DISCIPLINARY COUNSEL THE SUPREME COURT OF OHIO

J. WARREN BETTIS

OFFICE OF DISCIPLINARY COUNSEL 175 South Third Street Suite 280 Columbus, OH 43215-5196 (614) 461-0256

OUR NAME	Commence of the commence of th		
DDDDCC.	Last	GEORGE SASSONER	Phone
DDRESS:	Street	White Plains, NY 10603-3852 City	
		City	
•	County	State	Zip
		ATTORNEY OR JUDGE (Please circle)	
AME: //	12.5011	Capalan. A	2) 341-20
AME:	Last	First	Phone
DDRESS:	120	DROAD WAY No	W YORK.
· · · · · · · · · · · · · · · · · · ·	Street	City My	111771
•	County	State State	Zip
OMPLAINT	FILED WIT	TH OTHER AGENCIES:	
omplaint If y Acti	? es, name c	any other agency or bar associat Yes of that agency: y that agency: te:	ion about this
OURT ACT	ION TAKEN:		
ttorney If y	or judge?	vil or criminal court action aga Yes No that court:	Det this
ITNESSES	;		
ersons whe facts	ho can sur	es, addresses and daytime telephoport your complaint and have inf	ne numbers of ormation about
	NAME	ADDRESS	PHONE
	ALL	PACIS MEONTON	
gladen + Market ngayar eth "Affellishde littlikuur de viewe dii dip najaar naar de ar aya as ili Georges dibad waa da i			
chronolog	ical order	e, explain the facts of your composition, including dates. Also, describe unethical conduct by this member copies of any correspondence as	be what you er of the legal

(Rev. 11-89)

which support your complaint.

OVER

FACTS OF THE COMPLAINT

				A
111/1000	1100	MI		Anna mana mana mana mana mana mana mana
	4	1) hall	15	
			CONTRACTOR	
		Barringson pro 1907 (1900) de con est matrochos par las est mellos la renne eléctric colocide la californique d'Est (la el Géorgia		
			2017年1日2日 - 1817年(1917年)中央市場中国国際国際公司会社(1917年)中央市場(1917年)中央市場(1917年)中央市場(1917年)中央市場(1917年)中央市場(1917年)中央市場(1917年)	
				Sing in the second for the second residual, a proper second residual and a second residual and the sec
				ilları közente elikliği varantıng isti sen aldır. Salqarında i stina is alah lakt ı ninib henne k nişin asalak istina senen mekond
			S. C. State Science, T. (1) 200 Med C. State State of National Science Science Science Science State of Science Scienc	
			·····································	
			th (Note). Typy (Phil Service entry god eng stempore up ye (2 mag oversprinkle de Proposition and Sancelo on Private and	n Berkenden i Nederland en en en en de diskripe en
	aa damanu artinuu and ming shadhaa aasi di gaalaya dha ay Barray yaay shad dhii maa baa ay gaal dhiiban walka aa shadha			
		gene praggy on a grown grow grow as grown as graden religion to represent a self-order to make the color of t		
	en de senando e como de marcialo que a como esta del productivo del primero e e de entre altre de senando en como e de productivo de esta del productivo del		PROCESSORY OF SHOWING THE TOTAL THE SHOW SHOW SHOW SHOW SHOW SHOW SHOW SHOW	
		an angan ang tanggan an ang ang ang ang ang ang ang an		
ules of the Sypreme Court o	f Ohio re	equire tha	t invest	igations be
ules of the Supreme Court of confidential and you are ask ou are submitting this comp	ed to kee	ep confide	ntial th	e fact that
A Mule			Lef//	1/992
GEORGE SASSOWER			// DA	TE

