

In The
SUPREME COURT OF THE STATE OF NEW YORK
October Term, 1990
No.

-----x
In re
GEORGE SASSOWER,
Petitioner-Appellant.
-----x

GEORGE SASSOWER,
Plaintiff,
-against-

CHARLES L. BRIEANT; NICHOLAS H. POLITAN;
16 LAKE STREET OWNERS, INC.; LAWRENCE J.
GLYNN; DENIS DILLON; WILLIAM C. CONNER;
EUGENE H. NICKERSON; ALVIN F. KLEIN;
DAVID B. SAXE; FRANCIS T. MURPHY; XAVIER
C. RICCOBONO; IRA GAMBERMAN; EDWARD
DIAMOND; HOWARD SCHWARTZ; JEFFREY
. SAPIR, and HAROLD JONES,
Defendants.
-----x

x-----x
PETITION FOR A WRIT OF CERTIORARI
TO THE CIRCUIT COURT OF APPEALS FOR THE
SECOND CIRCUIT
x-----x

x-----x
PETITION
x-----x

QUESTIONS PRESENTED

1. Where Chief Judge CHARLES L. BRIEANT ["Brieant"] of the Southern District of New York, in his administrative capacity, in December of 1987, without even the pretense of due process, (a) intruded upon the independent judicial bailiwick of another Article III judge and dismissed petitioner's action pending therein; then (b) intruded upon the judicial bailiwick of an Article I Judge and directed such judge to execute false papers closing out petitioner's bankruptcy proceeding; and (c) simultaneously attempted to immunize his actions by prohibiting the filing by petitioner of any complaint, motion or document

without judicial permission, must petitioner's petition herein be granted, petitioner's verified complaint ordered to be filed and the Administrator Brieant-created situation remedied judicially?

2. Must this petition be granted, petitioner's verified complaint ordered filed and the Administrator Brieant-created situation remedied judicially, where Administrator Brieant's "judicially intrusive", "no due process" actions were the result of (a) petitioner having "caught", once again, a "judicial fixing" operation by the admittedly disqualified U.S. District Court Judge WILLIAM C. CONNER ["Conner"]; (b) the exercise by petitioner of his right to amend his complaint, as of course, to include Judge Conner as a Dennis v. Sparks (449 U.S. 24 [1980]) co-defendant?

3. Where Administrator Brieant thereafter, in August 1989, again without any pretense of due process, issued an edict which permanently excluded petitioner from the Federal Building in White Plains, New York 10601, except by his permission or the permission of U.S. District Judge NICHOLAS H. POLITAN ["Politan"] of the District of New Jersey, must petitioner's petition herein be granted, petitioner's verified complaint ordered to be filed and the Administrator Brieant-created situation remedied judicially?

4. Must this petition be granted, petitioner's verified complaint ordered filed and the Administrator Brieant-created situation remedied judicially, where Administrator

Brieant's permanent physical exclusion edict followed newspaper and T.V. publication of petitioner's exposure of judicial misconduct and corruption?

5. Must this petition be granted, petitioner's verified complaint ordered filed and the Administrator Brieant-created situation remedied judicially, where Administrator Brieant's permanent physical exclusion edict followed petitioner's publication of Administrator Brieant's involvement, with Presiding Justice FRANCIS T. MURPHY ["Murphy"], in the larceny of the judicial trust assets of PUCCINI CLOTHES, LTD. ["Puccini"], criminal extortion and his involvement in "disguised nepotism"?

6. Where almost every local jurist is aware that Administrator Brieant is criminally involved with KREINDLER & RELKIN, P.C. ["K&R"] and FELTMAN, KARESH, MAJOR & FARBMAN, Esqs. ["FKM&F"] in the larceny of judicial trust assets, criminal extortion, and other racketeering activities, and these other jurists are constrained to act in order to advance Administrator Brieant's adventures, must petitioner's petitions be granted and the integrity of the machinery of justice restored?

7. Could Administrator Brieant, in his administrative capacity, lawfully intrude upon the independent judicial bailiwick of another Article III judge, and without notice, without opportunity to oppose, without any due process whatsoever, dismiss petitioner's action assigned to and pending before such other Article III judge?

8. Could Administrator Brieant, as part and parcel of such "no due process" edict, lawfully decree that any new action commenced by petitioner in the Southern District of New York would require prior judicial approval?

9. Could such prior judicial approval edict by Administrator Brieant be construed to include a proceeding to declare null and void the Judge Brieant "no due process" dismissal and the "prior judicial approval" edicts?

10. In view of the commerce clause, the privilege and immunities clause, the Fifth Amendment and/or other constitutional prerogatives, do each of the 94 district courts have the individual power to exclude certain individuals and/or types of claims, otherwise properly before such court from their obligation to adjudicate?

11. Could Administrator Brieant, the day following the dismissal edict, again without any due process procedures, effectively direct the U.S. Trustee, the Bankruptcy Trustee and the Bankruptcy Judge to execute false and deceptive judicial papers and close out petitioner's bankruptcy proceeding, also without due process?

12. Could Administrator Brieant, as part of such "no due process" edict, also lawfully decree that petitioner was not to file any papers in such bankruptcy proceeding without prior judicial consent?

13. Could such "prior judicial approval" decree by Administrator Brieant be construed to include a F.R.Civ.P. Rule 60(b)[4][6] motion and/or action [Bankruptcy Rule 9024]?

14. Could Administrator Brieant thereafter, with no judicial proceedings pending in the Southern District of New York, sua sponte, without notice, without any due process procedures whatsoever, lawfully decree that petitioner, a native born American citizen and battle-starred veteran of World War II, be physically barred from the Federal Building in White Plains, unless he obtains Administrator Brieant's permission and/or the permission of Judge Politan of New Jersey?

15. Under the aforementioned no due process edict of Administrator Brieant, could petitioner be physically excluded from attending a judicial proceeding pending in such Federal Building in White Plains wherein his daughter is a party, involving her apartment, an apartment wherein petitioner resides, and the allegations in such litigated action in part center around allegations of petitioner's notoriety?

16. Under the aforementioned no due process edict of Administrator Brieant, could petitioner be physically excluded from filing a petition of bankruptcy, as is his unbridled constitutional and statutory right, except with the permission of Administrator Brieant and/or Judge Politan?

17. Under the aforementioned no due process edict of Administrator Brieant, could petitioner be physically excluded from inspecting his papers and his files housed in the Federal Building, except with the consent of Administrator Brieant and/or Judge Politan?

18. Could Administrator Brieant lawfully select the jurist who would review petitioner's complaint, which complaint included money damage claims against Administrator Brieant based upon his non-judicial misconduct?

19. Where petitioner's complaint complied with the condition set forth in Administrator Brieant's edict, although petitioner claimed the condition unlawful and/or inapplicable, could Judge Brieant's "selectee" refuse to authorize the filing of petitioner's complaint on the sole ground that it was "vexatious" without affording petitioner an opportunity to respond?

