

GEORGE SASSOWER

ATTORNEY AT LAW
51 DAVIS AVENUE
WHITE PLAINS, N. Y. 10605

914-949-2169

June 15, 1987

Hon. Edwin Meese, III
Attorney General of the United States
10th Street & Constitution Avenue, NW
Washington, D.C., 20530

Re: U.S. Attorney, Rudolph W. Giuliani
U.S. Attorney, Andrew J. Maloney
Ass't U.S. Atty, Robert W. Gaffey

Honorable Sir:

In accordance with the provisions of Title 28, Chapter 40 (§591 et seq.), an investigation and inquiry of the activities of the above is hereby requested, and remedial action taken, including the appointment of an independent counsel.

Related to this application, will be information and complaints, hereinafter made by separate application, about criminal activities of various members of the federal judiciary, who the above are attempting to conceal.

1a. Eons ago, by several writings, Hon. Rudolph W. Giuliani, was advised, with specifics, of a criminally corrupt situation that existed in the state and federal judicial and governmental systems in this area.

b. Thereafter, in writting, Hon. Andrew J. Maloney, was similarly advised of the situation, insofar as his bailiwick was concerned.

c. Each of them should have promptly acknowledged the communications, recognized that conflicting obligations and the appearance of justice required investigation and prosecution by members of your department not assigned to this area.

d. Instead, because of the identities of some of those involved, they both intentionally ignored these communications and other evidence of criminal corruption, and as a result thereof the matter has metastasized to vertiginous proportions.

e. Indeed, overt acts have taken place by the U.S. Attorneys' Offices to obstruct the operation of the criminal justice system in this matter.

f. In the history of the anglo-american judiciary, I know of no situation wherein corruption now involves so many judges and governmental officials, state and federal, and consequently only a bare outline can reasonably be set forth herein.

Information and/or particularization on any areas found to be necessary or helpful will be promptly furnished upon request.

2. The underlying facts, insofar as PUCCHINI CLOTHES, LTD. ["Puccini"] is concerned, is briefly as follows:

a. Puccini, a solvent corporation, was involuntarily dissolved, by Order of the Supreme Court, New York County, on June 4, 1980 -- more than seven (7) years ago -- its assets and affairs becoming custodia legis under color of law.

b. Albeit its dissolved status, Puccini remained a "person" within the meaning of the XIV Amendment of the Constitution of the United States.

c. From the very outset, on June 4, 1980, Puccini's judicial trust assets became the subject of massive larceny, engineered by the firm of KREINDLER & RELKIN, P.C. ["K&R"], and its clients, JEROME H. BARR, Esq. ["Barr"], and CITIBANK, N.A. ["Citibank"].

Most of these judicial trust assets were used by K&R and its clients to corrupt others.

d. To conceal such larceny of judicial trust assets, K&R and its clients, inundated the judicial forum with perjurious statements emphatically denying the accusations made.

e. Such emphatic denials, aided, abetted, and facilitated by others, enabled K&R and its clients, by such fraud, to criminally come into possession of further substantial funds from my client, HYMAN RAFFE ["Raffe"].

f. The lay others in this criminal conspiracy, included LEE FELTMAN, Esq. ["Feltman"]; FELTMAN, KARESH, MAJOR & FARBMAN, Esqs. ["FKM&F"]; NACHAMIE, KIRSCHNER, LEVINE, SPIZZ & GOLDBERG, P.C. ["NKLS&G"]; and RASHBA & POKART ["R&P"].

g. On November 7, 1983, three and one-half (3 1/2) years after Puccini was involuntarily dissolved, the first hard evidence of such massive larceny surfaced, and in the months that followed, the evidence of such criminal conduct simply cascaded.

h. An unintended result of such disclosures of larceny was the involvement of members of the judiciary and other governmental officials.

i. An obvious, but important, incident to such larceny, and well as other misconduct hereinafter set forth, is the manifest evasion of the United States Revenue laws, and the diversion of funds due to the United States Government, to private pockets.

3a. In order to conceal the aforementioned larceny of judicial trust and other assets, the manifest perjury, and the official and judicial corruption involved, a massive campaign of judicial and official terrorism was implemented which is fully documented.

b. The objects of such criminal terrorism was (1) Puccini, the helpless judicial trust; (2) Raffe, a 25% stockholder of Puccini, and a substantial judgment creditor; (3) SAM POLUR, Esq. ["Polur"]; and (4) myself.

c. It is the identities of the involved judicial and official criminal culprits which explains the misconduct of the above U.S. Attorneys.

