

IN THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL, : No. 2936 Disciplinary Docket No. 3
: :
Petitioner : :
v. : No. 166 DB 2022
: :
: :
THOMAS PATRICK CONNELLY, JR., : Attorney Registration No. 200586
: :
: :
Respondent : (Philadelphia)

ORDER

PER CURIAM

AND NOW, this 29th day of February, 2024, upon consideration of the Verified Statement of Resignation, Thomas Patrick Connelly, Jr., is disbarred on consent from the Bar of this Commonwealth. See Pa.R.D.E. 215. Respondent shall comply with the provisions of Pa.R.D.E. 217 and pay costs to the Disciplinary Board. See Pa.R.D.E. 208(g).

A True Copy Nicole Traini
As Of 02/29/2024

Attest: 
Chief Clerk
Supreme Court of Pennsylvania

**BEFORE THE DISCIPLINARY BOARD OF
THE SUPREME COURT OF PENNSYLVANIA**

In the Matter of : No. 2936 Disciplinary Docket No. 3
: :
THOMAS PATRICK CONNELLY, JR. : No. 166 DB 2022
: :
: Attorney Registration No. 200586
: :
: (Philadelphia County)

**RESIGNATION
UNDER Pa.R.D.E. 215**

Thomas Patrick Connelly, Jr. hereby tenders his unconditional resignation from the practice of law in the Commonwealth of Pennsylvania in conformity with Rule 215, Pa.R.D.E. ("Enforcement Rules"), and further states as follows:

1. He is a former attorney, having been admitted to the bar in the Commonwealth of Pennsylvania on or about November 7, 2005. His attorney registration number is 200586. He was born on January 16, 1974, and is 50 years old.

2. By Order dated January 6, 2023, the Supreme Court placed him on temporary suspension pursuant to Enforcement Rule 208(f)(5) until further definitive action by the Court. A copy of the Order is attached hereto and made a part hereof as "Exhibit A."

<p>FILED 02/12/2024 The Disciplinary Board of the Supreme Court of Pennsylvania</p>

3. He desires to submit his resignation as a member of said bar.

4. His resignation is freely and voluntarily rendered; he is not being subjected to coercion or duress; and he is fully aware of the implications of submitting this resignation.

5. He is aware that there is presently pending an investigation into allegations that he is guilty of misconduct in violation of Rule of Professional Conduct 8.4(b) based on his arrest on January 6, 2023, for committing criminal acts as set forth more fully in a criminal complaint and affidavit of probable cause, a true and correct copy of which is attached hereto and made a part hereof as "Exhibit B."

6. He is also aware that there is presently pending investigations into allegations that he is guilty of misconduct, the nature of which allegations have been made known to him by service of DB-7 Request for Statement of Respondent's Position letters ("DB-7 Requests") by Office of Disciplinary Counsel ("ODC") at File Nos. C2-22-270 and C2-22-271 dated September 19, 2022; File No. C2-22-756 dated November 15, 2022; and File No. C2-23-1004 dated October 31, 2023. True and correct copies of ODC's DB-7 Requests are attached

hereto, and made a part hereof, and marked as "Exhibit C" collectively.

7. He acknowledges that the material facts upon which the criminal complaint is predicated as set forth in the affidavit of probable cause (Exhibit B), as well as allegations set forth in the DB-7 Requests (Exhibit C) are true, and he admits his conduct violated the Rules of Professional Conduct and are grounds for discipline under Enforcement Rule 203(a).

8. He submits the within resignation because he knows that he could not successfully defend himself against the charges of professional misconduct set forth in the attached exhibits.

9. He is fully aware that submission of this Resignation Statement is irrevocable and that he can only apply for reinstatement to the practice of law pursuant to the provisions of Enforcement Rule 218(b) and (c).

10. He is aware that pursuant to Enforcement Rule 215(c), the fact that he has tendered this resignation shall become a matter of public record immediately upon delivery of the resignation statement to Disciplinary Counsel or the Board Prothonotary.

11. Upon entry of the order disbaring him on consent, he will

promptly comply with the notice, withdrawal, resignation, trust accounting, and cease-and-desist provisions of subdivisions (a), (b), (c) and (d) of Enforcement Rule 217.

12. After entry of the order disbaring him on consent, he will file a verified statement of compliance as required by Enforcement Rule 217(e)(1).

13. He is aware that the waiting period for eligibility to apply for reinstatement to the practice of law under Enforcement Rule 218(b) shall not begin until he files the verified statement of compliance, and if the order of disbarment contains a provision that makes the disbarment retroactive to an earlier date, then the waiting period will be deemed to have begun on that earlier date.

14. He acknowledges that he is fully aware of his right to consult and employ counsel to represent him in the instant proceeding. In connection with the above-referenced disciplinary matters he has not retained counsel to represent him; however, he has retained, consulted with and acted upon the advice of counsel who is representing him in a related criminal matter, Corey Stern Chwiecko, Esquire, regarding his decision to execute the within resignation.

It is understood that the statements made herein are subject to the penalties of 18 Pa.C.S., Section 4904 (relating to unsworn falsification to authorities).

Signed this 9th day of February 2024.



THOMAS PATRICK CONNELLY, JR.
ATTORNEY I.D. NO. 200586

WITNESS:

PRINT NAME:



Corey S. Chulecko, Esquire

EXHIBIT A

IN THE SUPREME COURT OF PENNSYLVANIA

OFFICE OF DISCIPLINARY COUNSEL,	:	No. 2936 Disciplinary Docket No. 3
	:	
Petitioner	:	
	:	No. 166 DB 2022
v.	:	
	:	
	:	Attorney Registration No. 200586
THOMAS PATRICK CONNELLY, JR.,	:	
	:	
Respondent	:	(Berks County)
	:	

ORDER

PER CURIAM

AND NOW, this 6th day of January, 2023, upon consideration of the Recommendation of the Disciplinary Board and the response thereto, Thomas Patrick Connelly, Jr., is placed on temporary suspension until further action by this Court. See Pa.R.D.E. 208(f)(5). He shall comply with all of the provisions of Pa.R.D.E. 217.

Respondent's rights to petition for dissolution or amendment of this Order and to request accelerated disposition of charges underlying this order are specifically preserved. See Pa.R.D.E. 208(f)(4) and (f)(6).

This Order constitutes an imposition of public discipline within the meaning of Pa.R.D.E. 402, pertaining to confidentiality.

A True Copy Nicole Traini
As Of 01/06/2023

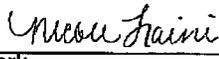
Attest: 
Chief Clerk
Supreme Court of Pennsylvania

EXHIBIT B

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF BERKS



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 23-2-03

MDJ: Hon. SANDRA L. FEGLEY
6112 PERKIOMEN AVE

Address: BIRDSBORO, PA 19508

Telephone: (610) 779-5137

DEFENDANT:

(NAME and ADDRESS):

THOMAS PATRICK CONNELLY JR
First Name Middle Name Last Name Gen
23 PETSCH ROAD
READING PA UNITED STATES 19606

NCIC Extradition Code Type

- 1-Felony Full
- 2-Felony Ltd.
- 3-Felony Surrounding States
- 4-Felony No Ext
- 5-Felony Pend.
- 6-Felony Pend. Extradition Determ.
- A-Misdemeanor Full
- B-Misdemeanor Limited
- C-Misdemeanor Surrounding States
- D-Misdemeanor No Extradition
- E-Misdemeanor Pending
- F-Misdemeanor Pending Extradition Determ.
- Distance:

DEFENDANT IDENTIFICATION INFORMATION

Docket Number: CR 523 Date Filed: 01/06/23 OTNR Live Scan Number: R 412436.3 Complaint/Incident Number: DA-22-2708-3446 Request Lab Services? YES NO

GENDER: Male Female
DOB: 1/16/1974 POB: AKA: First Name Middle Name Last Name Gen: Add'l DOB Co-Defendant(s)

RACE: White Asian Black Native American Unknown
ETHNICITY: Hispanic Non-Hispanic Unknown

HAIR COLOR: GRY (Gray) RED (Red/Auburn) SDY (Sandy) BLU (Blue) PLE (Purple) BRO (Brown)
 BLK (Black) ONG (Orange) WHI (White) XXX (Unk/Bald) GRN (Green) PNK (Pink)
 BLN (Blonde / Strawberry)

EYE COLOR: BLK (Black) BLU (Blue) BRO (Brown) GRN (Green) GRY (Gray)
 HAZ (Hazel) MAR (Maroon) PNK (Pink) MUL (Multicolored) XXX (Unknown)

DNA: YES NO DNA Location: WEIGHT (lbs): 220

FBI Number: MNU Number: Defendant Fingerprinted: YES NO Fingerprint Classification: 6 0

DEFENDANT VEHICLE INFORMATION

Plate # State Hazmat Registration Sticker (MM/YY) Comm'l Veh. Ind. School Veh. Oth. NCIC Veh. Code Reg. same as Def.
VIN Year Make Model Style Color

Office of the attorney for the Commonwealth Approved Disapproved Because:

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth Prior to filing. See Pa.R.Crim.P. 507).

