

NEW YORK STATE  
COMMISSION ON  
PROSECUTORIAL CONDUCT



Annual  
Report 2026



**Commission on  
Prosecutorial Conduct**

**MICHAEL A. SIMONS**

Chair

**SUSAN FRIEDMAN**

Administrator

February 27, 2026

Governor Kathy Hochul, Chief Judge Rowan D. Wilson, and The Legislature of the State of New York:

Pursuant to Pursuant to Judiciary Law § 499-d(4), the New York State Commission on Prosecutorial Conduct respectfully submits this Annual Report of its activities, covering the period of January 1 through December 31, 2025.

Respectfully submitted,

A handwritten signature in black ink that reads "Susan Friedman".

Susan Friedman, Administrator  
On Behalf of the Commission

**NEW YORK STATE  
COMMISSION ON PROSECUTORIAL CONDUCT**

**COMMISSION MEMBERS**

MICHAEL A. SIMONS, ESQ., *CHAIR*

HON. MICHAEL J. OBUS, *VICE CHAIR*

DANIEL R. ALONSO, ESQ.

MAYO BARTLETT, ESQ.

CHANTELLE C. BOTTICELLI, ESQ.

HON. STEPHEN J. DOUGHERTY

HON. RANDALL T. ENG

BRIAN J. GRIFFIN, ESQ.

MARNE L. LENOX, ESQ.

ANDREA GLENN LOIGMAN, ESQ.

AMY B. MARION, ESQ.

## **COMMISSION STAFF**

**Susan Friedman**

*Administrator*

### **NEW YORK CITY OFFICE**

Brenda Correa, *Deputy Director of Investigations*

Robert Maes, *Associate Counsel*

Sarah O’Leary, *Associate Counsel\**

Myasia Fajardo, *Executive Assistant*

Jeanae Peterson, *Administrative Assistant*

### **ALBANY TEAM**

Jacob Sherwood, *Director of Finance and Operations*

Kimberly Hayden, *Director of Human Resources and Public Information Officer*

\*This staff member started in February 2026.

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## **I. Introduction and History**

The New York State Commission on Prosecutorial Conduct (“the Commission” or CPC) was created in 2021, pursuant to Judiciary Law §§ 499-a – 499-j. The Commission comprises 11 non-salaried members appointed by the Governor, the Chief Judge, and the majority and minority leaders of the legislature. The Commission serves to strengthen oversight of New York’s prosecutors and to hold them to the highest ethical standards in the exercise of their duties. The Commission has the authority to review and investigate the conduct of prosecutors in all 62 counties of New York State in the course of their official duties.

Following the authorization of an investigation, the Commission is empowered to conduct a full range of investigative functions, including holding hearings, subpoenaing witnesses, requiring production of documents, conferring immunity, and transmitting findings of fact and recommendations to the relevant attorney grievance committee. Commission investigations are confidential, but once a matter is concluded the Commission makes its findings and recommendations public. The bylaws governing the Commission and its staff can be found in appendix B.

A quorum of commissioners was appointed in 2023. In March 2024, the Commission appointed an Administrator who initiated the agency’s operations.

## **II. Staffing, Office Space, and Agency Activity Update**

A significant portion of the agency’s effort in 2025 was devoted to adding staff. The first staff member—the director of finance and operations, joined the agency in January. By the end of 2025, agency staff also included a deputy director of investigations for the New York City region, an associate counsel, a director of human resources, an investigative analyst, an executive assistant, and an administrative assistant, for a then-total of 8 employees. Since then, the agency has added two associate counsels and an assistant counsel, and is in the final stages of interviewing for a deputy director of investigations for the Albany region.

In November 2025, the Commission opened a temporary New York City office at 39 Broadway in Manhattan’s Financial District. This location is a sublease from the New York Waterfront Commission and expires in October 2026. The agency is working with the New York State Office of General Services to secure a lease for a permanent New York City office, which will serve as the Commission’s primary office. The Commission also plans to open an Albany office in the near future.

The agency’s growth can also be seen in the volume of complaints received since becoming operational. After receiving 131 complaints in 2024, the agency received 348 in 2025. Complaints are now accepted through an online portal and paper mail addressed to the NYC office.<sup>1</sup> Although the CPC has been successful in methodically tracking each complaint from receipt to disposition, building out a more sophisticated technological infrastructure is essential. The agency is working toward purchasing and customizing a case management system that will centralize the CPC’s current files, facilitate document control, and further streamline productivity.

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<sup>1</sup> Prior to the opening of the NYC office, the Commission used a P.O. box for mailed correspondence. As of December 2025, that P.O. box is closed, but mail continues to be forwarded to the NYC office.

Despite focusing extensively on start-up operations, the agency was able to end 2025 with a stabilized workflow and established protocols for moving cases through the system. With minimal staffing for most of the year, the agency was able to respond to 35.3% of complaints submitted in 2024 and 2025, and actively continues to review all remaining complaints.

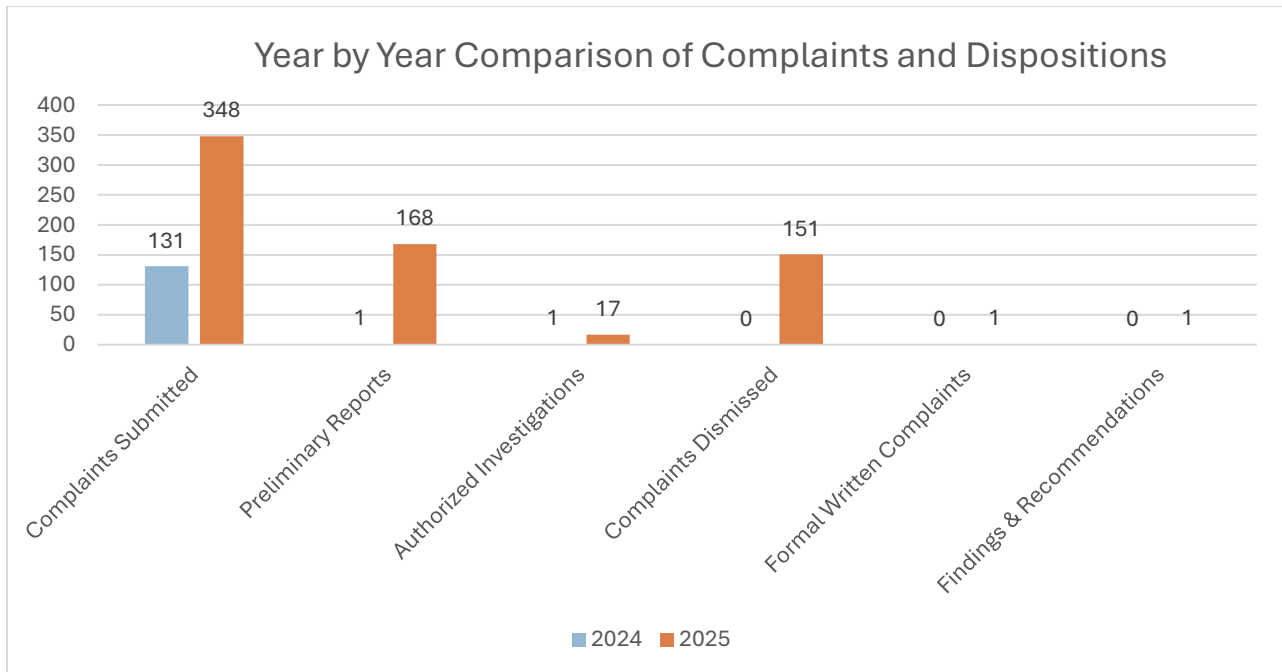
### III. Statistical Analysis of Complaints

