UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

----------x

GEORGE SASSOWER, Docket #

Plaintiff,

-against-

WHITEFORD, TAYLOR & PRESTON; FIDELITY AND DEPOSIT COMPANY OF MARYLAND; STAFFORD, FREY, COOPER & STEWART; GENERAL INSURANCE COMPANY OF AMERICA; LEE FELTMAN; FELTMAN, KARESH, MAJOR & FARBMAN; KREINDLER & RELKIN, P.C.; CITIBANK, N.A.; JEFFREY L. SAPIR; WILLIAM L. DWYER; JAMES L. OAKS; WILFRED FEINBERG; CHARLES L. BRIEANT; GEORGE C. PRATT; EUGENE H. NICKERSON; WILLIAM C. CONNER; NICHOLAS H. POLITAN; SOL WACHTLER; FRANCIS T. MURPHY; XAVIER C. RICCOBONO; DONALD DIAMOND; ALVIN F. KLEIN; DAVID B. SAXE; IRA GAMMERMAN; MARTIN EVANS; DENIS DILLON; and ROBERT ABRAMS,

Jury Trial Demanded

Defendants.

----------x

Plaintiff, as and for his Verified Complaint, respectfully sets forth and alleges:

1a. Plaintiff, a private person, is a native-born American citizen, a battle-starred veteran of World War II, whose entire life, except for military service, has been as a resident in the United States, and all his property is in this country.

b. Plaintiff is constitutionally entitled to a fair and impartial judicial adjudication in every court, state and federal, of the United States, including in this Court, which includes the right to make a "full" presentation of the evidence.

2a. The jurisdiction of this Court is invoked pursuant to the provisions of 28 U.S.C §§1331, 1343, this being a suit in law and equity which is authorized by law, 42 U.S.C. §1983 et seq., brought to redress the deprivation under color of state law, statute, ordinance, regulation, custom or usage of rights, privileges, and immunities of the United States or by Act

of Congress providing for equal protection of citizens and residents, Amendment XIV of the Constitution of the United States, and pendent, non-federal jurisdiction. The rights here sought to be redressed are rights guaranteed by the due process, privileges and immunities, and equal protection clauses of the XIV Amendment to the Constitution of the United States, and the matter in controversy exceeds the sum of $10,000, as hereinafter more fully appears herein.

b. The jurisdiction of this Court is also invoked directly under the Constitution of the United States for the violation of plaintiff's rights guaranteed therein.

c. The jurisdiction of this Court in further invoked pursuant to the Racketeer Influenced and Corrupt Organizations Act ["RICO"] -- 18 U.S.C. §§1961, 1964[a][c] -- and is brought by plaintiff in connection with schemes devised, conducted and/or participated in by the "racketeering defendants" herein, through a pattern of racketeering activity, all to the detriment of plaintiff and others allegedly associated with him.

3a. Personal jurisdiction over the claims for relief is under 18 U.S.C. §1964[a][b], 28 U.S.C. §§1331, 1343, and directly under the Constitution of the United States which, inter alia, permits access to the courts to every person for the vindication of personal and property rights.

b(1) The defendant, WHITEFORD, TAYLOR & PRESTON ["WT&P"], is a firm of attorneys, whose principal place of business is in the City of Baltimore, the State of Maryland.

(2) The defendant, FIDELITY AND DEPOSIT COMPANY OF MARYLAND ["F&D"], was incorporated in and its principal office is in the City of Baltimore, State of Maryland.

c(1) The defendant, GENERAL INSURANCE COMPANY OF AMERICA ["General"] is a State of Washington corporation which, with its affiliate companies, writes insurance nationwide.

(2) The defendant, STAFFORD, FREY, COOPER & STEWART ["SFC&S"], is a firm of attorneys, whose clients include General and F&D.

(3) The defendant, WILLIAM L. DWYER ["Dwyer"], is a U. S. District Judge in the State of Washington.

d(1) The defendant, JAMES L. OAKS ["Oaks"], is the Chief Judge of the CIRCUIT COURT OF APPEALS for the SECOND CIRCUIT ["CCA2d"].

(2) The defendant, WILFRED FEINBERG ["Feinberg"], is the former Chief Judge of CCA2d.

(3) The defendant, GEORGE C. PRATT ["Pratt"], is a circuit judge of CCA2d.

