SUPREME COURT OF THE STATE OF NEW YORK
APPELLATE DIVISION : FIRST DEPARTMENT
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In the Matter of George Sassower, an Attorney and Counsellor-at-Law:

GRIEVANCE COMMITTEE FOR THE NINTH JUDICIAL DISTRICT,

Petitioner,

-against-

GEORGE SASSOWER,

Respondent.

----------x

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

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

I am the respondent in the above matter and submit this affidavit with respect to the Notice of Motion of the petitioner, to confirm and disaffirm, dated March 19, 1982.

1. This affidavit is submitted without prejudice to my position that the moving papers should be rejected outright since, after due deliberation, no attorney has been willing to place his or her name on petitioner's "Memorandum", or assume any responsibility for same.

It was made eminently clear at a conference with a Law Assistant of this Court on June 18, 1982, that RICHARD E. GRAYSON, Esq., Assistant Counsel for the petitioner, does not wish to assume responsibility for or place his name on such Memorandum. Analysis of said Memorandum makes the reason for such reluctance painfully clear.

2. This affidavit is also submitted without prejudice to my pending cross-motions and the action I commenced on July 30, 1982 in the United States District Court for the Southern District of New York (File No. 4970 Civ. 1982).

3. In view of the aforementioned, I will only briefly comment as to those charges which petitioner seeks to disaffirm.

CHARGE TEN

Petitioner, in its Memorandum, claims that I "commenced (two) frivolous federal actions" which (1) did not comply with the "case or controversy" requirement of Article III of the United States Constitution, and (2) the second action was commenced, although barred by the doctrine of res judicata.

1. On the contrary, both my federal actions, unquestionably complied with the "case and controversy" requirement, since both demanded substantial monetary damages.

a. Except when nominal damages are sought, a money damage demand eliminates any "case or controversy" obstacle (Federal Practice & Procedure, Wright - Cooper - Miller, §3533 p. 272-273).

Petitioner has actual knowledge of such fact, since I personally gave its counsel a copy of Clements v. Logan, U.S. n. 3, 102 S.Ct. 284, 286, 70 L.Ed.2d 461, 465 (Rehnquist, J. - Chambers), shortly after it was rendered. See also Gibson v. DuPree (664 F.2d 175, 177 [8th Cir.]).

Petitioner, incredibly, asserts its erroneous position, knowing that it cannot produce a statement from any past or present federal judge, any knowledgeable attorney in federal practice, or any case or authority supporting its assertion. In short, petitioner is fully aware that its contention is false and contrived.

Petitioner's attorney was also given a copy of Signorelli v. Evans 637 F.2d 853 [2d Cir.], clearly supporting the proposition that even if my federal complaints did not claim money damages, the "case or controversy" requirement had been met.

Petitioner, with cynical assurance, charges me with presenting "frivolous" claims because they did not meet the constitutional "case or controversy" criteria, knowing all the while that, in fact, my complaints did so comply!

Who is asserting a frivolous position, petitioner or respondent?

b. Significantly, that portion of my federal complaints which the federal courts held did not reveal concrete likelihood of future injury (and there is no requirement that each and every aspect of a complaint reveal a "case or controversy" [Powell v. McCormack, 395 U.S. 486, 496-497, 89 S.Ct. 1944, 1950-1951, 23 L.Ed.2d 491, 502], did in fact, result in far greater injury than even respondent envisioned at the time he filed his federal complaints.

On June 24, 1982, a panel at the Appellate Division of the Supreme Court, Second Judicial Department heard about the events of June 10, 1978, when my attorney-wife was incarcerated for presenting a Writ of Habeas Corpus directing my immediate release, along with my daughter, who was also incarcerated for having merely accompanied her.

Associate Justice MOSES A. WEINSTEIN, addressing Assistant Suffolk County Attorney, Erick F. Larsen, Esq., stated that these were serious charges, and asked Mr. Larsen what he had to say with respect to them.

Following is an almost haec verba recitation of Mr.Larsen's response:

> "When I [Erick F. Larsen, Esq., Assistant Suffolk County Attorney] was informed that the Sheriff had succeeded in capturing Mr. Sassower, I immediately proceeded to Jail in Riverhead. Now I have processed thousands of applications by illiterates, but this Writ of Habeas Corpus was executed by one of the most illiterate persons I have ever seen."