20. Assuming, arguendo, petitioner's complaint is "vexatious", could such ground be employed as the only ground for denying petitioner access to the court where the relief requested, equitable and legal, is irresistibly compelling?

21. Where almost every filed action is automatically "vexatious" to the defendants and/or respondents, is petitioner deprived of "due process" [equal protection] where he is deprived to access to the court for that reason?

22. Where Administrator Brieant is an active and viable defendant, including for money damage claims, did his charted procedures for petitioner's securing "judicial consent" satisfy the "appearance of justice"?

23. Could this Court's holding in Dennis v. Sparks (449 U.S. 24 [1980]) be lawfully circumvented by an

administrative "no due process" edict which denies access to the court to the victim against the administrator's lay co-conspirators, even when the relief sought is equitable as well as legal?

24. Could a judicial administrator lawfully immunize his own tortious conduct by a "no due process" edict which denies access to the court to the victim?

25a. Could a court, judge and/or administrator lawfully enjoin, deny and/or preclude, by "no due process" edicts, access to the court for Rule 60(b)[4][6] relief, where there are corrupt judicial involvements in the underlying judgments, orders and/or decrees?

b. Could a court, judge and/or administrator lawfully enjoin, deny and/or preclude access to the court in order to invalidate criminal convictions where there are corrupt judicial involvement in the convictions obtained?

26. Could a court, judge and/or administrator lawfully enjoin the mandatory requirement that a court-appointed receiver "account" for his stewardship, particularly when it is manifestly obvious, indeed admitted, that such assets were employed to corrupt state and federal jurists and officials?

27. Could a court, judge and/or administrator lawfully impose penal or quasi-penal sanctions while ignoring basic procedural guarantees, criminal or civil?

28. Could a court, judge and/or administrator lawfully impose penal or quasi-penal sanctions in retaliation for the exercise of First Amendment rights and mandatory professional obligations?

29. Except for res judicata and/or collateral estoppel may any court impose a more restrictive filing standard than that set forth in Neitzke v. Williams, 490 U.S. , 109 S.Ct. 1827 [1989])?

PRELIMINARY STATEMENT

1. This is the first of a series of interrelated certiorari petitions to the Second, Third, Fourth, Eighth, Ninth and District of Columbia Circuits.

Consolidation and/or joint considerations of these petitions is respectfully requested.

Anticipating that a consolidated and/or tandem consideration will be given to these various petitions, an attempt will be made by petitioner to avoid repetition wherever feasible.

2. There can be no more important petitions pending before this Court than petitioner's petitions, since they all involve the lawless bondage and corruption of the machinery of justice.

THE PARTIES

GEORGE SASSOWER
Appellant
16 Lake Street
White Plains, N.Y. 10603
(914) 949-2169

Chief Judge CHARLES L. BRIEANT
Defendant
101 East Post Road,
White Plains, N.Y. 10601
(914) 683-0567

TABLE OF CONTENTS

Questions Presented	i
Preliminary Statement	viii
The Parties	viii
Table of Contents	ix
Table of Authorities	ix
Opinions Below	1
Jurisdiction	1
Constitutional-Statutory Provisions	2
Statement of the Case	3
Reasons for Granting the Writ	8
Certificate of Service	11
Appendix	
Verified Complaint	A-01
Reference Chief Judge Briant to Judge Griesa	A-19
Opinion of Judge Griesa	A-20
Order-Circuit Court of Appeals	A-24

TABLE OF AUTHORITIES

Bushell's Case 124 Eng. Rep. 1006 [1670]	11
Balogh v. H.R.B. Caterers 88 A.D.2d 136, 452 N.Y.S.2d 221 [2d Dept.-1982]	9
Dennis v. Sparks 449 U.S. 24 [1980]	ii, vi, 4
Neitzke v. Williams 490 U.S. , 109 S.Ct. 1827 [1989]	viii

OPINIONS BELOW

As to whether petitioner's complaint violated a "1985 injunction", an injunction, incidentally, to which petitioner was not a party, his interests were not in issue, all pre-trial disclosure were stayed, no trials nor hearings ever took place, and petitioner was not permitted to appeal, Chief Judge Brieant referred the matter to U.S. District Judge THOMAS P. GRIESA (A-19).

The heart of Judge Griesa's opinion was that (A-23):

"Although Sassower has avoided violating the literal terms of Judge Conner's 1985 order by not suing any of the persons specifically protected by that order, the basic problem addressed by Judge Conner is presented in the new proposed complaint. It has no place in a court of law and is merely one more in a long line of vexatious proceedings by Sassower."

The Circuit Court denied petitioner's writ (A-24).

JURISDICTION

- (i) Decree of the Circuit Court: September 27, 1990
- (ii) None.
- (iii) Not Applicable
- (iv) 28 U.S.C. §1254(1)

CONSTITUTIONAL-STATUTORY PROVISIONS

1. Article I, §8 of the United States Constitution provides that:

"The Congress shall have the power [3] to regulate commerce ... among the several states ... [4] to establish ... uniform laws on the subject of bankruptcies throughout the United States. [9] to constitute tribunals inferior to the Supreme Court. [17] To exercise exclusive legislation in all cases whatsoever ... purchased ... other needful buildings. [18] To make all laws which shall be necessary and proper for carrying into execution the foregoing powers, and all other powers vested by this Constitution in the Government of the United States, or in any department or officer thereof."

2. Article IV, §2 of the United States Constitution provides that:

"The citizens of each state shall be entitled to all the privileges and immunities of citizens in the several states."

3. 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."

4. 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."

5. The Fifth Amendment of the United States Constitution provides that:

"No person shall ... be deprived of ... liberty, or property, without due process of law ...".

STATEMENT OF THE CASE

The core of petitioner's case in this petition is whether a judge can immunize his own "no due process" administrative misconduct from legal and equitable relief by requiring permission in order to commence any legal action.

THE FACTS:

Petitioner's case is summarized in his "Questions Presented". As amplified, the following are the facts, with references to petitioner's appendix:

1a. In or about November of 1987, petitioner "caught", once again, the admittedly disqualified U.S. District Judge WILLIAM C. CONNER ["Conner"] of the Southern District of New York, "fixing" a judicial proceeding (A-12).

b. This time the judicial proceeding was pending before U.S. District Judge CHARLES S. HAIGHT, JR. ["Haight"] of the Southern District of New York (A-12).

c. Indeed copies of such Judge Conner "fixing" memorandum to Judge Haight, "Bill to Terry", was circulated to others as well, including Judge Brieant, Judge GERARD L. GOETTEL, and Bankruptcy Judge HOWARD SCHWARTZBERG ["Schwartzberg"] (A-12).

d. The Judge Conner "fixing memorandum" was distributed on behalf of K&R and FKM&F after an ex parte meeting

with FKM&F, on behalf of themselves and their co-conspirators, with respect to the matter pending before Judge Haight (A-12).

e. As a consequence thereof, as a matter of course, petitioner amended his complaint to add "Conner, The Fixor", as a Dennis v. Sparks (supra) co-defendant (A-12).

f. Since plaintiff was very familiar with the Dennis v. Sparks (supra) holding, he did not include Judge Haight, "The Fixee", as a party defendant (A-13).

