

July 16, 2025

Council Member Vickie Paladino
Attn: Council Speaker Hon. Adrienne Adams
Attn: Standards and Ethics Committee Chair Hon. Sandra Ung
New York City Council
250 Broadway
New York, New York 10007

Re: Cease and Desist: Defamation of Claudia Morales

Council Member Paladino:

We are writing in relation to a series of posts made from your official and verified account on the social media site “X” concerning Claudia Morales, a New York City resident who witnessed the murder of her boyfriend, Ryan Carson, in Brooklyn in 2023. Your misuse of elected office to defame a private citizen for political gain has forced Ms. Morales to seek legal representation, and we are formally demanding that you cease and desist all such communications concerning our client and issue a public apology for your defamatory statements.

In response to a photo Ms. Morales posted with the Democratic nominee for NYC mayor, Zohran Mamdani, you made demonstrably false, defamatory, and inflammatory statements that further victimized Ms. Morales and incited violent threats against her, including:

1. Falsely asserting that Ms. Morales did not immediately call the police when her partner and love of her life, Ryan, was stabbed to death, and claiming this was “because the murderer was nonwhite and her politics dictate that police are the real evil.” **Ms. Morales immediately called 911 and desperately attempted to render first aid to Ryan until first responders arrived.**
2. Falsely asserting that Ms. Morales intentionally interfered in the investigation and that her inability to immediately identify the person who killed Ryan—a stranger—was insincere and “likely on purpose to hinder the prosecution and ensure the murderer walked free.” **A deeply traumatized Ms. Morales fully cooperated with law enforcement at every stage of the investigation and prosecution of Ryan’s murder, which culminated in the conviction of the teen who killed him.** This involvement included remaining in a police precinct overnight while covered in Ryan’s blood on the night of the murder to await the arrival of detectives, extensive interviews with police personnel, full cooperation in identifying the suspect, full cooperation with the Kings County District Attorney’s Office, testifying in the Grand Jury on Ryan’s birthday resulting in an indictment, attending every court date during monthslong proceedings, accompanying Ryan’s parents to meetings with law enforcement personnel, and providing a victim impact statement.

You are and were aware of each of these facts, which are a matter of public record in the city where you hold office. Nevertheless, even after being publicly confronted with these truths, you made multiple

statements doubling down upon your abhorrent treatment of Ms. Morales and continued to misuse your elected position as a bully pulpit for unlawful purposes. Such statements include, but are not limited to:

1. “[Ms. Morales] made herself a public figure and uses the event [of Ryan’s murder] as a springboard for her politics. She’s a DSA celebrity specifically because of this. If she’s going to politicize the murder of her boyfriend, then the street goes both ways.” **This is a statement of your intent to continue to engage in this dangerous behavior and constitutes an ongoing threat to Ms. Morales’ safety.**
2. Referring to Ms. Morales’ state of shock following the murder as “[t]he shock of reality colliding with her politics.” **Neither Ms. Morales nor her “politics” were in any way responsible for Ryan’s murder. Her trauma is real.**

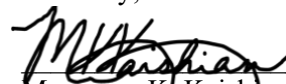
As an eyewitness to the sudden, brutal, and senseless murder of her loving partner whose life was also threatened, Ms. Morales is herself a victim of a violent crime. That she recognizes the personhood of the mentally ill teen who took Ryan’s life during a psychiatric episode is a testament to her strength and capacity to see outside of herself when considering how New York City might be made a safer place for all its residents. That you lack the same capacity does not afford you grounds to defame a private citizen.

In addition to being liable for defamation, as an elected official, you are held to a higher standard than the average person. You have used the gravitas of your position to defame Ms. Morales in an attempt to punish her for her political beliefs and expression. Accordingly, your statements constitute retaliation under the First Amendment of the United States Constitution and violate New York State law. This remains true despite claims made by your Council staff members to concerned callers seeking an end to this harassment that you, in sum and substance, “have free speech because this is America.” Indeed, it is Ms. Morales who may avail herself of this great nation’s constitutional protection here.

Your conduct has caused Ms. Morales to suffer significant harm and has further ignited a wave of vile online harassment and threats that put Ms. Morales and her loved ones’ safety at risk. You were well-aware of these readily foreseeable outcomes and the clear falsity of your claims when you made them. Merely deleting the original “X” post while your false assertions continue to circulate is insufficient remediation for your behavior. Accordingly, we hereby demand that you: (1) Immediately cease and desist from making any and all statements concerning Claudia Morales, with the exception of a public apology; (2) Provide my office with prompt written assurance within two (2) days that you will cease and desist from all further defamation of Ms. Morales; and (3) Promptly publish a retraction and apology for your demonstrably false and defamatory statements.

We also urge the City Council and Speaker Adams to take further action commensurate with this abuse of public office, including as authorized under NYC Charter Ch. 2, § 45.

Sincerely,



Maryanne K. Kaishian, Partner

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