

Sent via mail and email

May 28, 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

Re: Request for Ethics Investigation into Simpson Thacher & Bartlett LLP

Dear Attorney Grievance Committee Members and Chief Attorney Jorge Dopico:

Free Speech For People¹ respectfully requests that the Attorney Grievance Committee investigate Simpson Thacher & Bartlett LLP (“Simpson Thacher”), headquartered at 425 Lexington Avenue, New York, NY 10017, 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 Chair of the Executive Committee Alden Millard (Bar No. 3027018) and General Counsel Paul C. Gluckow (Bar No. 2767218), and other attorney members of the firm’s executive committee who participated in agreeing to and satisfying the agreement with Trump. In entering and taking steps to satisfy an illegal agreement with Trump, Simpson Thacher 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).

In addition, the Committee should investigate attorneys at Simpson Thacher who represented Paramount Global in its merger with Skydance Media. The merger required approval by the Federal Communications Commission (FCC). While approval was pending, Paramount made significant concessions to Trump and abruptly settled Trump’s baseless personal lawsuit against the company. The deal included other concessions, including \$20 million in programming and advertising from Skydance to Trump or his preferred topics, terminating diversity initiatives at Paramount, and hiring an ombudsman to investigate purported “political bias” at Paramount subsidiary CBS. The FCC approved the merger soon thereafter. If investigation finds that Simpson Thacher attorneys in any way facilitated Paramount’s settlement with Trump or other promises in exchange for regulatory

¹ 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.

approval from the Trump administration, those attorneys would have violated Rule 1.2(d) (assisting a client with illegal conduct) and Rule 8.4(b) (illegal conduct, particularly bribery).²

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.

A. Simpson Thacher's History

Simpson Thacher, founded in 1884, employs approximately 2,000 lawyers across 14 global offices who work across 32 major practice areas and “almost every industry sector.”³ In 2025, the firm’s global revenue increased 22.5% to \$3.55 billion; equity partners received \$8.57 million in profits.⁴

In 2025, Simpson Thacher reported a total of 47,151 hours of pro bono across its U.S. offices, averaging 27 annual hours per attorney.⁵ Whitney North Seymour, who led the firm from the 1930s until 1983 and was known as a “liberal champion of unpopular causes and a recognized authority in the field of civil liberties,” shaped the organization’s approach to pro bono service.⁶ In recent years, Simpson Thacher has challenged racial gerrymandering,⁷ fought to prevent forced religious

² Free Speech For People has submitted complaints against three other law firms and received a response on May 14, 2026 stating that the Committee is deferring such investigations until there are final judicial determinations in related litigation. We respectfully request that the Committee address these ethical issues within its power urgently rather than allowing them to remain unresolved for months, possibly years. Swift consequences for ethics violations strongly deter future violations and minimize harm to the public and to our democratic institutions. That said, this complaint against Simpson Thacher differs from the previous submitted complaints as it includes allegations related to the Paramount-Skydance merger.

³ *About Us*, Simpson Thacher & Bartlett LLP, <https://www.stblaw.com/about-us> (last visited May 27, 2026).

⁴ Kate Peacock, *Simpson Thacher passes \$3bn mark with double-digit revenue and PEP growth*, Legal Business (Apr. 8, 2026), <https://www.legalbusiness.co.uk/law-firms/simpson-thacher-passes-3bn-mark-with-double-digit-revenue-and-pep-growth>.

⁵ *The 2025 survey of pro bono hours*, Chambers Associate, <https://www.chambers-associate.com/law-firms/pro-bono-hours> (accessed Apr. 15, 2026).

⁶ Albin Krebs, *Whitney North Seymour Sr., Led Bar Group*, N.Y. Times (May 22, 1983), <https://www.nytimes.com/1983/05/22/obituaries/whitney-north-seymour-sr-led-bar-group.html>.

⁷ Nate Raymond, *Mississippi Supreme Court election map dilutes Black voters' power, judge rules*, Reuters (Aug. 20, 2025), <https://www.reuters.com/legal/government/mississippi-supreme-court-election-map-dilutes-black-voters-power-judge-rules-2025-08-20>.

observance in public schools,⁸ and taken on cases to protect immigrants, the LGBTQ community, the environment, and civil rights.⁹

B. Trump's Attacks on Law Firms

Early in his second term, Trump began to unlawfully subject large law firms to punitive orders and baseless agency investigations. On February 25, 2025, he suspended the security clearances of Covington & Burling LLP employees and ordered government agencies to evaluate their contracts with the firm, because it had represented Jack Smith. Memorandum on Suspension of Security Clearances and Evaluation of Government Contracts, 2025 Daily Comp. Pres. Doc. 303 (Feb. 25, 2025).¹⁰