#### A. Action Taken Upon Receipt of a Complaint

Upon receipt of a complaint, a member of the agency’s investigative team prepares a preliminary report. These preliminary reports may require agency staff to contact the complainant or attorney for additional information. Agency staff will also review any supplemental materials submitted by the complainant, such as police reports, court files, and correspondence with a prosecutor. Preliminary reports are then presented to the Commission for a vote on whether the complaint should be investigated further or dismissed.

A comparison of preliminary reports and dispositions within each calendar year is presented below.

##### 1. *Complaints, Reviews, and Dispositions*



While the bar graph captures agency output within each calendar year, the below accounts for the Commission’s dispositions of backlogged complaints throughout 2025.

Of the 131<sup>2</sup> complaints submitted in **2024**,<sup>3</sup> the following dispositions were issued by the Commission in response to 87 preliminary reports:

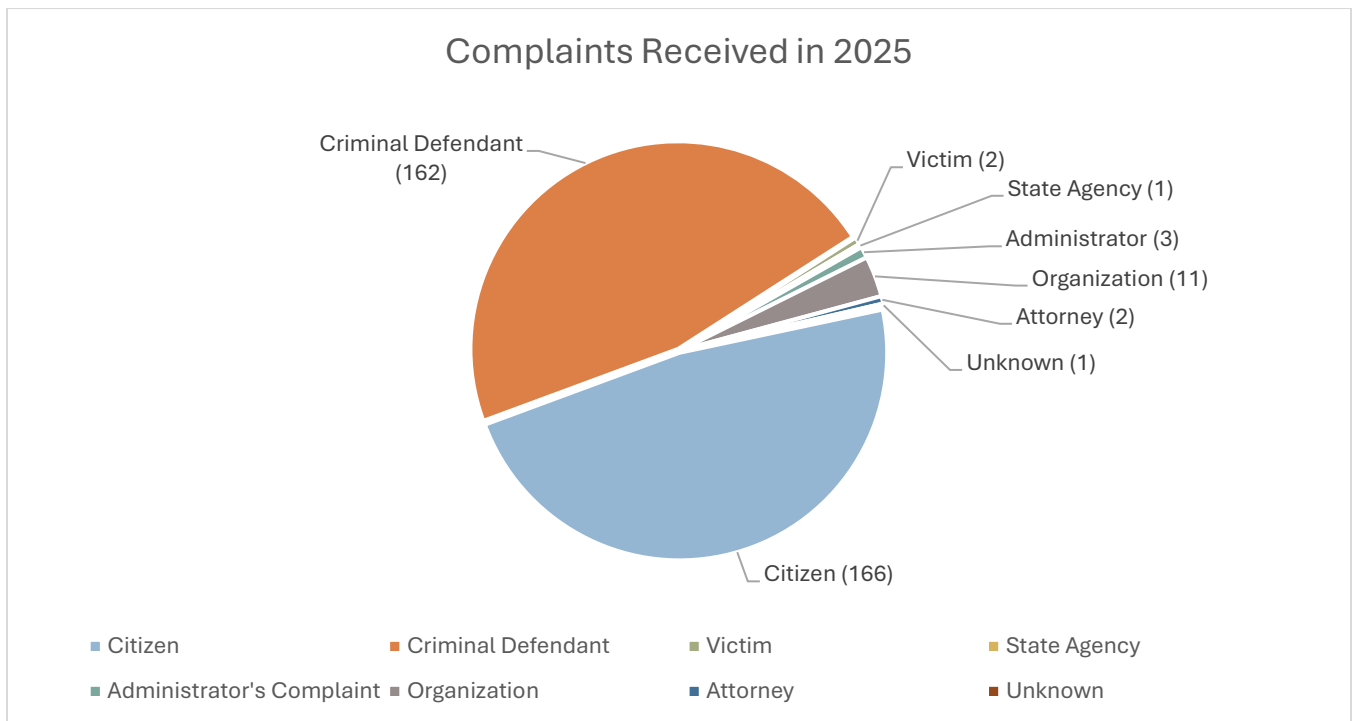
- 75 complaints involving 70 prosecutors were dismissed
- 12 complaints involving 10<sup>4</sup> prosecutors were authorized for investigation
- 1 formal written complaint involving 1 prosecutor was authorized
- 1 recommendation for public censure involving 1 prosecutor was publicly released

Of the 348 complaints received in **2025**, the following dispositions were issued by the Commission in response to 82 preliminary reports.

- 76 complaints involving 38 prosecutors were dismissed
- 6 complaints involving 6 prosecutors were authorized for investigation

As of December 31, 2025, the Commission had 15 active investigations.

## 2. Sources of Complaints Received in 2025<sup>5</sup>



<sup>2</sup> The agency's 2025 annual report previously reported receiving 142 complaints in 2024. Eleven of those complaints have since been recategorized as incomplete.

<sup>3</sup> In 2024, when the only staff member was the Administrator, 1 complaint was authorized for investigation. The remaining complaints were dismissed or authorized for investigation in the following calendar year of 2025.

<sup>4</sup> Allegations for two of the prosecutors were filed by two separate complainants related to the same conduct.

<sup>5</sup> An Administrator's complaint refers to a complaint initiated by the Commission pursuant to Judiciary Law § 499-f(2).