4. THE STATUTORY AND JUDICIAL SCHEME:

a. The assets and affairs of these helpless constitutional "persons", such as Puccini, from third persons are supposedly protected by receivers appointed by the court, as agents of the court (Kaplan v. 2108, 74 A.D.2d 786, 425 N.Y.S.2d 817, 818 [1st Dept.]; Ripple's v. LeHavre, 88 A.D.2d 120, 122, 452 N.Y.S.2d 447, 449 [2d Dept.]; Schwartzberg v. Whalen, 97 A.D.2d 974, 466 N.Y.S.2d 846, 847 [4th Dept.]; Jamaica v. Florizal (95 Misc.2d 654, 407 N.Y.S.2d 1016 [Sup. Queens]), who act under color of law.

b. Obviously, those appointed for these "plum" positions, are generally those with judicial and politican associations.

c. Consequently, the assets of these helpless constitutional "persons" are supposedly protected by the State Attorney General (see e.g. Business Corporation Law §§1214, 1216).

d. While those interested in the assets and affairs of the involuntarily dissolved corporations have legal rights, as against a court-appointed receiver, these rights, in the judicial arena, are more theoretical than real.

e. By statute, the receiver must serve and file a list of all "assets" of the involuntarily dissolved corporation each year (Business Corp. Law §1207[A][3]), render a final accounting generally within the year (Bus. Corp. Law §1216[a]), and "each and every year" (22 NYCRR §202.52[e], 202.53).

f. To insure that there is no collusion between the receiver and the courts, the Attorney General, as a matter of ministerial "duty", permitting no discretion whatsoever, is mandated to make application for a final accounting after the expiration of eighteen (18) months (Bus. Corp. Law, §1216[a]).

g. In Supreme Court, New York County, with Administrative Judge, Xavier C. Riccobono at the helm, and with Presiding Judge, Francis T. Murphy in charge of the Appellate Division, there is a collusive arrangement with the Attorney General, Hon. Robert Abrmas, wherein the Attorney General never involves himself to protect these helpless constitutional "persons" from the insatiable monetary appetites of some of these court appointed receivers, except to protect monies directly due to the state, and no more.

h. Judicial trusts, these constitutional "persons", are simply "judicial fortune cookies", receiving no protections whatsoever, and woe to those who attempt to see that such constitutional "persons" receive legal protection.

i. In short, the assets of these helpless constitutional "persons", as in the Puccini matter, are diverted for corrupt and larcenous purposes.

5. PUCCHINI CLOTHES, LTD.

a. Puccini, as heretofore noted, was involuntarily dissolved more than eighty-four (84) months ago, and the massive larceny of judicial trust assets, in addition to the plundering, simply cannot be concealed in any sworn statement of assets or in any accounting, final or otherwise.

b. Consequently despite statutory and rule mandates, no statements of assets has ever been filed, nor has there been any filed accounting.

c. A singular attempt was made in September 1986, when legal notices were published in the New York Times (Exhibit "A") and New York Law Journal (Exhibit "B"), for such purported "final accounting", supposedly to be settled in the non-public courtroom of Referee Donald Diamond.

d. Such purported "final accounting" (Exhibit "C") only lists "income" (Exhibit "C-1") and "expenses" (Exhibit "C-2"), and is a transparent fraud.

e. There is no statement of, inter alia, Puccini's judicial trust assets as of June 4, 1980, or of the whereabouts of those assets at the present time.

f. Those assets, and their disposition, served as the lubricant for judicial and official corruption.

g. Comparatively recently, there surfaced from the non-public courtroom of Referee Donald Diamond, a Feltman affidavit, verified on March 5, 1986, a time when the "thieves" had a temporary falling out, which reads as follows:

"[T]hey [Kreindler & Relkin, P.C.] have substantially delayed the dissolution proceeding by impeding discovery sought by the Receiver concerning (i) the amounts that the Kaufman Estate received from Puccini after the Dissolution Order was issued enjoining such payments, and (ii) the books and records of Puccini that appear to be missing. For example, the Kaufman Estate refused to comply with a Subpoena Duces Tecum for eighteen months and remains in default in providing certain discovery despite judicial directives. Moreover, in an effort to block a lawsuit by me as Receiver against the Kaufman Estate to recover for the insolvent Puccini Estate the payments received and retained by the Kaufman Estate in violation of the Dissolution Order in this proceeding, they have adopted the position that my law firm has a conflict of interest and I should retain another firm to prosecute such suit, threatening to delay such required lawsuit by a disqualification motion [emphasis in original].".