On March 6, 2025, Trump issued a blatantly unlawful executive order against Perkins Coie LLP that subjected the firm and its clients to punitive sanctions by the administration. Exec. Order 14230, 90 Fed. Reg. 11781 (Mar. 6, 2025). The executive order accused Perkins Coie of “dishonest and dangerous activity” for undertaking lawful legal actions, properly defending its clients in court, and committing to fair and diverse hiring practices. 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, subjected their government contracts to agency review, prohibited agency officials from hiring employees of Perkins Coie, and ordered the Equal Employment Opportunity Commission (“EEOC”) to investigate the firm, all in an effort to punish the firm, its attorneys, and its clients, and to undermine the firm’s business relationships. Perkins Coie immediately challenged

⁸ *Matter Highlights: Appeals Court Upholds Ruling Blocking Louisiana Public School Ten Commandments Law*, Simpson Thacher & Bartlett LLP (June 23, 2025), <https://www.stblaw.com/about-us/news/view/2025/06/23/appeals-court-upholds-ruling-blocking-louisiana-public-school-ten-commandments-law>; *Matter Highlights: Federal District Court Issues Preliminary Injunction Prohibiting Mandatory Placement of Ten Commandments in Arkansas Public Schools*, Simpson Thacher & Bartlett LLP (Aug. 6, 2025), <https://www.stblaw.com/about-us/news/view/2025/08/06/federal-district-court-issues-preliminary-injunction-prohibiting-mandatory-placement-of-ten-commandments-in-arkansas-public-schools>; *Matter Highlights: Federal District Court Issues Preliminary Injunction Prohibiting Mandatory Placement of Ten Commandments in Texas Public Schools*, Simpson Thacher & Bartlett LLP (Aug. 20, 2025), <https://www.stblaw.com/about-us/news/view/2025/08/20/federal-district-court-issues-preliminary-injunction-prohibiting-mandatory-placement-of-ten-commandments-in-texas-public-schools>; Tatyana Monnay, *Simpson Thacher Racks Up Pro Bono Wins in Wake of Trump Deal*, Bloomberg L. (Aug. 20, 2025), <https://news.bloomberglaw.com/business-and-practice/simpson-thacher-racks-up-pro-bono-wins-in-wake-of-trump-deal>.

⁹ *About Us: Pro Bono*, Simpson Thacher & Bartlett LLP, <https://www.stblaw.com/about-us/pro-bono> (last visited May 27, 2026).

¹⁰ Covington did not litigate to block the order nor negotiate with Trump; the firm continued to represent Jack Smith. Kelsey Walsh, *Trump signs executive action targeting law firm representing former special counsel Jack Smith*, ABC News (Feb. 25, 2025), <https://abcnews.com/Politics/trump-signs-executive-action-targeting-law-firm-representing/story?id=119190846>.

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. Perkins Coie obtained a permanent injunction against the order against it on May 2, 2025.¹¹ *Perkins Coie LLP v. U.S. Dep't of Justice*, Order No. CV 25-716 (BAH) (Mar. 12, 2025) [hereinafter *Perkins Coie TRO Order*]; *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*].

Despite the March 12 ruling, Trump continued to issue orders against other law firms. These include Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul Weiss”); Jenner & Block LLP; Wilmer Cutler Pickering Hale and Dorr LLP (“WilmerHale”); and Susman Godfrey LLP. *See* Exec. Order No. 14237, 90 Fed. Reg. 13039 (Mar. 14, 2025) (Addressing Risks from Paul Weiss); Exec. Order 14246, 90 Fed. Reg. 13997 (Mar. 25, 2025) (Addressing Risks from Jenner & Block); Exec. Order 14250, 90 Fed. Reg. 14549 (Mar. 27, 2025) (Addressing Risks from WilmerHale); Exec. Order 14263 90 Fed. Reg. 15615 (Apr. 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. Jenner & Block, WilmerHale, and Susman Godfrey all sued, and like Perkins Coie, all three obtained swift court orders to block those orders.¹² In fact, it only took two hours for Susman Godfrey attorneys to unanimously agree to fight the executive order in court.¹³

Paul Weiss entered into negotiations with Trump and on March 20, 2025 became the first firm to agree to provide Trump and his allies with valuable services and make significant concessions regarding the firm’s practices in order to

¹¹ 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.

¹² 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. (Mar. 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 (Mar. 16, 2026), <https://www.washingtonexaminer.com/news/justice/4493511/court-allows-doj-proceed-appeal-law-firm-executive-orders>.

