

*Sent via Email*

April 2, 2026

Attorney Grievance Committee for the First Department  
Supreme Court, Appellate Division  
180 Maiden Lane, 17th Floor  
New York, NY 10038  
[AD1-AGC-newcomplaints@nycourts.gov](mailto:AD1-AGC-newcomplaints@nycourts.gov)

Re: Request for Ethics Investigation into Paul Weiss

Dear Attorney Grievance Committee Members and Chief Attorney Jorge Dopico:

Free Speech For People<sup>1</sup> respectfully requests that the Attorney Grievance Committee investigate Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul Weiss”), located at 1285 Avenue of the Americas, New York, NY 10019-6064, for violations of New York’s Rules of Professional Conduct arising out of the firm’s decision to enter into negotiations with and to ultimately grant significant concessions to President Donald J. Trump and his associates in order to obtain political favor with the Trump administration. The Committee should include in the scope of its investigation former firm Chairman Brad Karp<sup>2</sup> and other members of the management committee, who participated in agreeing to and satisfying the agreement with President Trump. In entering and taking steps to satisfy an illegal agreement with President Trump, Paul Weiss and these attorneys likely violated Rule 8.4(a) (violating the rules and inducing other attorneys to do so), Rule 8.4(b) (illegal conduct, including bribery and extortion), and Rule 1.7 (conflicts of interest).

## **I. BACKGROUND**

The relevant facts summarized herein are based solely on publicly available information. Free Speech For People does not claim that the organization, or any individual associated with it, has personal or institutional knowledge of the facts in this matter.

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<sup>1</sup> Free Speech For People is a national, non-partisan, nonprofit public interest organization dedicated to challenging government and corporate corruption, and protecting our country’s core democratic principles and our Constitution. Free Speech For People engages in legal advocacy, public education, and organizing in communities across the country. The organization has more than one million supporters nationwide.

<sup>2</sup> Mr. Karp resigned from his position as Chairman of Paul Weiss in February 2026 after emails between him and Jeffrey Epstein were made public, but he remains a partner at the firm. Dan Mangan, *Paul Weiss Chairman Brad Karp resigns after Jeffrey Epstein email disclosures*, CNBC (Feb. 5, 2026), <https://www.cnbc.com/2026/02/05/paul-weiss-brad-karp-resigns-jeffrey-epstein.html>.

## A. Paul Weiss's History

Paul Weiss, founded in 1875 and headquartered in New York, employs more than 1,000 lawyers and is one of the largest law firms in the United States. Per its statement of firm principles, its objectives include “in all things to govern ourselves as members of a free democratic society with responsibilities both to our profession and our country.”<sup>3</sup> The firm’s practice areas include “public M&A, private equity, litigation, white-collar & regulatory defense, and restructuring, along with equally strong practices in executive compensation, intellectual property, personal representation, real estate and tax law.”<sup>4</sup> The firm was also known for its rich pro bono practice, representing a diverse array of clients and advocating for critically important civil rights. The firm’s attorneys had a hand in overturning the conviction of the Scottsboro Boys in 1935, overturning the doctrine of “separate but equal” in *Brown v. Board of Education* in 1954, and obtaining a groundbreaking verdict in *Sines v. Kessler* against white supremacist groups from Charlottesville in 2021.<sup>5</sup> In the 1950s and 1960s, Paul Weiss was one of a few large firms that fairly hired and promoted Jewish lawyers.<sup>6</sup> In 1999, Paul Weiss brought a first-of-its-kind class action lawsuit to protect gay, lesbian, and bisexual children in foster care from violence and psychological abuse.<sup>7</sup>

In 2024, its revenue was over \$2.6 billion and it continues to have a large pro bono practice,<sup>8</sup> with one recent 2025 survey noting that the firm worked 90,139 annual pro bono hours across their U.S. offices and its attorneys worked an average of 82 annual pro bono hours.<sup>9</sup> Paul Weiss’s more recent pro bono projects included supporting New York City’s “Right to Shelter” initiative to help thousands of migrants who were bused to New York in 2022 and 2023<sup>10</sup> and launching a

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<sup>3</sup> *About Paul, Weiss*, Paul, Weiss, Rifkind, Wharton & Garrison LLP, <https://www.paulweiss.com/about-the-firm/our-firm/about-paul-weiss> (accessed March 18, 2026).

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

<sup>6</sup> Benjamin Weiser, *What to Know About Paul Weiss, the Law Firm Bowing to Trump’s Demands*, N.Y. Times (March 21, 2025), <https://www.nytimes.com/2025/03/21/nyregion/what-is-paul-weiss.html>.

<sup>7</sup> Nina Bernstein, *Suit Alleges Frequent Abuse of Gay Children in Foster Care*, N.Y. Times (Jan. 16, 1999), <https://www.nytimes.com/1999/01/16/nyregion/suit-alleges-frequent-abuse-of-gay-children-in-foster-care.html>; Mariah Lopez, *Opinion: To Paul Weiss, thanks for everything*, City & State N.Y., <https://www.cityandstateny.com/opinion/2025/04/opinion-paul-weiss-thanks-everything/404234>.

