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Departmental Disciplinary Committee
61 Broadway,
New York, NY 10006

April 30, 2012

Re: Catherine O'Hagan-Wolfe Reg #1720416

Gentlemen:

1. *Catherine O'Hagan Wolfe*, Esq., is Chief Clerk of the U.S. Circuit Court of Appeals for the Second Circuit, and in her in-office activities is engaged in a powerful criminal racketeering operation, which includes the larceny & plundering of judicial trust assets, mandating her disbarment.

Certainly, if the *temporary* "impairment" of trust assets warrants disbarment, *permanent* "deprivation" mandates such ultimate sanction!

2A. This complaint against *Catherine O'Hagan Wolfe*, Esq., here emphasizes her misconduct as is "exclusively" within your jurisdictional powers over attorneys, such as "*disbarment*" for the "*betrayal*" of trust obligation.

B. Thus, to have *Catherine O'Hagan Wolfe*, Esq removed from her present federal position, a complaint is simultaneously being filed with the *Judicial Conference of the United States & Administrative Office of the United States Courts*.

C. For her criminal activities, a complaint is being filed with the *Public Integrity* Section of the *U.S. Department of Justice* and a 28 *U.S.C.* §3332 *Grand Jury* petition is also being prepared!

D. Since the Order issued by *Catherine O'Hagan Wolfe*, purportedly "For the Court" (Exhibit "A"), is part & parcel of an egregious racketeering operation, affecting the public, this material will also be extensively distributed.

3. Investigation reveals there is *no* contemporaneous document, identifying the panel of judges, that authorized *Catherine O'Hagan Wolfe* to issue the Order of August 24, 2010, only recently received!

The panel judges who authorized the issuance of the Order of August 24, 2010, were and are "*phantom*" "*fictitious*" & "*non-existent*"!

Even if this panel of judges existed, and it does not, the disposition made was "*constitutionally & legally impossible*"!

It is because the disposition made was & is "*constitutionally & legally impossible*", that there are no identifiable panel of judges who authorized the disposition made by *Catherine O'Hagan Wolfe*!

"The Immutable & Unassailable Facts"

1. ***All*** the disposable monies & assets in the *Estate of Eugene Paul Kelly, deceased* ["*Kelly Estate*"] (Surrogate's. Court, Suffolk County-Docket #1972P736) were *unlawfully* dissipated to satisfy the *personal* obligations of New York, Suffolk County, Surrogate *Ernest L. Signorelli*, and the *personal* desires of Public Administrator *Anthony Mastroianni*, leaving ***nothing*** for *any* beneficiary, including the prime beneficiaries, the three (3) motherless infants, the children of the predeceased youngest daughter of the testator.

After Signorelli-Mastroianni dissipated *all* the disposable assets in the *Kelly Estate*, leaving *nothing* for *any* beneficiary, the *U.S. Internal Revenue Service* imposed a substantial assessment against *Anthony Mastroianni* "*personally*", for his *personal* failure to make timely payment of the taxes due from the *Kelly Estate,* when the monies in the *Kelly Estate* were available.

Anthony Mastroianni, to satisfy such *personal* obligation to the *U.S. Internal Revenue Service* and other *personal* obligations, *ex parte & sua sponte*, seized the assets in the *Gene Kelly Moving & Storage, Trusts*, ["*Kelly Trusts*"] where the prime beneficiaries were the *same* three (3) motherless infants.

Thus, the three (3) motherless infants, received ***nothing*** from either the *Kelly Estate* or the *Kelly Trusts*!

Today, thirty-five (35) years after *Anthony Mastroianni*, was appointed "*The Temporary Administrator*" of the *Estate of Eugene Paul Kelly, deceased*: (1) there are *none* of mandatory settled accountings; (2) there is *no* valid judgement or final order terminating this judicial trust proceeding; (3) *no* valid order discharging *Anthony Mastroianni* or his surety, *Fidelity & Deposit Company of Maryland* ["F&D"] and (4) *none* of the mandatory *NY Judiciary Law* §35-a Statements.