(4) The defendant, CHARLES L. BRIEANT ["Brieant"], is the Chief Judge of the U.S. DISTRICT COURT for the SOUTHERN DISTRICT OF NEW YORK ["USDC: SDNY"].

(5) The defendant, NICHOLAS H. POLITAN ["Politan"], is a United States District Judge in the State of New Jersey.

(6) The defendant, EUGENE H. NICKERSON ["Nickerson"], is a U.S. District Judge for the Eastern District of New York.

(7) The defendant, WILLIAM C. CONNER ["Conner"], is a U.S. District Judge for the Southern District of New York.

(8) The defendant, SOL WACHTLER ["Wachtler"], is Chairman of the ADMINISTRATIVE BOARD of the NY STATE OFFICE OF COURT ADMINISTRATION ["OCA"].

(9) The defendant, FRANCIS T. MURPHY ["MURPHY"], is Presiding Justice of the APPELLATE DIVISION: FIRST JUDICIAL DEPARTMENT of the STATE OF NEW YORK ["AD1st"].

(10) The defendant, XAVIER C. RICCOBONO ["Riccobono"], is the Administrator of the SUPREME COURT of the STATE OF NEW YORK, COUNTY OF NEW YORK ["SCNY"].

(11) The defendant, DONALD DIAMOND ["Diamond"], is a Referee of SCNY.

(12) The defendants, ALVIN F. KLEIN ["Klein"], DAVID B. SAXE ["Saxe"], IRA GAMMERMAN ["Gammerman"], and MARTIN EVANS ["Evans"] were or are jurists in or assigned to SCNY.

(13) The defendant, ROBERT ABRAMS ["Abrams"], is the ATTORNEY GENERAL of the STATE OF NEW YORK ["NYAG"].

(14) The defendant, DENIS DILLON ["Dillon"], is the DISTRICT ATTORNEY of NASSAU COUNTY ["DA-Na"].

e. All of the aforementioned jurists and officials are sued herein in their individual and representative capacity, except the state jurists and officials who, with respect to monetary damages, are deemed to be conducting themselves for their own personal benefit and contrary to the interests of their sovereign.

f(1) The defendants, LEE FELTMAN ["Feltman"]; FELTMAN, KARESH, MAJOR & FARBMAN ["FKM&F"]; KREINDLER & RELKIN, P.C. ["K&R"], and CITIBANK, N.A. ["Citibank"], are "hard core" criminal racketeers.

(2) The defendant, JEFFREY L. SAPIR, operating under "color of federal law" is one who was corrupted by, inter alia, the "hard core" criminal racketeers.

g(1) The aforementioned defendants, all of whom are engaged in racketeering enterprise, operating in conspiratorial consort, are either venued in Maryland, committed tortious conduct intended to be consummated in Maryland, and/or they could reasonably anticipate that their activities would be consummated, inter alia, in the State of Maryland.

(2) Furthermore, the ends of justice require that other parties residing in other districts be brought before this Court, particularly since most of the racketeering defendants, as part of this racketeering schemes, have barred plaintiff from access to the courts in their venues for relief, all such local injunctions without notice, without a hearing and/or without legal cause.

4a(1) The "racketeering defendants" employ the courts, state and federal, and other agencies and forums, including the legal media, in order to engage in a continuous and ongoing pattern of "criminal racketeering activities".

(2) The "racketeering defendants", steal, plunder, and otherwise unlawfully siphon assets from helpless judicial trusts and estates, including those in which plaintiff has legal interests, and engage in other racketeering activities, causing racketeering, constitutional, civil rights, and personal injuries to him, his business, his property, his constitutional and civil rights, all in flagrant violation of federal and state law.

(3) The courts, state and federal, nisi prius and appellate, in which the defendants are associated, are "enterprises", but not the only enterprises for such racketeering activity, and the defendants' activities substantially affect interstate and foreign commerce.

b(1) The end purpose of most of these racketeering defendants, state and federal, by their conspiratorial, concerted and coordinated actions, is to steal and unlawfully plunder from helpless estates and trusts, which are "persons" within the meaning of Amendment V and XIV of the U.S. Constitution, or to cooperate in such criminal and unlawful racketeering adventures, for their own private gain and/or to benefit the insatiable monetary appetites of their cronies, social and political, or to give aid and succor to such defendants and their activities.

