

No.

In the

SUPREME COURT OF THE UNITED STATES
October Term, 1989

-----x
In the Matter of the Petition of

GEORGE SASSOWER,

Petitioner,

-against-

LEE FELTMAN, individually and as Receiver for
PUCCINI CLOTHES, LTD.; KREINDLER & RELKIN, P.C.;
JEROME H. BARR; CITIBANK, N.A.; FELTMAN, KARESH,
MAJOR & FARBMAN; NACHAMIE, KIRSCHNER, LEVINE &
SPIZZ, P.C.; EUGENE DANN; ROBERT SORRENTINO;
RASHBA & POKART; IRA POSTEL; ROBERT ABRAMS, and
HYMAN RAFFE,

Respondents.

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x-----x
PETITION FOR CERTIORARI
to the
APPELLATE DIVISION OF THE SUPREME COURT OF THE
STATE OF NEW YORK : FIRST JUDICIAL DEPT.
x-----x

x-----x

PETITION

x-----x

GEORGE SASSOWER
Attorney for Petitioner,
Pro se
16 Lake Street,
New York, New York 10603
914-949-2169

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PRELIMINARY STATEMENT

1a. This petition for a Writ for Certiorari should be considered by this Court in conjunction with a Writ for Certiorari to the same Court which should be filed within the next ten (10) days, along with a consolidation motion.

b. This petition should also be considered, in tandem, with Writs for Certiorari by the same petitioner to the Circuit Courts of Appeal for the Second and Third Circuit, already filed and to be shortly filed.

2a. Judicial corruption, with direct judicial involvement, insofar as the judicial trust assets of PUCCINI CLOTHES, LTD. ["Puccini"] are concerned, originated in the Supreme Court of the State of New York, County of New York, a judicial forum administered by Administrative Judge XAVIER C. RICCOBONO ["Riccobono"].

b. Such judicial corruption then metastasized to the nisi prius and appellate courts in the Second Circuit, and then to the Third Circuit.

3a. Judicial corruption in the Puccini matter is an administrative process.

b. There are no trials, no hearings, simply endless ukases which form the fundamental building blocks of judicial determinations.

4a. The extensive corruption, judicial and official, can be immediately halted and terminated by the filing of an 'accounting' for Puccini, which was involuntarily dissolved more than nine (9) years ago.

b. In every American jurisdiction, a court-appointed receiver must file an 'accounting', a requirement that may not be waived, excused, or enjoined.

c. In New York, such 'accounting' must be filed "at least once a year" (22 NYCRR §202.52(e)), but although Puccini was involuntarily dissolved on June 4, 1980, not a single accounting has ever been filed.

5a. Such dereliction could not have occurred, had Hon. ROBERT ABRAMS, the Attorney General of the State of New York and the statutory fiduciary, fulfilled his mandatory statutory "duty" which inter alia, requires him to make application for the settlement of such filed accounting and distribution of its assets after the expiration of eighteen (18) months (N.Y. Bus. Corp. Law §1216(a)).

b. However, notwithstanding this statutory mandatory "duty", in the one hundred eleven (111) months that have elapsed, not a single application has been made for such accounting.

QUESTIONS PRESENTED

1. In view of Article 1, §10[1] of the United States Constitution, prohibiting the states from "impairing the obligations of contracts" may a state court, by legislative ukase, condition the payment and satisfaction of petitioner's contractually-based money judgment against PUCCINI CLOTHES, LTD. ["Puccini"] by compelling him to file:

"discontinuances with prejudice of all outstanding judicial and administrative proceedings and lawsuits brought by or on behalf of"

(a) petitioner; (b) members of his family; (c) all his clients,

"including but not limited to Harold Cohen and Dennis Vilella"

against:

"Lee Feltman, Esq., individually or as the Receiver for Puccini Clothes, Ltd., Puccini shareholders Eugene Dann, Robert Sorrentino, Jerome H. Barr and Citibank, N.A. as co-executors of the Last Will of Milton Kaufman, Rashba & Pokart, Feltman, Karesh, Major & Farbman, Kreindler & Relkin, P.C., Nachamie, Kirschner, Levine & Spizz, P.C., Ira Postel, Esq., or any attorney, employee or agent of any of the aforesaid firms"?

