UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)
	)
	)
v.	) Case No. 19-148-1 (CKK)
	)
PRAKAZREL MICHEL (1),	) **DECLARATION OF PETER R.**
	) **ZEIDENBERG IN SUPPORT OF**
	) **PRAKAZREL MICHEL'S**
Defendant.	) **MOTION FOR NEW TRIAL**

Peter R. Zeidenberg hereby declares as follows:

1.   I am a partner at the law firm of ArentFox Schiff LLP, who have been attorneys of record for Defendant Prakazrel "Pras" Michel since August 25, 2023.

2.   I submit this Declaration in support of Defendant Prakazrel Michel's Motion for a New Trial.

3.   Attached as **Exhibit A** is a true and correct copy of screen-shots taken from the law firm website of David Kenner, Mr. Michel's lead trial counsel, when Kenner's law firm was Kenner & Greenfield, using the "Wayback Machine" to capture images from previous years, in these instances, from July 6, 2019 and October 21, 2018.[1] The website appears to no longer be active. The screen-shots show Mr. Kenner's areas of expertise and sample cases. More recently, Mr. Kenner reportedly represented rapper Daystar Peterson, known as "Tory Lanez," who was convicted of shooting rapper Megan Pete, known as "Megan Thee Stallion," in the foot.[2]

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[1]   https://web.archive.org/web/20190706142516/http://kennergreenfield.com/;   https://web. archive.org/web/20181021013002/http://kennergreenfield.com/media/.

[2] https://thesource.com/2023/01/10/lawyer-david-kenner-denies-representing-suge-knight-in-hit-and-run-case-after-being-hired-by-tory-lanez/

4.   Attached as **Exhibit B** is a true and correct copy of the LinkedIn page of Alon Israely, Mr. Kenner's co-counsel at the trial of Mr. Michel, evincing no litigation experience.

5.   After Mr. Michel retained ArentFox Schiff LLP, we were advised by Mr. Michel's former publicist that Mr. Kenner indicated that he had used an experimental AI program to write the closing argument during Mr. Michel's trial. We also found evidence indicating that this was true. Specifically, we identified a May 10, 2023 press release issued by a company called EyeLevel after the trial that stated: "EyeLevel.AI's litigation assistance technology made history last week, becoming the first use of generative AI in a federal trial. The case involved Pras Michel, a former member of the hip-hop band The Fugees, who was on trial for international fraud charges." The press release quoted Mr. Kenner, stating: "'This is an absolute game changer for complex litigation,' said Michel's lead attorney David Kenner. 'The system turned hours or days of legal work into seconds. This is a look into the future of how cases will be conducted.'" A true and correct copy of a printout of the press from the Internet is attached as **Exhibit C.**

6.   We also identified a LinkedIn post from Neil Katz, who appears to work for EyeLevel, that stated: "AI Goes to Court? Excited to announce that an AI startup I've been working on is now the first use of AI in a federal criminal trial. Defense lawyers for Fugees star Pras Michel used our platform to rapidly research and help draft closing arguments. It's never been done before. And we're just getting started. Lots more AI power tools to come." A true and correct copy of a printout of the LinkedIn post from the Internet is attached as **Exhibit D.** Michel's prior publicist also informed members of the current defense team that Kenner proudly stated at the end of the trial words to the effect of "AI wrote our closing."

7.   The current defense team recently concluded that Mr. Kenner and Alon Israely, Mr. Kenner's co-counsel at trial, had a financial interest in the AI program Mr. Kenner apparently used

to write his closing argument, which likely explains why he used it and then boasted about it after trial. The press release that quoted Kenner stated that the company launched the AI program "with technology partner CaseFile Connect." **Ex. C.** The CaseFile Connect website[3] does not identify its owners, but it lists its principal office address as 16633 Ventura Blvd., Suite 735. A true and correct copy of a printout of the CaseFile Connect website is attached as **Exhibit E.** The California Bar website[4] indicates that 16633 Ventura Blvd., Suite 735 is the office address for Mr. Kenner's law firm. A true and correct copy of a printout of the bar website is attached as **Exhibit F.** Open sources[5] further indicate that the third office address CaseFile Connect's website provides is associated with Mr. Israely. A true and correct copy of a printout of the website that provides this information is attached as **Exhibit G**. This evidence appears to confirm that Mr. Kenner and Mr. Israely had a financial interest in the AI program Mr. Kenner used to write the closing argument and then boasted about after trial.