¹³ 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 (Apr. 27, 2025), <https://www.businessinsider.com/donald-trump-big-law-executive-orders-decisions-damage-2025-4>.

obtain rescission of the order.¹⁴ Following Paul Weiss's deal template, Skadden, Arps, Slate, Meagher and Flom LLP became the first firm to negotiate a *preemptive* deal with Trump before he issued an executive order against it.¹⁵

The executive orders against law firms were blatantly unconstitutional. All four federal judges who ruled on the court challenges brought by the law firms unanimously held that the executive orders violated the First Amendment protections against retaliation for protected expression and viewpoint discrimination.¹⁶ Those executive orders were also variably found to violate the First Amendment freedom of association and the right to petition the government¹⁷; the Fifth Amendment's right to procedural due process¹⁸ and equal protection,¹⁹ prohibition against vague laws,²⁰ and right to counsel²¹; the Sixth Amendment's right to counsel²²; and the separation of powers embedded in the structure of the Constitution.²³

These executive orders were not the only means by which Trump attempted to punish or undermine law firms. On March 17, 2025, the Equal Employment Opportunity Commission (EEOC) initiated a sweeping investigation into twenty law firms, including Simpson Thacher.²⁴ The EEOC demanded personal information

¹⁴ Daniel Barnes, *White House strikes deal with major law firm to lift sanctions*, Politico (Mar. 20, 2025), <https://www.politico.com/news/2025/03/20/white-house-law-firm-sanctions-026866>.

¹⁵ Melissa Quinn, *Law firm Skadden cuts \$100 million pro bono deal with Trump to avoid executive order*, CBS News (Mar. 28, 2025), <https://www.cbsnews.com/news/law-firm-skadden-cuts-100-million-pro-bono-deal-trump-avoid-executive-order>.

¹⁶ *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).

¹⁷ *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.

¹⁸ *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.

¹⁹ *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.

²⁰ *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.

²¹ *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.

²² *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.

²³ *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.

²⁴ 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,

about each firm’s employees and job applicants, along with detailed information about each firm’s clients.²⁵ Nearly a year later, after law students sued to block the investigations, the EEOC admitted that responding to the information requests had been entirely voluntary.²⁶

C. Simpson Thacher’s Deal with Trump

Trump never issued an executive order targeting Simpson Thacher; the firm was officially subject only to the March 17, 2025 EEOC investigation. Simpson Thacher, despite its “remarkable track record” in litigation,²⁷ chose neither to fight the unconstitutional investigation nor to ascertain whether it was in fact obligated to turn over the records that the EEOC had requested. Instead, on April 11, 2025, Simpson Thacher reached a deal with Trump, apparently in coordination with Kirkland & Ellis LLP (“Kirkland”), Latham & Watkins LLP, and Allen Overy Shearman Sterling LLP.²⁸

As part of this deal, as announced by Trump on Truth Social, Simpson Thacher agreed to provide \$125 million in pro bono legal services towards Trump’s preferred initiatives and clients, “during the Trump administration and beyond.”²⁹ It also agreed to “take on a wide range of pro bono matters that represent the full political spectrum, including Conservative ideals”; refrain from denying representing clients based on political views; and to “not engage in illegal DEI

2025), <https://www.eeoc.gov/newsroom/eeoc-acting-chair-andrea-lucas-sends-letters-20-law-firms-requesting-information-about-dei>.

²⁵ Letter from William E. White & William J.F. Roll III, Co-US General Counsels of A&O Shearman, to Rep. Yassamin Ansari (AZ-03) et al. (May 8, 2025), available at

<https://abovethelaw.com/2025/05/trumps-biglaw-bootlickers-letters-to-congress/2> (“The EEOC inquiry posited that prevailing historical law firm DEI practices may have violated federal anti-discrimination laws and sought extensive information related to those practices. The EEOC’s demands also included detailed personal information regarding the Firm’s employees and applicants for attorney roles at the Firm, as well as extensive information related to the Firm’s clients.”).

²⁶ The law students’ case against the EEOC concluded with a settlement in February 2026, in which the EEOC conceded that its requests for information were “voluntary, that compliance was not mandatory, and that most law firms did not provide any of the requested information.” Stipulation of Dismissal, at 1, *Doe 1 v. Equal Emp’t Opportunity Comm’n*, No. 1:25-cv-01124-RBW (D.D.C. Feb. 9, 2026), Doc. 43; Emilie Shumway, *Legal group claims victory after EEOC ‘retreated’ on law firm DEI letters*, HR Dive (Feb. 10, 2026), <https://www.hrdiver.com/news/eeoc-law-firms-end-lawsuit-dei-practices/811860>.

²⁷ *Litigation*, Simpson Thacher & Bartlett LLP, <https://www.stblaw.com/client-services/practices/litigation> (last visited May 27, 2026).