2. May petitioner be constitutionally denied "standing", wherein he has vested interests, in such state judicial proceeding?

3. Does the command that, in order for petitioner to receive satisfaction of his judgment, he secure from those related or associated with him, "discontinuances with prejudice" of their claims, violate petitioner's constitutional right of free association?

4. Where Referee DONALD DIAMOND ["Diamond"] has transactionally involved himself in this criminal racketeering adventure concerning the larceny and plundering of Puccini's judicial trust assets, extortion and other criminal activities, including "approving" a phantom, non-existent, "final accounting", and where he has been sued by petitioner, members of his family and others associated with him, can Referee Diamond constitutionally serve as a judicial officer?

5. Where the purported judicial proceedings in the courtroom of Referee Diamond are closed to petitioner, members of petitioner's family, those associated with him, and where the judicial papers and records are privately kept by him, are those proceedings constitutionally invalid?

THE PARTIES

All the parties are included in the title. Their addresses are indicated on the Certificate of Service.

TABLE OF CONTENTS

Preliminary Statement	i
Questions Presented	iii
The Parties	iv
Table of Contents	iv
Table of Authorities	v
Opinions in the Court Below	1
Jurisdiction	1
Constitutional and Statutory Provisions	2
Statement of the Case	3
Reasons for a grant of a Writ of Certiorari	9

TABLE OF AUTHORITIES

<u>Atlantic Trust v. Chapman</u> 208 U.S. 360 [1908]	10
<u>Barrows v. Jackson</u> 346 U.S. 249 [1953]	9
<u>Bloom v. Illinois</u> 391 U.S. 194 [1968]	6
<u>Burns v. Ohio</u> 360 U.S. 252 [1959]	1
<u>Cohn v. Beneficial</u> 337 U.S. 541 [1949]	1
<u>Goodman v. State</u> 31 NY2d 381, 340 NYS2d 393, 292 NE2d 665 [1972]	10
<u>Hazel-Atlas v. Hartford</u> 322 U.S. 238 [1944]	9
<u>Herndon v. Lowery</u> 301 U.S. 242 [1937]	9
<u>Home Building v. Blaisdell</u> 290 U.S. 398 [1934]	9
<u>Nye v. U.S.</u> 313 U.S. 33 [1941]	6
<u>Powell, In re</u> 851 F.2d 427 [D.C. Cir.-1988]	9
<u>Prentis v. Atlantic Coast Line</u> 211 U.S. 210 [1908]	9

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OPINIONS OF THE COURT BELOW

The Order of the Court of Appeals, dated July 11, 1989 is "A-1". The Order of the Appellate Division, First Judicial Department, dated March 14, 1989 is "A-2".

JURISDICTION

1a. The Order of the New York Court of Appeals was rendered within ninety (90) days of the filing of this petition.

b. The jurisdiction of this Court is invoked under 28 U.S.C. §1257(a) and §1651.

2a. 28 U.S.C. §1257(a) provides:

"Final judgments or decrees rendered by the highest court of a state in which a decision could be had, may be reviewed by the Supreme Court by which a writ of certiorari ... where any title, right, privilege, or immunity is specially set up or claimed under the Constitution"

b. 28 U.S.C. §1651 provides:

"The Supreme Court and all courts established by Act of Congress may issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law."

3a. The order of the New York State Court of Appeals is "final" within the meaning of 28 U.S.C. §1257(a). (Burns v. Ohio, 360 U.S. 252 [1959], since the state courts have refused to accept petitioner's papers on the subject.

b. Notwithstanding petitioner's constitutionally vested interests in Puccini and its assets and affairs, his papers are not accepted *at nisi prius*, he is not permitted to participate in the proceedings, and he is not permitted to even witness same as a spectator.

c. When, on the appellate level, petitioner has attempted to inject himself where he is directly involved, he is denied "standing" (A-2).

