United States District Court

EASTERN DISTRICT OF ARKANSAS

IN THE MATTER OF A GRAND JURY APPLICATION OF

GEORGE SASSOWER

v.

U.S. ATTORNEY CHARLES A. BANKS
Respondent.

SUMMONS IN A CIVIL ACTION

CASE NUMBER:

TO: (Name and Address of Defendant)

YOU ARE HEREBY SUMMONED and required to file with the Clerk of this Court and serve upon

PLAINTIFF'S ATTORNEY (name and address)

GEORGE SASSOWER
16 Lake Street
White Plains, NY 10603-3852

an answer to the complaint which is herewith served upon you, within ______ days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

______
CLERK

______
DATE

______
BY DEPUTY CLERK

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS

---x

In the Matter of a Grand Jury Application by GEORGE SASSOWER, Petitioner,

-against-

U.S. Attorney CHARLES A. BANKS, Respondent.

Docket No.

---x

Petitioner, as and for his petition, respectfully sets forth and alleges:

1a. Petitioner brings this proceeding directly under the Constitution and laws of the United States.

b. Jurisdiction in the United States District Court exists by virtue of 28 U.S.C. §1331, §1346 and §1361.

2a. Petitioner is a born American citizen, battle-starred veteran of World War II, and oath bound to protect and defend the United States Constitution.

b. Petitioner's constitutional and legal rights include his right to petition government for redress of his grievances, a right guaranteed by, inter alia, Article III, Amendments I, V, and XIV of the United States Constitution and federal laws enacted thereunder.

c. The grand jury is one of the agencies of government to which petitioner has the constitutional right to petition where the purpose is to advise that body of criminal activities, a legal right recognized in, inter alia, 18 U.S.C. §1504, §3332[a].

3a. The grand jury has the "duty" to make inquiry into the commission of alleged criminal offenses within its bailiwick (18 U.S.C. §3332[a]), which requires an unobstructed line of communication with those who have knowledge of such activity.

b. 18 U.S.C. §3332[a] articulates the historic "sword" duty of the grand jury and the mode of communication to that body by the private person:

> "It shall be the duty of each grand jury impaneled within any judicial district to inquire into offenses against the criminal laws of the United States alleged to have been committed within that district. Such alleged offenses may be brought to the attention of the grand jury by the court or by any attorney appearing on behalf of the United States for the presentation of evidence. Any such [U.S.] attorney receiving information concerning such an offense from any other person shall, if requested by such other person, inform the grand jury of such alleged offense, the identity of such other person, and such attorney's action or recommendation." [emphasis supplied]

4a. Although the authority and power of the grand jury to inquire into criminal activities is not dependent on the will or consent of the prosecutor or the court, the general mode of communication by a private person to the federal grand jury is through the U.S. attorney (e.g., 18 U.S.C. §1332[a]) and/or the federal district court (e.g., 18 U.S.C. §4).

b. Once the U.S. attorney or the court receives a communication intended for the grand jury, related to criminal activity not then being considered by that body, such communication, if proper in substance and form, must be forwarded to the grand jury, as a matter of ministerial compulsion, permitting no discretion whatsoever (In re Grand Jury Application, 617 F. Supp. 199 [SDNY-1985]).

c. Access to the grand jury herein would have a direct and personal effect on petitioner and his vested constitutional personal and property rights.

5a. Clearly established, fundamental, and an essential element of American law, is that no person, no matter how exalted his status, including judges and prosecutors, are above the criminal laws of our society. They have no special immunity from a grand jury investigation and inquiry.

b. The object of this intended Grand Jury presentment is U.S. Circuit Court Judge RICHARD S. ARNOLD ["Arnold"] of the Eighth Circuit, a resident of this district.

6a. Petitioner's desires to bring to the attention of the grand jury criminal events involving Judge Arnold, within its legal competence.

b. Outside of the grand jury room, and certainly not prior to petitioner's presentation to such body, petitioner cannot include all the criminal acts committed by Judge Arnold.