The law does not require that only directions from "literate" judges be obeyed, nor does it empower the Suffolk County officials to be the ex parte arbiters of the literacy of the judiciary in another judicial district of their department. Any doubt as to the literateness of the Supreme Court Justice who endorsed and signed the Writ of Habeas Corpus directing my immediate released, is rebutted by mere examination of the writ, (Exhibit "A") which is clear, legible, and evidences use of the legal language in a perfectly proper way.

Needless to say, when my wife and daughter recently moved to strike the affirmative defenses of these Suffolk County officials and for summary judgment, no substantive objections were interposed by those defendants (Supreme Court, Westchester County, Index No. 3607-1979).

2. Petitioner claims that my second federal action, although based on facts arising after dismissal of my first action, was barred by the doctrine of res judicata.

a. By definition and rudimentary logic, res judicata can never apply to subsequently arising events, (petitioner itself has admitted that the sequence of events described in its Memorandum is incorrect [Exhibit "B"]).

b. Cohen v. Board of Education (84 A.D.2d 536, 537, 443 N.Y.S.2d 170, 172 [2d Dept.]) is clearly decisive against petitioner.

In short, petitioner charges me with presenting a claim barred by res judicata, when res judicata was manifestly inapplicable!

Who is asserting a frivolous position, petitioner or respondent?

3a. Even more compelling -- subsequent to the disposition of my actions, the federal courts adopted my precise reasoning (Gomez v. Toledo, 446 U.S. 635, 100 S.Ct. 1920, 64 L.Ed.2d 572; Dennis v. Sparks, 449 U.S. 24, 101 S.Ct. 183, 66 S.Ct. 185; Lopez v. Vanderwater, 620 F.2d 1229 [7th Cir.], cert dis. 449 U.S. 1028, 101 S.Ct. 601, 66 L.Ed.2d 491; Rankin v. Howard, 633 F.2d 844 [9th Cir.], cert den. 451 U.S. 939, 101 S.Ct. 2020, 68 L. Ed.2d 772; Beard v. Udall, 648 F.2d 1264 [9th Cir.]).

b. Presumably, petitioner's position is that I violated DR 7-102(A)(1), which provides:

> " ... [A] lawyer shall not file a suit, assert a position ... or take other action ... when he knows or when it is obvious that such action would serve merely to harass or maliciously injure another."

As a matter of law, there is absolutely no basis for this charge against me.

I respectfully request that petitioner be required to justify its position on this charge, since the evidence reveals that petitioner, not respondent, is advancing a frivolous legal position.

I respectfully suggest that it is because everyone associated with petitioner so well knows its position on this charge is specious and frivolous, that no attorney will place his name or assume responsibility for its Memorandum.

CHARGE SIX

Petitioner claims that by moving to disqualify Surrogate Ernest L. Signorelli, I "engaged in frivolous litigation".

1. Petitioner admits that a litigant has a right to have a judge testify (Dennis v. Sparks, supra; U.S. v. Hastings, 681 F.2d 706, 710-712 [11th Cir.]. The doctrine of "judicial immunity" is concerned only with potential liability for monetary damages and is unrelated to a judge's duty to testify as a witness on competent issues (cf. Jade v. C.I.T., 87 A.D.2d 564, 448 N.Y.S.2d 194 [1st Dept.]).

Petitioner states in its Memorandum (p.7):

> " The Grievance Committee is cognizant that testimony and documentary evidence point to the fact that respondent was, in fact, thought of (by most, if not all of the attorneys and the Surrogate involved) as the executor ..."

Surrogate Signorelli admitted that on October 21, 1976 (seven months after my alleged removal), he "directed me to culminate the sale of the deceased's real property" (Testimony by Surrogate Signorelli on Oct. 30, 1981, SM 11).

Obviously, Surrogate Signorelli made such direction in clear recognition that I was the executor at the time. Yet, four months following, i.e., on March 17, 1977, after I entered into a contract of sale pursuant to his earlier direction, he incredibly stated that I had no authority to do so and nullified the transaction (Oct. 30, 1981, SM 13).

