

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF WESTCHESTER

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THE PEOPLE OF THE STATE OF NEW YORK, ex rel., GEORGE SASSOWER, on behalf of PUCCINI CLOTHES, LTD., whose assets are perfidiously held custodia legis, and on behalf of all those, including relator, who have a legitimate legal interest in such assets, SUMMONS
and
Verified
Complaint.
Plaintiff,

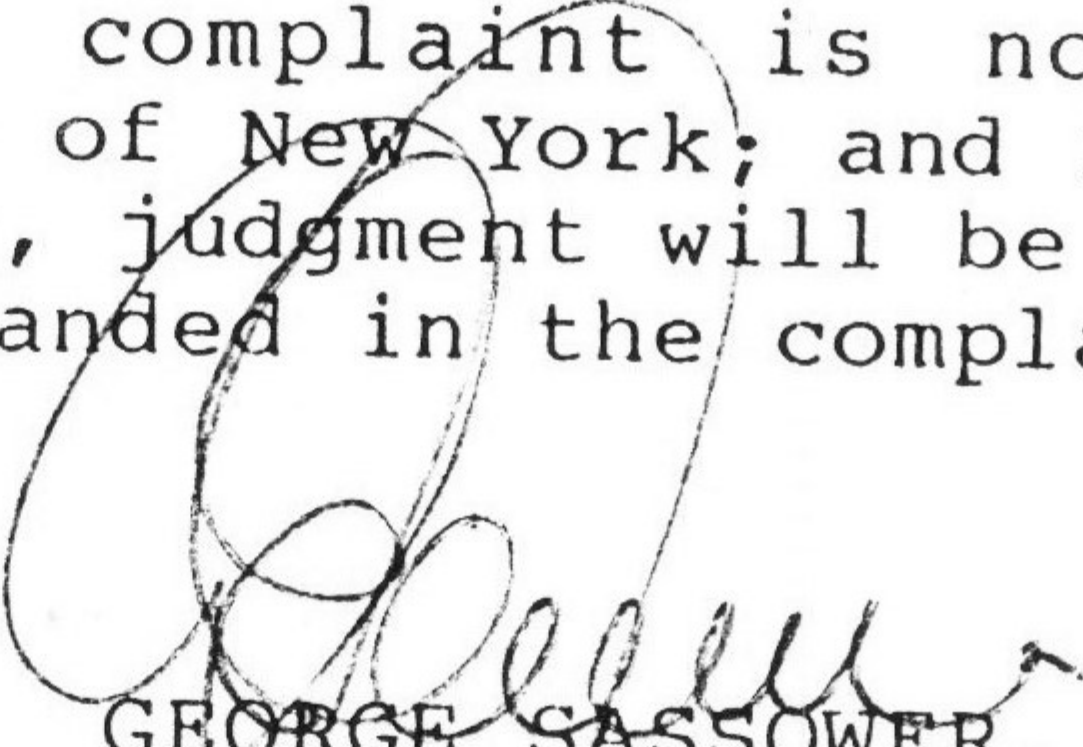
-against-

XAVIER C. RICCOBONO, MICHAEL J. DONTZIN, THOMAS V. SINCLAIR, JR., DAVID B. SAXE, DONALD DIAMOND, IRA GAMMERMAN, ALVIN F. KLEIN, FRANCIS T. MURPHY, JOSEPH W. BELLACOSA, ALBERT M. ROSENBLATT, ROBERT ABRAMS, DAVID S. COOK, KREINDLER & RELKIN, P.C., JEROME H. BARR, CITIBANK, N.A., NACHAMIE, KIRSCHNER, LEVINE & SPIZZ, P.C., LEE FELTMAN, FELTMAN, KARESH, MAJOR & FARBMAN, and RASHBA & POKART,
Defendants.

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To the above named Defendants.

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer on the plaintiff within 20 days after service of this summons and complaint, exclusive of the date of service, or within 30 days after the service is complete if this summons and complaint is not personally delivered to you within the State of New York; and in the case of your failure to appear and answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: September 4, 1988


GEORGE SASSOWER, Esq.
Attorney, pro se
16 Lake Street,
White Plains, N.Y. 10603
914-949-2169

Plaintiff designates Westchester County as the place of trial.

Venue based on plaintiff's residence.

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Plaintiff,

-against-

XAVIER C. RICCOBONO, MICHAEL J. DONTZIN, THOMAS V. SINCLAIR, JR., DAVID B. SAXE, DONALD DIAMOND, IRA GAMMERMAN, ALVIN F. KLEIN, FRANCIS T. MURPHY, JOSEPH W. BELLACOSA, ALBERT M. ROSENBLATT, ROBERT ABRAMS, DAVID S. COOK, KREINDLER & RELKIN, P.C., JEROME H. BARR, CITIBANK, N.A., NACHAMIE, KIRSCHNER, LEVINE & SPIZZ, P.C., LEE FELTMAN, FELTMAN, KARESH, MAJOR & FARBMAN, and RASHBA & POKART,
Defendants.

