

Center for Judicial Accountability, Inc. (CJA)

From: Center for Judicial Accountability, Inc. (CJA) <elena@judgewatch.org>
Sent: Tuesday, April 27, 2021 10:41 AM
To: 'AD3-AGC-IU@nycourts.gov'; 'ad3agc@nycourts.gov'
Subject: STATUS, SUPPLEMENT, & QUERY: CJA's Feb. 11, 2021 Complaint vs Asst. Solicitors General Victor Paladino & Frederick Brodie & Asst. Attorneys General Helena Lynch & Christopher Liberati-Conant
Attachments: analysis-delgado-4-25-21.pdf

TO: Third Department Attorney Grievance Committee

I have received no acknowledgment from you of the four April 3, 2021 individualized complaint forms, with specifics, that I mailed you on April 8th, signed and dated, for Assistant Solicitors General Victor Paladino and Frederick Brodie and Assistant Attorneys General Helena Lynch and Christopher Liberati-Conant. Chief Attorney Duffy's March 9th letter to me represented that upon your receipt of such complaint forms, the February 11, 2021 conflict-of-interest/misconduct complaint against them "will be reviewed". If so, what numbers have you assigned to the complaint against each of the four attorneys? For your convenience, all of the above is posted on CJA's website, here:

<http://www.judgewatch.org/web-pages/searching-nys/attorney-discipline/feb-11-21-complaint-3rd-dept.htm>.

As a further supplement to the February 11, 2021 complaint and April 3, 2021 complaint forms for Assistant Solicitor General Paladino and Assistant Attorney General Lynch 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*, particularizing same. 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>.

Did you wish me to send you a signed hard copy – and, if so, what complaint numbers should I be including in the transmitting letter?

Thank you.

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

From: Center for Judicial Accountability, Inc. (CJA) <elena@judgewatch.org>
Sent: Thursday, April 8, 2021 3:42 PM
To: 'AD3-AGC-IU@nycourts.gov' <AD3-AGC-IU@nycourts.gov>; 'ad3agc@nycourts.gov' <ad3agc@nycourts.gov>

Subject: DONE! -- printed, signed, dated & mailed: April 3, 2021 Complaint Forms for Feb. 11, 2021 Complaint vs Asst. Solicitors General Victor Paladino & Frederick Brodie & Asst. Attorneys General Helena Lynch & Christopher Liberati-Conant

TO: Third Department Attorney Grievance Committee

Good news! The April 3, 2021 complaint forms – printed, signed, and dated – were mailed today, from the post office – together with superseding pages 5-7 of the February 11, 2021 complaint. And most amazing was that, after buying a

new printer, but before setting it up, I tried my dad's printer one last time, hoping that maybe the jostling when I took it to the store might have adjusted its failed sensor. Success! My dad's printer rallied, enabling me to do the print-outs that I have now sent you.

The four mailed complaints forms are identical to what I e-mailed you on April 6th – except for one change made to the complaint form for Assistant Attorney General Lynch. The change is at page xx, where, at “(2)”, referring to “Judge Hartman’s “‘amended’ May 5, 2017 decision and order [R.52-60]”, the continuation now reads: “which appended to the end of her otherwise unchanged December 21, 2016 decision [R.526-535] the required CPLR §2219(a) recitation of “Papers Considered”, identified as missing by plaintiffs’ February 15, 2017 order to show cause [R.540-541 (¶7)], with further elaboration by its Exhibit U “legal autopsy”/analysis of the December 21, 2016 decision [R.576-577].”

The pdf of the superseding Lynch complaint form is above-attached, as are a separately-scanned signature page for it and for the other three complaint forms.

Everything is posted on CJA's webpage for the February 11, 2021 complaint filed with the Third Dept Attorney Grievance Committee, here: <http://www.judgewatch.org/web-pages/searching-nys/attorney-discipline/feb-11-21-complaint-3rd-dept.htm>.

Thank you.

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

From: Center for Judicial Accountability, Inc. (CJA) <elena@judgewatch.org>

Sent: Tuesday, April 6, 2021 9:57 AM

To: 'AD3-AGC-IU@nycourts.gov' <AD3-AGC-IU@nycourts.gov>; 'ad3agc@nycourts.gov' <ad3agc@nycourts.gov>

Subject: Update -- Revised (& Updated) Complaint Forms for Feb. 11, 2021 Complaint vs Asst. Solicitors General Victor Paladino & Frederick Brodie & Asst. Attorneys General Helena Lynch & Christopher Liberati-Conant

TO: Third Department Attorney Grievance Committee

Just to update you on the situation, on this end, vis-à-vis, my printer, which was formerly my father's – mine having died, last year. It, too, is dying – and will need to be replaced, which I plan to do, later today, by purchasing a new one. Hopefully, tomorrow I will be able to print out the four complaint forms – and sign, date, and mail them to you, as required.

Meantime, I have corrected a typo and added a dropped word to the four complaint forms I sent you yesterday – making a handful of similarly non-substantive changes to the longest – the April 3, 2021 complaint form pertaining to Assistant Attorney General Helena Lynch. The most significant is the clarifying addition of the last words on page ix, “which she based on her December 21, 2016 decision”, that I have preceded with a “—” (dash).

These four minimally-corrected, superseding April 3, 2021 complaint forms are above-attached – and CJA's webpage posting them, with links for the referred-to EVIDENCE, is here: <http://www.judgewatch.org/web-pages/searching-nys/attorney-discipline/feb-11-21-complaint-3rd-dept.htm>. The above-attached February 11, 2021 complaint is the same as I re-sent you yesterday.

Apologies for any inconvenience.

Thank you.

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

From: Center for Judicial Accountability, Inc. (CJA) <elena@judgewatch.org>
Sent: Monday, April 5, 2021 11:36 AM
To: 'AD3-AGC-IU@nycourts.gov' <AD3-AGC-IU@nycourts.gov>; 'ad3agc@nycourts.gov' <ad3agc@nycourts.gov>

Subject: Revised (& Updated) Complaint Forms for Feb. 11, 2021 Complaint vs Asst. Solicitors General Victor Paladino & Frederick Brodie & Asst. Attorneys General Helena Lynch & Christopher Liberati-Conant

TO: Third Department Attorney Grievance Committee

As required by Chief Attorney Monica Duffy's March 9, 2021 letter to me – and as discussed with Investigator Chris Adams on March 30, 2021 – attached, with the required "detail" as to each, are the required four separate complaint forms for each of the above-named four attorneys within your jurisdiction who are complained about by CJA's February 11, 2021 complaint.

Due to a printer problem, which occurred on Friday, April 2nd, I have been unable to print the forms, sign them, and mail them to you, as I had planned to do on April 3, 2021, on what would have been the 97th birthday of my beloved father, George Sassower, Esq., who filed many attorney grievance complaints about how the Attorney General's office operates. Hopefully, technical support will be able to resolve the printer issue, either today or tomorrow. If not, I will be purchasing a new printer by mid-week – and will mail you the four signed original complaint forms thereafter.

Please, in the meantime – and so as not to further delay action on the February 11, 2021 complaint – utilize my original signature that you have on the February 11th complaint form I sent you.

I swear to the truth of the content of the four attached complaint forms under penalties of perjury – and to the February 11, 2021 complaint, here also attached and correcting two non-substantive typo-errors on page 5 and page 7, for which I will mail you superseding pages, including of page 6, affected thereby.

Apologies for any inconvenience.

Thank you.

Elena Sassower, Director
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914-421-1200.