

February 4, 2008

To State Commission on Judicial Conduct

RE: COMPLAINT AGAINST JUDGE KEVIN RYAN OF SUPREME COURT

Dear Commission,

Judge Kevin Ryan acted in violation of:

- A. The **Canon 1 of Judicial Conduct** when he failed *to maintain and enforce high standards of conduct and to personally observe those standards.*
- B. The **Canon 2 of Judicial Conduct** when he failed *to avoid impropriety and the appearance of impropriety and when he failed to respect and comply with the law and act in a manner promoting public confidence in the integrity and impartiality of the judiciary.*
- C. The **Canon 3 of Judicial Conduct** when he failed *his adjudicative responsibility to be faithful to the law, to perform his judicial duties without bias or prejudice in favor of any person, to accord me the right to be heard according to the law and when he initiated and/or permitted ex parte communications outside of my presence which had nothing to do with scheduling or administrative duties.*

When

1. Judge Ryan knowingly accepted perjury (Exhibit C - last five pages attached).
2. Judge Ryan unethically ruled with bias that pro se persons have tremendous advantages over attorneys and takes some rights from a pro se allowed to attorneys to eliminate this injustice.
3. Judge Ryan unethically ruled with bias that Pro Se cannot impeach a witness's testimony with deposition testimony, nor impeach the testimony of a witness with the witness's affidavits or court documents in the same action, nor ask about sworn items in the complaint.
4. Judge Ryan refused with bias to allow any subpoenas for pro se and reverses the order of closing arguments - A Pro se defendant goes first in the closing argument.
5. Judge Ryan unethically allowed Ara Asadourian to claim this is the worst case of abuse he has seen in 25 years.
6. Judge Ryan unethically allows Ara Asadourian to yell at witnesses and at me and failed in his legal and ethical duty is to act against Asadourian.
7. Judge Ryan deliberately and unethically and with bias failed to support the strict requirements of the law for this marriage of long duration as noted in the Kaplan v Kaplan 2007 NY Slip Op 09734 : *With respect to cruel and inhuman treatment the Court noted that the marriage was one of long duration, and thus, a high degree of proof was required for termination on the grounds of cruel and inhuman treatment.*
8. Judge Ryan unethically allowed Ara Asadourian to engage in the following unethical conduct:

A. Asadourian yelled for long continuous periods at the defendant to harass and maliciously hurt him and his reputation.

B. Asadourian told the jury this was the worst case of abuse he has ever seen more than 25 years.

C. Asadourian introduced inadmissible evidence and testimony concerning acts in 1983 and in all the intervening years before the five-year statute limitation on claims. This inadmissible evidence concerned court cases from 25+ years ago that were inadmissible in this action. The testimony which was introduced was false and Asadourian knew it to be false since neither he nor his testifying client knew the evidence introduced because its content could only be obtained from sealed records inaccessible to Asadourian or his client.

D. Asadourian introduced false claims concerning other law suits which were settled out of court and settlements sealed.

E. Asadourian unethically claimed the above suits were false even though he had no knowledge of the confidential settlements.

F. Asadourian claimed and reported as his own knowledge the results of confidential proceedings before the Office of Professions in which he had no part.

G. Asadourian continually for hours stated and alluded to matters that he knew were not supported by admissible evidence.

H. Asadourian stated and alluded to the fact that the defendant had not paid any child support for his child when he had no knowledge of any missing child support or any orders of any court for child support. The Defendant paid any and all orders of child support for any children he has ever had. Asadourian's false claim was malicious, fraudulent and not admissible even if it were true and damaged the defendant before the jury.

L. Asadourian stated, alluded to and presented as evidence in this action information concerning the employment, work and earned income of the defendant when such claims were inadmissible and false and were more than ten to twenty years old.

**9. During the trial, Judge Ryan unethically and with bias made false specious claims to the jury that a pro se had a large advantage over an attorney and the court must make compensatory restraints on the pro se litigants that are not made on the attorney. This is garbage and was unethical to claim or enforce.**

10. Judge Ryan unethically and with bias presided over this trial while an action in the Appellate Division was being heard involving Judge Ryan and the defendant.

11. Judge Ryan unethically and with bias allowed the jury to hear statements by Asadourian concerning the merits of the action against the Judge and refused to allow the defendant to

respond to the claims concerning the Appellate action involving the Judge and the defendant.

12. Judge Ryan unethically and with bias failed to give me the only subpoena he promised in his pre trial conference for Victoria Finnan.

13. Judge Ryan unethically and with bias had the defendant make his closing argument to the jury before the plaintiff's closing argument.

14. Judge Ryan unethically and with bias allowed lengthy false testimony concerning a prior (25 years ago) divorce and then refused to allow the defendant to counter that testimony.

15. Judge Ryan unethically and with bias allowed Ara Asadourian to tell the jury that this was the worst case of abuse he had seen in 25 years as a lawyer and former District Attorney.

**16. Judge Ryan unethically allowed Ara Asadourian to abuse two witnesses as described in attached affidavits of Dr. Smith and Father O'Reilly.**

Sincerely you,

Terence Finnan  
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