8.   Current defense counsel have spoken with Joel Denaro, a trial attorney at Joel Denaro P.A., based in Miami. Upon information and belief, Mr. Denaro has been a practicing attorney since 1999, and does both civil and criminal litigation. Mr. Denaro attended New York Law School with Mr. Israely, who previously served as co-counsel for Mr. Michel. Mr. Denaro indicated that he is close personal friends with Mr. Israely; they both attended law school together. According to Mr. Denaro, Mr. Israely is not a practicing attorney. He co-founded an e-discovery company called BIA (Business Intelligence Associates), which was later acquired by Haystack in or about September 2022. According to Mr. Denaro, Mr. Israely and Mr. Kenner are family friends through Mr. Kenner's daughter, who went to law school with Mr. Israely.

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[3] https://casefileconnect.com/about/
[4] https://apps.calbar.ca.gov/attorney/Licensee/Detail/41425
[5] https://www.fastpeoplesearch.com/address/350-canal-st-unit-101_new-york-ny-10013

9.   Mr. Denaro indicated that he first learned that Mr. Israely was involved in Mr. Michel's case when he saw the article in *Bloomberg Business*. A few weeks later, shortly before the start of the trial, Mr. Israely called him up and asked if he would fly to Los Angeles to help with trial preparation. Mr. Denaro had the impression that Mr. Israely did not believe that the trial preparation was proceeding as it should. Mr. Denaro stated that he received a small retainer from Mr. Michel and flew to Los Angeles to try and help Mr. Kenner and Mr. Israely prepare for trial.

10.   Mr. Denaro indicated that, when Mr. Denaro arrived at Mr. Kenner's offices, it was clear to him that the trial team was unprepared. For one thing, Mr. Kenner was not familiar with some of the key documents that were referenced in the Superseding Indictment. For another, Mr. Kenner did not seem to be familiar with FARA or the money laundering statute and how it applied to the alleged facts. Mr. Denaro stated that he tried to explain aspects of the money laundering statute to Mr. Kenner, but did not believe Mr. Kenner understood what he was trying to explain or the possible defenses he suggested.

11.   Mr. Denaro indicated that during the several days he was at Mr. Kenner's offices – which was only about 10 days before the start of the trial – Mr. Denaro was told that defense was going to get an expert on FARA and was asked if he had any recommendations. Mr. Denaro did recommend a well-regarded expert on FARA but this individual was not retained. This expert later told Mr. Denaro that he believed Mr. Kenner had not carefully read the Superseding Indictment and did not have a handle on the facts of the case.

12.   Mr. Denaro indicated that, from what Mr. Denaro observed, there were no hard copies of discovery materials in the office, and he did not see binders of 302s, government exhibits or grand jury testimony. If Mr. Kenner wanted to see a document, Mr. Israely would put it on a

monitor to view. It was Mr. Denaro's understanding that Mr. Kenner did not use computers himself.

13.   Mr. Denaro did not wish to submit a declaration to the Court in connection with Mr. Michel's motion for a new trial. He did indicate that he would be willing to testify truthfully if there were a hearing on this matter and he was required to testify.

14.   Current defense counsel have also asked Mr. Kenner for basic discovery, such as the FD-302 FBI witness interview memos, but Mr. Kenner indicated that he does not have these and referred new counsel to the e-discovery vendor. The e-discovery vendor declined to make the discovery available to current defense counsel because its bills for work performed at Mr. Kenner's request remain unpaid.

15.   Current defense counsel have reviewed the invoices that the e-discovery vendor Business Intelligence Associates (BIA) and Haystack, which acquired BIA, generated to bill for attorney time related to Mr. Michel's defense. They reveal that contract attorneys performed such critical tasks as drafting the opening statement; drafting motions; preparing direct examination of Mr. Michel; preparing cross-examination of key government witness such as Elliott Broidy, George Higginbotham, and Agent Heuchling; and drafting jury instructions. Information gleaned from public sources indicate that none of these contract attorneys appear to have relevant white-collar experience for such tasks. For example, the lead contract attorney states on his website that he is a malpractice attorney who "helps people who have been harmed by medical malpractice… [and] devotes 100% of his practice to medical malpractice cases." None of these contract attorneys had relevant litigation experience for such tasks.