2a. Administrator Brieant who was also exerting improper influence on behalf of K&R and FKM&F, seized upon the occasion of the amendment of petitioner's complaint, to dismiss the action before Judge Haight case (A-13).

b. At all times, both before and after the Administrator Brieant dismissal, petitioner's action was before Judge Haight and no one else (A-13).

c. The Administrator Brieant published "diatribe", in justification thereof, was based upon the false, contrived, fabricated and concocted premise that (A-13):

"Judge Haight himself has been added to the case as a defendant [by petitioner] ..".

d. Thus, based upon such false, contrived, fabricated and contrived premise, which also shielded Judge Conner, by a "no due process" procedure, which Administrator Brieant himself knew was a nullity, Administrator Brieant could further state that the (A-13):

"inclusion of the assigned judge [Judge Haight] as an additional defendant had the effect, and probably the purpose of disrupting the orderly judicial decisional process of the district court."

3. Instructively, although petitioner's complaint correctly sets forth the facts, Judge THOMAS P. GRIESA ["Griesa"] in his opinion repeats this canard concerning the inclusion of Judge Haight as a party defendant (A-21).

4a. Still without any due process procedures, Administrator Brieant also decreed (A-14):

"The Clerk of this Court is hereby ORDERED not to accept for filing any paper or proceeding or motion or new case of any kind presented by Mr. George Sassower, or naming him as a party plaintiff or petitioner, without the leave in writing first obtained from a judge or magistrate of this Court who shall have examined such paper to assure that it is not in violation of the 1985 ["Conner"] injunction."

b. Petitioner was not a party to the 1984 action before Judge Conner (Raffe v. Doe, 619 F. Supp. 891 [SDNY-1985]), verified by its title, and petitioner's interests were not placed in issue in the filed complaint.

c. There were no trials or hearings in such Judge Conner action, and immediately after the filing of the complaint, all pre-trial disclosure on behalf of plaintiff therein were stayed.

d. About sixteen months later, Judge Conner issued his injunctive order against petitioner, a non-party, and HYMAN RAFFE ["Raffe"], in addition to imposing Rule 11 costs on both of them.

e. Petitioner filed notices of appeal and K&R and FKM&F threatened Raffe that unless he paid them millions of dollars, discontinued his appeal, executed releases in favor of, inter alia, the federal judges in the Eastern and Southern

Districts of New York, he would be incarcerated under trialless convictions.

f. Raffe succumbed, stipulated to discontinue his appeals, and notwithstanding the Rule 11 costs and injunction imposed on petitioner, the Circuit Court refused to allow petitioner to prosecute the appeal on his own behalf.

5a. Clearly a 1985 injunction could not immunize post-1985 conduct by K&R and FKM&F, as set forth in the complaint before Judge Haight.

b. In any event, petitioner's 1990 complaint (A1-A18) did not include K&R or FKM&F as defendants and therefore did not violate the Judge Conner injunction (A-11), as Judge Griesa conceded (A-23).

6a. The day after the Administrator Brieant ukase, again without any pretense of due process or authority, Administrator Brieant invaded the bailiwick of Bankruptcy Judge HOWARD SCHWARTZBERG ["Schwartzberg"], an Article I jurist, and directed that in the bankruptcy proceeding before His Honor that (A-14):

"No further papers are to be filed under this docket number by Mr. Sassower ... without leave in writing first obtained from a Judge or Magistrate."

b. This Administrator Brieant direction, and other "fixing" operations by Administrator Brieant, Judge Conner and others, were clearly intended as "marching orders" to Judge Schwartzberg, bankruptcy trustee JEFFREY L. SAPIR, Esq. ["Sapir"], and U.S. Trustee HAROLD JONES ["Jones"], that they should execute false federal documents and papers, which they

did, asserting, inter alia, that petitioner's estate contained "no assets", and terminate petitioner's case, also without any pretense at due process (A-15).

c. This Administrator Brieant edict, and other "fixing" operations by Administrator Brieant, Judge Conner, and their co-conspirators, were also intended, and perceived by Judge Schwartzberg, as a direction not to entertain those motions which petitioner might make as a matter of right under, inter alia, Rule 59 and 60 of the Federal Rules of Civil Procedure, and/or as mirrored in the Bankruptcy Rules [Bankruptcy Rule 9024].

7a. In or about August of 1989, under a conspiratorial arrangement made by and between Administrator Brieant and Judge Politan of New Jersey, without even a pretense of due process or lawful authority, by oral edict, not made in petitioner's presence or knowing, Administrator Brieant ordered that petitioner be physically excluded, as he thereafter learned, from the entire Federal Building in White Plains, and each and every part thereof, "unless his [petitioner's] physical presence is actually required", as Administrator Brieant, six (6) months later, wrote (A-3).

b. Permission for petitioner's physically admittance to the Federal Building in White Plains when "actually required" must be obtained from either Administrator Brieant or Judge Politan.

8a. As petitioner's complaint sets forth, there has been and is pending in such Federal Building, before Judge Goettel, proceedings related to the non-acceptance of

petitioner's daughter as a tenant wherein petitioner resides (A-4).

b. Essential allegations for the non-acceptance of petitioner's daughter as a tenant is bottomed on petitioner's notoriety resulting from his exposure of judicial and prosecutorial misconduct (A-7).

c. Obviously the inability of petitioner's physical attendance is extraordinarily prejudicial, in addition to being patently unlawful.

9. By reason of such administrative ukases, petitioner is prevented from filing a petition in bankruptcy and is being denied access to his files and papers being housed in the Federal Building in White Plains.

10a. The admitted disqualification of Administrator Brieant to adjudicate the application, extends to a disqualification to designate the jurist to review the petition.

b. Clearly, Administrator Brieant was not going to designate a jurist who was going to permit the filing of an action which seeks money damages against the Chief Judge.

11. To the extent that there are other facts necessary to support the questions presented herein, they are set forth in related petitions.

REASONS FOR THE GRANT OF THIS WRIT

1. There can be no more important pending petition in this Court than the series of petitions being brought by the petitioner, all of which involve the integrity of machinery of justice.

a. Through the purported exercise of administrative power, no judge can constitutionally intrude upon the judicial independence of any Article III or the quasi-independence Article I jurist, as has Chief Judge CHARLES L. BRIEANT at bar.

(1) Without any pretense of due process, Judge Brieant dismissed an action pending before Judge Haight and simultaneously attempted to immunize his own misconduct by an edict which denied access to the court to the petitioner to remedy the situation.

(2) Without any pretense of due process, Judge Brieant directed the U.S. Trustee, the Bankruptcy Trustee and the Bankruptcy Judge to execute false and deceptive papers in order to close out a case, and simultaneously attempted to immunize such misconduct by an edict which made judicial permission to nullify his administrative action.

(3) Subsequent petitions will disclose substantially other intrusive acts of misconduct by Judge Brieant and other jurists.