²⁸ Donald J. Trump (@realDonaldTrump), Truth Social (Apr. 11, 2025 at 12:21PM), <https://truthsocial.com/@realDonaldTrump/posts/114320245355397433> [hereinafter *Trump Apr. 11 Post 1*]; Donald J. Trump (@realDonaldTrump), Truth Social (Apr. 11, 2025 at 12:21PM), <https://truthsocial.com/@realDonaldTrump/posts/114320244770957852> [hereinafter *Trump Apr. 11 Post 2*].

²⁹ *Trump Apr. 11 Post 1*, *supra* note 28; *Trump Apr. 11 Post 2*, *supra* note 28. In the same posts, Trump announced deals with Allen Overy Shearman Sterling LLP, Latham & Watkins LLP, and Kirkland & Ellis LLP for the same amount from each firm.

discrimination and preferences.” In announcing this deal, Trump specifically confirmed that the EEOC had withdrawn its March 17 letter to the firm and would not be investigating the claims therein any further.³⁰ Alden Miller, Chair of the firm’s Executive Committee, informed firm employees that the firm agreed to provide these resources and make these concessions to Trump “[i]n light of the EEOC request and the growing threat of Executive Orders against law firms,” which Gluckow later confirmed in a letter to congressional representatives.³¹

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. Trump himself later stated that these firms had done “nothing wrong.”³² Instead, these were tailored offerings of service to Trump and his allies, providing Trump with political and personal benefits in order to extract specific government action and favor. Trump has made it clear that the firms will be expected to do his bidding, including by defending police officers who are accused of abusing civilians.³³ 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.³⁴

In the aftermath of the firm’s deal with Trump, at least one Simpson Thacher associate, Siunik Moradian, resigned publicly in protest, stating, “By capitulating today, Simpson Thacher joins several other historic, powerful, influential and well-resourced law firms in bending the knee and kissing the ring of authoritarianism.”³⁵ Microsoft dropped Simpson Thacher as its counsel in an active case, replacing the firm with to Jenner & Block, which brought a court case to block Trump’s illegal executive order³⁶; other companies also moved away from firms that, like Simpson

³⁰ *Trump Apr. 11 Post 1*, *supra* note 28; *Trump Apr. 11 Post 2*, *supra* note 28.

³¹ Letter from Paul C. Gluckow, Partner and General Counsel of Simpson Thacher & Bartlett LLP, to Rep. Dave Min, U.S. House of Representatives, et al. (May 8, 2025), available at <https://abovethelaw.com/2025/05/trumps-biglaw-bootlickers-letters-to-congress/2>.

³² Associated Press, *LIVE: Trump signs executive orders aimed at boosting coal* (YouTube, Apr. 8, 2025 at 31:40), <https://www.youtube.com/watch?v=k66iBAeQwEk>.

³³ Jessica 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>.

³⁴ 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 & 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>.

³⁵ Siunik Moradian, LinkedIn (Apr. 11, 2025), <https://www.linkedin.com/posts/siunik-moradian-62685b149-earlier-today-simpson-thacher-made-the-decision-activity-7316528125016715265-Sta9>.

³⁶ Noam Scheiber, *Microsoft Drops Law Firm That Made a Deal With Trump From a Case*, N.Y. Times (May 4, 2025), <https://www.nytimes.com/2025/05/01/business/microsoft-drops-trump-compliant-law-firm.html>.

Thacher, settled with the administration to avoid being subject to punitive or illegal executive actions.³⁷

Trump's allies and conservative, partisan organizations have already begun demand free legal representation firms that made deals with Trump.³⁸ Like other capitulating law firms Paul Weiss, Skadden, and Kirkland, Simpson Thacher has reportedly provided legal work to the Commerce Department, though neither have confirmed whether the work was paid or pro bono.³⁹ Simpson Thacher has not revealed what clients it has taken on in satisfaction of its promise of \$125 million in legal services, what attorneys have been negatively affected by any revised hiring practices, and what clients it has declined to take on to satisfy the other terms of the deal. Though members of Congress have requested that Simpson Thacher disclose the terms of its deal with Trump and to disavow it, Simpson Thacher has refused to do either. Instead, Gluckow claimed that "[t]he agreements do not dictate or restrict what pro bono matters [the firm] will take on," which appears to directly contradict the publicly known terms of the agreement. Gluckow also failed to respond to any of the detailed questions about the specifics of the agreement with Trump, merely refuting any allegations generally while concluding that the agreement was "entirely lawful and appropriate."⁴⁰