### 3. *Types of Misconduct Alleged in 2024 and 2025*

<b>Allegation Category</b>	<b>2024</b>	<b>2025</b>
Abuse of Discretion	15	120
Corruption	66	16
Non-jurisdictional <sup>6</sup>	0	66
Constitutional Violation: Due Process Clause (e.g., <i>Brady</i> , <i>Giglio</i> )	23	49
Misrepresentation to the Court	3	47
Tampering with Evidence	0	27
Abuse of Power	4	21
Constitutional Violation: 6 <sup>th</sup> Amendment (e.g., <i>Batson</i> , bias)	5	17
Trial Conduct	15	4
Miscellaneous	0	14
Constitutional Violation: Due Process Clause (false evidence, perjury, <i>Napue</i> )	4	12
Grand Jury Misconduct	5	11
Constitutional Violation: Equal Protection and 8 <sup>th</sup> Amendment	0	11
State Law Violation	0	11
Conflict of Interest	2	8
Retaliation	0	8
Harassment	0	1

#### **B. Formal Written Complaints and Recommendations**

As of December 31, 2025, the Commission had authorized one formal complaint involving one prosecutor; this matter was concluded with the Commission’s formal opinion accepting an Agreed Statement of Facts and Recommendation between the Administrator and counsel for the respondent prosecutor. The full text can be found in Appendix C; a summary is provided below.

#### ***Matter of Sandra Doorley***

On June 26, 2025, the Commission determined that Sandra J. Doorley, then District Attorney of Monroe County, had engaged in violations of the Rules of Professional Conduct and should be censured. In April 2024, DA Doorley was spotted driving 55-mph in a 35-mph zone by an officer of the Webster Police Department. She did not pull over when the officer indicated that she should and instead continued driving while calling the Webster Police Chief. The officer followed DA Doorley to her home, where he instructed her to remain in her vehicle. DA Doorley did not comply with the officer’s instructions, instead arguing with the officer, calling

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<sup>6</sup> Non-jurisdictional complaints refer to complaints that do not relate to District Attorneys or Assistant District Attorneys (e.g., they relate to workplace disputes, police, judges).

him an “asshole,” and making multiple references to her position as a public official. When DA Doorley issued a written public statement admitting to the speeding, she omitted key details about her conduct. In its determination, the Commission noted DA Doorley’s expressed regret for her behavior, self-report to the attorney grievance committee, and cooperation with the CPC’s investigation. DA Doorley resigned from her post on August 31, 2025.

**C. Referrals to Other Agencies**

The Commission may refer complaints and complainants to other agencies. As of December 31, 2025, the Commission referred one matter to another state agency.

**IV. The Commission’s Budget**

For the 2025-26 fiscal year, the Commission operates on a \$3,000,000 budget.

Fiscal Year	Annual Budget	New Complaints	Prelim. Reports	Investigations	Public Dispositions	Full-Time Staff
24-25	\$1.75M	131	1	1	0	1 <sup>7</sup>
25-26	\$3M	348	168	17	1	8

**V. Conclusion**

The Commission experienced significant growth in 2025. During this year the agency took critical steps to build its infrastructure and increase its capacity to review complaints. Despite having a small staff, the Commission was able to respond to 66.4% of complaints submitted in 2024 and 23.6% of complaints submitted in 2025. The Commission will continue to build the agency to ensure that it can review and adjudicate complaints fairly.

The Commission deeply values and appreciates all the state agencies – from the Office of General Services, State Comptroller’s Office, Information Technology Services, the Executive Chamber, and more – that have been so pivotal in expanding the Commission’s capacity in pursuing its mission.

The Commission looks forward to continuing to serve the people of the State of New York.

Respectfully submitted,  
**MICHAEL A. SIMONS, ESQ., CHAIR**  
**HON. MICHAEL J. OBUS, VICE CHAIR**  
**DANIEL R. ALONSO, ESQ.**  
**MAYO BARTLETT, ESQ.**  
**CHANTELLE C. BOTTICELLI, ESQ.**  
**HON. STEPHEN J. DOUGHERTY**  
**HON. RANDALL T. ENG**  
**BRIAN J. GRIFFIN, ESQ.**  
**MARNE L. LENOX, ESQ.**  
**ANDREA GLENN LOIGMAN, ESQ.**  
**AMY B. MARION, ESQ.**

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<sup>7</sup> The only staff member this year was the Administrator who was appointed in March.

***Appendix A: Biographies of Commission Members***

Per Judiciary Law § 499-c, the Commission shall consist of eleven members, of whom four shall be appointed by the governor, one by the temporary president of the senate, one by the minority leader of the senate, one by the speaker of the assembly, one by the minority leader of the assembly and three by the chief judge of the court of appeals.

<b>Member</b>	<b>Appointing Authority</b>	<b>Term Expiration</b>
Michael A. Simons	Chief Judge Rowan D. Wilson	12/11/2027
Michael J. Obus	Chief Judge Rowan D. Wilson	12/11/2028
Daniel R. Alonso	Governor Kathy Hochul	5/31/2026
Mayo Bartlett	Temporary President of the Senate Andrea Stewart-Cousins	1/6/2029
Chantelle C. Botticelli	Governor Kathy Hochul	Reappointment pending
Hon. Stephen J. Dougherty	Minority Leader of the Assembly William A. Barclay	2/15/2029
Hon. Randall T. Eng	Chief Judge Rowan D. Wilson	12/12/2029
Brian J. Griffin	Minority Leader of the Senate Robert G. Ort	5/1/2026
Marne L. Lenox	Governor Kathy Hochul	10/10/2026
Andrea Glenn Loigman	Governor Kathy Hochul	9/20/2026
Amy B. Marion	Assembly Speaker Carl Heastie	7/27/2029

**Michael A. Simons**, *Chair of the Commission*, is the John V. Brennan Professor of Law and Ethics at St. John’s University School of Law, where he teaches criminal law and evidence. A magna cum laude graduate of both the College of the Holy Cross and Harvard Law School, where he was an editor of the Harvard Law Review, Professor Simons joined the St. John’s faculty in 1998 and served as dean of the School of Law from 2009 to 2024. Before joining academia, Professor Simons practiced law as a criminal defense attorney with the firm of Stillman, Friedman & Shaw and as a federal prosecutor with the U.S. Attorney’s Office for the Southern District of New York. He also served as a staff attorney for The Washington Post and a law clerk to a federal district judge. He has conducted numerous jury trials in the U.S. District Court for the Southern District of New York and has argued appeals in the U.S. Court of Appeals for the Second Circuit, the U.S. Court of Appeals for the District of Columbia Circuit, and the District of Columbia Court of Appeals. Professor Simons is a Senior Fellow with the Vincentian Center for Church and Society and has served as a member of both the Commission on Reimagining the Future of New York’s Courts and the New York City Mayor’s Advisory Committee on the Judiciary.