(Name of the attorney for the Commonwealth) (Signature of the attorney for the Commonwealth) (Date)

I, PAMELA MATHIAS (Name of the Affiant) of Berks County DA's Office (Identify Department or Agency Represented and Political Subdivision) do hereby state: (check appropriate box)

1. I accuse the above named defendant who lives at the address set forth above
 I accuse the defendant whose name is unknown to me but who is described as

I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have therefore designated as John Doe or Jane Doe with violating the penal laws of the Commonwealth of Pennsylvania at [220] Lower Alsace Township (Subdivision Code) (Place-Political Subdivision)

23 PETSCH ROAD READING, PA 19606

In BERKS County [06] on or about Between 09/20/2022 and 12/29/2022 (County Code) (Offense Date)



POLICE CRIMINAL COMPLAINT

Docket Number: CR. 5. 23	Date Filed: 01/06/2023	OTNL/Scan Number: K 412 436.3	Complaint/Incident Number: DA-22-2708-3446
Defendant Name:	First: THOMAS	Middle: PATRICK	Last: CONNELLY JR

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.

3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.

4. This complaint consists of the preceding page(s) numbered 1 through 9.

5. I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

PAMELA MATHIAS

1/6/2023

(Date)

Pamela Mathias

(Signature of Affiant)

AND NOW, on this date 1/6/2023 I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

23-2-03

(Magisterial District Court Number)

Randee K. Teyler

(Issuing Authority)





POLICE CRIMINAL COMPLAINT

Docket Number: CR. 5-23	Date Filed: 01/06/2023	OTN/LiveScan Number K412436.3	Complaint/Incident Number DA-22-2708-3446
Defendant Name:	First: THOMAS	Middle: PATRICK	Last: CONNELLY JR

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902-A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input checked="" type="checkbox"/>	1	4702	A2	of the	1B	1	F-3		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code	
<input type="checkbox"/> PennDOT Data (if Applicable)	<input type="checkbox"/> Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (Include the name of the statute or ordinance):
THREATS AND OTHER IMPORPER INFLUENCE IN OFFICIAL AND POLITICAL MATTERS

Acts of the accused associated with this Offense:
PACC 4702(a,2) Threats and other imporper influence in official and political matters.

(a) A person commits an offense if he:

(2) threatens unlawful harm to any public servant with intent to influence his decision, opinion, recommendation, vote or other exercise of discretion in a judicial or administrative proceeding.

To wit: Numerous threatening emails to Mark Gilson, Disciplinary Counsel, Disciplinary Board of the Supreme Court of PA.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	2	4953	A	of the	1B	1	M-2		
Lead?	Offense #	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code	
<input type="checkbox"/> PennDOT Data (if Applicable)	<input type="checkbox"/> Accident Number				<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (Include the name of the statute or ordinance):
RETALIATION AGAINST WITNESS, VICTIM OR PARTY

Acts of the accused associated with this Offense:
PACC 4953(a) Retaliation Against Witness, Victim, or Party

(a) A person commits an offense if he harms another by unlawful act or engages in a course of conduct or repeatedly commits acts which threaten another in retaliation for anything lawfully done in the capacity of witness, victim, or a party in a civil matter.

To wit: Numerous threatening emails to Mark Gilson, Disciplinary Counsel, Disciplinary Board of the Supreme Court of PA.



POLICE CRIMINAL COMPLAINT

Docket Number: CR. 5-23	Date Filed: 01/06/2023	OTN/LiveScan Number R 412436.3	Complaint/Incident Number DA-22-2708-3446
Defendant Name	First: THOMAS	Middle: PATRICK	Last: CONNELLY JR

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	3	2709	A7	of the	18	1	M-3		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (Include the name of the statute or ordinance):

HARASSMENT - COMM. REPEATEDLY IN ANOTHER

Acts of the accused associated with this Offense:

PACC 2709(a,7) Harassment

IN THAT, on or about said date, the defendant, with intent to harass, annoy or alarm another person, namely, Mark Gilson, did communicate repeatedly in a manner other than specified in paragraphs (4) (5) (6), namely, sent numerous threatening emails to Mark Gilson, Disciplinary Counsel, Disciplinary Board of the Supreme Court of PA., which did annoy or alarm such other person.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	4	2709	A3	of the	18	1	S		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (Include the name of the statute or ordinance):

HARASSMENT - COURSE OF CONDUCT W/NO LEGITIMATE PURPOSE

Acts of the accused associated with this Offense:

PACC 2709(a,3) Harassment

IN THAT, on or about said date, the defendant, with intent to harass, annoy or alarm another person, namely, Mark Gilson, did engage in a course of conduct or repeatedly committed acts, namely, sent numerous threatening emails to Mark Gilson, Disciplinary Counsel, Disciplinary Board of the Supreme Court of PA., which did alarm or seriously annoy such other person and which served no legitimate purpose.



POLICE CRIMINAL COMPLAINT

Docket Number: CR.5.23	Date Filed: 01/06/2023	OTN/LiveScan Number: R 4124363	Complaint/Incident Number: DA-22-2708-3446
Defendant Name:	First: THOMAS	Middle: PATRICK	Last: CONNELLY JR

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated.

<input type="checkbox"/> Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
---	--	---	---	---

<input type="checkbox"/>	5	2706	A1	of the	18	1	M-1		
Lead?	Offense #	Section	Subsection		PA Statute (Title)	Counts	Grade	NCIC Code	UCR/NIBRS Code

PennDOT Data (if Applicable)	Accident Number	<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone
------------------------------	-----------------	-------------------------------------	--------------------------------------	------------------------------------

Statute Description (Include the name of the statute or ordinance):

TERRORISTIC THREATS W/ INT TO TERRORIZE ANOTHER

Acts of the accused associated with this Offense:

PACC 2706(a,1) Terroristic Threats W/ Int To Terrorize Another

(a) A person commits the crime of terroristic threats if the person communicates, either directly or indirectly, a threat to:

(1) commit any crime of violence with intent to terrorize another.

To wit: Numerous threatening emails to Mark Gilson, Disciplinary Counsel, Disciplinary Board of the Supreme Court of PA.



POLICE CRIMINAL COMPLAINT

Docket Number: CR. 5-23	Date Filed: 01/06/2023	OTN/Live Scan Number R 412436.3	Complaint/Incident Number DA-22-2708-3446
Defendant Name	First: THOMAS	Middle: PATRICK	Last: CONNELLY JR

AFFIDAVIT OF PROBABLE CAUSE

That the affiant is a sworn County Detective employed by Berks County District Attorney's Office, which has lawful jurisdiction within Berks County, Commonwealth of Pennsylvania.

That on, November 16, 2022, Berks County District Attorney's Office received a letter/complaint from The Disciplinary Board of the Supreme Court of Pennsylvania, Office of Disciplinary Counsel (ODC). The Office of Disciplinary Counsel was conducting a confidential inquiry into two related disciplinary complaints filed at their office against Thomas Connelly, Esquire who resides at 23 Petsch Road, Reading, Pa 19606, Berks County, Commonwealth of Pennsylvania. The investigation was assigned to Mark Gilson, Disciplinary Counsel (DC).

Chronology of significant events:

That on, September 19, 2022, Gilson mailed/emailed a DB-7 Request for Statement of Respondent's Position letter to Connelly at three different email addresses;
 tpc@attorney.com
 tom@attorneytpc.com
 attorneytpc@gmail.com

That on, September 19, 2022, Connelly responded to Gilson by email address thomasconnelly314@gmail.com. A total of six (6) emails were received demanding Gilson call him and calling Gilson a "piece of garbage".

Email Time Stamps:

- @3:36pm
- @4:23pm
- @4:35pm
- @4:39pm
- @4:53pm
- @5:08pm

That on, September 20, 2022, Gilson emailed Connelly advising that due to the previous emails, the ODC will not agree to communicate by telephone and that any and all discussions, interactions and communications will need to be in writing. Connelly responded from email address thomasconnelly314@gmail.com, "Oh Okay Coward".

Email Time Stamp:

- @10:27am

That on, October 17, 2022, Gilson received an email from Lori Montecalvo, Paralegal to Thomas Connelly, Esquire (lori@attorneytpc.com) requesting an extension of sixty (60) days to respond to the DB-7. In the letter, Connelly advised he has been diagnosed with PTSD (Post-traumatic stress disorder).

Email Time Stamp:

- @10:40pm

That on, October 18, 2022, Gilson responded to Connelly and Montecalvo that an extension would be granted; however, it would be a one-time, thirty (30) day extension.

That on, November 15, 2022, Connelly emailed Gilson a letter at 1:41 AM regarding the DB-7 response.



