



COUNTY OF ERIE

MICHAEL A. SIRAGUSA
COUNTY ATTORNEY

MARK C. POLONCARZ
COUNTY EXECUTIVE

MICHELLE M. PARKER
FIRST ASSISTANT COUNTY ATTORNEY

DEPARTMENT OF LAW

JEREMY C. TOHL
SECOND ASSISTANT COUNTY ATTORNEY

January 17, 2012

Mr. Robert M. Graber, Clerk
Erie County Legislature
92 Franklin Street, 4th Floor
Buffalo, New York 14202

Dear Mr. Graber:

In compliance with the Resolution passed by the Erie County Legislature on June 25, 1987, regarding notification of lawsuits and claims filed against the County of Erie, enclosed please find a copy of the following:

File Name:	Albert J. Connolly vs. Patricia L. Fulwiler, Erie County Deputy Clerk, et al.
Document Received:	Summons and Complaint – civil rights
Name of Claimant:	Albert J. Connolly
Claimant's attorney:	Pro se

Should you have any questions, please call.

Very truly yours,

MICHAEL A. SIRAGUSA
Erie County Attorney

By: MICHELLE M. PARKER
First Assistant County Attorney

MMP/dld
Enclosure

UNITED STATES DISTRICT COURT

for the

Northern District of Georgia

Albert J. Connolly

Plaintiff

v.

Patricia L. Fulwiler

Defendant

Civil Action No.

1:11-CV-4298

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Patricia L. Fulwiler
County of Erie
92 Franklin Street
Buffalo, NY 14202

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Albert J. Connolly
1300 University Dr., N.E.
Atlanta, GA 30306

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

JAMES N. HATTEN
CLERK OF COURT

Handwritten signature of James N. Hatten

Signature of Clerk or Deputy Clerk

Date: 12 DEC 2011

DEC 20 2011

Civil Action No. _____

PROOF OF SERVICE

(This section must be filed with the court unless exempted by Fed. R. Civ. P. 4 (l).)

This summons for *(name of individual and title, if any)* Patricia L. Fulwiler
was received by me on *(date)* _____

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

United States District Court
Northern District Of Georgia
Atlanta Division

FILED IN CLERK'S OFFICE

DEC 12 2011

Albert J. Connolly,
Plaintiff

CLERK
Deputy Clerk

Vs.

James "Harry" Williams, Investor
and Principal in Kimmins Corp. and
Integrated Waste Services et al

1:11-CV-4298

Civil File No. _____

Joseph Cassata, individually
and in his capacity as a City Court
Judge for the City of Tonawanda,
New York

Complaint for Violation of Civil
Rights and Oppression Under Color
Of Office

Mark Saltarelli, individually
and in his capacity as a City Court
Associate Judge for the City of
Tonawanda, New York

Jury Trial Demanded
Stay of December 21st Hearing
Pending Trial of the Issues herein

Hon. Ronald J. Pillozzi, Mayor of
The City of Tonawanda, N. Y.

Steve George, individually and as
Heir to John George Enterprises
and Main Grove Auto Sales

Patricia L. Fulwiler, Erie County
Deputy Clerk, Legal

Defendants

Plaintiff, Albert J. Connolly appears herein, for himself and complains of the Defendants, James H. Williams, et al and for Cause of Complaint and alleges:

JURISDICTION

The Jurisdiction of this Court to hear the Plaintiff's Complaint is based upon the original Jurisdiction of the District Court to hear complaints of injured Parties arising under the Constitution, Laws, or Treaties of the United States.

Apropos to this Complaint, the Civil Rights and Elective Franchise Ad, 28 USCA Sec. 1343, sets out as follows in Sec. (3):

The District Courts shall have original jurisdiction of any civil action authorized by law to be commenced by any person to redress deprivation, under color of any state law, statute, ordinance, regulation custom or usage of any right, privilege, or immunity secured by the Constitution of the United States or by any act of Congress providing for equal rights of citizens or of all persons under the jurisdiction of the United States.