Since the deal, Simpson Thacher has indeed continued to represent prominent clients and issues adverse to the Trump administration's agenda⁴¹ and celebrate immigration, anti-discrimination, LGBTQ+, and election integrity pro bono matters on its website.⁴² But it remains the case that the firm has agreed to provide Trump and his allies with \$125 million in free legal services; the firm has not disavowed this deal nor provided clarity as to how it is fulfilling its obligations; and that the deal was made in order to obtain or evade government action.⁴³ Further investigation is warranted to determine the exact nature of Simpson

³⁷ Erin Mulvaney et al., *The Law Firms That Appeased Trump—and Angered Their Clients*, Wall St. J. (June 1, 2025), <https://www.wsj.com/us-news/law/law-firms-trump-deals-clients-71b3616d> (“At least 11 big companies are moving work away from law firms that settled with the administration or are giving—or intend to give—more business to firms that have been targeted but refused to strike deals, according to general counsels at those companies and other people familiar with those decisions.”).

³⁸ Silver-Greenberg et al., *supra* note 33; Justin Henry, *Heritage-Linked Group Says Big Law Replying to Its Pro Bono Asks*, Bloomberg L. (May 14, 2025), <https://news.bloomberglaw.com/business-and-practice/heritage-linked-group-says-big-law-replying-to-its-pro-bono-asks>.

³⁹ Mike Scarcella, *Law firm Simpson Thacher working with US Commerce Department*, Reuters (Nov. 6, 2025), <https://www.reuters.com/legal/government/law-firm-simpson-thacher-working-with-us-commerce-department-2025-11-06>.

⁴⁰ *Id.*

⁴¹ Monnay, *supra* note 8.

⁴² *About Us: Pro Bono*, *supra* note 9.

⁴³ Mike Scarcella, *Law firm Simpson Thacher working with US Commerce Department*, Reuters (Nov. 6, 2025), <https://www.reuters.com/legal/government/law-firm-simpson-thacher-working-with-us-commerce-department-2025-11-06>.

Thacher's agreement with Trump, whether it has satisfied the terms of that deal, and whether the deal or its satisfaction violates New York's Rules of Professional Conduct.

D. Simpson Thacher's Involvement in the Paramount-Skydance Merger

In October 2024, Trump brought a meritless lawsuit in the Northern District of Texas against Paramount claiming that CBS (a Paramount subsidiary) deceptively edited its interview with Vice President Kamala Harris in the lead up to the 2024 presidential election.⁴⁴ For several months, Paramount seemed prepared to defend its journalists and journalistic integrity. In March 2025, Paramount, in its memorandum to support its motion to dismiss Trump's complaint, wrote:

This lawsuit is an affront to the First Amendment and is without basis in law or fact. Plaintiffs President Donald J. Trump and Representative Ronny Jackson, public officials at the highest ranks of our government, seek to punish a news organization for constitutionally protected editorial judgments they do not like.⁴⁵

Concurrently, Paramount and Skydance awaited approval from the Federal Communications Commission for their merger,⁴⁶ which was withheld for apparent political reasons by FCC Chairman Brendan Carr, Trump's appointee.⁴⁷ The merger was valued at \$8.4 billion.⁴⁸

In June 2025, while the merger remained pending at the FCC, Paramount abruptly entered into mediated settlement discussions in the Texas case, and on July 1, 2025, it agreed to pay \$16 million toward Trump's attorney fees and to fund

⁴⁴ Tobi Raji, *Trump picks one-judge Texas court for lawsuit over CBS Harris interview*, Wash. Post (Oct. 31, 2024), <https://www.washingtonpost.com/politics/2024/10/31/trump-sues-60-minutes-cbs-kamala-harris>.

⁴⁵ Defendant's Memorandum of Law in Support of Their Motion to Dismiss Plaintiffs' Amended Complaint for Lack of Subject-Matter Jurisdiction and Failure to State a Claim at 2, *Trump v. Paramount Glob.*, No. 2:24-CV-00236-Z, (N.D. Tex. Mar. 6, 2025), available at <https://storage.courtlistener.com/recap/gov.uscourts.txnd.396451/gov.uscourts.txnd.396451.52.0.pdf>.

⁴⁶ Skydance Media is owned by David Ellison, son of close Trump ally Larry Ellison, who purportedly is providing most of the \$8 billion bid for Paramount. David Streitfeld & Theodore Schleifer, *How Trump Could Make Larry Ellison the Next Media Mogul*, N.Y. Times (Apr. 2, 2025), <https://www.nytimes.com/2025/04/02/technology/trump-larry-ellison-tiktok-oracle.html>.

⁴⁷ *Skydance Media and Paramount Global*, MB Docket No. 24-275, Fed. Com. Comm'n, <https://www.fcc.gov/transaction/skydance-paramount> (last visited May 27, 2026); see also, John Hendel, *FCC green-lights Skydance/Paramount deal after CBS concessions*, Politico (July 24, 2025), <https://www.politico.com/news/2025/07/24/fcc-greenlights-skydance-paramount-cbs-00476030>.