(2) The racketeering defendants, most of them operating "under color of law" conspire, and do, "fix" cases and controversies adverse to plaintiff, by various means and methods, some of which are described herein, and/or deprive plaintiff of due process, and/or deprive plaintiff from making a "full" presentation in judicial tribunals.

(3) "Fixing", as employed in this complaint, whatever its form or means of communication, including the publication of orders, decrees, decisions and/or opinions, which deprive a litigant of "due process", within the meaning of Dennis v. Sparks (449 U.S. 24 [1980]), and is here asserted to be a non-judicial activity, even when such activity is performed by a judge or court.

(4) The judicial robe is not an emolument of exalted office for the purpose of "fixing" actions or proceedings pending or assigned to other jurists or other courts however communicated.

(5) As part of such "fixing" operation there is the conspired and coordinated thrust upon the courts perjurious and misleading statements, void orders, decrees, decisions and/or opinions, and the stonewalling of pre-trial procedures.

AS AND FOR A FIRST CAUSE OF ACTION
(EQUITABLE RELIEF)

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

6a. Plaintiff, on January 23, 1990, executed a Verified Complaint which, in due course, was filed in this Court and assigned Docket No. HAR 90-322.

b. The only defendant in such action was F&D, the Complaint was based upon a fidelity bond F&D had issued wherein plaintiff, and those similarly situated, were to be financially assured of the faithful performance in office of Feltman, as a court-appointed receiver, for the judicial trust assets of PUCCINI CLOTHES, LTD. ["Puccini"] -- the "judicial fortune cookie".

c. WT&P was selected by F&D to represent it in that action.

d. With dramatic, albeit brief and concise, specifics, plaintiff's complaint set forth the treacherous conduct of Feltman, and some of his co-conspirators, including K&R and FKM&F, whereby all of Puccini's judicial trust assets were made the subject of larceny and unlawful plundering, leaving nothing for the legitimate stockholders and creditors.

e. Plaintiff also named some of the members of the judiciary who Feltman and his criminal entourage had corrupted, knowledge of which, ante litem motam, was already known to F&D.

7a. Also on January 23, 1990, plaintiff caused to be executed another Verified Complaint which, in due course, was filed in the U.S. District Court for the Western District of Washington, and assigned Docket No. 90 CV 129 [WD].

b. The only defendant in such action was General, and the Complaint was based upon a fidelity bond General had issued wherein plaintiff was assured of the faithful performance by Sapir, as a trustee in bankruptcy.

c. SFC&S were selected by General to represent it in that action.

d. This verified complaint, as here relevant, alleged:

> "Puccini was involuntarily dissolved by a state court on June 4, 1980 and Feltman was its court-appointed receiver.
>
> 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.
>
> 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.
>
> 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.
>
> 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 soft ware', and 'inventory his property', criminal extortion, and similar racketeering activities.

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

8a. In support of summary dismissal motions made by WT&P and SFC&S, operating in conspiratorial consort with each other and others, they inundated the respective courts, with various orders, decrees, decisions and/or opinions purportedly as valid which, for various legal reasons, plaintiff asserted and contended were null, void and of no legal effect.

b. Independently of plaintiff's assertions WT&P and SFC&S knew, when they inundated the respective courts with such orders, decrees, decisions and/or opinions that they knew were null, void and of no legal effect, and were committing a fraud upon the courts thereby.

9. By reason of the aforementioned, WT&P, SFC&S, F&D, and General are judicially estopped from opposing, in this action, a due process judicial determination, giving rise to a res judicata determination of the legal validity, vel non, of such orders, decrees, decisions and/or opinions which they thrust on their respective courts.

AS AND FOR A SECOND CAUSE OF ACTION
(DAMAGES)

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

11. The aforementioned orders, decrees, decisions and/or opinions were thrust upon the courts by WT&P and SFC&S with the knowledge that same were null, void and/or no legal effect, pursuant to a conspiratorial scheme with, inter alia, FKM&F and K&R -- "the criminals with law degrees".

12a. For the purpose of consummating such conspiratorial judicial frauds, WT&P and SFC&S, both moved to stay discovery and disclosure, while simultaneously moving for summary dismissal, relying in whole or in essential part for their summary dismissal motions, on the validity of such orders, decrees, decisions and/or opinions.

b. In addition thereto, and for the purpose of consummating such judicial frauds, WT&P, SFC&S and others induced Judge Dwyer and Judge Hargrove, by means and methods which deprived plaintiff of due process, to avoid litigating the validity of such orders, decrees, decisions and/or opinions.

