Doris L. Sassower

283 Soundview Avenue
White Plains, New York 10606-3821

Tel: (914) 997-1677
Fax: (914) 684-6554

Elena Ruth Sassower, Paralegal Assistant

BY CERTIFIED MAIL/RRR
P-543-172-749

July 27, 1998

Lee Radek, Chief
Public Integrity Section, Criminal Division
United States Justice Department
10th and Constitution Avenue, N.W.
Washington, D.C. 20530

RE: Request for Criminal Investigation and Prosecution; Endorsement of *amicus* support by the Solicitor General of Supreme Court review of *Sassower v. Mangano, et al.*, Supreme Court Docket #98-106; Notification to Congress

Dear Mr. Radek:

Enclosed is a copy of our July 20, 1998 letter to Solicitor General Seth Waxman, seeking his *amicus* support for Supreme Court review of the petition for a writ of certiorari in *Sassower v. Mangano, et al.* As summarized, *Sassower v. Mangano* is a federal action under 42 U.S.C. §1983 challenging criminal conduct by state public officials, whose odyssey in the Second Circuit has exposed systemic corruption in the Circuit, protecting those state officials. This Second Circuit corruption embraces the judicial and appellate processes, as well as the federal judicial disciplinary mechanism under 28 U.S.C. §372(c). For this reason, the full record in *Sassower v. Mangano* is enclosed so that the Public Integrity Section can undertake the investigation and prosecution that is its statutory duty, as well as expedite the Section's endorsement of our request for the Solicitor General's *amicus* support.

For your convenience, the record in *Sassower v. Mangano* is divided into three folders: The APPEAL, THE CASE MANAGEMENT PHASE, and the POST-APPELLATE PROCEEDINGS. Established, *prima facie*, by the documents comprising the record are the following: (1) that the Second Circuit, on both district and circuit levels, "threw" the case by annihilating *all* cognizable legal standards, including knowing falsification of the factual record; (2) that the Circuit corrupted the §372(c) federal disciplinary process by dishonest decisions, similarly annihilating all cognizable legal standards; (3) that the consequence of this federal judicial misconduct was to protect the high-ranking New York State public officials, sued for corruption and civil rights violations; (4) that at both district and circuit levels the defendant public officials, represented by New York's highest law

enforcement officer, the State Attorney General, himself a co-defendant, engaged in litigation fraud and misconduct; and (5) that such litigation fraud and misconduct was the direct result of the fact that the public official defendants had NO legitimate defense to the verified Complaint's material allegations of their corruption and official misconduct.

The extraordinary material allegations of the Complaint are highlighted by the enclosed cert petition (at pp. 2-5): that judges of New York's Appellate Division, Second Department misused their judicial and disciplinary powers for ulterior and political purposes, viciously retaliating against plaintiff Doris L. Sassower for her judicial whistle-blowing advocacy. That retaliation included, most egregiously, a June 14, 1991 "interim" order, which immediately, indefinitely, and unconditionally suspended plaintiff's law license -- an order *unsupported* by written charges, *without* findings, *without* reasons, and *without* a hearing, which the state judicial defendants knew to be fraudulent and which they thereafter perpetuated by denying, *without* reasons, plaintiff's motions for the immediate vacatur of the suspension to which she was entitled under black-letter law of the New York Court of Appeals, *Matter of Nuey*, 61 N.Y.2d 513, 474 N.Y.S.2d 714 (1984), and *Matter of Russakoff*, 79 N.Y.2d 520, 583 N.Y.S.2d 949 (1992), and by denying her, likewise *without* reasons, any post-suspension hearing, as well as any appellate review. These judicial defendants then subverted plaintiff's attempt to secure independent review by refusing to recuse themselves from the state challenge she brought against them under Article 78 of New York's Civil Practice Law and Rules (CPLR). In this subversion of the most fundamental rules of judicial disqualification and of the purpose of the historic common law writs, as codified in Article 78, the State Attorney General was fully complicitous. It was the State Attorney General's fraudulent conduct in that proceeding which resulted in his being named a defendant in this §1983 federal action.