7a. Members of the Department of Justice and Judge Arnold have committed and are continuing to commit a conscious, blatant and criminal fraud upon the federal government and treasury.

b. The representation, at federal cost and expense, of federal judges and officials who are diverting monies payable "to the federal court" to the private pockets of their cronies, without a 28 U.S.C. §2679[d] scope certificate, makes this matter a concern of Congress, public interests organizations, and the media, in addition to the grand jury.

c. The statutory scheme for federal governmental tort liability and the decisions thereunder is clear, settled and uniform:

(1) The plain language of 28 U.S.C. §2679[d] reads that unless the Attorney General certifies that an official "was acting within the scope of his office or employment" he cannot be defended at federal cost and expense.

(2) The reason there is no "scope certification" or "scope adjudication", is irrelevant since the absence of "scope" status precludes federal representation.

(3) Notwithstanding the aforementioned, BARBARA L. HERWIG ["Herwig"] has been representing in tort litigation before Judge Arnold, at federal cost and expense, those who have not been "scope certified" or "scope adjudicated".

(4) In short, before Judge Arnold, Herwig, and those who she purports to represent, are defrauding the federal treasury -- a fact which they have not denied.

(5) Such fraud on the federal treasury is intentional, egregious, criminal and of grand jury concern.

8a. The lawful limits of the authority of Herwig is contained in 28 U.S.C. §547, and it reads as follows:

> "Except as otherwise provided by law, each United States attorney, within his district, shall--- (1) prosecute for all offenses against the United States; (2) prosecute or defend, for the Government, all civil actions, suits or proceedings in which the United States is concerned; (3) appear in behalf of the defendants in all civil actions, suits or proceedings pending in his district against collectors,

> or other officers of the revenue or customs for any act done by them or for the recover of any money exacted by or paid to these officers, and by them paid into the Treasury; (4) institute and prosecute proceedings for the collection of fines, penalties, and forfeitures incurred for violation of any revenue law, unless satisfied on investigation that justice does not require the proceedings; and (5) to make such reports as the Attorney General may direct."

b. A "scope certification" or "scope adjudication" triggers a UNITED STATES OF AMERICA ["USA"] substitution as the tort defendant (28 U.S.C. §2679[d]), and thereby authorizes 28 U.S.C. §547 representation by the Attorney General's Office.

c. Absent the USA substitution as the defendant, there is no statutory authorization for federal attorneys to represent tort defendants in their individual names.

d. Herwig was usurping her legal authority as she and her clients were defrauding the American government and taxpayer in litigation before Judge Arnold.

9a. The reason for the lack of a scope certification is clearly not inadvertent since Herwig, as reflected by the decisions in the Federal Reporter, is the Department of Justice authority on the subject and her name often appears on the reported cases (e.g., Melo v. Hafer, 912 F.2d 628, 640 n. 17 [3rd Cir.-1990], cert. granted U.S. , 111 S.Ct. 1070 [1991]).

b. Some of the purported clients of Herwig are directly engaged in egregious criminal racketeering activities, including the diversion of monies payable "to the federal court" to the private pockets of their cronies, as Judge Arnold knows.

c(1) Obviously, neither the Attorney General nor any one of his designees desire to execute a "scope certification" nor have any court adjudicate such issue.

(2) Although Herwig cannot find anyone who is willing to execute a "scope certificate", they nevertheless represent these perfidious officials, at federal cost and expense, before Judge Arnold and others.

d. The obligation of Herwig, as well as Judge Arnold, is to recover such criminally diverted monies on behalf of the federal government, not defend these perfidious judges and officials.

e(1) The clients of Herwig have federal representation, at federal cost and expense, because they have the "clout" of their official position.

(2) "Clout" does not determine eligibility for a federal defense, as the recent case of <u>Johnson v. Carter</u> (939 F.2d 180 [4th Cir.-1991]) reveals.

(3) In such case, in which Herwig was one of the attorneys, "scope status" was denied to the Commander-in-Chief of the U.S. Atlantic Fleet when he abused a civilian law enforcement officer.

