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April 30, 2025

TO: New York State Commission on Judicial Conduct

FROM: Elena Sassower, Director
Center for Judicial Accountability, Inc. (CJA)

RE: Conflict-of-Interest/Corruption Complaint vs Rensselaer County Court Judge Jennifer Sober & Ulster County Surrogate Court Judge Sara McGinty for “wilful misconduct in office” in *Center for Judicial Accountability, et al. v. Commission on Legislative, Judicial & Executive Compensation... Wilson, Zayas, et al. (Albany Co. #902654-24)* to financially benefit themselves and protect from accountability the corrupt judicial, executive and legislative respondents with whom they have relationships and dependencies.

THE COMPLAINT

Pursuant to [Article VI, §22 of the New York State Constitution](#) and [Judiciary Law §44.1](#), I file this facially-meritorious, fully-documented conflict-of-interest/corruption complaint against Rensselaer County Court Judge Jennifer Sober and Ulster County Surrogate Court Judge Sara McGinty, whose “wilful misconduct in office”¹ in *Center for Judicial Accountability, et al. v. Commission on Legislative, Judicial & Executive Compensation... Wilson, Zayas, et al. (Albany Co. #902654-24)*, obliterating the “administration of justice”, “rule of law”, and ALL adjudicative standards, was intended to—and did – financially benefit themselves and protect from accountability the corrupt judicial, executive, and legislative respondents with whom they have relationships and dependencies.

This is particularized by CJA’s “legal autopsy”/analyses of their fraudulent decisions “throwing” the case:

- [CJA’s 27-page “legal autopsy”/analysis of Judge Sober’s three August 14, 2024 “Decision\(s\), Order\(s\) and Judgment\(s\)”](#), whose pages 6-7 identify her financial interest in the subject matter of the lawsuit: a \$101,300 salary interest, plus “more than half a million dollars” in claw-back liabilities as of April 14, 2024 – with the details furnished by a link to an [accompanying affirmation](#) (at ¶¶6-9) in support of [CJA’s September 12, 2024 motion for renewal/reargument/vacatur/transfer](#);

- [CJA's 26-page "legal autopsy"/analysis of Judge McGinty's November 13, 2024 "Decision/Order/Judgment" denying the September 12, 2024 motion](#), whose pages 11 – 14 detail Judge McGinty's financial interest in the subject matter of the lawsuit: a \$101,300 salary interest, plus claw-back liabilities of approximately \$625,412 as of November 13, 2024 – AND, because her husband is an Ulster County Family Court judge, her additional \$94,100 salary interest and additional approximate \$749,112 claw-back liabilities, as of November 13, 2024, as to him.

As detailed by the "legal autopsy"/analyses, such financial and other interests not only mandated that Judges Sober and McGinty disqualify themselves pursuant to [§100.3E of the Chief Administrator's Rules Governing Judicial Conduct](#), but divested them of jurisdiction pursuant to [Judiciary Law §14](#), including to invoke the judge-made "rule of necessity". Yet both concealed same and their duty of disclosure pursuant to §100.3F of the Chief Administrator's Rules, thereupon manifesting their pervasive actual bias by their decisions, concealing ALL the facts, law, and legal argument CJA presented, dispositive of its entitlement to the relief sought, and countenancing and rewarding the litigation fraud of respondent Attorney General Letitia James, representing herself and her fellow respondents.

As stated 121 years ago by the Appellate Division, First Department in [Matter of Bolte](#), 97 AD 499 (1st Dept. 1904):²

"A judicial officer may not be removed for merely making an erroneous decision or ruling, but he may be removed for willfully making a wrong decision or an erroneous ruling, or for a reckless exercise of his judicial functions without regard to the rights of litigants, or for manifesting friendship or favoritism toward one party or his attorney to the prejudice of another..." (at 507, underlining added).

"...Favoritism in the performance of judicial duties constitutes corruption as disastrous in its consequence as if the judicial officer received and was moved by a bribe." (at 512).

Five years later, the Appellate Division, First Department stated even more forcefully in [Matter of Droege](#), 129 AD 866 (1909):

"A single decision or judicial action, correct or not, which is established to have been based on improper motives and not upon a desire to do justice or to properly perform the duties of his office, will justify a removal..." (at 882, underlining added).

² Cited to, more than a quarter of a century ago, by the Commission's then administrator and counsel, Gerald Stern, in his August 20, 1998 [New York Law Journal](#) column, "*Judicial Independence is Alive and Well*".

As proven by the “legal autopsy”/analyses, there is nothing “correct” or “merely...erroneous” about Judge Sober’s three August 14, 2024 decisions or about Judge McGinty’s November 13, 2024 decision. Rather, from beginning to end, each is a calculated judicial fraud and criminal act, for which the Commission’s duty is to secure the removal of both judges from the bench – and concurrently to refer them to criminal authorities for prosecution of their flagrant penal law violations, for which they will be convicted and from which their automatic disbarments can be obtained.

Although your rules do not require complainants to swear to the truth of their judicial misconduct complaints, I affirm the foregoing to be true under penalties of perjury, pursuant to CPLR §2016.

Thank you.

A handwritten signature in blue ink, appearing to read "Steven R. Zuckerman". The signature is fluid and cursive, with the first name "Steven" and last name "Zuckerman" clearly distinguishable.