As alleged by the Complaint -- reproduced, in full, in the cert appendix [A-49-100] -- the consequence of the state judicial defendants' fraudulent suspension of plaintiff's law license was to silence her as a voice for judicial reform, to discredit her, and to stop her legal challenge to the manipulation of state judicial elections by Democratic and Republican party leaders. As alleged, at the time the state judicial defendants issued the "interim" suspension order, plaintiff was *pro bono* counsel in a voting rights case under New York's Election Law, *Castracan v. Colavita*, suing the leaders of the Democratic and Republican parties in the Ninth Judicial District of New York for corrupting state judicial elections. The lawsuit challenged as illegal, unethical, and unconstitutional a written Deal wherein these party leaders traded, by cross-endorsement, seven judgeships, over a three-year period and which bound judicial nominees to terms and conditions including early resignations and a split of party patronage. The party leaders then implemented the Deal at judicial nominating conventions violating New York's Election Law. As alleged, the state judiciary "threw" the *Castracan* case, as well as the related Election Law case, *Sady v. Murphy*, by dishonest decisions which violated elementary legal standards and falsified the factual record. Because of the powerful political interests involved on the state level, plaintiff was unable to secure redress from the other branches of state government either as to the corruption of the state judicial process in those

cases or the unlawful and retaliatory suspension of her law license.

These specific allegations of the Verified Complaint are *not* new to the Justice Department. Nearly four years ago, by letter dated December 30, 1994, the Center for Judicial Accountability, Inc. (CJA) -- the non-partisan, non-profit citizens organization co-founded by the plaintiff and myself -- sent a copy of the §1983 federal Complaint to the Justice Department's Voting Rights Section, then engaged in litigation in which the New York State Attorney General was defending against a Justice Department challenge under the Voting Rights Act to state judicial elections. Such letter followed a series of letters from us, transmitting extensive documentation to the Voting Rights Section, including the full record of the *Castracan v. Colavita* and *Sady v. Murphy* Election Law cases -- cases spearheaded by CJA's predecessor local group. CJA's letters to Chris Herren, an attorney with the Voting Rights Section -- dated April 26, 1994 (Exhibit "A"), May 10, 1994 (Exhibit "B"), May 23, 1994 (Exhibit "C") and December 30, 1994 (Exhibit "D") -- meticulously itemized the transmitted materials and particularized their evidentiary significance in establishing the political manipulation of New York State judicial elections and the judicial process and the complicity of all branches of state government, including state agencies charged with specific oversight and investigatory functions, among them, the New York State Board of Elections, the New York State Commission on Judicial Conduct, and the New York State Ethics Commission.

CJA's initial April 26, 1994 letter to Mr. Herren (Exhibit "A") was quite specific as the seriousness of the corruption, collusion, and cover-up on the state level demonstrated by the transmitted materials and other proffered documentation:

> "Let there be no mistake about it: what is here involved is criminal conduct of the most profound nature, which should be referred for criminal investigation by the Justice Department." (Exhibit "A", p. 5, emphasis in the original)

Indeed, the sentence immediately following pointed out that this was not our first contact with the Justice Department:

> "as early as January 1991, we notified the U.S. Attorney in White Plains (914-993-1902) of the political machinations in the Ninth Judicial District [of New York], affecting the integrity of the franchise and the judiciary, and, in March 1992, transmitted to that office the same full set of papers in Castracan and Sady as is herein being transmitted." (Exhibit "A", p. 5)[1].

These two sentences were quoted, six months later, in CJA's December 30, 1994 letter to Mr.

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[1] CJA's 1991 correspondence with the U.S. Attorney's Office is annexed hereto as Exhibit "E".

Herren, which, after additional description of the on-going cover-up on the state level which we had documented, *expressly* requested referral to the Justice Department's Public Integrity Section (Exhibit "D", p. 2).