16.   Through his counsel, despite the request of Mr. Michel's current counsel, Mr. Kenner declined to provide copies of the sealed exhibit of medical records he previously filed with the Court in support of his Motion to Continue Trial Date.

17.   Through their respective attorneys, Mr. Kenner and Mr. Israely have declined to speak with Mr. Michel's current counsel about Mr. Michel's trial.

I declare under the penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information, and belief.

Dated: October 16, 2023
                Washington, D.C.

Peter Zeidenberg

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The Wayback Machine - https://web.archive.org/web/20190706142516/http://kennergreenfield.com/

KENNER & GREENFIELD

Criminal Defense Attorneys, Los Angeles

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Simple Posession

Using or Being Under the Influence of a Controlled Substance

Selling/Offering to Sell and/or Transport a Controlled Substance

Manufacturing a Controlled Substance

Simple Possession of Marijuana

About Kenner & Greenfield

Kenner & Greenfield is a California based law firm with a practice that is national in scope providing comprehensive criminal defense services to clients throughout the United States in both State and Federal courts. The firm has enormous experience in representing defendants against a wide range of charges including white collar crimes and drug and narcotics offenses. At Kenner & Greenfield, our criminal defense attorneys have established a practice with a distinguished reputation, anchored by decades of trial and appellate experience. From simple possession charges to prominent white collar political corruption cases, we provide clients with the expertise needed to obtain dismissals, acquittals, and reduced penalties in even the most difficult situations. Our attorneys handle all types of state and federal felonies and misdemeanors, as well as a variety of civil litigation matters. In recognition of our work, the firm has been rated AV Preeminent by Martindale Hubbell, the national directory of attorneys, indicating that fellow attorneys rank us the highest standards of professionalism and ethics. If you are under investigation or facing criminal charges, contact Kenner & Greenfield for a free initial consultation with an experienced attorney. If you are unable to meet during the week, we offer evening and weekend meetings by appointment. We are devoted to supporting our clients, and are available when you need us, 24-7. Members of our staff speak Spanish.

David E. Kenner

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Areas of Practice

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Reckless Driving

Failure to perform duty following accident/Hit and Run

Money Laundering

Fraud/Forgery

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K&G

Criminal Defense Attorneys, Los Angeles

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Hells Angels Members Aquitted In 2006 Sturgis Shooting

Former NFL Wide Receiver Sam Hurd arrested on drug charges

Oruncakciel Murder Case

Cotton Club Drug Trafficking Case

Geddes Murder Case

ZZZZ Best - Barry Minkow Fraud Case

ZEIDENBERG DECLARATION EX. B

Alon L. Israely, Esq. CISSP

Technology & Business
Greater Seattle Area

Contact

www.linkedin.com/in/ai-tech
(LinkedIn)

Top Skills

Litigation Support
Computer Forensics
Forensic Analysis

Languages

Hebrew
Spanish

Certifications

CISSP
ESQ

Summary

EXPERIENCE

Alon Israely, Esq., CISSP has over twenty years of experience in a variety of advanced computing-related technologies and areas. Alon currently consults on issues related to information security and data privacy.

Alon is the Co-Founder of TotalDiscovery, an industry leading SaaS application that provides secure, legally defensible features and workflows, used by enterprises and government to manage the complex requirements of document preservation and discovery.

Alon has served as a Senior Advisor in BIA's Advisory Services group and worked with multi-national corporations and global law firms to architect and implement legal compliance, information security and risk mitigation solutions.

Prior to that, Alon consulted with corporations and law firms on legal compliance, information security and related technology issues – including working as an expert witness in the fields of digital forensics and evidence management. Alon was also a senior member of several IT teams working on projects for Fortune 500 companies related to global network architecture and data migrations projects for enterprise information systems.

As a pioneer in the field of secure digital evidence collection and handling, Alon has worked on a wide variety of matters, including several notable financial fraud cases, large-scale multi-party international lawsuits and corporate matters involving the SEC, FTC, and international regulatory boards.

Alon holds a B.A. from UCLA and received his J.D. from New York Law School with an emphasis in Telecommunications Law. He is a member of the New York State Bar as well as several legal and computer forensic associations.