6. THE WOMB OF JUDICIAL CORRUPTION:

a. The womb of judicial corruption in the fiefdoms of Administrative Judge, Xavier C. Riccobono and Presiding Judge, Francis T. Mmurphy has been a corrupt arrangement with the Attorney General of the State of New York, Hon. Robert Abrams, wherein the Attorney General has abdicated all statutory and ethical responsibilities, including those of a ministerial mandatory nature.

b. In this area, those statutory trust responsibilities are under the immediate stewardship of Senior Attorney, David S. Cook, Esq. ["Cook"], or his alter ego, Assistant Attorney General Jeffrey I. Slonim, Esq. ["Slonim"].

c. The corruption in the office of U.S. Attorney, Rudolph W. Giuliani, at least in the Puccini matter, mirrors the corrupt practices in the state attorney generals office, and consequently is made subject of further detailed examination herein.

d. Business Corporation Law §1216 provides:

"Final accounting; notice: duty of attorney-general (a) Withing one year after qualifying, the receiver shall apply to the court for a final settlement of his accounts and for an order for distribution, or, upon notice to the attorney-general, for an extension of time, setting for the reasons therefore. If the receiver has not so applied for a settlement of his accounts or for such extension of time, the attorney-general or any creditor or shareholder may apply for an order that the receiver show cause why an accounting and distribution should not be had, and after the expiration of eighteen months from the time the receiver qualified, it shall be the duty of the attorney-general to apply for such order on notice to the receiver. "

e. 22 NYCRR §202.52[e], §202.53, provides:

"Deposit of funds by receivers and assignees". "Receivers shall file with the court an accounting at least once each year. ... Trust accountings; procedure (a) Applications by trustees for interlocutory or final judgments or final orders in trust accountings or to terminate trusts shall be by notice of petition or order to show cause after the account has been filed in the county clerk's office."

f. Business Corp. Law §1207 (a)(C)(3) states that the receiver shall:

"On or before the first day of February in each year, for the preceding calendar year, and at such other times as the court shall direct, the receiver shall file with the clerk of the court by which he was appointed a verified statement showing the assets received, the disposition thereof, the money on hand, all payments made, specifying the persons to whom paid and the purpose of the payments, the amount necessary to be retained to meet necessary expenses and claims against the receiver, and the distributive share in the remainder of each person interested therein. A copy of such statement shall be served by the receiver upon the attorney-general within five days after the filing thereof.

g. There are no compelled applications for the filing of accountings by the state Attorney General, or the filing of assets, albeit ministerially mandated by Hon. Robert Abrams, or any other actions on behalf of the involuntarily dissolved corporations, or those interested in its assets or affairs, in the Puccini matter, simply because the state Attorney General, like the U.S. Attorney represents the judiciary, corrupt or otherwise, as well.

7. THE CORRUPT JURIST:

a. The corrupt jurist, in trust or estate matters, generally operates in tandem with a corrupt receiver or executor.

b. The corrupt receiver, the agent of the court, serves his own interests, rather than that of his assigned estate, the notable Cardozian decisions on the subject notwithstanding (Meinhard v. Salmon, 249 N.Y. 458; Beatty v. Guggenheim, 225 N.Y. 380; Wendt v. Fisher, 243 N.Y. 439).

c. The corrupt jurist, knowingly permits a receiver and his attorneys to act contrary to the interests of their helpless judicial estate, the administrative obligations of the jurist and/or the court notwithstanding (Strickland v. Washington, 466 U.S. 668; Culyer v. Sullivan, 446 U.S. 335; Powell v. Alabama, 287 U.S. 45; Eagle v. Isaac, 456 U.S. 107; Gideon v. Wainwright, 372 U.S. 335; Betts v. Brady, 316 U.S. 455;

Johnson v. Zerbst, 304 U.S. 458; Trapnell v. U.S., 725 F.2d 149 [2d Cir.]; United States v. Wight, 176 F.2d 376 [2d Cir.]; Diggs v. Welch, 148 F.2d 667 [D.C. Cir.]; People v. Baldi, 54 N.Y.2d 137, 444 N.Y.S.2d 893; Matter of Bruce B., 111 A.D.2d 754, 490 N.Y.S.2d 246 [2d Dept.]).

d. Indeed, the entire judicial process becomes a "fraud", a "farce", and a "mockery of justice", as these helpless constitutional "persons" (Evitts v. Lucey, 469 U.S. 387; Anders v. California, 386 U.S. 738; Gideon v. Wainwright, 372 U.S. 335; Powell v. Alabama, 287 U.S. 45; Johnson v. Zerbst, supra.), are raped and plundered.