2. ***All*** the judicial trust assets of *Puccini Clothes, Ltd. – "**The Judicial Fortune Cookie**"*, an involuntarily dissolved N.Y. corporation, were dissipated by *Citibank, N.A.* and its "estate-chasing attorneys", *Kreindler & Relkin. P.C.* as "*bribes*", mostly to judges, leaving ***nothing*** for its nationwide legitimate creditors.

Today, thirty-two (32) years after *Puccini Clothes, Ltd.* was involuntarily dissolved: (1) there are *none* of mandatory accountings by the court-appointed receiver; (2) there are *none* of the mandatory applications by the *New York State Attorney General* ["NYSAG"], the statutory fiduciary, to compel the court-appointed receiver to "account & distribute", [*NY Bus. Corp. Law* §1216]; (3) there is *no* valid judgement or final order terminating this judicial trust proceeding; (4) there is *no* order discharging *Lee Feltman*, the court-appointed receiver, or his surety *F&D* and (5) there are *none* of the mandatory *NY Judiciary Law* §35-a Statements.

3. Since *all* of the monies & assets in the *Kelly Estate* were dissipated to satisfy the *personal* obligations & desires of *Signorelli-Mastroianni* and *all* of assets in *Puccini Clothes, Ltd.* were dissipated, after *laundering*, as "*bribes*", mostly to judges, there are *none* of the mandatory *NY Judiciary Law* 35-a Statements, as confirmed by Exhibit "B", which is a January 30, 2012 Statement from the NY State Office of Court Administration.

"**Mission Impossible**"

2. A portion of one (1) of the fourteen (14) causes of actions, contains the following allegations:

> A. "KREINDLER & RELKIN, P.C., FELTMAN, KARESH, MAJOR & FARBMAN, Esqs., and LEE FELTMAN, Esq. -- `the merchants of corruption' -- who have engaged themselves in the massive larceny and plundering of the judicial trust assets of PUCCINI CLOTHES, LTD., which was involuntarily dissolved on June 4, 1980 -- eight (8) [thirty-two (32)] years ago -- will never be able to render a true accounting for Puccini's assets, as mandated by law, without dramatically exposing their charted course of criminal racketeering, which in addition to larceny and plundering, includes perjury, corruption, extortion, and other crimes, no matter how many judges and officials they compromise and corrupt!...
>
> B. ERNEST L. SIGNORELLI, the Surrogate of Suffolk's County, and his appointee, Public Administrator ANTHONY MASTROIANNI, can never render a true judicial accounting, in a proper judicial proceeding, with respect to the ESTATE OF EUGENE PAUL KELLY, nor justify their barbaric conduct, without dramatically exposing the manner that Signorelli pays some of his personal obligations, no matter how much aid they may improperly receive from Presiding Justice MILTON MOLLEN of the Appellate Division, Second Judicial Department, or His Honor's robed thrall! ...

Plaintiff was and still is the trustee of various trusts of EUGENE PAUL KELLY, who assets were totally seized by Mastroianni, purportedly for the benefit of the Kelly Estate.

Plaintiff was, and claims he still is, the executor of the Kelly Estate, but was unlawfully removed by Signorelli, by retroactive ukase, because, inter alia, plaintiff does not believe that such estates are intended to serve Signorelli's personal interests."

"Judges Without Their Robes"

1. Where "jurisdiction" is absent, the jurist, despite the physical adornment of his/her judicial robe and judicial title, is legally disrobed, is a usurper, a pretender, imposter and impersonator of lawful authority, acting *coram non judice*, rendering the merit dispositions made to be null and void.

2 In *Geo. Sassower v. Mahoney* (#10-2371), the Clerk, *Catherine O'Hagan Wolfe*, stated (Exhibit "A"):

"Appellant ... moves for leave to file an appeal from a district court order denying his motion for, *inter alia*, relief pursuant to Federal Rule of Civil Procedure 60(b)(4)."