As the Referee, Hon. ALOYSIUS J. MELIA, found (Report p. 61):

> " Indeed, in this period, on October 21, 1976, on the record, the Surrogate ordered the respondent to sell the house. He could only do so as executor. (Ex. BP)
>
> The respondent prepared and entered into a contract to sell on December 2, 1976. The Surrogate then aborted the deal.
>
> More than a year later, after paying additional taxes, the Public Administrator sold the house to the same party for the same price."

As the Referee also found (Report p. 60-61):

> " The Public Administrator was not named to replace the respondent until 1 year later, on March 25, 1977. (Ex. 24)
>
> In the intervening year, court transcripts of proceedings before the Surrogate, amply demonstrate that participants in the proceedings considered the respondent to still be the executor.

> Abuza so testified here. Though he was the one who brought the motion to have respondent removed, he believed, that when the respondent filed an accounting within the 30 day period, that he had been restored as executor as well, and acted accordingly.
>
> Wruck, a special guardian and others, so referred to the respondent on several occasions in the record of proceedings before the Surrogate.
>
> ...
>
> On July 6, 1976, papers were prepared by the respondent in the court room, by court personnel, and signed by the Surrogate. These papers purportedly still recognized the respondent as executor. (Ex. CD) (Ex. AR)"

Respondent wanted Surrogate Signorelli disqualified so that he could be compelled to testify as a witness for the proposition that he had recognized me as an executor for a period of one year after the contrived thereafter removal fiction and that he had expressly directed me, as executor, to sell the real property.

Surrogate Signorelli refused to recuse himself because he knew if he did, he would then have no excuse for not testifying under oath and his misdeeds exposed thereby.

The Surrogate persisted in his refusal until February 1978, when, as a result of repondent's application in federal court, he was virtually forced to disqualify himself.

There was no motion pending for decision when Signorelli published his diatribe of February 24, 1978 (see Matter of Haas, 33 A.D.2d 1, 304 N.Y.S.2d 930 [4th Dept.], app. dis. 26 N.Y.2d 646, 307 N.Y.S.2d 671). The publication was intended to defame respondent and his wife, prejudice other judicial proceedings, and compel petitioner to proceed with a previous complaint against respondent filed by one of his appointees.

Surrogate Signorelli was replaceable in the event he disqualified himself, and had no "duty to sit" (Laird v. Tatum (409 U.S. 824, 837, 93 S.Ct. 7, 15, 34 L.Ed.2d 50, 60). Ironically, it was his own publicly disseminated and vindictively inspired disciplinary proceedings, which finally compelled him to testify, thereby exposing his duplicity.

2. There were other reasons for the disqualification of Surrogate Signorelli, including a manifest, extraneous bias.

Surrogate Signorelli knew that the reasons set forth by respondent in his disqualifying affidavit were true. Consequently, he set about to destroy or secrete such judicially filed affidavit and other public documents exculpatory to respondent. The Referee believed that respondent's disqualifying affidavit was sufficiently significant to publish it in haec verba, as part of His Honor's Report (p. 68-72). Surrogate Signorelli also must have found it sufficiently significant so as to warrant its destruction.

Here too, as a matter of law, there is not a shred of factual or legal basis for this charge against respondent.

Once again, I respectfully request, that petitioner be compelled to justify its position on this charge, since the evidence indicates that it is the petitioner who belongs in the dock (with Ernest L. Signorelli), not respondent, for advocating a frivolous legal position.

I respectfully reiterate that everyone associated with petitioner knows its position on this charge is specious and frivolous, and hence refuses to append his name to its Memorandum or assume responsibility therefor.

Charge Eight

Petitioner, in its Memorandum, claims that respondent was "contemptuous of the Suffolk County Surrogate's Court and of the Surrogate" because (p. 9):

> " As Surrogate Signorelli testified on October 22, 1981 at this disciplinary proceeding, the respondent '... stated he would not obey the order.' (P. 31)."

Respondent knows that everyone (except for Surrogate Signorelli), who has read the transcript, as set forth in Paragraph 54 in petitioner's amended petition, has concluded that I did not state I would disobey. I venture to add that even Surrogate Signorelli has come to the same conclusion, but he, nonetheless, apparently feels compelled to lie about this fact also.

There is not a member of petitioner's committee or its counsel's office willing to assert that such transcript states I "would not obey the order".

The fact is, on June 15, 1978, the very day of the colloquy, immediately upon its termination, which is only partially transcribed, I did obey the Signorelli's order.