8. PUCCINI -- "THE JUDICIAL FORTUNE COOKIE"

a. The consistent course of conduct of Feltman and his law firm, FKM&F, is overtly contrary to the interests of Puccini, the helpless judicial ward, whose assets and affairs are held under color of law.

b. The disclosures made on November 7, 1983, and shortly thereafter, revealed not only a massive larceny of the judicial trust assets engineered by K&R, and its clients, but also that it was aided, abetted, and facilitated by Feltman and FKM&F, acting on behalf of the court, with active and corrupt judicial involvement.

c. I thereupon wrote to Hon. Robert Abrams, Puccini's statutory trustee, as was my constitutional right (U.S. Constitution, Amendment 1; California Motor v. Trucking Unlimited, 404 U.S. 508, 513; N.Y.S. Constitution, Article 1 §9) and professional obligation (Code of Professional Ethics, 1-103), and it was Cook who responded.

d. It was to Cook that I gave essentially all my information about such criminal and ethical misconduct, including by members of the judiciary.

e. Additionally, on behalf of my client, Raffe, and Puccini, action was taken in state and federal courts to recover those assets which had been wrongfully and unlawfully taken from it.

f. Intent on preventing restitution to Puccini, FKM&F, ex parte consulted Administrative Judge Xavier C. Riccobono, one of the corrupt jurists in the stable of jurists, officials, and politicians, controlled by FKM&F and K&R.

g. This ex parte corrupt transaction, led to the ex parte administrative appointment of the corrupt, Referee Donald Diamond.

h. The general scheme was, inter alia, to stonewall restitution to Puccini.

i. It takes a vivid imagination to conceive that those responsible for vouchsafing the assets and affairs of Puccini, would by a corrupt and depraved arrangement attempt to prevent restitution to their judicial trust.

j. When Referee Donald Diamond, by his "situation rules", failed to completely halt Raffe nor myself in obtaining restitution, the services of others, including Mr. Justice Ira Gammerman was enlisted.

k. In each case, in state and federal court, representing the state judiciary, while pretending to simultaneously vouchsafe the interests of Puccini, was Cook, except when Cook was a named party defendant and/or respondent, when such titular representation was by Slonim.

l. Thus, for example, in an action by Puccini against the corrupt, Mr. Justice David B. Saxe ["Saxe"], to recover monies paid out by His Honor in violation of a non-discretionary prohibitive directive, it was Cook who represented Saxe opposing recovery, while simultaneously serving as Puccini's statutory watchdog.

Obviously, in this dual representation, Cook carries with him the confidential information given him by myself and others on behalf of involuntarily dissolved corporations.

It is Cook, who despite his ministerial statutory "duty", who opposes applications for an accounting!

m. A similar scenario is followed in the U.S. Attorneys' Offices, when U.S. Attorney Rudolph W. Giuliani, not only represents corrupt members of the federal judiciary in civil litigation, but also, assigning the same Assistant U.S. Attorney, has that assistant U.S. attorney attempt to stonewall access to the federal grand jury!

9. THE PARADE OF HORRIBLES

a. There are several standard ways that a corrupt judiciary can prevent a litigant's constitutional right to access to the courts for relief, all of which are patently unconstitutional.

b. The state and federal judiciary have, in the Puccini litigation, employed them all, including the most draconian, and even employed methods beyond their judicial power.

c. In the Puccini litigation, there are members of the judiciary, aided and abetted, by the above U.S. Attorneys and other criminal prosecutorial officials, including the State Attorney General, who are nothing better than base criminal racketeers.

d. Initially, Referee Donald Diamond, would simply terminate motions brought for relief, including that due to Puccini, the helpless judicial trust, by ex post facto, "ever changing, situation rules" or by corrupting other jurists in that court.

e. Thereafter, this corrupt appointee of Administrative Judge, Xavier C. Riccobono, began to impose fines, of herculian proportions, albeit beyond his jurisdictional power or authority.

Thus, for example, when I simply requested permission to make a motion to increase Puccini's assets by a minimum of \$300,000 within 45 days, without risk or cost, Referee Donald Diamond, not only denied such permission, but imposed fines against me of more than \$196,000 for making the request.

For consenting to such application, Raffaele, was fined more than \$200,000.

No rational person would go into court requesting the even the most compelling relief, when such type of penalties are imposed, as the courts have repeatedly observed (see Cotting v. Goddard, 183 U.S. 79, 99-102).

f. It is blackletter law, that for any crime protected by the V, VI, and/or XIV Amendments, which includes, non-summary criminal contempt, absent a plea of guilty, as a matter of ministerial compulsion, a trial must be afforded before one is convicted (Nye v. United States, 313 U.S. 33; Ex parte Robinson, 19 Wall [86 U.S.] 505; Bloom v. Illinois, 391 U.S. 194).

