



New York State Commission on
Ethics and Lobbying in Government
540 Broadway
Albany, New York 12207

COMPLAINT

The Commission on Ethics and Lobbying in Government has jurisdiction to investigate potential violations of Public Officers Law § 73, § 73-a, § 74, Civil Service Law § 107, and Legislative Law article 1-A as they apply to State legislators, candidates for the Legislature and legislative employees, as well as the four statewide elected officials, candidates for those offices, executive branch employees, certain political party chairs, and lobbyists and their clients.

COMPLAINANT NAME

Elena Sassower ^{Director -}
Center for

ADDRESS

Box 8101

CITY, STATE, ZIP

White Plains, NY 10602

TELEPHONE

914-421-1200

EMAIL

elena@judgewatch.org

Please provide a statement or description of the alleged violation of Public Officers Law § 73, § 73-a, § 74, Civil Service Law § 107, or Legislative Law article 1-A including facts constituting a violation of the law(s) above, the identity of the individual(s) at issue, the agency where the individual(s) work, and, if possible, a date, time, place of the alleged violation. Also note any documents or exhibits you are including to support the allegations.

See attached September 30, 2026
written testimony constituting a
conflict of interest/corruption complaint
against COZLIC's Commissioners, Executive Director
& other high-ranking staff for "substantial
neglect of duty" & "misconduct in office" born of
flagrant violations of Public Officers Law 74.2 &
Executive Law 94.10(b) proscribing conflicts of
interest

Has this matter been referred to any other agency?



Yes



No

If yes, which agency? _____

Is there pending legal action you are aware of?



Yes



No

If yes, where? _____

depends
on
interpretation
of these
questions



New York State Commission on
Ethics and Lobbying in Government
540 Broadway
Albany, New York 12207

Complaint Additional Page

This complaint form +
attached September 30, 2026.
testimony/complaint with
substantiating hyperlinks
are affirmed as true
under penalties of perjury
pursuant to CPLR 2106.1

Eric R. D'Amore
September 30, 2026
White Plains, NY

CENTER for JUDICIAL ACCOUNTABILITY, INC.

Post Office Box 8101
White Plains, New York 10602

Tel: 914-421-1200

E-Mail: mail@judgewatch.org
Website: www.judgewatch.org

A Tale of Seven Complaints – & Now Eight

Written Testimony/Complaint for the September 30, 2026 Fourth Annual Hearing of the Commission on Ethics & Lobbying in Government (COELIG)

I am Elena Sassower, director of the non-partisan, non-profit citizens' organization Center for Judicial Accountability, Inc. (CJA). Our website is www.judgewatch.org, and from its left side panel "Testimony", you can find a link for this testimony entitled "A Tale of Seven Complaints – & Now Eight" and to the open-and-shut, *prima facie* EVIDENCE substantiating it.

At each of your three prior annual hearings, in [2023](#), [2024](#), and [2025](#), I summarized the complaints CJA had filed with you, all involving the statute-violating, "false instrument" reports that have given salary increases to New York's state-paid judges, to New York's four statewide executive officers, to New York's 213 state legislators, to New York's Executive Law §169 officers – and, based thereon, to others, such as New York's 62 D.A.s, the New York State Inspector General – and to yourselves for increased *per diems* and, by your authorization, to your executive director for increased salary.¹

My today's testimony at this, your fourth annual hearing, like my testimony at your second and third annual hearings, is additionally and expressly a complaint against you, your executive director, and senior staff for corruption, born of your flagrant violations of [Public Officer Law §74.2](#) and [Executive Law §94.10\(b\)](#), proscribing conflicts of interest, of which you have a multitude, none of which you have disclosed.² Based on your conflict-of-interest-driven corruption, established

¹ The price tag of these statute-violating "false instrument" reports, since the first took effect, by "force of law", on April 1, 2012, is on the order of a billion dollars.

² As for [my testimony at your first annual hearing](#), it stated that I would be filing a complaint:

"against you, to you, for your 'substantial neglected of duty' and 'misconduct in office' ^{fn2}
from your first meeting last September 12th to date – 6-1/2 months later – arising from your willful violations of [Public Officers Law §74](#), proscribing conflicts of interest that is your duty to enforce as to others,^{fn3} and of [Executive Law §94.10\(b\)](#) explicitly mandating that you each disclose personal, professional, and financial conflicts of interest with respect to complaints – and recuse yourselves or be recused by vote of your fellow commissioners.^{fn4}"
(underlining and hyperlinking in the original).