In *Bally v. Balicar* (804 F.2d 398 [7th-1986]), the Court set forth the inflexible rule that there is no time limit for a *FRCvP* Rule 60[b](4) and that (at p. 400):

"when the rule 60(b)(4) motion alleges that `the underlying judgment is void because the court lacked personal or subject matter jurisdiction,' once the court decides that the allegations are correct "the ... judge has no discretion and must grant appropriate Rule 60(b) relief."

3. A judge or court does not obtain "jurisdiction" or the "power" to make a lawful decision by refusing to address this essential issue (*Crawford v. United States*, 796 F.2d 924, 928 [7th-1986]).

Part "A":

1. The Federal money damage tort defendants in *Geo. Sassower v. Mahoney* (#88 Civ 563 [NDNY-CGC] [CCA2 #88-6203; #10-2371]) were: *Wilfred Feinberg, Eugene H. Nickerson & William C. Conner*, all Article III jurists from the Second Circuit, and were defended by U.S. Attorney *Frederick J. Scullin, Jr.*, which was & is "*legally impossible*"!

In their "*official capacities*" these federal defendants, since July 4, 1776, could not and still cannot, be "*sued*". They had & still have "*suit immunity*", even when the United States has waived "*sovereign immunity*" (*Perez v. United States*, 218 F. Supp. 571 [SDNY-1963]).

However, in their "*personal capacities*", where they, like anyone else, could & can be "sued", but they could not and still cannot, be defended by a federal attorney, at federal cost & expense!

2. The *unauthorized* defense representation for these three (3) federal judges by U.S. Attorney *Frederick J. Scullin, Jr.*: (I) resulted in a "*subject matter jurisdictional*" lethal infirmity, rendering the merit dispositions made to be "*null & void*"; (ii) were *felonies*, by both provider & recipients, punishable by fines & terms of incarceration.(31 *U.S.C.* §§ 1341, 1342, 1350); (iii) constitutionally compelled a "*public accounting*" for the expenditures made, and (iv) legally obligated "*reimbursement*" in favor of the United States for the *unauthorized* expenditures made for such defense representation.

3. The Complaint in *Geo. Sassower v. Mahoney* (*supra*) was dated May 23, 1988. Two (2) days later, on May 25, 1988, plaintiff preemptively moved for an Order:

"(2) disqualifying the United States Attorney General, any United States Attorney, and/or any member of the Department of Justice, from representing any federal respondents herein;"

The relief requested was not opposed, and despite the dramatic legal consequences, U.S. Attorney *Frederick J. Scullin, Jr.* defended these three (3) federal judges in their "*personal capacities*" confirming that U.S. District Court Judge *Con. G. Cholakis* had been "*fixed*"!

4. Since the defense representations of these three (3) federal judges was *unauthorized*, U.S. Attorney *Frederick J. Scullin, Jr.* had to "*cook*" his official books, as confirmed by a response to a *Freedom of Information Act* request (FOIA #96-2365), which is also a felony (18 *U.S.C.* §1001).

5. *Wilfred Feinberg, Eugene H. Nickerson & William C. Conner* were & are "serial felons" since they have repeatedly been defended in their "*personal capacities*" by federal attorneys, at *unauthorized* federal cost & expense, commencing with *Vilella v. Santagata* (87 Civ 1450 [SDNY-GLG]).

Part "B":

1. The New York State money damage tort defendants, sued in their "*personal capacities*" in *Geo. Sassower v. Mahoney* (*supra*) were: *Francis T. Murphy*; *Milton Mollen*; *Xavier C. Riccobono*; *Alvin F. Klein*; *Ira Gammerman*; *David B. Saxe*, and *Robert Abrams*, and they were all defended by Assistant NYSAG *Lawrence L. Doolittle* from the office of NYSAG *Robert Abrams*, which was "*constitutionally impossible*"!