Nevertheless, in the corrupt courts controlled by Chief Judge, Wilfred Feinberg; Presiding Justice, Francis T. Murphy; and Administrative Judge, Xavier C. Riccobono, one can be criminally convicted, without a trial, and then such conviction is employed as a predicate for disbarment, all in a criminal attempt to extort a code of silence with respect to their criminal corruption, and that of their courts.

g. Furthermore, this depraved criminal racketeering scheme, aided by those in black robes, is employed to divert funds due to government, including the United States Government, to their lay co-conspirators, all with the knowledge of the aforementioned U.S. Attorneys.

h. Fines and penalties, imposed for criminal contempt, are clearly payable to the sovereign. Nevertheless, in the bailiwick of U.S. Attorneys Giuliani and Maloney, as they actually know, such fines and penalties find themselves in the pockets of K&R and FKM&F, "the criminals with law degrees", and such penalties, state and federal, are used to criminally extort and blackmail.

10. CRIMINAL EXTORTION AND BLACKMAIL:

a. When about every attempt was made, and failed, to compel Raffe, Polur, and myself to succumb to the criminal desires of K&R, FKM&F, and their stable of corrupt judges, officials, and politicians, they resorted to outright criminal extortion and blackmail.

b. With K&R and FKM&F openly boasting that they controlled the actions of the judiciary, state and federal, nisi prius and appellate, it was manifestly obvious that District Judge Eugene H. Nickerson ["Nickerson"], was one of the judges who they could completely manipulate and control, and they so stated.

c. On the state side, it was obvious that Mr. Justice Alvin F. Klein ["Klein"] and Mr. Justice David B. Saxe ["Saxe"], were in the FKM&F and K&R stable of controllable corrupt judges.

d. Despite it being beyond the jurisdictional and constitutional power of any judge or court, federal or state, to convict anyone of non-summary criminal contempt, without a trial, absent a plea of guilty, that is precisely what was done by the aforementioned, in order to advance this criminal misadventure by K&R, its clients, and FKM&F (cf. Young v. U.S. ex rel. Vuitton, 55 USLW 4676).

e. The Klein and Nickerson convictions, as well as the Reports of Referee Donald Diamond (see Sassower v. Sheriff (651 F. Supp. 128 [SDNY])) clearly demonstrate criminal extortion and blackmail.

f. Klein, a corrupt state jurist, by one Order convicted and sentenced Raffe, Polur, and myself to each spend thirty (30) days of incarceration for non-summary criminal contempt, without affording any of us a trial, although His Honor knew that he had no jurisdictional authority for such action.

It is also clear that had any one of us been afforded a trial, no conviction was possible.

Raffe succumbed, paid FKM&F hundreds of thousands of dollars, executed releases in favor of FKM&F, K&R, Administrative Judge Xavier C. Riccobono, Referee Donald Diamond, Mr. Justice Ira Gammerman, Mr. Justice Alvin F. Klein, and he was never incarcerated.

Such considerations, paid to compound criminal contempt, belong to the sovereign.

Polur, served his full term, but when he left the scene, the disciplinary proceeding against him based on such sham conviction was terminated.

I refused to negotiate with these "criminals with law degrees", refused to adopt a code of silence with respect to their corrupt activities, and based on such unconstitutional convictions was disbarred (Grievance Committee v. G. Sassower (125 A.D.2d 52, 512 N.Y.S.2d 203 [2d Dept.])).

g. Referee Donald Diamond issued two mirrored Reports recommending fines and incarceration for Raffe and myself. When Raffe succumbed and executed releases to members of the judiciary, including Referee Donald Diamond, paid hundreds of thousands of dollars, and agreed to remain silent about criminal corruption, the Diamond Report was never brought on for confirmation.

I refused to deal with these "peddlers of corruption", and was incarcerated until such trial-less conviction was declared unconstitutional (Sassower v. Sheriff (651 F. Supp. 128 [SDNY])).

I really do not care if I am incarcerated by such unconstitutional trial-less convictions one hundred (100) times, I simply will not deal with these "judicial thieves" and their stable of corrupt judges.

I am "untouchable"!

h. Judge Eugene H. Nickerson, a patently corrupt federal jurist, also without a trial, and even without a criminal accusation, convicted Raffae and myself for non-summary criminal contempt, which was also employed as a predicate for my disbarment.

i. These manifestly unconstitutional convictions were affirmed on appeal, and together with other evidence revealed that Chief Judge, Wilfred Feinberg, Circuit Judge, Irving R. Kaufman, and Circuit Judge, Thomas J. Meskill, were criminally cooperating in this corrupt scenario.