<sup>8</sup> Weiser, *supra* note 6.

<sup>9</sup> *The 2025 survey of pro bono hours*, Chambers Associate, <https://www.chambers-associate.com/law-firms/pro-bono-hours> (accessed March 18, 2026).

<sup>10</sup> MP McQueen, *Pro Bono Innovators 2024 Honoree Paul, Weiss, Rifkind, Wharton & Garrison*, Bloomberg Law (Nov. 21, 2024), <https://news.bloomberglaw.com/business-and-practice/pro-bono-innovators-2024-honoree-paul-weiss-rifkind-wharton-garrison>.

prominent “Paul, Weiss Center to Combat Hate,” a pro bono initiative to fight extremist hate and violence through litigation and advocacy.”<sup>11</sup>

## **B. Paul Weiss’s Deal with President Trump**

On March 14, 2025, President Trump issued a blatantly unlawful executive order that subjected Paul Weiss and its clients to punitive sanctions by the administration. Exec. Order No. 14237, 90 Fed. Reg. 13039 (March 14, 2025) (hereinafter “Executive Order”). In the Executive Order, President Trump accused Paul Weiss of “harmful activity” because it previously employed Robert Mueller and Mark Pomerantz, attorneys who had brought cases against President Trump and his supporters. He also accused Paul Weiss of discrimination, claiming the firm had “‘targets’ based on race and sex.” *Id.* The Executive Order unlawfully ordered the suspension of firm attorneys’ security clearances, prohibited firm employees from entering government buildings, required all government contractors to disclose business with the firm, and subjected their government contracts to agency review, in an effort to punish the firm’s clients and undermine the firm’s business relationships.

This was not President Trump’s first attack on a law firm. On March 6, 2025, he issued a similar executive order against Perkins Coie LLP. Exec. Order 14230, 90 Fed. Reg. 11781 (March 6, 2025). Perkins Coie immediately challenged the order in court and won an early and decisive victory in less than a week, obtaining a temporary restraining order on March 12, 2025—just six days after President Trump issued his order against Perkins Coie, and two days *before* President Trump issued his order against Paul Weiss. Perkins Coie obtained a permanent injunction against the order against it on May 2, 2025.<sup>12</sup> *Perkins Coie LLP v. U.S. Dep’t of Just.*, 783 F. Supp. 3d 105, 105 (D.D.C. 2025), *appeal docketed*, No. 25-5241 (D.C. Cir. July 2, 2025) [hereinafter *Perkins Coie D.D.C. Opinion*]; *Perkins Coie LLP v. U.S. Dep’t of Justice*, Order No. CV 25-716 (BAH) (Mar. 12, 2025) [hereinafter *Perkins Coie TRO Order*].

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<sup>11</sup> *Paul, Weiss Hosts Event to Introduce The Center to Combat Hate*, Paul, Weiss Center to Combat Hate (May 14, 2024), <https://centertocombathate.com/news/paul-weiss-hosts-event-to-introduce-center-to-combat-hate>; Jacob Knutson, *Paul, Weiss Said It Felt ‘Called Upon’ to Launch a Center to Fight Hate. Now It Won’t Talk About It.*, Democracy Docket (March 31, 2025), <https://www.democracymarket.com/news-alerts/paul-weiss-trump-executive-order-deal-center-to-combat-hate>.

<sup>12</sup> In her May 2, 2025 ruling, Judge Howell of the District Court of the District of Columbia, issued a sharp rebuke of the Trump administration: “The importance of independent lawyers to ensuring the American judicial system’s fair and impartial administration of justice has been recognized in this country since its founding era. . . . The instant case presents an unprecedented attack on these foundational principles . . . . Using the powers of the federal government to target lawyers for their representation of clients and avowed progressive employment policies in an overt attempt to suppress and punish certain viewpoints . . . is contrary to the Constitution.” *Perkins Coie D.D.C. Opinion*, 783 F. Supp. 3d at 118.

In the weeks that followed, President Trump continued to issue orders against law firms Jenner & Block LLP, Wilmer Cutler Pickering Hale and Dorr LLP (“WilmerHale”), and Susman Godfrey L.L.P. *See* Exec. Order 14246, 90 Fed. Reg. 13997 (March 25, 2025) (Addressing Risks from Jenner & Block); Exec. Order 14250, 90 Fed. Reg. 14549 (March 27, 2025) (Addressing Risks from WilmerHale); Exec. Order 14263 90 Fed. Reg. 15615 (April 9, 2025) (Addressing Risks from Susman Godfrey). He also threatened to issue more orders. *See Perkins Coie D.D.C. Opinion*, 783 F. Supp. 3d at 156.<sup>13</sup> But, unlike Paul Weiss, these three law firms all sued, and like Perkins Coie, all three obtained swift court orders to block those orders.<sup>14</sup> In fact, it only took two hours for Susman Godfrey attorneys to unanimously agree to fight the executive order in court.<sup>15</sup>

