02/nyregion/arthur-engoron-fraud-trial-trump.html>)). Ms. Greenfield’s command of Your Honor’s courtroom is confirmed by a recording of a virtual contempt hearing against attorney Robert Wallack in the matter *Sage Reality Corp. v. Wallack* in which she can be heard rendering decisions on behalf of Your Honor and barking at counsel that

she “will not tolerate” excuses from their clients.¹ (See [https://www.youtube.com/watch?v=0dKaWkz5qys.](https://www.youtube.com/watch?v=0dKaWkz5qys))

Lastly, Ms. Greenfield set her Instagram containing the partisan Democrat posts to private last night, after the first day of trial in *People v. Trump et al.* It is important to note that this was not Ms. Greenfield’s personal Instagram account. Rather, it was an Instagram account that she used as a platform for her failed bid to become a Manhattan Civil Court judge. The fact that Ms. Greenfield set her account to private **before** the media frenzy around her account today is deeply troubling and indicative that there is something Ms. Greenfield and Your Honor wish to hide (which is apparent from the screenshots in Attachment C).

II. Applicable Ethical Rules

New York State has failed to enact or publish formal ethical rules for law clerks. However, there are two sets of rules that are instructive as to Ms. Greenfield’s apparent misconduct: (i) the federal law clerk ethics manual entitled “Maintaining the Public Trust, Ethics for Federal Judicial Law Clerks”; and (ii) the New York State Judicial Cannons set forth in 22 NYCRR 100 *et seq.*

First, the federal ethics manual explicitly condemns Ms. Greenfield’s partisan Democrat posts and activities she undertook while employed as a law clerk. Commentary as to Canon 5 explicitly states that:

Political Activities

Canon 5 of the Code of Conduct prohibits law clerks from engaging in both partisan and nonpartisan political activity. You may not run for office; campaign for others; publicly endorse or oppose candidates; or contribute funds to political organizations, candidates, or events. You should not even take passive actions that might link you with a political issue, such as displaying a political sign or bumper sticker.

(See https://cafc.uscourts.gov/wp-content/uploads/HR/Forms/Maintaining-the-Public-Trust_2019-Revised-Fourth-Edition.pdf.) Ms. Greenfield not only violated every provision of

¹ Notably, the *Sage Realty Corp. v. Wallack* contempt hearing was held while Your Honor was holding Trump in contempt in this matter. The hearing in *Sage Realty Corp. v. Wallack* is illustrative of the deep-seated antagonism that Your Honor holds for President Trump. Specifically, in *Sage Realty Corp. v. Wallack*, attorney Robert Wallack refused to comply with multiple subpoenas, no-showed depositions, snubbed his nose at participating in the discovery process and refused to satisfy outstanding judgments totaling nearly \$500,000. (See *Sage Realty Corp. v. Wallack*, Index No. 655579/2020, NYSCEF Nos. 31-43.) At the virtual hearing, Your Honor showed absolutely no concern over Mr. Wallack’s attorney misconduct and blatant flaunting of the judicial process and lawful subpoenas. Instead, it rewarded Mr. Wallack by allowing him to settle the case for pennies of what he owed to his landlord. At the same time, Your Honor held President Trump and his attorneys to a clearly different standard by holding President Trump in contempt for his so-called failure to comply with discovery in this case and sanctioning him \$110,000.

Canon 5, but she did it repeatedly and gratuitously as her Instagram posts illustrate. (*See* Attachment C.)

Second, the New York Judicial Canons are instructive on the issue of Ms. Greenfield's partisan Democrat posts and activities. Indeed, there is no question that a law clerk is an extension of his or her judge and that a law clerk must adhere to ethical practices and canons that bind a judge. Here, Ms. Greenfield's conduct clearly violates the following Judicial Cannons:

Section 100.2(A): A judge shall respect and comply with the law and shall act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary.

Section 100.4(A): A judge shall conduct all of the judge's extra-judicial activities so that they do not: (1) cast reasonable doubt on the judge's capacity to act impartially as a judge ...

Section 100.5(A): Neither a sitting judge nor a candidate for public election to judicial office shall directly or indirectly engage in any political activity ... Prohibited political activity shall include:

(b) ... being a member of a political organization other than enrollment and membership in a political party;

(c) engaging in any partisan political activity ...

(d) participating in any political campaign for any office or permitting his or her name to be used in connection with any activity of a political organization;

(e) publicly endorsing or publicly opposing (other than by running against) another candidate for public office;

(f) making speeches on behalf of a political organization or another candidate;

(g) attending political gatherings;

(*See* 22 NYCRR 100 *et seq.*) Again, Ms. Greenfield's behavior violated all of these provisions in the Judicial Cannons.

It is apparent that Ms. Greenfield engaged in flagrant unethical behavior and attorney misconduct with respect to her: (i) running for office while employed as a law clerk; (ii) participating in partisan political activity while employed as a law clerk; (iii) engaging with and

promoting Democrat organizations and candidates while employed as a law clerk; and and (iv) engaging in overtly partisan speech while employed as a law clerk.

This misconduct by Ms. Greenfield in engaging in partisan political and Democrat speech and activities while employed as a law clerk is all the more serious given her position and involvement in the *People v. Trump et al.* matter. In this case, President Trump is the leading candidate for the 2024 Republican nomination for President of the United States and, according to most polls, the frontrunner for the 2024 Presidential Election. The case was admittedly brought with political motivations given that the Attorney General Letitia James campaigned as a Democrat on the platform that she would “get Trump,” “sue Trump” and “be a pain in the ass” for Trump. (See <https://www.cnn.com/videos/politics/2023/10/03/letitia-james-prosecute-trump-2018-comments-running-office-cnntm-vpx.cnn>; *see also* <https://twitter.com/45LVNancy/status/1708844926379991462>.) More importantly, the stakes of this litigation are unprecedented. This Court has unilaterally and without precedent decided to order the dismantling of a man’s businesses, barred him from conducting business in New York and directed the dissolution of his vast empire of assets in what will no doubt amount to a multi-billion-dollar government seizure. (See *People v. Trump et al.* Summary Judgment Order dated Sept. 26, 2023.) With these facts in mind, any reasonable person would question whether Trump can receive an impartial trial before Your Honor with Ms. Greenfield’s involvement in the case and her admittedly strong Democrat Party ties.

Indeed, how can anyone believe President Trump received a fair trial when Your Honor’s Principal Law Clerk is campaigning for Senator Schumer, Representative Maloney and other Democrats while employed as a law clerk and during the pendency of this case?

Even if Ms. Greenfield was not involved in *People v. Trump et al.*, her partisan political conduct warrants immediate dismissal as a law clerk, investigation by the Commission on Judicial Conduct and the Attorney Grievance Committee and disciplinary sanctions. This was a serious lapse in judgment by Ms. Greenfield that continued for nearly two (2) years, which has only impugned the integrity and impartiality of the Court. However, her involvement in *People v. Trump et al.* warrants no less than her immediate recusal from the case, an investigation into whether her partisan political conduct influenced any decision by the Court, reconsideration of the September 26, 2023 Summary Judgment Order and, most importantly, a new trial.

Ms. Greenfield’s blatantly partisan activities and speech on behalf of Democrats and the Democrat Party has created a massive appearance of impropriety and a conflict of interest in this case warranting remedial action on behalf of President Trump to ensure continued public confidence in the independence and integrity of the court system. See *People v. Adams*, 20 N.Y.3d 608, 612 (N.Y. 2013) (“[T]he appearance of impropriety itself is grounds for disqualification as our case law recognizes, when the appearance is such as to discourage public confidence in our government and the system of law to which it is dedicated” (internal citations and quotation marks omitted).); *People v. Shinkle*, 51 N.Y.2d 417, 420 (N.Y. 1980) (“Defendant, and indeed the public at large, are entitled to protection against the appearance of impropriety and the risk of prejudice attendant on abuse of confidence, however slight.”); *In re Hof*, 478 N.Y.S.2d 591, 596 (2nd Dept. 1984) (“It is an undeniable maxim of the legal profession that an attorney must avoid even the appearance of impropriety ... doubts as to the existence of a conflict of interest are to be resolved

in favor of disqualification.”). More importantly, it warrants the immediate rescinding of the Court’s order of today gagging President Trump and ordering the removal of his re-tweet of my @JudicialProtest tweet originally exposing Ms. Greenfield’s apparent misconduct.

III. Justice Engoron’s Misconduct in Connection with Ms. Greenfield Unethical Behavior

Your Honor is not without fault in this situation. At the very least, Your Honor failed to adequately supervise Ms. Greenfield while she was engaging in partisan political speech and activities while employed as a law clerk for Your Honor. It simply cannot be the case that Your Honor was unaware that Ms. Greenfield was running for office as a partisan Democrat while employed in your chambers or that she was engaging in other partisan political activities. An investigation should be commenced into what Your Honor knew and when he knew it as to Ms. Greenfield’s partisan political speech and activities while employed as a law clerk.

Even more egregious, though, is the fact that Your Honor has attempted to cover-up Ms. Greenfield’s misconduct. While President Trump’s re-tweet calling Ms. Greenfield the “girlfriend” of Senator Schumer was inappropriate, it nonetheless revealed serious ethical concerns and attorney misconduct in this case by Ms. Greenfield. When Your Honor became aware of Ms. Greenfield’s Instagram account through President Trump’s re-tweet, Your Honor should have immediately removed her from the *People v. Trump et al.* case to avoid an appearance of impropriety and conducted an investigation into whether her unethical partisan conduct influenced any decision or ruling in the case. Instead, Your Honor ordered President Trump to remove the re-tweet behind closed doors to avoid further scrutiny of Ms. Greenfield and issued a “gag order” prohibiting President Trump from further criticizing Ms. Greenfield’s apparent misconduct on social media. Your Honor’s conduct was not that of a discerning judge concerned about upholding the integrity, impartiality and public confidence of the court system. Instead, Your Honor’s actions reek of an attempt to conceal and cover-up both your own and Ms. Greenfield’s egregious ethical violations and misconduct and to avoid further examination of Ms. Greenfield’s Instagram posts.

IV. Requests for Investigations

As stated above, I am copying the Commission on Judicial Conduct, the Attorney Grievance Committee for the First Judicial Department, the New York State Commission on Ethics and the Chief Administrative Judge of the New York Office of Court Administration on this letter.

