

PEOPLE OF THE STATE OF NEW YORK, ex' rel.,
PUCCINI CLOTHES, LTD., a helpless judicial Index No.
ward; GEORGE SASSOWER, individually and on 10311-1986
behalf of HYMAN RAFFE, a judicial hostage,
 Petitioners,

for the appointment of a Special
Prosecutor, pursuant to
County Law §701

PLEASE TAKE NOTICE, that upon the annexed
 GEORGE SASSOWER, Esq., dated April 21, 1985,
 the pleadings and proceedings had
 in, the undersigned will move this Court
 Motion Part, of the Supreme Court of the
 York, County of New York, held at the
 ereof, 60 Center Street, in the Borough of
 y and State of New York, on the 14th day
 at 9:30 o'clock in the forenoon of that
 n thereafter as Counsel may be heard, for
 inting a Special Prosecutor, pursuant to
 701, with respect to the arrests and
 ecution of persons for their criminal

involvement with respect to PUCCINI CLOTHES, LTD., together with any other, further, and/or different relief as to this Court may seem just and proper in the premises.

PLEASE TAKE FURTHER NOTICE, that opposing papers, if any, are to be served five (5) days before the return date of this proceeding, with an additional five (5) days if service is by mail.

Dated: April 21, 1986

Yours, etc.,

GEORGE SASSOWER, Esq.
Attorney for petitioner
51 Davis Avenue,
White Plains, N.Y. 10605
914-949-2169

To: Hon. Robert Morgenthau

[6-14]

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PUCCINI CLOTHES, LTD., a helpless judicial Index No.
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behalf of HYMAN RAFFE, a judicial hostage,
Petitioners,

TO THE JUSTICES OF THE SUPREME COURT OF THE STATE OF NEW YORK:
COUNTY OF NEW YORK:

The petition of GEORGE SASSOWER, Esq., individually and on behalf of PUCCINI CLOTHES, LTD. ["Puccini"], a helpless judicial ward, and HYMAN RAFFE ["Raffe"], a judicial hostage, respectfully shows this Court, and alleges:

1a. This proceeding seeks to appoint a Special Prosecutor to prosecute those petitioner has or intends to accuse and/or arrest of larceny of judicial trust assets, perjury, criminal extortion, criminal conspiracy, criminal accessorial conduct, criminal facilitation, and/or other crimes.

b. Petitioner has and intends to make divers accusations and arrests of various persons pursuant to Criminal Procedure Law §140.30 et seq., and believes that it would be inappropriate for the District Attorney, Hon. ROBERT MORGANTHAU, to prosecute them, since they include high judicial and executive officials.

2a. The crimes for which such persons will be arrested are bottomed on the unlawful dissipation of the judicial trust assets of PUCCINI CLOTHES, LTD. ["Puccini"], a corporation involuntarily dissolved on June 4, 1980 -- soon entering its seventh year -- without any accounting having ever been filed, final or intermediate.

b. Puccini, although involuntarily dissolved, is still a "person" within the meaning of the XIV Amendment of the Constitution of the United States, Article 1, §§6, 11 of the Constitution of the State of New York, and various other statutory provisions, enacted thereunder, although to the accused it was, and is, merely a "judicial fortune cookie"!

c. Since June 4, 1980, Puccini's judicial assets were massively and unlawfully raped and ravished, aided and abetted by members of the judiciary and executive department, who thereafter by unlawful means, extorted or attempted to extort silence and submission by those having a legitimate interest in such judicial trust assets, including Raffae and petitioner.

d. The evidence supporting the aforementioned charges is clear, documented, and uncontroverted, and indeed, in many instances, effectively confessed.

3a. The immediate criminals involved in the larceny of Puccini's trust assets, the perjury to conceal and advance same, and the judicial and official corruption were KREINDLER & RELKIN, P.C. ["K&R"]; DONALD B. RELKIN, Esq. ["Relkin"]; MICHAEL J. GERSTEIN, Esq. ["Gerstein"]; ROBERT J. MILLER, Esq. ["Miller"]; CITIBANK, N.A. ["Citibank"]; CHARLES ZANGARA ["Zangara"]; JEROME H. BARR, Esq. ["Barr"]; ARUTT, NACHAMIE, BENJAMIN, LIPKIN & KIRSCHNER, P.C. ["ANBL&K"], succeeded by NACHAMIE, KIRSCHNER, LEVINE, SPIZZ & GOLDBERG, P.C. ["NKLS&G"]; BARTON NACHAMIE, Esq. ["Nachamie"]; ARTHUR GOLDSTEIN, Esq. ["Goldstein"]; FELTMAN, KARESH, & MAJOR, Esqs. ["FK&M"]; succeeded by FELTMAN, KARESH, MAJOR, & FARBMAN, Esqs. ["FKM&F"]; LEE FELTMAN, Esq. ["Feltman"]; and DONALD F. SCHNEIDER, Esq. ["Schneider"]; and some others.

b. Directly involved in criminal conduct in this matter are Administrator XAVIER C. RICCOBONO, Mr. Justice IRA GAMMERMAN, Referee DONALD DIAMOND, and Senior Attorney, DAVID S. COOK, Esq., of the Attorney General's Office.

c. Participating in criminal conduct in the Puccini matter are Mr. Justice ALVIN F. KLEIN; Mr. Justice DAVID B. SAXE; Mr. Justice MARTIN H. RETTINGER; Chief Administrator JOSEPH W. BELLACOSA; Presiding Justice FRANCIS T. MURPHY; Associate Justices, THEODORE R. KUPFERMAN, JOSEPH P. SULLIVAN, BENTLEY KASSAL, ERNST H. ROSENBERGER, and others.

d. Also criminally involved are the Attorney General, ROBERT ABRAMS, and members of the Sheriff's Offices of the City of New York and Nassau County.

