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Elena Ruth Sassower, Director

February 11, 2021

TO: Second Judicial Department Grievance Committee (NYC)  
First Judicial Department Grievance Committee  
Third Judicial Department Grievance Committee

RE: Conflict of interest/misconduct complaint against New York State Attorney General Letitia James, Solicitor General Barbara Underwood, and attorneys under their supervision for litigation fraud in the citizen-taxpayer action *Center for Judicial Accountability, Inc. v. Cuomo...Schneiderman...DiFiore* – and in lawsuits challenging the Committee on Legislative and Executive Compensation, whose December 10, 2018 report, raising Attorney General James’ pay, she was duty-bound to void and prosecute as a “false instrument”, etc.

## THE COMPLAINT

New York’s attorney grievance committees are charged with protecting the public from attorneys who violate New York’s Rules of Professional Conduct (22 NYCRR Part 1200). No attorney’s violation of those Rules is of greater consequence to the People of the State of New York—and to the integrity of state governance – than violations by their highest legal officer, the New York State Attorney General.

Herewith filed is a fully-documented conflict-of-interest/misconduct complaint against New York State Attorney General Letitia James, sworn into office on January 1, 2019, and against attorneys under her supervision who have acted in her name – in particular, Solicitor General Barbara Underwood, Assistant Solicitor General Victor Paladino, Assistant Solicitor General Frederick Brodie, Assistant Attorney General Helena Lynch, and Assistant Attorney General Christopher Liberati-Conant<sup>1</sup> – for their knowing and deliberate violations of New York’s Rules of Professional Conduct, *inter alia*:

- Rule 1.7: “Conflict of Interests: Current Clients”;
- Rule 3.1: “Non-Meritorious Claims and Contentions”;
- Rule 3.3: “Conduct Before a Tribunal”;

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<sup>1</sup> Attorney General James is registered in the Second Judicial Department (NYC): #2251072 (1989). Solicitor General Underwood is registered in the First Judicial Department: #1040518 (1979). The others are registered in the Third Judicial Department: Assistant Solicitor General Paladino: #2180735 (1988); Assistant Solicitor General Brodie #2255321 (1989); Assistant Attorney General Lynch: #4383642 (2006); and Assistant Attorney General Liberati-Conant #4786976 (2010).

- Rule 8.4: “Misconduct”;  
Rule 5.1: “Responsibilities of Law Firms, Partners, Managers and Supervisory Lawyers”;  
Rule 5.2: “Responsibilities of a Subordinate Lawyer”;  
Rule 8.3: “Reporting Professional Misconduct”.

At issue is Attorney General James’ “wilful misconduct in office”<sup>2</sup> to maintain fraudulent, unconstitutional pay raises for herself and public officers with whom she has political, professional, and personal relationships – and who she is duty-bound to prosecute for public corruption. This misconduct, violating penal laws in addition to the aforesaid Rules of Professional Conduct, includes:

(1) her litigation fraud, born of conflicts of interest, at the New York Court of Appeals in the citizen-taxpayer action *Center for Judicial Accountability, Inc. v. Cuomo...Schneiderman...DiFiore* (Albany Co. #5122-16), spanning from March 2019 to February 2020, because she had NO legitimate defense to Court of Appeals review of an unconstitutional and fraudulent December 27, 2018 Appellate Division, Third Department memorandum and order “affirming” an unconstitutional and fraudulent November 28, 2017 decision and judgment of Acting Supreme Court Justice/Court of Claims Judge Denise Hartman upholding the constitutionality and lawfulness of the state budget and the “force of law” commission scheme that would enable her, Comptroller DiNapoli, the 213 Senate and Assembly members of the New York State Legislature, executive agency commissioners, and, indirectly, Governor Cuomo and Lieutenant Governor Hochul, to obtain pay raises for themselves – and which had already produced pay raises for judges and district attorneys via two statutorily-violative, fraudulent, and unconstitutional commission reports: an August 29, 2011 report of the Commission on Judicial Compensation and a December 24, 2015 report of the Commission on Legislative, Judicial and Executive Compensation – both “false instruments”, violative of a succession of penal laws;<sup>3</sup>

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<sup>2</sup> New York State Constitution, Article I, §6.

