

# United States District Court

WESTERN

DISTRICT OF

WASHINGTON

UNITED STATES OF AMERICA for the  
benefit of GEORGE SASSOWER, and  
GEORGE SASSOWER

SUMMONS IN A CIVIL ACTION

v.

CASE NUMBER:

GENERAL INSURANCE COMPANY OF AMERICA

090-0129

TO: (Name and Address of Defendant)

GENERAL INSURANCE COMPANY OF AMERICA  
Safco Plaza,  
Seattle, Washington 98185

YOU ARE HEREBY SUMMONED and required to file with the Clerk of this Court and serve upon

PLAINTIFF'S ATTORNEY (name and address)

GEORGE SASSOWER  
16 Lake Street,  
White Plains, New York 10603  
(914) 949-2169

an answer to the complaint which is herewith served upon you, within 20 days after service of  
this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken  
against you for the relief demanded in the complaint.

**BRUCE RIFKIN**

CLERK

DATE

11/30/90

BY DEPUTY CLERK

*[Handwritten signature]*

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

-----x  
UNITED STATES OF AMERICA for the  
benefit of GEORGE SASSOWER, and  
GEORGE SASSOWER,

Plaintiffs,

-against-

GENERAL INSURANCE COMPANY OF AMERICA,

Defendant.  
-----x

Docket #

90-0129

Jury Trial Demanded

Plaintiffs, UNITED STATES OF AMERICA for the  
benefit of GEORGE SASSOWER, and GEORGE SASSOWER, as and for their  
verified complaint, respectfully set forth and allege:

1. On October 27, 1986, plaintiff, a citizen of New  
York, filed a petition in bankruptcy in the United States  
District Court of the Southern District of New York, pursuant to  
Chapter 7 of Title 11 of the United States Code.

2a. The schedules and other documents filed by  
plaintiff in such bankruptcy proceedings clearly revealed that  
plaintiff's vast assets greatly exceeded his comparatively  
minimal liabilities.

b. Under Title 11, anyone residing, having a  
domicile, a place of business, or property in the United States,  
except a railroad, an insurance company, or similar institutions  
listed in 11 U.S.C. §109(b) may file a voluntary petition in  
bankruptcy, without regard to his solvency or liquidity.

c. In every respect, plaintiff was such qualified person since he is a native-born American, a battle-starred veteran of World War II, whose entire life, except for military service, has been as a domiciliary of the United States, and all his property is in this country.

3. Unquestionably plaintiff, individually, was entitled to all his vast assets in his bankruptcy estate, after payment of his then minimal liabilities and administrative expenses.

4a. On or about the 3rd day of December, 1986, JEFFREY L. SAPIR, Esq. ["Sapir"], was designated the Chapter 7 trustee of plaintiff's estate, and he voluntarily chose to accept such designation.

b. Plaintiff had no part in such designation and appointment of Sapir as trustee.

5a. On information and belief, at the time of Sapir's designation and acceptance, the defendant, GENERAL INSURANCE COMPANY OF AMERICA ["General"], a corporation of the State of Washington, had caused to be issued a surety bond assuring faithful performance of Sapir's duties as trustee.

b. On information and belief, at all times relevant herein, such surety bond as issued by defendant was in full force and effect.

c. On information and belief such surety bond issued by defendant, expressly and/or impliedly, provided that plaintiff, or those similarly situated, could bring suit on such bond in the name of the United States of America (Bankruptcy Rule 2010(c)).

6. By reason of Sapir's acceptance of such trust designation, he owed fiduciary obligation to the plaintiffs who were injured by reason of Sapir's perfidious activities.

7. Notwithstanding Sapir fiduciary obligations to plaintiffs, almost from the outset, he began to intentionally betray his trust responsibilities, and instead charted a course of conduct intending to aid, abet, and cooperate with adverse criminal interests.