Petitioner, in its Memorandum, in moving to confirm Charge Four states (p. 5):

> " Anthony Mastroianni (Suffolk County Public Administrator), testified ... that the material he (thereafter) received ... appeared to duplicate what he already had (already received from me on June 15, 1977). ... Fatal to this charge is Mastroianni's testimony ... that he does not know if there are any missing documents."

Petitioner's position on this Charge is based solely, and knowingly, on Surrogate Signorelli's false and contrived reading of the transcript.

As a matter of law, not a scintilla of truth attaches to this charge against me.

Once again, I respectfully request that petitioner be compelled to justify its position on this charge, since the evidence indicates that it is the petitioner (with Ernest L. Signorelli), who should have faced charges for advancing a frivolous legal position, not respondent.

I respectfully suggest that everyone associated with petitioner knows its position on this charge too is contrived and deceitful, and thus, consequently no one desires to place his name or assume responsibility for its Memorandum.

Petitioner is playing "fast and loose" with this Court when it bases its motion to disaffirm, not on what I said, but on what Signorelli testified I said, all the while knowing that the testimony of Signorelli is false.

Charge Three

Petitioner contends in its Memorandum, that I "failed to file promptly (my) accounting".

A. The basic facts underlying this charge are undisputed:

1. From the very outset, Charles Z. Abuza, Esq., had in his possession a copy of my letter to a third party revealing that I was having difficulty obtaining the needed information from the decedent's accountant, who claimed a lien on the records and would not supply the required information because of monies allegedly due him from the testator.

2. Charles Z. Abuza, Esq., through his client, who personally knew the accountant, tried to obtain information from him, but was also unsuccessful.

3. Any and all information that I had, I gave to Charles Z. Abuza, Esq. He never requested an explanation of the information that I gave him or ever requested any further information that I actually had.

4. Charles Z. Abuza, Esq. refused to agree to the payment of any sum of money to the accountant in order to resolve this impasse.

5. Nevertheless, knowing that I could not comply because of the aforesaid, Charles Z. Abuza, Esq., made motions to compel me to account, by gross misrepresentations to the Courts.

6. Employing some diplomacy and patience, I was able to obtain the needed information, albeit about five months after the accounting was due. During this period Mr. Abuza's client, consented to the extension of time and wrote to the court confirming same (Report 48-49). During much of this period Mr. Abuza's client generally cooperated with respondent in trying to resolve the outstanding disputes by various claimants and in the attempts to obtain information from the accountant.

7. A copy of the accounting was given to Charles Z. Abuza's firm within one day after the information was received from the accountant and the original sent to Surrogate's Court.

8. There was no legitimate need for this accounting in the first place, and it represented a needless effort.

9. There was no prejudice to anyone in any respect.

Decisive is that no one, including petitioner, has ever suggested, any feasible or better alternative route that I might have employed, given the conceded circumstances.

A resume of this subject by Hon. ALOYSIUS J. MELIA, in his Report is as follows:

1. The statement by petitioner's counsel regarding the activities of Charles Z. Abuza, Esq., concludes as follows (p. 12):

> " To attempt to catalogue and analyze every false and misleading statement to a document prepared by the Schacter [Charles Z. Abuza, Esq.] firm ... would be a Herculean task and only belabor the point."

2. The comments by His Honor, capsulized, follows (p. 13-15):

> "I find it difficult to believe anything that Mr. Abuza said ... Mr. Sassower was cooperative and was always willing to be. ... Mr. Abuza admitting here that in many instances there were false statements in papers submitted by him to these judges, which, indeed, would tend to excite them. ... [Mr. Abuza's] testimony is replete with falsehoods, half truths and misleading statements, and that is true of the papers that he submitted to the various courts. ... A further word is necessary here about the 'accountings' referred to, because they also relate to charge three.
>
> First, the respondent had difficulty amassing necessary information. For a time ... the deceased's accountant would not cooperate. The respondent sought Abuza's assistance in this regard but Abuza did nothing. Edward Kelly, Abuza's client, admittedly tried to enlist [the accountant's] cooperation but was also unsuccessful."

3. Specifically with respect to Charge Three, His Honor reported (p. 46-51):

> " The respondent undertook and carried out his responsibilities. Over a period of time several objections to probate were settled and the will was admitted to probate on September 9, 1974. Full letters testamentary were issued to the respondent. ...
>
> On November 13, 1974, Edward Kelly, by counsel [Charles Z. Abuza, Esq.] filed a petition for a compulsory accounting.