<sup>3</sup> The Appellate Division, Third Department’s December 27, 2018 memorandum and order is reported as: *aff’d*, 167 A.D.3d 1406 (3<sup>rd</sup> Dep’t 2018). Its unconstitutionality and fraudulence were comprehensively demonstrated by plaintiff-appellants’ 34-page, virtually line-by-line “legal autopsy”/analysis of it, enclosed with their March 26, 2019 letter to the Court of Appeals in support of their appeal of right. Its accuracy has NEVER been contested by anyone.

Judge Hartman’s November 28, 2017 decision and judgment is unreported and is cited as: Sup. Ct. Albany Cty., Index No. 5122-16, Hartman, J., Dec. 8, 2017. Its unconstitutionality and fraudulence were comprehensively demonstrated by plaintiff-appellants’ 22-page, virtually line-by-line, “legal autopsy”/analysis of it, annexed as part of their January 10, 2018 notice of appeal to the Appellate Division, Third Department, printed in the record on appeal at R9-R30 and encompassed at pp. 46-69 of the appeal brief. Its accuracy has NEVER been contested by anyone.

(2) her self-dealing and larceny, spanning from the January 1, 2019 date she took office, when she became the beneficiary of a comparably statutorily-violative, fraudulent, unconstitutional “false instrument” December 10, 2018 report of the Committee on Legislative and Executive Compensation raising her attorney general salary, the salaries of Comptroller DiNapoli, legislators, executive agency commissioners, and, thereafter, of Governor Cuomo and Lieutenant Governor Hochul – ignoring, since July 15, 2019, CJA’s formal NOTICE of her duty to void it, to return the salary raise she had already received, and to prosecute for penal law violations the Committee on Legislative and Executive Compensation’s four members – Comptroller DiNapoli, among them – and their *pro bono* counsel;

(3) her litigation fraud, born of conflicts of interest, from January 2019 to the present, to defeat lawsuits challenging the Committee on Legislative and Executive Compensation’s December 10, 2018 report and the constitutionality of the “force of law” commission scheme that produced it – including by urging dismissals based on the Appellate Division, Third Department’s December 27, 2018 memorandum and order in *CJA v. Cuomo...Schneiderman... DiFiore* and the Court of Appeals’ dismissals/denials of plaintiff-appellants’ appeals thereof, as in *Delgado v. State of New York* (Albany Co. #907537-18) and *Barclay v. New York State Committee on Legislative and Executive Compensation* (Albany Co. #901837-19);<sup>4</sup>

(4) her litigation fraud, born of conflicts of interest, from August 2019 onward, in opposing lawsuits challenging other incarnations of the “force of law” commission scheme – as, for instance, the Public Campaign Financing and Election Commission, challenged by *Jastrzemski v. Public Campaign Financing and Election Commission* (Niagara County, #E169561/2019) and *Hurley v. Public Campaign Financing and Election Commission* (Niagara County #E169547/2019).<sup>5</sup>

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<sup>4</sup> These two cases and the Attorney General’s litigation fraud therein were discussed by plaintiff-appellants in *CJA v. Cuomo...Schneiderman...DiFiore*, in their submissions to the Court of Appeals: (1) their March 26, 2019 letter in support of their appeal of right (at pp. 15-18); (2) their April 11, 2019 letter in further support of their appeal of right (at pp. 13-15); (3) their May 31, 2019 reargument/renewal/vacatur/disclosure/disqualification motion (aff/¶¶27-28); (4) their June 6, 2019 motion for leave to appeal (at pp. 19-20); (5) their August 8, 2019 motion to strike the Attorney General’s opposition & other relief (Ex. B, at p. 17, pp. 18-19); (6) their August 9, 2018 letter (at pp. 2-4); (7) their August 28, 2019 letter (at pp. 18-19); (8) their November 25, 2019 reargument/renewal/vacatur/disclosure/disqualification motion (aff/pp. 13-19); (9) their January 9, 2020 letter (at pp. 3-10). Indeed, at the Appellate Division, Third Department, plaintiff-appellants discussed the then just-commenced *Delgado* case in their final December 15, 2018 submission (at ¶¶9-11), annexing a copy of the complaint therein, as to which there was not yet even an RJI.

<sup>5</sup> These two cases were also discussed by plaintiff-appellants in *CJA v. Cuomo...Schneiderman... DiFiore*, in their August 9, 2019 letter to the Court of Appeals (at pp. 2-4) and, additionally, in their August 28, 2019 letter (at pp. 18-19).