10a. Those, such as petitioner, who desire to have no part in judicial or prosecutorial corruption, are compelled to endure a "reign of terror", at government expense.

b. As revealed by petitioner's letter to Hon. WILLIAM S. SESSIONS ["Sessions"], Director of the <u>FEDERAL BUREAU OF</u>

INVESTIGATION ["F.B.I."] of October 15, 1991 (Exhibit "A"), petitioner has opposed and exposed a criminal racket operating within the judicial system.

c(1) In order to have "approved" a non-existent and 'phantom' "accounting" by a court-appointed receiver and his discharge and the discharge of his surety, petitioner was incarcerated for two months, without bail, at great federal expense, most of that time at the FEDERAL MEDICAL CENTER ["FMC"] at Rochester, Minnesota -- "The American Gulag" -- in the Eighth Circuit.

(2) There is no accounting, final or otherwise, "the criminals with law degrees" and their judicial patrons took all the assets of PUCCINI CLOTHES, LTD. ["Puccini"] -- "the judicial fortune cookie" -- leaving nothing for the legitimate creditors.

(3) Where federal prison facilities in this circuit are employed to facilitate a fraud upon the public, the grand jury right to know about the event, and similar events, and a "duty" to inquire.

11a. Petitioner will demonstrate, clearly and conclusively to the Grand Jury, that the decision of Judge Arnold, in Sassower v. Carlson, 930 F.2d 583 [8th Cir.-1991]) was the product of fraud and corruption, extrinsic and otherwise, substantively and procedurally, and of a criminal magnitude (Ex parte Virginia, 100 U.S. 339 [1880]).

b. Although, corrupt judges and officials in other circuits were represented before Judge Arnold, Judge Arnold was communicated with, directly and/or indirectly, by them, ex parte.

c. Such corrupt activities, were to advance a criminal racketeering adventure, involving the larceny of judicial trust assets, extortion and other racketeering crimes.

d. This criminal adventure is doomed to failure, and if such failure does not come sooner, it will come later.

12. As will be more fully demonstrated in another proceeding, this racketeering adventure has been advanced through the vehicle of published "injurious falsehoods", to which Judge Arnold has now become a contributor.

13. Most of petitioner's evidence has been confirmed by responsible media representatives and this criminal racket, quantum leap more extensive and more egregious than Chicago's "Greylord" and has no chance of success.

WHEREFORE, it is respectfully prayed that this petition be granted in all respects.

Dated: October 30, 1991

GEORGE SASSOWER [GS-0521]
Petitioner, pro se
16 Lake Street,
White Plains, N.Y. 10603
914-949-2169

GEORGE SASSOWER
16 LAKE STREET
WHITE PLAINS, N.Y. 10603
914-949-2169

October 15, 1991

Hon. William S. Sessions
Director, Federal Bureau of Investigation
J. Edgar Hoover Bldg.
9th Street & Pennsylvania Avenue,
Washington, D.C. 20535

Honorable Sir:

1. Enclosed please find a copy of an Order dated July 24, 1989 which purports to "approve" the "accounting" of Lee Feltman, Esq., the court-appointed receiver, of Puccini Clothes, Ltd.

There is no accounting for Puccini filed as part of this Order. Nor is there an accounting filed for Puccini as part of any other order since that corporation was involuntarily dissolved on June 4, 1980.

All Puccini's judicial trust assets were made the subject of larceny and unlawful plundering by Kreindler & Relkin, P.C., Feltman, Karesh, Major & Farbman, Esqs., and their co-conspirators--leaving nothing for its nationwide creditors.

2. As part of this criminal scheme, monies payable "to the federal court" under Docket No. 0305 Civ. 1984 in the United States District Court for the Eastern District of New York were diverted to the private pockets of Kreindler & Relkin, P.C. and its client.

3. To compel Hyman Raffe, a creditor of Puccini, to succumb to such scheme and remain silent, he was convicted of <u>non</u>-summary criminal contempt--without a trial, without an opportunity of a trial and without live testimony. He was threatened with incarceration for seven years and forced to make "pay-offs" and to give other unlawful considerations.

As independently investigated and reported by Mr. Jonathan Ferziger of United Press International:

> "By signing three extraordinary agreements in 1985, however, Raffe agreed ... . In exchange, the court agreed to let him go free. The tab so far has come to more than $2.5 million, paid to both the Feltman and Kreindler firms. Raffe continues to pay with checks from his A.R. Fuels Co. business."