The executive orders are blatantly unconstitutional. The four judges who have ruled on the four court challenges brought by these law firms have unanimously held that the executive orders violated the First Amendment protections against retaliation for protected expression and viewpoint discrimination.<sup>16</sup> The executive orders were also variably found to violate the First Amendment freedom of association and the right to petition the government<sup>17</sup>; the

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<sup>13</sup> Under Trump’s orders to look at law firm’s diversity, equity, and inclusion policies, the Equal Employment Opportunity Commission (EEOC) also announced baseless investigations of twenty law firms. Press Release, U.S. Equal Emp’t Opportunity Comm’n, *EEOC Acting Chair Andrea Lucas Sends Letters to 20 Law Firms Requesting Information About DEI-Related Employment Practices* (Mar. 17, 2025), <https://www.eeoc.gov/newsroom/eeoc-acting-chair-andrea-lucas-sends-letters-20-law-firms-requesting-information-about-dei>.

<sup>14</sup> Zach Montague, *Judge Strikes Down Trump Order Targeting Another Top Law Firm*, N.Y. Times (June 27, 2025), <https://www.nytimes.com/2025/06/27/us/politics/trump-susan-godfrey-law-firm-order.html>. The Justice Department filed a motion to dismiss its appeal of the law firm cases, but then abruptly reversed itself. Josh Dawsey, C. Ryan Barber, and Sadie Gurman, *Trump Ordered Justice Department Reversal on Law Firm Sanctions*, Wall St. J. (March 11, 2026), <https://www.wsj.com/politics/policy/trump-ordered-justice-department-reversal-on-law-firm-sanctions-f137f164>. On March 16, 2026, the appeals court granted the Justice Department’s request to withdraw the motion, allowing the appeals to remain pending. Kaelan Deese, *Court allows DOJ to proceed with appeal over law firm executive orders*, Wash. Exam’r (March 16, 2026), <https://www.washingtonexaminer.com/news/justice/4493511/court-allows-doj-proceed-appeal-law-firm-executive-orders>.

<sup>15</sup> Jack Newsham and Jacob Shamsian, *Donald Trump went after one of America’s top law firms. Its decision to fight back took just two hours.*, Bus. Insider (April 27, 2025), <https://www.businessinsider.com/donald-trump-big-law-executive-orders-decisions-damage-2025-4>.

<sup>16</sup> *Perkins Coie D.D.C. Opinion*, 783 F. Supp. 3d at 150-65; *Susman Godfrey LLP v. Exec. Off. of President*, 789 F. Supp. 3d 15, 41-48 (D.D.C. 2025), *appeal docketed*, No. 25-5310 (D.C. Cir. Aug. 26, 2025) [hereinafter *Susman Godfrey D.D.C. Opinion*]; *Wilmer Cutler Pickering Hale & Dorr LLP v. Exec. Off. of President*, 784 F. Supp. 3d 127, 150-52 (D.D.C. 2025), *amended sub nom. Wilmer Cutler Pickering Hale & Dorr LLP v. Exec. Off. of the President*, No. CV 25-917 (RJL), 2025 WL 2105262 (D.D.C. June 26, 2025), *appeal docketed*, No. 25-5277 (D.C. Cir. July 28, 2025) [hereinafter *WilmerHale D.D.C. Opinion*]; *Jenner & Block LLP v. U.S. Dep’t of Just.*, 784 F. Supp. 3d 76, 93-113 (D.D.C. 2025), *appeal docketed*, No. 25-5265 (D.C. Cir. July 22, 2025).

<sup>17</sup> *Perkins Coie D.D.C. Opinion*, 783 F. Supp. 3d at 165-66, 171-74; *Susman Godfrey D.D.C. Opinion*, 789 F. Supp. 3d at 48-49; *WilmerHale D.D.C. Opinion*, 784 F. Supp. 3d at 155-59.

Fifth Amendment’s right to procedural due process<sup>18</sup> and equal protection,<sup>19</sup> prohibition against vague laws,<sup>20</sup> and right to counsel<sup>21</sup>; the Sixth Amendment’s right to counsel<sup>22</sup>; and the separation of powers embedded in the structure of the Constitution.<sup>23</sup>