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THE PEOPLE OF THE STATE OF NEW YORK, ex rel., GEORGE SASSOWER, on behalf of PUCCINI CLOTHES, LTD. ["Puccini"], whose assets are perfidiously held custodia legis, and on behalf of all those who have a legitimate interest in such assets, as and for his complaint, respectfully sets forth and alleges:

1. At all of the times hereinafter mentioned, GEORGE SASSOWER ["relator"], is one of those who is a creditor of Puccini -- "the judicial fortune cookie" -- whose assets are held custodia legis, under "color of law", as a result of a decree of involuntary dissolution dated and entered on June 4, 1980.

2a. The creditor claims of relator against Puccini include: (a) a wholly unsatisfied judgment against Puccini in the sum of \$27,912.42, with interest from April 29, 1982; (b) a filed claim against Puccini for the sum of \$3,000,000; (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 by Raffe against them. An additional claim of \$20,000,000 against Puccini exists for necessary services rendered and disbursements made by relator for Puccini, and those who have a legitimate interest in its assets, and injuries sustained by relator and Puccini thereby, for which Puccini is entitled to indemnification against, inter alia, the defendants named herein.

b. Insofar as the aforementioned represents unliquidated, rather than liquidated judgment claims, it is because of the conspiratorial unconstitutional misconduct of all of the defendants herein, and others, preventing relator access to the court for relief and the liquidation of such claims.

3a. All the conveyances, expenditures and disbursements from the judicial trust assets of Puccini, as hereafter described, were the result of larceny, plundering, violation of legal mandates, and/or without consideration or fair consideration.

b. As a result of such conveyances, expenditures and disbursements, Puccini has been denuded of essentially all its hard assets, and has been rendered non-liquid and insolvent thereby, in fraud of present and future creditors.

4a. This derivative action against the defendants, on behalf of Puccini, further seeks relief under and by virtue of §278, §279, and §280 of the Debtor and Creditor Law.

b. THE PEOPLE OF THE STATE OF NEW YORK have a specific interest in this litigation since the mandatory bond, payable "to the people" (Bus. Corp. Law §1204[a][2]) is clearly insufficient to indemnify the "people" of this state for the losses incurred.

AS AND FOR A FIRST CAUSE OF ACTION

5. Relator repeats, reiterates, and realleges each and every allegation of the complaint herein marked "1" through "4" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges:

6. Puccini was involuntarily dissolved on June 4, 1980, at the instance of CITIBANK, N.A. ["Citibank"], JEROME H. BARR ["Barr"], and KREINDLER & RELKIN, P.C. ["K&R"], all of whom had fiduciary obligations towards Puccini.

7. Citibank, in order to unlawfully compensate Barr for "estate chasing", and to remedy the damages caused as a result of an internal dispute, engaged Barr's "associates" at K&R, to commence a self-defeating dissolution proceeding, and another action, against Puccini.

8. In such dissolution proceeding K&R, Barr, and K&R inundated the court with false, deceptive, and misleading affidavits, documents, and papers, and aided by a false and/or misleading affidavit of DAVID S. COOK, Esq. ["Cook"], which Cook never saw fit to correct, the Court, without a trial or hearing, ordered Puccini involuntarily dissolved.

9. By reason of their tortious conduct, including the breach of fiduciary obligations, Puccini demands judgment for damages, compensatory and punitive, against Citibank, Barr, K&R, and Cook.

AS AND FOR A SECOND CAUSE OF ACTION

10. Relator repeats, reiterates, and realleges each and every allegation of the complaint herein marked "1" through "9" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges:

11. On June 4, 1980, when Puccini was involuntarily dissolved, under an Order of the Supreme Court of the State of New York, County of New York, its assets became, as a result thereof, custodia legis.

12. Upon such dissolution, Puccini's fiduciaries, were, inter alia, the defendant, Hon. THOMAS V. SINCLAIR, JR. ["Sinclair"], the jurist who signed such dissolution Order; Hon. MICHAEL J. DONTZIN ["Dontzin"], the jurist who designated the receiver(s); Administrator XAVIER C. RICCOBONO ["Riccobono"], the administrator of Supreme Court, New York County; and ROBERT ABRAMS, Esq. ["Abrams"], the Attorney General of the State of New York.

13. Disregarding blackletter law on the subject, as well as the express provisions contained in the Order of June 4, 1980, which K&R itself prepared, K&R contemptuously interfered with the court's appointee, lied and made gross misrepresentations to him, and thereupon, with Barr, Citibank, and NACHAMIE, KIRSCHNER, LEVINE & SPIZZ, P.C. ["NKL&S"], began to unlawfully divert Puccini's judicial trust assets for their own use and benefit.

14. Puccini, albeit helpless, was and is nevertheless a constitutional "person" within the meaning of the XIV Amendment to the Constitution of the United States and mirrored provisions in the Constitution of the State of New York, and was and is entitled to "due process", "equal protection of the laws", and other fundamental legal rights, including the right to sue and have returned to it the assets which were made the subject of larceny by K&R, Barr, Citibank, and/or NKL&S.

15. By reason of the aforementioned, Puccini demands judgment against K&R, Barr, Citibank, and NKL&S, jointly and severally, for "twice" the amount unlawfully taken from it (Bus. Corp. Law §1208), in addition to other compensatory and punitive damages.