(4) The core of the opinion of Mr. Justice [now Judge] Titone in Balogh v. H.R.B. Caterers (88 A.D.2d 136, 452 N.Y.S.2d 221 [2d Dept.-1982]), which this Court should clearly endorse, is (at p. 141-2, 225):

"We deem it essential at this time to voice our strong disapproval of the Trial Judge in surrendering his responsibility to determine ... relying instead upon instructions from the Administrative Judge. ... A judge may not delegate or surrender his judicial authority to someone else by administrative order or otherwise ... but must exercise such authority himself."

b. The judicial robe is not an emolument of exalted office for the purpose of "fixing" other jurists, as is the practice of Judge Conner.

(1) Subsequent petitions by petitioner will reveal numerous examples of "fixing" by jurists and the sophisticated manner by which it is now being practiced in Second and other Circuits.

(2) There can be nothing as lethal to due process as a "fixed" court or jurist.

2a. The physical exclusion of petitioner from the Federal Building in White Plains by Judge Brieant and Judge Politan, again without any pretense of due process, is nothing less than usurped power run totally amok, and denies to petitioner of a "liberty" interest without due process.

b. Petitioner's physical exclusion from the Federal Building in White Plains was witnessed by a prominent reporter, is a situation also known by several congressman, the public and places the judiciary in disrepute.

c. Such disrepute is augmented by petitioner's inability to gain access to the court to have such physical exclusion order nullified.

3. Petitioner's physical exclusion from the Federal Building in White Plains triggers collateral legal problems:

a. All criminal proceedings in such Federal Building are potentially infirm.

b. The civil proceedings before Judge Goettel, with

petitioner's daughter a party, revolving in great part on petitioner's notoriety, is also probably infirm.

c. The inability of petitioner to gain access to various documents housed therein impairs petitioner to fully present his cases, rendering all petitioner's proceedings subject to a plea of extrinsic fraud.

4. Judicial despotism by refusal to give obedience to "due process" requirements is not unknown to the law (Bushell's Case, 124 Eng. Rep. 1006 [1670]).

5. Other reasons for the grant of this and subsequent petitions are more appropriately set forth in subsequent petitions.

Dated: October 12, 1990

Respectfully submitted,

GEORGE SASSOWER
Petitioner, Pro Se.

CERTIFICATION OF SERVICE

On October , 1989, I served a true copy of this Petitioner by mailing same in a sealed envelope, first class, certified mail (P), with proper postage thereon, addressed to the Solicitor General, Department of Justice, Washington, D.C. 20530.

ELENA R. SASSOWER

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK .

-----x
GEORGE SASSOWER,

Plaintiff,

Docket #

-against-

CHARLES L. BRIEANT; NICHOLAS H. POLITAN;
16 LAKE STREET OWNERS, INC.; LAWRENCE J.
GLYNN; DENIS DILLON; WILLIAM C. CONNER;
EUGENE H. NICKERSON; ALVIN F. KLEIN;
DAVID B. SAXE; FRANCIS T. MURPHY; XAVIER
C. RICCOBONO; IRA GAMMERMAN; DONALD
DIAMOND; HOWARD SCHWARTZBERG; JEFFREY
L. SAPIR, and HAROLD JONES,
Defendants.

JURY TRIAL DEMANDED

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

AS AND FOR A FIRST CAUSE OF ACTION

1. 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.

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, and his rights under federal law.

3a. Personal jurisdiction over the claims for relief is under 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. The jurisdiction of this Court is 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.

4. The Federal Building at 101 East Post Road, White Plains, New York 10601 is controlled, operated and managed by, on information and belief, the General Services Administration, an agency of the executive branch of the United States of America.

5. Plaintiff, as a citizen, has the free right to access to said building, in a manner not essentially different than any other citizen.

6a. The defendant, Chief Judge CHARLES L. BRIEANT ["Brieant"] of the United States District Court for the Southern District of New York, has his Courtroom and Chambers in only a portion of said building.

b. As against plaintiff, Brieant has complete and unbridled control of his Chambers, and plaintiff never contended otherwise.

c. As against plaintiff, in public judicial proceedings, Brieant has only "police power" control of his Courtroom.

7. U.S. District Judge NICHOLAS H. POLITAN ["Politan"] of the District of New Jersey, has neither Courtroom, Chambers, nor any other facility at the Federal Building in White Plains, and no right to control any part of same.

8. In or about August of 1989, under a conspiratorial arrangement made by and between Brieant and Politan, without even a pretense of due process or lawful authority, by oral edict, not made in plaintiff's presence or knowing, Brieant physically excluded plaintiff, as he thereafter learned, from the entire Federal Building in White Plains, and each and every part thereof, including the common areas and areas not under Brieant's exclusive or police power control, "unless and until his [plaintiff's] physical presence is actually required", as Brieant, six (6) months later, wrote.

9a. This was in addition to the Brieant edict, also made without a pretense of due process, that no legal papers were of plaintiff or anyone on his behalf were to be accepted by the Clerk's of the District Court or Bankruptcy Court in the Southern District of New York, unless they were approved, and met certain unlawful criteria.

b. The criteria imposed for the filing of papers, under this without due process procedure, was intended to advance a criminal racketeering adventure involving the larceny and unlawful plundering of judicial trust assets, extortion and other criminal activities, a criminal adventure in which Brieant is an essential participant.

10. By reason of the aforementioned, plaintiff's civil rights have been infringed upon, by "governmental action", "under color of law", including his right to a "due process" determination, resulting in substantial damage to plaintiff in a proceeding now pending before U.S. District Judge GERARD L. GOETTEL ["Goettel"] of the Southern District of New York under Docket No. 88 Civ. 5775 [GLG], which is taking place in the aforementioned Federal Building.

AS AND FOR A SECOND CAUSE OF ACTION

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

12a. For more than two (2) years, plaintiff has been residing at 16 Lake Street, White Plains, New York 10603, Apartment 2C, which is the subject matter of the judicial proceedings pending before Judge Goettel.

b. By reason of such continuous occupancy, plaintiff has a legally vested interest in such proceedings, which seeks by indirection, plaintiff's eviction therefrom.

13. The aforementioned judicial proceedings before Judge Goettel, as a matter of established law of constitutional magnitude, are public and plaintiff, as a legitimate member thereof, has the unbridled right to view same provided he conducts himself with proper decorum, and he has never been accused to have acted otherwise.

14a. However, since plaintiff's physical presence is not "actually required", he has been excluded therefrom, under the Brieant-Politan "no due process" edict, an edict in which Judge Goettel has not expressed any dissent or disagreement with, as far as plaintiff is aware.

b. In addition, plaintiff papers are not accepted for filing or judicial consideration, even when they do not violate the Brieant criteria, including in the proceedings before Judge Goettel.

15. Such Brieant edicts are null, void and of no legal effect, as are the proceedings before Judge Goettel, by reason thereof.