Eight months later, with no response either from Mr. Herren or the Public Integrity Section, we sent Mr. Herren a copy of CJA's August 1, 1995 letter to Jonathan Rosenberg, Deputy Chief of the Criminal Division of the U.S. Attorney's office for the Southern District of New York (Exhibit "G-1"), to which we affixed a handwritten note requesting him to find out who we should speak to in the Public Integrity Section (Exhibit "G-2"). That letter described

> "the utter perversion of the Article 78 remedy by the New York Attorney General's office and the New York State courts when what is being challenged are politically powerful judges and the system that protects them".

Enclosed with our letter to Mr. Rosenberg was substantiating proof: papers from *two* separate Article 78 proceedings: (1) the cert papers in plaintiff's Article 78 proceeding against the state judicial defendants, *Sassower v. Mangano, et al.* (S.Ct. #94-1546); and (2) a copy of the record in plaintiff's Article 78 proceeding against the New York State Commission on Judicial Conduct, *Sassower v. Commission on Judicial Conduct of the State of New York* (NY Co. Clerk #95-109141)[2].

We received no response from Mr. Herren. Indeed, there was no response from either the Justice Department's Voting Rights Section or the Public Integrity Section to any of the aforesaid letters and transmitted evidentiary proof. Nor did we receive any response from Mr. Rosenberg, to whom, on August 17, 1995, we hand-delivered a copy of our Letter to the Editor, "*Commission Abandons Investigative Mandate*", published in the August 14, 1995 New York Law Journal, on which we wrote an urgent handwritten note:

> "We need intervention by the U.S. Attorney's office. As the papers in your possession reflect -- the state judicial process has been subverted in order to cover-up and protect judicial corruption in this state. All standards have been abandoned." (Exhibit "G-3").

It took nearly two years for Michelle Hirshman, Chief of the Corruption Unit for the U.S. Attorney's office in the Southern District of New York -- to whom Mr. Rosenberg transmitted our materials -- to respond -- and then only after we wrote her a May 6, 1997 letter complaining of her

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[2] The U.S. Attorney for the Southern District of New York had previously been served with a copy of the Notice of Petition and Verified Petition in that Article 78 proceeding under a Notice of Right to Seek Intervention on behalf of the public. The U.S. Attorney failed to respond thereto (Exhibit "F": Notice of right to Seek Intervention and Notice of Petition).

non-response (Exhibit "G-4"). Her May 19, 1997 letter consisted of a bald and conclusory assertion that "there did not appear to be a basis to initiate a federal criminal investigation"[3] (Exhibit "G-5"). Ms. Hirshman purported that such assessment was based "on review of the documents" we had provided. This, despite the fact that those documents detailed and substantiated that the State Attorney General and state judiciary were utilizing a *modus operandi* of fraud to dispose of Article 78 proceedings challenging state judicial corruption and a pervasive cover-up by state officials and agencies. Six weeks later, Ms. Hirshman sent us a coverletter (Exhibit "G-6") returning the substantiating documents enclosed by our August 1, 1994 letter -- all in uncreased, obviously unread condition. So that you can see this for yourself -- and make your own independent assessment of these documents -- they are enclosed herewith in the same envelope in which Ms. Hirshman returned them to us.

It may be noted that two months after Ms. Hirshman's return of these materials, CJA ran a $3,000 public interest ad in the New York Law Journal, entitled, "*Restraining 'Liars in the Courtroom' and on the Public Payroll*" (8/27/97, pp. 3-4) (Exhibit "I-1"). It detailed the *modus operandi* by which the state Article 78 remedy -- designed to protect the public from governmental corruption and abuse of power -- was itself being corrupted by the State Attorney General in collusion with the state judiciary. Specifically described were the same *two* Article 78 proceedings as to which Ms. Hirshman had opined that there "did not appear a basis to initiate a federal criminal investigation". The ad asserted that the corruption of Article 78 was *easily verifiable* from the record of those cases and supplied the pertinent court index and docket numbers. The ad also asserted that the §1983 federal remedy -- likewise intended as a safeguard against government abuse and corruption -- was being corrupted by the State Attorney General and the federal judiciary, citing the *Sassower v. Mangano* federal action, as to which both the district and Second Circuit docket numbers were provided.