VENUE

2. This action is a civil proceeding for recovery of pecuniary damages both compensatory and punitive. Defendants are subject to Georgia's Long Arm Statute because of business that they conduct in the State of Georgia. Defendants reside in, or are found the States of New York, Florida and Georgia. Def. James "Harry" Williams, particularly is subject to, OCGA 9-10-91 et seq. because of his presence and business interest in the State of Georgia.

PLAINTIFF

3. The Plaintiff, Albert J. Connolly is a resident of DeKalb County, Georgia.

DEFENDANTS

4. (a) Defendant Joseph Cassata was a member of Cassata and Cacciato during the time that Cassata and Cacciato purported to be representing this Plaintiff. Ignoring the fact of their malpractice, Judge Cassata is statutorily disqualified to sit on judgment of Connolly v. George.

(b) Defendant Mark Saltarelli is also statutorily disqualified because past legal advice and involvement in the issue herein.

(c) Def. Harry Williams was the guarantor for Def. John George's lease and served as the agent-provocateur, influencing Tonawanda City Court to protect his protégé, Def. Steve George's father from prosecution.

(d) Def. Steve George is the beneficiary of preferential and illegal treatment afforded his late father, Def. John George by the above-mentioned Tonawanda City Court Judges, Defendants, Cassata and Saltarelli.

(e) Defendant Patricia L. Fulwiler is Erie County Deputy County Clerk, Legal and as such is the responsible to Plaintiff's for unauthorized transfer of Plaintiff's Petition for monies to Tonawanda City Court.

(f) Ronald J. Pillozzi is the Mayor for City of Tonawanda, N.Y. and is responsible for appointing Def. Mark Saltarelli Associate Judge.

FACTUAL PREDICATE

During the eighties and nineties both the Federal Government and the State Government maintained Organized Crime Task Forces in Erie

County, New York because of the influence of Major Crime Families. During this time, the City Court of Tonawanda NY was harboring the Buffalo Mob in the persons of Leon Schectman, John Georgdias aka John George and John George's mentor, Def. Harry Williams. (Harry Williams and his brothers once picked up the garbage on Grand Island; that was until they, bought a bankrupt landfill and sold same to Browning-Ferris for millions). Since then, Williams, has used his new wealth to corrupt Public Officials including the Judges herein. All Judges could expect for starters, to be invited to Def. Harry Williams' 4th of July picnic, for an introduction.

City Court Tonawanda N.Y. has been and is still working frantically to make sure that the Plaintiff's tenant, Defendant and Mob Member John George has immunity and that rampant loan sharking flourishes In Tonawanda, thanks to the protection afforded by the City Court. Also, to secure the only money now known as Unclaimed Funds that Def John George was ever required to pay by Tonawanda City Court for his years of occupying Plaintiff's property, rent-free.

Private Detective Neil J. Schehan stated: "John George has two Tonawanda Police Detectives on his payroll".

RELEVANT STATUES and CONSTITUTION AMENDMENTS

6. Plaintiff is entitled to enjoy all the rights and privileges arising under the Constitution and laws of the United States. Plaintiff is entitled to recover since Defendants have infringed upon and deprived the Plaintiff of his rights and liberties violating 42 U.S.C.A. Sec. 1983, which forbids a deprivation of Constitutional Rights under Sec. 1 of the Fourteenth Amendment to the United States Constitution which protects against invasions and unlawful "seizures." Further, Jurisdiction is based on Diversity of Citizenship, 28 U.S.C. Sec. 1332 and the amount in controversy exceeds \$75,000.

UNDER COLOR of STATE LAW

7. The Defendants were acting in their respective capacities as stated, under color of certain statutes of the State of New York,

namely the following McKinney's Judiciary Law, Sec. 14 which reads as follows:

It is provided by statute that a Judge may not sit as such in or take part in the decision of, an action or proceeding in which he has been attorney or counsel. The reason for the statutory rule is that no matter how upright the judge may be, the statutory prohibition is Absolute and constitutes a disqualification of the Judge which deprives him of jurisdiction, and all proceedings before him being void.

8. The Defendants in particular, Defendant Harry Williams are subject to Georgia Long Arm Statute, OCGA, Sec. 9-10-91, because Def. Williams and companies he is responsible for are doing business requiring his presence in the State of Georgia.