Despite the fact that a court had already issued a TRO to block the Perkins Coie executive order, and despite the blatant unconstitutionality of the action against Paul Weiss, Paul Weiss chose to forego litigation and to strike a deal instead to exchange valuable services in return for a rescission of the Executive Order. On March 19, 2025, Brad Karp, longtime Chairman of Paul Weiss, attended a lengthy, 90-minute meeting in the White House with President Trump, where the two had a “prolonged discussion of golf” and explored the contours of the concessions Paul Weiss was willing to offer.<sup>24</sup> The deal was announced by President Trump on March 20, 2025 in a Truth Social post<sup>25</sup> and committed Paul Weiss to: refraining from denying representing clients based on political views; taking on pro bono matters that “represent the full spectrum of political viewpoints in our society” (a requirement widely understood to indicate a commitment to taking on Trump-approved clients and causes); abandoning diversity, equity, and inclusion policies and conducting an audit of its employment practices; and dedicating \$40 million in pro bono legal services to Trump’s preferred initiatives and clients. President Trump also stated that Karp acknowledged the “wrongdoing” of Mark Pomerantz as part of the negotiation. Once he obtained these favors from Paul Weiss, President Trump revoked the unlawful executive order on March 21, 2025. Exec. Order 14244, 90 Fed. Reg. 13685 (March 21, 2025).

On March 23, 2025, Karp sent an email to Paul Weiss employees explaining the decision to make these concessions to President Trump.<sup>26</sup> In the email, Karp

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<sup>18</sup> *Perkins Coie* D.D.C. Opinion, 783 F. Supp. 3d at 171-74; *Susman Godfrey* D.D.C. Opinion, 789 F. Supp. 3d at 49-51; *WilmerHale* D.D.C. Opinion, 784 F. Supp. 3d at 163-64.

<sup>19</sup> *Perkins Coie* D.D.C. Opinion, 783 F. Supp. 3d at 166-68; *Susman Godfrey* D.D.C. Opinion, 789 F. Supp. 3d at 52-53; *contra WilmerHale* D.D.C. Opinion, 784 F. Supp. 3d at 166-67.

<sup>20</sup> *Perkins Coie* D.D.C. Opinion, 783 F. Supp. 3d at 174-77; *Susman Godfrey* D.D.C. Opinion, 789 F. Supp. 3d at 51-52; *WilmerHale* D.D.C. Opinion, 784 F. Supp. 3d at 164-66.

<sup>21</sup> *Perkins Coie* D.D.C. Opinion, 783 F. Supp. 3d at 168-71; *Susman Godfrey* D.D.C. Opinion, 789 F. Supp. 3d at 53-54; *contra WilmerHale* D.D.C. Opinion, 784 F. Supp. 3d at 167-68.

<sup>22</sup> *Perkins Coie* D.D.C. Opinion, at 783 F. Supp. 3d 168-71; *WilmerHale* D.D.C. Opinion, 784 F. Supp. 3d at 169-170.

<sup>23</sup> *Susman Godfrey* D.D.C. Opinion, 789 F. Supp. 3d at 54-55; *WilmerHale* D.D.C. Opinion, 784 F. Supp. 3d at 159-61.

<sup>24</sup> Ruth Marcus, *How Donald Trump Throttled Big Law*, *New Yorker* (March 27, 2025), <https://www.newyorker.com/news/the-lede/how-donald-trump-throttled-big-law>.

<sup>25</sup> Donald J. Trump (@realDonaldTrump), Truth Social (March 20, 2025 at 6:10PM), <https://truthsocial.com/@realDonaldTrump/posts/114197044617921519>; Daniel Barnes, *White House strikes deal with major law firm to lift sanctions*, *Politico* (March 20, 2025), <https://www.politico.com/news/2025/03/20/white-house-law-firm-sanctions-026866>.

<sup>26</sup> Lauren Edmonds, *Read the email Paul Weiss Chairman Brad Karp sent to staff after striking a deal with Trump: 'Clients perceived our firm as being persona non grata'*, *Bus. Insider* (March 23,

claimed the executive order posed “an unprecedented threat to our firm unlike anything” the firm had faced since its founding and “could easily have destroyed our firm.” Karp claimed the law firm would not “survive a protracted dispute with the Administration.” He also argued that the deal does not “compromise our core values and fundamental principles,” attempting to frame the deal as merely a recommitment to existing priorities and principles, directly contradicting the dramatic changes that President Trump trumpeted in his Truth Social post. Further, Karp claimed that this deal was in the clients’ best interests and the best interests of Paul Weiss employees. It seems some of those employees disagreed; since the deal announcement, the firm has lost at least 10 partners in the litigation department, including some on its management committee who started their own boutique firm and took several major clients with them.<sup>27</sup> The leader of its pro bono practice resigned within weeks of the deal’s announcement.<sup>28</sup> Paul Weiss has also come under significant external criticism. For example, in March 2025, a group of more than 140 Paul Weiss alumni sent and published a letter to Karp protesting the deal, accusing the firm of becoming a “poster child for the administration’s efforts to silence dissent and impose a loyalty test on attorneys” and seeking “to gain profit by forfeiting its soul.”<sup>29</sup> Granddaughters of the name partner Judge Simon Rifkind also wrote a letter to Karp accusing him of twisting Rifkind’s words in his “1963 Principles for Paul, Weiss” to enable further attacks the rule of law.<sup>30</sup>

There was little evidence at the time that the firm was likely to be “destroyed.” It appears that at least one high profile client dropped Paul Weiss as defense counsel at the time of the Executive Order, worried they might damage their case if prosecutors refuse to liaise with the firm.<sup>31</sup> However, Paul Weiss was and remains a powerful and lucrative firm. Moreover, a court had *already* paused a substantially similar executive order against Perkin Coie. See, *Perkins Coie* TRO Order. All four firms that sued quickly have succeeding in halting the executive

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2025), <https://www.businessinsider.com/paul-weiss-brad-karp-email-staff-trump-deal-executive-order-2025-3>.