Additionally, insofar as Rule 8.3(a) “Reporting Professional Misconduct” reads:

“A lawyer who knows that another lawyer has committed a violation of the Rules of Professional Conduct that raises a substantial question as to that lawyer’s honesty, trustworthiness or fitness as a lawyer shall report such knowledge to a tribunal or other authority empowered to investigate or act upon such violation”,

this complaint against Attorney General James also encompasses her Rule 8.3(a) violations PRIOR to her assuming office on January 1, 2019, when, on July 16, 2018, as a Democratic primary candidate for attorney general, I gave her, *in hand*, a copy of CJA’s May 16, 2018 NOTICE/complaint to then Interim Attorney General Underwood (Exhibit A-1) about the *modus operandi* of litigation fraud utilized by the Attorney General’s office to perpetuate the corruption of state governance and also handed her, in substantiation, a copy of the July 4, 2018 appeal brief and three-volume record on appeal to the Appellate Division, Third Department in *CJA v. Cuomo...Schneiderman...DiFiore* so that she could immediately verify the truth of the May 16, 2018 NOTICE/complaint, *to wit*, that there was NO legitimate defense to Judge Hartman’s November 28, 2017 decision, which Attorney General Schneiderman had procured by litigation fraud born of conflicts of interest, shared by Judge Hartman. On August 15, 2018, I again gave her, *in hand*, CJA’s May 16, 2018 NOTICE/complaint and stated that Interim Attorney General Underwood had not responded to it, other than by employing the same *modus operandi* of litigation fraud at the Appellate Division, Third Department to secure affirmance of the November 28, 2017 decision and judgment, as Attorney General Schneiderman had utilized before Judge Hartman to obtain it.

Finally, this complaint is also against Solicitor General Underwood for the litigation fraud she committed as interim attorney general at the Appellate Division, Third Department *in CJA v. Cuomo...Schneiderman...DiFiore*, from July 2018 through December 2018, and *via* Assistant Solicitors General Paladino and Brodie, and originating two months earlier when she ignored, without response, my May 16, 2018 NOTICE/complaint that there was NO legitimate defense to the appeal (Exhibit A-1, A-2), and my follow-up May 30, 2018 letter about her conflicts of interest (Exhibit B).

### **BACKGROUND**

The attorney grievance committees are already familiar with the *CJA v. Cuomo...Schneiderman...DiFiore* citizen-taxpayer action and the material facts underlying it pertaining to the state budget, the statutes creating the “force of law” Commission on Judicial Compensation and Commission on Legislative, Judicial and Executive Compensation and their two statutorily-violative, fraudulent, unconstitutional “false instrument” reports raising judicial salaries – and, consequentially, district attorney salaries. Such were the subject of two prior fully-documented complaints:

- CJA’s October 14, 2016 conflict-of-interest/misconduct complaint against Albany District Attorney P. David Soares and New York’s 61 other district attorneys, filed with ALL eight attorney grievance committees within New York’s four judicial departments and which additionally sought their referral to criminal authorities for their larcenous pocketing of district attorney salary increases they knew to be unlawful and for their other wilful and deliberate violations of penal laws they are charged with enforcing relating thereto – and which, as to D.A. Soares, was supplemented by a March 6, 2018 complaint to the Third Department Attorney Grievance Committee – both the complaint and supplement involving *CJA v. Cuomo...Schneiderman...DiFiore*;<sup>6</sup>
- CJA’s September 16, 2017 conflict-of-interest/misconduct complaint against Attorney General Schneiderman, five of his supervisory/managerial lawyers, and two subordinate assistant attorneys general, including Helena Lynch, filed with the First and Third Department Attorney Grievance Committees and thereafter supplemented by a December 26, 2017 update pertaining to the litigation fraud before Judge Hartman in *CJA v. Cuomo...Schneiderman...DiFiore*.<sup>7</sup>

The eight attorney grievance committees disposed of the October 16, 2016 complaint by largely identical letters signed by the chief attorneys, baldly purporting that it did “not provide a sufficient basis to conduct an investigation” – and that whether the district attorney salary increases are unlawful “must be addressed and resolved in another more appropriate forum” and is “the subject of a pending legal proceeding”. The false and disingenuous nature of these dismissal letters was particularized by my written requests for reconsideration, but their rebutting presentations were not addressed in the subsequent letters from mostly these same chief attorneys, adhering to the dismissals of the complaint.