76 Lake Street White Plains, NY 10603-3852

- la. This is the basic factual background applicable to a number of lawyers within your jurisdiction, and as individually supplemented, will be employed as my disciplinary complaint against all of them.
- b(1) The facts sets forth herein have never been disputed by anyone, anywhere, or anytime, in or out of the Sixth Circuit, and therefore my extensive documentary support need not be submitted at this juncture, unless you desire otherwise.
- (2) Any portion of these disciplinary complaints based on confidential information, or which may cause the disclosure of confidential sources, have been pruned out even though additional charges could be based thereon.
- There are four (4) separate, independent but interrelated actions pending in the federal courts of Ohio, nisi prius and appellate, although two of such actions have been multifurcated under several docket numbers. These will hereinafter be identified as Action #1, #2, #3, and/or #4.
- a. Action #1, commenced in November of 1991, has as its prime and first named defendant MEAD DATA CENTRAL, INC. ["Lexis"] (Docket No. C-3-91-436).
- b. Action #2, was commenced shortly thereafter, is essentially a mandamus proceeding against U.S. Attorney D. MICHAEL CRITES ["Crites"], based upon his failure and refusal to convey to the Grand Jury my information of criminal activities in the Southern District of Ohio (In re Grand Jury Application, 617 F. Supp. 199 [SDNY-1985]) (Docket No. MC-3-91-54).
- c. Action #3 was commenced in January of 1992, whose first named defendant is Thompson, Hine & Flory ["TH&F"], and was originally based upon the corruption of U.S. Magistrate Judge MICHAEL R. MERZ ["Merz"], but was thereafter amended to include other jurists, including District Court Judge WALTER H. RICE ["Rice"] (see Dennis v. Sparks, 449 U.S. 24 [1980]) (Docket No. C-3-92-27).
- Action #4 are proceedings to compel the DAYTON BAR ASSOCIATION ["DBA"] and COLUMBUS BAR ASSOCIATION ["CBA"] to process my disciplinary complaints against, inter alia, the above (Docket No. MC-3-92-011).
- 3. Some aspects of the <u>modus operandi</u> of this powerful criminal racketeering enterprise is essential to a proper understanding of the above actions.
- a. KREINDLER & RELKIN, P.C. ["K&R"] and FELTMAN, KARESH, MAJOR & FARBMAN, Esqs. ["FKM&F"] of New York, hereinafter collectively described as "the criminals with law degrees" are involved in, with their judicial and official patrons, in the larceny of the judicial trust assets of PUCCINI CLOTHES, LTD. ["Puccini"], the diversion of monies payable "to the federal court" to private pockets, extortion and other criminal racketeering activities.
- b. The ESTATE OF EUGENE PAUL KELLY ["Kelly Estate"] has been denuded of all its assets by Suffolk County, N.Y. Surrogate ERNEST L. SIGNORELLI ["Signorelli"] his appointee, Public Administrator ANTHONY MASTROIANNI ["Mastroianni"], and their entourage, leaving nothing for the beneficiaries.
- c. DENNIS F. VILELLA ["Vilella"] was convicted and has been incarcerated for more than five (5) years for crimes that never occurred, as will be conclusively demonstrated herein.

- fraudulent decisions, lacking subject matter and/or personal jurisdiction, and due process, having them republished by, inter alia, Lexis, whose home office is in Ohio, for nationwide distribution.
- b. Thus, in Action #1, on December 6, 1991, I made a motion for a temporary restraining order, preliminary injunction and/or summary judgment as follows:

"(1) permanently enjoining MEAD DATA CENTRAL, INC. from publishing, republishing and/or distributing Raffe v. Citibank (84 Civ. 305 [EDNY-1984], aff'd without opinion 779 F.2d 37 [2d Cir.-9/13/851; Raffe v. Riccobono (113 A.D.2d 1038, 493 N.Y.S.2d 70 [1st Dept.-1985]); Raffe v. Feltman, Karesh & Major (113 A.D.2d 1038, 493 N.Y.S.2d 70 [1st Dept.-1985]) and <u>Barr v. Sassower</u> (121 A.D.2d 324, 503 N.Y.S.2d 392 [1st Dept.-1986], app. dis. 68 N.Y.2d 807, 506 N.Y.S.1d 1037 [1986]), wherever these decisions or citations might appear, unless it is stated that the aforementioned non-summary criminal contempt convictions were rendered without a trial, without the opportunity for a trial, without any live testimony in support thereof, and stating that by reason of the aforementioned, and for other reasons, the aforementioned determinations are legally null, void, and of no legal effect; (2) permanently enjoining MEAD DATA CENTRAL, INC. from publishing, republishing and/or distributing Sassower v. Sheriff (824 F.2d 184 [2nd Cir.-1987]), wherever this decision or citation might appear, unless it is stated that the aforementioned non-summary criminal contempt conviction was rendered without a trial, without the opportunity for a trial, without any live testimony in support thereof, anything factually stated in such opinion to the contrary having been intentionally and deliberately fabricated, concocted and contrived, and stating that by reason of the aforementioned, and other reasons, the said determination to be legally null, void, and of no legal effect; (3) permanently enjoining MEAD DATA CENTRAL, INC. from publishing, republishing and/or distributing Raffe v. Doe (619 F. Supp. 891 [SDNY-1985]), wherever this decision or citation might appear, unless it is stated that the aforementioned was rendered without any trial, hearing, pre-trial disclosure or opportunity for same, that plaintiff was not a party to same nor were his interests placed in issue, and anything stated therein by U.S. District Judge WILLIAM C. CONNER is not binding on plaintiff, and by reason of the aforementioned, and other reasons, the said determination, as to plaintiff is legally null, void, and of no legal effect; (4) permanently enjoining MEAD DATA CENTRAL, INC. from publishing, republishing and/or distributing any decision or opinion of GERARD L. GOETTEL in Elena R. Sassower v. Field (SDNY-88 Civ. 5775 [GLG]), having reference to plaintiff, directly or indirectly, unless it is expressly and clearly stated that; (a) plaintiff has been denied, without any due process, the right to file papers in that Court as a result of exposing the 'fixing' activities of U.S. District Judge WILLIAM C. CONNER; (b) plaintiff was denied the right to intervene in such proceeding; and (c) by an ex parte oral edict of CHARLES L. BRIEANT, plaintiff has been physically excluded from the Federal Building and Courthouse in White Plains, New York since July of 1989; (5) permanently enjoining MEAD CENTRAL, INC. from publishing, republishing and/or distributing People v. Vilella (147 A.D.2d 666, 538 N.Y.S.2d 66 [2nd Dept.-1989]) or any other material related to said

matter, unless it is stated that the crimes for which DENNIS F. VILELLA was convicted and has been incarcerated for the past five (5) years never occurred, anything stated or implied to the contrary notwithstanding; (6) enjoining MEAD DATA CENTRAL, INC. from publishing, republishing and/or distributing any opinion or decision involving plaintiff, directly or indirectly, unless it is noted that the lawfulness of same is being questioned; (7) permanently enjoining KREINDLER & RELKIN, P.C. and CITIBANK, N.A., from retaining any monies made payable 'to the federal court', but diverted to their pockets, and compelling that they account for same; (8) permanently enjoining FELTMAN, KARESH, MAJOR & FARBMAN, Esqs., KREINDLER & RELKIN, P.C. and CITIBANK, N.A. from retaining any monies and other consideration paid by HYMAN RAFFE to avoid incarceration, as were suffered by plaintiff and SAM POLUR, Esq., and compelling that they account for same: (9) mandating DENIS DILLON return all monies given for plaintiff's bail and mandating the return of all of plaintiff's seized property, including all duplicates and copies; (10) enjoining CHARLES L. BRIEANT from enforcing the physical exclusion edict of plaintiff from the Federal Building and Courthouse in White Plains, New York, to the extent that access is desired by plaintiff to obtain copies of public papers and documents housed in that building; (11) mandating that KREINDLER & RELKIN, P.C., CITIBANK, N.A., and FELTMAN, KARESH, MAJOR & FARBMAN, Esq. to account for all of the judicial trust assets of PUCCINI CLOTHES, LTD. possessed by it on June 4, 1980; (12) declaring the proceedings entitled Elena R. Sassower et ano. V. Field et el. (SDNY-88 Civ. 5775 [GLG]) to be null, void and of no legal effect and/or null, void and of no legal effect as to plaintiff; (13) imposing money damage liability by reason of the aforementioned litigation against the defendants (a) CHARLES L. BRIEANT and JAMES L. OAKES; (b) GERARD L. GOETTEL and LAWRENCE J. GLYNN; (C) KREINDLER & RELKIN, P.C.; FELTMAN, KARESH, MAJOR & FARBMAN, Esqs., and CITIBANK, N.A.; and (d) MEAD DATA CENTRAL, INC.; (14) consolidating and advancing the hearing of this application with a trial on the merits; (14) together with any other further and/or different relief as to this Court may seem just and proper in the premises."