Such prominently-placed ad, which became part of the record before the Circuit in the *Sassower v. Mangano* post-appellate proceedings, is included in the appendix of the enclosed cert petition [A-262-268]. Also included in the appendix [A-269-271] is CJA's $20,000 public interest ad, "*Where Do You Go When Judges Break the Law*?" (Exhibit "I-2"), published on the Op-Ed page of the October 26, 1994 New York Times and, on November 1, 1994, in the New York Law Journal, about the political manipulation of judicial elections, the dumping of plaintiff's Election Law challenge by the state judiciary, its retaliatory suspension of her law license, and the subversion of the state Article 78 remedy by judges who refused to recuse themselves from their own case. As reflected by CJA's

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[3] Ms. Hirshman's May 19th letter (Exhibit "G-5") noted that we had been in contact with the F.B.I. -- a fact readily discernible since the F.B.I. was an indicated recipient of our May 6th letter to her (Exhibit "G-4"). Although we gave the F.B.I an extensive personal interview in July 1996, providing evidentiary materials then and thereafter (Exhibit "H"), corroborative of the corruption of state judicial elections, political manipulation of state judicial appointments, and the pervasive collusion and cover-up by state public officials and agencies, the F.B.I. failed to follow-up -- at least with us.

December 30, 1994 letter to Mr. Herren (Exhibit "D"), "*Where Do You Go When Judges Break the Law?*" was annexed as an exhibit. The ad was also highlighted by CJA's August 1, 1995 letter to Mr. Rosenberg (Exhibit "G-1"), enclosing substantiating proof, described by Ms. Hirshman as not providing "a basis to initiate a federal criminal investigation."

The U.S. Justice Department's profound disinterest and dishonesty in responding to the aforesaid documentary proof of corruption of state judicial elections and the state judicial process in which state officials and agencies, including the State Attorney General, are actively complicitous is inconsistent with the role of the Public Integrity Section, as described in the Section's 1995 Annual Report. The introduction to the Report describes the Section's mandate as "overseeing the federal effort to combat corruption through the prosecution of elected and appointed public officials at all levels of government", with additional responsibility "for supervising the handling of investigations and prosecutions of election crimes". It identifies the Section as having "a staff of approximately 25 to 30 attorneys, including experts in election law..." and functioning "as a source of advice and expertise to prosecutors and investigators" in the U.S. Attorney's offices and Justice Department. This, in addition to sponsoring annual four-day seminars "for prosecutors and agents involved in public corruption investigations and prosecutions", including "legal training in the statutes most commonly used in corruption cases..." (at p. 6).

As best known to the Department, we are not the first Sassowers to present to it proof of New York state judicial corruption and retaliation, as well as of complicity by state officials, including the State Attorney General. For nearly two decades, George Sassower, our whistle-blowing family relative, has been providing similar evidence, together with evidence of conspiratorial cover-up by the federal judiciary, which has similarly "thrown" his lawsuits against state judges and the State Attorney General by fraudulent decisions. As we understand it, the Justice Department's response has been to collusively participate with the federal judiciary in its cover-up of state judicial corruption. Indeed, for many years Mr. Sassower has actively litigated with the Justice Department, based on his claim that it has unlawfully and improperly defended federal judges, sued in their personal capacities by his lawsuits against them, including without "scope" certifications, as required by 28 U.S.C. §2679(d), and without any notice of claim being filed, as required by 28 U.S.C. §2675(a).

