

April 3, 2021 Complaint Form for the February 11, 2021 Complaint
against ASSISTANT ATTORNEY GENERAL CHRISTOPHER LIBERATI-CONANT
revising, as required by Chief Attorney Monica Duffy's March 9, 2021 letter,
the prior submitted February 11, 2021 complaint form – plus updating

TO: Third Judicial Department Attorney Grievance Committee
286 Washington Avenue Extension, Suite 200
Albany, New York 12203-6320
AD3-AGC-IU@nycourts.gov; ad3agc@nycourts.gov

Complainant's Name: Elena Ruth Sassower,
Director/Center for Judicial Accountability, Inc. (CJA)

Street Address: 10 Stewart Place, Apt. 2D-E
White Plains, New York 10603

Phone: (914) 421-1200
Cell: (646) 220-7987
E-Mail: elena@judgewatch.org

Attorney's Name: **Assistant Attorney General Christopher Liberati-Conant**
(registration: #4786976/Albany/(2010))

Address: New York State Attorney General
The Capitol – Albany New York 12224-0341

Litigation Bureau Justice Building, 2nd Floor
Albany, NY 12224

E-Mail & Telephone number: christopher.liberati-conant@ag.ny.gov

1. Have you filed a complaint concerning this matter with another attorney grievance committee, state attorney general's office or any other agency?

YES. I filed this identical February 11, 2021 conflict-of-interest/misconduct complaint with the Second Department Attorney Grievance Committee (for the Second, Eleventh, and Thirteenth Districts), with respect to Attorney General James, and with the First Department Attorney Grievance Committee, with respect to Solicitor General Underwood.

I also filed a related February 7, 2021 conflict-of-interest/misconduct complaint with the Commission on Judicial Conduct against the judges of the Court of Appeals, of the Appellate Division, Third Department, and against Chief Administrative Judge Marks for covering up the misconduct of the Attorney General and attorney staff who are the subject of this complaint. A copy was enclosed with the February 11, 2021 complaint.

On March 5, 2021, I additionally filed a conflict-of-interest/ethics complaint against Attorney General James with the Joint Commission on Public Ethics (JCOPE) and the Legislative Ethics Commission (LEC), furnishing, in substantiation, the February 11, 2021 complaint and its enclosed February 7, 2021 complaint. This March 5, 2021 complaint was filed at the advice/direction of Albany County District Attorney P. David Soares, to whom I had filed a June 4, 2020 grand jury/public corruption complaint pertaining to the fraudulent pay raises of which Attorney General James and her fellow constitutional officers of New York's three government branches are beneficiaries and the budget.

Based on the June 4, 2020 grand jury/public corruption complaint – and 61 materially-identical grand jury/public corruption complaints I thereafter filed with New York's 62 other district attorneys – I also filed a November 4, 2020 corruption complaint with Acting U.S. Attorney for the Northern District of New York Antoinette Bacon, which, by a December 19, 2020 letter, I then sent to the Acting U.S. Attorneys for the Southern, Eastern, and Western Districts of New York.

Action Taken: None, as yet, except that Chief Counsel of the Second Department Attorney Grievance Committee for the Second, Eleventh, and Thirteenth Districts Diana Maxfield Kearsse advised, by a March 3, 2021 letter, that although Attorney General James was admitted in the Second Department, she is “currently registered at a business address in Manhattan” and, “[a]s such, the appropriate Grievance Committee is the one in the First Department”.

2. Have you brought a civil action against this attorney? NO.
3. Are you represented by an attorney? NO.
4. Are you an attorney? NO.

Details of the February 11, 2021 Complaint
against Assistant Attorney General Christopher Liberati-Conant

Assistant Attorney General Christopher Liberati-Conant was the attorney assigned by Attorney General James’ office to defend against (1) *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) – the two cases identified at #4 on page 3 of the February 11, 2021 complaint. His participation therein was improper – and his defense of the state tainted by conflict of interest, if not fraud.

Prior to Mr. Liberati-Conant’s incarnation as an assistant attorney general, he was law clerk to Acting Supreme Court Justice/Court of Claims Judge Denise Hartman. As Justice Hartman’s law clerk, he participated with her in corrupting justice, totally, in *CJA v. Cuomo...Schneiderman...DiFiore* and knew that she had upheld the constitutionality of the “force of law” commission statute it challenged, *as written and by its enactment* – Chapter 60, Part E, of the Laws of 2015 – the subject of its sixth cause of action – as likewise the constitutionality of the state budget, challenged by its fourth, fifth, and ninth causes of action – by fraudulent judicial decisions. *Jastrzemski* and *Hurley* challenged a materially similar “force of law” commission statute enacted, in materially similar fashion, through the budget – Chapter 59, Part XXX, of the Laws of 2019. As such, Assistant Attorney General Liberati-Conant would have reasonably recognized that it was unconstitutional – and that the Attorney General’s duty, as in *CJA v. Cuomo...Schneiderman...DiFiore*, was NOT to defend it.

Judge Hartman’s corrupting of ALL cognizable adjudicative standards in *CJA v. Cuomo...Schneiderman...DiFiore* is summarized by plaintiff-appellants’ 70-page July 4, 2018 appellants’ brief to the Appellate Division, Third Department, substantiated by their record on appeal. Law Clerk Liberati-Conant’s facilitating behind-the-scenes role is most visible in connection with plaintiffs’ March 29, 2017 order to show cause for a preliminary injunction with TRO [R-635-743], as to which plaintiffs had an open-and-shut, *prima facie* entitlement and defendants, represented by Assistant Attorney General Helena Lynch, had no legitimate defense, covered up by Judge Hartman’s indefensible rulings. Start with my March 30, 2017 e-mail to Judge Hartman [R.813-14], pertaining to what had taken place on March 29, 2017 when I presented the order to show cause [R.816-837], sent to her a second time by my April 17, 2017 e-mail [R.810-812], and my e-mailed July 27, 2017 letter to Judge Hartman [R.1282-1291], all three reflecting Law Clerk Liberati-Conant’s knowledge of what was happening, arising from his direct involvement. Further particulars of Judge Hartman’s lawlessness in *Cuomo...Schneiderman...DiFiore*, in which Law Clerk Liberati-Conant was complicit, are set forth by my April 3, 2021 complaint form for the February 11, 2021 complaint against Assistant Attorney General Lynch.

CJA's menu webpage for the February 11, 2021 complaint, at the Attorney Grievance Committee for the Third Judicial Department, from which the complaint and all referred-to substantiating EVIDENCE for it and this complaint form are accessible, is here: <http://www.judgewatch.org/web-pages/searching-nys/attorney-discipline/feb-11-21-complaint-3rd-dept.htm>.