POLICE CRIMINAL COMPLAINT

AFFIDAVIT CONTINUATION PAGE

Docket Number: CR. 5-23	Date Filed: 01/06/2023	OTN/LiveScan Number R 412436.3	Complaint/Incident Number DA-22-2708-3446
Defendant Name	First: THOMAS	Middle: PATRICK	Last: CONNELLY JR

AFFIDAVIT OF PROBABLE CAUSE CONTINUATION

The email was followed by a series of twenty-six (26) separate emails between the hours of 4:58 AM and 6:21 AM. Alarming, harassing, and threatening content was contained in the emails. Below is some of the content:

- "Go fuck yourself" @(6:21am)
- "I'm gonna have fun with you you fucking pussy" @(6:17am)
- "I'm just gonna have fun with it because I really don't want to be an attorney anymore" @(6:16am)
- "now you are done" @(6:13am)
- "You're done" @(6:13am)
- "I seriously want a shot at your face. I want to pound it into meat" @(6:07am)
- "I don't give a fuck. Did you catch that?" @(5:17am)
- "I'm gonna destroy everything you love" @(5:11am)
- "fucking coward cuck piece of shit" @(5:08am)
- "I already own you" @(5:07am)
- "I'm looking forward to destroying you, you piece of garbage pussy piece of shit" @(5:03am)
- "Thank you so much for giving me a vessel within which to deposit all my hate" @(5:00am)
- "I'm going to destroy you" @(5:00am)
- "Go fuck yourself you piece of shit" @(4:58am)

That on, November 15, 2022, Gilson reported the alarming, threatening, harassing emails to his boss.

That on, November 17, 2022, the investigation was assigned to Detective Pamela Mathias.

That on, November 21, 2022, Gilson received documents and materials from Connelly in response to the disciplinary complaints. One of the documents provided was a Motion for Stay. The motion has no relevancy to Connelly's disciplinary matters, yet Connelly sent it to Gilson. In the Motion for Stay, Connelly refers to a "rage" he feels that causes him to be "triggered 10-20 times a day" and that he "experiences on an almost daily basis a homicidal rage". Connelly also refers to himself as a "capable opponent who rather enjoys combat" and who is "prepared to give his life" to the cause he is pursuing.

That on, November 22, 2022, an interview with Gilson was completed. During the interview, Gilson advised that he has never met Connelly in person; however, takes the threats and harassment seriously and is concerned for his safety and safety of his family.

That on, November 23, 2022, Gilson received an email with Subject: "karma" from Connelly (thomasconnelly314@gmail.com). Below is some of the content:

- "What's your next move?"
- "you and your criminal superiors need to fuck off"
- "this grace period ends"
- Email Time Stamp:
@5:56pm

That on, December 1, 2022, an Application for Search Warrant and Authorization for Google, LLC. was taken before Judge Geishouser. Search Warrant was executed through the law enforcement site.

That on, December 28, 2022, Connelly sent Gilson the following email:

"Since we are each being honest with each other. Did you see what I did there? That email was the last



POLICE CRIMINAL COMPLAINT

AFFIDAVIT CONTINUATION PAGE

Docket Number: CR.5.23	Date Filed: 01/06/2023	OTN/LiveScan Number: R 412 436.3	Complaint/Incident Number: DA-22-2708-3446
Defendant Name:	First: THOMAS	Middle: PATRICK	Last: CONNELLY JR

AFFIDAVIT OF PROBABLE CAUSE CONTINUATION

piece. I'm giving you the metadata because you are at the fulcrum of this thing. That was all bullshit. Now they are really fucked. I'll destroy every last one of those motherfuckers. I gave them nothing. But you can trust me. Or can you? I want my fucking kids back. Remember the qui tam. This Commonwealth is on the verge of destruction. I'll burn the motherfucker down. You better get word to somebody to fix this NOW."

Email Time Stamp:
@11:48pm

That on, December 29, 2022, Connelly sent Gilson an email. Below is some content:

- "you grossly misjudged me" @(12:27am)
- "you motherfuckers are lucky you're still vertical" @(12:27am)
- "you better fix this. I'm not not fucking around anymore" @(4:00am)
- "do you know what homicidal rage is" @(4:08am)
- "how are your kids" @(4:10am)
- "you fucking piece of shit" @(4:11am)
- "homicidal fucking rage" @(4:11am)

That on, January 3, 2023, Detective Mathias called Connelly to request a meeting to speak with him in reference to emails. Connelly did not answer and a message was left in his voice mail.

That on, January 4, 2023, Detective Mathias recieved a forwarded email from Connelly. Below is some content:

- "one of your detectives contacted me about 'emails" @(3:50pm)
- "I also do not intend to send anymore emails or make any Facebook posts" @(3:50pm)
- "I apologize to whomever felt it necessary to contact your office" @(3:50pm)
- "neighbor's 911 call on my behalf.....for impatient treatment due to homicidal ideation" @(4:30pm)

That on, January 5, 2023, Detective Mathias and Detective Perkins went 23 Petsch Road, Reading to speak with Connelly about the threatening emails to Gilson: Upon contact with Connelly, he would not come outside but spoke through the glass door. I asked if he was willing to come outside and speak with us and he said "no". I asked if he knew the purpose of our visit. Connelly stated yes and that it was because of the emails he sent to the DA. I said "no, it is not the emails you sent to the DA, it is about other emails you sent". Connelly stated that he would only communicate by email and provided his email address of thomasconnelly314@gmail.com.

Your affiant has verified the email address of thomasconnelly314@gmail.com being used by Connelly through the 2022-2023 PA Attorney Annual Registration Form that Connelly completed in September of 2022. On the form, Connelly provides a secondary email address of thomasconnelly314@gmail.com. Connelly also verbally provided his email address to Detective Mathias on 1/5/2023 and requested communication using that email.

Your affiant, based on previous paragraphs; show there is probable cause to believe that Thomas Connelly Jr. is committing offenses involving Retaliation Against Witness, Victim or Party, Threats and Other Improper Influence in Official and Political Matters, Terroristic Threats, and Harassment in violation of Title 18, 4953(a), 4702(a,2), 2706(a,1) and 2709(a,3)(a,7) of the Pennsylvania Crimes Code from email address thomasconnelly314@gmail.com from his residence at 23 Petsch Road, Reading, Pa 19606. Your affiant is requesting an arrest warrant for Thomas Connelly Jr. to answer to the charges brought before



POLICE CRIMINAL COMPLAINT

AFFIDAVIT CONTINUATION PAGE

Docket Number: CR. 5.23	Date Filed: 01/06/2023	OTN LiveScan Number: K 412 436.3	Complaint/Incident Number: DA-22-2708-3446
Defendant Name:	First: THOMAS	Middle: PATRICK	Last: CONNELLY JR

AFFIDAVIT OF PROBABLE CAUSE CONTINUATION

the Court:

I, PAMELA MATHIAS, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

Pamela Mathias

(Signature of Affiant)

Sworn to me and subscribed before me this 6 day of January

1/6/23 Date Pamela Mathias

My commission expires first Monday of January, 1/2028



EXHIBIT C

Thomas J. Farrell
Chief Disciplinary Counsel

Raymond S. Wierciszewski
Deputy Chief Disciplinary Counsel

Anthony P. Sodroski
Disciplinary Counsel-In-Charge,
Special Projects

District I Office
1601 Market Street
Suite 3320
Philadelphia, PA 19103-2337

(215) 560-6296
FAX (215) 560-4528

THE DISCIPLINARY BOARD
OF THE
SUPREME COURT OF PENNSYLVANIA



OFFICE OF DISCIPLINARY COUNSEL
www.padisiplinaryboard.org

Disciplinary Counsel-In-Charge
Ramona M. Marian

Disciplinary Counsel
Richard Hernandez
Gloria Randall Ammons
Harriet R. Brumberg
Michael D. Gottsch
Jeffrey M. Krulik
Mark F. Gilson

September 19, 2022

PERSONAL AND CONFIDENTIAL

Thomas Patrick Connelly, Jr., Esquire
23 Petsch Road
Reading, PA 19606

Re: Complaint of Jennifer A. Brooks, File No C2-22-270 &
Complaint of Jeffrey R. Boyd, Esquire, File No C2-22-
271

DB-7 REQUEST FOR STATEMENT OF RESPONDENT'S POSITION

Dear Mr. Connelly:

Please be advised that this office is currently considering two complaints against you from Ms. Jennifer A. Brooks, 149 Bingaman Road, Reading PA 19606, and Jeffrey R. Boyd, Esquire, 7 East Philadelphia Avenue, Boyertown, PA 1952. It is important for you to understand that issuance of this letter means that the complaints against you have survived this office's initial screening process and that, based upon the information currently available to us, it appears that your conduct may have violated the Rules of Professional Conduct.

It is also important for you to understand that it is the obligation of this office to develop all information relevant to a complaint, including the information which may justify or exonerate the alleged actions of the respondent-attorney or mitigate the seriousness of any violations that may have occurred. Since these complaints have survived our initial screening process you should retain or consult with counsel before submitting a statement of your position.

