

**CENTER for JUDICIAL ACCOUNTABILITY, INC.**

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December 12, 2014

TO: Legislative Ethics Commission  
Attorney General Eric Schneiderman  
Albany County District Attorney P. David Soares  
U.S. Attorney for the Northern District of New York Richard Hartunian  
U.S. Attorney for the Southern District of New York Preet Bharara  
U.S. Attorney for the Eastern District of New York Loretta Lynch

FROM: Elena Sassower, Director  
Center for Judicial Accountability, Inc. (CJA)

RE: Conflict of Interest Ethics Complaint vs Governor Andrew Cuomo, Legislative Leaders, & JCOPE for Violation of the Public Integrity Reform Act of 2011 Pertaining to the Review Commission Statutorily-Required to be Appointed "No later than June 1, 2014"

Enclosed is CJA's self-explanatory December 11, 2014 ethics complaint to the Joint Commission on Public Ethics, to which you are indicated recipients, requesting affirmative action as follows:

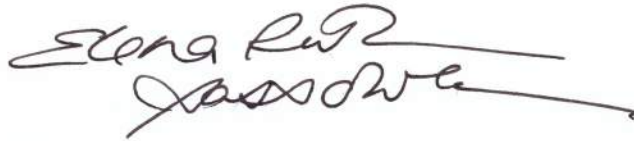
"By copy of this letter to the Legislative Ethics Commission (LEC), we also initiate an ethics complaint with it against the Legislative Leaders for their self-interested violation of their statutory duty to appoint the JCOPE/LEC review commission – and of their correlative duty to have taken appropriate action against the Governor, if the failure to appoint the review commission was attributable solely to him. In so doing, we request that LEC refer this complaint to all relevant authorities, including investigative and prosecutorial officers able to bring an Article 78 proceeding for mandamus to compel the Governor and Legislators to appoint the review commission.<sup>fn.6</sup> The jurisdictionally-proper public officers for this task are: Attorney General Eric Schneiderman, Albany County District Attorney P. David Soares, and U.S. Attorney for the Northern District of New York Richard Hartunian. Then, too, there are New York's purported corruption-fighting U.S. Attorneys for the Southern and Eastern Districts of New York, Preet Bharara and Loretta Lynch.

So that no time is wasted in bringing the necessary mandamus proceeding to uphold the rule of law and the public's rights, a copy of this letter will be directly furnished to these five investigative/prosecutorial officers, with a request that they rise above their own conflicts of interest, born of their own nonfeasance with respect to CJA's complaints to them of the 'grand larceny of the public fisc and other corruption' that

is the subject of our April 15, 2013 corruption complaint to U.S. Attorney Bharara on which our June 27, 2013 ethics complaint to JCOPE rests.<sup>fn.7</sup> (at p. 4, underlining in the original).

Please advise, without delay.

Thank you.

A handwritten signature in black ink, appearing to read "Elena Russo". The signature is written in a cursive style with a long horizontal line extending to the right.

Enclosure

cc: Governor Andrew M. Cuomo  
Temporary Senate President Dean Skelos  
Assembly Speaker Sheldon Silver  
Senate Minority Leader Andrea Stewart-Cousins  
Assembly Minority Leader Brian Kolb  
New York State Inspector General Catherine Leahy Scott  
The New York City Bar Association (ATT: Alan Rothstein, Counsel)  
& its Committee on Government Ethics (ATT: Benton Campbell, Chair)  
Common Cause/NY (ATT: Susan Lerner, Executive Director)  
NY Public Interest Research Group (NYPIRG) (ATT: Blair Horner, Legislative Director)  
Joint Commission on Public Ethics  
(ATT: Daniel J. Horwitz, Chair; Letizia Tagliaferro, Executive Director)  
The Public & The Press