8. As against minimal liabilities, the major assets of plaintiff's bankruptcy estate included large claims against (a) PUCCINI CLOTHES, LTD. ["Puccini"]; (b) LEE FELTMAN, Esq. ["Feltman"]; FELTMAN, KARESH, MAJOR & FARBMAN, Esqs. ["FKM&F"]; KREINDLER & RELKIN, P.C. ["K&R"] and its clients; and (c) HYMAN RAFFE ["Raffe"] and A.R. FUELS, INC. ["A.R."].

9a. Puccini was involuntarily dissolved by a state court on June 4, 1980 and Feltman was its court-appointed receiver.



b. Such judicial trust assets became the subject of massive criminal larceny and plundering engineered by K&R, Feltman and FKM&F -- 'the criminals with law degrees' -- and their co-conspirators.

c. Consequently Feltman could not file an accounting, a mandatory requirement in every American jurisdiction, including New York, without exposing their aforementioned egregious criminal racketeering conduct, and much more.

10a. To compel submission and silence to the aforementioned criminal conduct, and aided and abetted by jurists and officials whom they had corrupted, these 'criminals with law degrees' began a 'reign of terror' against plaintiff and others.

b. This 'reign of terror' included repeated trialess, manifestly unconstitutional, convictions for non-summary criminal contempt, with incarcerations and/or fines, monetary and otherwise; seizing bank deposited assets pursuant to 'phantom' judgments; orders directing the Sheriff to "break into [plaintiff's] apartment", "seize his word processor and software", and "inventory his property", criminal extortion, and similar racketeering activities.

c. Thus one victim of such criminal extortion by 'the criminals with law degrees' has paid them "more than \$2.5 million" in order not to be incarcerated under such trialess conviction scenarios (see New York Village Voice, June 6, 1989; New Jersey Law Journal, July 13, 1989; Ottawa Illinois, Daily Times, June 17, 1989; Hibbing, Minn., Daily Tribune, June 18, 1989), and is still paying. As he uttered "they are bleeding me to death".

d. Indeed, even where a federal order required, in haec verba, that the substantial fines for non-summary criminal contempt, under a trialess scenario, was to be made payable "to the [federal] court", these monies were diverted to the private pockets of these 'indulgence peddlers', and the federal government received nothing.

e. It was with these criminal elements, and their racketeering adventures, that Sapir chose to aid and abet when he abandoned his trust obligations.

11. It was these despotic and unlawful 'seizure' orders which were a prime reason for the filing of plaintiff's petition in bankruptcy, since it thereby vested plaintiff's property in the federal district court, and beyond the reach of corrupt state officials.

12a. As against Puccini, the claims of petitioner's bankruptcy estate included (1) a judgment of \$27,912.42, with interest from April 26, 1982; (2) an unliquidated claim of \$3,000,000; (3) an attorney's lien on a judgment of Raffé against Puccini of \$475,425.86; (4) an attorney's lien on a subrogated claim of Raffé against Puccini based upon his payment of a judgment; (5) and other substantial claims.

b. As against Raffé and A.R., plaintiff had contractually based claims in the millions, with a liquidated amount of \$120,000, being conceded as due and payable.

c. As against Feltman, FKM&F, K&R, and its clients, plaintiff had claims which legitimately were worth very many millions of dollars.

13a. Sapir involved himself with these judicial criminals, all in violation of his fiduciary duties and responsibilities.

b. Plaintiff's many requests that Sapir properly perform his trust duties or resign, were all ignored and/or refused, since the 'criminals with law degrees' desired that he remain in that position and aid their criminally corrupt activities.