Facts-Cause 1

9. Defendant James "Harry" Williams guaranteed Def. John Georges' lease to the Plaintiff and retained Arc Petricca Esq. to defend the Plaintiff's tenant herein. Arc Petricca's defense of Def. John George consisted of corrupting Tonawanda City Court. Thomas Burgasser Esq. succeeded Petricca and continued the

corruption of Tonawanda City Court Judges and Chief Clerk, Mary Stroebel. (See Complaint to James Cole, Deputy Attorney General, U. S. Department of Justice annexed as Exhibit A).

Defendant Williams is a quintessential political operative and has actively used his Grand Island home and 4th of July picnics to influence Tonawanda City Court personnel, especially Judges Cassata and Saltarelli. This corruption has made it impossible for the Plaintiff to retain a reliable attorney to represent him in his rent claim against Def. John George et al in Tonawanda City Court.

Facts-Cause 2

10. Defendant Cassata actively subverted Plaintiff's Attorney Torres when he, asked to review Plaintiff's Tonawanda Court file for Connolly v. George. Attorney Torres had requested that he be allowed to prosecute the Plaintiff's rental complaint against the Defendant Steve George's late father, Def John

George who was the recipient of over 30 years of illegal protection from Tonawanda City Court personnel. (See Plaintiff's letter to Nelson Torres Esq. annexed as Exhibit B).

Facts-Cause 3

11. Defendant Mark Saltarelli is statutorily disqualified because of previous involvement as a practicing attorney under the afore-mentioned McKinney's Judiciary Law (See Plaintiff's letter to Def. Saltarelli annexed as Exhibit C).

Facts-Cause 4

12. Defendant Mayor Pilozzi had the unfortunate duty of appointing Defendant Mark Saltarelli Associate Judge for Tonawanda City Court and Def. Saltarelli refused to recuse himself.

Facts-Cause 5

13. Defendant Steve George as heir to his late father's corrupt protection by Defendants, Harry Williams, Cassata, Saltarelli and as yet un-served, the instigator, Tonawanda City Chief Clerk, Mary Stroebel, is the recipient of the wealth created by these Defendants and as such is obligated to pay his father's debts.

14. The Plaintiff contends that all the defendants as either principals or agents are primarily or secondarily liable for the violations of the Plaintiff's rights and liberties under 42 U.S.C. Section 1983 and Section 1 of the Fourteenth Amendment to the United States Constitution.

15. The Plaintiff contends that as a direct and proximate cause of unlawful acts herein, above alleged which were committed in disregard of the plaintiff's rights. Plaintiff suffered great mental and physical distress, has been damaged in his good name, and reputation has been subjected to great humiliation

and loss of revenue and use of his property, and has been caused to incur unnecessary legal expenses with the concomitant personal economic losses.

Prayers for Relief

Wherefore, Plaintiff sues and demands the following relief from the Defendants; to wit:

16. The Defendants be required to answer this Complaint.

17. That this Honorable Court determine the violations or violation of 42 U.S.C.A. Section 1983, Section 1 of the Fourteenth Amendment to the United States Constitution, and the Fourth Amendment to the United States Constitution.

18. That the Plaintiff demands judgment against the Defendants, and each of them for damages, actual and punitive

under Causes 1 and 2 as set above in the amount of Five Hundred Thousand Dollars (\$500,000.00) for each Cause.

19. That your Plaintiff demands judgment against the Defendants and each of them for damages, actual and punitive as set out in Causes 3, 4, and 5 above in the amount of \$500,000.00) for each Cause, individually.