4. Clearly, as to petitioner, there is "finality" (Burns v. Ohio, *supra*; Cohn v. Beneficial, 337 U.S. 541 [1949]).

CONSTITUTIONAL and STATUTORY PROVISIONS

1. Article 1, §10[1] of the United States Constitution provides that:

"No State shall ... make any ... Law impairing the Obligation of Contracts ..."

2. Article VI[2] of the United States Constitution provides that:

"This Constitution and the Laws of the United States which shall be made in Pursuance thereof; ... shall be the supreme Law of the Land; and the Judges in every State shall be bound thereby, any Thing in the Constitution or Laws of any State to the Contrary notwithstanding."

3. The First Amendment of the United States Constitution provides that:

"Congress shall make no law respecting ... abridging the freedom of speech ... or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances."

4. The Fourteenth Amendment, §1 of the United States Constitution provides that:

"All persons born ... in the United States ... are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws."

5. New York Judiciary Law §474 provides that:

"The compensation of an attorney or counsellor for his services is governed by agreement, express or implied, which is not restrained by law ..."

6. New York Business Corp. Law §1216(a) provides:

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

7. 22 NYCRR §202.52(e) provides that:

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

8. New York Business Corp. Law §1217 provides:

" (a) A receiver shall be entitled, in addition to his necessary expenses, to such commissions upon the sums received and disbursed as may be allowed by the court, as follows: (1) On the first twenty thousand dollars, not exceeding five percent"

STATEMENT OF THE CASE
'Greyford - N.Y.'

1a. Petitioner is a native born American and battle-starred veteran of World War II, who wants no part of, has resisted and exposed judicial corruption, and intends to continue his course of conduct irrespective of the personal consequences.

b. Petitioner's contractual-based interests, which respondents desire petitioner to "discontinue, with prejudice", as a condition for the satisfaction of his contractually-based money judgment include, inter alia:

(1) A wholly unsatisfied judgment against PUCCINI CLOTHES, LTD. ["Puccini"] in the sum of \$27,912.42, with interest from April 29, 1982.

(2) A filed claim against Puccini for the sum of \$3,000,000.

(3) An attorney's lien on the 25% stock interests of Raffé in the solvent Puccini, whose assets were made the subject of larceny and plundering by respondents to the point that nothing remains.

(4) An attorney's lien on a judgment in favor of Raffé against Puccini in the approximate sum of more than \$500,000, inclusive of interest.

(5) An attorney's lien on a claim in favor of Raffé against Puccini in the approximate sum of almost \$50,000, inclusive of interest.

(6) A legal and/or equitable lien on the stock interests in Puccini held by respondents 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 against them by Raffé.

2a. Puccini was involuntarily dissolved on June 4, 1980. Although the court-appointed receiver must file an accounting "at least once a year" (22 NYCRR §202.52[e]), in the more than nine (9) years that has elapsed, not a single accounting has been filed.

b. Respondent, Hon. ROBERT ABRAMS ["Abrams"], the Attorney General of the State of New York, is the statutory fiduciary for all involuntarily dissolved corporations, whose mandated "duties" include compelling the settlement of an "accounting", if not rendered within eighteen (18) months (N.Y. Bus. Corp. Law §1216[a]).

Although more than one hundred eleven (111) months have elapsed, not a single motion or proceeding has been initiated by the Attorney-General to compel such accounting.

c. The "final accounting" of the court-appointed receiver, LEE FELTMAN, Esq. ["Feltman"] which Referee Diamond "approved" on October 26, 1988, does not exist. It is "phantom".

d. The "approval" of such "final accounting" by Referee Diamond was with the implied consent of Abrams and a number of high-echelon members of the judiciary.