Thomas Patrick Connelly, Esquire
September 19, 2022
Page 2

The alleged facts presently under consideration are as follows:

1. You are a lawyer admitted to the practice of law in Pennsylvania on November 7, 2005.

2. In, around and/or before March 2022, you and Mr. and Mrs. Edward and Jennifer Brooks:

- a. were neighbors residing in Reading, PA;
- b. shared access, use and enjoyment of a private roadway known as Petsch Road; and
- c. were involved in a dispute involving access, use, enjoyment, and costs associated with the repair and maintenance of Petsch Road.

3. On or about March 18, 2022, you filed a *Writ of Summons in a Civil Action* on behalf of yourself and other named plaintiffs against defendants, Mr. and Mrs. Brooks, in the Berks County Court of Common Pleas in a case captioned: *Emma Dean, et al. v. Edward E. Brooks, et al.*, docket no. 22-02612 (hereinafter "the tortious interference case") regarding, *inter alia*, a dispute concerning defendants' alleged interference with plaintiffs' access, use and enjoyment of Petsch Road.

4. You self-identified as "Attorney for Plaintiffs" in the tortious interference case.

5. You claimed to represent yourself and all named plaintiffs in the tortious interference case.

6. On information and belief, you failed to:

- a. inform, advise, alert and/or otherwise notify Mr. and Mrs. Nathan and Rebecca John that you named, identified and included them as plaintiffs in the tortious interference case;
- b. obtain the consent, agreement, approval, permission, and/or authorization of Mr. and Mrs. John to:

- i. file a writ of summons on their behalf naming, identifying and including them as plaintiffs in the tortious interference case; and
- ii. represent Mr. and Mrs. John and/or act as their lawyer in the tortious interference case.

7. Mr. and Mrs. John did not:

- a. retain you to represent them in the tortious interference case; or
- b. provide you their consent, agreement, approval, permission and/or authorization to name, identify and include them as plaintiffs in the tortious interference case.

8. Mr. and Mrs. Brooks retained Jeffrey R. Boyd, Esquire, to represent them in the tortious interference case.

9. On the same day that you filed the writ of summons referenced above, March 18, 2022, you wrote and sent a series of nine text messages to Ms. Brooks on her cellphone stating the following:

- a. "Sheriff will be serving you this week. If you want an advance copy of the writ of summons and cover letter please email me at tom@attorneytpc.com. You guys fucked with the wrong dude";
- b. "we want you gone";
- c. "found the easement btw";
- d. "I hate bullies";
- e. "Does he beat you?"
- f. "I can help if you need it";
- g. "not so tough now, is he"?
- h. "Thought so. Pussies"; and
- i. "You're as good as gone"

10. Ms. Brooks received your text messages.
11. Ms. Brooks did not solicit and/or otherwise request that you send the above-referenced text messages to her.
12. Your text messages to Ms. Brooks referenced above:
 - a. served no legitimate or lawful purpose; and
 - b. were sent by you with the intent to embarrass, annoy, alarm, intimidate, harass, upset, anger and/or vex Ms. Brooks.
13. After receiving the above-referenced text messages from you, Ms. Brooks called the Pennsylvania State Police (hereinafter "PSP") and reported the incident to law enforcement authorities.
14. PSP Trooper James Green responded to Ms. Brooks' call, and during the course of his investigation into the incident, Trooper Green came into contact with you, whereupon you, *inter alia*:
 - a. yelled verbal obscenities and threats at Trooper Green;
 - b. assaulted, attempted to assault, and/or physically menaced Trooper Green;
 - c. resisted arrest; and
 - d. were taken into custody and arrested by members of PSP.
15. Following your arrest, the Berks County District Attorney's Office filed two separate criminal complaints against you under cases captioned: *Commonwealth v. Thomas Patrick Connelly* (hereinafter collectively referred to as "the criminal cases"), charging you in each case as follows:
 - a. case no. CP-06-CR-0001551-2022, with two counts of harassment; and
 - b. case no. CP-06-CR-0001008-2022, with simple assault, resisting arrest, harassment, and disorderly conduct.

16. You represented yourself in the criminal cases.

17. On or about March 21, 2022, Mr. and Mrs. Brooks commenced a civil action in equity against you and other named defendants by filing a *Petition to Repair Private Road* in the Berks County Court of Common Pleas in a case captioned: *Edward E. Brooks, et al. v. Scott Petsch, et al.*, docket no. 22-02619, relating to the maintenance and repair of Petsch Road (hereinafter "the private road matter").

18. Attorney Boyd represented Mr. and Mrs. Boyd, in the private road matter.

19. You:

- a. received a copy of the above-referenced *Petition to Repair Private Road* regarding the private road matter; and
- b. represented yourself in the private road matter.

20. On or about March 22, 2022, Attorney Boyd filed a *Praecipe for Rule to File a Complaint* in the tortious interference case.

21. You received a copy of the above-referenced pleading.

22. On April 11, 2022, you filed a *Complaint* in the tortious interference case in which you failed to, *inter alia*:

- a. set forth a jurisdictional amount;
- b. endorse and attach a *Notice to Defend*;
- c. attach a signed verification from any of the plaintiffs named and/or identified in the *Complaint*;
- d. inform, advise, alert and/or otherwise notify Mr. and Mrs. John that you named, identified and included them as plaintiffs in the *Complaint*; or
- e. obtain the consent, agreement, approval, permission, and/or authorization of Mr. and Mrs. John to file a *Complaint* on their behalf naming,

Thomas Patrick Connelly, Esquire
September 19, 2022
Page 6

identifying and including them as plaintiffs in the tortious interference case.

23. On or about April 21, 2022:

- a. Ms. Eva Pinter retained you to represent her in the tortious interference case; and
- b. you provided Ms. Pinter a written *Flat Fee/Contingency Fee Agreement To Provide Legal Services, And Power of Attorney* (hereinafter "the fee agreement").

24. On information and belief, in, on and around April 21, 2022, you did not have and/or maintain professional liability insurance of at least \$100,000 per occurrence and \$300,000 in aggregate per year.

25. You failed to inform Ms. Pinter in writing that you did not have and/or maintain professional liability insurance as required pursuant to Rule of Professional Conduct 1.4(a).

26. Neither Mr. and Mrs. John, nor Mr. and Mrs. Scott and Kelly Petsch:

- a. signed the fee agreement; or
- b. retained you to represent them in the tortious interference case.

27. On or about April 25, 2022, you filed a *Motion to Withdraw as Counsel* for plaintiffs Mr. and Mrs. John, and Mr. and Mrs. Scott and Kelly Petsch, in the tortious interference case in which you admitted, *inter alia*, that you had failed to obtain a written fee agreement retaining you as counsel from any of these named plaintiffs.

28. You failed to obtain a written fee agreement from Mr. and Mr. John and Mr. and Mrs. Petsch prior to filing both the *Writ of Summons* and *Complaint* in the tortious interference case naming them as plaintiffs.

29. On or about March 28, 2022, you commenced a federal civil action in the United States District Court for the Eastern District of Pennsylvania captioned *Thomas P. Connelly, Jr., et al. v. Jennifer A. Brooks, et al.*, case no. 5:22-cv-01163 (hereinafter

Thomas Patrick Connelly, Esquire
September 19, 2022
Page 7

"the federal case"), and in the complaint you averred, *inter alia*, that:

- a. "...Trooper Green and his goons [referring to unnamed PSP Troopers] conspired to concoct a story justifying Plaintiff Connelly's false arrest and imprisonment";
- b. "Trooper Green had no probable cause to search Plaintiff Connelly's property or to arrest him, so he simply created a situation that he *thought* would allow him to do so"; (original emphasis)
- c. Trooper Green "filed a false affidavit of probable cause against [you] in order to protect himself. It is predominantly lies";
- d. Trooper Green conspired with PSP Corporal Matthew Truscott to "file a false affidavit of probable cause against [you], again predominantly lies";
- e. "...the assault [on you] was planned and coordinated by the Brooks, Green and Boyd";
- f. "Defendant Pennsylvania State Police...conspired with Green to assault, batter and falsely arrest and imprison Plaintiff Connelly";
- g. "Defendants, the Brooks, like Green, are bullies and cowards";
- h. "Defendant Jennifer Brooks uses her position as a Berks County employee to facilitate the Brooks' 'harassment by cop' bullying program...";
- i. "This is not the first time that the Pennsylvania State Police have conspired with civilian bullies to falsely arrest and prosecute Plaintiff Connelly";
- j. Berks County District Attorney John T. Adams and Assistant District Attorney Colin Boyer "conspired with the Brooks, the PSP and others [to commit acts of] official oppression [and] Honest Services Fraud" against you;

- k. "Defendant Adams spends most of his time covering up his extra-marital affairs"; and
- l. "Defendant Boyd on behalf of the Brooks, in apparent retaliation for service of the writ of summons...filed a frivolous (ridiculous really) petition against [you]."