As for the disposition of the September 16, 2017 complaint, First Department Attorney Grievance Committee Chief Attorney Dopico purported, without specificity, by a December 11, 2017 letter, that “there is insufficient basis to establish that [the complained-against attorneys] violated the New York Rules of Professional Conduct” and – also without specificity – and directly contradicting the complaint – that my “allegations had been previously addressed before the Court”. On January 9,

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<sup>6</sup> The March 6, 2018 complaint is part of the record in *CJA v. Cuomo...Schneiderman...DiFiore*, furnished by plaintiff-appellants to the Appellate Division, Third Department as free-standing Exhibit I (eye) to their July 25, 2018 order to show cause – and was referenced at the Court of Appeals by their May 31, 2019 reargument/renewal/vacatur/disclosure/disqualification motion (my moving affidavit, fn. 26).

<sup>7</sup> The September 16, 2017 complaint is also part of the record in *CJA v. Cuomo...Schneiderman...DiFiore*, also furnished by plaintiff-appellants to the Appellate Division, Third Department as free-standing Exhibit I (eye) to their July 25, 2018 order to show cause – and was also referenced at the Court of Appeals by their May 31, 2019 reargument/renewal/vacatur/disclosure/disqualification motion (my moving affidavit, fn. 24 and 26).

2018, I sought reconsideration, particularizing the falsity of these two conclusory assertions, evident from the very face of the September 16, 2017 complaint. Nevertheless, Chief Attorney Dopico advised, by May 30, 2018 letters, that an “independent board of lawyers and non-lawyers appointed by the Appellate Division, First Department” was “in agreement with the original decision” – without specificity as to how such “agreement” was possible.

Third Department Attorney Grievance Committee Chief Attorney Duffy disposed of the September 16, 2017 complaint, together with its March 6, 2018 supplement, by purporting, without specificity, by a July 20, 2018 letter, that “it has been determined that the issues you raise are more appropriate for resolution by a court of law or through other available legal remedies in the first instance.”

As the grievance committees’ dispositions of the October 14, 2016 and September 16, 2017 complaints involving *CJA v. Cuomo...Schneiderman...DiFiore* have led directly to this complaint, arising from the subsequent progression of *CJA v. Cuomo...Schneiderman...DiFiore*, I incorporate by reference the records of those two prior complaints.

### **THE EVIDENCE**

The EVIDENCE substantiating this complaint is open-and-shut and *prima facie*, establishing that the complained-against attorneys must not only be disbarred for their wilful and flagrant violations of New York’s Rules of Professional Conduct, but referred to criminal authorities for prosecution of penal law violations including:

Penal Law §175.35: “Offering a false instrument for filing in the first degree”;  
Penal Law §195.20: “Defrauding the government”;  
Penal §190.65: “Scheme to defraud in the first degree”;  
Penal Law §496.05 (“Public Trust Act): “Corrupting the government in the first degree”;  
Penal Law §496.06 (“Public Trust Act): “Public corruption”;  
Penal Law §155.42: “Grand larceny in the first degree”;  
Penal Law §460.20: “Enterprise corruption”;  
Penal Law §110.00: “Attempt to commit a crime”;  
Penal Law §195: “Official misconduct”;  
Penal Law §105.15: “Conspiracy in the second degree”;  
Penal Law §20.00: “Criminal liability for conduct of another”.

THE EVIDENCE consists of:

- (1) the record of *CJA v. Cuomo...Schneiderman...DiFiore* before the New York Court of Appeals and Appellate Division, Third Department;
- (2) CJA’s July 15, 2019 NOTICE (Exhibit C-1) and its accompanying 46-page, single-spaced analysis of the December 10, 2018 report of the Committee on Legislative and Executive Compensation, e-mailed to both Attorney General James

and Solicitor General Underwood on that date (Exhibit C-2), with a hard-copy additionally sent, with exhibits, by certified mail, to Attorney General James, materially resting on my November 30, 2018 testimony before the Committee on Legislative and Executive Compensation – and the substantiating appeal brief and three-volume record on appeal in *CJA v. Cuomo...Schneiderman...DiFiore* that I had handed up in testifying – identical to what I had given, *in hand*, 4-1/2 months earlier, to then A.G. Candidate James; and

(3) the record of Attorney General James’s advocacy, *via* her subordinate attorneys, in the lawsuits that were the consequence of the fraudulent judicial decisions that she and her predecessor Attorneys General Underwood and Schneiderman procured in *CJA v. Cuomo...Schneiderman...DiFiore* – starting with *Delgado*, where the lower court’s June 7, 2019 decision, on appeal at the Appellate Division, Third Department, rests on the Appellate Division, Third Department’s December 27, 2018 memorandum and order in *CJA v. Cuomo...Schneiderman...DiFiore*, which she argues is decisive.<sup>8</sup>