14a. In order to have 'standing', as a Chapter 7 creditor, there must be (1) a legally cognizable debt in favor of the creditor, and (2) a properly filed "proof of claim" based on same.

b. After receiving assurances that there would be no adverse repercussions, criminal or civil, by, inter alia, Sapir for the filing of false and perjurious proofs of claim, such proofs were executed by Feltman, K&R, and IRA POSTEL, Esq. ["Postel"].

c. The aforementioned alleged creditors executed and caused to be filed two (2) proofs of claim each, or a total of six (6) proofs of claim.

d. Since each of the aforementioned proofs of claim were false and perjurious, neither they nor those they purported to represent, had legal 'standing' under the bankruptcy laws and rules of the United States.

e. These six (6) proofs of claim in the approximate amount of twenty-one million dollars (\$21,000,000, in amount, accounted for approximately ninety-five percent (95%) of the claims filed against plaintiff's bankruptcy estate.

f. On March 9, 1987, when Sapir failed and/or refused to file a rejection of all or any of the aforementioned false claims, plaintiff did so, and requested a hearing for April 27, 1987.

g. In the months that followed plaintiff took every possible legal step within the bankruptcy proceeding to compel Sapir to adjudicate the validity of such claims, all without success.



h. When plaintiff, not Sapir, finally, was able to obtain an adjudication of same, it turned into a 'bloody massacre', and all six (6) false and fictitious claims were withdrawn.

15. Repeatedly, plaintiff insisted that Sapir had an obligation to trigger criminal proceedings against the aforementioned based, inter alia, on 18 U.S.C. §3057, §152, and §3284, but Sapir chose to give his allegiance to these judicial violators, not plaintiff's bankruptcy estate.

16. Sapir had actually knowledge that the judgments asserted by the aforementioned were 'phantom', and plaintiff's monies levied and seized unlawful, but he made no attempt to recover same.

17. Sapir also had actual knowledge that by compelling the filing of the accounting by Feltman for Puccini, as was mandated by law to be performed "at least once a year", much of the estate assets would be liquidated, but Sapir intentionally failed and deliberately failed to do so.

18. Nor did Sapir make any attempt to collect the one hundred twenty thousand dollars (\$120,000) which A.R. conceded was due plaintiff's estate.

19. In every other respect, Sapir intentionally failed and refused to recover any monies or property due plaintiff's estate in bankruptcy, although such failures were contrary to his own personal legitimate pecuniary interest.

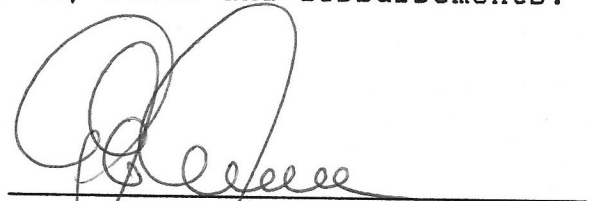
20. Eventually, Sapir filed a knowingly false document stating that plaintiff's estate in bankruptcy was without assets, thus closing out his estate, leaving plaintiff without the legal protection provided by the law of bankruptcy.

21a. By reason of the aforementioned, plaintiffs have been injured to the extent of one hundred million dollars (\$100,000,000).

b. To the extent that defendant's bond may be insufficient to cover such losses to plaintiffs, plaintiffs reserve their rights against others responsible thereunder.

WHEREFORE, plaintiffs demand judgment against the defendant in the sum of one hundred million dollars (\$100,000,000), together with interest, costs and disbursements.

Dated: January 23, 1990

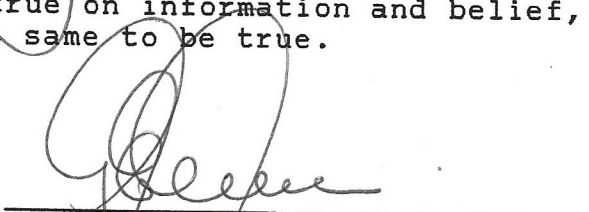


GEORGE SASSOWER

GEORGE SASSOWER, affirms the following to be true under penalty of perjury.

Affirmant has read the foregoing complaint, knows its contents, and the same is true to his own knowledge except as to matters stated thereon to be true on information and belief, and as to those matters he believes same to be true.

Dated: January 23, 1990



GEORGE SASSOWER