**Honorable Michael J. Obus**, *Vice Chair of the Commission*, is a retired Justice of the Supreme Court of the State of New York. After graduating from Rutgers University in 1970 and from the Columbia University School of Law in 1973, he was employed as an attorney with The Legal Aid Society of Nassau County, N.Y., where he was the Chief of the Appeals Bureau from 1979 to

1986. In August of 1986 he was appointed by Mayor Edward I. Koch to be a Judge of the Criminal Court of the City of New York, where he served in Bronx and New York Counties. Thereafter, from 1992 until his retirement in December of 2020, Justice Obus sat in the Criminal Term of Supreme Court for New York County, handling thousands of felony cases and hundreds of jury trials. He was the Administrative Judge of that Court for eight years. He is currently a member of the New York State Unified Court System Committee on Criminal Jury Instructions, Model Colloquies, and Evidence Rules.

**Daniel R. Alonso** is a Shareholder in the New York office of Vedder Price P.C., where he handles white collar defense and corporate investigations, with a special focus on cross-border matters in Latin America. Mr. Alonso began his career as an Assistant District Attorney in Manhattan, where he investigated and prosecuted cases of fraud and corruption. He later became an Assistant U.S. Attorney in the Eastern District of New York, where he rose to the position of Chief of the Criminal Division. After a stint in private practice, Mr. Alonso returned to the Manhattan District Attorney's Office in 2010 as the Chief Assistant District Attorney during the first term of District Attorney Cyrus R. Vance, Jr. He later served as General Counsel of the global risk and compliance firm Exiger before returning to private practice in 2020. From 1995-96, Mr. Alonso was a law clerk to the Honorable Joseph R. Bellacosa of the New York State Court of Appeals. In addition to his law practice, Mr. Alonso has served as Chair of the Council on Criminal Justice of the New York City Bar Association, Co-Chair of the New York State White Collar Crime Task Force, President of the New York American Inn of Court, and is currently a member of the New York State Bar Association Committee on Standards of Attorney Conduct. Previously, he was a member of the Grievance Committee for the First Department. Mr. Alonso is also an Adjunct Professor at Cornell Law School, where he teaches a seminar titled, "Transnational Corruption and the Law."

**Mayo Bartlett** is the Principal Attorney at the Law Offices of Mayo Bartlett, PLLC. He worked for the Westchester County District Attorney's Office for more than ten years, serving as a litigator in the Superior Court Trial Division and Chief of the Bias Crimes Unit. He is a co-founder of SAFE PASSAGE, a youth law forum that brings issues of law and policy to the classroom. Mr. Bartlett serves as a Director of the New York State Civil Liberties Union, and Hudson Link. He is a member of the White Plains – Greenburgh NAACP, and a Director of the Urban League of Westchester. Mr. Bartlett serves as Co-Chair of the Westchester County Police Reform and Reimagining Task Force, and he works with the Westchester County Human Rights Commission addressing acts of hate and discrimination. Previously, Mr. Bartlett was a member of the Advisory Board of the Westchester Holocaust Education Center, assisting the Center in the development of a Juvenile Hate Crime Offender Program. Mr. Bartlett was an active member of the New York State Hate Crimes Coalition in support of passage of the Hate Crime Act of 2000, the first comprehensive hate crime legislation in New York State. He is a former Vice President and Director of the Westchester County Bar Association, where he served as Co-chair of the Criminal Justice Section, as a member of the Judiciary Committee, and as a delegate to the New

York State Bar Association. Mr. Bartlett is a former Director of the Westchester County Black Bar Association, and former Chair of the Westchester County Human Rights Commission.

**Chantelle C. Botticelli** is a nationally recognized subject-matter expert in Title IX and related fields. Before becoming Senior Director of Business Development at Grand River Solutions, she served as Director of Strategic Partnerships and Client Relations for the Northeast Region. She has more than 15 years of experience in the investigation and adjudication of sexual and interpersonal violence. She lectures extensively at universities and conferences throughout the U.S. on Title IX, VAWA, harassment, and implementation of best and emerging practices. Prior to joining Grand River Solutions, Chantelle served as the Director for Institutional Equity and Title IX at Cornell University. Prior to that, she served as the Assistant Vice President for Equity and Compliance and Title IX Coordinator at the University at Albany. In these roles, she provided direct, hands-on experience in the fields of Title IX, civil rights, employment law, and workplace and academic investigations. Her responsibilities included focusing on diversity efforts, sexual assault prevention and training, affirmative action, and protecting minors on campus. Ms. Botticelli spent the first decade of her career as an Assistant District Attorney assigned exclusively to the prosecution of sexual assault, intimate partner violence, stalking, and crimes against children. While in that role, Ms. Botticelli developed an expertise in trauma-informed interviewing practices and investigation techniques. Ms. Botticelli is an adjunct faculty member at Albany Law School and has also served on the faculty for National Center for Campus Public Safety and at Cornell Law School. Ms. Botticelli received her B.A. from Binghamton University and her J.D. from Albany Law School.

**Honorable Stephen J. Dougherty** is a graduate of the University of Texas (B.S.W. 1981) and Albany Law School (J.D. 1986). He prosecuted criminal cases for 13 years in the Albany County and the Onondaga County District Attorney's Offices. During his time in the Onondaga County D.A.'s Office, he was promoted to Chief Assistant D.A. and supervised both the Felony Trial and Homicide Bureaus. He prosecuted a total of 50 felony trials to verdict, including 25 homicide trials. In 2002, he was elected to Syracuse City Court. At the direction of then NYS Chief Judge Judith Kaye, Judge Dougherty created and implemented the Domestic Violence (DV) Part of Syracuse City Court in 2004. Judge Dougherty presided over the DV Part for 12 years and handled approximately 1,200 misdemeanor and felony cases each year. Judge Dougherty is frequently asked for his expertise regarding DV issues and has provided his insight to court personnel throughout New York and in other states as well. Judge Dougherty also created and implemented an Adolescent Diversion Part (ADP) in Syracuse City Court and the first Animal Cruelty Court in New York State. Judge Dougherty was re-elected, without opposition, in 2012. He was promoted to Supervising City Court Judge in 2014. He was elected to Onondaga County Court in 2016 and presided over 70 felony trials, retiring in 2022. Judge Dougherty currently is a consultant with the Onondaga County D.A.'s Office mentoring young attorneys. Judge Dougherty is a frequent lecturer on a variety of topics pertaining to the legal profession. He has spoken at Syracuse University College of Law, Colgate University, the New York State Judicial

Training Institute and at national seminars. Judge Dougherty has served on various community boards. He resides in Syracuse with his wife, Mary, and has three grown children.

