

Complaint Form



Commission on
Prosecutorial Conduct

Fill out the required fields to file a complaint with the New York State Commission on Prosecutorial Conduct. Please provide accurate contact information so that the Commission can contact you if needed.

SECTION I

Contact information:

Title *(required) ☐ Mr. ☒ Ms. ☐ Mx.

First Name *(required)

Elena

Last Name *(required)

Sassower

Email Address *(required)

elena@judgewatch.org

Phone Number *(required)

914-421-1200

Street Address

10 Stewart Place, Apt. 2D-E

City

White Plains

State

New York

Zip

10603

Have you submitted a complaint before? *(required)

☒ Yes ☐ No

If yes, what is your case file no.?

11/18/24 complaint (##34-95), 3/21/25 complaint

Additional evidence for a previously submitted complaint can be sent via email to: complaints@cpc.ny.gov with your case file number, or mailed to our office at the address below:

NYS Commission on Prosecutorial Conduct

39 Broadway, Suite 720

New York, NY 10006

Does this complaint relate to the conduct of a district attorney or assistant district attorney in New York State? *(required)

☒ Yes ☐ No

*If this complaint does not relate to a NYS DA or ADA, the complaint will be dismissed.
The Commission cannot assist with complaints outside of its jurisdiction.*

Complaint Information:**Prosecutor's name (must be a NYS district attorney or assistant DA) *(required)**

see attached (at pp. 3-4)

Are there other prosecutors associated with this complaint? If so, please include their name(s).

District Attorneys Association of the State of New York (DAASNY)

Prosecutor's County *(required)

- | | | |
|--|--|--|
| ☒ Albany County | ☒ Herkimer County | ☒ Richmond County (<i>Staten Island</i>) |
| ☒ Allegany County | ☒ Jefferson County | ☒ Rockland County |
| ☒ Bronx County | ☒ Kings County (<i>Brooklyn</i>) | ☒ Saint Lawrence County |
| ☒ Broome County | ☒ Lewis County | ☒ Saratoga County |
| ☒ Cattaraugus County | ☒ Livingston County | ☒ Schenectady County |
| ☒ Cayuga County | ☒ Madison County | ☒ Schoharie County |
| ☒ Chautauqua County | ☒ Monroe County | ☒ Schuyler County |
| ☒ Chemung County | ☒ Montgomery County | ☒ Seneca County |
| ☒ Chenango County | ☒ Nassau County | ☒ Steuben County |
| ☒ Clinton County | ☒ New York County (<i>Manhattan</i>) | ☒ Suffolk County |
| ☒ Columbia County | ☒ Niagara County | ☒ Sullivan County |
| ☒ Cortland County | ☒ Oneida County | ☒ Tioga County |
| ☒ Delaware County | ☒ Onondaga County | ☒ Tompkins County |
| ☒ Dutchess County | ☒ Ontario County | ☒ Ulster County |
| ☒ Erie County | ☒ Orange County | ☒ Warren County |
| ☒ Essex County | ☒ Orleans County | ☒ Washington County |
| ☒ Franklin County | ☒ Oswego County | ☒ Wayne County |
| ☒ Fulton County | ☒ Otsego County | ☒ Westchester County |
| ☒ Genesee County | ☒ Putnam County | ☒ Wyoming County |
| ☒ Greene County | ☒ Queens County | ☒ Yates County |
| ☒ Hamilton County | ☒ Rensselaer County | |

SECTION II

Does the alleged misconduct relate to a criminal case? If no, please skip to Section III, "Summary of Complaint" section. *(required)

☐ Yes ☒ No

Are you the defendant in this matter? *(required)

☐ Yes ☒ No

If you are not the defendant, state your relationship to them or the matter.

What is the date(s) of the alleged crime(s)? *(required)

____/____/____	____/____/____	____/____/____	____/____/____
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What is the date of arrest?

What date was the defendant first brought before a judge?
Alternatively, what is the date of the indictment?

What are the charges? *(required)

What is the case number? *(required)

Is this case still pending? If no, please skip to "What was the outcome?" *(required)

☐ Yes ☒ No

Is the trial scheduled?*(required)

☐ Yes ☒ No

What is the date? (mm/dd/yy) *(required)

When is the next court appearance? (mm/dd/yy) *(required)

What was the outcome? *(required)

☐ Found guilty after trial ☐ Found not guilty after trial ☐ Guilty Plea ☐ Dismissed

Is there an appeal pending? *(required)

☐ Yes ☐ No

Is there any other case related litigation (e.g. civil lawsuit)? *(required)

☐ Yes ☐ No

Do you/did you have an attorney in this matter? *(required)

☐ Yes ☐ No

If yes, please provide Attorney information:

First Name *(required)

Last Name *(required)

Email Address

Phone Number

Street Address

City

State

Zip

If you have a second attorney, please provide their information:

First Name*(required)

Last Name*(required)

Email Address

Phone Number

Street Address

City

State

Zip

SECTION III

Summary of Complaint: *(required)

Please describe the alleged misconduct in as much detail as possible. Failure to provide sufficient facts can lead to your complaint being dismissed. Summaries of complaints should include:

- What specifically happened (what conduct did the prosecutor engage in or fail to do)
- When the alleged misconduct happened
- Any individuals who have personal knowledge of what occurred (e.g., attorneys, co-defendants, witnesses, law enforcement, etc.)