I am requesting that, based on this letter, each of the entities above open an investigation into Your Honor and Ms. Greenfield to determine whether any ethical or court rules have been violated and to impose appropriate sanctions. The facts laid out above are incredibly troubling. They cast a chilling shadow over the *People v. Trump et al.* matter as well as the New York Unified Court System and would make any reasonable person question the integrity and impartiality of Ms. Greenfield, Your Honor and the court system as a whole.

Indeed, this case draws clear parallels to the attorney disciplinary case brought against President Trump’s former attorney, Rudy Giuliani, in the First Department. In that case, the “Principal Staff Attorney” Kevin M. Doyle brought the proceeding to strip Mr. Giuliani of his bar

license without a hearing. *See In re Giuliani*, 146 N.Y.S.3d 266 (1st Dept. 2021). After the First Department ordered the interim suspension of Mr. Giuliani law license, it came to light that Mr. Doyle was an unabashed Trump-hater and engaged in partisan political speech in an article published in “America: The Jesuit Review.”

Specifically, in the midst of the 2020 campaign, Mr. Doyle publicly called President Trump a “racist,” a “misogynist” and a “solipsistic man-boy.” (*See* Attachment F, Doyle Bar Complaint.) Notably, some sort of investigation into Mr. Doyle is ongoing as a final decision concerning Mr. Giuliani’s law license in New York is over two (2) years overdue and the District of Columbia Bar decided to bring original formal charges against Mr. Giuliani, despite having obtained a reciprocal disciplinary order suspending him based on the First Department’s decision. (*See* <https://www.politico.com/news/2022/06/10/dc-bar-launches-ethics-charges-against-rudy-giuliani-00038977>; *see also* <https://www.cnn.com/2021/07/07/rudy-giuliani-dc-law-license-is-suspended-.html>.) An investigation and sanctions against Ms. Greenfield and Your Honor are warranted in this case as well given the appalling facts.

V. Conclusion

For the reasons set forth above, I ask that the Court make this letter a part of the public record in *People v. Trump et al.* In ordering the removal of President Trump’s re-tweet of my original tweet concerning Ms. Greenfield’s misconduct on my @JudicialProtest account, the Court has infringed on my First Amendment rights. That order should be rescinded. Moreover, appropriate inquiries should be opened into whether Your Honor and Ms. Greenfield engaged in any ethical violations or misconduct in connection with her partisan political speech.

Sincerely,



s/ Brock Fredin

Enclosures

cc: All parties and their counsel (*via NYSCEF*)
Jorge Dopico – Attorney Grievance Committee (*via USPS*)
Robert Tembeckjian – Commission on Judicial Conduct (*via USPS*)
Frederick Davie – Commission on Ethics and Lobbying in Government (*via USPS*)
Hon. Joseph Zayas – New York Office of Court Administration (*via USPS*)

ATTACHMENT A



Allison Greenfield

Principal Law Clerk to Hon. Arthur F. Engoron, Supreme Court Justice at New York State Unified Court System

New York, New York, United States

299 followers · 277 connections



[See your mutual connections](#)

Join to view profile



New York State Unified Court System



Benjamin N. Cardozo School of Law, Yeshiva University

Activity



**Great retirement party with my wonderful staff. Best in the court system!
#part12justice**

Liked by Allison Greenfield

Justice Adams and I thoroughly enjoyed presenting this continuing legal education program on Dec. 8 for the Columbian Lawyers Association.

Liked by Allison Greenfield

PERSONAL NEWS It's been a great 2 years working as the Chief of Staff for Harvey Epstein. At the end of this year I'll be transitioning off the...

Liked by Allison Greenfield

[Join now to see all activity](#)



Principal Law Clerk to Hon. Arthur F. Engoron, Supreme Court Justice

New York State Unified Court System

Jan 2019 - Present · 4 years 10 months

New York, New York

Senior Counsel, Special Litigation Unit

New York City Law Department

Apr 2013 - Nov 2018 · 5 years 8 months

New York, New York

Adjunct Professor

Benjamin N. Cardozo School of Law

Aug 2015 - Jun 2016 · 11 months

New York, New York

Associate

Jaffe & Asher

Dec 2010 - Apr 2013 · 2 years 5 months



Intern

Oxford University Press

Jun 2009 - Aug 2009 · 3 months

New York, New York

Intern

Federal Judiciary, Chambers of the Honorable George B. Daniels, SDNY

Jun 2008 - Aug 2008 · 3 months

New York, New York

Legal Assistant

Sidley Austin

Mar 2006 - Jul 2007 · 1 year 5 months

New York, New York

Education



2007 - 2010

New York University

BA · Economics, Politics

2003 - 2006

Licenses & Certifications

Federal Bar Admission

SDNY, EDNY

Issued Dec 2015

New York State Bar

-

Issued Apr 2011



Issued Nov 2010

More activity by Allison

New York City based Lawyer friends- I'm looking for an immigration lawyer for a friend. Looking for someone who can offer reasonable rates and/or...

Posted by Allison Greenfield

Can anyone recommend a good Manhattan based estate lawyer? Someone reasonably priced that can handle basic living wills, etc.

Posted by Allison Greenfield

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Alison Greenberg

Co-Founder / CEO at Ruth Health

New York, NY

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Ralph Wolf

Court Attorney at New York State Unified Court System

New York, NY

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Glen Parker

Office of ADR

Brooklyn, NY

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Jennifer Lee

Principal Law Clerk to the Hon. Mary L. Bejarano, Queens Supreme Court, Criminal Term

New York, NY

Connect

Hon. Kathleen Waterman-Marshall



Connect

Ophir Sternberg

Founder & CEO Lionheart Capital , Co-owner Cigarette Racing Team, Executive Chairman BurgerFi
Nasdaq: BFI, Chairman Security Matters Nasdaq ,SMX Board of Directors LifeWallet Nasdaq: LIFW
Miami, FL

Connect

Alex Bores

Engineer and NY Assemblymember | Cofounder of Foresight Partners
New York, NY

Connect

Alan Chaprack

Licensed Associate Real Estate Broker at Douglas Elliman Real Estate
New York, NY

Connect

Matthew Grant

Adaptable, High performance logistics worker in any environment.
Warwick, RI

Connect

Dana Vlachos

Attorney at Self
Bronx, NY

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We're unlocking community knowledge in a new way. Experts add insights directly into each article, started with the help of AI.



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Project Engineering Lead at Chart Energy & Chemicals, Inc.

Greater Houston

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Court System

Principal Law Clerk to Hon. Arthur F. Engoron, Supreme Court Justice at New York State Unified Court System

Benjamin N. Cardozo School of Law, Yeshiva University

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ATTACHMENT B



ALLISON GREENFIELD *for* Manhattan Civil Court



ATTACHMENT C

**PROUDLY
ENDORSED BY**



greenfield4civilcourt • Follow
Lower East Side Manhattan

greenfield4civilcourt Village Independent Democrats have worked tirelessly for decades to elect progressive political leaders and judges. I am humbled and honored to receive their endorsement!
Edited · 82w

caramel_brown_eyes.9085 Absolutely Beautiful 🥰🥰🥰
47w Reply

greenfield4civilcourt #judicialcandidate #democrats #lowereastside #manhattandems #manhattandemocrats #vid #villageindependentdems #2ndmunicipaldistrict #greenfield4civilcourt
83w Reply

27 likes
FEBRUARY 20, 2022

Add a comment... Post

ENDORSED BY



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...



greenfield4civilcourt I am honored to receive the endorsement of the @grandstreetdems! Their commitment to inclusion and progressive activism is exactly what our neighborhood needs. Thank you for your trust and support!
Edited · 82w



23 likes
FEBRUARY 25, 2022



Add a comment...

Post

After being rated as "Most Highly Qualified" by the Democratic Screening Panel and securing the endorsement of two local Democratic political clubs and many local politicians (for all of which I am most grateful), I am withdrawing from the 2022 primary for the 2nd Municipal Court District. Two candidates who have major financial resources will be left to run against each other. Although this wasn't my year, I am optimistic that 2023 will be. I will enter the panel(s), hope to be reported out again, and hit the ground running. Keep an eye on this space, and I hope that you will support me in 2023!



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Lower East Side Manhattan



greenfield4civilcourt Thank you for all your support.
Edited · 82w



30 likes

FEBRUARY 26, 2022



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Post



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Abingdon Square Park

...



greenfield4civilcourt It's a beautiful day to be petitioning with the @villagedems who have endorsed incredible candidates like @bradhoylman @nycformaloney @bowen4civilcourt and #deborahglick
Edited · 81w



22 likes
MARCH 5, 2022



Add a comment...

Post



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greenfield4civilcourt So thrilled to attend the Chelsea Reform Democratic Club Founders's brunch today honoring incredible and fearless lifelong public servants like @senschumer and @repmaloney .

Thank you @crdcnyc for a fantastic event!!!

73w



swonderoh 🍋🍋🍋🍋🍋

73w 1 like Reply



47 likes

APRIL 30, 2022



Add a comment...

Post



greenfield4civilcourt • Follow

greenfield4civilcourt So thrilled to attend the Chelsea Reform Democratic Club Founders's brunch today honoring incredible and fearless lifelong public servants like @senschumer and @repmaloney .

Thank you @crdcnyc for a fantastic event!!

73w

swonderoh 🍌🍌🍌🍌🍌

73w 1 like Reply



47 likes

APRIL 30, 2022



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greenfield4civilcourt • Follow

greenfield4civilcourt NYC: Early voting starts today!!!!

There are 2 Democratic primaries in NYC this year- June 28th and August 23rd. Both primaries are critically important and because there are two this year low voter turnout is a huge concern. Don't sleep on your right to participate in your local government!!

Find your early location here:

<https://findmypollsite.vote.nyc/>

Edited · 66w

wilson98965 So cute and lovely 🐶🐶🐶

60w Reply

...



19 likes

JUNE 18, 2022



Add a comment...

Post

WHAT IS THE CIVIL COURT & POLITICAL NOMINATION PROCESS?