It is crystal clear, from petitioner's witnesses, concessions and documentary evidence, that [Ed] Kelly and his counsel [Abuza] knew that the respondent could not intelligently account until he had the cooperation of ..., the deceased's long time accountant. Indeed Kelly himself sought [the accountant's] aid, at the respondent's urging, but was also unsuccessful. Abuza, too, admittedly was aware of this problem but did nothing to aid.

He [Abuza] resorted to a motion for a compulsory accounting. The sin charged is that the respondent did not provide information which they knew he did not have. (emphasis supplied) ...

However, prior to May 1, 1975 [when the accounting was due], Mr. Abuza, had already sent an affidavit for Kelly's signature, seeking to hold the respondent in contempt for failure to file the accounting and requesting his removal as executor. ...

The respondent filed the accounting on December 20, 1975.

It does not appear that the delay caused prejudice or loss to anyone other than legal expenses for petitioner's counsel [Abuza]. Indeed, in the interim, the respondent settled 5 claims and gained [the accountant's] limited cooperation. He was thereby enabled to account to some extent.

Parenthetically, it should be noted that, Anthony Mastroianni, the Public Administrator, replaced the respondent on March 29, 1977. He did not file any accounting until April 1980, though he had no more information in 1980 than he did in March 1977. ...

Mr. Abuza complained here that during this period, the respondent did nothing about selling the house. Documentary evidence destroys this claim.

As earlier set forth, Mr. Abuza was aware, both from knowledge obtained from his own client and from the respondent, that [the accountant] was uncooperative and that the respondent was endeavoring to settle claims of creditors and difference(s) between the parties.

However, Mr. Abuza takes the position that the respondent should have haled [the accountant] into court and forced him to divulge the requisite information.

The respondent countered that such action would have been costly to the estate, estranged the most knowledgeable person about the estate assets, occasioned delay and thwarted the respondent's efforts to woe [the accountant]. In these efforts he ultimately prevailed.

The respondent takes the position that it is not customary to file intermediate accountings in 'small' estates such as this one, absent unusual circumstances. None such existed here. The better practice was to file only a final accounting. This procedure, he argues would save court time, lawyers' fees and benefit legatees.

This argument was not seriously challenged here by anyone. Nor were unusual circumstances demonstrated. The genesis for an accounting arose from adversarial attorneys with no showing for need, other than a clamor for an accounting. This, despite the fact that all had knowledge of the practical problems facing respondent in this regard. ...

Under all of the facts and circumstances, I do not believe that it can be said, as a matter of ethical concern, that the filing of the report was not prompt and timely. If so, ethically, it is excusable.

According, it is respectfully recommended that this charge be dismissed."

I repeat, petitioner has never and does not now advance any practical, alternative route that I should or could have taken.

B. Petitioner blithly ignores the Report of the Referee (p. 48-49) and the written confirmatory documentary evidence (Exhibits 31-33), which caused His Honor to further state (p. 49):

"So Kelly and his counsel acquiesced in the delay."

On November 13, 1975, Edward Kelly himself wrote to Surrogate's Court and stated (Exhibit 33):

"Due to the fact that another matter has to be settled before an accounting can be made by Mr. George Sassower, it is my desire that the above motion be adjourned for one month."

In a private postcript to the copy he sent to his attorneys, and taken from Mr. Abuza's own file, Mr. Edward Kelly added (Exhibit 33):

"... We need more time in order to take care of a few more details before an accounting can be made."

This charge, like the prior ones, is a hoax, a sham, in sum, an utter imposition on the Court and myself, as a matter of law, it should be dismissed.

I again respectfully request that petitioner be compelled to justify its position on this charge, since the evidence indicates that it is the petitioner, who belongs in the dock (with Charles Z. Abuza, Esq.) for advancing a frivolous legal position, not respondent.

As to this charge also, everyone associated with petitioner knows that, at best, as His Honor stated, the offense charged is that I did not supply information that Abuza and petitioner knew I did not have.

Likewise, once more the facts reveal the reason no one associated with petitioner desires to place his or her name on its "Memorandum".