20. That this Honorable Court requires the Defendants Cassata and Saltarelli to recuse themselves from hearing the Plaintiff's Petition on December 21, 2011 and further recuse themselves as required by McKinney's Judiciary Law. That this Honorable Court rule that Defendants illegal conduct was deliberate and was calculated to drive Plaintiff out of the City of Tonawanda so as to facilitate a *in rem* sale of the Plaintiff's Car Wash property for benefit of City of Tonawanda. Defendants especially, now Honorable Joseph Cassata barred the Plaintiff bidding on his property at said *in rem* sale. Once again, when the

Plaintiff thought he retained to sue this Cause, he found Defendants, Cassata and Williams were able to subvert his Lawyers. (See Letter from Def. Cassata to Howard Kleiman Esq. annexed as Exhibit D). Attorney Kleiman claimed he could not represent this Plaintiff because he, suddenly discovered he had once worked for Defendant James "Harry" Williams?

21. That a jury be empanelled to hear this cause.

22. The Plaintiff further demands judgment against the Defendants for attorney's fees, pursuant to the provision of Title 42 United States Codes, Section 1988.

23. Plaintiff further demands judgment against Defendants for costs and disbursements of this action.

Dated at Atlanta Georgia this 12th day of December, 2011.

Respectfully submitted,


Albert J. Connolly Pro Se

1300 University Drive, N.E.
Atlanta, GA, 30306
404.403.9221

Certificate of Service

This is to certify that I have this day served a copy of the foregoing Plaintiff's Summons and Complaint upon the following by placing said Copy of Summons and Complaint in United States Mail in a Properly addressed envelope with sufficient postage affixed thereon to Ensure delivery to:

Hon. Joseph Cassata
City Court, Tonawanda, New York
200 Niagara Street
Tonawanda New York 14225

Patricia L. Fulwiler, Deputy
Erie County Court Clerk
25 Delaware Avenue, Part 7
Buffalo, N. Y. 14202

Hon. Mark Saltarelli
City Court, Tonawanda, New York
200 Niagara Street
Tonawanda New York 14225

James Harry Williams
Former Schoellkrof Mansion
Lewiston Heights, N. Y. or
Laker Airways
2953 Simms Street
Hollywood Florida

Steve George
c/o R. Thomas Burgasser, Esq.
825 Payne Avenue
North Tonawanda, N. Y. 14120

Hon. Ronald Pilozzi
Mayor, City of Tonawanda
200 Niagara Street
Tonawanda, N. Y. 14225

Dated at Atlanta Georgia this 12th day of December, 2011

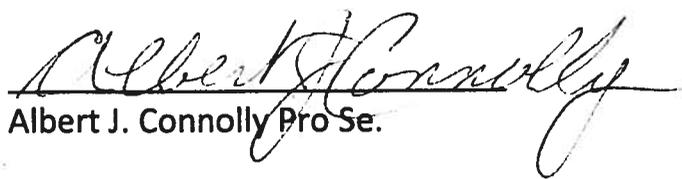

Albert J. Connolly Pro Se.

EXHIBIT A

James M. Cole, Deputy Attorney General
United States Department of Justice
Robert F. Kennedy Department of Justice Bldg.
950 Pennsylvania Avenue N. W.
Washington D. C. 20530.

1300 University Dr.N. E.
Atlanta, Georgia 30306
November 4, 2011

Re: Organized Crime Task Force, Buffalo, N. Y.

Dear Sir:

City Court, Tonawanda, New York has been fostering, promoting and protecting The Buffalo Mob for over the last 30 years. The Buffalo Mob in the person of Loan Shark Leon Schectman et al used my car wash located at 135-137 Main Street City of Tonawanda N. Y. for their base of operations while and as long as Mob Member/Def. John Georgiadis aka John George was the tenant. After Def. George left, he left Chief Clerk Mary Stroebel, City Court Tonawanda N. Y. to take over and to continue the Buffalo Mob's influence with her own form of an extortion racket.

Every lawyer that this Plaintiff has retained to prosecute a tenant, now known as Mob Member/Def. John George has been compromised by Clerk Mary Stroebel when he tries to look at the Court File, Connolly v. George, for unpaid rent, taxes, water bill, theft of property et al in Tonawanda City Court files. Clerk Mary Stroebel was corrupted by Thomas Burgasser Esq. Clerk Mary Stroebel in turn corrupted this Plaintiff's attorney, Richard Southard Esq. Mr. Southard was eventually disbarred.