<sup>27</sup> Daniel Barnes, *Inside the fallout at Paul, Weiss after the firm’s deal with Trump*, Politico (June 29, 2025), <https://www.politico.com/news/2025/06/29/paul-weiss-brad-karp-trump-fallout-00420354>.

<sup>28</sup> Jessica Silver-Greenberg and Matthew Goldstein, *Top Pro Bono Leader Resigns from Paul Weiss, a Firm Hit in Trump’s Crackdown on Big Law*, N.Y. Times (April 9, 2025), <https://www.nytimes.com/2025/04/09/business/paul-weiss-steven-banks-trump.html>.

<sup>29</sup> Letter from Paul Weiss Alumni to Brad Karp, Chairman, Paul, Weiss, Rifkind, Wharton & Garrison LLP (March 24, 2025), available at <https://www.commoncause.org/wp-content/uploads/2025/03/Paul-Weiss-alumni-letter.docx.pdf>.

<sup>30</sup> Letter from Amy Rifkind and Nina Rifkind to Brad Karp, Chairman, Paul, Weiss, Rifkind, Wharton & Garrison LLP (March 27, 2025), available at <https://www.nytimes.com/interactive/2025/04/02/us/paul-weiss-letter-32725-2.html>.

<sup>31</sup> Richard Vanderford, *Law Firm in Trump’s Crosshairs Fired by White-Collar Client*, Wall St. J. (March 19, 2025), <https://www.wsj.com/articles/law-firm-in-trumps-crosshairs-fired-by-white-collar-client-082bf6da>.

orders, and none were “destroyed.”<sup>32</sup> In fact, Jenner & Block even successfully recruited a high-profile partner away from Paul Weiss in the aftermath of the deal: Damian Williams, former U.S. attorney for the Southern District of New York.<sup>33</sup>

While those firms showed how law firms can defend their constitutional rights and those of their clients, Paul Weiss was the first law firm to make a deal with President Trump in exchange for rescission of the order. Once Paul Weiss capitulated, President Trump and his associates used that deal as a template to pressure eight more law firms into reaching similar deals in quick succession, leveraging the same threats of punishing executive orders, onerous investigation processes, and the revelation of employee information to a hostile administration. *See Perkins Coie D.D.C. Opinion*, at 156 (“What is clear is that the Trump White House has publicly touted . . . that those deal-making firms have been spared, or had revoked, an Executive Order targeting them.”). These firms included Allen Overy Shearman Sterling LLP; Kirkland & Ellis LLP; Latham & Watkins LLP; Milbank LLP; Simpson Thacher & Bartlett LLP; Skadden, Arps, Slate, Meagher & Flom LLP; and Willkie Farr & Gallagher LLP. In total, these law firms pledged nearly \$1 billion in legal services towards President Trump’s preferred causes in return for safe harbor against the unconstitutional punitive measures that other firms continued to face.<sup>34</sup>

These funds were not disbursed to the government—they were not fines or formal remedies and indeed they could not be: none of the firms’ disfavored conduct warranted sanction and the orders themselves were blatantly unconstitutional. President Trump himself later stated that these firms had done “nothing wrong.”<sup>35</sup> Instead, these were tailored offerings of service to President Trump and his allies, providing President Trump with political and personal benefits in order to extract specific government action and favor. President Trump has made it clear that the firms will be expected to do his bidding, including by defending police officers who

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<sup>32</sup> Zach Montague, *Judge Strikes Down Trump Order Targeting Another Top Law Firm*, N.Y. Times (June 27, 2025), <https://www.nytimes.com/2025/06/27/us/politics/trump-susan-godfrey-law-firm-order.html>.

<sup>33</sup> Matthew Goldstein and Jessica Silver-Greenberg, *Paul Weiss Loses Another Prominent Lawyer in Wake of Trump Deal*, N.Y. Times (June 6, 2025), <https://www.nytimes.com/2025/06/06/business/paul-weiss-trump-law-firms-damian-williams.html>.

