

GEORGE SASSOWER

16 LAKE STREET
WHITE PLAINS, N. Y. 10603

914-949-2169

May 25, 1994

Departmental Disciplinary Committee
First Judicial Department
41 Madison Avenue,
New York, NY 10010

Re: Hal R. Lieberman, Esq.
c/o Departmental Disciplinary Committee
41 Madison Avenue,
New York, NY 10010

Gentlemen:

I here file professional disciplinary charges against Hal R. Lieberman, Esq., relating to the false and deceptive assertions made in his signed charges against Sam Polur, Esq., on April 21, 1989, a copy of which I saw for the first time last week.

If those charges made by Hal R. Lieberman, Esq., were sworn to or affirmed under penalty of perjury, the charges alleged herein against Mr. Lieberman, should also include perjury.

1. I initially note that on April 21, 1989, Hal R. Lieberman, Esq. and/or his office had in their possession my uncontroverted and ante litem motam, contrary statements to those set forth in his April 21, 1989 Statement of Charges.

2a. The essential statements contained in those charges had to have been known, or recognized, by Mr. Lieberman to have been false.

b. These false statements in the Statement of Charges, along with the language employed, clearly contain the markings of Donald F. Schneider, Esq., as the informer.

3a. The essential allegation in Charge One is that:

"Sassower continued to engage in extensive litigation ostensibly on behalf of Raffe and adverse to Puccini. On or about December 14, 1984, Sassower retained [Polur] to serve as Sassower's affiliate and associate in Puccini proceedings for Raffe." [emphasis supplied]

b. Mr. Lieberman did not know then, and does not know now, of any instance wherein I represented Raffe "adverse to Puccini", or any rational reason for my representing, on behalf of Raffe, any position "adverse to Puccini".

c. Mr. Lieberman was not aware then, and is not aware now, of any instance wherein Polur, at any time, represented an interest "adverse to Puccini" or any rational reason for Polur representing such "adverse" position.

d. Thus, it follows, Polur never violated the so-called "disqualification order" if, indeed, such "disqualification order" ever had any legal existence, a matter left for another day.

4a. Charge Two states that Polur served:

"Donald Schneider, Esq., a member of FKM, a summons in an action entitled Raffe v. Feltman, Karesh & Major seeking money damages ..."

b. Polur was found not-guilty of that charge by Judge David B. Saxe, and if a conviction is preclusive, then a failure to convict should also be preclusive.

5a. Charge Three is the conviction by Mr. Justice Alvin F. Klein of Polur based upon the false and perjurious Schneider affidavit.

b. Neither Mr. Schneider, nor anyone else at the scene at the time has, at any time or place, denied that such Schneider affidavit of service by Polur was false -- never--never.

c. More important, is that Raffe who was simultaneously convicted, has paid, mostly to the Schneider firm, more than \$2,000,000, for not similarly being incarcerated under the same Klein Order.

d. Also important is that who gave Mr. Lieberman the constitutional power to override the ex post facto prohibition in the U.S. Constitution (Article 1 §10) by elevating an "offense" to a "serious" crime.

6a. In view of the present legal problems of President William J. Clinton, Charge Four is of particular significance.

b. There are some who assert that President Clinton, by reason of his office, should be given a "stay" from all personal lawsuits, during his term of office.

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c. Only by resort to Title 11 of the United States Code, the Bankruptcy Code, as everyone knows, including Mr. Lieberman, can any person be discharged of the claims against him, including the President of the United States.

7a. Subject to the receipt of further documents on the Polur matter, the aforementioned is submitted.

b. Considering the expense imposed upon the sovereign and its taxpayers, the injuries caused, and other factors, including Mr. Lieberman's official office, which he betrayed, his disbarment is mandatory and should be swift.

Very truly yours,

GEORGE SASSOWER

cc: Hal R. Lieberman, Esq.
Halburton Fales, 2d, Esq.
Donald F. Schneider, Esq.