Suffice to say that the record in *CJA v. Cuomo...Schneiderman...DiFiore* is EASY to examine with respect to the Attorney General’s litigation fraud – as plaintiff-appellants responded to EACH instance – which was every time the Attorney General’s subordinates made a submission or court appearance – with a responsive filing, furnishing a line-by-line “legal autopsy”<sup>9</sup>/analysis of their

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<sup>8</sup> See Attorney General James’ September 14, 2020 respondents brief, bearing, in addition to her name, that of Solicitor General Underwood, and signed by Assistant Solicitor General Paladino, stating:

“As shown below, plaintiffs’ unlawful delegation claim is foreclosed by this Court’s decision in *Ctr. for Judicial Accountability, Inc. v. Cuomo*, which upheld as a lawful delegation of legislative authority a nearly identical statute insofar as it empowered a commission to recommend salary increases for judges. 167 A.D.3d 1406, 1410-11 (3d Dep’t 2018), appeal dismissed, 33 N.Y.3d 993, reconsid. & lv. denied, 34 N.Y.3d 960-61 (2019), rearg. denied, 34 N.Y.3d 1147 (2020)” (at p. 3).

The referred-to showing “below” ends, as follows:

“Nothing less than a complete reevaluation of the delegation doctrine would be required for plaintiffs to prevail. But the Court of Appeals has given no indication that it is interested in upsetting decades of precedent. Just the opposite is true. The plaintiffs in *Ctr. for Judicial Accountability* attempted to appeal as of right to the Court of Appeals from this Court’s decision, arguing that it wrongly decided the delegation-of-authority claim. Although this Court had squarely addressed that claim, the Court of Appeals summarily dismissed the appeal because ‘no substantial constitutional question [was] directly involved.’ *Ctr. for Judicial Accountability, Inc. v. Cuomo*, 33 N.Y.3d 993, 993-94 (2019). Plaintiffs’ unlawful delegation claim here is likewise insubstantial.” (at p. 25).

<sup>9</sup> The term “legal autopsy” is taken from the law review article “*Legal Autopsies: Assessing the Performance of Judges and Lawyers Through the Window of Leading Contract Cases*”, 73 Albany Law

violations of New York's Rules of Professional Conduct in support of requested relief. The accuracy of these "legal autopsy"/analyses was not denied or disputed by the Attorney General in any respect. Likewise, the accuracy of the conflicts of interest that plaintiff-appellants set forth as propelling the litigation fraud.<sup>10</sup>

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Review 1 (2009), by Gerald Caplan, recognizing that "Performance assessment cannot occur without close examination of the trial record, briefs, oral argument and the like..." (p. 53).

<sup>10</sup> The uncontested conflicts, as to Attorney General James, itemized at ¶55 of my moving affidavit in support of plaintiff-appellants' May 31, 2019 reargument/renewal/vacatur/disqualification motion to the Court of Appeals, were as follows:

"(A) she...has a HUGE salary interest in appellants' sixth cause of action for declarations that Part E, Chapter 60 of the Laws of 2015 is unconstitutional, *as written* and by its enactment [R.109-112 (R.187-201)]. The Commission on Legislative, Judicial and Executive Compensation it creates is scheduled to be re-established on June 1, 2019 – and her own salary increases are within the purview of its seven members, two of whom will be defendant DiFiore's appointees [R.1080-1082].

And, already, Attorney General James is benefiting from the materially identical Part HHH, Chapter 59 of the Laws of 2018 that established the Legislative and Executive Compensation Committee, which, like Part E, Chapter 60 of the Laws of 2015, was an unconstitutional rider, inserted into the budget as a result of behind-closed-doors, three-men-in-a-room budget deal-making. By its December 10, 2019 Report – replicating ALL the violations which are the subject of appellants' seventh and eighth causes of action [R.112-114 (R.201-213)] – she benefited from a \$38,5000 salary raise.

On December 31, 2018, the Attorney General's salary, pursuant to Executive Law §60, was \$151,500. As a result of the 'force of law' recommendations of the Committees' December 10, 2018 Report, it zoomed to \$190,000, effective January 1, 2019. On January 1, 2020, this will shoot up another \$20,000 to \$210,000, and then, on January 1, 2021, by another \$10,000 to \$220,000.