<sup>34</sup> Sam Baker, *Law firms pledge almost \$1 billion in free work to Trump*, Axios (April 12, 2025), <https://www.axios.com/2025/04/12/big-law-pro-bono-legal-work-trump>; Jeffrey Toobin, *Trump’s Next Move After the Law Firms Surrender*, N.Y. Times (May 19, 2025), <https://www.nytimes.com/2025/05/19/opinion/trump-law-firms.html>; Rebecca Beitsch, *Law firms divided over response to Trump orders*, Hill (Mar. 25, 2025), <https://thehill.com/regulation/court-battles/5211686-trump-administration-targets-law-firms>; Daniel Barnes, *Major Law Firm Strikes Preemptive Deal with White House*, Politico (Mar. 28, 2025), <https://www.politico.com/news/2025/03/28/skadden-arps-trump-law-deal-028324>.

<sup>35</sup> Associated Press, *LIVE: Trump signs executive orders aimed at boosting coal*, YouTube (Apr. 8, 2025), <https://www.youtube.com/watch?v=k66iBAeQwEk> (at 31:40).

are accused of abusing civilians.<sup>36</sup> His understanding of what type of “pro bono” the firms would provide him included representing the administration on trade deals and representing him in a personal capacity.<sup>37</sup>

It appears that Paul Weiss has taken specific steps to satisfy the terms of the agreement, though the precise terms of the settlement have not been disclosed. Paul Weiss took down its Center to Combat Hate website, bringing it back online only after media inquiries, and the firm also removed information on its website about its pro bono work on immigration, voting rights, LGBTQ issues, and reproductive rights.<sup>38</sup> Paul Weiss has also been reported to be providing free legal work to the Commerce Department.<sup>39</sup> More broadly, law firms that reached deals with President Trump have been subject to demands for free legal representation from President Trump’s allies and conservative, partisan organizations.<sup>40</sup> It is not yet known what other clients the firm has taken on in satisfaction of its promise of \$40 million in legal services, nor what attorneys have been negatively affected by its revised hiring practices, nor what clients it has declined to take on to satisfy the full terms of the deal.

To date, Paul Weiss has not released any public statement disavowing its deal with President Trump.

## II. VIOLATIONS OF THE NEW YORK RULES OF PROFESSIONAL CONDUCT

New York’s Rules of Professional Conduct governs all attorneys who are licensed in New York, including many, if not all, of the managing partners who entered into negotiations with and ultimately made concessions to President Trump (by and through his close advisors or attorneys) in order to obtain rescission of an unlawful and punitive executive order that President Trump had issued against the

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<sup>36</sup> Jessical Silver-Greenberg et al., *Trump Allies Look to Benefit from Pro Bono Promises By Elite Law Firms*, N.Y. Times (May 25, 2025), <https://www.nytimes.com/2025/05/25/business/trump-law-firms-pro-bono.html>.

<sup>37</sup> Michael S. Schmidt & Maggie Haberman, *Law Firms That Settled With Trump Are Asked to Help on Trade Deals*, N.Y. Times (Aug. 13, 2025), <https://www.nytimes.com/2025/08/13/us/politics/trump-law-firms-trade-deals.html>; Michael S. Schmidt, Matthew Goldstein, and Maggie Haberman, *Two Big Law Firms Said to be Doing Free Work for Trump Administration*, N.Y. Times (Aug. 20, 2025), <https://www.nytimes.com/2025/08/20/us/politics/law-firms-free-work-trump-administration.html>.

<sup>38</sup> Jacob Knutson, *Paul, Weiss Said It Felt ‘Called Upon’ to Launch a Center to Fight Hate. Now It Won’t Talk About It.*, Democracy Docket (March 31, 2025), <https://www.democracydocket.com/news-alerts/paul-weiss-trump-executive-order-deal-center-to-combat-hate>; Katelyn Polantz, *Trump’s crackdown on law firms is chilling the future of pro bono legal work*, CNN (May 7, 2025), <https://www.cnn.com/2025/05/07/politics/trump-law-firm-crackdown-pro-bono-work>.

<sup>39</sup> Schmidt, Goldstein, & Haberman, *supra* note 37.

<sup>40</sup> Silver-Greenberg et al., *supra* note 36; Justin Henry, *Heritage-Linked Group Says Big Law Replying to Its Pro Bono Asks*, Bloomberg Law (May 14, 2025), <https://news.bloomberglaw.com/business-and-practice/heritage-linked-group-says-big-law-replying-to-its-pro-bono-asks>.

firm. These ethical requirements stand as a cornerstone of the profession, inextricably linked to justice and the rule of law. These violations not only have had wide-ranging consequences for Paul Weiss attorneys, clients, and potential clients, but also for the practices of large law firms in this country; a recent study by Reuters suggests that law firms across the board have changed their practices and agendas in the aftermath of the executive orders and the subsequent deals.<sup>41</sup> Individual lawyers—many of whom built long-term careers at Paul Weiss—left the firm after Paul Weiss reached its deal with President Trump.<sup>42</sup> The deal also served as a blueprint for other law firms’ concessionary agreements with the Trump administration.