Mr. Sassower's allegations of criminal conduct by the Second Circuit -- and of the free legal defense it has obtained from the Justice Department -- were included in a footnote to a §372(c) judicial misconduct complaint we filed in March 1996 against the Circuit's then Chief Judge, Jon Newman -- a copy of which we sent to you under a March 28, 1995 coverletter (Exhibit "J-1"). The coverletter requested that the Public Integrity Section investigate and prosecute Judge Newman and his complicitous Circuit brethren for corruption. The complaint particularized what was involved: Judge Newman had used his judicial office to retaliate against Doris Sassower and myself for our familial relationship with Mr. Sassower by authoring a fraudulent decision in our appeal in *Sassower v. Field.* Such decision imposed, by a *sua sponte* invocation of "inherent power", a $100,000

sanction award against us -- as to which there was not the slightest factual or legal basis -- in favor of fully-insured defendants to whom it was a windfall and whose litigation fraud and misconduct we had documented in an uncontroverted Rule 60(b)(3) motion, which was part of the appeal. Indeed, Judge Newman's decision never once cited to the record or identified a single one of our appellate arguments. Our complaint emphasized that Judge Newman's fraudulent decision was *readily-verifiable*, not only from examination of the factual record, but from the decision itself, which is facially aberrant, contradictory, and violates bedrock law of the Circuit and Supreme Court. Enclosed with the complaint were documents facilitating that verification: our Petition for Rehearing with Suggestion for Rehearing *En Banc* to the Second Circuit and three of our submissions to the Supreme Court -- all of which were copiously cross-referenced to the record and presented controlling law.

Even without the accompanying, referred-to documentation, examination of that §372(c) complaint (Exhibit "J-1") exposes the disingenuousness of the response of your Deputy Chief, Jo Ann Farrington, whose May 17, 1996 letter to us asserted that the Public Integrity Section had "concluded that there is insufficient basis to commence a federal criminal investigation" because "we have no information to suggest that the actions by the judges that you complained of constitutes a federal criminal offense." (Exhibit "J-2"). To advance such pretense, Ms. Farrington purported that the complaint, which she claimed had been reviewed with the accompanying documentation, was about "individual disagreement" with the "rulings against [us]" in the case. By virtue of her high-ranking position in the Public Integrity Section, Ms. Farrington can be assumed to recognize that this is a gross mischaracterization of the complaint -- whose gravamen was retaliation by federal judges motivated by hostility toward George Sassower, as to which the Public Integrity Section had direct personal knowledge -- and which was substantiated by the complaint's fact-specific details and record proof that the *Sassower v. Field* appellate decision was a knowing and deliberate fraud.

At best, Ms. Farrington's letter reinforces that the Public Integrity Section is in dire need of guidance as to when judicial decisions are properly the subject of criminal investigation. The straightforward governing principle, set forth at pp. 25-26 of the enclosed *Sassower v. Mangano* petition and relevant to our request herein for criminal investigation and prosecution of the Second Circuit, is that "judges who render dishonest decisions -- which they *know* to be devoid of factual or legal basis -- are engaging in criminal and impeachable conduct.". *If* the Public Integrity Section does not know this, notwithstanding its expertise in criminal law and public corruption, that is all the more reason for it to endorse the petition's request that the Supreme Court clarify that standard as part of its ethically-mandated referral to the Public Integrity Section and the House Judiciary Committee.

The record in *Sassower v. Mangano* contains the record of the Second Circuit's disposition of our §372(c) complaint against Judge Newman, which was part of plaintiff's October 10, 1997 motion to recuse the Circuit from *Sassower v. Mangano* and to vacate for fraud the appellate panel's Summary