⁴⁸ Deborah Mary Sophia & David Shepardson, *Paramount closes \$8 billion merger with Skydance after settling '60 Minutes' lawsuit*, Reuters (Aug. 7, 2025), <https://www.reuters.com/legal/transactional/paramount-closes-8-billion-merger-with-skydance-after-settling-60-minutes-2025-08-07>.

his presidential library or purported charitable causes chosen by Trump.⁴⁹ Trump immediately claimed that the deal was worth at least double that. He told a reporter that “we did a deal for about \$16 million plus 16 million, or maybe more than that in advertising,” and then posted on Truth Social that “Paramount/CBS/60 Minutes have today paid \$16 Million Dollars in settlement, and we also anticipate receiving \$20 Million Dollars more from the new Owners, in Advertising, PSAs, or similar Programming, for a total of over \$36 Million Dollars.”⁵⁰ Notably, Paramount Skydance CEO David Ellison never denied making its additional \$20 million side deal with Trump.⁵¹ The deal included an agreement to hire an ombudsman at CBS News to investigate complaints of political bias and get rid of any diversity, equity, and inclusion initiatives at Paramount.⁵² Paramount demonstrated its fealty by abruptly canceling Stephen Colbert’s late-night show after Colbert called the

⁴⁹ Edward Helmore, *Paramount settles with Trump for \$16m over 60 Minutes interview with Kamala Harris*, Guardian (July 2, 2025), <https://www.theguardian.com/media/2025/jul/02/paramount-settles-with-trump-for-16m-over-60-minutes-interview-with-kamala-harris>.

⁵⁰ Donald J. Trump (@realDonaldTrump), Truth Social (July 22, 2025 at 2:10PM), <https://truthsocial.com/@realDonaldTrump/posts/114898229237459086>; Todd Spangler, *Trump Makes Unconfirmed Claim Skydance Will Give Him \$20 Million in ‘Advertising, PSAs or Similar Programming’ After Paramount Merger Goes Through*, VARIETY (July 22, 2025), <https://variety.com/2025/tv/news/trump-unconfirmed-claim-skydance-20-million-advertising-psas-paramount-deal-1236467234>; Todd Spangler, *Trump Claims ‘60 Minutes’ Settlement is Worth As Much as \$35 Million Including ‘Advertising’; Paramount Denies Deal Includes PSAs*, VARIETY (July 4, 2025), <https://variety.com/2025/tv/news/trump-60-minutes-lawsuit-settlement-advertising-35-million-paramount-psa-1236447353>; Clare Malone, *Inside Bari Weiss’s Hostile Takeover of CBS News*, New Yorker (Jan. 19, 2026), <https://www.newyorker.com/magazine/2026/01/26/inside-bari-weiss-hostile-takeover-of-cbs-news>.

⁵¹ Peter Kafka, *Paramount’s new owner David Ellison doesn’t want to talk about Trump*, Bus. Insider (Aug. 7, 2025), <https://www.businessinsider.com/paramount-skydance-david-ellison-new-ceo-cbs-donald-trump-questions-2025-7>; David Folkenflik, *CBS shifts to appease the right under new owner*, NPR (Sep. 12, 2025), <https://www.npr.org/2025/09/12/nx-s1-5537152/cbs-news-ellison-steps-appease-trump>.

⁵² David Bauder, *Paramount gets green light for \$8 billion merger. But what is the psychic cost for company?*, AP News (Jul. 26, 2025), <https://apnews.com/article/paramount-skydance-merger-cbs-news-trump-85560c3c7aaaa1fe894380683e66a89c>; David Folkenflik, *CBS shifts to appease the right under new owner*, NPR (Sep. 12, 2025), <https://www.npr.org/2025/09/12/nx-s1-5537152/cbs-news-ellison-steps-appease-trump>; Todd Spangler, *Skydance Promises FCC It Will Appoint CBS News Ombudsman to Review ‘Complaints of Bias,’ Says Paramount Has Eliminated DEI*, Variety (July 23, 2025), <https://variety.com/2025/tv/news/skydance-promises-fcc-eliminate-dei-paramount-cbs-news-ombudsman-1236467977>.

court settlement a “big, fat bribe”⁵³—a cancellation that Trump declared that he “absolutely love[d].”⁵⁴

The newly merged company is clearly fulfilling its promises to Trump. CBS hired as its ombudsman Kenneth Weinstein, a former head of a conservative think tank and Trump donor with little background in journalism.⁵⁵ CBS has also changed its rules for Face the Nation to air only interviews that are conducted live or prerecorded with no cuts or edits.⁵⁶ In December 2025, Bari Weiss, CBS’s Editor-in-Chief who was hand-picked by David Ellison, controversially pulled a segment on Trump’s deportations to CECOT last minute, raising more concerns that the network was tailoring its coverage to appease the Trump administration.⁵⁷

