



**OFFICE OF THE ALBANY COUNTY DISTRICT ATTORNEY
PUBLIC INTEGRITY UNIT**

Albany County Judicial Center
Albany, New York 12207
Fax Number (518) 487-5093

COMPLAINT FORM

PLEASE TYPE OR PRINT CLEARLY IN DARK INK.
COMPLETE THE ENTIRE FORM AND SIGN.
RETURN/SEND FORM TO THE PUBLIC INTERGRITY UNIT.

YOUR CONTACT INFORMATION

Your name: Elena Sassower Home Phone: 646-220-7987
Street Address: Box 8101 Business Phone: 914-421-1200
City/Town: Inter Plains State: NY Zip: 10603 County: Westchester

YOUR COMPLAINT

Public Agency/Individual you are complaining about: all public officers + their collaborators who were the suspect of
Street Address (if known): _____
City/Town: _____ State: _____ Zip: _____ County: _____
Has this matter been submitted to another agency? Yes No
If so, which agency? Commission to Investigate January 7, 2014
Is there any legal action pending? Yes No
If so, where and what? Public sample + June 21, 2016
2nd citizen taxpayer action
Appellate Division, 3rd Dept complaints

PLEASE BRIEFLY DESCRIBE YOUR COMPLAINT BELOW
(use back of form or attach additional documentation if necessary)

Grand jury of the Public Use + other corrupt acts. See accompanying March 6, 2018 letter

plus additionally the judges who corrupted the judicial process in CJA's 2 citizen-taxpayer actions, together with the Attorney General + his corrupt attorney staff

READ THE FOLLOWING BEFORE SIGNING BELOW:
I understand that any false statements made in this complaint are punishable as a Class A Misdemeanor under Section 175.30 and/or Section 210.45 of the Penal Law.

Signature: Elena Sassower Date: March 6, 2018

Return to: **OFFICE OF THE ALBANY COUNTY DISTRICT ATTORNEY
PUBLIC INTEGRITY UNIT**

Albany County Judicial Center, 6 Lodge St 4th Floor, Albany, New York 12207
Fax Number (518) 487-5093

Received by: _____ Date: _____

CENTER for JUDICIAL ACCOUNTABILITY, INC.

Post Office Box 8101
White Plains, New York 10602

Tel. (914)421-1200

E-Mail: mail@judgewatch.org
Website: www.judgewatch.org

March 6, 2018

Albany County District Attorney P. David Soares
Albany County Judicial Center
6 Lodge Street, 4th Floor
Albany, New York 12207

RE: SEEKING ENFORCEMENT OF "THE PUBLIC TRUST ACT" –
Penal Law §496, "corrupting the government"

- (1) New corruption complaint or, alternatively, third supplement to CJA's July 19, 2013 corruption complaint;
- (2) Request for intervention on the appeal of the fraudulent November 28, 2017 decision and judgment in CJA's second citizen-taxpayer action (*CJA v. Cuomo, et al*, Albany Co. #5122-2016) & other steps to secure its vacatur;
- (3) Request for appointment of a special prosecutor

Dear District Attorney Soares:

This follows our face-to-face conversation together on January 30, 2018, immediately upon the conclusion of your testimony at the Legislature's budget hearing on "public protection". The facts pertaining to that conversation are recited by my accompanying conflict-of-interest/misconduct complaint against you to the Attorney Grievance Committee for the Third Judicial Department, incorporated herein by reference.

The purpose of this letter is to initiate, for your investigation and prosecution, a new corruption complaint against all the public officers you have "protected" by "sitting on" CJA's July 19, 2013, January 7, 2014, and June 21, 2016 corruption complaints against them. This fourth complaint – or third supplement to the July 19, 2013 corruption complaint – seeks enforcement of "The Public Trust Act", enacted in 2014 and codified as Penal Law §496, "corrupting the government", which pertains to larceny of public monies and a scheme to fraud with respect thereto. It rests on:

- (1) the particulars of larceny and fraud set forth by my written statement in support of my testimony at the Legislature's January 30, 2018 budget hearing on "public protection" – a copy of which I gave you, in hand, when we spoke (Exhibit A);
- (2) the particulars of larceny and fraud set forth by my written statement in support of my testimony at the Legislature's February 5, 2018 budget hearing on "local government officials/general government" (Exhibit B);

(3) the VIDEO of the Legislature's January 30, 2018 budget hearing, at which I demonstrated, by my oral testimony, that the Judiciary's budget was deceitful and defied comprehension and that the Legislature's hearing thereon and by its first witness – Chief Administrative Judge Lawrence Marks -- was "a charade";