700 Strong Dems & Coalition for a District Alternative (CODA) invite you to a Judicial Education Virtual Workshop

Monday, December 12, 2022 6:00 PM Eastern Time

WITH



Allison R. Greenfield, JD
Facilitator

Principal Law Clerk



Hon. William Smith
Moderator

District Leader, 68th District-Part D

Join by Zoom or Dial-In:
Meeting ID: 885 0273 6612
646-931-3860



greenfield4civilcourt • Follow



greenfield4civilcourt Join me and @smith4ny on Monday, December 12 for a (virtual) educational conversation about the Civil Court Judicial process in Manhattan!

Sponsored by @700strongdems and @coda_les - Link to the zoom in bio!

42w



jessieejam Will the recording be available?

41w Reply



700strongdems #Harlem #EastHarlem #ElBarrio #SpanishHarlem #Manhattan



700strongdems

700 Strong Dems

4 posts

87 followers

67 following



+ Follow



Add a comment...

Post



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West Village, NYC



greenfield4civilcourt Always so fun spending time with my friends from @villagedems

For decades, VID has worked to reform city and state politics to ensure that we have the most progressive political leaders, judges, and policies.

If you are in or around the village and want to hear more or get involved go to <https://villagedemocrats.org/get-involved/>



34w

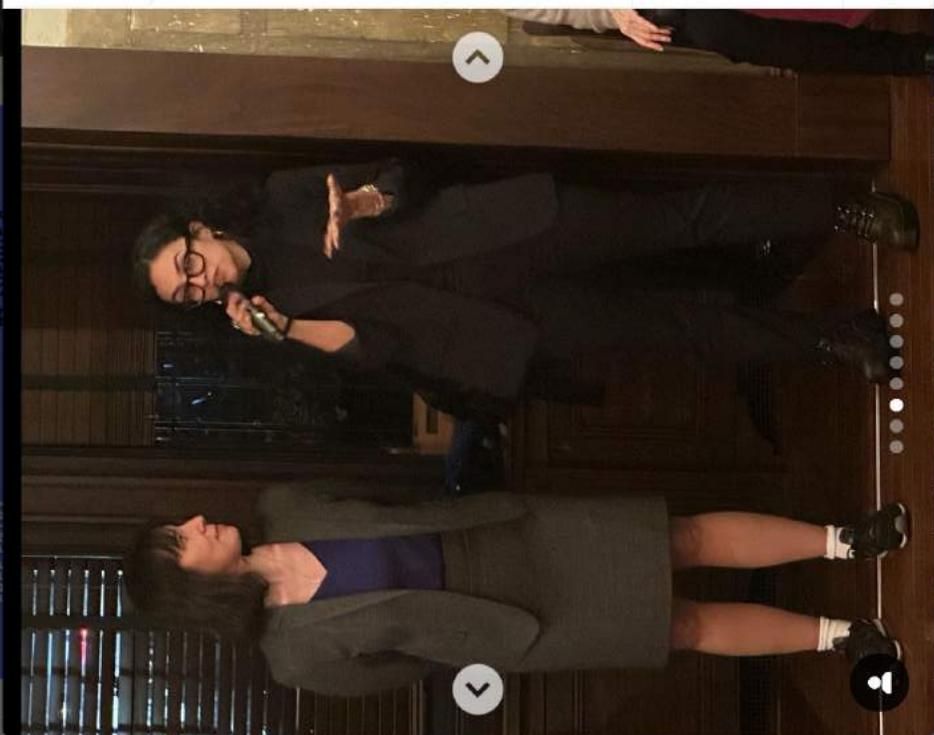


38 likes
JANUARY 29



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The National Arts Club



greenfield4civilcourt Nasty weather wasn't going to stop these amazing democratic groups and elected officials from gathering and working to build community engagement! Thanks to:
@harveyforny
@reshmapatelnyc
@mas_manzanita
@erdcnyc
@coda_les
@esindivisible
#tildendemocraticclub



31 likes
JANUARY 19



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STARTS AT 6:30 PM
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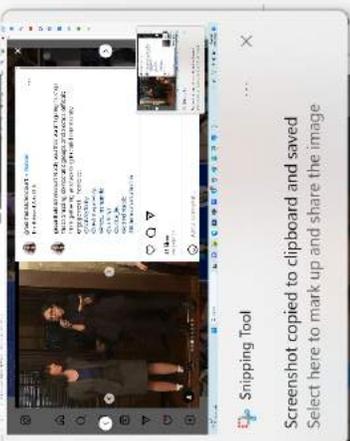
greenfield4civilcourt Nasty weather wasn't going to stop these amazing democratic groups and elected officials from gathering and working to build community engagement! Thanks to:
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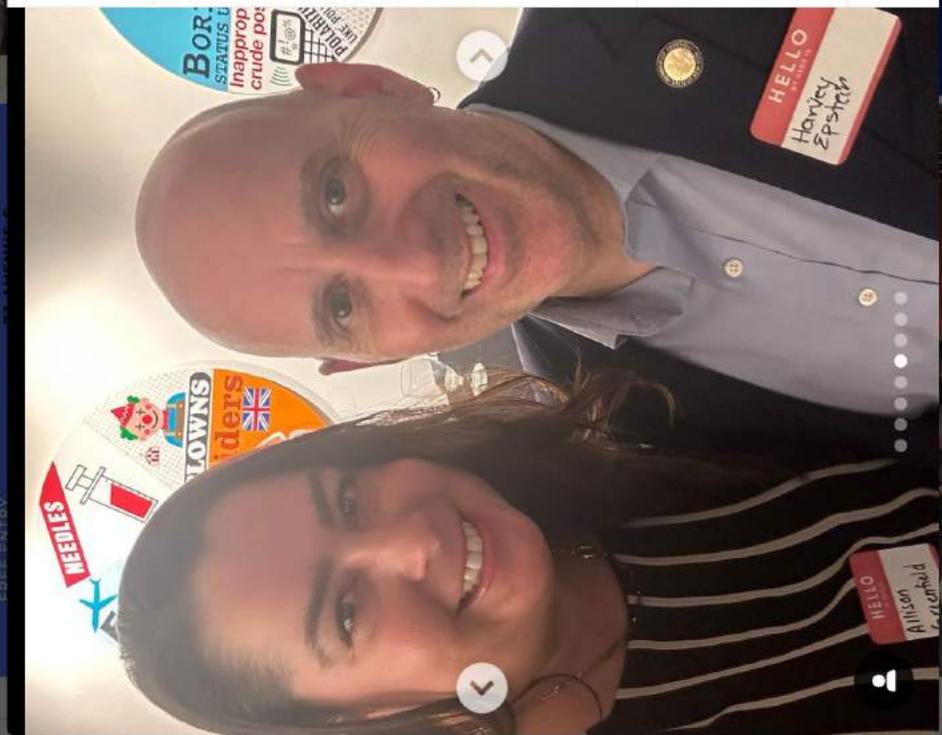
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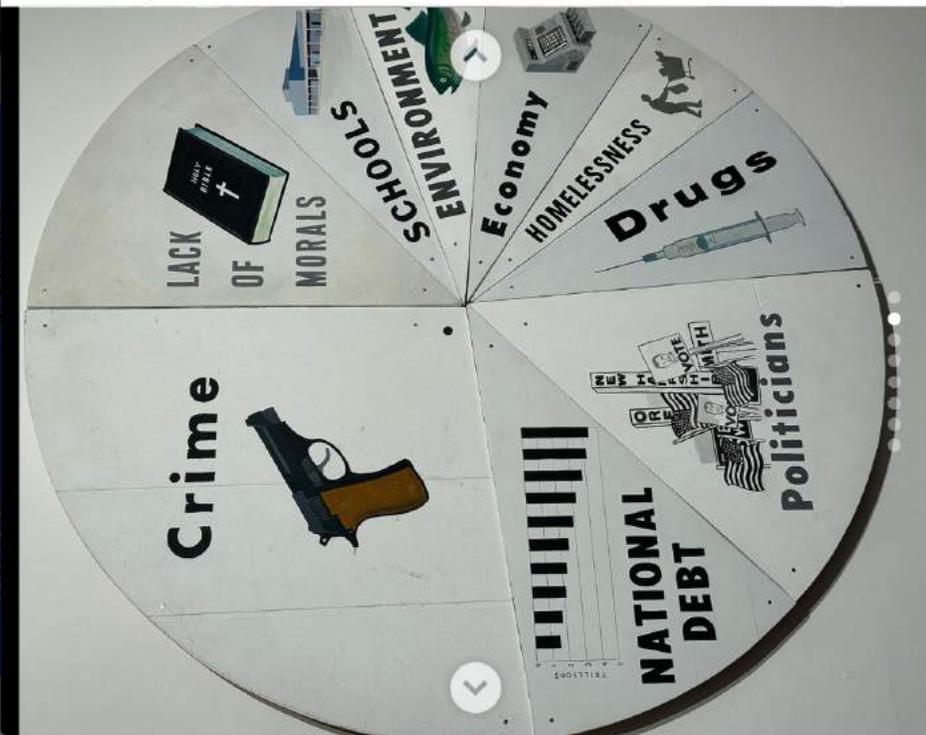
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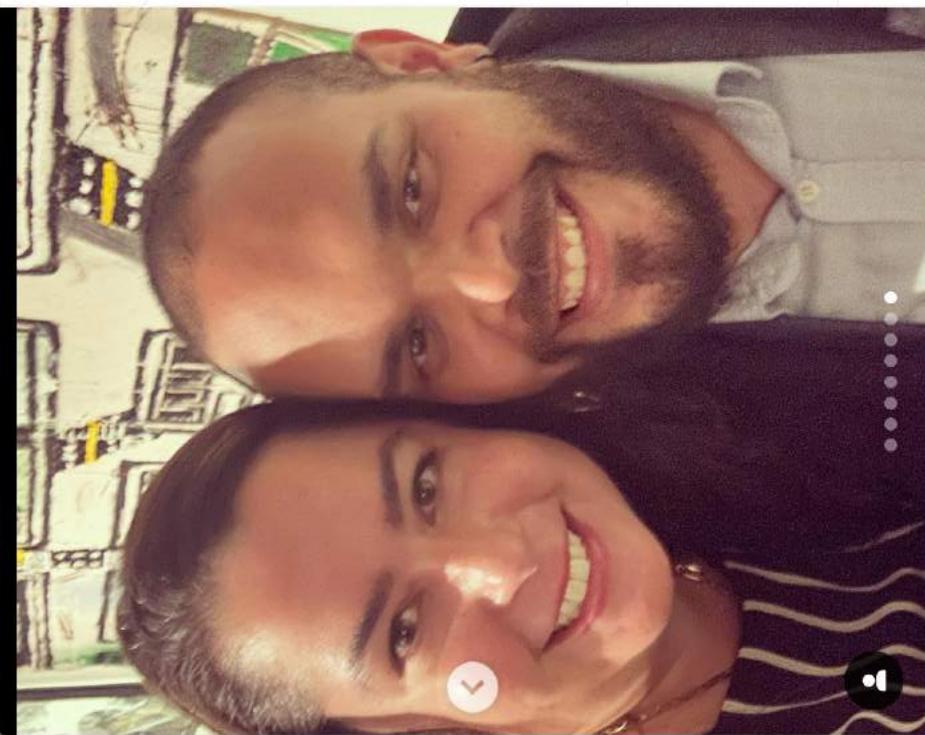
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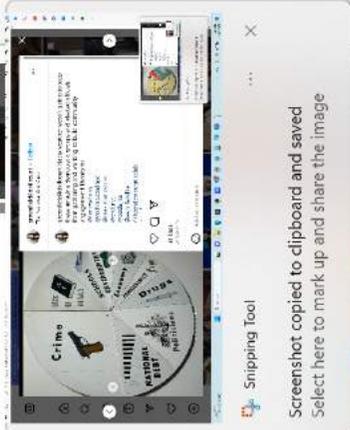