30. The above-referenced averments, as well as other averments of a similar nature set forth in the complaint:

- a. had no basis in law or fact;
- b. were unsupported by the evidence of record in the federal case; and
- c. were frivolous, false, and/or made with reckless disregard for their truth or falsity.

31. You:

- a. had no factual basis or evidence to support the averments in the complaint that are referenced above; and
- b. made such averments knowing them to be false.

32. In the above-referenced complaint for the federal case, beginning on page 19 of the complaint at ¶ 83, and continuing to page 108 at ¶ 562 (a total of 479 separately numbered paragraphs), you referred to and described events and circumstances regarding an unrelated and irrelevant child custody matter to which you were a party.

33. You:

- a. filed a meritless and frivolous federal civil rights action; and
- b. abused legal procedure and/or the legal process.

34. By email dated March 29, 2022, sent from your email address, thomasconnelly314@gmail.com, to Mr. Boyd's law firm's email address, info@boydandkarver.com, you:

- a. provided a copy of the complaint in the federal case to Mr. Boyd; and
- b. extended an offer to "release the Brooks from all liability if they convey their property to me free and clear for an amount that will be determined by me and placed in trust for the parties' child....[and] Jennifer and her child must be evaluated to determine if they have been abused, and Ed needs anger management subject to my approval (of the program, not his 'score')."

35. Mr. Boyd received your email.

36. On information and belief, on the morning of March 30, 2022, you made multiple telephone calls to Mr. Boyd's law firm, spoke to the firm's legal assistant, Ms. Beverly Kline, and threatened, *inter alia*, "to take this whole firm from [Mr. Boyd]."

37. By email sent to you dated March 30, 2022, 4:08 p.m., Mr. Boyd responded to the above-referenced telephone calls, and wrote:

Mr. Connelly:

It is my understanding that you continue to call and harass my staff. Please be advised that you are not to do the following:

1. Call my office.
2. Call my home or the home of any of my staff.
3. Come to my office.
4. Come to my home or the home of any of my staff.

I appreciate the fact that you want to represent yourself in this matter, but you must be respectful of opposing counsel. I am scheduled to meet with my clients Friday morning. It is my expectation they will decline your offer. Should you fail to heed this warning, I will be asking for charges to be brought against you. Any future communication must be in writing and be respectful, without threats. I anticipate your cooperation in this regard. Thank you very much. Jeff
Jeffrey B. Boyd, Esquire

38. You received this email, and responded with a series of 25 separate emails that you sent to Mr. Boyd on the same day beginning at 4:17 p.m. and continuing until 11:17 p.m., in which you wrote, *inter alia*:

- a. "Oh wait, you are under the impression that you have any leverage at all. No problem. Please tell your clients the offer is withdrawn";
- b. "Please tell your partner that I'll settle with him if he fires you and makes me his partner";
- c. "And tell your clients they can fire you and call me directly anytime. 484-987-0499";
- d. "You should probably speak with them [referring to Mr. and Mrs. Brooks] individually because I suspect that there is some spousal abuse going on";
- e. "Go fuck yourself. You're done";
- f. "So is your firm";
- g. "Do you realize you committed a federal crime? You are in a world of hurt bucko";
- h. "You'll be lucky to avoid prison";
- i. "You had your chance. Time for you to go";
- j. "Tic toc asshole";
- k. "Cannot wait to take everything they own [referring to Mr. and Mrs. Brooks] and your firm. I won't fire the secretary lady. She doesn't understand what an absolute asshole you are";
- l. "If you want I can report myself to the disciplinary board. Not sure they will do anything since they are defendants in the suit your sorry ass is about to join"; and
- m. "You stupid motherfucker. Posting at midnight unless your douchebag partner calls me."

39. Mr. Boyd received the above-referenced emails.

40. The emails you sent to Mr. Boyd referenced above:
- a. served no legitimate or lawful purpose; and
 - b. were sent by you with the intent to embarrass, annoy, alarm, intimidate, harass, upset, anger and/or vex Mr. Boyd.
41. You also posted on your public Facebook account:
- a. a copy of the complaint in the federal case;
 - b. the emails you sent to Mr. Boyd referenced in ¶ 38 above; and
 - c. multiple derogatory statements regarding some of the individuals involved in the above-referenced matters.

42. By way of example, you posted the following statements on your Facebook page regarding some of the individuals involved in the above-referenced matters:

- a. "Hey everyone. Want a good attorney? Call Boyd & Karver. They have my highest recommendation. Don't want to be disparaging anyone on FB";
- b. "Did you still want me to report myself to the disciplinary board? I'm really sorry that I used difficult language with you and your staff. You must be really hurting right now. Let me just say that I am really sorry and that it won't happen again. Whether or not you are butt-hurt is really an issue for me, so please let me know anytime you are butt-hurt and I will stop butt-hurting you and I will get some Vaseline. Is that okay?";
- c. "Before I make a move, I want to know (1) what is most dear to them. Full stop. Because that is where the strike will be aimed. And it will come when least expected."
- d. "You're a fucking coward, and I'm calling you out [referring to Trooper Green]";

- e. "That goes for you too, Ed [referring to Mr. Brooks]. You want to keep your house? Let's set something up";
- f. "Nobody fucks with the people I love. Nobody";
- g. "Fucking disgrace [referring to Trooper Green]";
- h. "I sued him in federal court [referring to Trooper Green]. My offer still stands. I'll release him from liability if he wants to get in the cage with me. No ballistic gear. No guns. Just me and him. Give me 20 minutes Trooper Green and all is forgiven. Let me know"; and
- i. Seems like Trooper Green should spend less time harassing people and more time at the gym [referring to a photograph of Trooper Green posted along with the statement]."

43. The information you posted on your Facebook account referenced above:

- a. served no legitimate or lawful purpose; and
- b. were posted by you with the intent to embarrass, annoy, alarm, intimidate, harass, upset, anger and/or vex the individuals to whom you referred.

44. On March 30, 2022, a preliminary hearing was scheduled before Magistrate District Judge Sandra L. Fegley for criminal case no. CP-06-CR-0001008-2022, at which you:

- a. were subpoenaed to appear and attend;
- b. initially appeared in Magistrate Fegley's court on the morning of the preliminary hearing;
- c. left court before the case was called for the preliminary hearing without the permission and/or approval of Magistrate Fegley; and
- d. were not present when the case was called for a preliminary hearing by Magistrate Fegley.

45. Magistrate Fegley:

- a. conducted the preliminary hearing in *absentia*;
- b. ordered you held for court on all charges; and
- c. issued a bench warrant for your arrest due to your willful failure to attend the preliminary hearing.

46. Despite having been issued a subpoena ordering you to appear, you intentionally, deliberately and/or willfully failed to attend the preliminary hearing.

47. On or about April 8, 2022:

- a. you surrendered yourself at the Berks County Courthouse; and
- b. Judge James M. Lillis stayed the bench warrant and set new bail for you in the amount of \$100,000.00.

48. On May 18, 2022, a preliminary hearing was scheduled for criminal case no. CP-06-CR-0001551-2022, before Magistrate District Judge Steven Michael Chieffo, at which:

- a. you appeared and represented yourself;
- b. Ms. Brooks testified as a witness for the Commonwealth;
- c. at your request, you were granted permission by Magistrate Chieffo to audio record the testimony of Ms. Brooks on your cellphone; and
- d. following the conclusion of the hearing you were ordered held for court on all charges.

49. After the above-referenced preliminary hearing, you posted the audio recording of Ms. Brooks' testimony on your public Facebook account along with Ms. Brooks' full name and home address.

50. Posting the audio recording of Ms. Brooks' testimony and her contact information on your Facebook account:

- a. served no legitimate or lawful purpose; and

- b. was done with the intent to embarrass, annoy, alarm, intimidate, harass, upset, anger and/or vex Ms. Brooks.

51. By email to Mr. Boyd dated June 22, 2022, you wrote, *inter alia*:

You may want to start thinking of an exit strategy for your clients....You've started a war with them that they can't win....when I am fucked-with, or my children and others that I love are fucked-with, my goal is to put my adversary in a position where he/she cannot harm me or the people that I love further. That usually means I have to annihilate my opponents. My goal right now is to take the Brooks' property at 149 Bingham Road....My goal with respect to your firm is to become a partner and to have you fired (I need an office). That's how I operate. My practice is to strike at the heart of my opponents. What is most dear to them? That's the question I ask myself....That's why I humiliated you, and the DA and the ADA and Trooper Green, etc. I know you tried to file a disciplinary complaint against me. That was hilarious....Your clients will not survive this storm (financially or emotionally)....I will never stop fighting....I really don't want to hurt you, your partner, your firm, or your clients. Ball is in your court.
Tom Connelly

52. Mr. Boyd received your email.

53. Your email to Mr. Boyd referenced above:

- a. served no legitimate or lawful purpose; and
- b. was sent by you with the intent to embarrass, annoy, alarm, intimidate, harass, upset, anger and/or vex Mr. Boyd and Mr. And Mrs. Brooks.