(4) the VIDEO of the Legislature's February 5, 2018 budget hearing, at which, after particularizing hundreds of millions of dollars of larceny and fraud in the Governor's Legislative/Judiciary budget bill for fiscal year 2018-2019 – including pertaining to the judicial salary increases resulting from the August 29, 2011 report of the Commission on Judicial Compensation and the December 24, 2015 report of the Commission on Legislative, Judicial and Executive Compensation – I stated: "These are penal law violations";

(5) the particulars of larceny and fraud set forth by my written statement in support of my testimony at the February 2, 2018 local forum on the state budget, sponsored by Westchester's Assembly Delegation (Exhibit C);

(6) the VIDEO of my testimony on February 2, 2018 before seven members of Westchester's Assembly Delegation, including the chair of the Assembly Committee on Oversight, Analysis, and Investigation – Assemblywoman Shelly Mayer.

These written statements and my oral testimony also highlight that Attorney General Schneiderman, in tandem with judges, corrupted the judicial process in CJA's two citizen-taxpayer actions pertaining to the budget. This must be a priority for your "Public Trust Act" investigation and prosecution – and I so request.

Additionally, I request your assistance in vacating the corrupt judicial decisions that have stolen the public's rights, in addition to its money – starting with the fraudulent November 28, 2017 decision and judgement in the second citizen-taxpayer action – the particulars of which are recited by the analysis thereof attached to CJA's January 10, 2018 notice of appeal (Exhibit D). This would include your intervention, on CJA's behalf, in the appeal.

In that connection, I would remind you of my words at the outset of our only previous face-to-face interaction – on September 19, 2013, when I was testifying before you and your fellow members of the Commission to Investigate Public Corruption at your public hearing in Manhattan. I stated:

"Cases are perfect paper trails. There's a record. So, it's easy to document judicial corruption".

This is what I was beginning to repeat, at the January 30, 2018 budget hearing, before being cut off by Senate Finance Committee Ranking Member Liz Krueger. I intended to add that it is also easy to document attorney corruption: the case record being a paper trail of that, as well.

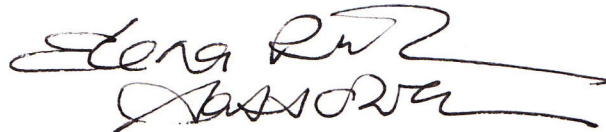
The record of CJA's citizen-taxpayer actions is the ultimate "perfect paper trail" as it contains CJA's detailed analyses of both the Attorney General's litigation fraud and the fraudulent judicial decisions. And, making it all even easier, these analyses are inventoried by the disciplinary complaints and supplements thereto that I filed with the Commission on Judicial Conduct against Acting Albany Supreme Court Judge Denise Hartman and with the Attorney Grievance Committees against Attorney General Schneiderman and his collusive staff.

As with CJA's three corruption complaints that you have been "sitting on", the EVIDENCE substantiating this fourth corruption complaint is *readily-verifiable* and accessible from CJA's website, www.judgewatch.org. Under the prominent homepage link "Outing Corrupt & Collusive Incumbents & Ending their Road to Re-Election & Higher Office – with EVIDENCE" is a link for the "2018 Legislative Session". It brings up a menu page with pertinent links, including for this letter.

I take this opportunity to note that last year, in the "2017 Legislative Session", I also testified, at the Legislature's budget hearing on "local government officials/general government", which was on January 30, 2017, and at the Legislature's budget hearing on "public protection", which was on January 31, 2017. The VIDEO of my testimony at the January 30, 2017 budget hearing will especially interest you as most of my recitation of the Legislature's nonfeasance was devoted to its failure to oversee the performance of the district attorneys, their salaries, and the budget item pertaining to district attorney salary reimbursement. For your convenience, the VIDEOS of both those 2017 budget hearings are accessible from CJA's webpage for this letter – and you will find there, as well, the VIDEO of my testimony before you at the September 19, 2013 hearing of the Commission to Investigate Public Corruption – and a photo of our face-to-face conversation on January 30, 2018, as you were leaving the Legislature's hearing room.

As it is never too late to do the right thing – and doing the right thing is your obligation to do – I request that you take all necessary steps to secure an independent prosecutor, absent your demonstrating how this fourth complaint, so directly involving your financial and other interests and exposing the mountain of criminality you've been "sitting on" since July 19, 2013, can otherwise be properly handled.

Thank you.

A handwritten signature in black ink, appearing to read "Steven R. Soares". The signature is written in a cursive, somewhat stylized font with a long horizontal flourish extending to the right.

Enclosure: CJA's March 6, 2018 conflict-of-interest/misconduct complaint
to the Attorney Grievance Committee for the Third Judicial Department

cc: Attorney Grievance Committee for the Third Judicial Department