SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF WESTCHESTER

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In the Matter of the Application of GEORGE SASSOWER, individually and on behalf of the Westchester County Grand Jury, Petitioner, -against- District Attorney CARL A. VERGARI; Assistant N.Y.S. Attorney General RONALD GOLDSTOCK; and Attorney General ROBERT ABRAMS, Respondents. For Writs of Mandamus and Prohibitions	Index No. 16682-1992 Assigned to: Hon. Kenneth H. Lange

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STATE OF NEW YORK)
)ss:
COUNTY OF WESTCHESTER)

GEORGE SASSOWER, first being duly sworn, deposes, and says:

1a(1) This affidavit is made with respect to the Notice of Cross-Motion of ROBERT ABRAMS "Respondent Pro Se" which through Assistant N.Y. State Attorney General CAROLYN CAIRNS OLSON ["Olson"], dated October 26, 1992, at state cost and expense, seeks to prevent, inter alia, grand jury inquiry into his personal conduct, which conduct is of a criminal magnitude and contrary to legitimate state interests, monetarily or otherwise.

(2) Thus, the threshold question the Court must address itself in this matter, before it can even consider Ms. Olson's presentation and submission, is whether this Court tolerate a situation wherein Abrams, at state cost and expense, is seeking to defend himself for personal misconduct?

b. There is no affidavit or affirmation attached to Ms. Olson Notice of Cross-Motion, but instead a "Memorandum" in support of her motion, wherein whatever factually material Ms. Olson desires to present in placed in such unsworn document.

2a. Incorporated herein, in haec verba, is a copy of deponent's affidavit of October 27, 1992 (Exhibit "A"), which was executed, served and filed before receipt of Ms. Olson's papers, and even before deponent knew that Ms. Olson was assigned this matter, or dragooned this matter to herself.

b. Also incorporated herein, in haec verba, as a sworn document, is deponent's "Memorandum of Law" of the same date (Exhibit "B").

3a. Subsequent to deponent's submissions of October 27, 1992, further evidence of attempted "fixes" in this Court have surfaced, including by Ms. Olson herself.

b. In Sassower v. Abrams (Sup. West. Index No. 92-17051 [WDD]), submitted her papers not directly to this Court, but through FRED L. SHAPIRO, Esq. ["Shapiro"] with a covering letter that began with "Dear Fred".

c. Such matter, and the evidence surrounding such "Dear Fred" communication will be part of deponent's intended grand jury presentation, however such presentation will be made.

4a. Since deponent's submissions, neither Shapiro, nor anyone else, has disclosed the "ex parte" activities involving deponent in this Court.

b. Consequently, deponent must re-apply and re-affirm his insistence on a general bias recusal, which is a jurisdictional infirmity (Liljeberg v. Health Services, 486 U.S. 847, 865 n.12 [1988]).

5a. The fact that Ms. Olson's submission is by virtue of a "Memorandum", rather than an affidavit, does not immunize her from the provision of, inter alia, Judiciary Law §487, which provides:

> "An attorney or counselor who: 1. Is guilty of any deceit or collusion, or consents to any deceit or collusion with intent to deceive the court or any party; or .... Is guilty of a misdemeanor, and in addition to the punishment prescribed therefor by the penal law, he forfeit to the party injured treble damages, to be recovered in a civil action."

b(1) To repeat, once again, there is nothing in deponent's papers which seeks a prosecution of Abrams or anyone else, as distinguished from a presentation to the grand jury.

(2) Respondents, acting in obvious collusion, unable to find legal argument against deponent's position, incorporated in Article 1 §6 of the New York State Constitution, have instead transmogrified deponent's argument to read that he seeks a prosecution.

(3) Deponent intends to move for, inter alia, §487 civil damages.

c. As respondents, particularly Olson, are aware, the published decisions involving deponent are jurisdictionally infirm and/or coram non judice.

(1) In a very comprehensive report, confirmed by the Appellate Division, following extensive hearings, deponent was clearly and resoundingly vindicated of each and every charge lodged against him by the Signorelli entourage.

(2) As the report reveals, the judicial opinions were the result of fraud, perjury and deception by the Signorelli clan, to the point that when deponent began to make the transcript available to the public, the Grievance Committee sought to enjoin deponent from taking such action.

(3) Although the right of confidentiality belonged to deponent, not to the Signorelli entourage, deponent was requested by the Appellate Division to avoid needless disclosure, and deponent has given respect to such request.

(4) It is also clear from subsequent, non-confidential proceedings, where deponent was again resoundingly vindicated, that Surrogate Signorelli was paying his private monetary obligations from estates in his judicial bailiwick.

(5) Abrams, as well as Olson and other assistant attorney generals, are transactionally involved in the systematic larceny of judicial trust assets, and other racketeering activities, as revealed by, inter alia, deponent's Order with Notice of Settlement dated November 24, 1992, returnable December 14, 1992.

(6) These decisions which Olson cites were only attempts to conceal these criminal rackets, in which Abrams, qua fiduciary, is the essential participant.

Deponent's convictions, with substantial fines and/or terms of incarceration imposed thereon, were all for non-summary criminal contempt, all rendered without a trial, without the opportunity for a trial, without any confrontation rights, and without any live testimony in support thereof, despite Bloom v. Illinois (391 U.S. 194 [1968]); Klapprott v. U.S. (335 U.S. 601 [1949]); Nye v. U.S. (313 U.S. 33 [1941]).

However, such jurisdictional and/or constitutional infirmities are concealed in the reported decisions, which are then made the subject of interstate commerce (cf. 15 U.S.C. 1125), and employed by Olson and the other respondents to deceive this Court.

(7) In some of the cases that Olson cites, she should respond about her participation in the federal courts, at state cost and expense, in view of the Eleventh Amendment jurisdictional bar.

(8) In short, Olson is defrauding the State of New York and knowingly deceiving this Court.

WHEREFORE, it is respectfully prayed that the relief requested by deponent be granted in all respects, with costs.

GEORGE SASSOWER

Sworn to before me this
7th day of December, 1992

CERTIFICATION OF SERVICE

On December 7, 1992, I served a true copy of the Affidavit by mailing same in a sealed envelope, first class, with proper postage thereon, addressed to District Attorney Carl A. Vergari, 111 Grove Street, White Plains, New York, 10601; Ass't Atty. Gen. Ronald Goldstock, 143 Grand Street, White Plains, N.Y. 10601; Ass't Atty. Gen. Carolyn C. Olson, 120 Broadway, New York, N.Y. 10271, that being their last known addresses.

Dated: December 7, 1992

GEORGE SASSOWER