Conclusion

I am unaware of any area wherein this Court has been granted such non-reviewable, extensive, exclusive, judicial, executive, legislative, and prosecutorial power. The federal courts have articulated a policy of unmatched restraint in this field, more compatible with abdication, than abstention.

Were this Court to employ its powers to the fullest, it could still not begin to compensate me for the horrendous loss of time, money, and human emotion which this matter has cost, and continues, to cost me and my family.

I leave to this Court to fashion the remedy to redress the enormous wrong done. It must be remembered that the charges as to which I have been already been vindicated (and which petitioner moves to confirm), and more, were published in violation of Judiciary Law §90[10], compounding the damage.

In the event I am completely vindicated (as recommended by His Honor), the law -- if it takes it prescribed course -- would have such exoneration confidential, while the accusation is irretrievably in the public domain.

The meritless nature of the four charges petitioner seeks to disaffirm speaks volumes for the lack of quality of the other ten charges which petitioner abandoned, or moves to confirm.

WHEREFORE, I respectfully pray for an Order and Judgment according to law and to this Court's good conscience.

GEORGE SASSOWER

Sworn to before me this
15th day of September, 1982

MURIEL GOLDBERG
Notary Public, State of New York
No. 60-4515474 Westchester County
Commission Expires March 30, 1983

GEORGE SASSOWER,

Petitioner

against

SHERIFF OF THE COUNTY OF SUFFOLK,

Respondent

WRIT OF HABEAS CORPUS

The People of the State of New York

Upon the relation of GEORGE SASSOWER

TO SHERIFF OF THE COUNTY OF SUFFOLK Greeting:

WE COMMAND YOU, That you have and produce the body of GEORGE SASSOWER by you imprisoned and detained, as it is said, together with your full return to this writ and the time and cause of such imprisonment and detention, by whatsoever name the said person shall be called or charged before you or one of the Justice Presiding, Special Term Pt. I Justices of the Supreme Court of the State of New York county of Westchester at 111 Grove Street, White Plains, N.Y. in the courthouse thereof on the 12th day of June 19 78 at 9:30 AM. to do and receive what shall then and there be considered concerning the said person and have you then and there this writ.

WITNESS, Hon. Anthony J. Ferraro the day of 19 one of the justices of our said Court

Pending a final determination of the petition of Petitioner in the above entitled proceeding on his own recognizance

Anthony J. Ferraro
J.S.C.

Anthony J. Ferraro, J.S.C.

GEORGE SASSOWER, Esq.

Attorney(s) for Petitioner

Office and Post Office Address

75 Wykagyl Station
New Rochelle, New York, 1(

The within writ is hereby allowed this day of 19

J. C.

Per Judge executed June 10 1978

EFL

Exhibit "A"

SUPREME COURT OF THE STATE OF NEW YORK
APPELLATE DIVISION : FIRST JUDICIAL DEPARTMENT

In the Matter of GEORGE SASSOWER, an Attorney and Counsellor-at-Law:

GRIEVANCE COMMITTEE FOR THE NINTH JUDICIAL DISTRICT,

Petitioner,

-against-

GEORGE SASSOWER,

Respondent.

SUPPLEMENTAL AFFIDAVIT

STATE OF NEW YORK)
COUNTY OF WESTCHESTER) ss.:

RICHARD E. GRAYSON, being duly sworn, deposes and says:

1. I am assistant counsel to petitioner, the Grievance Committee for the Ninth Judicial District, and submit this affidavit to correct one misstatement in petitioner's Memorandum of Law dated March 19, 1982 and submitted in support of petitioner's motion of that date.

2. Page 12 of the Memorandum contains an error concerning CHARGE TEN. The Memorandum states that respondent's second Eastern District Court action was brought after the dismissal of his first Eastern District Court suit was affirmed in the Second Circuit Court of Appeals. This chronology is inaccurate. In fact, both suits were dismissed by Judge Mishler (Exhibits 65-67)

Exhibit "B"

before the Second Circuit affirmed his decision (Exhibit 68).

3. This correction does not alter petitioner's motion to disaffirm the recommendation in CHARGE TEN.

Richard E. Grayson

Sworn to before me this 29th
day of March, 1982.

REBECCA LYNN STANLEY
Notary Public, State of New York
No. 4734058
Qualified in Westchester County
Term Expires March 30, 19