13. By reason of the aforementioned conspiratorial actions, which deprived plaintiff of his constitutional and/or federal rights, plaintiff has sustained substantial monetary damages, racketeering and otherwise, for which WT&P, SFC&S, F&D, General, Feltman, FKM&F, K&R, Citibank and Sapir, are liable jointly and severally.

AS AND FOR A THIRD CAUSE OF ACTION
(DAMAGES)

14. Plaintiff repeats, reiterates and realleges each and every allegation of the complaint marked "1" through "13" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges.

15a(1) In blatant disregard of Rule 56[e] of the Rules of Civil Procedure, with knowledge that same was being blatantly violated, in conspiratorial consort with "the criminals with law degrees", the entire summary judgment motion by WT&P was based its own statements, affidavits, and affirmations, wherein it had no personal knowledge.

(2) To the extent that WT&P had "hearsay" knowledge from the files of its client and from other sources, WT&P knew that its assertions were false, contrived, fabricated, deceptive and/or misleading.

b(1) In blatant disregard of Rule 56[e] of the Rules of Civil Procedure, with knowledge that same was being blatantly violated, in conspiratorial consort with Sapir and others, almost the entire summary judgment motion by SFC&S was based on its own statements, affidavits, and affirmations, wherein it had no personal knowledge.

(2) To the extent that WT&P had "hearsay" knowledge, from Sapir and from other sources, SFC&S knew that its assertions were false, contrived, fabricated, deceptive and/or misleading.

(3) For the SFC&S motion, they prepared an affidavit for Sapir to execute, which they knew was misleading and deceptive, submitted same to the Court, and further expanded on such deception by its own false and misleading statements, affidavits, and affirmations.

(4) Sapir was made aware of such continuing judicial deception by being served with copies of the papers submitted by SFC&S -- according to SFC&S.

16a. WT&P, SFC&S and their co-conspirators, thereupon informed those who had been served with plaintiff's Rule 31[a] questions that they should and need not respond to plaintiff's questions because motions for a stay of disclosure and discovery had been made.

b. WT&P and SFC&S, in making such stay motions, were particularly interested in not having F&D and Sapir not respond to plaintiff's Rule 31[a] questions, since they knew that such, and similar Rule 31[a] answers would expose their false and perfidious submissions to the courts.

c. Particularly under the aforementioned circumstances, the aforementioned scenario was manifestly in violation of Rule 56[f], and also unconstitutional, as WT&P, SFC&S, and their co-conspirators actually knew.

17. The aforementioned, without due process, scams by WT&P and SFC&S, received the unlawful cooperation of Judge Hargrove and Judge Dwyer.

a(1) Plaintiff had until April 2, 1990 to oppose the WT&P motion to stay disclosure and discovery.

(2) Such April 2, 1990 date in order to oppose such WT&P motion to stay disclosure, plaintiff confirmed with WT&P and with the Court.

(3) WT&P and the Court actually knew that plaintiff was intending to oppose such motion for a stay of discovery and disclosure.

(4) Notwithstanding the aforementioned, Judge Hargrove, on March 29, 1990, on an ex parte basis, suspended plaintiff's pending demands for pre-trial discovery and disclosure, and granted other relief requested by WT&P.

(5) Such Order of March 29, 1990, which stayed disclosure, discovery and other relief, lacked due process within the meaning of Dennis v. Sparks (supra), was rendered through fraud, deception and chicanery, and consequently null, void and of no legal effect, giving rise to a claim of damages in favor of plaintiff.

b(1) In the SFC&S scam while, by self-help, stonewalling disclosure, caused the dismissal of plaintiff's claim before the stay motion was submitted.

18. By reason of the aforementioned, plaintiff demands damages against WT&P, SFC&S, F&D and General, and its co-conspirators.

AS AND FOR A FOURTH CAUSE OF ACTION
(DAMAGES)

19. Plaintiff repeats, reiterates and realleges each and every allegation of the complaint marked "1" through "18" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges.