These matters, including the existence of corrupt jurists in the federal judiciary, will be dealt with in separate complaints for investigation.

11. CRIMINAL CORRUPTION BY THE U.S. ATTORNEYS:

a. Upon receipt of information involving corruption in the judicial process, including the larceny of judicial trust assets held under color of law, and diversion of funds from the United States Government, inquiry and investigation was mandated.

b. Instead, the aforementioned assigned Assistant U.S. Attorney Robert W. Gaffey, to handle the civil defense of corrupt federal jurists, and to otherwise work in tandem with "the criminals with law degrees".

c. Mr. Gaffey, thereupon, began to obstruct my access to the federal grand jury (see In re Grand Jury Application, 617 F. Supp. 199 [SDNY]) by a series of corrupt ex parte maneuvers.

d. It is one thing for Mr. Gaffey to defend the civil actions against federal judicial clients, it is however manifestly improper as part of such civil defense, to prevent a criminal investigation of his clients, including an inquiry by the Grand Jury.

Hon. Edwin Meese, III

-14-

Jun 15, 1987

e. I suggest that a simply inquiry of the above U.S. Attorneys as to the disposition of the information concerning judicial and official corruption in this area will immediately reveal their misconduct.

f. I further suggest that any inquiry into the disposition of the judicial trust assets of Puccini will also immediately reveal a criminally corrupt situation.

g. Unquestionably, the above U.S. Attorneys cannot defend in related civil proceedings, when their clients are accused of criminal action, and those accusations have substnatial support.

Respectfully,



GEORGE SASSOWER

cc: U.S. Attorney Rudolph W. Giuliani
U.S. Attorney Andrew J. Maloney.



The New York Times

229 WEST 43 STREET, NEW YORK, N.Y. 10036

CERTIFICATION OF PUBLICATION

OCTOBER 21 1986

I, ELAINE MOORE, in my capacity as a Principal of the Publisher of The New York Times a daily newspaper of general circulation printed and published in the City, County and State of New York, hereby certify that the advertisement annexed hereto was published in the editions of The New York Times on the following date or dates to wit on

September 22 1986 Elaine Moore

Approved: Sheldon Polshock

Exhibit "A"

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

In the Matter of the Application of Jerome H. Barr and Citibank, N.A., as Executors of the Will of Milton Kaufman, Holders of One Quarter of All Outstanding Shares of Puccini Clothes, Ltd. Entitled to Vote in an Election of Directors For the Dissolution of Puccini Clothes, Ltd.

Index No. 01816/80 NOTICE OF INTENT BY RECEIVER TO FILE ACCOUNTS FOR FINAL SETTLEMENT

And ALL OTHER ACTIONS AND PROCEEDINGS IN ANY COURT CONCERNING OR RELATING TO PUCCINI CLOTHES, LTD., ITS RECEIVER OR SHAREHOLDERS OR THEIR ATTORNEYS.

NOTICE is hereby given by the undersigned as Receiver of Puccini Clothes, Ltd. that an account of his proceedings as Receiver of the above named corporation, under oath, will be presented to the Supreme Court of New York, County of New York, before the Honorable Don Diamond, Special Referee, at Room 538 of the Courthouse, 60 Cent Street, New York, New York, on October 30, 1986, at 10:00 o'clock in the forenoon of that day or as soon thereafter as counsel can be heard, and an application will then and there be made returnable that the same be allowed and be decreed to be final and conclusive upon all persons, including those indebted to said corporation, all persons having in their possession any property of said corporation, all persons with whom said corporation has unfulfilled contracts and upon all creditors, claimants and shareholders of the corporation, and that said Receiver be authorized to make a final distribution, and upon the payment thereof, that he be discharged and his term vacated, and for such other, further and/or different relief as the Court may deem just and proper.

LEE FELTMAN, ESQ., as Receiver for Puccini Clothes, Ltd.

STATE OF NEW YORK,

County of New York, }

ss:

SUPREME COURT OF THE STATE OF NEW YORK - COUNTY OF NEW YORK - Index No. 01814 80 - NOTICE OF INTENTION BY RECEIVER TO FILE ACCOUNTS FOR FINAL SETTLEMENT - In the Matter of the Application of Jerome H. Barr and Citibank, N.A. as Executors of the Will of Milton Kaufman, Holders of One Quarter of All Outstanding Shares of Puccini Clothes, Ltd. Entitled to Vote in an Election of Directors For the Dissolution of Puccini Clothes, Ltd. and ALL OTHER ACTIONS AND PROCEEDINGS IN ANY COURT CONCERNING OR RELATING TO PUCCINI CLOTHES, LTD. ITS RECEIVER OR SHAREHOLDERS OR THEIR ATTORNEYS.