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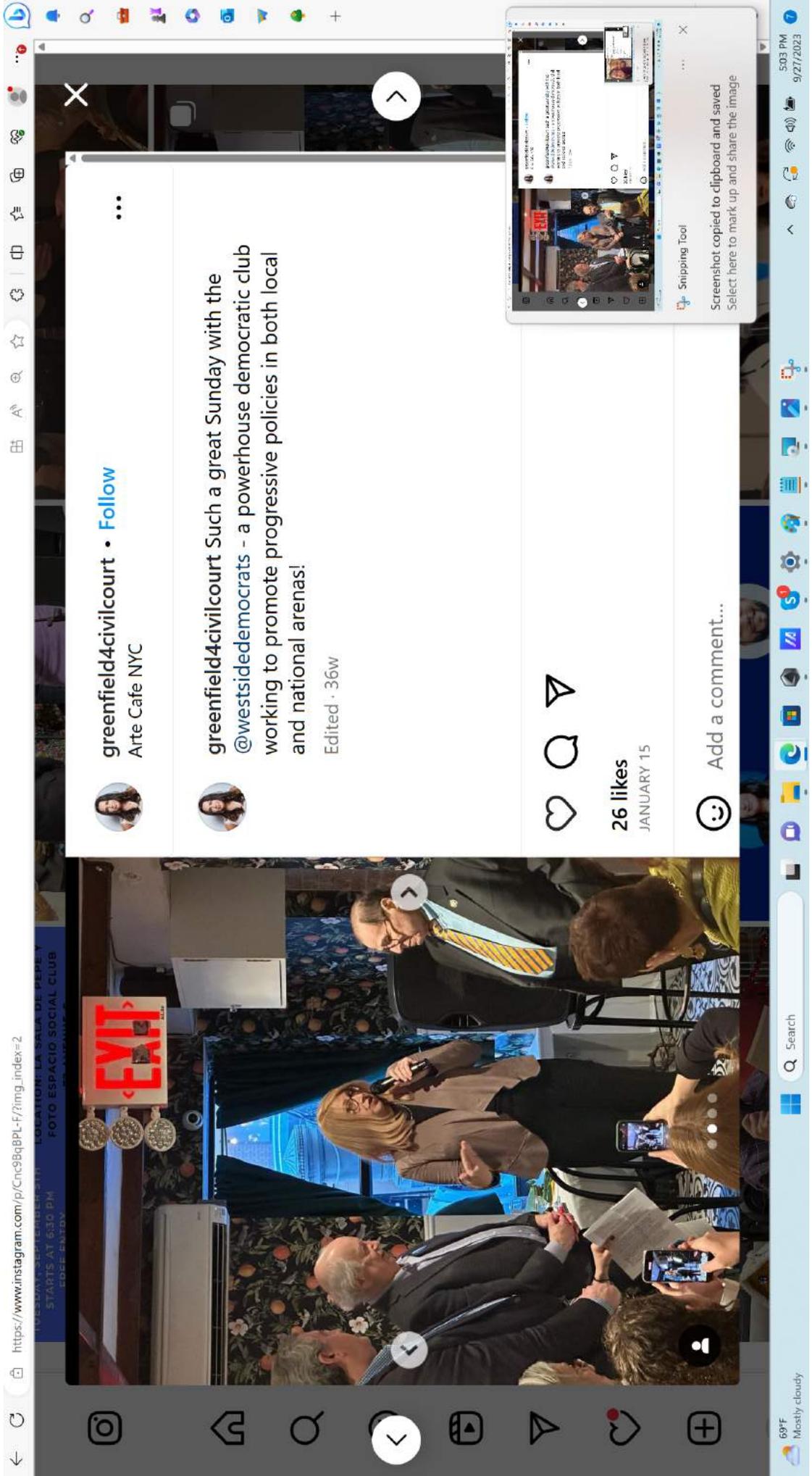
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LOCATION: LA SALA DE PEPE
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CASA DAVEY

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Arte Cafe NYC

@westsidedemocrats - a powerhouse democratic club working to promote progressive policies in both local and national arenas!

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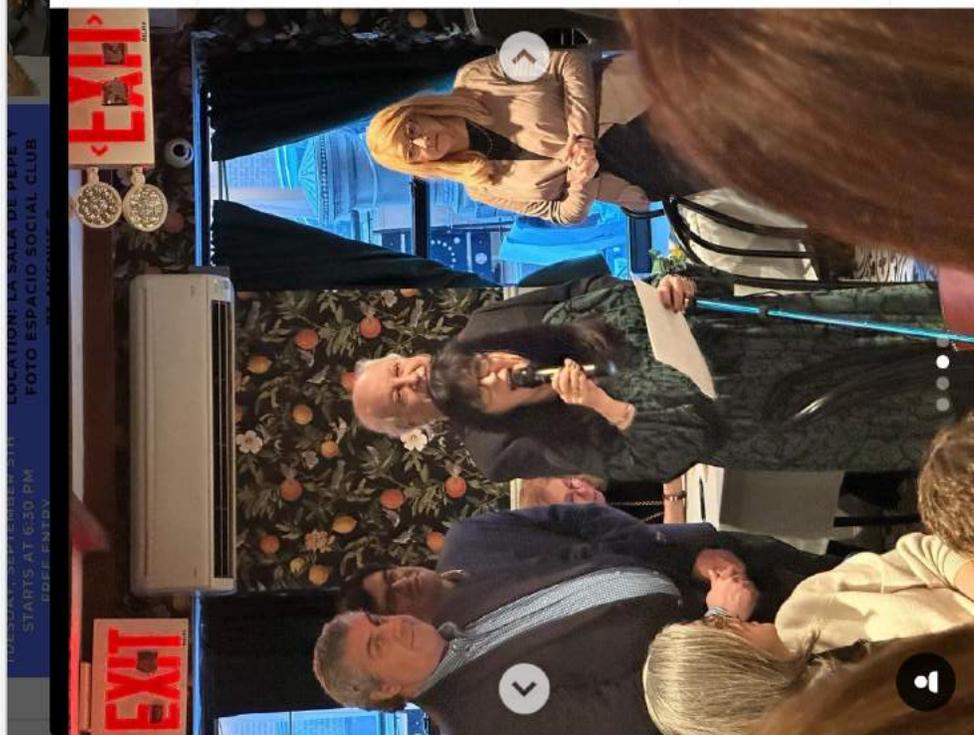
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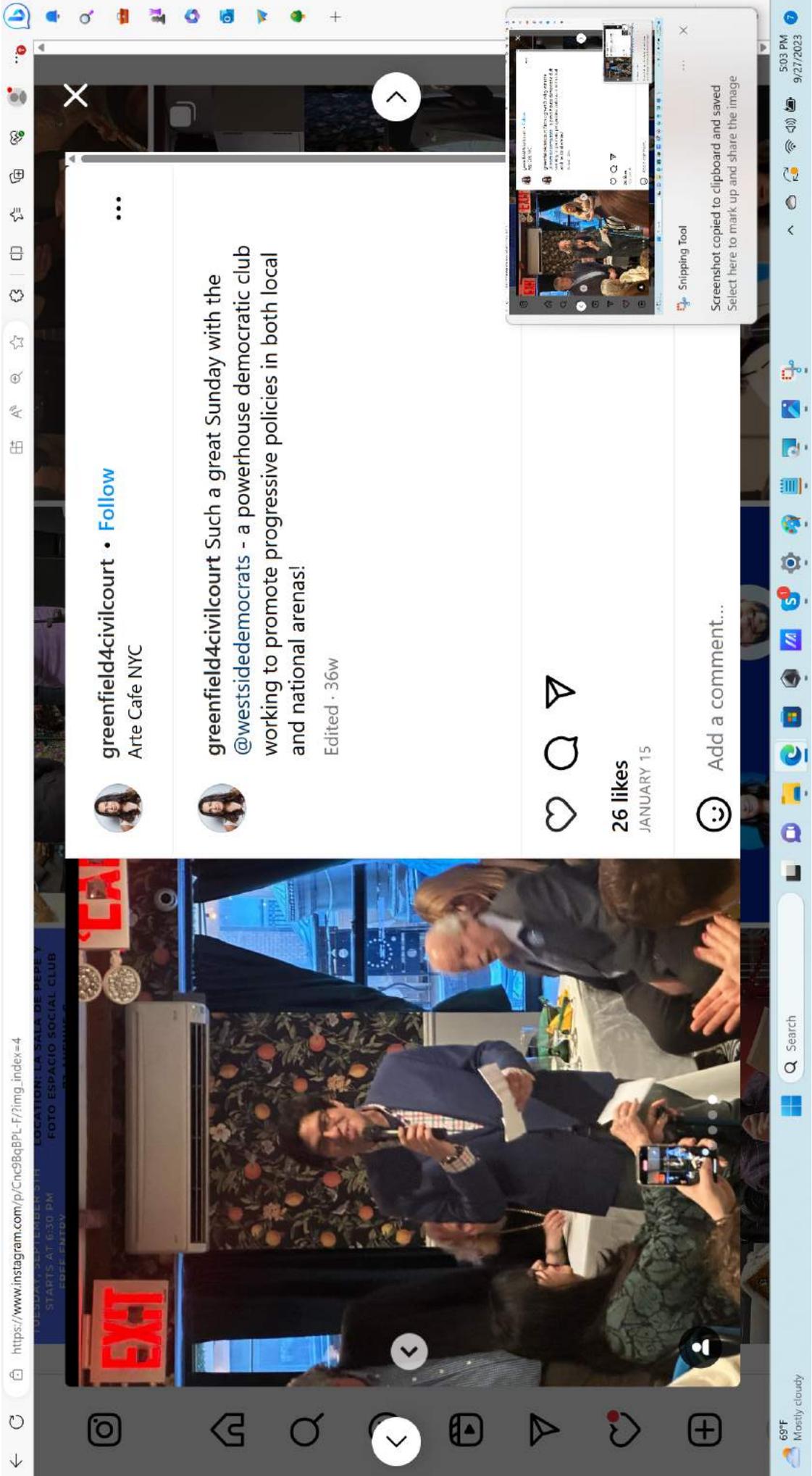
greenfield4civilcourt Such a great Sunday with the @westsidedemocrats - a powerhouse democratic club working to promote progressive policies in both local and national arenas!
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JANUARY 15