AS AND FOR A THIRD CAUSE OF ACTION

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

17. On Friday, July 13, 1990, as an occupant of the aforementioned premises, plaintiff was tendered certain legal papers on behalf of a participant in the aforementioned legal proceedings before Judge Goettel.

18. Plaintiff glanced at the Local Rule 3[g] statement and Memorandum of Law which had been executed, according to such documents, by defendant, LAWRENCE J. GLYNN, Esq. ["Glynn"] on behalf of the defendant, 16 LAKE STREET OWNERS, INC. ["owners"], and plaintiff saw his name mentioned therein rather liberally, as being a substantial, if not the prime, reason for the attempt to evict the prime occupant and plaintiff.

19. In attempting to evict the prime occupant and plaintiff, "Glynn" and "owners" are acting jointly with Brieant, Judge Goettel, and other federal and state officials, who are acting under "color of law", for which they, as well as others, are liable to plaintiff in damages, and which are here demanded.

AS AND FOR A FOURTH CAUSE OF ACTION

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

21. In the "Memorandum" of "Glynn" and "owners", the following is stated (p. 24-26):

"Among the reasons set forth [for rejection] are

a) the highly visible and audible arrest of GEORGE SASSOWER in the building and the resultant terror of the other residents ...

b) the use of the apartment by GEORGE SASSOWER for apparently illegal practice of law after he had been disbarred ...

e) in deference to her perception of the alleged injustices that had been imposed by her father ...

l) the notoriety attached to GEORGE SASSOWER ...

m) the long and lengthy history of vexatious litigation involving ... GEORGE SASSOWER"

22. In "owners" 3[g] statement the following appears, as the reasons for "owners" disapproval:

"During or about February 1988, George Sassower was arrested at 16 Lake Street Owners, Inc. and removed from the building in handcuffs."

"On June 5, 1988, sixteen months after his disbarment, George Sassower wrote a two page letter addressed to Honorable Ronald Reagan, President of the United States on the letterhead of 'George Sassower, Attorney at Law, 16 Lake Street, White Plains, New York 10603' ..."

"Although he has been disbarred by the Supreme Court of the State of New York, Appellate Division on February 23, 1987 ... on the basis that he had been convicted of criminal contempt of Court on June 7, 1985 (U.S. District Court, Eastern District of New York, Hon. Eugene H. Nickerson, Presiding) on June 26, 1985 in Supreme Court, New York County (Saxe, J.) and had engaged in frivolous and vexatious litigation against litigants, judges, referees, attorneys, public officials and other parties who participated in certain litigation that George Sassower was involved in on behalf of a client and that said litigation was for the

purpose of harassing, threatening, coercing and maliciously injuring those made subject to it, George Sassower thereafter on June 5, 1988 and June 15, 1988, in writing, held himself out to be an Attorney at Law with offices at 16 Lake Street, White Plains, New York, and purporting to complain on behalf of his clients."

23. Thus, "Glynn" and "owners" are acting jointly with Briant and Judge Goettel under "color of law" in the aforementioned judicial proceedings, but as their own legal documents reveal, jointly with other federal and state officials, acting under "color of law".

24a. In a prior proceeding before Judge Goettel, plaintiff was representing, inter alia, DENNIS F. VILELLA ["Vilella"] and in July and August 1987 such representation was at the direction of Judge Goettel.

b. In making such direction, Judge Goettel was acting well within the legal limits of his authority, and under pains of possible contempt proceedings, plaintiff had to give obedience to same.

c. Furthermore, in July and August of 1987, and for a long time thereafter, plaintiff was admitted and entitled to practice law in the federal courts in the Eastern District of New York, an Article III court, created by Congress, which had the incidental lawful authority to have an independent bar membership.

d. In addition thereto, by state statute, as well as federal decisional law, plaintiff, as well as others, are entitled to practice law, as a pro se litigant.

25a. In February of 1988, on the pretext that plaintiff's actions in July and August 1987, related to Vilella, were unlawful, without prior notice or warning was arrested at the Lake Street premises by members of the office of District Attorney DENIS DILLON ["Dillon"] of Nassau County, as alleged in the papers of "Glynn" and "owners", but not exactly in the manner described therein.

b. Such arrest was under "color of law" and constituted "state action", which now "Glynn" and "owners" desire to become jointly involved, for the purpose of the litigation before Judge Goettel.

26a. Plaintiff's arrest was made under an Information which, in addition to other legal infirmities, was based upon "hearsay" allegations, rendering the arrest warrant to be jurisdictionally infirm and void (People v. Alejandro, 70 N.Y.2d 133, 517 N.Y.S.2d 927 [1987]).

b. Since said arrest warrant was void, at this juncture, there is little point in alleging, in detail, the needless excessive force employed by the Dillon entourage, the intentional display of notoriety in making such arrest, the fact that Dillon, a local officer, had no police powers in Westchester County, and many other legal improprieties.

c. However, as they thereafter admitted, the person who executed the "hearsay" Information, had been misled by others, and they were not aware that plaintiff was, in the end of July and beginning of August, 1987, entitled to practice in the Eastern District of New York, before Judge Goettel, and as a pro se litigant.

27a. At all times alleged by "Glynn" and "owners", plaintiff was a member of the bar in "good standing" at, inter alia, the Eastern District of New York, and thus entitled to employ an identification as an "Attorney at Law".

b. Here again, since "Glynn" and "owners" desire to act jointly with and under a federal governmental practice and usage of having a separate bar, and "Glynn" and "owners" are acting jointly under "color of law" with "governmental action", rendering them liable in damages.

28a. As a matter of ministerial obligation, permitting no discretion whatsoever, before guilt can be found for any constitutionally protected crime, including non-summary criminal contempt, every American jurist, must afford every person the opportunity of a trial (Nye v. U.S., 313 U.S. 33 [1941]; Bloom v. Illinois, 391 U.S. 194 [1968]).

b. As a matter of ministerial obligation, permitting no discretion whatsoever, before any person can be found guilty of any constitutionally protected crime, even when there is an intentional and deliberate default, there must be 'live' testimony in support thereof, otherwise the conviction is null,

void and of no legal effect whatsoever (10 Wright, Miller & Kane, Fed Prac & Proced. §2693, p. 481).

c. U.S. District Judge EUGENE H. NICKERSON ["Nickerson"] of the Eastern District of New York; N.Y. Supreme Court Justice ALVIN F. KLEIN ["Klein"]; and Acting N.Y. Supreme Court Justice, DAVID B. SAXE ["Saxe"], acting under "color of law", federal or state, knowingly transgressed their jurisdictional power and constitutional authority, for private purposes, and without an opportunity for a trial, and without any 'live' testimony in support thereof, found plaintiff, and others, guilty of non-summary criminal contempt.

d. Since "Glynn" and "owners" have become joint actors with state and federal officials in the aforementioned criminal contempt proceedings, and acting jointly with the state and federal officials who disbarred plaintiff pursuant to such manifestly unconstitutional and void convictions, they are acting under "color of law" and liable in damages to the plaintiff.