AS AND FOR A THIRD CAUSE OF ACTION

16. Relator repeats, reiterates, and realleges each and every allegation of the complaint herein marked "1" through "15" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges:

17. After about sixteen (16) months of the larceny of Puccini's trust assets by K&R, Barr, Citibank, and NKL&S, LEE FELTMAN, Esq. ["Feltman"] was appointed Puccini's successor receiver by Sinclair and Dontzin, and as required by law, he executed and filed an oath which obligated him to discharge his trust obligations "faithfully, honestly, and impartially" (Bus. Corp. Law §1204[a][1]).

18. Despite such fiduciary obligations undertaken by Feltman, as the court's agent, he entered into an unlawful and perfidious agreement and/or understanding with K&R, Barr, Citibank, and NKL&S, which provided, in sum and substance, that he would not expose the aforementioned larceny of Puccini's trust assets, he would not make any attempt to recover such assets, and he would cooperate in the making of further unlawful inroads in Puccini's judicial trust assets, in exchange for which he would receive a substantial portion of Puccini's remaining judicial trust assets, statutory fee limitations notwithstanding (Bus. Corp. Law §1217).

19. On behalf of Feltman, the vehicle for such perfidious transaction was to be FELTMAN, KARESH & MAJOR, Esqs. ["FK&M"], and thereafter FELTMAN, KARESH, MAJOR & FARBMAN, Esqs. ["FKM&F"], the law firms in which Feltman was senior partner, and firms who were never authorized by any court or judge to represent Feltman on behalf of Puccini, and at Puccini's expense.

20a There was pending at the time of such corrupt agreement a second cross-guarantee action wherein Citibank and Barr, by K&R, were suing Raffe. The relator, on Raffe's behalf, had interposed a third party complaint against (1) Puccini, (2) Dann, and (3) Sorrentino, for indemnification and contribution.

b. To controvert Raffe's allegations of the larceny of Puccini's trust assets, Citibank, Barr, and K&R, submitted three (3) perjurious affidavits, which were known to be perjurious by Feltman, FK&M, and NKL&S, the representatives and attorneys for Puccini, Dann and Sorrentino.

c. These perjurious affidavits, in part, read as follows:

(1) The affidavit of Barr, the associate of K&R, falsely swore:

"Unfortunately, it is necessary to correct some of the incredible misstatements and outright falsehoods contained in the Raffe affidavits.

The Estate of Kaufman [Barr and Citibank] has received no monies from Puccini Clothes, Ltd. ... [He and Citibank] do not have any access to it['s assets], nor have they received any monies from Puccini."

(2) Citibank also submitted a judicially-filed perjurious affidavit which swore:

"Raffe claims that the plaintiffs and the third party defendants have entered into some unspecified agreement ... and pursuant to which the 'assets [of Puccini] have been dissipated for the benefit of plaintiffs'. Once again, no documentary evidence has been submitted in support of this groundless assertion. ... The unsupported and baseless charge that the Estate [of Milton Kaufman] has dissipated the assets of Puccini Clothes, Ltd. is totally false. The Estate has received no monies whatsoever from Puccini Clothes, Ltd."

(3) Robert J. Miller, Esq., of K&R, submitted a misleading affidavit [a motion for summary judgment automatically stays all pre-trial disclosure (CPLR 3214[b])], which stated:

"... defendant (Raffe) may not argue that the automatic stay should be lifted, for discovery here is unnecessary and is simply a delaying tactic as the defendant, Hyman Raffe has absolutely no defense to this action."

d. Feltman, FK&M and NKL&S had actual knowledge that such affidavits were perjurious, and also had actual knowledge that if such perjurious affidavits were believed, then Raffe would recover judgment over as against their clients and the judicial trust, to wit., Puccini, Dann and Sorrentino.

e. Obviously, Barr, Citibank, and K&R would not have submitted such perjurious affidavits if it had not known beforehand that Feltman, FK&M and NKL&S would not expose such perjurious submission by them.

f As a result of such perjurious submission by Citibank, Barr, and K&R, aided and abetted by Feltman, FK&M and NKL&S, summary judgment was awarded in favor of Citibank and Barr against Raffe, and in favor of Raffe, as against Puccini for \$475,425.86, and against Dann and Sorrentino for \$316,950.57.

21a. To stonewall the requests for inspection of Puccini's books and records (Bus. Corp. Law §1207[C][3]), as permitted by law, Feltman and FK&M petitioned the Court for the appointment of RASHBA & POKART ["R&P"], as investigatory accountants, to investigate relator's accusations against K&R and NKL&S.

b. Undisclosed by any of the defendants in the making of such application, was that K&R were clients of R&P, and previously NKL&S had taken \$10,000 of Puccini's trust assets, "laundered" same through its account, giving R&P \$6,200 in satisfaction of the fee due from K&R and keeping for itself the sum of \$3,800 as a "laundering fee".

c. After such appointment, R&P, in order to conceal this larcenous taking, substantially for its benefit, falsely debited such \$10,000 withdrawal as a "legal fee".