**Honorable Randall T. Eng** is of Counsel to Meyer, Suozzi, English & Klein, P.C., and a member of the Litigation Department, including the Appellate Practice and Criminal Defense groups. He also serves as referee, receiver and arbitrator. Immediately prior to joining Meyer Suozzi, Justice Eng served as the Presiding Justice of the Appellate Division, Second Department. Justice Eng was raised in Queens earning his undergraduate degree from SUNY Buffalo and his juris doctor from St. John's University School of Law in 1972. Justice Eng's legal career began in public service as an assistant district attorney in Queens County. He became the first Asian American appointed as an ADA in New York State history, and serving from 1973-1980. In 1983, Justice Eng became the first Asian American judge in New York State. He was appointed to the New York City Criminal Court. He was elected to the Supreme Court in 1990 and designated to the Appellate Division in 2008.

**Brian J. Griffin** concentrates his practice of law in the areas of criminal defense at the state and federal level. A graduate of the University of Scranton and Brooklyn Law School, he began his career as an Assistant District Attorney at the Nassau County District Attorney's Office. At the DA's office he tried numerous cases to verdict at the misdemeanor and felony level. Mr. Griffin was also appointed as a Special Prosecutor for the Suffolk County District Attorney's Office. In 1997, Mr. Griffin left the DA's office and established the litigation law firm of Foley Griffin, LLP which provides both civil and criminal representation. Mr. Griffin oversees the Criminal Defense division of the firm. Mr. Griffin is a Past President and current Member of the Nassau County Criminal Courts Bar Association. He is also a Member of the Nassau County Bar Association where he is the current Chair of the Criminal Law and Procedure Committee. Mr. Griffin is admitted to practice law in New York State as well as the Southern and Eastern Districts of New York.

**Marne L. Lenox** is an Assistant Federal Defender with the Federal Defenders of New York, Inc. in the Southern District of New York. She co-teaches the Federal Defender Clinic at NYU School of Law, where she supervises students handling petty offense cases in the Eastern District of New York. Before joining the Federal Defenders, Ms. Lenox worked as an Assistant Counsel at the NAACP Legal Defense Fund. She practiced law as a Criminal Defense Practice Staff Attorney at the Bronx Defenders. Ms. Lenox received her J.D. from New York University School of Law, where she was a Root-Tilden-Kern Scholar and served as a Notes Editor for the NYU Law Review. Ms. Lenox received her undergraduate degree from Brown University, where she concentrated in both Public Policy and Africana Studies. She is a member of the New York State Bar and admitted to practice in the Southern and Eastern Districts of New York.

**Andrea Glenn Loigman** is a Supervisory Attorney for the Assigned Counsel Plan-Second Department under the New York City Mayor's Office of Criminal Justice. She began her career at Mental Hygiene Legal Services in the Bellevue Hospital office, practiced ten years in the Bronx

for the Legal Aid Society's Criminal Defense Division, and advocated for preschool through grade 12 students in special education matters for the Children's Unit at Legal Services of the Hudson Valley. She then joined the Legal Aid Society of Westchester County as a Supervising Attorney for the inaugural Assigned Counsel Mentorship Program sponsored by LAS' Assigned Counsel Division (ACD), New York state's Indigent Legal Services (ILS) and the National Legal Aid and Defender Association (NLADA). She ultimately became Deputy Chief Administrator for LAS' ACD pre-pandemic where she helped administer the 18B program for both family and criminal mandated representation. Ms. Glenn Loigman additionally practiced in Westchester County's three family courts as part of LAS' Family Court Division from August 2020 until February 2023. Before joining the ACP, Ms. Glenn Loigman served on the Westchester County Bar Association's Task Force on Attorney Well-Being and the Post-COVID Practice of Law and was an inaugural member of ILS' Parent Representation Advisory Council. A published freelance writer, she holds an M.S. from Columbia University's Graduate School of Journalism, her J.D. from New York Law School, and a B.A. from New York University.

**Amy B. Marion** is a Partner with Abrams Fensterman, Fensterman, LLP. She focuses her practice on human rights, specializing in litigation involving deprivation of constitutional rights, whether by criminal investigations and prosecutions, due process or First Amendment violations, wrongful death claims, or commercial, corporate, property, estate, or regulatory disputes. Ms. Marion's legal career began in the Criminal Defense Division of the New York City Legal Aid Society. In 2005, Ms. Marion became Principal Law Clerk to the Honorable Tammy S. Robbins, Nassau County Court Judge. Prior to joining the firm, Ms. Marion was a founding partner and head of the civil rights and civil practice group of a Long Island firm. Ms. Marion has over 35 years of experience representing individuals in civil and criminal investigations and prosecutions in both federal and state courts. She has tried to verdict a multitude of felony cases including attempted homicide and narcotics cases. She has defended clients in investigations, trials and appeals of false arrest, malicious prosecution and excessive force claims. In addition, Ms. Marion has extensive experience in cases involving domestic violence and abuse and litigation in both Family and Criminal Court. She has successfully litigated discrimination cases against several large municipalities and corporations; has obtained multi-million dollar settlements in wrongful conviction cases; successfully tried and defended one of the state's first Child Victims Act (CVA) trials; and has successfully established actual innocence in litigation brought pursuant to Criminal Procedure Law § 440.

## New York State Commission on Prosecutorial Conduct

### Operating Rules and Procedures

<b>Section 10400.1</b>	<b>Definitions</b>
<b>Section 10400.2</b>	<b>Processing of Complaints</b>
<b>Section 10400.3</b>	<b>Investigation Procedures</b>
<b>Section 10400.4</b>	<b>Formal Complaint Procedures</b>
<b>Section 10400.5</b>	<b>Final Disposition</b>
<b>Section 10400.6</b>	<b>Confidentiality of Records</b>
<b>Section 10400.7</b>	<b>Amending Rules</b>
<b>Section 10400.8</b>	<b>Quorum, Voting</b>
<b>Section 10400.9</b>	<b>Commission's Principal Office</b>
<b>Section 10400.10</b>	<b>Designation of Clerk of the Commission</b>

#### Section 10400.1 Definitions

For the purpose of this Part, the following terms have the following meanings:

- (a) *Administrator* shall mean an individual appointed by the commission pursuant to section 499-c, subdivision 7 of the Judiciary Law.
- (b) *Administrator's complaint* shall mean a complaint signed by the administrator at the direction of the commission.
- (c) *Answer* shall mean a written response to a formal written complaint.
- (d) *Clerk of the Commission* shall mean an individual appointed by the commission pursuant to section 10400.12 of this Part.
- (e) *Complainant* shall mean a person or entity that submits a complaint to the commission.
- (f) *Complaint* shall mean a written communication signed and, if directed by the commission, verified by the complainant, making an allegation about a prosecutor's conduct pursuant to sections 499-a and 499-f of the Judiciary Law, or an administrator's complaint.
- (g) *Commission* shall mean the New York State Commission on Prosecutorial Conduct.
- (h) *Dismissal* shall mean a decision at any stage not to proceed further with a complaint and/or formal complaint.
- (i) *Electronic copy* shall mean a digital version of a document or piece of information accessible via electronic devices, including computers, tablets, and smartphones.

