

**From:** Center for Judicial Accountability, Inc. (CJA) <elena@judgewatch.org>  
**Sent:** Tuesday, April 27, 2021 11:53 AM  
**To:** AD1-AGC-newcomplaints@nycourts.gov  
**Cc:** ad2-grv2@nycourts.gov; AD3-AGC-IU@nycourts.gov; [ad3agc@nycourts.gov](mailto:ad3agc@nycourts.gov)  
**Subject:** **STATUS, SUPPLEMENT, & QUERY: CJA's Feb. 11, 2021 Attorney Misconduct Complaint vs NY Solicitor General Barbara Underwood -- & NY Attorney General Letitia James**  
**Attachments:** [analysis-delgado-4-25-21.pdf](#)

**TO: First Department Attorney Grievance Committee**

Other than an April 9<sup>th</sup> automated acknowledgment of receipt, I have received no response to my below April 9<sup>th</sup> e-mail inquiring about CJA's February 11, 2021 conflict-of-interest/misconduct complaint against Solicitor General Barbara Underwood, filed with you – and against Attorney General Letitia James, filed with the Second Department Attorney Grievance for the Second, Eleventh, and Thirteenth Judicial Districts, which its chief counsel stated to be within your jurisdiction as well.

What numbers have you assigned to the complaint against Solicitor General Underwood? And how about the complaint against Attorney General James?

As a supplement to the February 11, 2021 complaint against both of them pertaining to their litigation fraud in *Delgado v. NYS*, above-attached is a “legal autopsy”/analysis of the Appellate Division, Third Department’s March 18, 2021 “Opinion and Order” in *Delgado*, further particularizing what was done by Senior Assistant Solicitor General Victor Paladino and Assistant Attorney General Helena Lynch on their behalf, in their names. The substantiating EVIDENTIARY webpage for the “legal autopsy”/analysis is here: <http://www.judgewatch.org/web-pages/searching-nys/force-of-law-commissions/part-hhh-chapter59-laws-2018/delgado-analysis-4-25-21.htm>.

Do you need me to mail you a signed hard copy – and, if so, what complaint numbers should I be including in the transmitting letter? Also, do you need signed, hard copies of the four April 3, 2021 individualized complaint forms, with specifics, that I filed with the Third Department Grievance Committee, which my below April 9<sup>th</sup> e-mail had attached.

Please advise.

Thank you.

Elena Sassower, Director  
Center for Judicial Accountability, Inc. (CJA)  
[www.judgewatch.org](http://www.judgewatch.org)  
914-421-1200

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**From:** Center for Judicial Accountability, Inc. (CJA) <[elena@judgewatch.org](mailto:elena@judgewatch.org)>  
**Sent:** Friday, April 9, 2021 2:48 PM

**To:** 'AD1-AGC-newcomplaints@nycourts.gov' <[AD1-AGC-newcomplaints@nycourts.gov](mailto:AD1-AGC-newcomplaints@nycourts.gov)>

**Cc:** 'ad2-grv2@nycourts.gov' <[ad2-grv2@nycourts.gov](mailto:ad2-grv2@nycourts.gov)>; 'AD3-AGC-IU@nycourts.gov' <[AD3-AGC-IU@nycourts.gov](mailto:AD3-AGC-IU@nycourts.gov)>; 'ad3agc@nycourts.gov' <[ad3agc@nycourts.gov](mailto:ad3agc@nycourts.gov)>

**Subject: February 11, 2021 Attorney Misconduct Complaint  
vs NY Solicitor General Barbara Underwood -- & NY Attorney General Letitia James**

**TO: First Department Attorney Grievance Committee**

I have received no acknowledgment from you concerning my February 11, 2021 attorney misconduct complaint against New York Solicitor General Barbara Underwood that I e-mailed you by the below – and then, on February 12, 2021, sent you by priority mail (#9505514189661043469592), together with its sole enclosure: my February 7, 2021 judicial misconduct complaint, filed with the Commission on Judicial Conduct.

According to the above-attached USPS tracking receipt, it was delivered on February 16, 2021.

By contrast, in response to the same February 11, 2021 complaint, filed with the Second Department Attorney Grievance Committee for the Second, Eleventh, and Thirteenth Judicial Districts against New York Attorney General Letitia James, its Chief Counsel Diana Maxfield Kearsse sent me a March 3, 2021 letter stating that although Attorney General James is admitted in the Second Department, she “is currently registered at a business address in Manhattan”, and, therefore, “the appropriate Grievance Committee is the one in the First Department”.

In the event Chief Counsel Kearsse did not “blind copy” you on her March 3, 2021 letter to me, it is above-attached – as is the complaint form I filed with the Second Department Grievance Committee for my complaint against Attorney General James.

Suffice to further note that in response to the February 11, 2021 complaint, filed with the Third Department Attorney Grievance Committee against four subordinate attorneys in the Attorney General’s office, its Chief Attorney Monica Duffy sent me a March 9, 2021 letter requesting separate complaint forms for each attorney, with specifics as to the misconduct of each.

As the specifics as to those subordinates further substantiate the February 11, 2021 complaint against Attorney General James and Solicitor General Underwood for their wilful violation of their supervisory/managerial responsibilities (Rule 5.1 of the New York’s

Code of Professional Conduct), above-attached are my four separate complaint forms against those attorneys, each dated April 3, 2021.

Everything is posted on CJA's website, accessible from the menu page for the February 11, 2021 complaint, here: <http://www.judgewatch.org/web-pages/searching-nys/attorney-discipline/menu-feb-11-21-complaint-vs-james-etc.htm>.

Finally, above-attached are three superseding pages for the February 11, 2021 complaint, correcting two non-substantive, typo errors on page 5 and page 7, also affecting the layout on page 6. Apologies for any inconvenience.

Thank you.

Elena Sassower, Director  
Center for Judicial Accountability, Inc. (CJA)  
[www.judgewatch.org](http://www.judgewatch.org)  
914-421-1200

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**From:** Center for Judicial Accountability, Inc. (CJA) <[elena@judgewatch.org](mailto:elena@judgewatch.org)>  
**Sent:** Thursday, February 11, 2021 10:09 PM

**To:** 'AD1-AGC-newcomplaints@nycourts.gov' <[AD1-AGC-newcomplaints@nycourts.gov](mailto:AD1-AGC-newcomplaints@nycourts.gov)>

**Subject: Attorney Misconduct Complaint -- NY Solicitor General Barbara Underwood**

**TO: 1<sup>st</sup> Department Attorney Grievance Committee**

Attached is my signed complaint form, plus my complaint & Exhibits A & B. Exhibits C, D, & E will be sent in a separate e-mail, as likewise my accompanying complaint to Commission on Judicial Conduct. All are posted on CJA's website, [www.judgewatch](http://www.judgewatch.org), here: <http://www.judgewatch.org/web-pages/searching-nys/attorney-discipline/feb-11-21-complaint-vs-james-etc.htm>. Hard copy will be mailed.

Thank you.

Elena Sassower, Director  
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914-421-1200