(B) she has a HUGE interest in preventing adjudication of the threshold issue of the litigation fraud perpetrated by her March 26, 2019 letter [urging the Court's dismissal of plaintiff-appellants' appeal of right] because, in addition to her liability for financial sanctions and costs, pursuant to §130.1.1 of the Chief Administrator's Rules and Judiciary Law §487, such corrupting of the judicial process triggers the Court's mandatory disciplinary responsibilities, pursuant to §100.3D(2) of the Chief Administrator's Rules Governing Judicial Conduct, to refer her and her conspiring attorney staff to disciplinary and criminal authorities – the consequence of which, based on this record, will be disbarment, indictments, and convictions;

(C) she has HUGE interests in preventing adjudication of the threshold issue of the Attorney General's constitutional function and the statutory provisions



For your convenience, inventories of these responsive submissions at the Court of Appeals and the Appellate Division, Third Department with their “legal autopsy”/analyses of the Attorney General’s litigation fraud are annexed hereto (Exhibits D and E).

And, as the record shows, the response of the Court of Appeals and the Appellate Division to these responsive submissions, establishing the Attorney General’s litigation fraud and conflict of interest was to either conceal it entirely – which had been Judge Hartman’s response – or to make no findings of fact and conclusions of law with respect thereto – because their own financial and other

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embodying it, such as Executive Law §63.1 and State Finance Law Article 7-A, as she has subverted them, totally – and such is a *modus operandi* of how the Attorney General operates, established by the record herein;

(D) she has HUGE interests in perpetuating the corruption of constitutional, checks-and-balance duties by her fellow respondent-defendants – chronicled by the pleadings in this citizen-taxpayer action and the record herein – as a constitutionally-functioning Governor, Legislature, and Judiciary would ensure oversight of the operations of the Attorney General, beginning with how its occupants have been discharging their constitutional responsibilities.”

The uncontested conflicts with respect to then Interim Attorney General Underwood, which plaintiff-appellants placed before the Appellate Division, Third Department as part of their July 25, 2018 order to show cause, were those set forth by my May 30, 2018 letter to her (Exhibit B), furnished as an exhibit, reciting, *inter alia*:

- Your personal and professional relationships with the supervisory and managerial attorneys [of former Attorney General Schneiderman] whose misconduct is the subject of my September 16, 2017 misconduct complaint to the Attorney Grievance Committees for the First and Third Judicial Departments – who continue to work for you, just as they worked for Attorney General Schneiderman;
- Your personal and professional relationships with Judge Denise Hartman whose misconduct in the second citizen-taxpayer action is the subject of my June 16, 2017 misconduct complaint to the Commission on Judicial Conduct – and who not only worked in the attorney general’s office for 30 years until Governor Cuomo appointed her to the bench and the Senate confirmed her in May 2015, but was an assistant solicitor general, under you;
- Your personal and professional relationships with Governor Andrew Cuomo, who, upon being elected attorney general in November 2006, appointed you to be his solicitor general, which position you assumed in January 2007;
- Your personal and professional relationships with Attorney General Eric Schneiderman, who, upon being elected to that office in November 2010, retained you as his solicitor general and designated you his successor. ...”

interests in the lawsuit required them to trash their judicial duties and “throw” the case, which by their fraudulent decisions they did. Plaintiff-appellants’ fully-documented February 7, 2021 complaint to the Commission on Judicial Conduct against the judges of the Court of Appeals and justices of the Appellate Division, Third Department, based on the *CJA v. Cuomo...Schneiderman...DiFiore* record, is enclosed.

To further assist you, I have created a webpage for this complaint on CJA’s website, [www.judgewatch.org](http://www.judgewatch.org), aggregating ALL the above-cited EVIDENCE. The direct link is: <https://www.judgewatch.org/web-pages/searching-nys/attorney-discipline/feb-11-21-complaint-vs-james-etc.htm>.

Although your rules do not require complainants to swear to the truth of their attorney misconduct complaints, I eagerly do so – using the attestation that Albany County District Attorney P. David Soares includes on the complaint form of his so-called “Public Integrity Unit”:

“I understand that any false statements made in this complaint are punishable as a Class A Misdemeanor under Section 175.30 and/or Section 210.45 of the Penal Law.”

Thank you.

Enclosure: CJA’s February 7, 2021 judicial misconduct complaint,  
filed with the Commission on Judicial Conduct