Mary Stroebel, Chief Clerk, City Court Tonawanda has kept Def. John George immune from prosecution for over 30 years by this Plaintiff. Now, Clerk Mary Stroebel with the assistance of, recently recruited, Deputy Erie County Clerk, Patricia L. Fulwiler is poised to illegally assure Def. George the only monies, known as Unclaimed Funds that Def. George ever paid into Tonawanda City Court. City Court Tonawanda allowed Mob Member/Def. John George to ignore Their Court Order.

Recently, as stated, this Cabal has been successful in recruiting Patricia L. Fulwiler, Deputy Erie County Clerk into their extortion scheme. (See Plaintiff's letter to Ms. Fulwiler attached as Ex. #1).

The tenant herein, Defendant John George, used the opportunity that was given to Him to corrupt the City Court Tonawanda New York personnel into collaborating with him, Def. John George in his extortion racket. Def. George corrupted Thomas Burgasser Esq., who in turn corrupted then Clerk Mary Stroebel, who in turn corrupted Lawyers, Joe Cassata Esq., Ron Trabuco Esq. and lastly, Louis M. Cacciato Esq., in that order.

When Def. George approached this Plaintiff initially, to lease Him his car wash, he pleaded that he had no money but he would be a "good tenant". He, Def. George had been convicted of a felony in Buffalo City Court in 1959 and no one would give him credit. This Plaintiff allowed Def. George to pay a one (1) month rent deposit over six months. Def. George's lease required him to pay rent, City, County and School Taxes, water usage and all maintenance. With the assistance/collaboration of City Court Tonawanda in the person of their Clerk, Mary Stroebel, Def. George has successfully avoided paying any of the above for over 30 years.

This Plaintiff has retained at least 10 attorneys to prosecute Def John George who when they come in contact with City Court Tonawanda Clerk Mary Stroebel become part of Ms Stroebel's Extortion Effort. More than one of the aforementioned attorneys have cautioned; "You will never get a judgment against John George in Tonawanda City Court as long as Harry Williams is alive" (See complaint to Office of Court Administration attached as Ex.2).

Mary Stroebel, City Court Tonawanda Clerk after corrupting this Plaintiff's Attorney, Nelson Torres Esq., had the arrogances to claim that this Plaintiff had abandoned his cause of action against Defendant/Extortionist John George and his Attorneys, Arc Petrica Esq. and recently Thomas Burgasser Esq.

Recently, Clerk Mary Stroebel as previously stated has been successful in obtaining the collaboration of Deputy Erie County Clerk Patricia L. Fulwiler,

wittingly or unwittingly, in her extortion scheme. Deputy Clerk Patricia L Fulwiler is now available for all to depose.

The Defendant John George, through his Attorneys Arc Petrica Esq. and his successor, Thomas Burgasser Esq. extortion racket has resulted in the Wrongful Foreclosure of this Complainant's Car wash Property in this Action.

While my Attorney, Louis M. Cacciato Esq. was professing to be prosecuting Def. John George, he, Cacciato was simultaneously foreclosing this Plaintiff's property for unpaid taxes. Defendant John George never saw a Courtroom. (See Attorney Cacciato's Letters annexed as Ex. 3).

Thank you for your attention to my Complaint,

Yours truly,

Cc: Office of Court Administration

EXHIBIT B

Albert J. Connolly

P. O. Box 28143
Atlanta, GA 30358

December 27, 1999

Nelson S. Torre, Esq.
Attorney at Law
1605 Liberty Building
420 Main Street
Buffalo, New York 1402

REF: Connolly V. George

Dear Mr. Torre:

From the points and presentations in your letter of November 23, 1999, it is obvious that the Tonawanda City Attorney, Ronald Trabucco, and/or the Honorable Judge Joe Cassata contributed substantially to the information in the file on the above-captioned action. Allow me to correct some of these misconceptions as follows:

- 1) Louis M. Cacciato, while in the partnership of Bridge and Cacciato, incorporated the Forcon Construction Corporation using his then address, 69 Delaware Avenue, Buffalo, New York, 14220, as the address for Forcon.
- 2) Louis M. Cacciato collected the rent from the tenant, John Georgeadis a/k/a John George, deducting his fee and remitting the balance to me.
- 3) Louis M. Cacciato, Esq., subsequently formed a partnership with Joseph J. Cassata, Jr., in the law firm, Cassata & Cacciato, Attorneys-at-Law, 535 Delaware Steet, City of Tonawanda, New York, 14150.
- 4) Cacciato et al, advised everyone but failed to advise the N.Y. Secretary of State office that the new address for the corporation FORCON had been changed from 69 Delaware Avenue, Buffalo, NY, to the aforementioned new address of the new partnership Cassata and Cacciato, et al.
- 5) Louis M. Cacciato, Esq., continued collecting the rents from his new address from the aforementioned John George which had routinely required resorting to the serving of a petition on the tenant who would then show up in Tonawanda City Court and pay his back rent prior to trial.

EXB
- 1 -

- 6) What had not been announced with the forming of the partnership between Cassata and Cacciato, Attorneys, was the simultaneous appointment of Joe Cassata and Louis Cacciato as the City of Tonawanda, attorneys.
- 7) When John George through his attorney, Arc Petricea, discovered that Louis M. Cacciato as the City of Tonawanda attorney, was unable to appear on behalf of the landlord he, George, stopped paying his rent.
- 8) Ronald Trabucca was never retained by this Complainant. As far as this deponent information went, Ronald Trabucco was an attorney with the law firm aforementioned.
- 9) Ronald Trabucca was successful in obtaining a judgment, but same was vacated by the Honorable Marlin Salmon (see Judge Salmon's judgment of November 2, 1978 annexed, as Exhibit 1).
- 10) This Complainant filed suit against Marlin Salmon (see same annexed as Exhibit 2.).
- 11) Joe Cassata and the then Mayor of the City of Tonawanda, both Democrats, used this Complainant's cause to fire Judge Marlin Salmon, Republican.
- 12) I know it is too early in the process for Fran/Harry Williams to have corrupted or even contacted you. The same cannot be said of some of the attorneys involved in my complaint against my tenant, John Georgeadis a/k/a/ John George.
 - (a) Ron Trabucco accepted the tenant's word that the car washing equipment that he, John George, offered as a substantial part of his settlement was free and clear of all liens.
 - (b) An UCC search subsequently revealed that this car washing equipment being offered by John George carried an open undischarged lien in favor of Manufacturers and Traders Trust Company.
 - (c) No one, particularly Ronald Trabucco, Esq., was interested in discharging the tenant's recorded UCC lien in favor of Manufacturer's & Traders and against the car washing equipment.
 - (d) Consequently, this deponent had no alternative but to turn down his tenant's flawed settlement offer.
 - (e) Notwithstanding, and in full knowledge of this fact, that an open lien existed against said car wash equipment, Ronald Trabucco, Attorney and Counselor-at-Law, swore out a false affidavit that this deponent's rent complaint against John George was settled.

- (f) Before this deponent retained Richard M. Southard to prosecute the action herein against Harry/Fran William's protégé John Georgeadis a/k/a John George, this deponent inquired of Mr. Southard, "Do you perform any legal work for Harry Williams et al?"
- (g) After Richard M. Southard responded "Who is Harry/Fran Williams?", this deponent gave Mr. Southard the \$1,000.00 retainer he had requested.
- (h) In September 1991, Richard M. Southard, Attorney-at-Law, and this deponent attended Tonawanda City Court on an unrelated matter.
- (i) Richard M. Southard took this opportunity to wave across the courtroom at John George who was attending Tonawanda City Court to collect a debt for his limousine business.
- (j) Richard M. Southard, after he noticed my consternation, stuttered, "I have not seen him, meaning John George, since last summer at Harry Williams' 4th of July picnic on Grand Island."
- (k) Mr. Southard conned me into giving him an additional \$1,000.00 on the pretense that he was, at last, going to prosecute the John George action. As soon as received this \$1,000.00, Southard filed a motion to be relieved as the Attorney of Record.
- (l) It is advisable that you examine before you accept the Cassata-Trabucco version, the discovery file on the captioned cause. Contact Richard M. Southard who is presently working under the license of Steven Southard at the office of his old law firm at 550 S. Transit, Lockport, New York.