Exhibit "A"

These extorted monies also are the property of the sovereign (Gompers v. Buck's Stove, 221 U.S. 418, 447 [1911]; Goodman v. State, 31 N.Y.2d 381, 340 N.Y.S.2d 393, 292 N.E.2d 665 [1972]).

4. The above-described criminal racketeering activities, whose focus herein is limited to only some of its monetary aspects--are more extensive and egregious than set forth.

5. "Hard core" judicial involvement in this criminal racket is documentable--and lies with Chief U.S. Circuit Court Judge James L. Oakes of the Second Circuit; Chief U.S. District Court Charles L. Brieant, and Presiding Justice Francis T. Murphy of the Appellate Division, First Judicial Department of New York.

Judicial corruption in the Puccini matter has extended itself as far west as the States of California and Washington and as far south as the State of Virginia.

6. The foregoing is fully verifiable by documentary evidence. I assure you of my fullest cooperation in your investigation of this matter.

Most Respectfully,

GEORGE SASSOWER

Enclosure

Certified Mail #P858 061 847
R.R.R.

JS 44
(Rev. 07/86)

CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I (a) PLAINTIFFS	DEFENDANTS
George Sassower	Charles A. Banks
(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF West, N.Y. (EXCEPT IN U.S. PLAINTIFF CASES)	COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT ______ (IN U.S. PLAINTIFF CASES ONLY) NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED
(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER) GEORGE SASSOWER pro se. 16 Lake Street White Plains, NY 10603-3852 914-949-2169	ATTORNEYS (IF KNOWN) ?

II. BASIS OF JURISDICTION (PLACE AN x IN ONE BOX ONLY)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN x IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) (For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated or Principal Place of Business in This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated and Principal Place of Business in Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

18 USC § 3332

V. NATURE OF SUIT (PLACE AN x IN ONE BOX ONLY)

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excl. Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury

PERSONAL INJURY
- ☐ 362 Personal Injury — Med Malpractice
- ☐ 365 Personal Injury — Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

CIVIL RIGHTS
- ☐ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/ Accommodations
- ☐ 444 Welfare
- ☐ 440 Other Civil Rights

PRISONER PETITIONS
- ☐ 510 Motions to Vacate Sentence
- ☐ 530 Habeas Corpus
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights

FORFEITURE /PENALTY
- ☐ 610 Agriculture
- ☐ 620 Food & Drug
- ☐ 630 Liquor Laws
- ☐ 640 R.R. & Truck
- ☐ 650 Airline Regs
- ☐ 660 Occupational Safety/Health
- ☐ 690 Other

LABOR
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Mgmt. Relations
- ☐ 730 Labor/Mgmt. Reporting & Disclosure Act
- ☐ 740 Railway Labor Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Empl. Ret. Inc. Security Act

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

PROPERTY RIGHTS
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 840 Trademark

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC (405(g))
- ☐ 863 DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS — Third Party 26 USC 7609

OTHER STATUTES
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce/ICC Rates/etc.
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 810 Selective Service
- ☐ 850 Securities/Commodities/ Exchange
- ☐ 875 Customer Challenge 12 USC 3410
- ☐ 891 Agricultural Acts
- ☐ 892 Economic Stabilization Act
- ☐ 893 Environmental Matters
- ☐ 894 Energy Allocation Act
- ☐ 895 Freedom of Information Act
- ☐ 900 Appeal of Fee Determination Under Equal Access to Justice
- ☐ 950 Constitutionality of State Statutes
- ☒ 890 Other Statutory Actions

VI. ORIGIN (PLACE AN x IN ONE BOX ONLY)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judgment

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION ☐ UNDER F.R.C.P. 23

DEMAND $ None

Check YES only if demanded in complaint: JURY DEMAND: ☐ YES ☒ NO

VIII. RELATED CASE(S) (See instructions): IF ANY

No.

JUDGE ______ DOCKET NUMBER ______

DATE Oct. 30, 1991

SIGNATURE OF ATTORNEY OF RECORD

George Sassower
16 Lake Street
White Plains, NY 10603-3852

UNITED STATES DISTRICT COURT

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS

In the Matter of a Grand Jury Application by
GEORGE SASSOWER,
Petitioner,
-against-
U.S. Attorney CHARLES A. BANKS,
Respondent.