54. On August 18, 2022, you filed *Notice of Voluntary Dismissal by All Plaintiffs as to All Defendants* in the federal case.

55. By Order dated August 23, 2022, Judge John M. Gallagher dismissed the federal case.

Thomas Patrick Connelly, Esquire
September 19, 2022
Page 15

56. On September 1, 2022, you appeared before Judge Theresa M. Johnson for a hearing regarding the criminal cases referenced above in ¶ 15, at which you:

- a. entered a plea of *nolo contendere* to two counts of harassment and one count of disorderly conduct; and
- b. were adjudged guilty of the charges by Judge Johnson.

If the above allegations are true, we are concerned that you may have violated the following Rules of Professional Conduct: RPC 1.4(c); RPC 1.5(b); RPC 3.1; RPC 3.3(a) (1); RPC 3.5(d); RPC 3.6(a); RPC 4.1(a); RPC 4.4(a); RPC 8.2(a); RPC 8.4 (b); RPC 8.4(c); and RPC 8.4(d).

The Office of Disciplinary Counsel will make no recommendation for the disposition of this complaint until you have been afforded an opportunity to state your position with respect thereto within thirty (30) days of the date of this letter. Please note that failure to respond to this request for your statement of position without good cause is an independent ground for discipline pursuant to Rule 203(b) (7) of the Pennsylvania Rules of Disciplinary Enforcement. The Office of Disciplinary Counsel will only agree to a limited extension of the thirty-day deadline when the request is made for specific reasons constituting good cause. If you do not respond or provide good cause for failing to respond within 30 days, the Office of Disciplinary Counsel may seek to impose discipline for your violation of Pa.R.D.E. 203(b) (7).

Please be assured that we are not prejudging the alleged facts and charges. Rather, we are conducting an impartial and unbiased investigation with regard to this complaint. In that regard, we will attempt to verify the statements in your answer just as we do with the statements made to us by the complainants. For this reason, and because a lawyer can be subject to discipline for making a materially false statement or deliberately failing to disclose a material fact in connection with a disciplinary matter, you should be careful to be accurate in your factual statements. Additionally, as previously stated, you may wish to consult with counsel before replying to the allegations.

In any reply that you make, please chronologically and specifically state your account of the events and include copies of any particularly pertinent documents to which you refer.

Thomas Patrick Connelly, Esquire
September 19, 2022
Page 16

Generally, it is most helpful if your response deals item by item with the allegations contained in the numbered paragraphs in this letter, as well as with the cited Rules.

Please be advised that §85.13 of the Disciplinary Board Rules requires that any response to this letter:

...that contains an averment of fact not appearing of record or a denial of fact shall include or be accompanied by a verified statement signed by the respondent-attorney that the averment or denial is true based upon knowledge or information or belief. The respondent-attorney need not aver the source of the information or expectation of ability to prove the averment or denial. The verified statement may be based upon personal knowledge as to a part and upon information or belief as to the remainder.

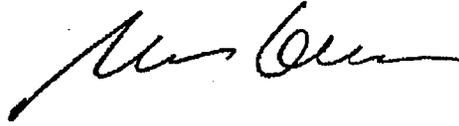
Although you are required to submit a response to this letter, if we do not hear from you within thirty days, we will assume that you do not desire to submit your position with respect to this complaint and can proceed to make our recommendation for an appropriate disposition on the basis of the information and material contained in our file, including your failure to respond in violation of Pa.R.D.E. 203(b) (7). However, we would certainly prefer to have the benefit of your position before making our recommendation.

Keep in mind that we may provide the complainant with a copy of your statement of position or a summary of it for the express purpose of obtaining a replication, unless you request that the content of your answer, either in total or in part, not be revealed and state reasons thereof which represent good cause. If we do provide the complainant with a copy or summary of your position, we will remind the complainant of the confidentiality of our inquiry.

If you have any questions, you or your counsel should not hesitate to contact this office. Thank you for your anticipated cooperation and assistance in this important matter. We look forward to receiving your response.

Very truly yours,

Thomas Patrick Connelly, Esquire
September 19, 2022
Page 17

A handwritten signature in black ink, appearing to read "Mark Gilson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mark Gilson
Disciplinary Counsel

MFG:rbc
SENT VIA EMAIL AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas J. Farrell
Chief Disciplinary Counsel

Raymond S. Wierciszewski
Deputy Chief Disciplinary Counsel

Anthony P. Sodroski
Disciplinary Counsel-In-Charge,
Special Projects

District I Office
1601 Market Street
Suite 3320
Philadelphia, PA 19103-2337

(215) 560-6296
FAX (215) 560-4528

THE DISCIPLINARY BOARD
OF THE
SUPREME COURT OF PENNSYLVANIA



OFFICE OF DISCIPLINARY COUNSEL
www.padisciplinaryboard.org

Disciplinary Counsel-In-Charge
Ramona M. Mariani

Disciplinary Counsel
Richard Hernandez
Gloria Randall Ammons
Harriet R. Brumberg
Michael D. Gottsch
Jeffrey M. Krulik
Mark F. Gilson

November 15, 2022

PERSONAL AND CONFIDENTIAL

Thomas Patrick Connelly, Esquire
23 Petsch Road
Reading, PA 19606

Re: Complaint of Office of Disciplinary Counsel
File No. C2-22-756
DB-7 REQUEST FOR STATEMENT OF RESPONDENT'S POSITION

Dear Mr. Connelly:

Please be advised that this office is currently considering a complaint against you opened on motion of Office of Disciplinary Counsel. It is important for you to understand that issuance of this letter means that the complaint against you has survived this office's initial screening process and that, based upon the information currently available to us, it appears that your conduct may have violated the Rules of Professional Conduct.

It is also important for you to understand that it is the obligation of this office to develop all information relevant to a complaint, including the information which may justify or exonerate the alleged actions of the respondent-attorney or mitigate the seriousness of any violations that may have occurred. Since this complaint has survived our initial screening process you should retain or consult with counsel before submitting a statement of your position.

The alleged facts presently under consideration are as follows:

1. You are a lawyer admitted to the practice of law in Pennsylvania on November 7, 2005.

2. On July 23, 2021, you initiated a medical malpractice case in the Berks County Court of Common Pleas by filing a *Praecipe for Summons* requesting writs of summons issue in a matter captioned: *Thomas P. Connelly, Jr., v. Surgical Institute of Reading and Paul C. Neuman, D.O.*, civil docket no. 21-11881 (hereinafter "the medical malpractice case").

3. You initially were represented in the medical malpractice case by Joseph D. Lento, Esquire.

4. Defendant, Surgical Institute of Reading, was represented by attorneys David Matthew McGeady, Esquire, and Evan G. O'Connor, Esquire.

5. Defendant, Dr. Paul C. Neuman, was represented by Kevin H. Wright, Esquire.

6. The medical malpractice case was assigned to Judge J. Benjamin Nevius of the Berks County Court of Common Pleas.

7. On October 7, 2021, and October 28, 2021, respectively, defendants Surgical Institute of Reading and Dr. Neuman (hereinafter collectively referred to as "the defendants"), each filed separate *Praecipe for Rule to File Complaint* in the medical malpractice case.

8. You received the defendants' *Praecipe for Rule to File Complaint*.

9. On November 29, 2021, you:

- a. filed a *Complaint Medical Professional Negligence* (hereinafter "the Complaint") in the medical malpractice case; but
- b. failed to file, attach and/or provide a certificate of merit with the Complaint.

10. A certificate of merit for claims relating to professional negligence, medical malpractice, and deviation from an acceptable professional standard by a licensed professional is required pursuant to Pennsylvania Rule of Civil Procedure ("Pa.R.C.P.") 1042.3.

11. You were required to file and/or provide a certificate of merit in the medical malpractice case.

12. You failed to file and/or provide the required certificate of merit in the medical malpractice case.

13. On January 3, 2022, the defendants filed separate *Notice of Intent to Enter Judgment of Non Pros* (hereinafter "Notice of Non Pros") in the medical malpractice case due to your failure to comply with Pa.R.C.P. 1042.3 and file a certificate of merit.

14. The above-referenced Notice of Non Pros included language notifying you that: "Pursuant to Pa.R.C.P. 1042.7, [defendant] intend[s] to enter a Judgment of Non Pros against Plaintiff thirty (30) days of the date of this Notice if a Certificate of Merit is not filed as required by Rule 1042.3."

15. You received the defendants' Notice of Non Pros.

16. On or about February 3, 2022:

- a. the defendants filed separate *Praecipe to Enter Judgment of Non Pros* in the medical malpractice case; and
- b. the Prothonotary entered separate *Notice of Entry of Judgment* (hereinafter "the default judgments") against you in the medical malpractice case based on your failure to file the required certificate of merit.

17. You received the default judgments entered against you in the medical malpractice case.

18. On February 11, 2022, you filed with the trial court:

- a. an *Entry of Appearance of Self-Represented Party* to represent yourself in the medical malpractice case; and
- b. a *Petition to Vacate Default Pursuant to 231 Pa. Code Rule 237.3* (hereinafter "the petition").