20a. Excepting any inconsistent obligations to the courts, WT&P and SFC&S owed the clients they represented in the respective actions their undivided loyalty.

b. Any other interests that WT&P and SFC&S may have had, particularly if they conflicted with the legitimate interests of their clients, triggered an obligation of disclosure to the courts and to plaintiff.

c. Courts are not the private playgrounds of WT&P and SFC&S, or their undisclosed principals, in order to commit their frauds or cause the needless expenditure of judicial resources.

21a. In view of the allegations of the complaint, the knowledge of WT&P, SFC&S, F&D and General of the underlying facts, the only legal and ethical course that could be pursued by WT&P and SFC&S was to interplead Feltman and/or his co-conspirators, which included Citibank -- a "deep pocket indemnitor".

b. With Feltman and/or his co-conspirators impleaded, F&D and General could effectively "walk-away" from plaintiff's actions, without incurring any further legal expense.

c. The courts would also, with Feltman and his co-conspirators impleaded, be spared a great deal of time, effort and expense.

d. To insure that WT&P and SFC&S had actual knowledge of their legal and ethical obligations in this respect, plaintiff set same forth, in the most explicit language, which neither WT&P nor SFC&S disputed in any respect.

22a. However, instead of impleading Feltman and his co-conspirators, WT&P and SFC&S agreed to participate in a conspiratorial scenario, which they knew was a perversion of justice and an abuse of the machinery of justice.

b. In short, WT&P and SFC&S agreed to participate in a judicial fraud, a fraud whose operation was contrary to the legitimate interests of the court and their clients.

23a. The modus operandi of K&R and FKM&F -- "the criminals with law degrees" -- and their co-conspirators, judicial and otherwise, which WT&P and SFC&S now agreed to be participants, was to stonewall discovery and disclosure, while thrusting upon the court perjurious statements and void orders.

b. Concomitantly, directly and/or indirectly, their cadre of corrupt judges, officials, and/or politicians would engage in their "fixing" operation.

24. Plaintiff had, from past experience, from the remarks of the "criminals with law degrees" and their co-conspirators, and from confidential sources, become well-versed in the modus operandi of these corrupt scenarios, and its several variants.

25a. In the Maryland and Washington actions, although the complaints were contractually based, where plaintiff's reputation was not an issue, despite established law, both WT&P and SFC&S leveled an ad hominem attack on plaintiff's reputation.

b. In each action, where impleading was legally and ethically mandated, neither WT&P and SFC&S employed such procedure and thus violated their legitimate obligations to the court and their client.

c. In each action, a motion was made for summary dismissal, based upon the "hearsay" statements of the attorneys representing F&D or General, in manifest violation of Rule 56[e].

d. In each action, WT&P and SFC&S, thrust upon the court orders which they actually knew were void, wholly irrelevant, and/or inadmissibly inflammatory.

e. In each action, WT&P and SFC&S, simultaneously with their summary dismissal motion, moved to stay discovery and disclosure which would, inter alia, if not granted would reveal their statements false and deceptive and/or the tendered orders to be sham.

f(1) Consequently, in each action, plaintiff amended his complaint, as of course, which as every attorney knows moots the dismissal motion, except in situations not here relevant.

(2) In Neitzke v. Williams, 490 U.S. , 109 S.Ct. 1827 [1989], Mr. Justice Marshall, speaking for a unanimous court, as a matter of clearly established legal principle, stated (, 1834):

> "Under Rule 12(b)[6], a plaintiff with an arguable claim is ordinarily accorded notice of a pending motion to dismiss for failure to state a claim and an opportunity to amend the complaint before the motion is ruled upon."

(3) However, in each case, WT&P and SFC&S ignored the existence of the Amended Complaint and/or absurdly asserted that a ruling be made on the original, but mooted, complaint as dispositive of the action.

g. In each case there was clear evidence that there had been communications with unidentified persons in the New York area, who were orchestrating these judicial scenarios.

h. In each case there was clear evidence that the jurist involved had been corrupted and/or compromised with the intent of denying plaintiff due process.

26. The testimony, submissions, and conduct of WT&P and SFC&S was pursuant to a conspiracy with, inter alia, each other, "the criminals with law degrees" and/or others to inundate the forum with false and deceptive testimony and/or submissions, without affording plaintiff an opportunity to properly respond, by means and purposes constituting a fraud upon the courts, and/or denying plaintiff due process and other constitutional or federal legal rights.

