

**COMPLAINT FORM**

September 16, 2017

TO: Attorney Grievance Committee  
Third Judicial Department  
286 Washington Avenue Extension, Suite 200  
Albany, New York 12203

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Complainant's Name: Elena Ruth Sassower,  
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New York State Assistant Attorney General/Litigation Bureau Chief  
Jeffrey Dvorin (registration #1844562/Albany/1983)  
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1. Have you filed a complaint concerning this matter with another attorney grievance committee, state attorney general's office or any other agency?

YES. I complained and gave repeated notice to Attorney General Eric Schneiderman and, simultaneously, to his highest supervisory and managerial attorneys – Chief Deputy Attorney General Jason Brown, Chief Deputy Attorney General Janet Sabel, and Executive Deputy Attorney General for State Counsel Kent Stauffer – of the necessity of their supervisory oversight of Deputy Attorney General Meg Levine and Assistant Attorney General/Litigation Bureau Chief Jeffrey Dvorin for covering up and perpetuating litigation fraud by Assistant Attorney General Adrienne Kerwin, thereafter replicated by Assistant Attorney General Helena Lynch, each appearing “of counsel” to Attorney General Schneiderman in the citizen-taxpayer action, *Center for Judicial Accountability, Inc. v. Cuomo, ...Schneiderman, et al.* (Albany Co. #5122-16), in which he is a named defendant representing himself and his co-defendants.

Action Taken: There was no response from Attorney General Schneiderman and his highest supervisory and managerial attorneys Brown, Sabel, and Stauffer, to whom I furnished, repeatedly, the substantiating particulars and evidentiary proof.

As all four are registered in New York City, I have filed this identical complaint against them with the First Judicial Department Attorney Grievance Committee. A copy of the transmitting letter is annexed.

Previously, on June 21, 2016, I filed a second supplemental corruption complaint with Albany County District Attorney P. David Soares, alerting him to CJA's prior citizen-taxpayer action, *Center for Judicial Accountability, Inc. v. Cuomo, ...Schneiderman, et al.* (Albany Co. #1788-2014), and stating that from the record, posted on CJA's website, he could:

“...verify that the defendants, represented by defendant Attorney General Schneiderman, have corrupted the judicial process because they have no legitimate defense, that they have been aided and abetted by Albany Supreme Court, and that the posture of the case since its inception on March 28, 2014, is one of summary judgment for plaintiffs...” (at p. 4, underlining in original).

District Attorney Soares' nonfeasance with respect to this June 21, 2016 second supplemental complaint and with respect to the July 19, 2013 complaint and January 7, 2014 supplement that preceded it – born of his multitudinous conflicts of interest, first and foremost his own compensation interest resting on judicial compensation – was the subject of CJA's October 14, 2016 conflict-of-interest/misconduct complaint against him and his fellow current and former district attorneys, which I filed with the

eight attorney grievance committees of the four judicial departments.

Entitled “Testing the efficacy of New York’s attorney disciplinary committees in policing district attorney conflicts of interest and obligations to report attorney misconduct”, it was belatedly dismissed by a sham letter of this Committee’s Chief Attorney Monica Duffy, without presentment to the Committee. My request for reconsideration is still pending. The First Department’s Attorney Grievance Committee, as likewise the Fourth and Second Department’s Attorney Disciplinary Committees, comparably dismissed CJA’s October 14, 2016 complaint by sham letters of their chief attorneys, without presentment to the committees’ members, and to which the committee chairs adhered upon my requests for reconsideration.

CJA’s webpage for this conflict-of-interest/misconduct complaint against Attorney General Schneiderman, *et al.*, <http://www.judgewatch.org/web-pages/searching-nys/budget/citizen-taxpayer-action/complaints-notice/9-16-17-attorney-disciplinary-complaint.htm>, posts a link to CJA’s webpage for the October 14, 2016 conflict-of-interest/misconduct complaint against Albany County District Attorney Soares and fellow current and former district attorneys.

2. Have you brought a civil action against this attorney?

YES. Attorney General Schneiderman is a defendant in the citizen-taxpayer action *Center for Judicial Accountability, Inc. v. Cuomo, ...Schneiderman, et al.* (Albany Co. #5122-16) – which, by his “of counsel” Assistant Attorneys General Kerwin and Lynch, he has defended by litigation fraud, corrupting the judicial process.

Name of Court: Supreme Court/Albany County

Result: Acting Supreme Court Justice/Court of Claims Judge Denise Hartman has concealed, without adjudication, the litigation fraud committed by AAGs Kerwin and Lynch and the violations of supervisory responsibilities by defendant Attorney General Schneiderman and his supervisory/managerial attorneys. Likewise, she has concealed and not adjudicated the further and related threshold integrity issues relating to Attorney General Schneiderman, *to wit*, his conflicts of interest, as a defendant, disqualifying him from representing his fellow defendants; and, additionally, his duty to be representing plaintiffs and/or intervening on their behalf pursuant to State Finance Law, Article 7-A and Executive Law §63.1.

Judge Hartman’s “protectionism” of defendant Attorney General Schneiderman, arising from the 30 years she worked in the Attorney General’s office – including for Attorney General Schneiderman and, before that, for then Attorney General, now Governor, defendant Andrew Cuomo, who appointed her to the bench in 2015 – and her HUGE financial interest in the lawsuit by reason of its challenge to the judicial salary increases of which she is a beneficiary – is the subject of a June 12, 2017

conflict-of-interest/misconduct complaint against Judge Hartman which I have filed with the New York State Commission on Judicial Conduct – and of a September 11, 2017 supplement thereto.

(1) Are you represented by an attorney?

Than answer is NO – and the reason is that Judge Hartman has willfully and deliberately not adjudicated plaintiffs’ threshold entitlement to the Attorney General’s representation/intervention pursuant to State Finance Law, Article 7-A and Executive Law §63.1 – reflective of her knowledge that such would require a determination in plaintiffs’ favor.

(2) Are you an attorney?

The answer is NO.

  