2. Absent the rare exceptions, here never present, in their "*official capacities*", State judges, officials and/or employees cannot be sued in a federal forum, for money tort damages. In their "*personal capacities*, these NY State defendants could not be defended by a State's attorney, at State cost & expense, as being in violation of Amendment XI of *Constitution of the United States* (*Hans v. Louisiana,* 134 U.S. 1 [1890]).

Since Amendment XI/Hans is a limitation of federal judicial power, a violation results in a "*subject matter jurisdictional*" lethal infirmity rendering the dispositions made to be "*null & void*" (*Pennhurst v. Halderman*, 465 U.S. 89, 121 [1984]).

3. This *unconstitutional* defense representation, which violated the *Constitution of the United States*, also violated Article XIII, §7 of the *New York State Constitution*.

4. Similarly, in order to conceal the *unconstitutional* NY State expenditures, New York State books were "cooked", as confirmed by a response to a *Freedom of Information Law* request (FOIL #03-540).

5. The relief in the aforementioned motion of May 25, 1988, also included the issuance of an Order:

> "(1) disqualifying respondent, ROBERT ABRAMS, Esq., or any member of his office, from representing anyone but ROBERT ABRAMS, Esq., in this proceeding"

Like the motion addressed to the federal attorneys, despite the lethal consequences, it was ignored!

Part "C":

> "the rule .... is inflexible and without exception .... the first and fundamental question is that of jurisdiction, first, of [the appellate] court, and then of the court from which the record comes. This question the court is bound to ask and answer for itself, even when not otherwise suggested, and without respect to the relation of the parties to it." (*Mansfield v. Swan,* 111 U.S. 379, 382 [1884]).

1. The "inflexible and without exception" principle *means* that even the party that caused the jurisdictional infirmity to exist is not estopped from asserting the infirmity after an unsatisfactory result.

Thus, in the two hundred (200) old *Capron v. Van Noorden* (6 U.S. 126 [1804]), the Court stated:

> "The *only* question submitted to the court was, whether the plaintiff could assign as error *his own* [jurisdictional] omissions and irregularities in the pleadings." [emphasis supplied]

The Court responded in the affirmative, and reversed the judgment.

2. Where the U.S. District Court does not have "jurisdiction", the *only* disposition that can be made by an appellate tribunal was set forth in *U.S. v. Corrick* (298 U.S. 435 [1936]):

> "The appellants did not raise the question of jurisdiction at the hearing below. But the lack of jurisdiction of a federal court touching the subject matter of the litigation cannot be waived by the parties, and the district court should, therefore, have declined *sua sponte* to proceed in the cause. And if the record discloses that the lower court was without jurisdiction this court will notice the defect, although the parties make no contention concerning it. While the District Court lacked jurisdiction, we have jurisdiction on appeal, not of the merits but merely for the purpose of correcting the error of the lower court in entertaining the suit."

3. In ignoring this "*inflexible without exception*" federal appellate principle, Chief U.S. Circuit Court Judge *Jon O. Newman* rendered probably the most dangerous decision ever rendered in Anglo-American judicial history, which had & still has dramatic consequences (CCA 2nd -#90-6203).

"**The Degenerates**"

1. At all times, under every circumstance, in all Federal courts, the Federal & New York State attorneys representing the aforementioned money damage tort defendants, acted *adversely* to legitimate United States & New York State interests, financially & otherwise.

The legitimate interests of the NYSAG are: (a) the three (3) motherless infants in the *Kelly Estate/Trusts* wherein the NYSAG on behalf of the State of New York he is the *parens patriae* ; and (b) he is the statutory fiduciary for all NY State involuntarily dissolved corporations such as *Puccini Clothes, Ltd.*

No American attorney can conduct himself *adversely* to the legitimate interests of his client or trust and no American jurist, trial or appellate, as a *sua sponte* obligation can tolerate such perfidious behavior (*Wood v. Georgia*, 450 U.S. 261, 265 fn. 5 [1981]).