27a. In the action against General, although SFC&S prepared a knowingly deceptive affidavit for Sapir to execute, under a conspiratorial scenario, the essential assertions and contentions were falsely made by SFC&S, who had no testimonial knowledge of the matters in issue, except that their assertions were false and misleading.

b. In order to insure that decisive testimony and evidence would be produced and expose such perfidious conduct, SFC&S also moved to stay discovery and disclosure.

c. With clear indications of a "fix" with Judge Dwyer, plaintiff amended his complaint as of course, which amended complaint foreclosed the consummation of such intended "fix".

d. SFC&S and Judge Dwyer ignored the existence of the Amended Complaint and dismissed plaintiff action with Rule 11 compensatory costs.

e. Plaintiff demanded to see the evidence in support of SFC&S demand for compensatory Rule 11 costs, which were of an unliquidated amount, including their time sheets, since they alleged that such time sheets were the basis for the major portion of the amount demanded, and a trial on the issue on these patently exaggerated costs.

f. Judge Dwyer, denied both requests, and entered judgment against plaintiff for the amount requested by SFC&S based upon such 'phantom' documentation.

g. In Davis v. Fendler (650 F.2d 1154, [9th Cir.-1981]), the Court stated (at p. 1161):

> "It is well settled that a default judgment for money may not be entered without a hearing unless the amount claimed is a liquidated sum or capable of mathematic calculation."

h. In the Washington action, even the evidence for the amount of costs awarded, was exhibited neither to the Court nor plaintiff, despite plaintiff's demand.

28a. Furthermore, to prejudice plaintiff's appellate rights, papers submitted by plaintiff to the Clerk for filing and consideration, were not filed until approved by Judge Dwyer, which generally was weeks later.

b. At times, Judge Dwyer rejected plaintiff's submitted papers, and they were not filed.

29a. In the Maryland action, this conspiratorial fraud has not been consummated to finality, however the fact remains that WT&P has still not responded to the Amended Answer, although seven (7) weeks have elapsed since its service.

b. The fact also remains that although each and every order, decree, decision and/or opinion thrust upon the Court by WT&P have been shown in the Amended Complaint and elsewhere, beyond a peradventure of a doubt, to be void, WT&P still relies on them for the summary dismissal of the original, but mooted, complaint.

c. WT&P seeks success for F&D by "fixes" engineered by "the criminals with law degrees", and their cadre of corrupt judges, rather than impleader.

30. By reason of the aforementioned, damages is demanded against all the defendants, all co-conspiring racketeers.

AS AND FOR A FIFTH CAUSE OF ACTION
(EQUITABLE RELIEF)

31. Plaintiff repeats, reiterates and realleges each and every allegation of the complaint marked "1" through "30" inclusive, with the same force and effect as though more fully set forth at length herein, and further alleges.

32. In addition to the conspiratorial attempt to deprive plaintiff of discovery and disclosure; (1) without any claim of right Dillon unlawfully holds some of his essentially needed papers, documents and 'data discs'; (2) plaintiff is physically excluded from the courtroom of Referee Diamond, where he keeps concealed or destroys public documents and records needed by plaintiff; and (3) Chief Judge Brieant and Judge Politan, without any due process procedures or legitimate reason therefore has excluded plaintiff from the federal building at 101 East Post Road, White Plains, New York, which building contain many documents needed by plaintiff.

33a. The assets of Puccini, a constitutional person, are held under "color of law", and although an accounting must be filed "at least once a year", in the more than ten (10) years since Puccini was involuntarily dissolved, not a single accounting has been filed.

b. Abrams is the statutory fiduciary, and Wachtler, the state judicial CEO, have the constitutional responsibility to assure that the constitutional and federal legal rights of Puccini are observed.

34. Respect for those constitutional and federal legal rights of Puccini must be mandated of them and all other state officials.

WHEREFORE, it is respectfully prayed that plaintiff be awarded racketeering and other damages in the sum of $500,000,000, together with interest, costs and disbursements, an adjudication of the validity of the orders, decrees, decisions and/or opinions issued by some of the defendants and their courts, together with such other, further and/or different relief as to this Court may seem just and proper in the premises.

Dated: July 13, 1990

Yours, etc.

GEORGE SASSOWER
Attorney for plaintiff
Pro se

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

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

Dated: July 13, 1990

_____
GEORGE SASSOWER