3a. Puccini's judicial trust assets were made the subject of massive larceny engineered by respondents KREINDLER & RELKIN, P.C. ["K&R"] and CITIBANK, N.A. ["Citibank"].

b. K&R thereafter entered into an unlawful agreement with Feltman, the court-appointed receiver, that if he would conceal such larceny and make no attempt at recovery on behalf of Puccini, the tangible balance of Puccini's judicial trust assets would be transferred to him.

c. Since Feltman's maximum compensation is determined by statute (NY Bus. Corp. Law §1217), which maximum cannot be ignored or waived by anyone, it was agreed that the transfer was to be made to respondents FELTMAN, KARESH, MAJOR & FARBMAN, Esqs. ["FKM&F"], instead of Feltman, although they did nothing to advance Puccini's interests.

d. Moreover, since FKM&F were not judicially appointed, and certainly not appointed pursuant to 22 NYCRR §660.24, they were not entitled to anything, even if they had performed valuable services for Puccini (22 NYCRR §660.24[f]).

e. In view of the aforementioned, Feltman can never render "an accounting" for Puccini, without exposing the criminal activities involved.

f. Instead, Feltman, FKM&F, K&R, and Citibank commandeered and enlisted a cadre of jurists and officials, federal and state, including Referee Diamond, subjecting petitioner and others to a 'reign of terror' in an attempt to compel plaintiff to succumb, relinquish his interests in Puccini, and submit to a code of silence.

g. Even those who were associated with petitioner, professionally or otherwise, who had no interest in Puccini, including DENNIS F. VILELLA ["Vilella"], were made the 'victims' of this 'reign of terror' in order to compel petitioner's submission in the Puccini matter.

4a. Included in this 'reign of terror' were trialess convictions with sentences of incarceration and/or monetary fines and penalties for non-summary criminal contempt, the mandates in *Nye v. U.S.* (313 U.S. 33) and *Bloom v. Illinois* (391 U.S. 194) to the contrary notwithstanding.

b. Even when the imposed substantial fines and penalties were made payable, in haec verba, "to the [federal] court", they were diverted into the private pockets of the 'judicial favorites', with the knowledge and implied consent of federal judges and officials.

c. Similar trialess convictions and sentences of incarceration were rendered by state jurists.

d. Petitioner and another served their terms of incarceration, while his client, HYMAN RAFFE ["Raffe"], succumbed.

According to the written agreement, as long as Raffe pays extortion monies to these 'judicial favorites', he will not be incarcerated.

e. According to the media, such extortion monies, paid to these 'judicial favorites' by Raffe, have now reached "more than \$2.5 million dollars" (N.Y. Village Voice, June 6, 1989; New Jersey Law Journal, July 13, 1989; and The Daily Tribune of Hibbing, Minnesota, June 18, 1989).

5. The aforementioned order of Referee Diamond exemplifies the 'economic terrorism' that petitioner has been subjected to in order to compel him to succumb, thus far without any success.

6a. There are no trials or hearings in the closed courtroom of Referee Diamond, wherein neither petitioner nor anyone associated with him, may participate or even witness.

b. Petitioner's legal papers are not accepted by Referee Diamond, even when he is properly served and a response is indicated.

c. There are no trials or hearings by Referee Diamond, simply ukases issued by him.