22. Instructively, neither Feltman, nor FK&M, nor FKM&F ever did anything significantly intended to benefit Puccini, even when same was not contrary to K&R's interests, such as collecting the accounts receivable for merchandise sold by Puccini prior to June 4, 1980.

23. As a matter of law, judgment should be entered in favor of Puccini for all expenditures and disbursements from Puccini's judicial trust assets for the services and/or disbursements of Feltman, FK&M, FKM&F, and R&P and they, along with K&R, Barr, Citibank, and NKL&S, their co-conspirators, for their perfidious conduct and gross neglect and misconduct, with a punitive award, in addition thereto.

AS AND FOR A FOURTH CAUSE OF ACTION

24. Relator repeats, reiterates, and realleges each and every allegation of the complaint herein marked "1" through "23" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges:

25. During all times involved herein, all appointments on behalf of involuntarily dissolved corporations, such as Puccini, were governed by 22 NYCRR §660.24 and/or 22 NYCRR Part 36.

26. Neither FK&M, nor FKM&F, nor R&P were appointed by any judge or court in accordance with the mandatory procedures contained in 22 NYCRR §660.24, 22 NYCRR Part 36, and/or any other lawful provision.

27. 22 NYCRR §660.24[f] specifically provides:

"Any appointment made without following the procedures provided in this section, shall be null and of no effect and no person so appointed shall be entitled to recover any compensation for the services rendered or claimed to have been rendered".

28. By reason of the aforementioned, judgment should be entered in favor of Puccini for all monies taken, given, or awarded to FK&M, FKM&F, and/or R&P, or disbursed on their behalf, together with interest.

AS AND FOR A FIFTH CAUSE OF ACTION

29. Relator repeats, reiterates, and realleges each and every allegation of the complaint herein marked "1" through "28" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges:

30. In an Article 78 proceeding brought by relator in the Appellate Division, First Department, against the "Justices of the Supreme Court, County of New York", Abrams, the Attorney General, the attorney authorized to appear on behalf of the "Justices", represented to that Court, on or about July 11, 1984, that 22 NYCRR §660.24[f] would be obeyed by his judicial clients.

31. As a matter of judicial estoppel, by reason of the aforementioned, all members of the Supreme Court, New York County were and are estopped from making any awards in violation of 22 NYCRR §660.24[f], and FK&M, FKM&F, and R&P prohibited from receiving same, and judgment should be entered in favor of Puccini for all such monies and considerations disbursed in violation thereof, with interest.

AS AND FOR A SIXTH CAUSE OF ACTION

32. Relator repeats, reiterates, and realleges each and every allegation of the complaint herein marked "1" through "31" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges:

33. 22 NYCRR §202.52[e] provides that:

"Receivers shall file with the court an accounting at least once each year."

34a. Notwithstanding the aforementioned mandate, and the rights of those interested in the assets of Puccini, including the intervenor, in the more than eight (8) years since Puccini was involuntarily dissolved, not a single accounting has been filed -- not one!

b. In view of the aforementioned substantial failure of legal obligation, in addition to all matters heretofore stated, FK&M, FKM&F, and R&P are precluded from any award of fees or reimbursement of disbursements, and a judgment should be entered in favor of Puccini, for all monies awarded, given, taken and/or disbursed, with interest.

AS AND FOR A SEVENTH CAUSE OF ACTION

35. Relator repeats, reiterates, and realleges each and every allegation of the complaint herein marked "1" through "34" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges.

36. In proceedings in which neither the relator nor Raffe were permitted to participate, the defendant, Judge DAVID B. SAXE ["Saxe"], and the defendant, Referee DONALD DIAMOND ["Diamond"], awarded fees to FK&M, FKM&F, and/or R&P, and made other awards.

37. With the corrupt participation of FK&M, FKM&F, and/or R&P, the defendant Saxe and the defendant Diamond failed and/or refused to file the mandated statements pursuant to Judiciary Law §35-a or 22 NYCRR Part 26.

38. By reason of the aforementioned such awards are and were unlawful and unauthorized, and judgment should be entered in favor of Puccini against FK&M, FKM&F, R&P, Saxe and Diamond for such sums, jointly and severally, with interest.

AS AND FOR A EIGHTH CAUSE OF ACTION

39. Relator repeats, reiterates, and realleges each and every allegation of the complaint herein marked "1" through "38" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges:

40. Bus. Corp. Law §1217, expressly and/or impliedly prohibits Feltman, directly and/or indirectly, receiving any monies and/or other considerations from any other source but Puccini, and only such award as authorized by a court or judge thereof, particularly when such sums are not reported as required by Judiciary Law §35-a and/or 22 NYCRR Part 36, and open to public inspection.

41. Employing his position as a court appointed judicial receiver, Feltman and/or his law firms, FK&M and/or FKM&F have extorted substantial monies and other valuable considerations from Raffae and SAM POLUR, Esq. ["Polur"], which are the property of Puccini.

42. Such extorted monies and other considerations were obtained with the aid of K&R, Barr, Citibank, NKL&S, R&P, and others, and with punitive damages, judgment should be entered in favor of Puccini for such monies and other considerations and/or their monetary value.