29. Since there is no immunity, where there is no official or judicial discretion, damages are also requested of Nickerson, Klein and Saxe, who could have generally anticipated such consequences for their lawless conduct.

30. Since Briant, is one of the "smut peddlers" who, under "color of law", propagates the false assertion of vexatious litigation, in order to conceal his criminal racketeering adventures, damages are also requested of Briant and "Glynn" and "owner", who are joint participants with Briant, in their attempt to evict plaintiff.

AS AND FOR A FIFTH CAUSE OF ACTION

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 same were more fully set forth herein, and further alleges:

32a. In or about November of 1987, plaintiff "caught", once again, U.S. District Judge WILLIAM C. CONNER ["Conner"] of the Southern District of New York "fixing" a judicial proceeding.

b. This time the judicial proceeding was pending before U.S. District Judge CHARLES S. HAIGHT, JR. ["Haight"] of the Southern District of New York.

c. Indeed copies of such Conner "fixing" memorandum to Judge Haight, "Bill to Terry", were circulated to others as well, including Briant, Judge Goettel, Bankruptcy Judge HOWARD SCHWARTZBERG ["Schwartzberg"].

d. Such Conner "fixing memorandum" was distributed on behalf of FELTMAN, KARESH, MAJOR & FARBMAN, Esqs. ["FKM&F"] and KREINDLER & RELKIN, P.C. ["K&R"] -- "the criminals with law degrees" -- after an ex parte meeting with FKM&F, on behalf of themselves and their co-conspirators, with respect to the matter pending before Judge Haight.

e. As a consequence thereof, as a matter of course, plaintiff amended his complaint to add Conner, "The Fixor", as a Dennis v. Sparks (449 U.S. 24 [1980]) defendant.

f. Since plaintiff was very familiar with the Dennis v. Sparks (supra) holding, he did not include Judge Haight, "The Fixee", as a party defendant.

33a. By an ex parte procedure, in which plaintiff was not involved nor given notice, Brieant apparently was requested to reassign such matter from Judge Haight to another jurist, and for no other purpose.

b. This should have been performed ministerially by the "wheel" selection method, but instead, without notice, without opportunity to controvert, without any "due process", before or after, without anything, Brieant seized upon the occasion to dismiss, without prejudice, the Judge Haight case, which at all times, both before and after, was before Judge Haight and no one else.

c. The Brieant published "diatribe", in justification thereof, was based upon the false and contrived premise that:

"Judge Haight himself has been added to the case as a defendant [by plaintiff] ..".

d. Thus, based upon such false and contrived premise, by a "no due process" ukase, which Brieant himself knew was false and lawless, Brieant could further state that the:

"inclusion of the assigned judge [Judge Haight] as an additional defendant had the effect, and probably the purpose of disrupting the orderly judicial decisional process of the district court."

34. Still without any due process procedures, Brieant stated:

"The Clerk of this Court is hereby ORDERED not to accept for filing any paper or proceeding or motion or new case of any kind presented by Mr. George Sassower, or naming him as a party plaintiff or petitioner, without the leave in writing first obtained from a judge or magistrate of this Court who shall have examined such paper to assure that it is not in violation of the 1985 ["Conner"] injunction."

35. By reason of the absence of due process, of conduct wholly beyond Brieant's orbit of judicial competence or authority, and for transcending ministerially prohibitions, including the judicial independence of an Article III jurist, all under "color of law", the plaintiff has been substantially damaged by Brieant and Conner as aforementioned, for which damages are demanded.

AS AND FOR A SIXTH CAUSE OF ACTION

36. Plaintiff repeats, reiterates and realleges each and every allegation of the complaint marked "1" through "35" inclusive, with the same force and effect as though same were more fully set forth herein, and further alleges:

37. The day after the Brieant ukase, again without any pretense of due process or authority, Brieant invaded the jurisdictional bailiwick of Bankruptcy Judge Schwartzberg, an Article I jurist, and directed that in the proceeding before Judge Schwartzberg that:

"No further papers are to be filed under this docket number by Mr. Sassower ... without leave in writing first obtained from a Judge or Magistrate."

38a. This Brieant direction, and other "fixing" operations by Brieant, Conner and others, was clearly intended as "marching orders" to Judge Schwartzberg, JEFFREY L. SAPIR, Esq. ["Sapir"], and U.S. Trustee HAROLD JONES ["Jones"], that they should falsify and execute federal documents and papers, which they did, asserting, inter alia, that plaintiff's estate contained "no assets", and terminate plaintiff's case in bankruptcy.

b. This Brieant direction, and other "fixing" operations by Brieant, Conner, and their co-conspirators, was also intended, and perceived by Judge Schwartzberg, as a direction not to entertain those motions which plaintiff might make as a matter of right under, inter alia, Rule 59 and 60 of the Federal Rules of Civil Procedure, and/or as mirrored in the Bankruptcy Rules.

39a. By reason of the aforementioned, plaintiff demands substantial damages from the aforementioned, including from Judge Schwartzberg, for his refusal to entertain motions ministerially compelled, the ukase of Brieant notwithstanding.

b. In addition thereto, demand is made that there be declared null, void and of null effect, the documents executed by Judge Schwartzberg, Sapir and Jones, that Judge Schwartzberg be directed to accept any and all motions made by plaintiff pursuant to Rule 60[b] of the Federal Rules of Civil Procedure, and/or any other paper, document or motion from plaintiff in a

non-discriminatory manner, and such other equitable relief as may be just and proper in the manner.

AS AND FOR A SEVENTH CAUSE OF ACTION

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

41. Plaintiff's right to access to the courts for relief, without being aborted at the threshold, or judicially ejected by no due process procedures, comes under the protective umbrella of the United States Constitution as a matter of right, not of judicial or official grace.

42. Only where there is a patent lack of subject matter or personal jurisdiction, or res judicata, may access to the courts be denied at the threshold.

43. Presiding Justice FRANCIS T. MURPHY ["Murphy"], Administrator XAVIER C. RICCOBONO ["Riccobono"], Mr. Justice IRA GAMMERMAN ["Gammerman"], Referee DONALD DIAMOND ["Diamond"], and others members of the state judiciary and officials are engaged in "racketeering enterprises", with Brieant, Conner and others on the federal bench, involving the larceny and unlawful plundering of estates and trusts, extortion, and other criminal activities.

44. An essential aspect of this "criminal racketeering activity" involves unconstitutionally denying those who oppose such criminal activity, access to the courts for relief.

45a. Thus, by this unconstitutional process, Referee Diamond, albeit the absence of power or authority, "approved" a "final accounting" for LEE FELTMAN, Esq. ["Feltman"], the court-appointed receiver for PUCCINI CLOTHES, LTD. ["Puccini"] -- "the judicial fortune cookie".

b. However, as each and every defendant actually knows, there is no "accounting", final or otherwise, that Referee Diamond "approved". -- It is "phantom".

c. "The criminals with law degrees", and their co-conspirators, who include the defendants herein, made such judicial trust assets the subject of massive larceny and unlawful plundering, leaving absolutely nothing for the legitimate stockholders and creditors.

d. Obviously, and it is publicly boasted, "the criminals with law degrees" and CITIBANK, N.A. ["Citibank"], made members of the judiciary and/or their designees, partners and/or participants.