The summary of the complaint may also be submitted as an attachment. If you would like to include a copy of a motion submitted to a court, you must still provide a summary of the complaint. Witnesses, law enforcement, etc.)

See attached

SECTION IV

Have you reported the alleged misconduct to an Attorney Grievance Committee? If no, please skip to "Have you reported the alleged misconduct to any other State agency?" *(required)

☒ Yes ☐ No

What is the date of reporting? (mm/dd/yy) *(required)

10/14/16 / ____

Did you receive a response? *(required)

☒ Yes ☐ No

What was the response? *(required)

see attached (at p. 2), with hyperlinks to the October 14, 2016 complaint to the Attorney Grievance Committees of all 4 judicial departments & dismissal letters, etc.

Have you reported the alleged misconduct to any other State agency? *(required)

☒ Yes ☐ No

What is the date of reporting? (mm/dd/yy) *(required)

07/19/13 / ____

Did you receive a response? *(required)

☒ Yes ☐ No

What was the response? *(required)

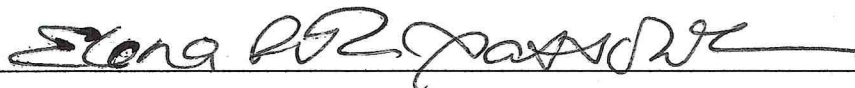
see attached (at pp. 2-3), with hyperlinks to the July 19, 2013 complaint to the Commission to Investigate Public Corruption and its dismissal letter, etc.

SECTION V

Please provide any materials that are relevant to your complaint and submit with the completed form.

Judiciary Law 499-f requires that complaints be signed and in writing.*

Signature: _____



Date (mm/dd/yy): 08/04/26 / ____

Mail to:

NYS Commission on Prosecutorial Conduct
39 Broadway, Suite 720
New York, NY 10006

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

August 4, 2026

TO: New York State Commission on Prosecutorial Conduct

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

RE: Complaint against New York State's 62 District Attorneys for public corruption, born of conflicts of interest pertaining to their D.A. salaries & their relationships with state executive, legislative, and judicial officers within their geographic jurisdictions, whose flagrant violations of penal laws the D.A.s are NOT investigating and prosecuting by reason thereof

Pursuant to [Judiciary Law Article 15-A](#) and, specifically, its [§499-f\(1\)](#), CJA files this facially-meritorious, fully-documented, signed, and attested-to-be-true complaint against New York's 62 district attorneys for willfully violating the duties of their office to enrich themselves by D.A. salary increases they know to be the product of "false instrument" commission reports – and, in furtherance thereof, for "protecting" from investigation and grand jury indictment the high-ranking public officers within their geographic jurisdictions who are beneficiaries of the same or comparable "false instrument" commission/committee reports and/or complicit therein, in flagrant violation of penal laws including:

[Penal Law §175.35](#): "Offering a false instrument for filing in the first degree";
[Penal Law §195.20](#): "Defrauding the government";
[Penal Law §190.65](#): "Scheme to defraud in the first degree";
[Penal Law §496.05 \("Public Trust Act"\)](#): "Corrupting the government in the first degree";
[Penal Law §496.06 \("Public Trust Act"\)](#): "Public corruption";
[Penal Law §155.42](#): "Grand larceny in the first degree";
[Penal Law §460.20](#): "Enterprise corruption";
[Penal Law §195](#): "Official misconduct";
[Penal Law §105.15](#): "Conspiracy in the second degree";
[Penal Law §20.00](#): "Criminal liability for conduct of another".

This warrants the governor removing the D.A.s from office, pursuant to [Article XIII, §13\(b\) of the New York State Constitution](#), which this Commission is empowered to effectuate – and their disbarment as attorneys by New York's Attorney Grievance Committees, to which this Commission is empowered to make referral with respect to their violations of [New York's Code of Professional Conduct](#), proscribing, *inter alia*, conflicts of interest, such as embodied in the [National Prosecution Standards of the National District Attorneys Association](#) (§1-3.3(d) "Specific Conflicts", §1-3.4 "Special Prosecutors", §1-3.5 "Handling Conflicts"), and requiring reporting of attorney misconduct "to a tribunal or other authority empowered to investigate or act upon such violation" (NY Code of Professional Conduct, §8.3).