AS AND FOR A NINTH CAUSE OF ACTION

43. Relator repeats, reiterates, and realleges each and every allegation of the complaint herein marked "1" through "42" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges:

44. Despite the mandatory prohibition, permitting no discretion whatsoever, as found in 22 NYCRR §660.24[f], and the representation of the Attorney General on behalf of the "Justices of the Supreme Court", the defendant, Saxe and the defendant, Diamond authorized payments to FK&M, FKM&F, and R&P from Puccini, and/or authorized disbursements on their behalf, and Saxe and Diamond are, to the extent of such payments liable to Puccini, for such amounts, with interest, and judgment is thereby requested against them for same, with interest included.

AS AND FOR A TENTH CAUSE OF ACTION

45. Relator repeats, reiterates, and realleges each and every allegation of the complaint herein marked "1" through "44" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges:

46. Since at least 1983, the defendants Sinclair, Dontzin, and Riccobono, Puccini's trustees, have known, or should have known, that Feltman and his law firm were invariably acting contrary to the interests of Puccini, the judicial trust.

47. Despite such knowledge and/or facts triggering such knowledge, neither Sinclair, Dontzin, nor Riccobono, made any attempt to remove Feltman from such position of trust (Judiciary Law §13-a), or increase the amount of his bond, and consequently, as Puccini's trustees, they are liable to it for such derelictions by Feltman, and a money judgment is demanded as against them for any losses sustained by Puccini, not covered by the filed bond.

AS AND FOR A ELEVENTH CAUSE OF ACTION

48. Relator repeats, reiterates, and realleges each and every allegation of the complaint herein marked "1" through "47" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges:

49. On or about January 23, 1984, Riccobono was served with a copy of a summons and complaint issued from the United States District Court which clearly revealed Feltman's perfidious conduct, as well as, to say the least, Administrator Riccobono's own gross neglect of administrative duties and responsibilities.

50. As a result thereof, Administrator Riccobono was transactionally involved in the litigation and had a common law, constitutional, and Judiciary Law §14 disability, and was disqualified from further involvement in the judicial process, except as a litigant.

51. Despite the aforementioned disqualification disability, Riccobono personally, and/or through his personal designees, the defendant, Diamond and the defendant, Mr. Justice IRA GAMMERMAN ["Gammerman"], acting in conspiratorial concert with K&R, Barr, Citibank, FK&M, FKM&F, Feltman, NKL&S, and R&P, conducted themselves in every respect contrary to Puccini's interests.

52. In addition thereto, they commandeered and corrupted other jurists, to conduct themselves contrary to Puccini's interest, including denying it access to the court for relief.

53. The charges of misconduct against Riccobono, Diamond, Gammerman, and other members of the judiciary, do not include decision-making judicial functions involving discretion.

54. That by reason of the aforementioned, judgment is demanded in favor of Puccini against Feltman, FK&M, FKM&F, R&P, K&R, Barr, Citibank, Riccobono, Diamond, and Gammerman, jointly and severally, for compensatory and punitive damages.

AS AND FOR A TWELFTH CAUSE OF ACTION

55. Relator repeats, reiterates, and realleges each and every allegation of the complaint herein marked "1" through "54" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges:

56. The defendant JOSEPH W. BELLACOSA ["Bellacosa"] was, and the defendant ALBERT M. ROSENBLATT ["Rosenblatt"] is, the Chief Administrator of the Office of Court Administration for the State of New York.

57. The defendant FRANCIS T. MURPHY ["Murphy"] was and is the Presiding Justice of the Appellate Division, First Judicial Department.

58. On and after November 7, 1983, with the surfacing of the "hard evidence" of the larceny of Puccini's judicial trust assets, the attending perjury, the perfidious conduct, and other criminal and unethical conduct by K&R, Barr, Citibank, Feltman, FK&M, and others, they began an intensive campaign to corrupt officials, including members of the judiciary.

59. Riccobono's activities in the Supreme Court, New York County, as distinguished from the Appellate Term, are wholly administrative, and his administrative powers and authority is at the "pleasure" of the Chief Administrator, "for a period not exceeding one year" 22 NYCRR §80.2[a].

60. Notwithstanding actual knowledge by Murphy, Bellacosa, and Rosenblatt, that Riccobono was employing his administrative office for criminally corrupt racketeering purposes, particularly in the Puccini matter, enjoying economic benefits thereby, and had a Judiciary Law §14 disqualification, Murphy, Bellacosa, and Rosenblatt, have permitted him to remain as administrator, and indeed have re-appointed him to that position.

61. Neither Murphy, Bellacosa, nor Rosenblatt have attempted to curb and/or suppress the unconstitutional and/or unlawful activities of Riccobono, or those acting on his behalf, and particularly Diamond and Gammerman, all to the damage of "the people", Puccini, the persons interested interested in Puccini's assets, including relator, for which judgment is requested, compensatory and punitive.