46a. With the Puccini judicial trust assets dissipated, "the criminals with law degrees", aided by the defendants and others, engaged in extortion where in exchange millions of dollars and releases to the federal "judges of Eastern and Southern District of New York" and "New York State Supreme Court, County of New York", one could avoid incarceration under trialess, without 'live' testimony convictions.

b. Even when fine monies, under trialess convictions, were ordered to be paid "to the [federall] court", under the aforementioned Nickerson Order, as alleged by "Glynn" and "owners", those substantial monies were diverted to the private pockets of K&R and its clients.

47. "Glynn" and "owners", by their allegations are acting "jointly" with state and federal governmental officials, as aforementioned, acting under "color of law", and are also liable to plaintiff in damages.

WHEREFORE, it is respectfully prayed that the equitable relief requested herein be granted, with substantial, racketeering and other, monetary damages, in the sum of \$1000,000,000, together with interests, costs, and disbursements.

Dated: July 19, 1990

GEORGE SASSOWER

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

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

Dated: July 19, 1990

GEORGE SASSOWER

A-18

BRIANT CHIEF

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

DOC # 2

GEORGE SASSOWER,
Plaintiff,

Docket #

-against-

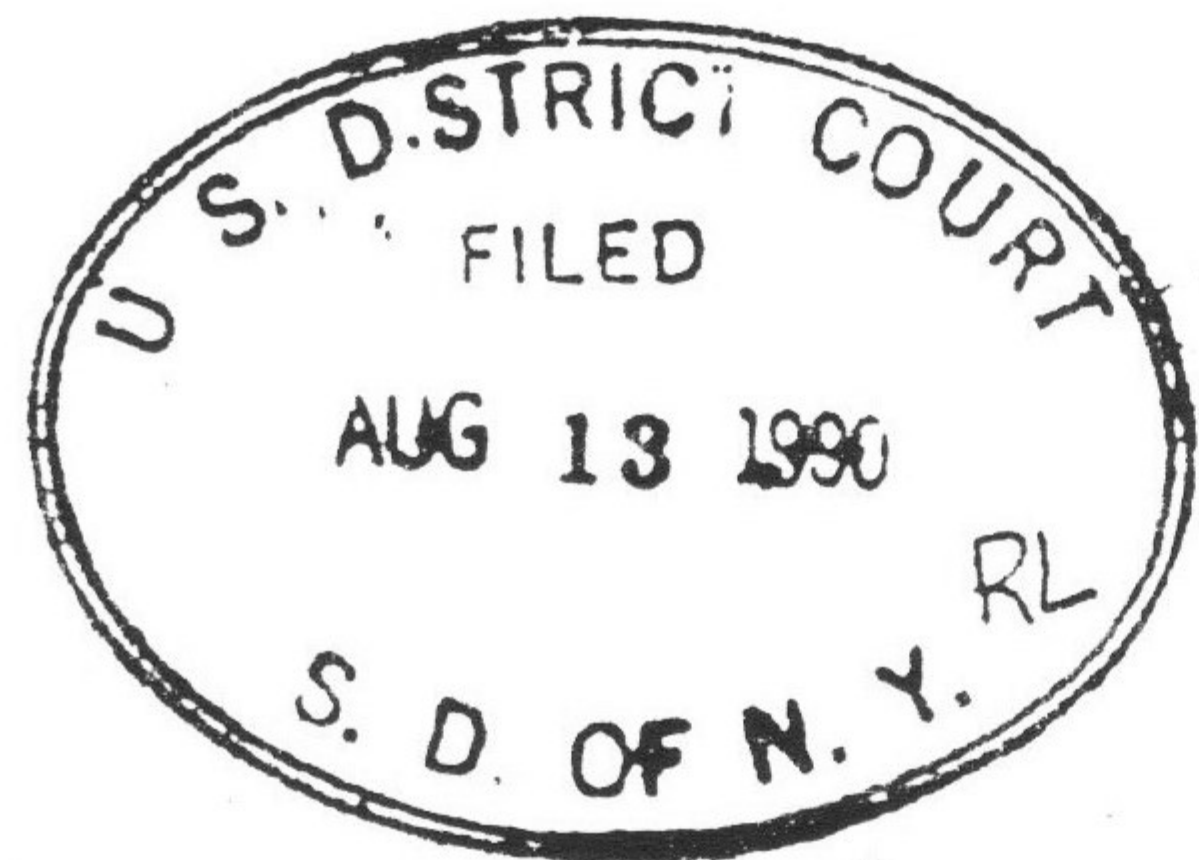
CHARLES L. BRIANT; NICHOLAS H. POLITAN;
16 LAKE STREET OWNERS, INC.; LAWRENCE J.
GLYNN; DENIS DILLON; WILLIAM C. CONNER;
EUGENE H. NICKERSON; ALVIN F. KLEIN;
DAVID B. SAXE; FRANCIS T. MURPHY; XAVIER
C. RICCOBONO; IRA GAMMERMAN; DONALD
DIAMOND; HOWARD SCHWARTZBERG; JEFFREY
L. SAPIR, and HAROLD JONES,
Defendants.

UPON the annexed affirmation of GEORGE SASSOWER,
dated July 31, 1990, the Verified Complaint, and the Order of
December 10, 1987, and it appearing to the satisfaction of the
Court that said complaint does not violate the 1985 injunction.

Now, on motion of GEORGE SASSOWER, it is
ORDERED that the Clerk of this Court is to accept
same for processing and filing.

So Ordered

Dated: , 1990



Chief U.S.D.J.
81-96

Respectfully referred to the Hon Thomas P. Guiso
as Acting Chief Judge, since I am one of
the persons sought to be sued
SO ORDERED

August 7, 1990

Charles Briant
Chief Judge.
A-19

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In the Matter of : M-49 (TPG)
GEORGE SASSOWER :
-----X

On August 1, 1990 the office of Chief Judge Brieant received from George Sassower a proposed order bearing the caption

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
-----X

George Sassower,

Plaintiff,

- against -

Charles L. Brieant; Nicholas H. Politan; 16 Lake Street Owners, Inc.; Lawrence J. Glynn; Denis Dillon; William C. Conner; Eugene H. Nickerson; Alvin F. Klein; David B. Saxe; Francis T. Murphy; Xavier C. Riccobono; Ira Gammerman; Donald Diamond; Howard Schwartzberg; Jeffrey L. Sapir, and Harold Jones,

Defendants.

-----X

The proposed order was accompanied by a complaint which Sassower wished to file by way of commencing an action in this court. Sassower was requesting the Chief Judge to direct the clerk of the court to accept the complaint in this action for filing and processing. On August 7, 1990 Chief Judge Brieant signed an

order referring the matter to me as Acting Chief Judge, since Brieant is one of the defendants in the proposed action.