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LOCATION: LA SALA DE PEPE
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DOOR 5:00 PM

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Arte Cafe NYC

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T.J. Byrnes Bar & Restaurant



greenfield4civilcourt Wonderful to kick off the New Year with my friends at @did.nyc !!! They always know how to throw a great party for a great cause! Donations went to @shelteringarmsny who works to address the effects of social inequity in the most challenged communities in NYC.

Also special shout-out to the many electeds who showed up to support!!!

@chrismartenyc @nycdistrict1

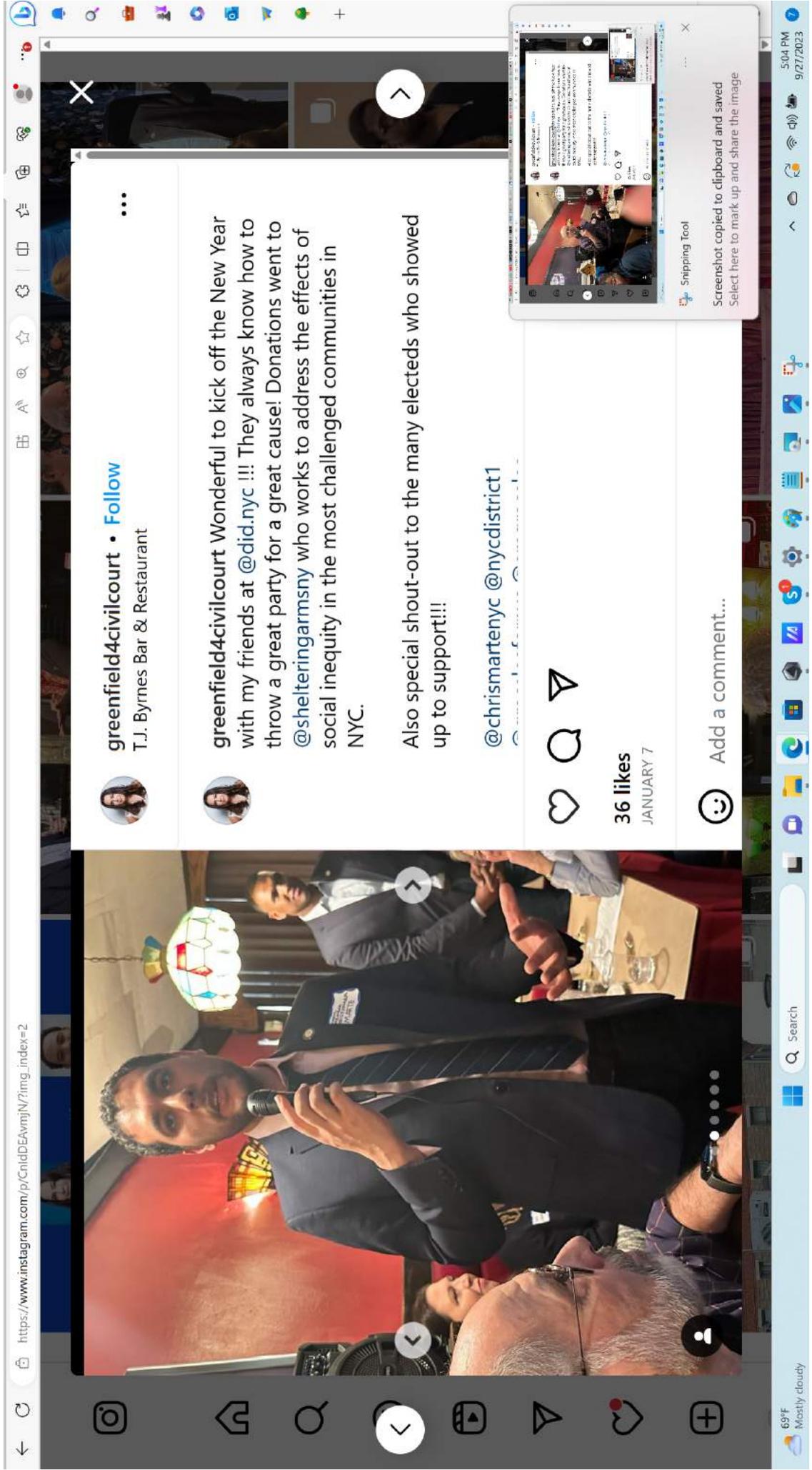


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JANUARY 7



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@chrismartenyc @nycdistrict1

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JANUARY 7

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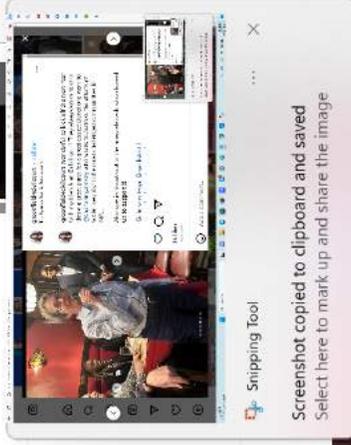
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JANUARY 7



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JANUARY 7



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The Porch

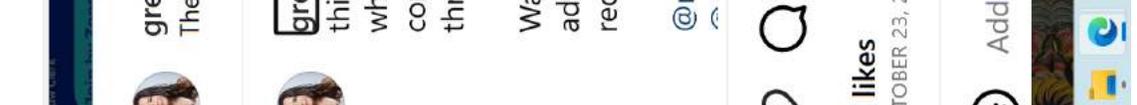
greenfield4civilcourt Was an absolute pleasure spending this Sunday with the @officialfredsam democratic club who is not only on the front lines fighting for their community every single day, but also knows how to throw an excellent party!

Was so inspiring to be alongside courageous community advocates and leaders as they share their stories and receive some much deserved recognition!!

@roseplnyc

30 likes OCTOBER 23, 2022

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@roseplnyc

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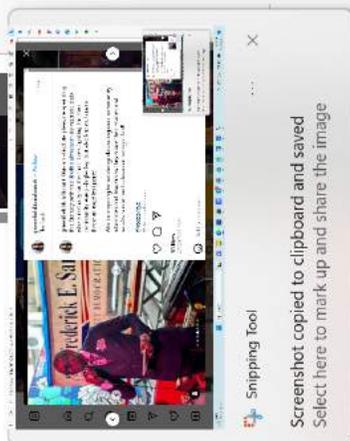
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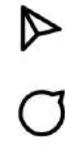
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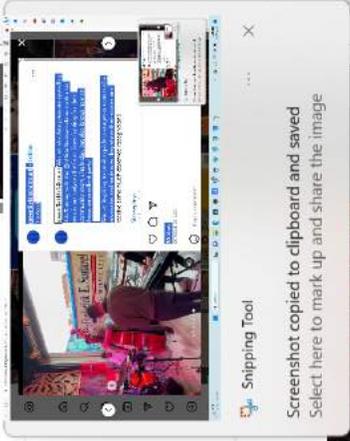
Nothing gives you the boost of energy and enthusiasm you need to keep fighting the good fight like an evening with the @grandstreetdems !! This incredible organization has been on the front lines of the fight for democracy and good government since its inception and I am so honored to call them friends.

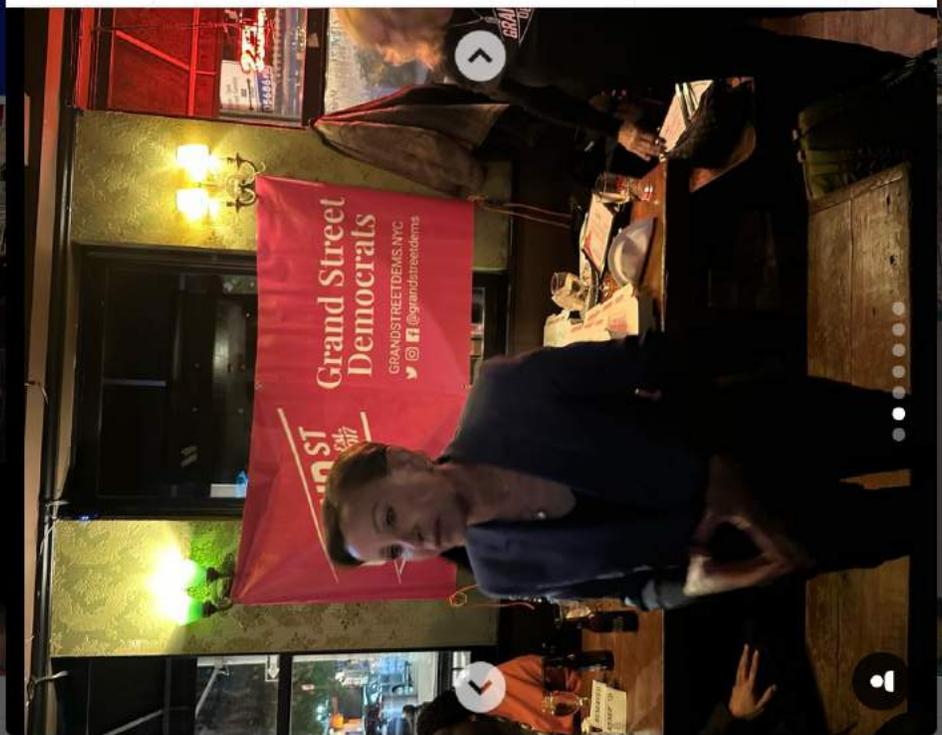
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OCTOBER 18, 2022

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 **greenfield4civilcourt** Nothing gives you the boost of energy and enthusiasm you need to keep fighting the good fight like an evening with the @grandstreetdemos !! This incredible organization has been on the front lines of the fight for democracy and good government since its inception and I am so honored to call them friends.