AS AND FOR A THIRTEENTH CAUSE OF ACTION

62. Relator repeats, reiterates, and realleges each and every allegation of the complaint herein marked "1" through "61" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges:

63. As the conduct of K&R, Citibank, Feltman, FK&M, and FKM&F became more desperate and egregious, primarily because of Feltman's inability to file a truthful accounting and the settlement thereof, as mandated by law, they caused the personal corruption and affirmative cooperation of Murphy, Bellacosa, and Rosenblatt in this criminal racketeering adventure.

64. Such corruption, superimposed upon the corruption of Riccobono and others, resulted in a "barbaric reign of terror" to be visited upon Raffae, Polur, and relator, in order to compel them to abandon their interests in Puccini or advance its cause.

65. Such "barbaric reign of terror", which was intended to and did cause prejudice, included trialess convictions and incarcerations, unlawful fines and penalties, orders to seize word processing equipment, and disciplinary proceedings.

66. Particularly unconstitutional, unlawful, odious, and offensive was the conduct of Mr. Justice ALVIN F. KLEIN ["Klein"], who in a legitimate lawsuit commenced by relator against, inter alia, Riccobono and Diamond, without a trial, convicted Raffae, Polur, and relator, in one document, of non-summary criminal contempt, and sentenced each to be incarcerated for thirty (30) days.

67a. Polur was sentenced and incarcerated, without benefit of a trial, based on an uncorroborated and false assertion by DONALD F. SCHNEIDER, Esq. ["Schneider"], a partner in FKM&F, that Polur served upon him a summons.

b. Even when it was undisputed that such uncorroborated accusation was false and contrived, Klein failed and refused to release Polur from his trialess incarceration, and he served his full term.

c. Pursuant to such trialess conviction, based upon an uncorroborated and false accusation, Murphy's controlled Grievance Committee began disciplinary proceedings against Polur.

d. Consequently Polur was compelled to abandon his legitimate legal activities, which were of benefit to Puccini, in order to have the disciplinary proceedings terminated.

e. Otherwise stated, Murphy employed the Grievance Committee machinery in order to aid this privately motivated, criminal racketeering adventure.

68a. Relator, like Polur, served his full term, less good time allowance, but refused to leave the scene, and was disbarred because of Klein's, and two (2) other manifestly unconstitutional convictions.

b. In such disbarment proceeding, relator was not permitted to controvert, law or fact, such trialess convictions, although unquestionably unconstitutional, wherein even jurisdiction to convict was absent.

c. In such sham disciplinary scenario, Murphy sought and obtained the cooperation of Presiding Justice MILTON MOLLEN ["Mollen"].

69. Now, with plaintiff refusing to succumb to such judicial terrorism, more than eight (8) years later "the criminals with law degrees", the "bag-men for the judiciary", still have not accounted, nor settled such accounting, notwithstanding multiple statutes and court rules, mandating a filed accounting and settlement thereof, at least one time each year.

70a. Raffe, who was also convicted and sentenced to be incarcerated, paid millions of dollars to K&R, FKM&F, and/or their clients; executed releases to "the criminals with law degrees", and their clients, including Riccobono, Diamond, and Gammerman, and all other jurists of that Court, and as long as he agrees to keep silent about the larceny and plundering of Puccini's trust assets, including to the governmental criminal investigatory authorities, he will not be incarcerated.

b. In Raffe's words "They are bleeding me to death".

c. Such compelled action by Raffe is to the prejudice of Puccini, and is so intended by the courts.

71. By reason of the aforementioned, a money judgment is demanded against all the defendants for compensatory and punitive damages.

AS AND FOR A FOURTEENTH CAUSE OF ACTION.

72. Relator repeats, reiterates, and realleges each and every allegation of the complaint herein marked "1" through "71" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges:

73. Riccobono, notwithstanding an "interest" Judiciary Law §14, and other disqualification, has by sua sponte ukase and computer manipulation, designated Diamond and Gammerman, at nisi prius, to stonewall Puccini's absolute right to access to the courts for judicial relief.

74. Gammerman, by fictitious orders, including one dated March 11, 1986, based upon "phantom" papers and documents, not existing in the County Clerk's Office or on the computer controlled by the Office of Court Administration, dragooned all Puccini litigation to himself, including those proceedings and actions wherein he is a named and active defendant, respondent, or Dennis v. Sparks (449 U.S. 24) witness, and stayed same.

75. By such Order, without any notice of motion or order to show cause, without any supporting papers, without any opposing papers, without any trial, without any anything, simply found relator to be in criminal contempt and imposed criminal sanctions against him.

76. Such sham and fictitious orders and ukases by Diamond and Gammerman, with the participation of the other defendants have denied Puccini and the others interested in its assets judicial relief, including judgments thereby.

77. Consequently, in addition to a judgment against all the defendants for compensatory and punitive damages, their claims have the force and effect of judgments within the meaning of CPLR §6201 and other provisions of the law.

AS AND FOR A FIFTEENTH CAUSE OF ACTION

78. Relator repeats, reiterates, and realleges each and every allegation of the complaint herein marked "1" through "77" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges:

79. The Attorney General of the State of New York, has by mandate of law been designated the statutory fiduciary of the assets and affairs of all involuntarily dissolved corporations with discretionary powers (e.g. Bus Corp. Law §1214[a]), and mandatory duties (e.g. Bus. Corp. Law §1216[a]).