Order and the district judge's Judgment[4]. Examination of the Circuit's disposition of that complaint[5] will give you an additional look at its *modus operandi* of dumping §372(c) complaints by dishonest decisions -- beyond the dishonestly dumped §372(c) complaints against the district judge and appellate panel in *Sassower v. Mangano*. This is important because the cert petition focuses on the Second Circuit's subversion of the §372(c) disciplinary remedy. It is also important because the Justice Department has, knowingly or unknowingly, misled Congress as to the adequacy and efficacy of that remedy ["the 1980 Act"] and as to the existence of other remedies for judicial bias. It has done this by its letters to the House Judiciary Committee's Subcommittee on Courts and Intellectual Property, dated March 10, 1998 and June 10, 1997[6], opposing Sections 4 and 6 of H.R. 1252, addressed to those issues. CJA's own presentation to the House Judiciary Committee on Sections 4 and 6 -- its March 10, 1993 and March 23, 1998 Memoranda -- is part of the record in *Sassower v. Mangano* -- and included in the appendix to the cert petition [A-295, A-301]. Such Memoranda particularize that the Judicial Conference's opposition to those sections was knowingly false and misleading and that the 1993 Report of the National Commission on Judicial Discipline and Removal, on which it relied, is "methodologically flawed and dishonest", particularly in its study of §372(c)

In opposing Section 4, which would have amended §372(c), the Justice Department stated its reliance on the opposition presented by the Judicial Conference, asserting its view "that federal judges can and must be trusted to police their colleagues with respect to allegations of misconduct...". In opposing Section 5, which would have provided for peremptory disqualification of a district judge by civil litigants, the Justice Department, asserted "the provision is unnecessary. There are existing procedures for dealing with cases of judicial bias..." No specification was given as to what those procedures are -- except insofar as the Justice Department quoted a Circuit Chief Judge's view, appearing in The Washington Post, that "the customary recourse for litigants dissatisfied with a trial court's decision has been to pursue an appeal".

We do not know what empirical evidence, if any, was used by the Justice Department to offer to Congress its aforesaid views, on which it knew that Congress would reasonably rely. The 1993

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[4] *See* Exhibits "C", "D", "E", and "F" thereto.

[5] The Circuit's disposition of our §372(c) complaint against Judge Newman is described -- albeit without identifying particulars -- in our published article, "*Without Merit: The Empty Promise of Judicial Discipline*" (The Long Term View (Massachusetts School of Law), Vol. 4, No. 1 (summer 1997)), reprinted in the appendix of the cert petition at A-207-220. [*See* A-217-219].

[6] Those letters, as reprinted in the House Judiciary Committee's Report on H.R. 1252 under the heading "Agency Views", are annexed as Exhibit "K-1" and "K-2".

Report of the National Commission, which interviewed attorneys with the Public Integrity Section and surveyed the Justice Department and U.S. Attorneys, makes plain that the Justice Department had little direct experience with the 1980 Act. In its words, "for all practical purposes, the Department has not played a significant role in calling attention to instances of misconduct or disability cognizable under the 1980 Act." (at p. 72). Indeed, it describes Justice Department attorneys as skeptical about the efficacy of the Act (at p. 71) and, moreover, loathe to file complaints for fear of retaliation against them by vindictive judges (p. 72).

Since the record in *Sassower v. Mangano* establishes the Second Circuit's corruption not only of the §372(c) disciplinary remedy, but of virtually every judicial and appellate remedy for challenging judicial bias -- and the knowledge and complicity of the Judicial Conference, to which we long ago supplied the record -- it is incumbent on the Justice Department to revise its unsubstantiated views on Sections 4 and 6 and so inform Congress so that legislative steps can be taken to protect the public. This, together with a recommendation for impeachment of the involved Second Circuit judges.

Finally, the Justice Department should explain to Congress why, notwithstanding the requirement of 28 U.S.C. §529 that the Attorney General annually "report to Congress on the activities and operations of the Public Integrity Section" (Exhibit "L-1"), the Public Integrity Section's most recent Annual Report is for 1995 (Exhibit "L-2").