Though Simpson Thacher did not represent Paramount in the litigation case in the Northern District of Texas, the firm did represent Paramount in the merger deal with Skydance, including counseling Paramount on the process of obtaining regulatory approvals.⁵⁸ Because there has been no investigation into the deals that Paramount made with Trump and his administration, it is not known what, if any, role that Simpson Thacher attorneys might have played in facilitating negotiations with, and monetary promises to, Trump and his associates. An investigation is warranted to determine whether Simpson Thacher’s role in the merger satisfies the New York Rules of Professional Conduct.

⁵³ Sian Cain, *The Late Show With Stephen Colbert to End in 2026 as CBS Cancels Show*, Guardian (July 17, 2025), <https://www.theguardian.com/tv-and-radio/2025/jul/18/the-late-show-with-stephen-colbert-to-end-in-2026-as-cbs-cancels-show>; *The Late Show with Stephen Colbert, Paramount’s Trump Settlement: A Big Fat Bribe | Jeffrey Epstein Never Dies | FIFA Trophy Row* (YouTube, July 14, 2025, at 3:41), <https://www.youtube.com/watch?v=zzvx3L3DQb8>.

⁵⁴ David Bauder, Alician Rancilio & Andrew Dalton, *Stephen Colbert’s ‘Late Show’ is Canceled by CBS and Will End in May 2026*, AP News (July 18, 2025), <https://apnews.com/article/stephen-colbert-late-show-cbs-end-8bad9f16f076df62c0ffc50e9c8adbab>.

⁵⁵ David Bauder, *CBS News’ new ombudsman has background and duties that differ from the job’s traditional definition*, AP News (Sep. 9, 2025), <https://apnews.com/article/paramount-trump-ombudsman-journalism-cbs-news-56e68f08389e30b49360d73c018f8e7c>.

⁵⁶ Michael M. Grynbaum & Benjamin Mullin, *CBS Abruptly Changes Editing Rules After Attacks From Administration*, N.Y. Times (Sep. 5, 2026), <https://www.nytimes.com/2025/09/05/business/cbs-face-the-nation-editing-rules.html>.

⁵⁷ Jason Lalljee, *What to know about CBS’ Bari Weiss amid “60 Minutes” censorship allegations*, Axios (Dec. 22, 2025), <https://www.axios.com/2025/12/23/cecot-bari-weiss-trump-60-minutes>.

⁵⁸ *Matter Highlights: Paramount Combines with Skydance to Create Paramount Skydance Corporation*, Simpson Thacher & Bartlett LLP (Aug. 8, 2025), <https://www.stblaw.com/about-us/news/view/2025/08/08/paramount-combines-with-skydance-to-create-paramount-skydance-corporation>.

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 of the managing partners who entered into negotiations with and ultimately made concessions to Trump (by and through his close advisors or attorneys) in order to obtain rescission of an unlawful and punitive EEOC investigation by the Trump administration and avoid the issuance of a punitive executive order against Simpson Thacher. 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 Simpson Thacher 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 these deals with Trump.⁵⁹

The conduct of Simpson Thacher and other attorneys on its executive committee in reaching and then satisfying the terms of the firm's deal with Trump appear to have violated the New York's Rules of Professional Conduct, specifically Rule 1.7 (conflicts of interest), Rule 8.4(b) (illegal conduct, including bribery and extortion), and Rule 8.4(a) (violating the rules and inducing other attorneys to do so). If Simpson Thacher attorneys were involved in negotiating favors, payments, or improper promises between its clients and Trump and his associates in order to obtain FCC approval of the Paramount-Skydance merger, those attorneys may have violated Rule 1.2(d) (assisting a client with illegal conduct) and Rule 8.4(b) (illegal conduct by attorneys).

A. Rule 1.7(a)(2)—Conflicts of Interest

Per Rule 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 Trump's demands, Simpson Thacher 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 Simpson Thacher has historically been against the federal government or for causes that 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.” Rule 1.7(a)(2).

⁵⁹ 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>.

Rule 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 Simpson Thacher, and Trump appear to be vague and unspecific.⁶⁰ 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.

B. Rule 8.4(a)—Rules Violation and Inducement

Rule 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 1.7(a)(2) and 8.4(b) in making its deal with Trump, Simpson Thacher 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 entire firm, Simpson Thacher's executive committee may have created scenarios where attorneys employed by the firm are induced to violate the Rules of Professional Conduct by participating in the satisfaction of the illegal agreement Simpson Thacher made with Trump.