- c. None of the factual modifications or additions in such motion was controverted by anyone.
- d(1) This motion over which U.S. District Court Judge MICHAEL R. MERZ ["Merz"] only had the power to "Report and Recommend", sua sponte, hijacked and waylaid such motion, falsely claiming some technical objections which were not even asserted by the defendants.
- (2) The "hijacking" and "waylaying" of such motion was in conspiratorial consort with some of the defendants and/or their attorneys.

- e(1) I made a second motion on December 17, 1991:
- "(1) declaring the proceedings entitled Elena R. Sassower et ano. v. Field et el. (SDNY-88 Civ. 5775 [GLG]) to be null, void and of no legal effect and/or null, void and of no legal effect as to plaintiff; (2) imposing money damage liability by reason of the aforementioned litigation against the defendants (a) CHARLES L. BRIEANT and JAMES L. OAKES; (b) GERARD L. GOETTEL and LAWRENCE J. GLYNN; (c) KREINDLER & RELKIN, P.C.; FELTMAN, KARESH, MAJOR & FARBMAN, Esqs., and CITIBANK, N.A.; and (d) MEAD DATA CENTRAL, INC. ..."
- (2) This motion was also "hijacked" and "waylaid" by Magistrate Merz, also employing some pretextual deficiencies.
- f(1) I made a third motion on January 3, 1992, correcting all the reasons asserted by Magistrate Merz for "hijacking" and "waylaying" my motions of December 6, 1991 and December 17, 1991.
- (2) This motion was never determined by either Magistrate Merz or Judge Rice.
- 5. When U.S. Attorney Crites failed to transmit by the grand jury, I brought a proceeding, on December 12, 1992, to compel such transmittal.
- Based on "hard evidence" of the corruption of Magistrate Merz, on January 6, 1992 I commenced Action #3, including as a defendant Magistrate Merz for acts clearly and knowingly beyond his jurisdiction.
- b. On January 4, 1992, two days before the execution of my complaint in Action #3, I stated in a judicially filed paper, that affirmant was aware of the corruption of Judge Rice, in addition to Magistrate Merz.
- c. In the absence of "hard evidence" of the corruption of Judge Rice, as distinguished from Magistrate Merz, affirmant did not include Judge Rice as a party defendant in Action #3, although upon the surfacing of such "hard evidence", I amended my complaint and added, inter alia, Judge Rice as a party defendant.
- 7a. With the clear evidence of the corruption of Magistrate Merz, I filed a complaint with the Dayton Bar Association on March 16, 1992.
- b. The Dayton Bar Association not having acknowledged my complaint and other correspondence related thereto, on April 14, 1992, I commenced Action #4.
- acknowledgment from that organization.

 To date, despite many filings with the Dayton Bar association, I have not received a single letter or acknowledgment from that organization.
- 8a. Although judicial corruption in New York Second Circuit extends up to and includes the CIRCUIT COURT OF APPEALS ["CCA2"], including its Chief Judge and former Chief Judge, this complaint will limit itself to the corrupt activities of Presiding Justice of the Appellate Division, First Department, FRANCIS T. MURPHY ["Murphy"] and Chief U.S. District Court Judge CHARLES L. BRIEANT ["Brieant"] of the Southern District of New York.