Yours for a quality judiciary and government integrity,

Elena Ruth Sassower

ELENA RUTH SASSOWER, Paralegal Assistant

Letter Read and Approved by:

Doris L. Sassower

DORIS L. SASSOWER
Petitioner *Pro Se*, *Sassower v. Mangano, et al.*

Enclosures: (1) July 20, 1998 ltr to Solicitor General Waxman, with all indicated enclosures thereto
(2) record in *Sassower v. Mangano, et al.*, #98-106
(3) envelope of materials returned by Michelle Hirshman, by 6/27/97 coverltr (Exhibit "G-5") [inventoried by CJA's 8/1/95 ltr (Exhibit "G-1") and including the original 8/17/95 note (Exhibit "G-3")

cc: *See* next page

cc: Seth Waxman, U.S. Solicitor General
The Justices of the U.S. Supreme Court
Voting Rights Section, U.S. Department of Justice
Att: Chris Herren, Esq.
U.S. Attorney, Southern District of New York
Att: Michael Horowitz, Chief, Public Corruption Unit
Att: Mark Pomerantz, Chief, Criminal Division
House Judiciary Committee: Subcommittee on Courts and Intellectual Property
Att: Mitch Glazier, Chief Counsel
Att: Robert Raben, Minority Counsel
Judicial Conference of the United States
c/o Administrative Office of the United States Courts
Att: William Burchill, Jr., General Counsel
Jeffrey Barr, Assistant General Counsel
Commission on Structural Alternatives for the Federal Courts of Appeals
Att: Byron White, Chairman
New York State Attorney General Dennis Vacco,
Counsel for *Mangano et al.* respondents

EXHIBITS TO JULY 27, 1998 LETTER TO LEE RADEK, CHIEF, PUBLIC INTEGRITY SECTION, U.S. DEPARTMENT OF JUSTICE

Exhibit "A":	CJA's 4/26/94 letter to Chris Herren, Esq, Civil Rights Division: Voting Section, Justice Department
Exhibit "B":	CJA's 5/10/94 letter to Chris Herren, Esq.
Exhibit "C":	CJA's 5/23/94 letter to Chris Herren, Esq.
Exhibit "D":	CJA's 12/30/98 letter to Chris Herren, Esq.
Exhibit "E-1":	DLS' 1/10/91 ltr to Michael Tabak, Esq., U.S. Attorney's Office, Southern District of New York
Exhibit "E-2":	1/16/91 ltr from Lisa Smith, Assistant U.S. Attorney, U.S. Attorney's Office, Southern District of New York
Exhibit "E-3"	DLS' 1/28/91 ltr to Michael Tabak/Lisa Smith
Exhibit "E-4":	DLS' 3/28/91 ltr to Lisa Smith
Exhibit "E-5":	4/2/91 ltr from Lisa Smith
Exhibit "F":	*Sassower v. NY Commission on Judicial Conduct*, Notice of Right to Seek Intervention and Notice of Petition
Exhibit "G-1":	CJA's 8/1/95 ltr to Jonathan Rosenberg, Deputy Chief, Criminal Division, U.S. Attorney's Office, Southern District of New York
Exhibit "G-2":	CJA's handwritten note to Chris Herren
Exhibit "G-3":	CJA's 8/17/95 handwritten note with NYLJ Letter to the Editor, "*Commission Abandons Investigative Mandate*", hand-delivered for Jonathan Rosenberg
Exhibit "G-4":	CJA's 5/6/97 ltr to Michelle Hirshman, Chief, Public Corruption Unit, U.S. Attorney's Office, Southern District of New York
Exhibit "G-5":	5/19/97 ltr from Michelle Hirshman
Exhibit "G-6":	6/27/97 ltr from Michelle Hirshman

