

# GEORGE SASSOWER

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March 7, 1991

Judicial Council  
Circuit Court of Appeals: Third Circuit  
601 Market Street,  
Philadelphia, Pennsylvania 19106-1790

Re: Circuit Judge Collins A. Seitz  
J.C. 91-07

Honorable Sirs:

I hereby petition the judicial council for review of the Chief Judge's order of February 20, 1991, which order imports additional components of misconduct in its attempt to conceal, justify and most important, the refusal to remedy the extant judicial corruption made the subject of petitioner's 28 U.S.C. §372(c) complaint in this matter.

1a. The bottom line is that the federal judiciary can muster, at best, a thousand (1,000) of its members. While affirmant has a potential force in the hundreds of millions--taxpaying citizens who do not believe that monies payable to the federal court should not be diverted to the private pockets of their judicial cronies; -- hard-working people and creditors who do not believe that judicial cronies should not make helpless trusts the subject of larceny -- civilized people who do not believe that anyone, including petitioner, should be repeatedly incarcerated without benefit of a trial, unless they pay millions of dollars to the judicial cronies millions of dollars and agree to a code of silence.

b. In short, "The Second Circuit Ship of Judicial Fools" foreordains disaster for the Third, and any other circuit, while participate, in any respect, in this racket.

2a. As a result of the intentional misconduct, of a criminal magnitude, of Circuit Judge COLLINS A. SEITZ ["Seitz"], in this criminal racketeering adventure:

(1) All of the judicial trust assets of PUCCINI CLOTHES, LTD. ["Puccini"] were made the subject of larceny, leaving nothing for its legitimate stockholders and creditors;

(2) Millions of dollars were criminally extorted from HYMAN RAFFE ["Raffe"] payable to the clients of CLAPP & EISENBERG, P.C. ["C&E"] clients, some of it thereafter transferred to C&E, in order that Raffe avoid incarceration under a trialless criminal conviction and a Referee DONALD DIAMOND ["Diamond"] Report;

(3) Substantial monies payable "to the federal court" were diverted to the private pockets of the C&E clients;

(4) EUGENE PAUL KELLY ["Kelly"], a navy veteran of World War II, had his estate denuded of all its assets by the larcenous activities of a judge and his appointees;

(5) DENNIS F. VILELLA ["Vilella"] has been incarcerated for more than three (3) years for crimes that were never committed, and

(6) The fundamental rights of others, including petitioner, have been transgressed.

b. None of the aforementioned would have occurred, some specifically intended by Judge Seitz, were it not for the Judge Seitz misconduct.

c. Almost everyone in the United States can identify himself, or someone he knows, as being a victim in at least one of the above categories.

d. It is by virtue of that self-identification, that in the forum of the media and public, the misconduct of Judge Seitz will eventually be judged, as well as those who are attempting to conceal His Honor's misconduct.

3a. After the initial Judge Seitz experience, petitioner entertained little hope that the judiciary had the integrity of self-discipline, and only the media, the public and thereafter Congress, could restore constitutional directives, societal values, and the rule of law.

b. The Chief Judge's reasoning and Her Honor's dispositions, in this and related matters, are prescriptions for self-humiliation and self-destruction.

4a. The Chief Judge incorrectly assumes that petitioner made this §372(c) complaint because he is just another "disappointed litigant".

b. On the contrary, Judge Seitz, in order to advance this criminal racketeering adventure, irreparably injured the stockholders and creditors of Puccini; Raffé; the Kelly beneficiaries, Vilella and others, with little permanent injury to petitioner.

5a. The Chief Judge in the corruptly motivated dispositions, makes the unwarranted and unjustified assumption that: (1) everything a judge does in a judicial proceeding is "directly related"; (2) a §372(c) complaint is never available because there is judicial review is always theoretically available, and (3) that a judge has no responsibilities in

bringing to the attention of the proper authorities, including the litigants, those matters which come to his knowledge, whether they be in his judicial or non-judicial capacity.

b. The Chief Judge, in effect, held that the federal judges who filed a §372(a) complaint and the Circuit Court which entertained such complaint in Hastings v. Judicial Conference (829 F.2d 91 [D.C.-1987]) were wrong, since Judge Hastings's conduct were "directly related" to a proceeding before him.

c. The Chief Judge is also holding that anyone who reported that bribe monies were being paid to Chief U.S. Circuit Court Judge Martin T. Manton or Circuit Court Judge J. Warren Davis could not employ the procedures provided in §372(c), if such statute existed fifty (50) years ago.

d. Thus, Congress must be informed, and petitioner so intends, that according to the Chief Judge, that if a judge takes bribe monies to arrive at a particular disposition, it is "directly related", and therefore a 28 U.S.C. §372(c) complaint is not available.

e. The charge made by petitioner was that Judge Seitz was corrupted and fixed. The fact that such corruption and fix was part of a judicial proceedings is irrelevant, and as to such serious charge, Judge Seitz must be compelled to respond.

f. Judge Seitz was mandated to disclose such "fix" at the time he rendered his disposition in of C.A. 88-5441, the time he became a panel member in C.A. 89-5810 and certainly on this §372(c) complaint (Code of Judicial Conduct, Canon 3(A)[4]), which the Chief Judge, as well as Judge Seitz, are now trying to still conceal (In re Boyd, Fl. , 308 So.2d 13 [1975]).