[It was not until October 2, 2023 that I filed the complaint](#), explaining that I had deferred doing so "to give you

resoundingly by your handling of all CJA's prior complaints and your deceit and disregard, totally, of all my prior testimony, including with respect to your self-promoting "false instrument" annual reports, you must not only be removed from office for "substantial neglect of duty" and "misconduct in office", but criminally prosecuted for your penal law violations, destroying constitutional, lawful state governance and massively and irreparably injuring the People of the State of New York.

Your most recent annual report, your fourth, is your [Annual Report for 2025](#). Beneath the title "2025 Commission Resolutions" (at p. 54), it links to your [Resolution 25-02](#), giving a \$25,000 salary boost to your executive director based on the Commission on Legislative, Judicial and Executive Compensation's November 14, 2024 Report, without revealing that it is a statute-violating fraud, proven by [CJA's February 27, 2025 complaint](#) that you have been "sitting on" and as to which I stated, in [testifying last year, at your September 25, 2025 hearing](#), that I had "received no acknowledgment, no complaint number, indeed, no communication of any sort about the complaint" (at p. 4).

According to the chart at page 112 of your Annual Report for 2025, you received 144 "Tips/Complaints/Referrals" in 2025. Another chart immediately follows (at pp. 113-140) entitled "2025 Enforcement Activity", purporting to be "all matters incepted, closed, or settled in 2025".

What does this second chart show with respect to the two complaints CJA filed in 2025?

The first of these, [CJA's February 27, 2025 complaint](#) against the Commission on Legislative, Judicial and Executive Compensation based on its November 14, 2024 Report, is reflected at page 127 of the chart as case number "25-02456", formerly "(25-032)", identifying its "Status" as "Pending".

CJA's second 2025 complaint is [my written testimony at your September 25, 2025 annual hearing](#), expressly identifying itself (at pp. 5-6) as a complaint against then New York State Assemblyman Zohran Mamdani, running to be elected New York City mayor, and against then New York State Senator Brad Hoylman, running to be elected Manhattan borough president – requiring the greatest expedition by reason thereof – and against "you, your executive director, your general counsel, and other high-ranking staff", further identifying this to be CJA's third complaint against all of you – the two predecessors being [CJA's October 2, 2023 complaint](#) and [November 13, 2024 complaint](#).

As to this [September 25, 2025 complaint](#), I have not found it anywhere in the chart entries for 2025 complaints.³ **Where is it? What is its number, about which I inquired by [my February 9, 2026](#)**

the opportunity to take steps to rectify the violations that my March 29, 2023 testimony summarized and evidentiarily-established", which you had "not done", and that "the final straw, prior to your September meetings, was your issuance...of your misnomered [2022 Annual Report](#),...largely a first-year report, ...whose material fraudulence [had been] proven, resoundingly, by my testimony."

³ These chart entries, spanning from pp. 123-140, reflect that in 2025 you introduced a new numbering system, so that the first complaint/tip/referral received for 2025 is now "25-02425" not "(25-001)". This dual numbering continues to "25-02552", formerly "(25-128)", with the next entry (at p. 139) **skipping 225**

FOIL request and which you did not include in your March 4, 2026 response.

As for what the chart shows as to your activity in 2025 with respect to CJA's prior complaints, such can be discerned – or not – by using the numbers obtained from your March 4, 2026 FOIL response:

- for CJA's October 29, 2024 complaint, stated by your March 4, 2026 response as assigned the number **24-141**, the chart (at p. 122) **skips 24-141** – and this is additionally significant because your November 7, 2024 response to my October 7, 2024 FOIL request identified **24-141** as the number assigned to CJA's January 29, 2024 complaint;
- for CJA's November 13, 2024 complaint, stated by your March 4, 2026 response as assigned the number **24-147**, the chart (at p. 122) **skips 24-147**;
- for CJA's February 27, 2025 complaint, stated by your March 4, 2026 response as assigned the number **25-032** and, shockingly, as being the “same complaint” as CJA's January 29, 2024 complaint and, therefore, “superseded[ing]” it, the chart (at p. 127) identifies the number as “Pending”.

Is CJA's September 25, 2025 complaint also “Pending”?

When were you planning to determine these conflict-of-interest/ethics complaints, each facially meritorious and furnishing, *as required*, “specific and credible evidence”. Have you even sent out 15-day notices – the starting point for “investigation” pursuant to Executive Law §94.10(f). THE STARTING POINT.

I affirm this testimony and the complaint it embodies against you as true, under penalties of perjury, pursuant to CPLR §2106.

Thank you.

numbers to “25-02807”, followed by 11 sequential entries to “25-02818” (at p. 140), thereupon **skipping 27 numbers to “25-02845, then **skipping 1 number** to “25-02847” and then **skipping 1 number** to “25-02849, for a total of 254 unaccounted-for entries. What are these?**