- (j) *Formal written complaint* shall mean a detailed, written allegation of prosecutorial misconduct, signed and verified by the administrator, submitted to initiate a hearing concerning the prosecutor's conduct.
- (k) *Hearing* shall mean a proceeding under section 499-f, subdivision 4 of the Judiciary Law wherein the commission may take the testimony of witnesses and receive evidentiary data and material relevant to the complaint. The respondent prosecutor shall have the right to call and cross-examine witnesses and present evidence and material relevant to the complaint.
- (l) *Initial review and inquiry* shall mean the first stage of the commission's process, in which the commission staff may engage in preliminary analysis and fact-finding to aid the commission in determining whether to authorize an investigation.
- (m) *Investigation* shall mean an examination of a specific complaint and/or the prosecutor's conduct, including the collection and analysis of relevant evidence, testimony under oath or affirmation, and documentation, conducted by the commission or its staff. An investigation shall only be initiated at the direction of the commission.
- (n) *Prosecutor* shall mean a district attorney or any assistant district attorney of any county of the State in an action to exact any criminal penalty, fine, sanction or forfeiture.
- (o) *Referee* shall mean an individual appointed by the commission pursuant to section 499-e, subdivision 2 of the Judiciary Law.
- (p) *Respondent* shall mean the individual against whom a formal written complaint has been filed with the commission.
- (q) *Virtual or virtually* shall be used to refer to commission proceedings conducted with two-way videoconferencing that permits all parties to simultaneously hear and observe other participants.

#### **Section 10400.2 Processing of Complaints**

- (a) The commission shall receive complaints against any prosecutor with respect to the prosecutor's conduct or the performance of the prosecutor's official duties.
- (b) A complaint shall be in writing, signed by the complainant, and , if directed by the commission, verified by the complainant.
- (c) The commission staff may engage in an initial review and inquiry of the complaint and shall provide a recommendation to the commission about the disposition of a complaint.
- (d) Upon receipt of a recommendation from commission staff, the commission shall (1) authorize an investigation of the complaint; or (2) dismiss the complaint if it determines that the complaint lacks merit.

- (e) If a complaint is initiated by the commission, the commission shall file as part of its records an administrator's complaint.

### **Section 10400.3 Investigation Procedures**

- (a) An investigation shall only be authorized by the commission.
- (b) Notice of Investigation. Upon receipt of a complaint or after an initial review and inquiry, the commission may initiate an investigation into the prosecutor's conduct. The prosecutor shall be notified in writing of the commencement of the investigation and provided with a copy of the complaint.
- (c) Party Participation. The prosecutor shall have the right to be represented by counsel during any and all stages of the investigation. The prosecutor or their counsel may present evidentiary data and material relevant to the complaint, through submission of such data and material, by making an oral statement, or both.
- (d) Evidence Collection. The administrator or a member of the commission may subpoena witnesses, compel their attendance, and require the production of any books, records, documents, or other evidence that may be deemed relevant or material to the investigation and/or the complaint. Either party may request that the commission seek a court order to access materials that are prohibited by statute from disclosure. The commission may authorize any member of its staff to administer oaths or affirmations and examine witnesses under oath. A witness required to appear before the commission shall have the right to be represented by counsel who may be present with the witness and advise the witness, but may not otherwise participate in the proceedings.
- (e) Criminal Investigations. The prosecuting agency may inform the commission by affirmation, with specificity and particularity in writing to the administrator, of its position that the commission's investigations will substantially interfere with the agency's own criminal investigation.
- (f) Appearance of the Prosecutor. The commission may require the appearance of the prosecutor involved before it, in which event the prosecutor shall be notified in writing of the required appearance, either personally, at least 10 days prior to such appearance, or by certified mail, return receipt requested, at least 14 days prior to such appearance. A copy of the complaint shall be served upon the prosecutor at the time of such notification. A prosecutor's appearance during an investigation shall take place at a commission office, or if the commission so directs, may be conducted virtually; and at least one member of the commission or referee designated by the commission shall be physically or virtually present. Failure to appear may be deemed an admission unless the prosecutor provides good cause for failing to appear. Electronic copies of the transcripts shall be made available to the prosecutor without cost.

- (g) Recording and Transcribing. All interviews pursuant to a subpoena shall be recorded and transcribed.
- (h) Report. Upon completion of the investigation, the administrator or administrator's designee shall prepare a report detailing its findings, conclusions, and any recommendations for further action.
- (i) Disposition. Based on the report, the commission may dismiss the complaint, direct further investigation, request a written response from the prosecutor, direct the filing of a formal written complaint, or take any other action authorized by law.

#### **Section 10400.4 Formal Complaint Procedures**

- (a) Applicable Law. If the commission determines that a hearing is warranted it shall direct that a formal written complaint signed and verified by the administrator be filed. Section 499-f, subdivision 4 of the Judiciary Law provides the procedures to be followed for a hearing.
- (b) Notice. A formal written complaint signed and verified by the administrator will be drawn and served upon the respondent prosecutor involved, either personally or by certified mail, return receipt requested.
- (c) Answer. The respondent prosecutor shall file a written answer to the formal written complaint with the commission within 20 days of such service or seek an extension for good cause within 20 days of service. The answer shall contain a response which corresponds to each allegation and sets forth that the allegation is either denied, admitted, known or believed to be untrue, or is an allegation about which the prosecutor lacks knowledge or information sufficient to form a belief. The respondent prosecutor's answer may also contain defenses, may assert that the alleged conduct in the formal complaint is not improper or unethical, and provide any additional information relevant to the alleged conduct. Failure to answer the formal written complaint or address specific factual allegations shall be deemed an admission of its allegations.
- (d) Summary determination. The respondent prosecutor may move before the commission for a summary determination upon all or any part of the issues being adjudicated, if the pleadings, and any supplementary materials, show that there is no genuine issue as to any material fact and that the respondent prosecutor is entitled to such decision as a matter of law. A motion for summary determination may be served in the same manner as a formal written complaint. If a motion for summary determination is filed, the commission shall provide reasonable opportunity for the submission of briefs and oral argument.
- (e) Agreed statement of facts. Subject to the approval of the commission, the administrator and the respondent prosecutor may agree on a statement of facts and may stipulate in writing that the hearing shall be waived. In such a case, the commission shall rely upon the agreed statement of facts in forming the commission's findings of facts.