The reason for the submission of this proposed order is as follows. On October 11, 1985 Judge William C. Conner of this court handed down an opinion and an order in an earlier action. Raffe v. Doe, 619 F. Supp. 891 (S.D.N.Y. 1985). The opinion described Sassower's abuse of the processes of various courts in actions and motions in connection with the judicial dissolution of a company named Puccini Clothes, Ltd. Judge Conner entered an order against Sassower prohibiting him from instituting any action or proceeding in any federal court against certain parties or anyone connected with these parties if the subject matter of the action and proceeding arose out of affairs of Puccini Clothes, Ltd.

In 1987 Sassower brought a new action naming as defendants several of the parties protected by Judge Conner's injunction. This time Sassower also joined Judge Conner as a defendant. The case was assigned to Judge Charles S. Haight, Jr. Thereupon Sassower added Judge Haight as a defendant.

On December 10, 1987 Judge Brieant, in his capacity as Chief Judge and Chairman of the Assignment Committee of the court, issued an order dismissing the action, finding that it violated Judge Conner's 1985 order. The order further directed

that the clerk of the court should not accept for filing any paper or proceeding or motion or any case presented by Sassower, or naming him as a party plaintiff or petitioner, without obtaining written authorization from a judge or magistrate of this court, who was to examine the submission to assure that it was not in violation of the 1985 order.

The proposed complaint now presented for filing names four federal district judges - Charles L. Brieant and William C. Conner of the Southern District of New York; Eugene H. Nickerson of the Eastern District of New York; and Nicholas H. Politan of the District of New Jersey. Another defendant is Bankruptcy Judge Howard Schwartzberg of the Southern District. Certain New York State judges are sued, including Francis T. Murphy, Presiding Justice, Appellate Division, First Department.

The proposed complaint attacks Judge Conner's 1985 order and Chief Judge Brieant's 1987 order. Moreover, it is asserted that federal judges are engaged in a racketeering enterprise with state judges and officials to deny Sassower access to the courts. The complaint alleges that one result of all this activity was the approval of the accounting of a court-appointed receiver for Puccini Clothes, Ltd., despite the fact that such accounting was improper and the assets of Puccini Clothes, Ltd. had been improperly dissipated.

In addition to these allegations, there are outpourings of abuse charging corrupt collusion of Southern District Judge Gerard L. Goettel (not named as a defendant) and Judge Briant in regard to a real estate interest of Sassower in White Plains.

Although Sassower has avoided violating the literal terms of Judge Conner's 1985 order by not suing any of the persons specifically protected by that order, the basic problem addressed by Judge Conner is presented in the new proposed complaint. It has no place in a court of law and is merely one more in a long line of vexatious proceedings by Sassower.

The proposed order permitting the filing of this new action will not be signed.

SO ORDERED.

Dated: New York, New York
August 13, 1990



THOMAS P. GRIESA
Acting Chief Judge

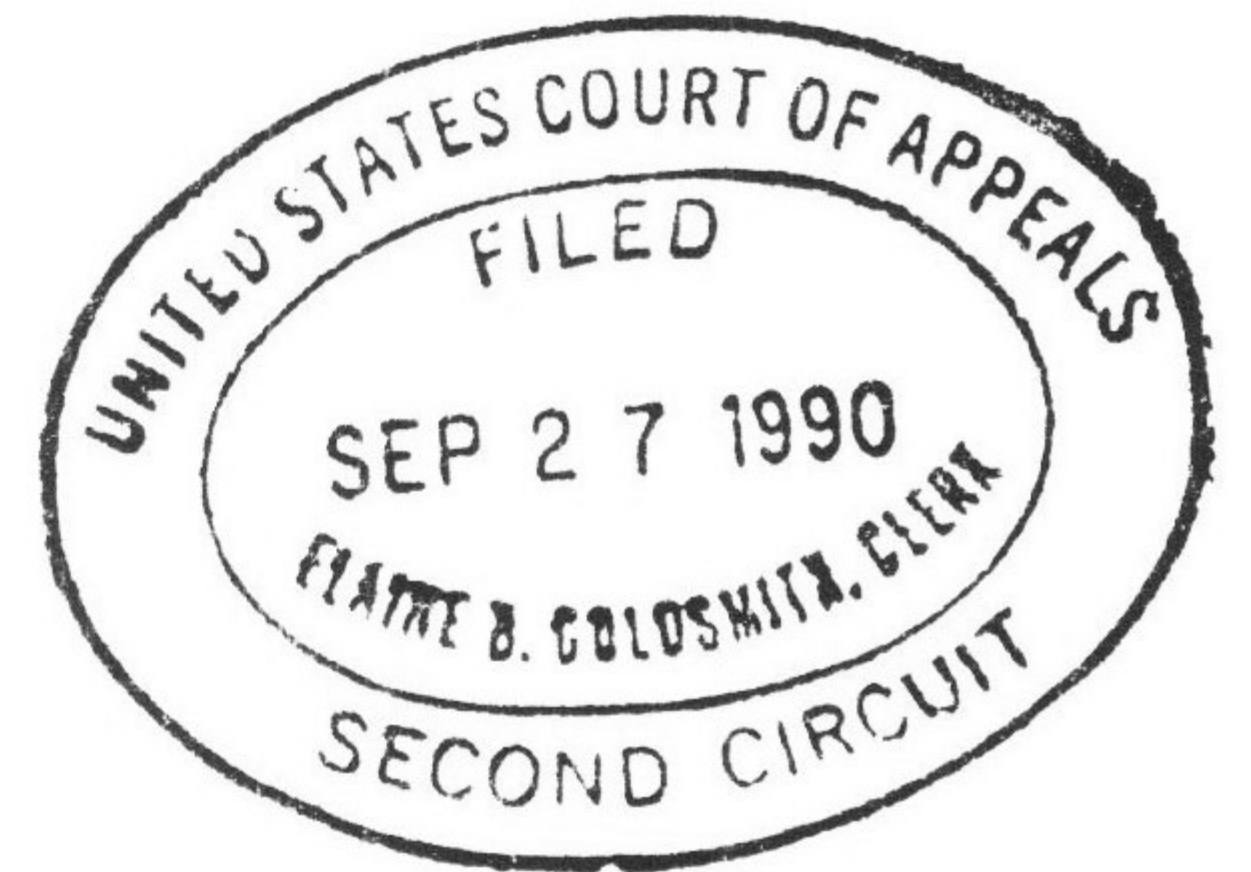
United States Court of Appeals

FOR THE

SECOND CIRCUIT

SDNY

At a stated Term of the United States Court of Appeals for the Second Circuit, held at the United States Courthouse in the City of New York, on the 27th day of September, one thousand nine hundred and ninety.



In re: George Sassower

90-3049

A motion having been made herein by the appellant pro se for writs of mandamus and prohibition, and in forma pauperis status

Upon consideration thereof, it is Ordered that said motion be and it hereby is **DENIED.**

JON JEL FXA

James M. ...
F. J. ...
July 14 ...