The facts and evidence substantiating this complaint – and CJA’s [November 18, 2024](#) and [March 21, 2025](#) complaints that preceded it, based, respectively, on [CJA’s July 18, 2024 NOTICE & grand jury/public corruption complaint](#) and [March 3, 2025 grand jury/public corruption complaint](#) – are furnished by [CJA’s April 14, 2026 FURTHER NOTICE & grand jury/public corruption complaint](#) to all 62 D.A.s and to their organizational entity, the [District Attorneys Association of the State of New York \(DAASNY\)](#), entitled:

“FURTHER NOTICE & GRAND JURY/PUBLIC CORRUPTION COMPLAINT:
Your April 1, 2026 2% D.A. salary increases, the ‘false instrument’ December 4, 2023 Report on which they are based, and other grand larcenies of the public fisc and violations of penal laws by NYS’ highest public officers for inquiry by grand juries pursuant to Article I, §6 of the NYS Constitution – and, specifically, pertaining to the FY2026-27 state budget”.

The Commission is already familiar with this [April 14, 2026 FURTHER NOTICE & grand jury/public corruption complaint](#), as the Commission was cc’d on it and was sent it by the [same e-mail](#) as transmitted it to the 62 D.A.s. The pertinent paragraph to the D.A.s pertaining thereto read:

“To assist you in belatedly acknowledging your HUGE and direct financial and other interests, mandating your securing a special prosecutor for the July 18, 2024 and March 21-27, 2025 grand jury/public corruption complaints that you have been ‘sitting on’ to benefit yourselves and those with whom you have political and personal relationships, I am cc’ing the [New York State Commission on Prosecutorial Conduct](#), with a request that this NOTICE & grand jury/public corruption complaint be deemed in further support of the [November 18, 2024](#) and [March 21, 2025](#) conflict-of-interest/corruption complaints that I filed with it against you, presently before its commissioners by my [March 30, 2026 letter](#). ...” (at p. 3, capitalization & hyperlinks in the original).¹

Despite the “**TIME IS OF THE ESSENCE**” urgency of the [April 14, 2026 FURTHER NOTICE & grand jury/public corruption complaint](#), **“both with respect to the FY2026-27 state budget and this year’s elections for governor, attorney general, comptroller, all 213 legislative seats, judges – and for D.A.s in at least seven counties”**, expressly stated therein, in bold (at p. 5) and demonstrated, I received NO response from any of the 62 D.A.s or from DAASNY – clearly taking their cue from the Commission, from which, likewise, I received NO response. This includes to the [March 30, 2026 letter to the commissioners](#) entitled: “Questions Whose Answers Establish Your Duty: (1) to Remove Administrator Friedman; (2) to Replace Chair Simons; (3) to Hold a Hearing on the Commission’s Operating Rules and Procedures; (4) to Reinstate for Investigation CJA’s November 18, 2024 Complaint and March 21, 2025 Complaint vs New York State’s D.A.s.”

¹ The referred-to [March 27, 2025 grand jury/public corruption complaint](#) reiterates and expands the March 3, 2025 grand jury/public corruption complaint.

Section I of the complaint form asks: “Have you submitted a complaint before?” and “If yes, what is your case file no?”. As indicated, I filed two prior complaints to the Commission. The first, on [November 18, 2024](#), was assigned case file numbers ##2024/34-95, the second, on [March 21, 2025](#), was assigned case file numbers ##2025/72-75. These numbers are identified by [Administrator Friedman’s two-sentence February 11, 2026 letter](#) dismissing both complaints, whose fraud I demonstrated by my above-entitled [March 30, 2026 letter](#), without response from the Commission.

Section IV of the complaint form asks: “Have you reported the alleged misconduct to an Attorney Grievance Committee?”. The answer to that question is the same as I furnished by the November 18, 2024 complaint (at p. 3) pertaining to [CJA’s October 14, 2016 complaint against the 62 then D.A.s and against the former D.A.s. who had been members of the Commission to Investigate Public Corruption](#) for their conflict-of-interest-driven corruption involving their D.A. salaries and relationships that I filed with the Attorney Grievance Committees of all four judicial departments, which, by fraudulent decisions, which I documented, dumped them. CJA’s evidentiary webpage establishing this, for all eight Attorney Grievance Committees of the four judicial departments, is [here](#).