Docket No.

28 U.S.C. §1915 Application

This affirmation is made in support of affirmant's assertion that this Court is judicially estopped from any 28 U.S.C. §1915 analysis of his papers, alternatively for §1915 relief.

1a. Since affirmant's assets, including those contractually based, have been unconstitutionally frozen (U.S. Constitution, Article 1 §10[1]; Amendment V), for, inter alia, unconstitutional First Amendment reasons, affirmant claims that the courts are judicially estopped from making any 28 U.S.C. §1915 analysis of his papers or denying the relief herein.

b. The annexed affirmation (Exhibit "A") confirms that affirmant does not have the liquid funds to pay the necessary fees.

c. Affirmant's petition has irresistible compelling merit, and mandated by statute, professional and societal obligation (e.g., 18 U.S.C. §4).

2. Affirmant declares under penalty of perjury that the aforementioned is true and correct.

WHEREFORE, it is respectfully prayed the foregoing application be granted in all respects.

Dated: October 30, 1991

GEORGE SASSOWER [GS-0512]
Plaintiff, pro se.
16 Lake Street,
White Plains, N.Y. 10603
914-949-2169

DECLARATION IN SUPPORT OF REQUEST TO PROCEED IN FORMA PAUPERIS

UNITED STATES DISTRICT COURT
~~SOUTHERN~~ ~~DISTRICT~~ OF ~~NEW YORK~~
EASTERN. ARKANSAS

George Sassower
(Petitioner/Plaintiff

-vs-

Charles A. Banks

(Respondent(s)/Defendant(s)

I, George Sassower am the petitioner/plaintiff in the above entitled case. In support of my motion to proceed without being required to prepay fees or costs or give security therefor, I state that because of my poverty I am unable to pay the costs of said proceeding or to give security therefor; that I believe I am entitled to redress.

I declare that the reponses which I have made below are true.

1. If you are presently employed, state the amount of your salary or wages per month, and give the name and address of your employer. YOU MUST ANSWER THIS QUESTION EVEN IF YOU ARE IN PRISON.

No.

2. If you are NOT PRESENTLY EMPLOYED, state the date of last employment and amount of the salary per month which you received and how long the employment lasted. YOU MUST ANSWER THIS QUESTION EVEN IF YOU ARE IN PRISON. IF YOU HAVE NEVER BEEN EMPLOYED, SAY SO.

Oct 1988 - $500 -

3. Have you received, within the past twelve months, any money from any of the following sources?

a. Business, profession, or form of self-employment? YES__ NO X

b. Rent payments, interest, or dividends? YES__ NO X

c. Pensions, annuities, or life insurance? YES__ NO X

d. Gifts or inheritances? YES__ NO X

e. Any form of public assistance? YES__ NO X

f. Any other sources? YES X NO__

Exhibit "A"

If the answer to any questions in part three is yes, describe each source of money and state the amount received from each during the past twelve months.

$ 4,200/yr. Social Security.

Do you own any cash or do you have money in a checking or savings account?

Yes X . No___ (Include any funds in prison accounts)

If the answer is yes, state the total value owned.

About $20

Do you own any real estate, stocks, bonds, notes, automobiles, or other valuable property (excluding ordinary household furnishings and clothes)?

YES X . NO___

If the answer is yes, describe the property and state its approximate value.

All unconstitutionally frozen - see afm.

List the persons who are dependant upon you for support; state your relationship to those persons; and indicate how much you contribute toward their support at the present time.

Lizbeth A. Sassower - daughter CANNOT SUPPORT

If you live in a rented apartment or other rented housing, state how much you pay each month for rent. Do not include rent contributed by other people.

0

State any special financial circumstances which the court should consider in this application.

Judiciary estopped from §1915 analysis

I understand that a false statement or answer to any questions in this declaration will subject me to penalties for perjury.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 30 day of Oct 1991.

(Signature)

GEORGE SASSOWER
16 Lake Street
White Plains, NY 10603-3852