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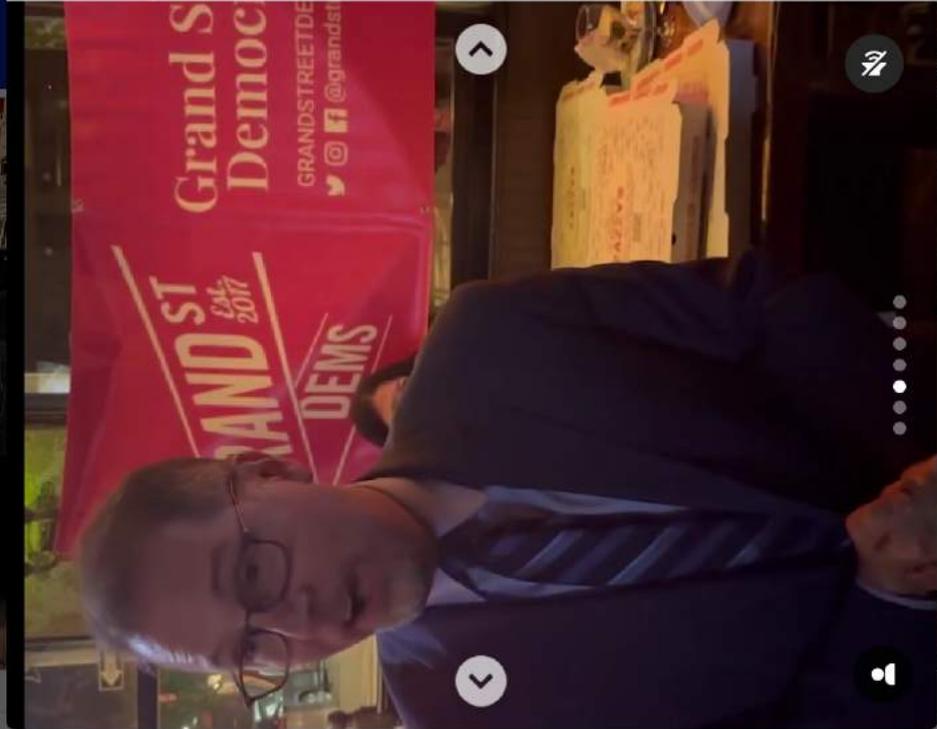
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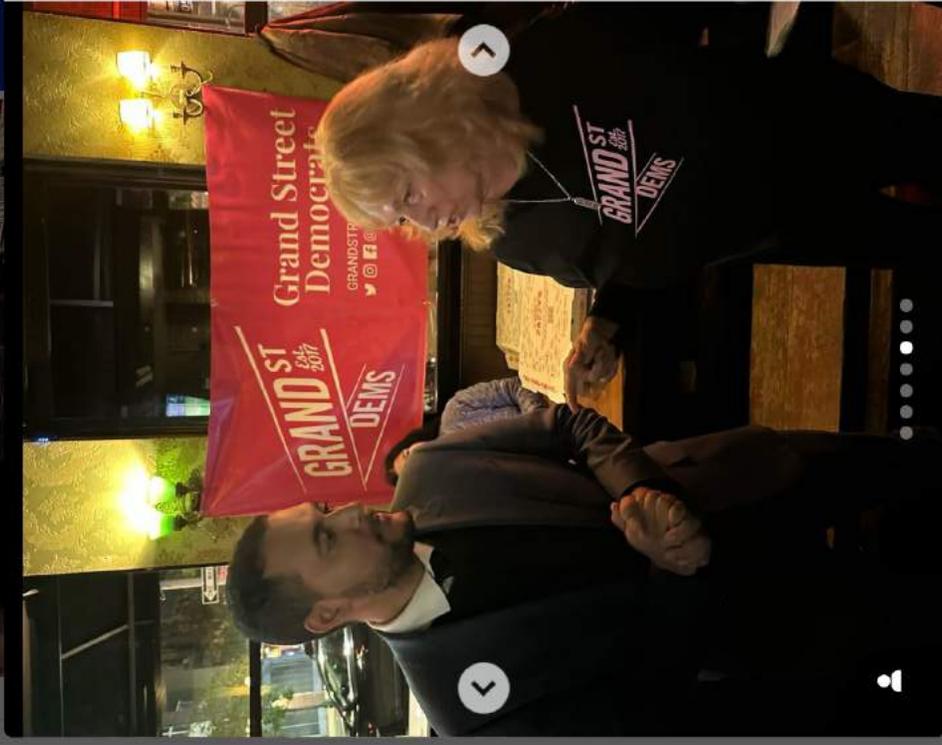


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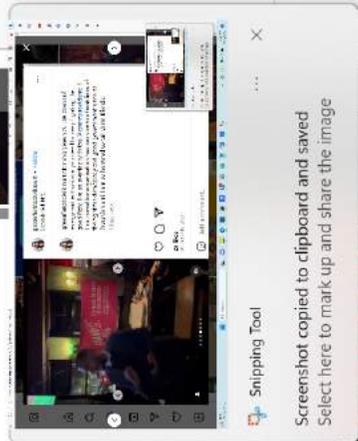
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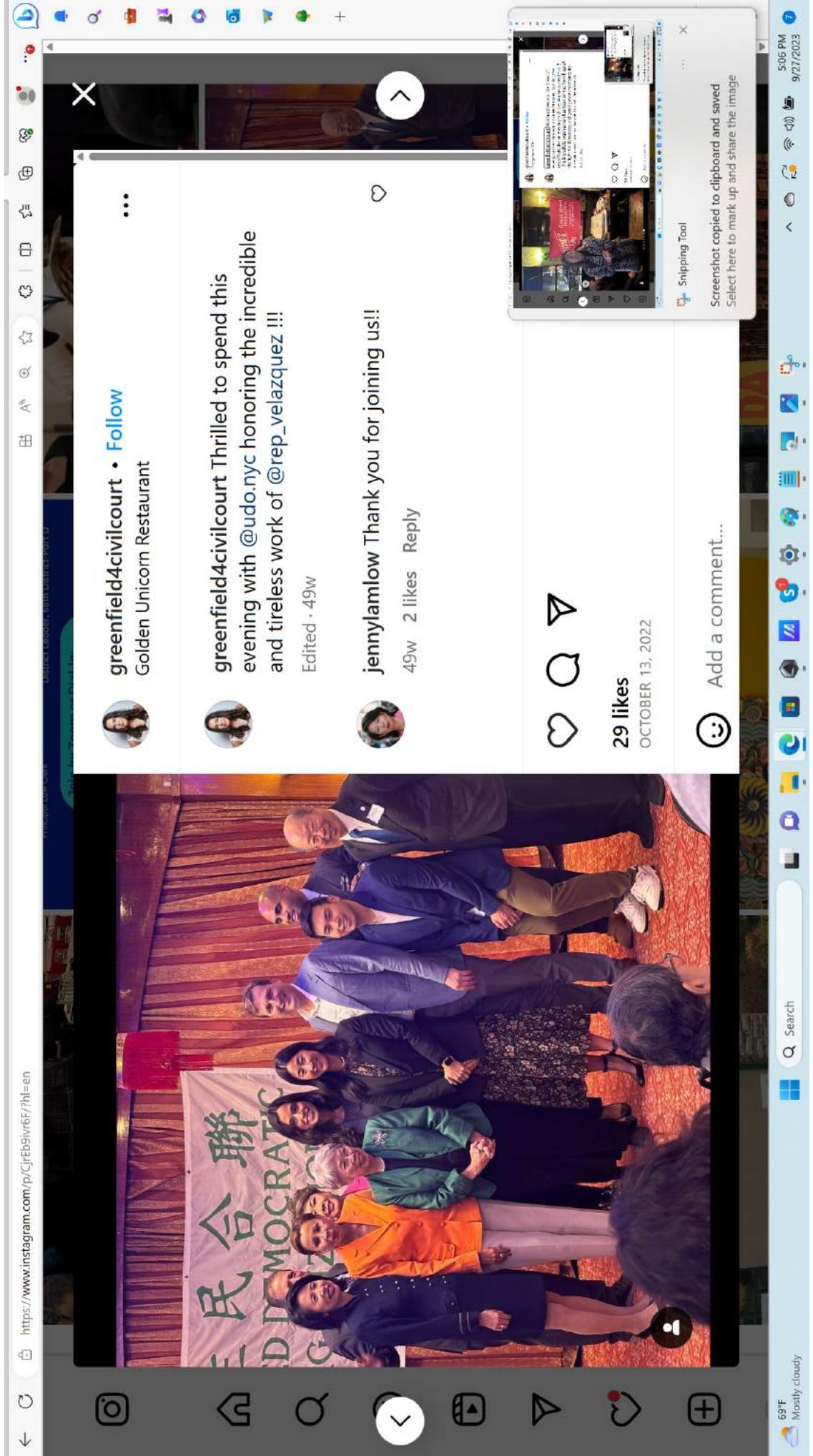


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Golden Unicorn Restaurant

greenfield4civilcourt Thrilled to spend this evening with @udo.nyc honoring the incredible and tireless work of @rep_velazquez !!
Edited · 49w