BAR ADMISSIONS

- New York

Page 1 of 3

MEMBERSHIPS

- Member, Certified Fraud Examiners
- American Bar Association
- New York Bar Association
- New York County Lawyers Association
- InfraGard
- (ISC) 2

Experience

InfoSec & Online Privacy Solutions
Senior Consultant
July 2018 - Present (5 years 4 months)

TotalDiscovery, LLC
Co-Founder & CEO
January 2013 - June 2018 (5 years 6 months)

Drive the strategic vision for the company.

Business Intelligence Associates, Inc. (BIA)
Manager, Strategic Partnerships
2002 - December 2012 (10 years)
NYC

Oak Tree Intelligence
Senior Examiner
2000 - 2002 (2 years)

Globix Corporation
2 years

Senior Technical Consultant
1998 - 2000 (2 years)

Streaming Media Consultant
1998 - 1999 (1 year)

Ergonomic Efficiency
Partner & CTO

1995 - 1998 (3 years)

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Education

UCLA

B.A., History, Emphasis in Emerging Market Economies

New York Law School

Juris Doctor, Telecommunications Law Program

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PRODUCT UPDATES

First Use of AI in Federal Trial: EyeLevel's Litigation Assist Aids Defense in Pras Michel Fraud Case

WASHINGTON, D.C., May 10 - EyeLevel.AI's litigation assistance technology made history last week, becoming the first use of generative AI in a federal trial. The case

involved Pras Michel, a former member of the hip-hop band The Fugees, who was on trial for international fraud charges.

EyeLevel's litigation assistance tools were developed in partnership with experts in discovery, litigation, and legal data management and launched with technology partner CaseFile Connect. The primary benefit of this cutting-edge technology is speed to intelligence throughout the litigation process. Lawyers can obtain complex answers about the facts of their case in a fraction of the time compared to traditional legal search methods or advanced legal analytics.

"This is an absolute game changer for complex litigation," said Michel's lead attorney David Kenner. "The system turned hours or days of legal work into seconds. This is a look into the future of how cases will be conducted."

EyeLevel's Lit Assist offers critical insights faster than human efforts and conventional technologies alone. From motion drafting and early case assessment to M&A due diligence and appeals work, EyeLevel's legal intelligence system is engineered to excel in the legal domain.

Far from eliminating lawyers, this revolutionary technology helps lawyers become 10X faster and more effective, allowing them to focus on high-value tasks and strategic decision-making.

This landmark event signals a new era in legal technology, showcasing the transformative potential of AI in the courtroom and the legal profession. EyeLevel.AI is committed to

empowering legal professionals with innovative tools that streamline workflows, reduce costs, and enable unparalleled insights into their cases, matters, and deals.

To learn more about EyeLevel.AI and its groundbreaking legal AI system, please visit www.eyelevel.ai or contact Neil Katz, Co-Founder and COO, at neil.katz@eyelevel.ai.

EyeLevel.AI is a leading provider of advanced AI solutions for several critical verticals including the legal sector. The company's mission is to empower professionals with cutting-edge technology that streamlines workflows, reduces costs, and enables them to gain unparalleled insights into their cases, matters, and deals. EyeLevel.AI is dedicated to transforming the legal industry through the power of AI.

CaseFile Connect is the only secure, privileged-protecting platform that enables attorneys and their incarcerated clients to remotely collaborate, review and annotate discovery documents and multimedia, attend video-chat consultations and exchange notes to better prepare for legal proceedings and trial. Find out how you can join the CaseFile Connect pilot program at membership@casefileconnect.com

Written by

EyeLevel.AI Staff

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AI Goes to Court?

Excited to announce that an AI startup I've been working on is now the first use of AI in a federal criminal trial. Defense lawyers for Fugees star Pras Michel used our platform to rapidly research and help draft closing arguments.

It's never been done before. And we're just getting started. Lots more AI power tools to come.

https://lnkd.in/e-EgdPGB

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About Us

Led by a team with over 150 years of combined legal and technology experience.

CaseFile Connect is a project many years in the making and which was accelerated during the recent pandemic.

Hundreds of thousands of incarcerated individuals are without access to their discovery record, counsel visitation and the ability to assist in their own defense to ensure their case is progressing through the already gummed-up wheels of justice.

CaseFile Connect is composed of a group of seasoned and well-respected criminal defense attorneys from across the United States and a group of pioneering legal technologists, software designers and cybersecurity professionals who came together to design, build and deploy the only secure, remote private system that allows for guaranteed privileged conversations and case file collaboration.

