

Center for Judicial Accountability, Inc. (CJA)

From: Brodie, Frederick <Frederick.Brodie@ag.ny.gov>
Sent: Wednesday, July 3, 2019 11:18 AM
To: Center for Judicial Accountability, Inc. (CJA)
Cc: Paladino, Victor
Subject: RE: NOTICE: Your Fraudulent Opposition to Appellants' May 31, 2019 & June 6, 2019 Motions -- CJA v. Cuomo Citizen-Taxpayer Action -- Attention Required by Attorney General James, Personally

Dear Ms. Sassower,

In response to your email below, I disagree with the assertion that defendants' opposition memorandum is "fraudulent." The arguments in the memorandum are based on case law and facts from the record, and the memorandum contains appropriate citations to both.

If you disagree with the content of defendants' memorandum, you are free to submit reply papers. Defendants will not withdraw their filing, and will oppose any motion to strike it.

Very truly yours,

Frederick A. Brodie
Assistant Solicitor General
New York State Office of the Attorney General
Appeals & Opinions Bureau
The Capitol
Albany, NY 12224-0341
(518) 776-2317
Frederick.Brodie@ag.ny.gov

From: Center for Judicial Accountability, Inc. (CJA) <elena@judgewidth.org>
Sent: Wednesday, July 3, 2019 9:47 AM
To: Underwood, Barbara <Barbara.Underwood@ag.ny.gov>; Paladino, Victor <Victor.Paladino@ag.ny.gov>; Brodie, Frederick <Frederick.Brodie@ag.ny.gov>
Subject: NOTICE: Your Fraudulent Opposition to Appellants' May 31, 2019 & June 6, 2019 Motions -- CJA v. Cuomo Citizen-Taxpayer Action -- Attention Required by Attorney General James, Personally

TO: Solicitor General Barbara Underwood
Assistant Solicitor General Victor Paladino
Assistant Solicitor General Frederick Brodie

This is to give you NOTICE of what I have already apprised the Court of Appeals, *via* its Motion Clerk, Rachel MacVean, Esq., namely, that Attorney General James' June 27, 2019 "Memorandum in Opposition to Motions for (i) Leave to Appeal; and (ii) Reargument/Renewal and Other Relief – bearing your names and signed by Assistant Solicitor General Brodie – is, from beginning to end, and in virtually every line, a "fraud on the court" – and unless it is withdrawn, I will make a motion to strike it on that ground and seek maximum sanctions, costs, and damages against each of you, pursuant to 22 NYCRR §130-1.1 and Judiciary Law §487, as well as disciplinary and criminal referrals, pursuant to §100.3D(2) of the Chief Administrator's Rules, for willful violation of New York's Rules of Professional Conduct for Attorneys (22 NYCRR Part 1200) and, specifically, Rule 3.1 "Non-Meritorious Claims and Contentions"; Rule 3.3 "Conduct Before A Tribunal"; Rule 8.4 "Misconduct"; Rule 5.1 "Responsibilities of Law Firms, Partners, Managers and Supervisory