- b. In New York, disciplinary proceedings are controlled by the Appellate Division, the intermediate appellate court.
- 9. Judicial corruption in the Sixth Circuit has now included the activities and actions of Chief U.S. Circuit Court Judge GILBERT S. MERRITT ["Merritt"], however for the purposes of this complaint it will be essentially limited to Judge Rice and Magistrate Merz.
- 10a. HYMAN RAFFE ["Raffe-The Hostage"], a born American citizen, pays extortion monies to "the criminals with law degrees", which in 1989 had reached more than \$2,500,000, including for activities in Ohio, in order to avoid incarceration.
- b. As independently investigated, reported and published by Mr. Jonathan Ferziger of United Press, International:
 - "By signing three extraordinary agreements ... Raffe agreed In exchange, the court agreed to let him go free. The tab so far has come to more than \$2.5 million, paid to [the Brieant-Murphy cronies]. Raffe continues to pay with checks from his ... business." [emphasis supplied].
- c. Openly asserted, and contained in the aforementioned written, "Raffe-The Hostage" will have to pay extortion monies, until I learn to remain silent on the subject of judicial corruption (cf. CPR, DR 1-103).
- Unknown to me until sometime afterward, SAM POLUR ["Polur-The Hostage"], a born American citizen, was suspended for three (3) years (Matter of Polur, 173 A.D.2d 82, 579 N.Y.S.2d 3 [1st Dept.-1992]) for an act, which no one present at the event denies, was not committed by Polur, but by me.
- b. This would not have occurred if my motion of December 6, 1991 had not been hijacked, for part of the relief requested was:
 - "permanently enjoining MEAD DATA CENTRAL, INC. from publishing, republishing and/or distributing ... Raffe v. Riccobono (113 A.D.2d 1038, 493 N.Y.S.2d 70 [1st Dept.-1985]) ... wherever these decisions or citations might appear, unless it is stated that the aforementioned non-summary criminal contempt convictions were rendered without a trial, without the opportunity for a trial, without any live testimony in support thereof, and stating that by reason of the aforementioned, and for other reasons, the aforementioned determinations are legally null, void, and of no legal effect."
- c. Polur was incarcerated under such trialess circumstances, but years thereafter when he began to expose the state of judicial affairs in New York, this manifestly unconstitutional conviction was elevated from an "offense" to a "serious" crime, and now seven (7) years later, he has been suspended from the practice of law.
- d. Polur's perceived crime is that he is thought to have been associated with me.
- 12a. DENNIS F. VILELLA ["Vilella-The Hostage"] has been incarcerated for more than five (5) years for crimes never committed by anyone.

- b. The full, complete, and uncorroborated testimony of the victim reveals that Vilella struck her "violently", "repeatedly", about 20 times, on "the head", "with a tire iron" (Exhibit "1").
- c. However, <u>concealed</u> from the grand jury and the trial jury were the negative hospital X-Ray and CAT Scan Reports which were made shortly after the alleged incident, which confirms that her testimony, including her "six skull fractures" were contrived, concocted and fabricated (Exhibit "1").
- d. "Vilella-The Hostage" will be released before the expiration of his long term, when I agree to remain silent on the subject of judicial corruption, or had my factually unopposed and/or unopposed motions of December 6, 1991 or January 3, 1992, been determined:

"permanently enjoining MEAD CENTRAL, INC. from publishing, republishing and/or distributing People v. Vilella (147 A.D.2d 666, 538 N.Y.S.2d 66 [2nd Dept.-1989]) or any other material related to said matter, unless it is stated that the crimes for which DENNIS F. VILELLA was convicted and has been incarcerated for the past five (5) years never occurred, anything stated or implied to the contrary notwithstanding".

13. All of the aforementioned will be further amplified in the individual disciplinary complaints.

Dated: September 7, 1992

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