7a. The Order which was the subject of appellate review ("A-1" and "A-2"), "approved" a "final accounting" by the receiver for Puccini, when in fact no accounting existed.

b. As a reporter for United Press International, one from the New York Times, and others now know, there was and is no accounting filed. It is a non-existent, phantom and a fabricated fraud.

c. Included in such fraudulently approved, non-existent, "final accounting" is a provision reading, in haec verba, as follows:

"ORDERED, that the Receiver for Puccini Clothes, Ltd. shall in turn deposit such amount with the Clerk of the Court in full payment of the Judgment in favor of George Sassower and against Puccini Clothes, Ltd., subject to the further Order of this Court; and it is further

ORDERED that thereafter an application may be made to the undersigned [Referee DONALD DIAMOND] for an Order directing the Clerk of the Court to deliver the proceeds of the Judgment to George Sassower, by setting forth proof of the discontinuance with prejudice of all outstanding judicial and administrative proceedings and lawsuits brought by or on behalf of George Sassower, or any member of the family of George Sassower, of any person claiming to be a client of disbarred attorney George Sassower, including but not limited to Harold Cohen and Dennis Vilella, or in any instance where any summons, process or paper has been issued by disbarred attorney Sassower, as attorney, as attorney pro se, or as a party pro se, against any one or more of the following: Lee Feltman, Esq., individually or as the Receiver for Puccini Clothes, Ltd., Puccini shareholders Eugene Dann, Robert Sorrentino, Jerome H. Barr and Citibank, N.A. as co-executors of the Last Will of Milton Kaufman, Rashba & Pokart, Feltman, Karesh, Major & Farbman, Kreindler & Relkin, P.C., Nachamie, Kirschner, Levine & Spizz, P.C., Ira Postel, Esq., or any attorney, employee or agent of any of the aforesaid firms; ..."

c. Patently, neither Referee Diamond, an ex parte designee of Administrator Riccobono, nor any state official has the constitutional power, by administrative ukase to demand that petitioner "discontinue, with prejudice" his other claims, worth many times more than \$46,000, in order to have satisfied a contractual-based judgment which, with interest, amounts of \$45,717.40 (Article 1, §10[1] of the U.S. Constitution).

d. Additionally, for the same constitutional reason, and for destroying petitioner's First Amendment right of free association, Referee Diamond does not have the constitutional power to demand that petitioner secure "discontinuances, with prejudice" of the claims of (1) members of petitioner's family, and (2) his former clients.

REASONS FOR GRANTING THIS PETITION

1. The aforementioned administratively-imposed conditions (Prentis v. Atlantic Coast Line, 211 U.S. 210 [1908]) placed upon petitioner in order to satisfy his contractually-based money judgment, are transparently invalid as violative of, inter alia, Article 1, §10[1] of the U.S. Constitution, and should so be declared (cf. Home Building v. Blaisdell, 290 U.S. 398 [1934]).

2. The aforementioned administratively-imposed conditions placed upon petitioner in order to satisfy his money judgment, are transparently invalid as violative of, inter alia, petitioner's right of free association (Amendments I and XIV of the U.S. Constitution; Herndon v. Lowery 301 U.S. 242 [1937]).

3. Closed courtroom proceedings, exclusion of the petitioner as a participant and spectator, privately kept judicial documents, particularly where judicial trust assets are involved, are violative of "due process" (Amendment XIV of the U.S. Constitution).

4. Permitting members of the judiciary to contrive the fiction that petitioner lacks "standing" (Barrows v. Jackson, 346 U.S. 249 [1953]), where his constitutionally vested interests reveal otherwise, is abuse of power run amuck, and a subterfuge to deprive him of his constitutional right to access to the courts (In re Powell, 851 F.2d 427 [D.C. Cir.- 1988]).

4a. Judicial and official corruption, state and federal, which is now becoming a subject of media comment, cannot be permitted to remain uncorrected by this Court (Hazel-Atlas v. Hartford, 322 U.S. 238 [1944]).

b. The boasts of the firms of K&R and FKM&F that they control the judiciary, state and federal, nisi prius and appellate, is constitutionally unacceptable in a democratic state.

c. The sale of 'judicial indulgences' and the diversion of monies payable to the federal government and other sovereign powers for their own private benefit is both criminal and intolerable (Goodman v. State, 31 NY2d 381, 340 NYS2d 393, 292 NE2d 665 [1972]).

