

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----x
GEORGE SASSOWER, individually, and those
similarly situated or to be benefited
thereby, including Puccini CLOTHES, LTD.,
Petitioner,

Index No.

-against-

Hon. XAVIER C. RICCOBONO, individually
and as Administrative Judge of the
Supreme Court of the State of New York,
County of New York; Hon. IRA GAMMERMAN;
Hon. ALVIN F. KLEIN; Hon. MICHAEL J.
DONTZIN; Hon. MARTIN B. STECHER;
Hon. DAVID B. SAXE; Hon. WALTER M.
SCHACKMAN; Referee DONALD DIAMOND;
Hon. FRANCIS T. MURPHY, individually and
as Presiding Justice of the Supreme Court
of the State of New York, Appellate
Division, First Judicial Department;
Hon. THEODORE R. KUPFERMAN; Hon. JOSEPH
P. SULLIVAN; Hon. BENTLEY KASSAL; Hon.
DAVID ROSS; Hon. ERNST H. ROSENBERGER;
Hon. ROBERT ABRAMS; DAVID S. COOK, Esq.;
RICHARD G. LISKOV, Esq.; SHERIFF OF THE
CITY OF NEW YORK; SHERIFF OF THE COUNTY OF
NASSAU; and GRIEVANCE COMMITTEE FOR THE
SECOND AND ELEVENTH JUDICIAL DISTRICTS,
Respondents.

-----x
S I R S:

PLEASE TAKE NOTICE, that upon the annexed
petition of GEORGE SASSOWER, Esq., duly verified the
10th day of October, 1985, and upon the all the
pleadings and proceedings had herein, the undersigned
will move this Court at a Special Term Part I, held at
the Supreme Court of the State of New York, County of

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Kings, held at the Courthouse thereof, Civic Center, 360 Adams Street, in the Borough of Brooklyn, City and State of New York, on the 15th day of November, 1985, at 9:30 o'clock in the forenoon of that day or as soon thereafter as Counsel may be heard for an Order directing the respondents to give obedience to the constitutional equal protection provisions, declaring null and void all proceedings related to Puccini Clothes, Ltd., since January 9, 1984, and/or a hearing with respect to the aforementioned, together with any other, further, and/or different relief as to this Court may seem just and proper in the premises.

PLEASE TAKE FURTHER NOTICE, that answering papers, if any, are to be served upon the undersigned at least five (7) days before the return date of this proceeding, with five days additional if service is by mail.

Dated: October 10, 1985


Yours, etc.,

GEORGE SASSOWER, Esq.
2125 Mill Avenue,
Brooklyn, New York, 11234
(718) 444-3403

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-----X
TO THE HONORABLE JUSTICES OF THE SUPREME COURT OF THE
STATE OF NEW YORK : COUNTY OF KINGS

Petitioner respectfully shows this Court
and alleges:

1a. Petitioner, by this petition, respectfully requests that this Court issue an Order directing the respondents to give obedience to the "equal protection" provisions of the Constitution of the United States (Amendment XIV) and Constitution of the State of New York (Article 1, §11), and other fundamental rights, including free speech and right to unbridled access to the press.

b. For the manifest violation of same, petitioner requests, that all proceedings relating to Puccini Clothes, Ltd. ["Puccini"], since January 9, 1984, be declared null and void.

c. This proceeding is brought in conjunction with an action for damages, under the aegis of a summons and complaint dated October 8, 1985, involving the same parties, and is incorporated herein by reference.

2a. Puccini, was dissolved on June 4, 1980, wherein its assets and affair becoming custodia legis.

b. During the first 20 months, its assets were the subject of massive larceny, under the engineering of Kreindler & Relkin, P.C. ["K&R"], which larceny was concealed by that firm by its perjurious submissions, aided and abetted by others, including the a thereafter appointed Receiver, Lee Feltman, Esq. ["Feltman"] and his usurper (22 NYCRR §660.24) law firm, Feltman, Karesh & Major, Esqs. ["FK&M"].

3a. The statutory scheme, contained in the Business Corporation Law, makes the Attorney General the statutory watchdog of the assets and affairs of such involuntarily dissolved corporation, with mandatory and discretionary provisions contained therein. In addition thereto, the Attorney General has general investigative and prosecutorial powers.

b. The initial documentary evidence that such larceny, perjury, and corruption had taken place, surfaced in November 1983, with deponent credited for such disclosure.

c. The following letter was written and personally served on January 9, 1984:

"Hon. Robert Abrams
Attorney General of the State of New York
2 World Trade Center,
New York, New York, 10047

Re: Puccini Clothes, Ltd.

Honorable Sir:

Enclose please find Notice of Motion in the above matter, which is self-explanatory.

The matter will be on for a hearing at Trial Term Part 10 in Supreme Court, New York County, on January 11, 1984 at 9:30 a.m. I suggest that you be present to set forth your position in this matter (Barr v. Puccini Clothes, Ltd.).

To be explained, on another day, is the inactivity of your office after actual notice was given of the larceny of this involuntarily dissolved corporation and while its affairs and assets were in the custody of the court.