80. Notwithstanding such fiduciary obligations, imposing upon the Attorney General undivided loyalty to his judicial trust, his services have been dragooned by the judicial defendants to represent them in Puccini litigation, including most particularly, Riccobono, Murphy, and Bellacosa, and their thrall.

81a. In addition thereto, in such conflicting representation, Abrams, the Attorney General, and Cook, his subordinate, have taken with them the confidential information given them by relator on behalf of Puccini.

b. Thus for example, relator gave Cook on behalf of Puccini his confidential information concerning the corrupt activities of Saxe, as was his constitutional right (Art 1, §9 of the N.Y. State Constitution), and his professional obligation (Code of Professional Responsibility, Disciplinary Rule 1-103). Thereafter when suit was brought on behalf of Puccini against Saxe for money damages, it was Cook who represented Saxe while simultaneously purporting to represent Puccini as its statutory fiduciary.

82. By reason of the aforementioned, Puccini demands judgment for money damages, compensatory and punitive against all the defendants, since they are operating in conspiratorial consort with each other.

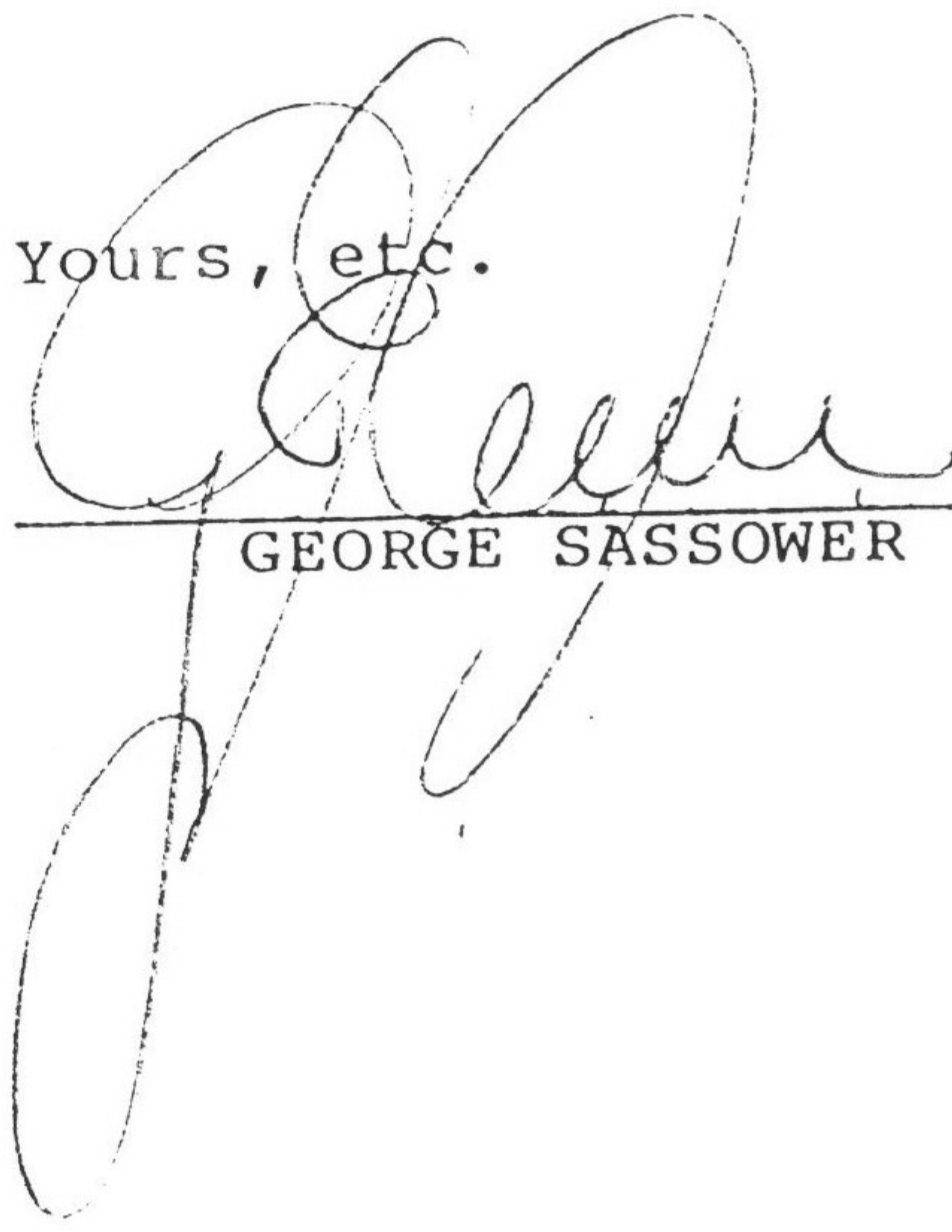
AS AND FOR A SIXTEENTH CAUSE OF ACTION

83. Relator repeats, reiterates, and realleges each and every allegation of the complaint herein marked "1" through "82" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges:

84. By reason of the aforementioned, relief is requested on behalf of Puccini, and those interested in its assets, including relator, as set forth in Article 10 of the

Debtor and Creditor Law, Article 62 and 63 of the CPLR, and other provisions in the law, in addition to money damages, and attorneys' fees and disbursements.