19. You failed to file and/or provide a certificate of merit.

20. The trial court:

- a. received the petition; and
- b. by Order dated March 2, 2022, scheduled a hearing for April 5, 2022, to address the petition.

21. At the April 5, 2022, hearing, *inter alia*, you appeared before the court and argued your position in support of the petition.

22. By Order dated May 17, 2022, the trial court:

- a. denied the petition; and
- b. dismissed all claims against the defendants in the medical malpractice case with prejudice.

23. You received this Order.

24. On June 15, 2022, you filed a *Notice of Appeal* from the above-referenced Order to the Pennsylvania Superior Court.

25. By Order dated June 23, 2022, the trial court directed you to file a concise statement of matters complained of on appeal pursuant to Pa.R.A.P. 1925(b).

26. You received this Order.

27. On July 13, 2022, you filed a *Statement of Errors Complained of on Appeal in Accordance with Pa.R.A.P. 1925(b)* (hereinafter "the 1925(b) statement").

28. In the 1925(b) statement, you raised three errors for review on appeal, including, *inter alia*, the following two alleged errors:

- a. "Whether the trial court is biased and/or incompetent, and thereby violated the plaintiff's right to due process of law under the United States Constitution and similar provisions of the Constitution of the Commonwealth of Pennsylvania given that (a) the trial court failed to make findings of fact, credibility determinations, or conclusions of law; (b) the trial court is assisting the attorney-husband (Jeffrey Boyd, Esq., PA. Atty. No. 89033) of the trial court's colleague at the bench, the Hon. Tina Boyd, JCCP, as has the

Hon. James E. Gavin, JCCP in the matter of *Dean v. Brooks*, Berks County CCP No. 22-2612, and as has the Hon. James M. Lillis, JCCP in the matter of *Commonwealth v. Connelly*, CP-06-CR-0001008-2022, as detailed in the matter of *Connelly, et al. v. Green, et al.*, No. 5:22-cv-01163-JMG (EDPA Allentown), all of which the undersigned requests the Court take judicial notice"; and

- b. "Whether the trial court is inherently biased and thereby violated the plaintiff's right to due process of law under the United States Constitution and similar provisions of the Pennsylvania Constitution due to the fact that judges in Pennsylvania are elected, and routinely violate their oaths of office to benefit their political supporters thus ensuring their reelection, as here."

29. The court received a copy of the 1925(b) statement.

30. Jeffrey Boyd, Esquire:

- a. was not a party to the medical malpractice case; and
- b. did not represent any of the parties involved in the medical malpractice case.

31. Judge Boyd, Judge Gavin, and Judge Lillis were not:

- a. assigned to the medical malpractice case; and
- b. involved in the medical malpractice case.

32. The assertions in the 1925(b) statement referenced above in ¶ 28:

- a. had no basis in law or fact;
- b. were unsupported by the evidence of record in the medical malpractice case; and
- c. were frivolous, false, and/or made with reckless disregard for their truth or falsity.

33. You:

- a. had no factual basis or evidence to support your assertions in the 1925(b) statement referenced above in ¶ 28; and
- b. made such assertions knowing them to be false.

34. By Opinion dated August 23, 2022, Judge Nevius issued the trial court opinion in the medical malpractice case, in which, *inter alia*, the court found the 1925(b) statement:

- a. constituted "little more than a brazen attack on the integrity of not only the Trial Court and the other judges of the 23rd Judicial District, but also upon the judicial process in the Commonwealth of Pennsylvania as a whole";
- b. contained "false and reckless allegations...[that] serve only to erode confidence in the judicial process";
- c. asserted "demonstrably false and defamatory allegations of judicial misconduct";
- d. "promote[d] [a] theory in a court filing [regarding an alleged conspiracy by several judges to deprive you of your due process rights] with absolutely no regard for the truth or [your] professional obligations as a licensed attorney"; and
- e. "is, charitably speaking, preposterous, and almost certainly a violation of [your] professional obligations as a licensed attorney under the Pennsylvania Rules of Professional Conduct."

35. You received a copy of the trial court's opinion.

36. The above-referenced appeal to the Superior Court from the trial court's Order dismissing the medical malpractice case is active and pending. See *Thomas P. Connelly, Jr., v. Surgical Institute of Reading and Paul C. Neuman, D.O.*, Docket No. 895 MDA 2022.

37. To date, you have failed to withdraw, correct, modify, and/or amend your 1925(b) statement.

Thomas Patrick Connelly, Esquire
November 15, 2022
Page 7

If the above allegations are true, we are concerned that you may have violated the following Rules of Professional Conduct: RPC 3.1; RPC 3.3(a)(1); RPC 4.4(a); RPC 8.2(a); RPC 8.4(c); and RPC 8.4(d).

Please note that pursuant to Disciplinary Board Rule 87.7(b)(2), Chief Disciplinary Counsel has fixed a shorter time period of ten days of the date of this letter for you to file a statement of position with this office. The Office of Disciplinary Counsel will make no recommendation for the disposition of this complaint until you have been afforded an opportunity to state your position with respect thereto within ten days of the date of this letter. Please note that failure to respond to this request for your statement of position without good cause is an independent ground for discipline pursuant to Rule 203(b)(7) of the Pennsylvania Rules of Disciplinary Enforcement. The Office of Disciplinary Counsel will not agree to any extension of the ten day deadline to provide a response. If you do not respond or provide good cause for failing to respond within 10 days, the Office of Disciplinary Counsel may seek to impose discipline for your violation of Pa.R.D.E. 203(b)(7).

Please be assured that we are not prejudging the alleged facts and charges. Rather, we are conducting an impartial and unbiased investigation with regard to this complaint. In that regard, we will attempt to verify the statements in your answer just as we do with the statements made to us by the complainant. For this reason, and because a lawyer can be subject to discipline for making a materially false statement or deliberately failing to disclose a material fact in connection with a disciplinary matter, you should be careful to be accurate in your factual statements. Additionally, as previously stated, you may wish to consult with counsel before replying to the allegations.

In any reply that you make, please chronologically and specifically state your account of the events and include copies of any particularly pertinent documents to which you refer. Generally, it is most helpful if your response deals item by item with the allegations contained in the numbered paragraphs in this letter, as well as with the cited Rules.

Please be advised that §85.13 of the Disciplinary Board Rules requires that any response to this letter:

...that contains an averment of fact not appearing of record or a denial of fact shall

include or be accompanied by a verified statement signed by the respondent-attorney that the averment or denial is true based upon knowledge or information or belief. The respondent-attorney need not aver the source of the information or expectation of ability to prove the averment or denial. The verified statement may be based upon personal knowledge as to a part and upon information or belief as to the remainder.

Although you are required to submit a response to this letter, if we do not hear from you within ten days, we will assume that you do not desire to submit your position with respect to this complaint and can proceed to make our recommendation for an appropriate disposition on the basis of the information and material contained in our file, including your failure to respond in violation of Pa.R.D.E. 203(b)(7). However, we would certainly prefer to have the benefit of your position before making our recommendation.

Keep in mind that we may provide the complainant with a copy of your statement of position or a summary of it for the express purpose of obtaining a replication, unless you request that the content of your answer, either in total or in part, not be revealed and state reasons thereof which represent good cause. If we do provide the complainant with a copy or summary of your position, we will remind the complainant of the confidentiality of our inquiry.

If you have any questions, you or your counsel should not hesitate to contact this office. Thank you for your anticipated cooperation and assistance in this important matter. We look forward to receiving your response.

Very truly yours,

OFFICE OF DISCIPLINARY COUNSEL



Mark Gilson
Disciplinary Counsel

Thomas Patrick Connelly, Esquire
November 15, 2022
Page 9

SENT VIA EMAIL AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas J. Farrell
Chief Disciplinary Counsel

Raymond S. Wierciszewski
Deputy Chief Disciplinary Counsel

Anthony P. Sodroski
Disciplinary Counsel-In-Charge,
Special Projects

District I Office
1601 Market Street
Suite 3320
Philadelphia, PA 19103-2337

(215) 560-6296
FAX (215) 560-4528

THE DISCIPLINARY BOARD
OF THE
SUPREME COURT OF PENNSYLVANIA



OFFICE OF DISCIPLINARY COUNSEL
www.padisciplinaryboard.org

Disciplinary Counsel-In-Charge
Ramona M. Marianl

Disciplinary Counsel
Richard Hernandez
Gloria Randall Ammons
Harriet R. Brumberg
Michael D. Gottsch
Jeffrey M. Krulik
Mark F. Gilson

October 31, 2023

PERSONAL AND CONFIDENTIAL

Thomas Patrick Connelly, Jr.
435 Kauffman Road
Annville, PA 17003

Re: Complaint of Colleen S. Gallo, Esquire
File No. C2-23-1004

DB-7 REQUEST FOR STATEMENT OF RESPONDENT'S POSITION

Dear Mr. Connelly:

Please be advised that this office is currently considering a complaint against you from Colleen S. Gallo, Esquire, Barley Snyder, LLP, 1601 Cornwall Road, Lebanon, PA 17042. It is important for you to understand that issuance of this letter means that the complaint against you has survived this office's initial screening process and that, based upon the information currently available to us, it appears that your conduct may have violated the Rules of Professional Conduct and Pennsylvania Rules of Disciplinary Enforcement.