The conduct of Paul Weiss, Brad Karp and other attorneys in its management committee, in reaching and then satisfying the terms of the deal appear to have violated several of New York’s Rules of Professional Conduct.

### **A. Rule 8.4(b)—Illegal Conduct**

Rule 8.4, which governs attorney misconduct, states that a lawyer or law firm shall not “(b) engage in illegal conduct that adversely reflects on the lawyer’s honesty, trustworthiness or fitness as a lawyer.”

A criminal conviction or trial outside of disciplinary proceedings is not required in order to find that an attorney violated their ethical obligations.<sup>43</sup> Rule 8.4 has been used to discipline an attorney in the absence of a conviction,<sup>44</sup> though it is often combined with other rules to suspend or disbar an attorney.<sup>45</sup> Here, Paul Weiss likely violated prohibitions against bribery and extortion by entering an illegal agreement with President Trump, and they later may have violated the Antideficiency Act by providing free services to the federal government in fulfilling their illegal agreement.

Bribery of a public official is prohibited by 18 U.S.C. § 201(b)(1). President Trump’s decisions to issue, not issue, or withdraw executive orders and his

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<sup>41</sup> Mike Spector *et al.*, *How Trump’s crackdown on law firms is undermining legal defenses for the vulnerable*, Reuters (July 31, 2025), <https://www.reuters.com/investigations/trumps-war-big-law-leads-firms-retreat-pro-bono-work-underdogs-2025-07-31>.

<sup>42</sup> Kathryn Rubino, *Paul Weiss Insists Everything Is Fine, Despite All Evidence That Things Are Not, In Fact, Fine*, Above the Law (June 16, 2025), <https://abovethelaw.com/2025/06/paul-weiss-insists-everything-is-fine-despite-all-evidence-that-things-are-not-in-fact-fine>.

<sup>43</sup> See *Matter of Linn*, 79 N.Y.S.3d 182, 183 (N.Y. App. Div. 2018) (involving Rules 1.2(d), 1.7(a)(2), and 8.4(b) and (h) where an attorney purchased heroin from a client); *Matter of Cassidy*, 118 N.Y.S.3d 35, 36 (N.Y. App. Div. 2020) (involving rules 1.2(d), 1.15(b)(1), 1.15(d)(1) and (2), 1.15(e), 1.8, 8.4(c), and 8.4(h) in a case involving misuse of escrow accounts, false testimony, and failure to maintain required bookkeeping records).

<sup>44</sup> See, e.g., *Matter of Schneiderman*, 144 N.Y.S.3d 436, 438-40 (ordering one year suspension for an attorney who admitted to verbal and emotional abuse and unwanted physical contact with women).

<sup>45</sup> See, e.g., *Matter of Giuliani*, 214 N.Y.S.3d 366, 375-81 (citing multiple rules, including Rule 8.4(b), as a basis for disbarment); *Matter of Braccini*, 195 N.Y.S.3d 560, 562 (N.Y. App. Div. 2023) (same).

directives to subordinates to take specific actions, constitute official acts.<sup>46</sup> The promises made by Paul Weiss constitute the *quid pro quo* element of federal bribery laws—namely the acceptance of a “thing of value in exchange for official action.” *United States v. Terry*, 707 F.3d 607, 614 (6th Cir. 2013). Though individuals and organizations routinely negotiate settlements with federal prosecutors and regulatory agencies, Paul Weiss’s deal was not a typical “settlement” of legal claims by any measure. The deal primarily provided personal and political benefit to President Trump, did not involve the typical agency personnel or review processes. The agreement does not appear to have been in writing. And there is no official investigation or case that has been laid to rest by the agreements—which means nothing prevents President Trump from releasing another executive order to encourage more “deals.”

Extortion is unlawful pursuant to the Hobbs Act. 18 U.S.C. § 1951. Individuals who pay an extortion demand may be criminally liable for aiding or abetting a public official in committing extortion. 18 U.S.C. § 2(a) (“Whoever commits an offense against the United States or aids, abets, counsels, commands, induces or procures its commission, is punishable as a principal”); *see, e.g., United States v. Torcasio*, 959 F.2d 503, 505 n.1 (4th Cir. 1992), amended, 993 F.2d 368 (4th Cir. 1993). Paul Weiss promised \$40 million towards President Trump’s favored causes “with the expectation of obtaining favorable action,” *Torcasio*, 959 F.2d at 506, specifically rescission of the executive order. The promise therefore likely constitutes extortion by President Trump and his associates. Though Paul Weiss may claim that it cannot be party to its own extortion, the U.S. Supreme Court has previously found a payor guilty of conspiring to commit Hobbs Act extortion under 18 U.S.C. § 371, the general federal conspiracy statute. *Ocasio v. United States*, 578 U.S. 282, 287-292 (2016); *see also, United States v. Nelson*, 486 F. Supp. 464, 486 (W.D. Mich. 1980) (“... a payor of money which has been extorted ‘under color of official right’ in violation of the Hobbs Act, can, in certain cases, be charged under 18 U.S.C. § 2(a) with aiding and abetting that crime.”). Paul Weiss’s agreement with President Trump was voluntary; indeed, the fact that the firm actively considered litigation to challenge the order, and the fact that other firms in similar positions chose to fight the blatantly unconstitutional executive orders, demonstrate that Paul Weiss had other, lawful options. And the services given in exchange for political favor were for President Trump’s political and personal benefit, not in the public interest.