Yours, etc.



A handwritten signature in cursive script, appearing to read 'G. Sassower', is written over a horizontal line. Below the line, the name 'GEORGE SASSOWER' is printed in a simple, sans-serif font.

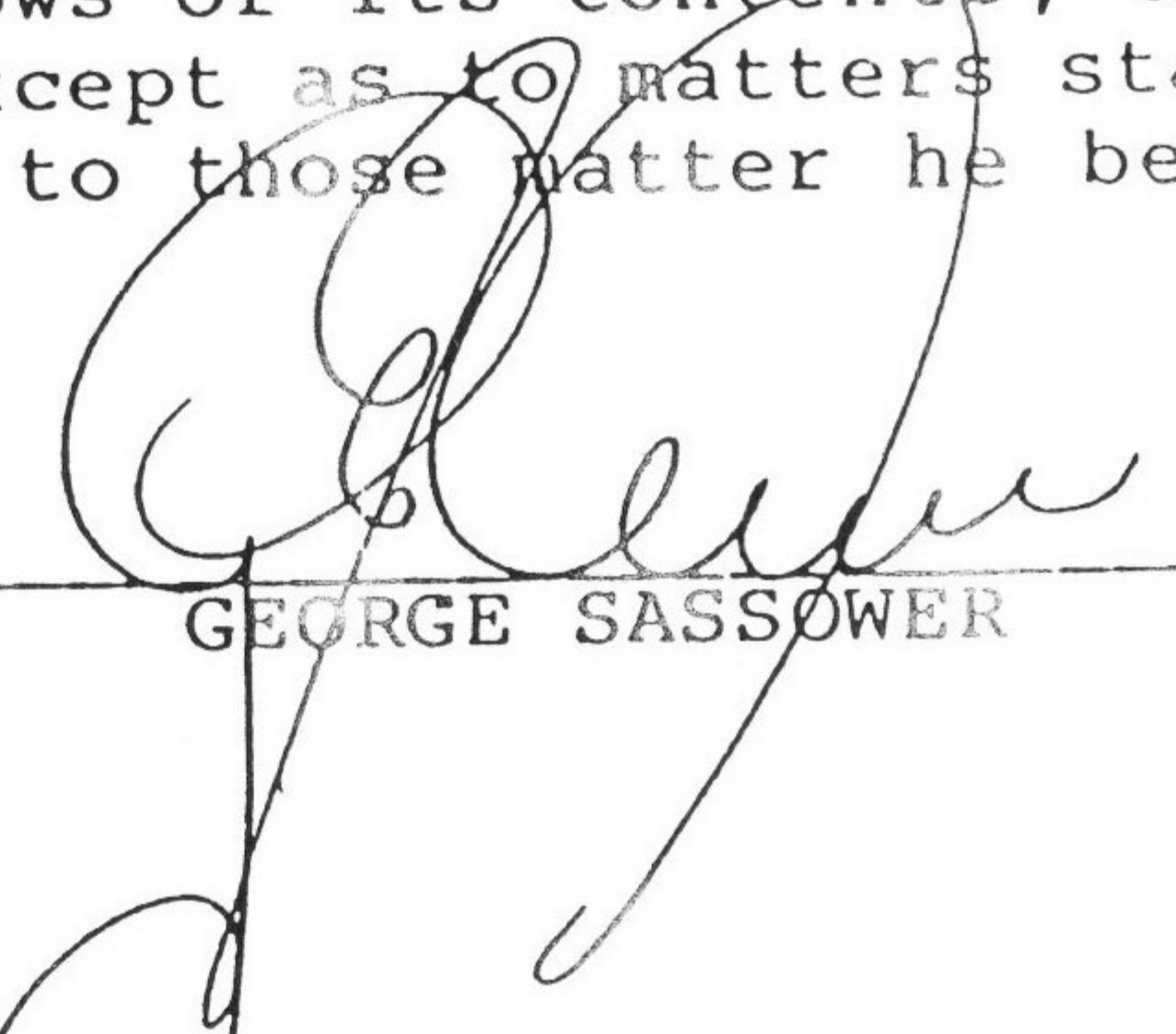
GEORGE SASSOWER, Esq.
Attorney pro se
16 Lake Street,
White Plains, N.Y. 10603
(914) 949-2169

STATE OF NEW YORK
COUNTY OF WESTCHESTER

)
) ss.:
)

GEORGE SASSOWER, first being duly sworn, deposes,
and says:

Deponent is the plaintiff in the within action,
has read the foregoing complaint, knows of its contents, and the
same is true to my his knowledge, except as to matters stated to
be on information and belief, and as to those matter he believes
them to be true.



GEORGE SASSOWER

Sworn to before me this
4th day of September, 1988

Michael J. Kane
Qualified in Westchester County
Commission Expires 1/21/89