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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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| ELIOT BERNSTEIN on behalf of  IVIEWIT TECHNOLOGIES INTEREST HOLDERS,  Plaintiffs Pro Se  -against-  APPELLATE DIVISION FIRST DEPARTMENT DEPARTMENTAL DISCIPLINARY COMMITTEE, et al. | CASE NO. 1:07-cv-11196-SAS  United States District Court Judge SHIRA A. SCHEINDLIN Presiding  LEGALLY RELATED  ASSOCIATED CASE  Christine Anderson v. The State of New York et al  CASE NO. 1:07-cv-09599-SAS |

**PLAINTIFFS' ("IVIEWIT COMPANIES INTEREST HOLDERS") MOTION TO REOPEN AND MEMORANDUM OF LAW IN COMPLIANCE WITH HER HONORABLE SHIRA A. SCHEINDLIN'S INDIVIDUAL RULES OF PRACTICE SEEKING CORRECTION OF THIS COURT'S DOCKET ANALYSIS CONFIRMED FLAGRANT PREJUDICES IN FAVOR OF OFFICIAL CORRUPTION FRAUD CIVIL RIGHTS CO-DEFENDANT ATTORNEY GENERAL'S ILLEGAL AND UNETHICAL LEGAL MALPRACTICE REPRESENTATION OF NEW YORK STATE CO-DEFENDANTS TO CAUSE FIVE YEARS OBSTRUCTION OF PATENT DISPUTE, RICO LITIGATION, WORSENING INJURIES TO PUBLIC INTEREST AND U.S. ECONOMY; QUELLED WITH ENFORCEMENT OF U.S. CITIZENS' RIGHT TO PETITION FEDERAL COURT FOR REDRESS OF GRIEVANCES PURSUANT TO U.S. CONSTITUTION AND PURSUANT TO U.S. COURT OF APPEALS FOR THE FEDERAL CIRCUIT'S APRIL 23, 2012 DECISION THAT FEDERAL COURT HAS EXCLUSIVE JURISDICTION OVER LEGAL MALPRACTICE CLAIMS ARISING OUT OF PATENT PROSECUTION; AND PURSUANT TO AUGUST 15, 2011, GOVERNOR CUOMO SIGNED INTO LAW THE PUBLIC INTEGRITY REFORM ACT OF 2011.**

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**Enacts the public integrity reform act of 2011**

### N.Y. EXC. LAW § 63-a : NY Code - Section 63-A: Action by attorney-general for forfeiture of public office

Section (12) The attorney-general may maintain an action, upon his own information or

upon the complaint of a private person, against a public officer, civil

or military, who has done or suffered an act which by law works a

forfeiture of his office.

12. Whenever any person shall engage in repeated fraudulent or illegal

acts or otherwise demonstrate persistent fraud or illegality in the

carrying on, conducting or transaction of business, the attorney general

may apply, in the name of the people of the state of New York, to the

supreme court of the state of New York, on notice of five days, for an

order enjoining the continuance of such business activity or of any

fraudulent or illegal acts, directing restitution and damages and, in an

appropriate case, cancelling any certificate filed under and by virtue

of the provisions of section four hundred forty of the former penal law

or section one hundred thirty of the general business law, and the court

may award the relief applied for or so much thereof as it may deem

proper. The word "fraud" or "fraudulent" as used herein shall include

any device, scheme or artifice to defraud and any deception,

misrepresentation, concealment, suppression, false pretense, false

promise or unconscionable contractual provisions. The term "persistent

fraud" or "illegality" as used herein shall include continuance or

carrying on of any fraudulent or illegal act or conduct. The term

"repeated" as used herein shall include repetition of any separate and

distinct fraudulent or illegal act, or conduct which affects more than

one person.

In connection with any such application, the attorney general is

authorized to take proof and make a determination of the relevant facts

and to issue subpoenas in accordance with the civil practice law and

rules. Such authorization shall not abate or terminate by reason of any

action or proceeding brought by the attorney general under this section.