(f) Subpoenas. The commission or referee designated by the commission is empowered to issue subpoenas for a commission hearing pursuant to a formal written complaint. If the administrator or the respondent prosecutor who is the subject of a formal written complaint wishes to subpoena a witness or books, records, documents, or other evidence, a request must be made to the referee with notice to the opposing side, affording a reasonable opportunity to be heard. The referee shall grant reasonable requests for subpoenas.

(g) Motions.

(1) The commission shall decide the following motions:

- i) a motion for summary determination;
- ii) a motion to dismiss a formal written complaint or any portion thereof;
- iii) a motion to confirm or disaffirm the findings of the referee;
- iv) a motion made prior to the appointment of the referee, except that the commission may refer such motion to the referee when such referral is not inconsistent with the other provisions of this section; and
- v) a motion to alter an action taken or order issued by the commission.

(2) The referee designated by the commission shall decide all other motions.

(3) In deciding a motion, the commission members shall not have the aid or advice of the administrator or commission staff who has been engaged in any stage of the investigation.

(4) Within 10 days of the parties being notified of the designation of the referee, commission counsel or the respondent prosecutor may file a motion to disqualify a referee based on a conflict of interest or bias. The opposing party must respond to the motion within 10 days of service of the motion. After 10 days of being notified, the parties may seek to file a motion to disqualify a referee for good cause.

(5) The respondent prosecutor may file a motion for reconsideration of a commission determination. The respondent prosecutor must demonstrate that (i) the new evidence could not have been discovered with due diligence at the time of the hearing and (ii) would have resulted in a different outcome. The commission reserves the authority to hold a hearing to evaluate the newly discovered evidence.

(6) Moving parties shall obtain a motion schedule from the clerk of the commission for all motions to be decided by the commission.

(h) Hearing. If, upon receipt of the answer, or upon expiration of the time to answer, the commission shall direct that a hearing be held with respect to the complaint, the respondent prosecutor involved shall be notified in writing of the date of the hearing

either personally, at least 20 days prior thereto, or by certified mail, return receipt requested, at least 22 days prior thereto. The respondent prosecutor has the right to be present for the hearing. If the respondent prosecutor fails to appear, the hearing shall continue in their absence. Hearings shall be held at a commission office or such other place as the parties and referee may agree or the clerk of the commission shall direct. The commission may require that any hearing be conducted virtually and may issue public protocols for determining when and how such a virtual hearing should be conducted. The referee shall set a hearing date, regulate the course of the hearing, make appropriate rulings, set the time and place for adjourned or continued hearings, and shall have such authority as specified by the commission pursuant to section 499-e, subdivision 2 of the Judiciary Law.

(i) Discovery.

(1) Upon written request of the respondent prosecutor, the administrator shall, at least 10 days prior to the hearing or any adjourned date thereof, make available to the respondent prosecutor without cost electronic copies of all documents which the administrator intends to present at such hearing, a list of the witnesses administrator intends to call to give testimony and any written statements made by witnesses who will be called to give testimony. The administrator shall, in any case, make available to the respondent prosecutor at least 10 days prior to the hearing or any adjourned date thereof any exculpatory evidentiary data and material relevant to the complaint, whether or not written or recorded. Exculpatory evidentiary data and material relevant to the complaint includes impeachment material. The failure of the commission to timely furnish any documents, statements and/or exculpatory evidentiary data and material provided for herein shall not affect the validity of any proceedings before the commission provided that such failure is not substantially prejudicial to the respondent prosecutor. If the referee determines that the failure was substantially prejudicial to the respondent prosecutor, the referee may adjourn the hearing and take any other action deemed necessary to cure the substantial prejudice.

(2) Upon the written request of the administrator, the respondent prosecutor shall, at least five days prior to the hearing or any adjourned date thereof, make available to the administrator without cost electronic copies of all documents that prosecutor intends to present at such hearing, a list of the witnesses the respondent prosecutor intends to call to give testimony and any written statements of witnesses who will be called to give testimony by respondent prosecutor, with the exception of prior statements of the respondent prosecutor.

(3) Either party may seek an adjournment if additional time is needed to review discovery. The request for adjournment must be made seven days prior to the hearing.

(j) Burden of Proof. The administrator or administrator's designee has the burden of proving, by a preponderance of the evidence, the facts justifying a finding of misconduct.

(k) Rules of Evidence. The rules of evidence applicable in New York courts shall be followed.

- (l) Complainant. The complainant may be notified of the hearing and unless they are subpoenaed as a witness by the prosecutor, their presence thereat shall be within the discretion of the commission.
- (m) Right to Counsel. The respondent prosecutor shall have the right to be represented by counsel during any and all stages of the hearing and shall have the right to call and cross-examine witnesses and present evidentiary data and material relevant to the complaint.
- (n) Recording and Transcription. A recording of the proceedings and of the testimony of witnesses at the hearing shall be taken and transcribed. The recording and transcription shall be kept with the records of the commission. An electronic copy of the transcript will be made available, without cost, to the respondent prosecutor.
- (o) The hearing shall not be public unless the respondent prosecutor involved shall so demand in writing.
- (p) The parties shall be afforded an opportunity to submit post-hearing briefs on issues of fact and law, including proposed findings, within 30 days after their receipt of the transcript of the hearing to the referee. For good cause, the referee may grant a reasonable extension. The referee shall set dates for service and filing of briefs and proposed findings that shall be served electronically.
- (q) The referee shall submit a report to the commission with proposed findings of fact and conclusions of law. No recommendation shall be made with respect to a sanction to be imposed by the commission. The referee shall submit such report no later than 30 days after receipt of post-hearing briefs and proposed findings from the parties or no later than 30 days after failure of the respondent prosecutor or the administrator to file such briefing. The clerk of the commission may grant reasonable extensions of time for the referee's report. The parties shall receive an electronic copy of the referee's report.
- (r) The commission shall consider the referee's report or agreed statement of facts and shall provide reasonable opportunity for the submission of briefs and oral argument with respect to such report or agreed statement of facts and with respect to possible sanctions. The commission may require that the oral argument be conducted virtually. The administrator and respondent prosecutor shall each serve and file an electronic copy of their brief to the commission via email or by such other means as the commission may direct.