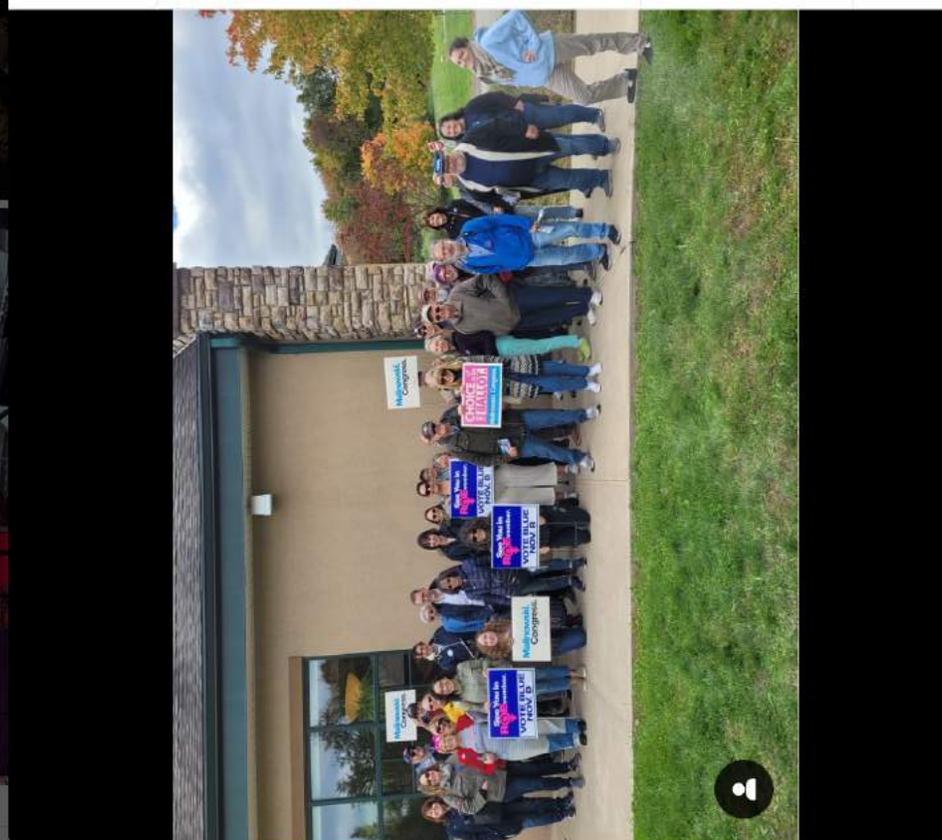
jennylamlow Thank you for joining us!!
49w 2 likes Reply



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OCTOBER 13, 2022

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greenfield4civilcourt • Follow
Mount Olive, New Jersey



greenfield4civilcourt So happy to be in NJ today with @votebluenyc canvassing for @malinowski4nj !! Midterms are in 30 days and the battle for control of the House has never been more critical!! Please take a moment to call or text anyone you know in a swing state and ask them what their voting plan is! #holdthehouse #choiceisontheballot #democracyisontheballot #voteblue2022

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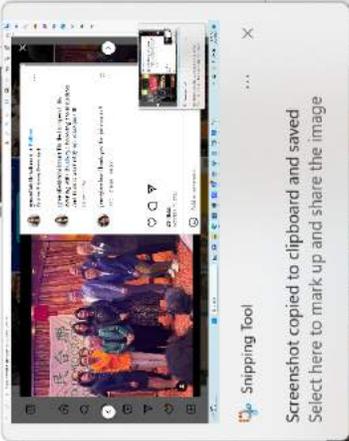


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ATTACHMENT D

Search Candidate: Contributions

Feedback

To and | or From

✖ Election Cycle: 2023: All Council Districts
✖ Recipient Type: Candidate only
✖ Contributor: Greenfield, Allison
[Clear all](#)

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Total Records: 2 | Search Total: \$40.00

ELECTION CYCLE		Name	Address	Recipient	Employer	Date	Amount	Type
<input type="text" value="2023"/> <input type="button" value="Go"/>		Greenfield, Allison	New York, NY 10002	Recipient: Botcher, Erik Office: City Council (2023)	Employer: New York State Occupation: Principal Law Clerk to Hon. Ar	11/10/2022	\$25.00	Monetary Contributions St#: 2 ID: R0007131
RECIPIENT Recipient Type <input type="checkbox"/> Include contributions made to candidates & independent spenders Office		Greenfield, Allison	New York, NY 10002	Recipient: Marte, Christopher Office: City Council (2023)	Employer: New York State Occupation: Attorney	10/8/2022	\$15.00	Monetary Contributions St#: 2 ID: R0013312

Showing 1 to 2 of 2 entries

ATTACHMENT E

Jurist presiding at Trump's civil trial will serve as judge and jury.

Justice Arthur F. Engoron, a fan of puns and pop culture, will decide the fate of the former president's family business at his civil fraud trial.



By **William K. Rashbaum**

Oct. 2, 2023

Arthur F. Engoron, who is presiding over Donald J. Trump's civil fraud trial, is an independent and thoughtful — if somewhat quirky — jurist who has served for 20 years in New York City Civil and State Supreme Court.

The 74-year-old judge, a former cabby with a shock of white hair and a penchant for cracking jokes from the bench, will effectively be judge and jury, deciding the fate of Mr. Trump's New York businesses, which make up a large portion of his real estate empire.

That's because the case was brought under a little known but powerful New York state law requiring that the matter be adjudicated at what is known as a bench trial, meaning that no jury will hear the case. The judge not only applies the law, as judges do in jury trials, but also decides the facts, a task that a jury would otherwise perform.

And that means that Justice Engoron, a Democrat, will play a far more prominent and consequential role than a judge would at a jury trial, not just during the proceedings, but in the ultimate outcome — unless he is overturned on appeal.

Last week, before the trial began, [Justice Engoron issued a decision](#) that itself could have a devastating impact on Mr. Trump and his family business. He ruled that the former president had consistently committed fraud by inflating the value of his assets by billions of dollars. The ruling could strip him of control of some of his flagship New York properties, including Trump Tower and 40 Wall Street.

Justice Engoron has been overseeing the matter for three years. When the state attorney general, Letitia James, was conducting her civil investigation into Mr. Trump's business practices, the judge resolved disputes over evidence. Then, after she filed the resulting lawsuit a year ago, the judge began hearing arguments and ruled on pretrial litigation.

While Justice Engoron's demeanor verged on the jovial in the earlier stages — and he still teases the lawyers and allows himself the occasional comic digression — the proceedings have become increasingly contentious. Last year, he held Mr. Trump in contempt, fining him \$110,000, and later, Mr. Trump unsuccessfully sought to have Justice Engoron taken off the case. Last week, in a social media post, Mr. Trump called the judge “deranged,” and on Monday, he said he was “rogue” and should be disbarred.

Now, as a result of threats, court security officers pick him up at his home in the morning and drive him to the courthouse, officials said. At the end of his workday, the officers drive him home.

Justice Engoron nonetheless seems to maintain his sense of humor. A fan of pop culture references who also revels in puns, he quoted from the Marx Brothers movie “Duck Soup” in a footnote to underscore his position that some of the defense's arguments were essentially designed to tell him to not believe his own eyes.

“As Chico Marx, playing Chicolini, says to Margaret Dumont, playing Mrs. Gloria Teasdale,” the judge wrote, “well, who ya gonna believe, me or your own eyes?”

Justice Engoron was appointed to the New York City Civil Court in 2003 and was elected — he ran unopposed — to the State Supreme Court in 2015. Before his time on the bench, he served as a law clerk to a State Supreme Court judge in Manhattan.

The atmosphere in his courtroom is somewhat unusual. Beyond the levity he fosters, he discourages members of the public from standing, as is typical, when he enters. He also gives broad latitude to his principal law clerk, Allison Greenfield, perhaps because he himself has served in that role. Ms. Greenfield keeps the trains running on time with a firm hand, in contrast to the judge's generally genial demeanor.

But Justice Engoron seems to be losing his patience with Mr. Trump. He has consistently ruled against the former president, and his decision last week had withering words for the defenses put forward by Mr. Trump's lawyers. He called the conduct of the defendants, who include the president's two adult sons and the family business, "obstreperous" and their arguments "bogus," saying they had ignored reality when it suited their business needs.

"In defendants' world," he wrote, "rent-regulated apartments are worth the same as unregulated apartments; restricted land is worth the same as unrestricted land; restrictions can evaporate into thin air."

At a hearing two weeks ago, the judge, addressing one of the former president's lawyers, pounded his fist in apparent frustration, saying, "You cannot make false statements and use them in business."

William K. Rashbaum is a senior writer on the Metro desk, where he covers political and municipal corruption, courts, terrorism and law enforcement. He was a part of the team awarded the 2009 Pulitzer Prize for Breaking News. [More about William K. Rashbaum](#)

A version of this article appears in print on , Section A, Page 13 of the New York edition with the headline: Jurist Presiding Over Trump Trial Is the Judge and Jury

Trump Civil Fraud Trial>

Opening statements are over. Trump attacked the attorney general and the judge.

The Trump civil fraud trial is unlike the criminal actions he faces.

The tenor of the trial changed during Trump's lawyers' opening statements.

The witness list reads like a Trump family (and company) reunion.

Trump faces a \$250 million fine and other serious punishments.

ATTACHMENT F

ATTORNEY GRIEVANCE COMMITTEE

Supreme Court, Appellate Division
First Judicial Department
180 Maiden Lane, 17th Floor
New York, New York 10038
(212) 401-0800

JORGE DOPICO
Chief Attorney

Email Complaint and Attachments to: AD1-AGC-newcomplaints@nycourts.gov. In addition, please send **one copy** of your complaint and attachments **by regular mail** to the above address. (If you do not have a personal email account, please send two (2) complete sets of your complaint and all attachments. There may be a delay in processing your matter if it is not emailed. Please **do not** include any original documents because we are unable to return them.)

Background Information

Today's Date: 07/01/2021

Your Full Name: (Mr. Ms. Mrs.) Anthony Zappin

Address: 1827 Washington Blvd.

City: Huntington State: WV Zip Code: 25701

Cell Phone: 304 730 4463 Business/Home Phone: _____

Email Address: anthony.zappin@gmail.com

Are you represented by a lawyer regarding this complaint? Yes No If Yes:

Lawyer's Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Business Phone: _____ Cell Phone: _____

Attorney Information

Full Name of Attorney Complained of: (Mr. Ms. Mrs.) Kevin M. Doyle

Address: 180 Maiden Lane, 17th Floor

City: New York State: NY Zip Code: 10038

Business Phone: 212 401 0800 Cell Phone: _____

Email Address: kedoyle@nycourts.gov

Date(s) of Representation/Incident: 07/01/2021

Have you filed a civil or criminal complaint against this attorney? Yes No If Yes:

If yes, name of case (if applicable): _____

Name of Court: _____

Index Number of Case (if known): _____

Have you filed a complaint concerning this matter with another Grievance Committee, Bar Association, District Attorney's Office, or any other agency? Yes No

If yes, name of agency: _____

Action taken by agency, if any: _____

Details of Complaint

Please describe the alleged misconduct in as much detail as possible including what happened, where and when, the names of any witnesses, what was said, and in what tone of voice, etc. Use additional sheets if necessary.