6a. Petitioner, in his §372(c) complaint herein stated that Judge Seitz knew that U.S. District Judge NICHOLAS H. POLITAN was:

"(1) unlawfully presuming to act as a circuit judge in asserting that I did not have a right to appeal; (2) that Judge Politan was unlawfully denying me my absolute right to appeal at that point in time; and (3) criminal 'extortion' was being practiced in the Third Circuit in favor of Clapp & Eisenberg, P.C. all of which met with His Honor's approval (see CCA Docket No. 88-5441).

b. Canon 3(B)3 of the Code of Judicial Conduct states (Administrative Responsibilities):

"A judge should take or initiate appropriate disciplinary measures against a judge or lawyer for unprofessional conduct of which the judge may become aware".

c. With great specificity, petitioner informed the Circuit Court, as was his mandatory duty (Code of Professional Responsibility, DR 1-103) that Raffe was being compelled, under pains of incarceration, to underwrite the fees of C&E for activities in the Third Circuit, and C&E activities were contrary to Raffe's legitimate interests (cf. Wood v. Georgia, 450 U.S. 261, 265 n. 5 [1981]).

d. When no action was taken as to such uncontroverted assertions, along with other facts, petitioner knew that Judge Seitz had been "fixed", with additional confirmatory information thereafter following.

7. Obviously, Judge Seitz did nothing about Judge Politan's misconduct, as Judge Politan was aware beforehand, or else he would not have acted as a "loose torpedo".

8a. The charge of petitioner is that Judge Seitz was "fixed" and "corrupted" in making the disposition in C.A. 88-5441 and the responsibility of Judge Seitz at that point in time was to make a full disclosure of such "fix" (Code of Judicial Conduct, Canon 3(A)[4], and not place the litigant to the trouble and expense, of investigating such patently suspect disposition (In re Boyd, Fl. , 308 So.2d 13 [1975]).

b. The patent attempt by the Chief Judge and Judge Seitz, even at this late date, to avoid making a full disclosure, is simply another level of judicial misconduct, reserved for another §372(c) complaint.

9a. In petitioner's §372(c) complaint he stated:

"By such determination ((Docket No. 89-5810) a prime victim was Hyman Raffe, and a prime beneficiary was Clapp & Eisenberg, P.C.

As a result of the above conduct by Judge Seitz, there has been an uninterrupted flow of extortion monies from Raffe, for efforts which did not inure to Raffe's legitimate benefit (Wood v. Georgia, 450 U.S. 261, 265 n. 5 [1981]). Indeed, the activities of the Clapp firm are adverse to Raffe.

The billings of Clapp & Eisenberg, P.C., are not for 'legal' efforts, as such term is properly employed, but to corrupt judges and officials in the Third Circuit.

The failure of Judge Seitz to initiate any disciplinary procedures against Clapp & Eisenberg, P.C. in the above matters is decisive in this complaint."

March 7, 1991

b. Petitioner watched C&E corrupt [then] U.S. Attorney SAMUEL A. ALITO, JR. ["Altio"], the U.S. Trustee, Bankruptcy Judge DANIEL J. MOORE ["Moore"], Judge Politan and about every other judge and forum, including this Court.

c. The object, openly expressed, was to have a "final accounting" for the court-appointed receiver "approved" -- an accounting which does not exist, it is "phantom".

d. Now this "phantom" "final accounting" has been "approved" -- a fraud known and published by the media, Judge Seitz and those who "fixed" His Honor have been "hoisted by their own petard".

e. Under any view of the facts, the misconduct of Judge Seitz was of a criminal magnitude (Peo. ex rel Price v Sheffield Farms, 225 N.Y. 25, 121 N.E. 474 [1918], per Cardozo, J.) for which there is no immunity, only disgrace.

10a. Until there is full disclosure, an accounting rendered for Puccini, all monies are properly accounted for and petitioner afforded full rights of citizenship -- the disgrace of Judge Seitz and this court will only become exacerbated.

b. Judge Politan having barred petitioner from the courts of New Jersey, petitioner will speak to the people of that state.

Dated: March 7, 1991

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GEORGE SASSOWER

cc: Hon. Dolores K. Sloviter  
Hon. Collins A. Seitz