Now for concealing such larceny for a period of almost two (2) years the Receiver's Law Firm desires legal fees for almost consistently taking a position contrary to the interests of their trusts!

If your office has no intention of protecting the interests of those who have not, or have not, been permitted to intervene, I believe the record should so indicate.

Very truly yours,

GEORGE SASSOWER"

d. Senior Assistant Attorney General David S. Cook, Esq. ["Cook"], personally responded, he being the one-man unit in the Attorney General's Office, assigned to vouchsafe the assets and affairs on behalf of the dissolved corporation and those interested in same.

e. As set forth in such damage suit action, Cook has continuously remained in such one-man unit as Puccini's statutory watchdog, and thereafter was "commandeered" and "assigned" to represent those who were aiding and abetting and becoming involved in the the unlawful concealment of such criminal conduct.

f. In undertaking to represent interests adverse to Puccini, Cook took with him the confidential information he had obtained from petitioner, others, and his peculiar knowledge he had on the subject!

4a. The confidential information given to Cook by petitioner and others is constitutionally protected by the United States Constitution (Amendment I, XIV) and New York State Constitution (Article 1, §9).

Article 1, §9 of the New York State Constitution, grants to all the right:

"to petition the government, or any department thereof".

b. It takes a remarkable base view of judicial and professional ethics to recognize that the Hon. Robert Abrams ["Abrams"] and the judiciary would, by an ad hoc change in procedure in the Attorney General's Office, "hijack" Cook so that he exclusively represents all judicial members, while he simultaneously represents Puccini and other involuntarily dissolved corporation, receiving confidential information on their behalf!

c. Obviously and exclusively, Cook advances the interests of highly vocal judicial clients, while he has abandoned the rights of his judicially created eunuchs, albeit the mandate of statute.

d. Thus, for example although Puccini was involuntarily dissolved on June 4, 1980, more than five (5) years ago, and has not accounted since that time, Mr. Cook has not demanded an accounting, final nor intermediate, nor joined in any such application when made.

Thus, although Mr. Cook has in his possession uncontrovertible documented evidence of massive larceny of Puccini's judicial entrusted assets, perjurious statements emphatically denying same, or concealing such conduct, he is now operating in concert with them, because as Cook says, he was "commandeered" and "assigned" to such role!

Abrams and some members of the judiciary are creating their own modern-day version of "Judas Iscariot" and have David S. Cook, Esq., playing that role.

5a. Essentially because petitioner will have nothing to do with larceny, perjury, and corruption, judicial and otherwise, he has become the object of governmental prosecution.

b. Since on his own behalf, on behalf of his client and Puccini, he conveyed a great deal of confidential information on the matter, he, not the culprits, has become the subject of prosecution and persecution, where the Constitution of the United States and about every fundamental law thereunder has been jettisoned.

6a. With this background, nisi prius, per Gammerman, J., under a corruptly secured order, obtained by those who were involved in the larceny, perjury, and corruption, wherein petitioner has effective confessions, enjoined petitioner from communicating with a "professional disciplinary or grievance committee" with regard to their conduct!

b. Petitioner, was convicted, sentenced, and incarcerated under two orders of non-summary criminal contempt, without a trial or other fundamental rights, despite Bloom v. Illinois (391 U.S. 194). Without question, the alleged violation of the Order of Mr. Justice Gammerman, was pre-text!

c. Sam Polur, Esq., was also convicted, sentenced, and incarcerated based upon the uncorroborated affidavit of Donald F. Schneider, Esq., that Mr. Polur served a summons on him, allegedly in violation of the same order of Mr. Justice Gammerman. Although it was thereafter proclaimed that Mr. Polur did not serve that summons, and such assertion went undenied by Mr. Schneider and his co-conspirator, Michael J. Gerstein, Esq., Mr. Polur was not released, but was compelled to serve the balance of his term (cf. Brady v. Maryland, 373 U.S. 83).

Instructively, Mr. Cook, who was present at the time of such service of said summons does not recall who served same, and does not recall the "long speech" assertedly given by Mr. Schneider at the time of such service, a "sermon" that would have been remembered had it been given!

Mr. Raffe, made the subject of barbaric treatment for several months, including "stalking the prey", by the Sheriff with threats that he would be incarcerated if he does not settle the underlying civil litigation has apparently finally succumbed. For succumbing in the civil litigation, he now probably will not have to be incarcerated for the alleged criminal conduct wherein he was also convicted and sentenced to be incarcerated without a trial.

No longer will Mr. Raffe's family be visited by Deputy Sheriffs and they advised that unless he settles the civil litigation he will be incarcerated!

No longer will Referee Donald Diamond sua sponte, in his "non-public courtroom" tell Mr. Schneider to submit an affidavit so that he can impose a judgment upon Mr. Raffe for about \$200,000, without a summons, motion, or anything else!

No longer will Mr. Raffé have to concern himself with Referee Diamond secreting or destroying his judicial papers that do not meet Diamond's fancy, or have to face his recommendations for herculian fines and penalties in Diamond's in absentia proceedings!

7a. Petitioner has made it eminently clear that he does not compound crimes and does not negotiate on the basis of same!

b. There is no chance that incarceration, past or threatened for the future, will not change petitioner's views!