Please see attached letter.

Complainant's Signature (Required): _____



Anthony Zappin

1827 Washington Blvd. • Huntington, WV 25701 • Phone: (304) 730-4463
E-Mail: anthony.zappin@gmail.com

Date: July 1, 2021

VIA CERTIFIED MAIL AND E-MAIL

Justice Rolando Acosta
Supreme Court of the State of New York
Appellate Division, First Department
27 Madison Avenue
New York, NY 10010

Jorge Dopico
Attorney Grievance Committee
First Judicial Department
180 Maiden Lane, 17th Floor
New York, NY 10038

Re: Disciplinary Complaint against Kevin M. Doyle

Dear Justice Acosta and Mr. Dopico:

I write to file a formal ethics complaint against attorney and disciplinary prosecutor Kevin M. Doyle in connection with the attorney disciplinary case *Matter of Giuliani*.

It is my understanding that Mr. Doyle is admitted to practice in the First Department and maintains a professional address at 180 Maiden Lane, Floor 17, New York, NY 10038. Thus, he is within the jurisdiction of the First Department with respect to ethical and attorney disciplinary matters.

As you know, Mr. Doyle is the staff attorney who obtained an interim suspension and is currently pursuing disciplinary action against Rudy Giuliani in the First Department. He is seeking that discipline be imposed on Mr. Giuliani based on Mr. Giuliano's representation of President Donald Trump in the aftermath of the 2020 Presidential election. More specifically, Mr. Doyle has accused Mr. Giuliani of making false statements about voter fraud in connection with the 2020 election, despite the fact that there has never been an adjudication that any of Mr. Giuliani's statements were indeed false. Put bluntly, Mr. Doyle is requesting that discipline be imposed on Mr. Giuliani over matters that heavily trends towards the political spectrum.

It has been long held that the "role of the public prosecutor is not merely to convict but to foster the trust of the public in the ... justice system." *People v. Baker*, 99 A.D.656, 658 (4th Dept. 1984). "In fulfilling that function it is essential that a prosecutor avoid even the appearance of impropriety." *Id.* Here, Mr. Doyle brazenly and unabashedly shirked this responsibility.

In September 2019, Mr. Doyle threw his two cents into the political fray by writing a disturbing article for “America: The Jesuit Review.” Importantly, in that article he directly attacked President Trump and cast derogatory, disparaging and outright shocking aspersions at him, which included:

- Calling President Trump a “racist”;
- Calling President Trump a “misogynist”; and
- Calling President Trump a “solipsistic man-boy.”

These are troubling statements to come out of any attorney’s mouth, but they are especially shocking when they are made publicly by the First Department’s “Principal Staff Attorney” for the Attorney Grievance Committee. One would think Mr. Doyle would hold himself to a higher standard than calling the President of the United States a “man-boy.”

Regardless, the ABA Model Rules make clear that a “prosecutor should not use improper considerations, such as partisan or political or personal considerations, in exercising prosecutorial discretion.” ABA Prosecutorial Standard 3-1.6.

Here, Mr. Doyle’s public and childish aspersions against President Trump raise serious questions as to whether he was politically motivated or biased in pursuing disciplinary action against President Trump’s attorney, Rudy Giuliani. Certainly, in view of his aspersions against President Trump, Mr. Doyle acting as a lead prosecutor in *Matter of Giuliani* has created an improper “appearance of impropriety” violating the Rules of Professional Conduct and diminishing the public trust in the Attorney Grievance Committee and the attorney disciplinary procedures in the First Department.

Indeed, there is no question that Mr. Doyle knew he had previously made one (1) year prior politically charged and highly demeaning statements about President Trump in a published magazine when he undertook to prosecute Mr. Giuliani for purported disciplinary violations in connection with representing President Trump. Mr. Doyle no doubt knew his prior public statements would create an appearance of impropriety in prosecuting Mr. Giuliani if the statements were discovered. Most importantly, Mr. Doyle’s statements casting aspersions at President Trump would make any reasonable person question whether Mr. Doyle’s decision to charge Mr. Giuliani was improperly politically motivated.

To put it simply, Mr. Doyle should have never pursued the disciplinary matter against Mr. Giuliani in light of his 2019 statements casting politically charged aspersions at President Trump. If there was a case to be made against Mr. Giuliani, another staff attorney in the Attorney Grievance Committee could have handled it. By taking it upon himself to prosecute Mr. Giuliani, Mr. Doyle knowingly violated a host of ethical rules, breached the public trust and diminished confidence in the judicial process.

I respectfully request that the Attorney Grievance Committee and the First Department take appropriate disciplinary action against Kevin M. Doyle for his unethical actions, his misuse of a position of public trust and, most importantly, his statements and conduct that are unbecoming an attorney, much less a “Principal Staff Attorney” for the Attorney Grievance Committee.

I thank you both for your attention to this matter.

Respectfully,



Anthony Zappin

Enclosure

cc: Kevin M. Doyle
Hon. Barry Kamins
Hon. John M. Leventhal
Rudolph Giuliani

POLITICS & SOCIETY SHORT TAKE

With Democratic and Republican flaws, party registration comes down to a coin toss

Kevin M. Doyle

September 26, 2019

The great Protestant thinker [Reinhold Niebuhr](#) taught that we can be pure or responsible but not both. One must choose. And so I, a seamless garment [pro-lifer](#), will not again sit out a presidential primary as an unsullied independent while each party's base voters potentially sow ruin for harvest in the fall. Before the close of this article, I will pause and flip a coin to determine whether I will register as a Democrat or a Republican.

For a long time, I was an ardent Democrat. During my early adulthood, this affiliation kept with my views on racial and distributive justice, gender equality and military restraint. Meanwhile, I counted on my fellow Democrats to come round eventually on abortion. After all, in principle, the party stood with society's vulnerable. A lack of prenatal viability, it seemed to me, provided reason to protect, not permission to discard. I held out hope that this moral logic would ultimately prevail to the unborn child's benefit. Then I watched the Democratic Party harden into the Pro-Choice Party.

I, a seamless garment pro-lifer, will not again sit out a presidential primary as an unsullied independent while each party's base voters potentially sow ruin for harvest in the fall.

In 1995, I had to re-register to vote as I returned to my native New York from five years of representing death row inmates and capital defendants in Alabama. Not registering with a party made some sense because I was to head a controversial state law office created to represent capital-crime defendants. But I also recalled 1992, when Robert P. Casey, then the pro-life Democratic governor of Pennsylvania (and father of the current U.S. Senator Bob Casey Jr.), [was denied a chance to address the Democratic National Convention](#). That tipped the scale. I shed my Democratic identity.

For years, I had few regrets, even though, under New York's system, I had to watch primaries from the sidelines. Then came the 2016 presidential election. Would we get the overt racist and misogynist, the solipsistic man-boy who promised waterboarding and ["a hell of a lot worse"](#) and advocated [killing the families of terrorists](#)? Or would it be the candidate who, pantsuit aside, resembled the smart, secretive, calculating Richard Nixon—the candidate whose stance on abortion resembled the uncompromising pro-choice slogan ["abortion on demand and without apology"](#) more than it resembled her position in 2007 that abortion should be ["safe, legal and rare, and by rare, I mean rare"](#)? Some choice.

And now we all white-knuckle through an accidental presidency unprecedented in its incoherency, debasement and danger.

Shame on us, all of us, for those choices and calamitous outcome. Shame on me, the primary season bystander.

Looking ahead, whether my coin lands heads for Republican or tails for Democrat, I will not become a party zealot. I will recognize good ideas regardless of red or blue origins.

I will still think that Hillary Clinton showed foresight when she advocated a moonshot approach to [Alzheimer's research](#); compassion demands it, but so do health care cost projections as lifespans lengthen. I will still think that Rick Santorum correctly argued that our [tax code should encourage larger families](#); America's aging population both needs and threatens our entitlement programs. I will still think that Bernie Sanders was not simply indulging his faux socialism when [condemning private prisons](#); no person is a commodity to be warehoused for profit. And I will still think that Carly Fiorina put children first by advocating for [parental choice](#) through vouchers and charter schools where public schools are failing.

I will still take greatest satisfaction in good hearts and good minds rising above party lines: War hero John McCain stood for decency when he denounced as "[dishonest and dishonorable](#)" the cynical "swift boat" attempt to discredit John Kerry's record of valor under fire. Both [Mr. McCain](#) and [Mr. Kerry](#) stood for decency when they condemned waterboarding. Democrat Madeleine Albright and Republican Robert Gates offer an alternative to a balkanized United States by promoting the expectation of [universal national service](#), whether military or civilian, by every young person.

I will not become a party zealot. I will recognize good ideas regardless of red or blue origins.

Whether as a newly minted Republican or a Democratic retreat, I will put thorny questions to my party mates. To my fellow Republicans:

- Is The Wall Street Journal right when it claims that the only military the United States cannot afford is "[one that is too small](#)"? Aren't a crumbling infrastructure and ever-less-healthy youth, among other things, national security concerns and funding priorities?
- Just how will we persuade as the pro-life party when we do not even aim for universal health care? And given the availability of abortifacients and interstate travel, just how much will state prohibitions reduce the number of abortions?

To my fellow Democrats:

- Let's take pride in marriage equality, but does a pluralistic society need to punish the conscientious objector who refuses to bake a wedding cake for two lads or two lasses getting married? Why mimic the intolerance of those who would even today criminalize homosexual acts?
- More important, are we really champions of the weak when we perpetuate the moral fiction of a [magical birth canal](#)? Does the brief passage from *in utero* to *ex utero* really bestow personhood?

O.K. I have a quarter in hand. One flip, not two out of three. No do-overs. Heads, I revert to the Democratic Party; tails, I register Republican. Here goes...

Huh. Hmm. Gee.

So what was I saying? Oh yeah, was that F.D.R. a godsend or what?



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