NOTICE is hereby given by the undersigned as Receiver of Puccini Clothes, Ltd. that an account of his proceedings as Receiver of the above named corporation, under oath will be presented to the Supreme Court of the State of New York, County of New York, before the Honorable Donald Diamond, Special Referee, at Room 538 of the Courthouse, 60 Centre Street, New York, New York, on October 30, 1986 at 10:00 o'clock in the forenoon of that day or as soon thereafter as counsel can be heard, and an application will then and there be made returnable that the same be allowed and be decreed to be final and conclusive upon all persons including those indebted to said corporation, all persons having in their possession any property of said corporation, all persons with whom said corporation has unfulfilled contracts and upon all creditors, claimants and shareholders of the corporation, and that said Receiver be authorized to make a final distribution, and upon the payment thereof, that he be discharged and his bond vacated, and for such other, further and/or different relief as to the Court may seem just and proper. Dated New York, New York September 10, 1986

LEE FELTMAN, ESQ. as Receiver for Puccini Clothes, Ltd. s17-W s24

Nicholas Di Tomasso

~~being~~ being duly sworn, says that he is the PRINCIPAL CLERK of the Publisher of THE NEW YORK LAW JOURNAL, a Daily Newspaper printed and published in the County of New York; that the Advertisement hereto annexed has been regularly published in the said THE NEW YORK LAW JOURNAL once in each of two successive weeks commencing on the 17th day of September 19 86

SWORN TO BEFORE ME, this 24th day of September, 19 86

Douglas P. Trucitelli
DOUGLAS P. TRUCITELLI
Notary Public, State of New York
No. 452818
Qualified in Nassau County
Commission Expires Dec. 31, 1983

Exhibit "B"

<u>Date</u>	<u>Amount</u>
March 1982	\$502,065.03 (amount initially received from Puccini bank account)
July 1982	\$31,836.06 (sale of securities)
October 1983	\$1,694.00 (tax refund)
May 1984	\$1,663.93 (tax refund)
June 1984	\$3,800.00 (amount recovered from the escrow account of the attorneys for shareholders Eugene Dann and Robert Sorrentino)
July 1985	\$5,742.25 (payment from Hyman Raffe to satisfy Federal Court judgment (Judge Nickerson))
July 1985	\$744.89 (payment from Westchester County Sheriff on execution regarding Federal Court judgment against George Sassower (Judge Nickerson))
August 1985	\$4,870.48 (payment from Kings County Sheriff on execution regarding Federal Court judgment against George Sassower (Judge Nickerson))
November 1985	\$11,500.00 (payment from Hyman Raffe in compliance with three orders of Supreme Court (Judge Nickerson))
January 1986	\$400.00 (non-interest loan from Feltman, Karesh, Major & Farbman)
April 1986	\$2,811.00 (partial payment of award against Sassower)
From inception through October 2, 1986	\$189,030.97 (interest on Puccini's account)

Exhibit "C-1"

<u>Date</u>	<u>Amount</u>	<u>Payee</u>	<u>Purpose of Payment</u>
5/9/83	\$ 5,000.00	Robert Blaikie & Co.	Premium for Receiver's Bond for two-year period.
5/9/83	90.00	Fischer's Service Bureau	Testimony of process server in connection with traverse hearing in dissolution pro- ceeding (New York Supreme Court Index No. 01816/80) on issue of service of order to show cause on George Sassower.
5/9/83	2,103.63	Fox Advertising and Court Service	Preparation and publi- cation in newspapers of statutorily required notices concerning re- ceivership and Puccini.
5/9/83	380.10	Attorneys Press, Inc.	Printing and service of Appellate Briefs.
6/28/83	3,062.00	Attorneys Press, Inc.	Printing and service of Record on Appeal and Appellate Briefs.
9/6/83	189.40	Attorneys Press, Inc.	Printing and service of Appellate Brief.
9/6/83	3,554.00	Rashba & Pokart	Court-appointed accountant's fee.
10/25/83	60.00	Fischer's Service Bureau	Process server
10/25/83	313.96	New York State Tax Department	Tax Payment
12/9/83	434.28	New York State Tax Department	Tax Payment
12/9/83	379.59	New York State Tax Department	Tax Payment
12/30/83	158.64	New York City Tax Collector	Tax Payment

Exhibit "C-2"