Sincerely,

Albert J. Connolly

/lw

cc: Vincent T. Scarsella
State of N. Y. Attorneys Grievance Committee

EXHIBIT C

Hon. Mark Saltarelli
Tonawanda City Court
200 Niagara Street
Tonawanda New York
14224

1300 University Drive N. E.
Atlanta Georgia 30306
November 4, 2011

Dear Judge Saltarelli:

Thank you for your recent letter concerning Connolly v. George .It is nice to hear from you again and have the opportunity to congratulate you on your elevation to the Bench.

I would like to have your expertise on Connolly v. George but unfortunately as you realize you are statutorily disqualified.

I am sure you will remember our consultations on the aforementioned and the expectations that I had while my son, Edward attended the Moot Court Classes that you conducted at Tonawanda High School.

I was hoping that your inspiration and efforts would motivate Eddie into going to Law School. However, when his band won "The Battle of the Bands" annual competition at University at Buffalo my ambitions to have an Attorney in the family were doomed.

I was intrigued by your reference to Richard Southard in your letter. It was my concern that Southard was a plant by Harry Williams that was the substance of my conversation with you. It is time that Def. John George's mentor, Harry Williams was subjected to Discovery. Southard was never my lawyer; I just paid him. Southard never brought Def. John George into any Court, especially Tonawanda City Court.

When I was in Tonawanda City Court with Southard to apparently arrange a date for my rent claim against Def. George, Southard spied John George across the Courtroom and dash over to shake his, Def George's hand. John George was in Tonawanda City Court to collect a bill owed to his Limo Service. Upon returning to our table he, Southard, saw that I was angry. Southard blurted out, by way of an excuse for his conduct;" I have not seen

John George since Harry Williams' Fourth of July Picnic" Before I retained Richard Southard, I had deliberately asked Him, Southard, "have you ever done any work for Harry Williams; Southard replied: "who is Harry Williams"? Def. George's lease had been subordinated to Harry Williams. How many other of Tonawanda City Court personal have been participants at Harry Williams' Fourth of July Picnics?

IT was not because of any lack of effort on my part that Southard was not replaced. Ron Trabucca Esq., Joe Cassata Esq. now the Honorable Joseph Cassata and Clerk Mary Stroebel were successful in scaring off the numerous other lawyers that I retained to prosecute Defendant George.

Nelson Torres Esq., in particular, requested the opportunity to prosecute my "simple rent action", Connolly v. George. After being bombarded by the aforementioned, Ron Trabucca Esq. and the Hon. Joseph Cassata he, Nelson Torres reneged but did not give me back my retainer. (See Connolly v. Torres enclosed)

Thanks again your Honor on behalf of myself and my son, Edward. I will expect to receive your Letter of Recusal, timely.

Yours truly,

Albert J. Connolly, Plaintiff

Cc: New York State Attorney General
Investigative Bureau

Thomas Burgasser Esq.

EXHIBIT D

Office of City Attorney

CITY OF TONAWANDA, NEW YORK 14150
CITY HALL ... 200 NIAGARA STREET
TELEPHONE: 716-695-1800 OR 716-692-6119

Joseph J. Cassata, Jr.
CITY ATTORNEY

S. Michael Rua
DEPUTY CITY ATTORNEY

March 18, 1991

Howard Kleiman, Esq.
Lavin & Kleiman
528 Brisbane Building
Buffalo, NY 14203

Re: Forcon v. City of Tonawanda and Carnduff

Dear Mr. Kleiman:

This letter will confirm my telephone conversation with you wherein I requested a general extension to answer until such time as we had an opportunity to pursue this matter through our insurance company. I understand the co-defendant has not yet been served.

So that this matter does not become unnecessarily delayed, I will keep in touch with our insurance carrier. If you desire an immediate answer, please notify me. If not, I shall consider this generally extended.

Thank you for your cooperation.

Very truly yours,

Joseph J. Cassata
JOSEPH J. CASSATA

JJC/s