8. Ironically, the very fact that such unconstitutional and barbaric procedures have been employed against petitioner, and those believed associated with him, has convinced and excited many regarding the unrevealed information which petitioner has in his possession!

9a. One need not be a judge to know that as a matter of federal ministerial compulsion, no american judge can convict, sentence, and incarcerate, absent a plea of guilty, including for non-summary criminal contempt, without a trial with its right to confront and produce witnesses on the accused's behalf (Bloom v. Illinois, supra; Amendment VI, XIV of the United States Constitution).

b. The aforementioned was the ministerial compelled limitation on the state judiciary (Article 1, §6 New York State Constitution), prior to Pointer v. Texas (380 U.S. 400).

c. Legal misconduct, of criminal magnitude, and judicial improprieties has not become the "supreme law of the land" (Article VI [2] of the United States Constitution), nor may some members of the judiciary act as if it had.

10a. These "sham" convictions were obviously intended in part to eliminate petitioner as an attorney.

b. Respondent, Grievance Committee, and its attorney, unquestionably recognize that the aforesaid convictions are "void"; unquestionably recognize that the corruptly secured Order of Mr. Justice Gammerman violates Disciplinary Rule 1-103; unquestionably recognize their obligation to remove all barriers which prevent one from communicating with them; and unquestionably recognize their obligation to report and investigate those charged with larceny, perjury, and corruption; and unquestionably recognize that the Order of Mr. Justice Rettinger and Mr. Justice Sinclair was secured by fraud and perjury, which petitioner cannot advise the Grievance Committee about; and other matters.

c. Nevertheless, the Grievance Committee and its attorney, acting in concert with those who clearly transgressed the criminal and ethical code have sought to prosecute petitioner based merely on the aforementioned "void" convictions, which they know are "void".

d. Having chosen to recognize such convictions, they must recognize their "perjurious equivolence" and comply with Brady v. Maryland (supra) and their Berger v. United States (295 U.S. 78) obligations.

e. Certainly, the Grievance Committee and its attorney cannot blithely disregard, as they have, the United States v. Agurs (427 U.S. 97) demand!

Since petitioner has ignored petitioner's demand, he will do so directly himself!

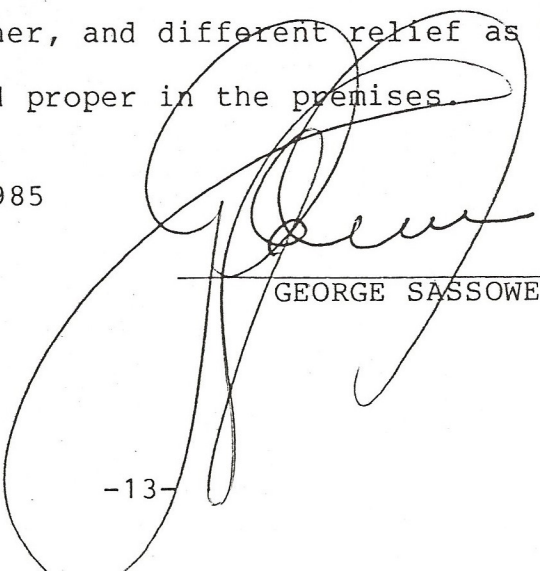
f. Nor, may the petitioner, on information and belief, on the hope of finding something, order an investigation of petitioner!

g. In short -- the Grievance Committee and its attorney will obey, like the other respondents, constitutional values, and not selectively prosecute or impair the petitioner's constitutional right to freely speak and publish, unrestrained by threats and intimidation!

h. Petitioner waives his right of confidentiality by bringing this proceeding.

WHEREFORE, petitioner respectfully prays that this petition be granted in all respects, together with any other, further, and different relief as to this Court may be just and proper in the premises.

Dated: October 10, 1985

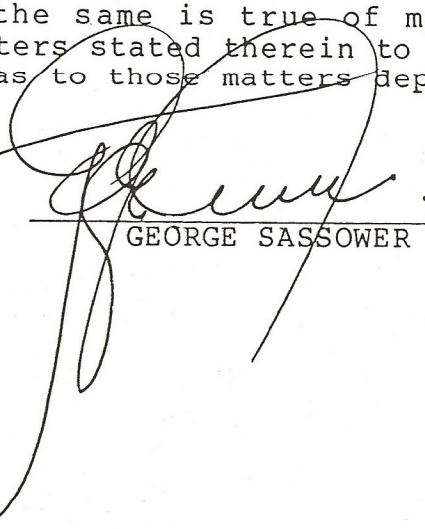


GEORGE SASSOWER

STATE OF NEW YORK)
CITY OF NEW YORK) ss.:
COUNTY OF KINGS)

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

I am the plaintiff herein and have read the foregoing petition and the same is true of my own knowledge except as to matters stated therein to be on information and belief, and as to those matters deponent believes them to be true.



GEORGE SASSOWER

Sworn to before me this
10th day of October, 1985



KENNETH SILVERMAN
Notary Public, State of New York
No. 24-4608988
Qualified in Kings County
Commission Expires March 30, 19 87