5. Finally, this Court must in crystal clear dramatic language state that a court-appointed receiver, an arm of the court (Atlantic Trust v. Chapman, 208 U.S. 360 [1908]), must account for his stewardship, an obligation which cannot be excused or waived.

Respectfully submitted,

George Sassower
GEORGE SASSOWER,
Petitioner, pro se.

CERTIFICATION OF SERVICE

On October 2, 1989, I served a copy of the within Petition for a Writ of Certiorari on LEE FELTMAN at 645 Fifth Avenue, New York, N.Y. 10022; KREINDLER & RELKIN, P.C., at 350 Fifth Avenue, New York, N.Y. 10118; JEROME H. BARR, at 342 Madison Avenue, New York, N.Y. 10017; CITIBANK, N.A., at 399 Park Avenue, New York, N.Y. 10022; FELTMAN, KARESH, MAJOR & FARBMAN, at 645 Fifth Avenue, New York, N.Y. 100022; NACHAMIE, KIRSCHNER, LEVINE & SPIZZ, P.C., at 342 Madison Avenue, New York, N.Y. 10173; EUGENE DANN, at 1051 Channel Drive, Hewlett Harbor, New York 11557; ROBERT SORRENTINO, at 21 Sue Ann Court, North Babylon, New York 11703; RASHBA & POKART, at 469 Seventh Avenue, New York, N.Y. 10018; IRA POSTEL, at 725 Fifth Avenue, New York 10022; ROBERT ABRAMS, at The Capitol, Albany, N.Y. 12224; and HYMAN RAFFE, at 2134 Pacific Blvd., Atlantic Beach, N.Y. 11509.

Elena R. Sassower
ELENA R. SASSOWER

State of New York,
Court of Appeals

At a session of the Court, held at Court of
Appeals Hall in the City of Albany
on the.....eleventh.....day
of.....July.....A. D. 19₈₉

Present, HON. SOL WACHTLER, *Chief Judge, presiding.*

1 Mo. No. 829 SSD 59
In the Matter of Jerome H. Barr
and Citibank, N.A., &c. Respondents,
Hyman Raffe, Respondent.
(George Sassower, Appellant.)

The appellant having filed notice of appeal in the above
title and due consideration having been thereupon had, it is
ORDERED, that the appeal be and the same hereby is
dismissed without costs, by the Court sua sponte, upon the ground
that no substantial constitutional question is directly involved.
Judge Bellacosa took no part.

Donald M. Sheraw
Donald M. Sheraw
Clerk of the Court

A-1

At a term of the Appellate Division of the Supreme Court
held in and for the First Judicial Department in the County of
New York, on March 14, 1989

Present—Hon. Francis T. Murphy, Presiding Justice
David Ross
E. Leo Milonas
Betty Weinberg Ellerin
Israel Rubin, Justices.

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

For the Dissolution of Puccini Clothes, Ltd.,
-and-

All Other Actions and Proceedings in any Court : M-748
Concerning Or Relating To Puccini Clothes, Ltd., :
Its Receiver Or Shareholders Or Their Attorneys. :

Hyman Raffe, :
Appellant. :

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An appeal having been taken to this Court by the above-named
appellant from an order of the Supreme Court, New York County, entered on
November 2, 1988,

And George Sassower having moved this Court for an order dismissing
the aforesaid appeal,

Now, upon reading and filing the papers with respect to said
motion, and due deliberation having been had thereon,

It is ordered that the motion to dismiss the appeal be and the same
hereby is dismissed for lack of standing.

ENTER:
FRANCIS K. GALDI
DEPUTY
Clerk.

A-2

No.
SUPREME COURT OF THE UNITED STATES
October Term, 1989

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GEORGE SASSOWER,

Petitioner,

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LEE FELTMAN, et al.,

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PETITION FOR CERTIORARI
to the
APPELLATE DIVISION: SUPREME COURT
STATE OF NEW YORK: FIRST DEPT.
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PETITIONER'S PETITION
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