

90-8561

COMPLAINT FORM

JUDICIAL COUNCIL OF THE SECOND CIRCUIT

COMPLAINT AGAINST JUDICIAL OFFICER UNDER 28 U.S.C. § 372(c)

INSTRUCTIONS:

- (a) All questions on this form must be answered.
- (b) A separate complaint form must be filled out for each judicial officer complained against.
- (c) Submit the correct number of copies of this form and the statement of facts. For a complaint against:
  - a court of appeals judge -- 3 copies
  - a district court judge or magistrate -- 4 copies
  - a bankruptcy judge -- 5 copies
 (For further information see Rule 2(e)).
- (d) Service on the judicial officer will be made by the Clerk's office. (For further information See Rule 3(a)(1)).
- (e) Mail this form, the statement of facts and the appropriate number of copies to the Clerk, United States Court of Appeals, United States Courthouse, Foley Square, New York, New York 10007.

RECEIVED  
 1990 OCT 29 AM 11:56  
 U.S. COURT OF APPEALS  
 SECOND CIRCUIT

1. Complainant's name: George Sassouf

Address: 16 Lake Street  
White Plains NY 10603

Daytime telephone (with area code): (914) 949-2169

2. Judge or magistrate complained about:

Name: U.S. District Judge William C. Connor

Court: Southern Dist. of New York

3. Does this complaint concern the behavior of the judge or magistrate in a particular lawsuit or lawsuits?

[ ] Yes [  ] No

If "yes," give the following information about each lawsuit (use the reverse side if there is more than one):

Court: \_\_\_\_\_

Docket number: \_\_\_\_\_

Docket numbers of any appeals to the Second Circuit: \_\_\_\_\_

Did a lawyer represent you?

[ ] Yes [  ] No

If "yes" give the name, address, and telephone number of your lawyer:

*N/A.*

4. Have you previously filed any complaints of judicial misconduct or disability against any judge or magistrate?

[  ] Yes [ ] No

If "Yes," give the docket number of each complaint.

*87-1503, 90-8556, 90-8557.*

5. You should attach a statement of facts on which your complaint is based, see rule 2(b), and

EITHER

(1) check the box and sign the form. You do not need a notary public if you check this box.

I declare under penalty of perjury that:

(1) I have read rules 1 and 2 of the Rules of the Judicial Council of the Second Circuit Governing Complaints of Judicial Misconduct or Disability, and

(2) The statements made in this complaint and attached statement of facts are true and correct to the best of my knowledge.

\_\_\_\_\_  
(signature)

Executed on \_\_\_\_\_  
(date)

*George S. Savelle*  
*Oct. 29, 1990*

OR

(2) check the box below and sign this form in the presence of a notary public;

I swear (affirm) that--

(1) I have read rules 1 and 2 of the Rules of the Judicial Council of the Second Circuit Governing Complaints of Judicial Misconduct or Disability, and

(2) The statements made in this complaint and attached statement of facts are true and correct to the best of my knowledge.

\_\_\_\_\_  
(signature)

Executed on \_\_\_\_\_  
(date)

Sworn and subscribed to  
before me \_\_\_\_\_

\_\_\_\_\_  
(Notary Public)

My commission expires:

U.S. District Judge WILLIAM C. CONNER  
28 U.S.C. §372(c)

1a. This complaint does not concern itself with the corruption of U.S. District Judge WILLIAM C. CONNER ["Conner"] in rendering his trialess, without any pre-trial disclosure, decision in Raffe v. Doe (619 F. Supp. 891 [SDNY-1986]), in which the complainant was not a party nor his personal interests an issue.

b. Notwithstanding the right granted to complainant to appeal, expressly granted in the Judge Conner opinion, the complainant was denied that right by the Circuit Court when HYMAN RAFFE ["Raffe"], in exchange for not being incarcerated, agreed to discontinue his appeal, execute releases to federal judges, and pay many millions of dollars to his self-proclaimed criminal prosecutors.

2a. An inexorable consequence to the Judge Conner published opinion in Raffe v. Doe (supra) was that FELTMAN, KARESH, MAJOR & FARBMAN, Esqs. ["FKM&F"] and KREINDLER & RELKIN, P.C. ["K&R"] would have to continue, without end, their course of judicial and official corruption.

b. Although Judge Conner held no trials or hearings, His Honor was repeatedly informed, in the most emphatic but respectful manner, that the complainant would have absolutely no part in the corrupt activities of FKM&F-K&R entourage and complainant's resolve to resist same.

c. During the approximate sixteen (16) months that the proceedings were before Judge Conner, from the papers and conferences, Judge Conner was very well aware of the criminal racketeering activities of the K&R-FKM&F mobsters.

d. Thus, Raffe v. Doe (supra), as Judge Conner was actually aware, was simply a station in the route of unending judicial corruption.

3a. Few crimes are as odious as a judge who has been corrupted, a crime punishable by death at common law.

b. However, when a judge employs his exalted position and black robe to corrupt his colleagues, the crimes are quantum leaps much higher.

c. Thus, this complaint concerns itself with the attempts by Judge Conner to corrupt others for which only one instance is set forth herein.

4a. Complainant was aware of Judge Conner's activities in corrupting other jurists, but the need to keep the sources of his information confidential, compelled his relative silence.

b. Complainant's patience proved rewarding.

5a. Shortly after the assignment of the complainant's civil action to U.S. District Judge CHARLES S. HAIGHT, JR. ["FKM&F"] there was an ex parte meeting between FKM&M and Judge Conner wherein Judge Conner agreed to "fix" Judge Haight.

b. By this point in time, every criminal desire of FKM&F and K&R -- "the felons with law degrees" -- was blithely complied with by Judge Conner.

c. These requests by "the felons with law degrees" generally related to improperly influencing other jurists.

6a. Judge Conner arranged that a criminal contempt proceeding against complainant be referred to Judge Haight.

b. Even a criminal contempt proceeding, with its more exacting command for judicial integrity, was not a sufficient obstacle to compel Judge Conner's abstinence from his "fixing" activities.

c. Thus, ex parte, Judge Conner forwarded to Judge Haight his Memorandum of October 21, 1987 (Exhibit "A"), with copies to Chief Judge Charles L. Brieant, Judge Edward Weinfeld, Judge Whitman Knapp, Judge Howard Schwartzberg, and Judge L. Coettel.

Copies were also sent to Ms. Dorothy R. Guranich and Mr. Raymond K. Sexton.

Complainant was reliably informed that a blind copy was sent by Judge Conner to FKM&F or that they were made aware by Judge Conner that such "fixing" missive had been sent.

d. Complainant does not have the foggiest idea for the mailing of copies to Judges Weinfeld and Knapp or to Ms. Guranich and Mr. Sexton, and complainant did not make any attempt to learn such reason, but it became manifestly obvious that Judge Conner had, by point in time descended to the status of a "smut peddler".

7a. The effect of this "Bill to Terry" Memorandum was immediate and dramatic, as exemplified by Judge Haight's response, and the suspect nature of such response warranted an investigation which complainant undertook.

b. This "Conner fixing Memorandum" was executed only sixteen (16) days after the complainant commenced his civil action, which was assigned to Judge Haight, and immediately after the criminal contempt charge against the complainant was assigned to Judge Haight.

8a. Three (3) years have now elapsed since the "Conner fixing Memorandum" and no remedial action has been taken by this Circuit.

b. "Fixing", by recused jurists, is obviously an acceptable in this Circuit, where those who resist and expose such practices are the ones punished.

Dated: October 29, 1990



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GEORGE SASSOWER