The Antideficiency Act prohibits any officer or employee of the U.S. government from accepting voluntary services on behalf of the government except in very limited circumstances. 31 U.S.C. §§ 1341-1342, 1511-1519. Paul Weiss has reportedly provided free legal services to the Commerce Department, which may

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<sup>46</sup> See *McDonnell v. United States*, 579 U.S. 550, 578 (2016) (holding that for purposes of construing § 201, an “official act” requires that “the public official must make a decision or take an action” on “something specific and focused that is ‘pending’ or ‘may by law be brought’” before a public official”).

violate the Antideficiency Act unless it is shown that its services are authorized pursuant to one of the law’s exceptions, *see* 5 U.S.C. § 3109 (permitting experts and consultants to serve without compensation with a written record of the agreement or as authorized by statute).

Conduct that violates these criminal laws “adversely reflects on the lawyer’s honesty, trustworthiness or fitness as a lawyer,” in violation of Rule 8.4(b).

### **B. Rule 1.7(a)(2)—Conflicts of Interest**

Per N.Y. RPC 1.7(a)(2), a lawyer shall not represent a client if “there is a significant risk that the lawyer’s professional judgment on behalf of a client will be adversely affected by the lawyer’s own financial, business, property or other personal interests.”

In acquiescing to President Trump’s demands, Paul Weiss has now created unavoidable conflicts of interests as the firm seeks to avoid cases and causes that might go against the Trump administration’s preferences. Much of the litigation handled by Paul Weiss has historically been against the federal government or for causes that President Trump may not agree with. Therefore, the agreement likely constitutes a “material limitation on the firm’s representation of a vast array of clients in civil litigation, transactional, and advisory matters.” N.Y. RPC 1.7(a)(2).

N.Y. RPC 1.7(b) contains exceptions permitting a lawyer to represent an affected client if they obtain their informed consent. However, the exact contours of the agreements between the law firms, including Paul Weiss, and President Trump appear to be vague and unspecific.<sup>47</sup> Further, those deals, rather than foreclosing further meddling from the Trump administration, appear to open the door to ongoing dialogue, oversight, and approval of law firm activities from the Trump administration as part of the deals’ enforcement. It is hard to conceive how any client would ever be able to provide truly informed consent to such an amorphous, evolving conflict of interest. It is even less conceivable if the affected clients are low-resource individuals and communities, the traditional recipients of legal pro bono efforts.

### **C. Rule 8.4(a)—Rules Violation and Inducement**

N.Y. RPC 8.4(a) states that a law firm shall not “violate or attempt to violate the Rules of Professional Conduct, knowingly assist or induce another to do so, or do so through the acts of another.” In violating Rules 8.4(b) and 1.7(a)(2), Paul Weiss

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<sup>47</sup> Carrie Johnson, *Trump's deals with law firms are like deals 'made with a gun to the head,' lawyers say*, NPR (May 31, 2025), <https://www.npr.org/2025/05/31/nx-s1-5406173/trump-deals-law-firms>; Matthew Goldstein, Jessica Silver-Greenberg, and Ben Protess, *Paul Weiss Chair Says Deal With Trump Adheres to Firm’s Principles*, N.Y. Times (March 21, 2025), <https://www.nytimes.com/2025/03/21/business/paul-weiss-memo-trump-deal.html>.

and its decision-making attorneys have violated the Rules of Professional Conduct, triggering a violation of Rule 8.4(a). In addition, by making this agreement on behalf of the firm, Paul Weiss may have created scenarios where attorneys in its employ are induced to violate the Rules of Professional Conduct by participating in the satisfaction of the illegal agreement Paul Weiss made with President Trump.

### III. CONCLUSION

For the reasons set forth above, Free Speech For People respectfully requests that the Attorney Grievance Committee take the following actions: first, that it open an investigation into whether Paul Weiss has violated the New York Rules in making and satisfying its deal with President Trump; and second, that it take appropriate action if warranted by the evidence gathered in the investigation, including, but not limited to, ordering Paul Weiss to cease and desist its satisfaction of the commitments it made to President Trump. As part of this investigation, the Committee should explore and appropriately sanction specific attorneys at Paul Weiss who were instrumental in facilitating the deal with President Trump.

In failing to uphold their ethical obligations, Paul Weiss and attorneys in its management committee have violated the expectations of a member of the New York Bar. Because of the serious nature of the conduct involved, we request that the Committee act with urgency.

Sincerely,

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