<u>Date</u>	<u>Amount</u>	<u>Payee</u>	<u>Purpose of Payment</u>
1/15/84	372.60	New York City Tax Collector	Tax Payment
2/10/84	56.35	Rayvid Reporting	Court Reporting
2/13/84	60.00	Urban Court Reporting	Court Reporting
2/25/84	2,500.00	Robert Blaikie & Co.	Premium for Receiver's Bond
6/14/84	262.50	Ann Weingold	Court Reporting
7/5/84	109,258.93	Feltman, Karesh & Major	Attorneys' fees and reimbursement of expenses paid pursuant to court Order
8/10/84	605.00	Ann Weingold	Court Reporting
8/16/84	203.06	Attorney's Press, Inc.	Printing and service of Appellate Brief
9/12/84	4,202.72	Feltman, Karesh & Major	Interest on attor- neys' fee award pursuant to a separate court order
9/17/84	8,724.35	Rashba & Pokart	Accountants' Fees
12/21/84	128.00	Frederic Cantor	Court Reporting
12/26/84	348.00	Ann Weingold	Court Reporting
12/26/84	334.23	Attorney's Press, Inc.	Printing and service of Appellate Brief
12/27/84	85.00	Ann Weingold	Court Reporting
1/2/85	336.00	Peter Kaufman	Transcript
2/1/85	2,500.00	Robert Blaikie & Co.	Premium for Receiver's Bond

<u>Date</u>	<u>Amount</u>	<u>Payee</u>	<u>Purpose of Payment</u>
4/3/85	140,585.41	Feltman, Karesh & Major	Attorney's fees and reimbursement of expenses paid pur- suant to court Order
4/3/85	311.94	Feltman, Karesh & Major	Interest on legal fees payment paid pursuant to court Order
4/3/85	335.00	New York State Corporate Tax Department	Tax Payment
4/15/85	250.00	New York State Corporate Tax Department	Tax Payment
4/15/85	229.00	City Tax Collector	Tax Payment
4/15/85	139.00	City Tax Collector	Tax Payment
5/25/85	1,815.00	Rashba & Pokart	Accountants' Fee
5/25/85	60.00	Urban Court Reporter	Court Reporting
6/15/85	150.00	Irving Levine	Court Reporting
6/17/85	125.00	New York State Corporate Tax Department	Tax Payment
6/17/85	75.00	New York State Corporate Tax Department	Tax Payment
6/18/85	21.00	New York State Corporate Tax Department	Tax Payment
6/24/85	2,126.60	New York Law Journal	Legal Notice

<u>Date</u>	<u>Amount</u>	<u>Payee</u>	<u>Purpose of Payment</u>
7/22/85	366.00	H.R. Lubin	Court Reporting
7/31/85	80.85	Southern District Reporter	Court Reporting
9/5/85	1,454.23	Attorneys Press, Inc.	Printing and service of Appellate Record and Brief
9/20/85	222.00	Ann Weingold	Court Reporting
10/31/85	360.00	Ann Weingold	Court Reporting
11/13/85	145.00	Ann Weingold	Court Reporting
11/25/85	303,580.01	Feltman, Karesh, Major & Farbman	Attorneys' fees and reimbursement of expenses paid pursuant to court Order
1/29/86	5,695.00	Sheriff of the City of New York	Settlement of lawsuit
2/26/86	400.00	Feltman, Karesh, Major & Farbman	Repayment of loan
2/26/86	443.00	Ann Weingold	Court Reporting
3/20/86	2,553.54	Attorney's Press, Inc.	Printing and service of Appellate Brief and Record
4/9/86	1,889.90	Attorney's Press, Inc.	Printing and service of Appellate Brief and Record
5/20/86	449.62	Attorney's Press, Inc.	Printing and service of Appellate Brief
6/13/86	22.00	New York State Corporate Tax Department	Tax Payment
6/13/86	59.00	New York State Corporate Tax Department	Tax Payment

<u>Date</u>	<u>Amount</u>	<u>Payee</u>	<u>Purpose of Payment</u>
6/13/86	62.00	New York State Corporate Tax Department	Tax Payment
6/13/86	125.00	City Tax Collector	Tax Payment
6/13/86	125.00	New York State Corporate Tax Department	Tax Payment
6/24/86	20.00	Marlene Maltese	Court Reporting
7/30/86	35.00	Sheriff Bronx County	Fee relative to Warrant of Commitment
9/5/86	788.61	Attorneys Press, Inc.	Printing and service of Appellate Brief
9/9/86	1,950.00	Rashba & Pokart	Accountant's fees
9/15/86	122,500.00	Feltman, Karesh, Major & Farbman	Legal fees pursuant to "So Ordered" Stipulation