2. Thus, as set forth in plaintiff's motion for "leave to appeal", dated July 23, 2010:

> " 2. The *only `bribes'* by and/or behalf of *Citibank, N.A.* that are here targeted, although *only* a fraction of its total *bribes,* are the more than $3,500,000 from *`sources'* where: (1) *`public accountings'* are *mandatory,* and (2) affirmant has *`standing'* to *`sue & recover'*.
>
> Thus, for example, *all* monies payable `to the [federal] court', which included affirmant's monies, pursuant to the Order by U.S. District Court Judge *Eugene H. Nickerson* (*Raffe v. Citibank*, 84Civ0305 [EDNY-EHN]) were *`diverted'* to the coffers of *Citibank, N.A.* and its `estate chasing' attorneys, *Kreindler & Relkin, P.C.* [*`K&R'*], and `the federal court' and/or the *`United States'*, received *none* of these federal monies. Thus, to have these *`diverted'* federal monies recaptured from *Citibank-K&R* in favor of the United petitioner needs permission!
>
> Where federal monies are involved, such as the *`diverted'* federal monies, a *`public accounting'* is mandatory, which cannot be waived, excused or enjoined by any branch of the United States government, or by any judge or official (Article 1 §917] of the *Constitution of the United States*).
>
> Obviously, for *Citibank-K&R* and/or those judges that they *`bribed'* with their illicit federal *`loot'*, affirmant must be denied `access' to the courts for them to retain their booty!
>
> 3. The *only `expenditures'* that are here targeted are those where: (1) where *`public accountings'* are mandatory; (2) result in *`subject matter jurisdictional'* infirmities and (3) where affirmant has *`standing'* to cause *`reimbursement'* to be made.

Obviously, here also, to prevent *`reimbursement'* to the United States and State of New York, affirmant must be denied `access' to the courts for these Federal & NY State judges to continue their financial frauds upon United States and State of New York.

All federal money damage tort actions revolving around *`The Citibank Bribes for Total Immunity Enterprise'* [*`The Enterprise'*], is infected with *`subject matter jurisdictional'* and other lethal infirmities, which rendered the merit dispositions made to be *`null & void'*!

These federal jurists must all abdicate their *sua sponte* obligation to inquire into these infirmities and must be deprived affirmant `access' to the courts for that purpose for *`The Enterprise'* to continue to be operational."

3. Independent of other infirmities, the proceedings are "*null & void*" (*U.S. v, Throckmorton*, 98 U.S. 61 [1878]).

"Transparently Invalid"

> "when a court is so obviously traveling outside its orbit as to be merely usurping judicial forms and facilities, ... an order issued by a court [may] be disobeyed and treated as though it were a letter to a newspaper." Associate Justice *Felix Frankfurter*, concurring in *United States v. United Mine Workers* (330 U.S. 258; 309-310 [1947]):

1. There are several "*bribe*" agreements by *Citibank, N.A.* revolving around its engineered larceny of the judicial trust assets of *Puccini Clothes, Ltd.*, one of which was the "***The Citibank Bribes for Total Immunity Agreement***" ["***The Agreement***"].

"*The Agreement*" provided that for "*bribe*" payments of $5,000,000, *Citibank, N.A.* and its entourage would receive total civil, criminal & disciplinary immunity.

The "*bribe*" payment of $4,200,000 from the assets of *Citibank, N.A.* was expressly conditioned on the transmission of the remaining judicial trust cash assets in *Puccini Clothes, Ltd.*, in the approximate sum of $800,000, as "*bribes*" for judges.

Since I & my client, *Hyman Raffe*, had contractually based, constitutionally protected, liquid assets in *Puccini Clothes, Ltd.*, exceeding $800,000 which could not be "*impaired*" by any State or Federal judge, official or employee (Article 1 §10[1] & Amendment V of the *Constitution of the United States*), nothing remained as "*bribes*" for judges.