Section IV also asks: “Have you reported the alleged misconduct to any other State agency?” The answer to that question is also the same as I furnished by the November 18, 2024 complaint, *to wit*,

“in 2013-14, during the life span of the D.A.-stacked Commission to Investigate Public Corruption, I reported to it what was going on, simultaneously complaining about its conflicts of interest. It never addressed its conflicts of interest and dumped the [July 19, 2013 complaint](#) and [January 7, 2014 supplement](#) I had filed with it by a [February 7, 2014 letter](#) falsely purporting that they were ‘outside our mandate’. This is particularized by my [April 23, 2014 verified complaint](#) in support of an order to show cause to intervene in the Legislature’s declaratory judgment action against the Commission to Investigate Public Corruption. CJA’s evidentiary webpage for it is [here](#).”

The names of the here complained-against 62 D.A.s are, as follows:

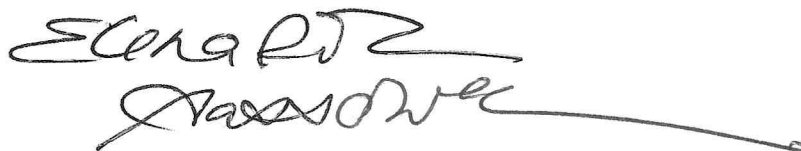
Albany County D.A. Lee Kindlon
Allegany County Acting D.A. Peter J. Degnan
Bronx County D.A. Darcel D. Clark
Broome County D.A. F. Paul Battisti
Cattaraugus County D.A. Ashley E. Smith
Cayuga County D.A. Brittany G. Antonacci
Chautauqua County D.A. Jason L. Schmidt
Chemung County D.A. Weeden A. Wetmore
Chenango County D.A. Michael D. Ferrarese
Clinton County D.A. Andrew J. Wylie
Columbia County D.A. Christopher A. Liberati-Conant
Cortland County D.A. Patrick A. Perfetti
Delaware County D.A. Shawn Smith
Dutchess County D.A. Anthony P. Parisi

Erie County D.A. Michael Keane
Essex County D.A. Michael Langey
Franklin County D.A. Elizabeth M. Crawford
Fulton County D.A. Michael J. Poulin
Genesee County D.A. Kevin Finnell
Greene County D.A. Joseph Stanzione
Hamilton County D.A. Marsha King Purdue
Herkimer County D.A. Jeffrey Carpenter
Jefferson County D.A. Kristyna S. Mills
Kings County D.A. Eric Gonzalez
Lewis County D.A. Jeffrey G. Tompkins
Livingston County D.A. Ashley Williams
Madison County D.A. Robert A. Mascari
Monroe County D.A. Brian P. Green
Montgomery County D.A. Christina Pearson
Nassau County D.A. Anne T. Donnelly
New York County D.A. Alvin Bragg
Niagara County D.A. Brian D. Seaman
Oneida County D.A. Todd C. Carville
Onondaga County D.A. William J. Fitzpatrick
Ontario County D.A. Jason MacBride
Orange County D.A. David Hoovler
Orleans County D.A. Susan M. Howard
Oswego County D.A. Anthony J. DiMartino, Jr.
Otsego County Acting D.A. Christopher Di Donna
Putnam County D.A. Robert V. Tendy
Queens County D.A. Melinda Katz
Rensselaer County D.A. Mary Pat Donnelly
Richmond County D.A. Michael E. McMahon
Rockland County D.A. Thomas E. Walsh
Saint Lawrence County D.A. Gary M. Pasqua
Saratoga County D.A. Brett Eby
Schenectady County D.A. Robert M. Carney
Schoharie County D.A. Christopher Luhr
Schuyler County D.A. Jeremy J. Hourihan
Seneca County D.A. John J. Nabinger
Steuben County D.A. Brooks Baker
Suffolk County D.A. Raymond A. Tierney, now DAASNY's president
Sullivan County D.A. Brian Conaty
Tioga County D.A. Kirk Martin
Tompkins County D.A. Matthew Van Houten
Ulster County D.A. Emmanuel Nneji
Warren County D.A. Jason Carusone
Washington County D.A. J. Anthony Jordan
Wayne County D.A. Christine Callanan
Westchester County D.A. Susan Cacace

Wyoming County D.A. Vincent A. Hemming
Yates County D.A. Todd J. Casella

In further compliance with the Commission's complaint form stating "Judiciary Law 499-f requires that complaints be signed and in writing", the form, attaching this complaint, is – and I here additionally attest that the complaint is true, under penalties of perjury, pursuant to CPLR §2106.

Thank you.

Two handwritten signatures are present. The first signature, "Vincent A. Hemming", is written in a cursive style with a long horizontal line extending to the right. The second signature, "Todd J. Casella", is written below the first, also in a cursive style with a long horizontal line extending to the right.