It is important for you to understand that it is the obligation of this office to develop all information relevant to a complaint, including the information which may justify or exonerate the alleged actions of the respondent-attorney or mitigate the seriousness of any violations that may have occurred. Since this complaint has survived our initial screening process you should retain or consult with counsel before submitting a statement of your position.

The alleged facts currently under consideration are as follows:

Thomas Patrick Connelly, Jr.

October 31, 2023

Page 2

1. By Order dated January 6, 2023, the Supreme Court of Pennsylvania:

- a. placed you on temporary suspension "until further action by this Court"; and
- b. ordered you to comply with all of the provisions of Pennsylvania Rule of Disciplinary Enforcement 217.

2. You received this Order.

3. As a result of being temporarily suspended from the practice of law, you:

- a. became a "formerly admitted attorney," as defined in Pa.R.D.E. 102;
- b. were no longer eligible to practice law in Pennsylvania;
- c. are not permitted to hold yourself out to the public as eligible to practice law in Pennsylvania; and
- d. are prohibited from engaging in any form of "law-related activities" in this Commonwealth, as specified in Pa.R.D.E. 217(j), except under the direct supervision of a member of the Bar of this Commonwealth and only after you and a supervising attorney gave written notice to the Disciplinary Board as required under subsection (j)(5) of Rule 217.

4. On October 19, 2023, you filed a *Praecipe For Summons* in the Lebanon County Court of Common Pleas—Civil Division under case caption: *Thomas P. Connelly, Jr., v. Howard T. Root, et al.*, October Term, no. 2023-01382.

5. In the *Praecipe For Summons* you, *inter alia*:

- a. identified yourself as "Thomas Connelly, Esquire";
- b. provided a "Pa. Atty. Id. No. 200586";
- c. listed your email address as: "tpc@attorneytpc.com"; and

Thomas Patrick Connelly, Jr.

October 31, 2023

Page 3

- d. identified and/or held yourself as an attorney eligible to practice law in Pennsylvania.

If the above allegations are true, we are concerned that you may have violated the following Rules of Professional Conduct and Rules of Disciplinary Enforcement: RPC 5.5(a); RPC 5.5(b); RPC 8.4(d); Pa.R.D.E. 203(b)(3) via Pa.R.D.E. 217(d)(2); 217(j); 217(j)(1); 217(j)(4)(iv); and 217(j)(5).

The Office of Disciplinary Counsel will make no recommendation for the disposition of this complaint until you have been afforded an opportunity to state your position with respect thereto within thirty (30) days of the date of this letter. Please note that failure to respond to this request for your statement of position without good cause is an independent ground for discipline pursuant to Rule 203(b)(7) of the Pennsylvania Rules of Disciplinary Enforcement. The Office of Disciplinary Counsel will only agree to a limited extension of the thirty-day deadline when the request is made for specific reasons constituting good cause. If you do not respond or provide good cause for failing to respond within 30 days, the Office of Disciplinary Counsel may seek to impose discipline for your violation of Pa.R.D.E. 203(b)(7).

Please be assured that we are not prejudging the alleged facts and charges. Rather, we are conducting an impartial and unbiased investigation with regard to this complaint. In that regard, we will attempt to verify the statements in your answer just as we do with the statements made to us by other persons. For this reason, and because a lawyer can be subject to discipline for making a materially false statement or deliberately failing to disclose a material fact in connection with a disciplinary matter, you should be careful to be accurate in your factual statements. Additionally as previously stated, you may wish to consult with counsel before replying to the allegations.

In any reply that you make, please chronologically and specifically state your account of the events and include copies of any particularly pertinent documents to which you refer. Generally, it is most helpful if your response deals item by item with the allegations contained in the numbered paragraphs in this letter, as well as with the cited Rules.

Please be advised that §85.13 of the Disciplinary Board Rules requires that any response to this letter:

Thomas Patrick Connelly, Jr.

October 31, 2023

Page 4

...that contains and averment of fact not appearing of record or a denial of fact shall include or be accompanied by a verified statement signed by the respondent-attorney that the averment or denial is true based upon knowledge or information or belief. The respondent-attorney need not aver the source of the information or expectation of ability to prove the averment or denial. The verified statement may be based upon personal knowledge as to a part and upon information or belief as to the remainder.

If we do not hear from you within thirty (30) days, we will assume that you do not desire to submit your position with respect to this complaint and can proceed to make our recommendation for an appropriate disposition on the basis of the information and material contained in our file. However, we would certainly prefer to have the benefit of your position before making our recommendation.

If you have any questions, you or your counsel should not hesitate to contact this office. Thank you for your anticipated cooperation and assistance in this important matter. We look forward to receiving your response.

Very truly yours,

Jennifer Flemister
Disciplinary Counsel

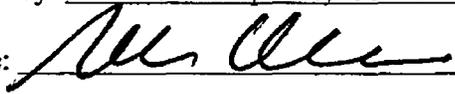
JF:xxx

SENT VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED, and
EMAIL TO: tpc@attorneytpc.com

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Office of Disciplinary Counsel

Signature: 

Name: Mark F. Gilson, Disciplinary Counsel

Attorney No.: 46400

Thomas J. Farrell
Chief Disciplinary Counsel

Raymond S. Wierciszewski
Deputy Chief Disciplinary Counsel

Anthony P. Sodroski
Disciplinary Counsel-In-Charge,
Special Projects

District I Office
1601 Market Street
Suite 3320
Philadelphia, PA 19103-2337

(215) 560-8296
FAX (215) 560-4528

THE DISCIPLINARY BOARD
OF THE
SUPREME COURT OF PENNSYLVANIA



OFFICE OF DISCIPLINARY COUNSEL
www.padisiplinaryboard.org

February 12, 2024

PERSONAL AND CONFIDENTIAL

Disciplinary Counsel-In-Charge
Ramona M. Mariani

Disciplinary Counsel
Richard Hernandez
Gloria Randall Ammons
Harriet R. Brumberg
Michael D. Gottsch
Jeffrey M. Krulik
Mark F. Gilson

RECEIVED
02/12/2024
PA Disciplinary Board
Executive Office

FILED ELECTRONICALLY

Marcee D. Sloan, Board Prothonotary
The Disciplinary Board of the
Supreme Court of Pennsylvania
Pennsylvania Judicial Center
601 Commonwealth Avenue, Suite 5600
P.O. Box 62625
Harrisburg, PA 17106-2625

RE: In the Matter of Thomas Patrick Connelly, Jr.
No. 2936 DD3
No. 166 DB 2022
ODC File Nos. C2-22-270; C2-22-271; C2-22-756; & C2-23-1004
Attorney Registration No. 200586
(Philadelphia County)

Dear Ms. Sloan:

Attached for filing is a *Resignation Under Pa.R.D.E. 215* endorsed by Respondent, Thomas P. Connelly, Jr., with attached Exhibits and a Certificate of Compliance with the provisions of the Public Access Policy. Please note, Respondent submitted his resignation before a petition for discipline was filed against him.

Respondent is a former attorney. Pursuant to Pennsylvania Supreme Court Order dated January 6, 2023, Respondent was placed on temporarily suspension pending further action by the Court. Otherwise, Respondent has no history of discipline.

Marcee D. Sloan, Board Prothonotary
February 12, 2024
Page 2

Respondent is not represented by counsel in his disciplinary matters; however, he is represented by Corey Stern Chwiecko, Esquire, in a criminal case that was charged in connection with Respondent's conduct during ODC's investigation into his disciplinary matters. Respondent's criminal case is pending and awaiting trial in the Berks County Court of Common Pleas-Criminal Division.

Respondent is currently in custody at the Berks County Jail awaiting trial in his criminal case. His current contact information and mailing address is:

Thomas P. Connelly, Jr., BCJS# 2019-2907
Berks County Jail System
1287 County Welfare Road
Leesport, PA 19533.

I certify that I have this day sent a copy of this letter and its attachments to Respondent by first class mail, as well as to Attorney Chwiecko by email. In addition, I am providing copies of this letter and its attachments to individuals as indicated below.

Very truly yours,



Mark Gilson
Disciplinary Counsel

MFG:rbc

Attachments

cc: (by first class mail)

Mr. Thomas P. Connelly, Jr., Respondent

(by email)

Corey Stern Chwiecko, Esquire (criminal counsel for Respondent)

Assistant District Attorney Kevin Howard, BerksCo DAO

Thomas Farrell, Chief Disciplinary Counsel

Raymond S. Wierciszewski, Deputy Chief Disciplinary Counsel