To *"preserve"* the remaining cash assets in *Puccini Clothes, Ltd.* as "*bribes*" for judges and to "*provide*" *Citibank, N.A.* and its entourage with "immunity", U.S. District Court Judge *William C. Conner* & NY Supreme Court Judge *Ira Gammerman* both, without jurisdiction issued their "*transparently invalid*" injunctions (*Raffe v. Doe*, 619 F. Supp. 891 [SDNY-1985]; *Geo. Sassower v. Sheriff of Westchester County*, 651 F. Supp. 128, 131 [SDNY-1986]).

Although there are no reported cases where the injunctions issued are more "*transparently invalid*" than the *Conner-Gammerman* injunctions (see, *e.g.*, *In re Providence Journal*, 820 F.2d 1342, 1354 [1st Cir.-1987]). and although, on their face" the *Conner-Gammerman* decisions lack "jurisdiction", with $5,000,000 in "*bribes*" at stake, no judge has been willing to declare either of them, invalid.

Because *Conner-Gammerman* decisions, as they knew, lacked "jurisdiction" and because they are completely "out of orbit', they were made money damage tort defendants in *Geo. Sassower v. Mahoney* (*supra*).

Raffe v. Doe (*supra*) was the first "hard print publication" of "***The Citibank Bribes for Total Immunity Enterprise***" ["***The Enterprise***"] and upon publication it was correctly stated that the "*black robe*" replaced the "*gun*" as the weapon of choice!.

2. The contractually based, constitutionally protected assets of plaintiff, *Geo. Sassower*, as set forth in the Complaint in *Geo. Sassower v. Mahoney* (*supra*) were & are:

> " a. A wholly unsatisfied judgment against Puccini in the sum of $27,912.42, with interest from April 29, 1982. ...
>
> c. An attorney's lien on the 25% stock interests of HYMAN RAFFE ["Raffe"] in Puccini.
>
> d. An attorney's lien on a judgment in favor of Raffe against Puccini in the approximate sum of more than $500,000, inclusive of interest.
>
> e. An attorney's lien on a claim in favor of Raffe against Puccini in the approximate sum of almost $40,000, inclusive of interest.
>
> f. A legal and/or equitable lien on the stock interests in Puccini by EUGENE DANN ["Dann"] and ROBERT SORRENTINO ["Sorrentino"], by reason of (1) the aforementioned judgment of $27,912.42, which includes Dann and Sorrentino, as judgment debtors, and (2) attorney's liens by virtue of various judgments and claims against them by Raffe."

3. Since no jurist has ever been willing to interfere with the "*bribe*" payments by *Citibank, N.A.*, in the millions of dollars to judges by declaring the *Conner-Gammerman* and similar injunctions invalid, and although plaintiff's assets were very much greater than his liabilities, he filed petitions in bankruptcy.

These petitions vested the assets of *Geo. Sassower* in the U.S. District Court (28 *U.S.C.* §1334) and stayed all pre-petition injunctions (11 *U.S.C.* §362).

The complaint in *Geo. Sassower v. Mahoney* (*supra*) opens as follows:

> "Petitioner, individually, and as a Chapter 13 debtor, with trust powers, as and for his complaint, respectfully sets forth and alleges:
>
> 1. On December 23, 1987, petitioner commenced a case by filing a voluntary petition for relief under Chapter 13 of Title 11, United States Code ("case filing"), and brings this proceeding pursuant to 28 U.S.C. §1343, §1334,§1408, 18 U.S.C. §1961 et. seq.; 42 U.S.C. §1983, and rights which arise directly from the U.S. Constitution."

"**Ipse Dixit**"

1. The patently "*fixed*" U.S. District Court Judge *Con. G. Cholakis*, ignored all lethal infirmities, jurisdictional & otherwise, and dismissed all fourteen (14) causes of action in the complaint, in an opinion that defies comprehension.

2. However, no one has ever denied the disposition made was & is "*null & void*"!

Respectfully,

GEORGE SASSOWER

GEORGE SASSOWER, Esq., an attorney, affirms the aforementioned to be true under penalty of perjury.

Dated: April 30, 2012

GEORGE SASSOWER

To: Catherine O'Hagan Wolfe, Esq.