STATE OF NEW YORK SUPREME COURT, APPELLATE DIVISION ATTORNEY GRIEVANCE COMMITTEE THIRD JUDICIAL DEPARTMENT

COMPLAINT FORM

October 24, 2024

COMPLAINANT INFORMATION:

Name: Elena Ruth Sassower,

Director/Center for Judicial Accountability, Inc. (CJA)

Street Address: 10 Stewart Place, Apt. 2D-E

White Plains, New York 10603

Telephone: (914) 421-1200 Cell: (646) 220-7987

E-Mail: elena@judgewatch.org

ATTORNEY COMPLAINED OF:

Name: Assistant Solicitor General Beezly James Kiernan

(registration #5518543 – admitted in Third Department/April 27, 2017)

Address: New York State Office of the Attorney General

The Capitol

Albany New York 12224

Telephone number: (518-776-2023) E-Mail: Beezly.Kiernan@ag.ny.gov

CONTACT WITH OTHER AGENCIES

Have you contacted any other agency, such as a Bar Association, another Grievance Committee, Attorney General's Office, or any other State Agency concerning this matter? If yes, state the name of the agency and what action was taken.

In addition to a complaint against Deputy Solicitor General Andrea Oser, simultaneously filed with this Grievance Committee, complaints against Attorney

General Letitia James and Solicitor General Barbara Underwood are being filed with the Appellate Division, First Department Attorney Grievance Committee.

COURT ACTION TAKEN BY YOU AGAINST THE ATTORNEY

Have you taken any civil or criminal action against the attorney? If so, please name the court and provide the index number. What is the status of the matter and/or what action was taken by the Court?

Yes. The "court action" taken against Assistant Solicitor General Kiernan was in the forum in which his litigation fraud was committed, at the Appellate Division, Third Department in appeal #CV-23-0115. It consisted of motions for sanctions and other relief against him, including referral to ethics and criminal referral authorities.

The Appellate Division, Third Department denied these motions without decision, facts, or law.

ALLEGATIONS

Explain your complaint against the attorney in as much detail as possible...Please provide a digital copy of all relevant documents...written communications (letters and e-mails) to and from the attorney, and the names of any witnesses and their contact information (address, telephone number, and email)."

See accompanying October 24, 2024 complaint. The Appellate Division's <u>NYSCEF Docket #CV-23-0115</u> and its <u>VIDEO of the April 22, 2024 oral argument</u> are "digital" originals of everything.

To preserve live hyperlinks, signature and attestation of truth are on the next page.

Complainant's Signature (Required):

The foregoing complaint, with substantiating hyperlinks, is affirmed as true under penalties of perjury, pursuant to CPLR §2106.