4a. The massive larceny of Puccini's trust assets after June 4, 1980, engineered by K&R, is fully documented and uncontroverted!

b. The perjury of K&R, Barr, and Citibank, to conceal and advance such larceny, was and is also fully documented and uncontroverted!

c. The participation of ANBL&K, FK&M, and various members of their firms in such larceny, perjury, and corruption is also documented and uncontroverted!

d. The "hard evidence" of the aforementioned larceny, perjury, and corruption surfaced on November 7, 1983, -- three and one-half years after the decree of dissolution -- and during the months that followed an avalanche of additional "hard evidence" evidence surfaced, including effective confessions.

5a. The aforementioned "felons with law degrees" thereupon solicited for the intervention of their corrupt judicial and official "friends", including Administrator XAVIER C. RICCOBONO.

b. Aided and abetted by various members of the judiciary, especially at nisi prius by Administrator RICCOBONO, Mr. Justice GAMMERMAN and Referee DIAMOND, effective control of the judicial system was turned over to these "felons with law degrees"!

c. Having effective control of the judicial system, the "felons with law degrees", have employed the "machinery of justice" to plague those who have opposed and exposed them with about every remedy generally given to the righteous to be inflicted upon the wicked, and much more!

d. Thus, without any exception, the sinners and the wicked are afforded a trial before they are convicted, sentenced, and incarcerated for any alleged crime, absent a plea of guilty!

e. This was not to be true when these "felons with law degrees" took control the "machinery of justice", as petitioner and SAM POLUR, Esq. ["Polur"] were convicted, sentenced, and incarcerated, without benefit of trial, although ministerially compelled by the Constitution of the United States and Constitution of the State of New York!

f. Petitioner's "crime" is that he, having a personal and professional interest in Puccini, the helpless judicial eunuch, has given it a "tongue"!

g. Extortion, by compounding of sham crimes, and foregiveness of unlawful penalties to those who succumb, have become and are the "coins of the judicial realm" in the Puccini matter!

h. The honest and decent jurists at nisi prius flee, or attempt to do so, leaving the few corrupt to fill the vacuum. Thus, as stated by Edmund Burke:

"The only thing necessary for the triumph of evil is for good men to do nothing."

6a. It is not petitioner's purpose to set forth herein the conduct and crimes of each of the aforementioned.

b. Some of such evidence will be turned over to the District Attorney, and others in the criminal justice system, state as well as federal, and other interested groups, including the media, by separate delivery.

c. Nevertheless, one particular matter is sufficiently base and transcends the Puccini litigation, that an exception is made herein.

7a. The assets of an involuntarily dissolved corporation vests "in the people"; custody is with the courts; and when a receiver is appointed he must, as part of his act of qualifying, file a bond in favor of "the people" (Business Corporation Law §1204[a][2]).

b. It is only the court or its appointees who can unlawfully and/or wrongfully dissipate the trust assets of the involuntarily dissolved corporation, since it is they who have title and possession.

c. It is only the Attorney General who has sufficient "clout" to prevent wrongdoing by the courts and its appointees, thereby protecting those having legitimate interests in such assets!

d. Consequently, the Business Corporation Law, grants to the Attorney General both discretionary and mandatory powers and obligations.

e. Clearly then, particularly as to the discretionary powers and obligations, the Attorney General must assure himself of the integrity of those who are designated to be the statutory watchdog of such trust assets.

f. Otherwise stated, the assistants appointed to be the statutory watchdogs, cannot be simultaneously assigned to represent the judiciary and/or its appointees and the judicial trust!

8a. At the Attorney General's Office, at 2 World Trade Center, the one-man unit to protect the rights of those having an interest in involuntarily dissolved corporations, is Senior Attorney, DAVID S. COOK, Esq. ["Cook"].

b. Each year, by February 1, the Receiver must serve and file a Business Corporation Law §1207 statement, and since 1984, at least, Mr. Cook has actually known the statements served and filed by Feltman, the Puccini-receiver, were false and deceptive, and he has done nothing!

c. The Attorney General must bring a proceeding to compel an accounting where one has not been filed in eighteen months (Business Corporation Law §1216).

It will soon be seventy-two months since Puccini was involuntarily dissolved, and Cook has not compelled Feltman to account.

On the contrary, he has taken whatever affirmative steps that were necessary to delay and prevent such accounting by the Receiver!

9a. Of all the assistant attorney generals available, the usual rotation system in the attorney general's office was abandoned, and Cook was commandeered and designated to represent Administrator Riccobono and the entire judicial thrall, at nisi prius and elsewhere!

b. In each instance, in this dual and simultaneous representation, Cook has abandoned the interests of Puccini, the trust "of the people", the state, and judiciary, in favor of the adverse interests!

10a. Consequently, Feltman, and his law firm, have been compensated with all of Puccini's liquid assets, a sum which exceeds a half a million dollars, when it cannot show \$5 worth of effort intended to benefit Puccini or which indeed benefited such trust.

b. All of the efforts of Feltman and his law firm have been to conceal the massive larceny engineered by K&R, acting adverse to their trust, engaging in corruption and corrupt practices, and pursuing those who have attempted to protect their client's and their own legitimate and lawful rights.

11. There is no doubt that the aforementioned accused will be afforded their full panoply of criminal rights, and only by the appointment of a special prosecutor can the rights "of the people" be protected.

WHEREFORE, it is respectfully prayed that the petitioner herein be granted in all respects.

Dated: April 21, 1986

GEORGE SASSOWER

Verified April 21, 1986