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Our mission is to make it easy for incarcerated clients to enjoy their 5th and 6th Amendment rights to due process and effective assistance of counsel by offering their attorneys a solution that passes the muster of the facility security and safety requirements while using modern technology to ensure privileged is maintained.

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To help CaseFile Connect drive change for the better for our criminal justice system and for social justice, donate to our foundation by sending an email to socialjustice@casefileconnect.com for more details.

CaseFile Connect

CaseFile Connect is the only secure, privileged-protecting platform that enables attorneys and their incarcerated clients to remotely collaborate, review and annotate discovery documents and multimedia, attend video-chat consultations and exchange notes to better prepare for legal proceedings and trial.

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Las Vegas
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Las Vegas, NV 89101

New York
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New York, NY 10013

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The State Bar *of California*

David Elliot Kenner #41425
License Status: Active

Address: KENNER LAW FIRM, 16633 Ventura Blvd Ste 735, Encino, CA 91436-1833
Phone: 818-995-1195 | Fax: 818-475-5369
Email: David@KennerLaw.com | Website: Not Available

More about This Attorney ▼

All changes of license status due to nondisciplinary administrative matters and disciplinary actions.

Date	License Status ❶	Discipline ❶	Administrative Action ❶
Present	Active		
4/17/2003		Discipline, probation; no actual susp. 02-C-10990 ❶	
3/22/2002		Conviction record transmitted to State Bar Court 02-C-10990 ❶	
1/5/1968	Admitted to the State Bar of California		

Here is what you need to know to access discipline documents in public cases:

Documents are added to the State Bar Court's online docket as events occur.

Search for a Case

To search for a case, please copy the case number displayed above and click Search for a Case. In the search box, paste the complete case number. If the case number begins with "19" or higher, you must add the prefix SBC to the case number, e.g., SBC [CASE NUMBER]. If a case number begins with 18 or lower, there's no need to add SBC.

Most public case records since 2000 are available through search. Older case records are available on request. The State Bar Court began posting public discipline documents online in 2005.

NOTE: Only Published Opinions may be cited or relied on as precedent in State Bar Court proceedings.

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- About the disciplinary system

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Fast PeopleSearch

350 Canal St Unit 101, New York NY 10013   🔍

People Living at
350 Canal St Unit 101, New York NY 10013

3 FREE public property records found associated with this address.

The most recent tenant is **Alon Israely**. Past residents include Lon Leigh, Allison Pearson. FastPeopleSearch results provide address history, property records, and contact information for current and previous tenants.

350 Canal St #101
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🏠 Property Details

Square Feet	Year Built
47,237	**1938**

Last Sale Date	Occupancy Type
2016-04-29	**Non-Owner Occupied**

Ownership Type	Land Use
Corporate	**Post Office**

Property Class	Lot SqFt.
Exempt	**25,587**

Alon Israely
Murray, UT

Age: 50

Current Home Address:

estate associated with Alon Israely in Murray, UT.

6395 S Braxton Ct
Salt Lake City UT 84121

624 Indian Oak Ln, Unit 107
Oak Park CA 91377

573 Grand St, Unit 1507
New York NY 10002

210 3rd Ave S, Unit 5C
Seattle WA 98104

350 Canal St, Unit 101
New York NY 10013

1320 Calle Pensamiento
Thousand Oaks CA 91360

Phone: Cell/Mobile/Wireless and/or landline telephone numbers for Alon Israely in Murray, UT.

(646) 872-2922

(212) 240-2282

(212) 598-3074

AKA: Alias, Nicknames, alternate spellings, married and/or maiden names for Alon Israely in Murray, UT.

Lon Israely • Alon Leigh Israely • Alon Lee • Alon Isrealy • Alon L Israely • Alon Israley • Allison Israely

Relatives: Mother, father, sisters, brothers, spouses and/or former spouses of Alon Israely in Murray, UT.

Alan Corbin • Alon Israely • Brigita Israely • Chenhsiung Lee • Dan Israely • Dan Israely • Dan Israely • Eyal Israely • Henry Lee • Matthew Shieh Lee • Orliyah Finnegan • Sherry Chen • Zahava Israely • Chia Chen

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Alon Israely   Murray, UT   Age 50   VIEW DETAILS ➡