Exhibit "H-1":	CJA's 7/10/96 fax to Tim Lauzon, Special Agent C-14, FBI
Exhibit "H-2":	CJA's 5/6/97 fax to Tim Lauzon
Exhibit "H-3":	CJA's 5/6/97 fax to Tim Lauzon
Exhibit "H-4":	CJA's 6/17/97 fax to Robert Newendorf, agent, FBI
Exhibit "I-1":	CJA's public interest ad, "*Restraining 'Liars in the Courtroom' and on the Public Payroll*", NYLJ, 8/27/97, pp. 3-4
Exhibit "I-2":	CJA's public interest ad, "*Where Do You Go When Judges Break the Law?*", NYT, 10/26/94, Op-Ed page
Exhibit "J-1":	CJA's 3/28/96 ltr to Lee Radek, Chief, Public Integrity Section, Justice Department, with criminal complaint against Second Circuit Chief Judge Jon Newman
Exhibit "J-2":	5/17/96 ltr of Jo Ann Farrington, Deputy Chief, Public Integrity Section, Justice Department
Exhibit "K-1":	Justice Department's 3/10/98 ltr to Chairman Henry Hyde, House Judiciary Committee, as reprinted in Committee Report on H.R. 1252 (#105-478)
Exhibit "K-2:	Justice Department's 6/10/97 ltr to Chairman Henry Hyde, House Judiciary Committee, as reprinted in Committee Report on H.R. 1252 (#105-478)
Exhibit "L-1":	28 U.S.C. §529. Annual Report of Attorney General
Exhibit "L-2":	7/20/98 ltr from Anne J. Savage, Paralegal Specialist, Public Integrity Section, Justice Department

INVENTORY OF RECORD
Doris L. Sassower v. Mangano, et al.

THE APPEAL (Second Circuit #96-7805):

1. Plaintiff's Appellant's Brief (1/10/97)
2. Record on Appeal
3. Defendants' Appellees' Brief (3/4/97)
4. Appellant's Reply Brief (4/1/97)
5. Appellate Panel's Summary Order (9/10/97) (Meskill, Jacobs, Korman)

APPELLATE CASE MANAGEMENT PHASE (Second Circuit):

1. Appellant's Recusal/Sanctions Motion (4/1/97)
2. Affidavit of Assistant Attorney General Weinstein (in opposition) (4/16/97)
3. Appellees' Memorandum of Law in Opposition (4/16/97)
4. Appellant's Affidavit in Reply and in Further Support of Appellant's Motion (4/23/97)
5. Appellant's Supplemental Affidavit (4/28/97)
6. Second Circuit's one-word Order, "DENIED" (4/29/97) (Kearse, Calabresi, Oberdorfer)

POST-APPEAL PROCEEDINGS (Second Circuit):

1. Appellant's Petition for Rehearing with Suggestion for Rehearing *In Banc* (9/24/97)
2. Appellant's Recusal/Vacatur for Fraud Motion (10/10/97)
3. Appellate panel's one-word Order, "DENIED" (10/22/97) (Jacobs, Meskill, Korman)
4. Appellant's §372(c) complaint against District Judge John Sprizzo (10/28/97)
5. Appellant's §372(c) complaint against three-judge Second Circuit appellate panel (11/6/97)
6. Second Circuit's Order denying rehearing (12/17/97); issuance of Mandate (12/29/97)
7. Second Circuit Chief Judge Winter's Order dismissing the §372(c) complaints (2/9/98)
8. Appellant's Petition to the Second Circuit Judicial Council for review of the dismissal of her §372(c) complaints (4/3/98)
9. Second Circuit Judicial Council's Order dismissing Appellant's §372(c) complaints (5/6/98)
10. Second Circuit's letter as to the identity of the Judicial Council panel (5/8/78) (Kearse, Leval, Sifton, Murtha)

UNITED STATES SUPREME COURT

1. Petition for a Writ of Certiorari, #98-106, docketed 7/20/98

P 543 172 749

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Street & Number 10th + Constitution NW	
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Postage	$ 1.30
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Return Receipt Showing to Whom & Date Delivered	1.10
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$ 16.75
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PS Form **3800**, April 1995

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.
1. ☐ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to:
Lee Radek, Chief
Public Integrity Section
US Justice Dept
10th + Constitution NW
Washington, DC 20530
DEPARTMENT OF JUSTICE

4. Article Number
P-543-172-749

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X

6. Signature — Agent ~~JUL 3 0 1998~~
X

7. Date of Delivery Elwood C. Robinson
~~Elwood C. Robinson~~

8. Addressee's Address *(ONLY if requested and fee paid)*

PS Form 3811, Feb. 1986

DOMESTIC RETURN RECEIPT