C. 8.4(b)—Illegal Conduct by Attorneys

Rule 8.4(b) states that a lawyer or law firm shall not “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.⁶¹ Rule 8.4 has been used to discipline an attorney in the absence of a conviction,⁶² though it is often combined with other rules to suspend or disbar an attorney.⁶³

Here, Simpson Thacher likely violated prohibitions against bribery and extortion by entering an illegal agreement with Trump. If the Committee's

⁶⁰ 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>.

⁶¹ 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).

⁶² 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).

⁶³ 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).

investigation reveals that Simpson Thacher has provided any free services to the federal government in fulfillment of their illegal agreement, the firm may have also violated the Antideficiency Act.

Bribery of a public official is prohibited by 18 U.S.C. § 201(b)(1). Trump’s decisions to issue, not issue, or withdraw executive orders and his directives to subordinates to take specific actions, constitute official acts.⁶⁴ The promises made by Simpson Thacher 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, Simpson Thacher’s deal was not a typical “settlement” of legal claims by any measure. The pro bono deal primarily provided personal and political benefit to 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 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). Simpson Thacher promised \$125 million towards Trump’s favored causes “with the expectation of obtaining favorable action,” *Torcasio*, 959 F.2d at 506, specifically rescission of the EEOC investigation and the withholding of a potential executive order against the firm. The promise therefore likely constitutes extortion by Trump and his associates. Though Simpson Thacher 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.”). Simpson Thacher’s agreement with Trump was voluntary. The firm had other, lawful options, as demonstrated by the other prominent firms who chose to fight the blatantly unconstitutional executive orders—which had yet to be even issued against Simpson Thacher—and the law students who had the courage to fight the EEOC investigations and extract a clear

⁶⁴ 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”).

statement that compliance with those investigations was voluntary. And the services given in exchange for political favor were for Trump's political and personal benefit, not 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. In its investigation, the Committee should explore whether Simpson Thacher, through its reported work for the Commerce Department or otherwise, has provided any free services to the federal government. Any such "pro bono" work for the federal government would 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).

D. Rule 1.2(d)—Assisting Client with Illegal Conduct

Paramount's settlement with Trump, and any associated promises, constitutes illegal corruption under both the federal bribery and extortion statutes. As described above, bribery of a public official is prohibited by 18 U.S.C. § 201(b)(1) and extortion is unlawful pursuant to the Hobbs Act. 18 U.S.C. § 1951. Paramount's \$16 million settlement with Trump for a case that was entirely meritless would constitute a "thing of value" exchanged for the "official action" of regulatory approval of the \$8.4 billion Paramount-Skydance merger by the appropriate authorities under Trump's control.

Pursuant to Rule 1.2(d), "A lawyer shall not counsel a client to engage, or assist a client, in conduct that the lawyer knows is illegal or fraudulent..." Further "[w]here a client wants the affirmative assistance of a lawyer in the commission of a future crime, the lawyer must, of course, not knowingly further the client's criminal purpose." *Topic: Intent of Client to Commit A Crime; Withdrawal from Employment; Confidences & Secrets of Clients.*, NY Eth. Op. 562 (July 19, 1984).

If investigation finds that Simpson Thacher attorneys, in the course of its work on the merger, in any way counseled its client to engage in unlawful dealmaking or facilitated such deals in order to secure government approval of the merger, then their conduct would likely be in violation of one or more provisions of the Rules of Professional Conduct, including violate Rule 1.2(d) and Rule 8.4(b) (prohibiting criminal activity by attorneys). Attorneys should have no role in counseling in favor of or negotiating any such illegal payoff to a government official, even if the funds used for such a bribe are funneled through a court settlement. The Committee should investigate the involvement of Simpson Thacher attorneys and take appropriate disciplinary action if misconduct is found.

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 Simpson Thacher has violated the New York Rules of Professional Conduct in making and satisfying its deal with Trump; and second, that it take appropriate action if warranted by the evidence gathered in the investigation, including, but not limited to, ordering Simpson Thacher to cease and desist its satisfaction of the commitments it made to Trump. As part of this investigation, the Committee should explore and appropriately sanction specific attorneys at Simpson Thacher, such as Alden Millard, Paul Gluckow, and other members of the firm's the executive committee who were instrumental in facilitating the deal with Trump.

We also request that the Committee investigate whether Simpson Thacher violated the New York Rules of Professional Conduct in their representation of Paramount in the Paramount-Skydance merger by facilitating a monetary settlement to Trump personally in exchange for official regulatory approval of the merger.

In failing to uphold their ethical obligations, Simpson Thacher and decision-making attorneys at the firm 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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