#### **Section 10400.5 Final Disposition**

- (a) After the hearing, the commission may take appropriate action, ranging from dismissal of the complaint to recommending any measures available to the New York State Attorney Grievance Committees.
- (b) The commission shall transmit its findings of fact and recommendations and the record of the proceedings upon which such findings and recommendations are based, to the attorney grievance committee of the appellate division in the department where the

prosecutor was admitted to practice, which shall cause a copy thereof to be served either personally or by certified mail, return receipt requested, on the prosecutor involved.

- (c) Upon completion of service, the commission's findings and recommendations and the record of its proceedings shall be made available for public inspection at the principal office of the commission, at the office of the clerk of the appellate division in the department in which the record was filed, and online through the commission's website.
- (d) If the commission's findings and recommendations include any recommendation that a district attorney should be removed or retired, the commission shall simultaneously transmit its findings, recommendations, and record of its proceedings to the governor. If the commission's findings and recommendations include any recommendation that an assistant district attorney should be removed or retired, the commission shall simultaneously transmit its findings, recommendations, and record of its proceedings to the district attorney under whom such assistant district attorney serves.
- (e) Records of a prosecuting agency provided by the agency to the commission pursuant to the Judiciary Law shall not be subject to disclosure by the commission under article 6 of the Public Officers Law.
- (f) Dismissal. The commission may dismiss the complaint if it determines there is insufficient evidence to support the allegations, if the administrator or administrator's designee has not carried its burden of proof, or for other justifiable reasons.
- (g) If during the course of or after an investigation or hearing, the commission determines that the complaint or any allegation thereof warrants action, other than in accordance with sections 499-f, subdivisions 7-8 of the Judiciary Law, the commission shall refer such complaint or the appropriate allegations thereof and any evidence or material related thereto to such person, agency or court for such action as may be deemed proper or necessary.
- (h) The commission shall notify the complainant of its disposition of the complaint.

#### **Section 10400.6 Confidentiality of Records**

The confidentiality of the commission's records shall be governed by section 499-g of the Judiciary Law. Disciplining staff for breaches of confidentiality shall be governed by procedures set forth in section 499-h of the Judiciary Law.

#### **Section 10400.7 Amending Rules**

The rules of the commission may be amended with the concurrence of at least six members.

### **Section 10400.8 Quorum, Voting**

Eight members of the commission shall constitute a quorum of the commission and the concurrence of six members of the commission shall be necessary. Two members of a three-member panel of the commission, as defined in section 499-e of the Judiciary Law, shall constitute a quorum of the panel and the concurrence of two members of the panel shall be necessary for any action taken.

### **Section 10400.9 Commission's Principal Office**

The commission's principal office shall be its New York City office.

### **Section 10400.10 Designation of Clerk of the Commission**

The commission shall designate a clerk of the commission who shall be a member of the bar of the State of New York. The clerk shall not participate in the investigation or in an adversarial capacity in any matter before the commission. The clerk shall assist the commission in all matters concerning its consideration of formal charges. The clerk shall serve as the commission's liaison to referees appointed pursuant to section 499-e of the Judiciary Law; shall correspond on behalf of the commission with attorneys with matters before the commission, including the administrator; shall schedule oral matters before the commission; shall assist the commission in the preparation of determinations and orders and shall transmit the record of matters to the appropriate entity pursuant to sections 499-f, subdivisions 7-8 of the Judiciary Law. The clerk shall advise complainants of the commission's disposition of the complaints pursuant to section 499-f, subdivision 10 of the Judiciary Law. The clerk shall perform such additional duties as may be assigned by the commission. The clerk shall serve at the pleasure of the commission and the terms and conditions of employment shall be established by the commission.

STATE OF NEW YORK  
COMMISSION ON PROSECUTORIAL CONDUCT

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In the Matter of the Proceeding  
Pursuant to Section 499-f, subdivision 4,  
Of the Judiciary Law in Relation to

**SANDRA J. DOORLEY**

FINDINGS OF FACT  
AND RECOMMENDATION

the District Attorney of Monroe County.  
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THE COMMISSION:

Michael A. Simons, Chair  
Michael J. Obus, Vice Chair  
Daniel R. Alonso  
Mayo Bartlett  
Chantelle C. Botticelli  
Stephen J. Dougherty  
Randall T. Eng  
Brian J. Griffin  
Marne Lenox  
Andrea Glenn Loigman  
Amy B. Marion

APPEARANCES:

Susan Friedman, Administrator to the Commission, for the Commission  
  
Robert Masters, Esq., for the Respondent

The Respondent, Sandra J. Doorley, the elected District Attorney of Monroe County, was served with a Formal Written Complaint dated May 9, 2025. The complaint contained one charge, which alleged that Respondent engaged in unprofessional conduct in violation of the New York Rules of Professional Conduct, 22 NYCRR 1200, in connection with a lawful traffic stop on April 22, 2024. Specifically, the complaint alleged that Respondent failed to comply with a lawful traffic stop and used the power of her office as District Attorney for her own benefit and was belligerent and hostile towards the patrol officer when she: (A) refused to comply with a

lawful order to stop her vehicle pursuant to a traffic stop; (B) called the Chief of the Webster Police to seek special treatment; (C) failed to follow the police officer's directives; (D) made repeated references to her position as the District Attorney of Monroe County; (E) was hostile to the police officer, who was effectuating the lawful stop, and repeatedly used profanity towards him; and (F) made a public statement that contained material omissions about her conduct and interactions with law enforcement.

On June 23, 2025, the Administrator and Respondent entered into an Agreed Statement of Facts pursuant to Judiciary Law § 499-f(5), stipulating that the Commission make its determination based upon the agreed facts, recommending that Respondent be publicly censured, and waiving further submissions and oral argument.

On June 26, 2025, the Commission approved the Agreed Statement of Facts and made the following determination:

1. Respondent was admitted to the practice of law in New York in 1989. She has served as the elected District Attorney of Monroe County since January 2012.
2. Respondent was served with a Formal Written Complaint dated May 9, 2025. She entered into this Agreed Statement of Facts in lieu of filing an Answer.

**As to Charge I**

3. On April 22, 2024, Respondent was operating her vehicle when she failed to comply with a lawful traffic stop and used the power of her office as District Attorney for her own benefit and was belligerent and hostile towards the patrol officer and engaged in the following conduct: (A) refused to comply with a lawful order to stop her vehicle pursuant to a traffic stop; (B) called the Chief of the Webster Police to seek special treatment; (C) failed to follow the police officer's directives; (D) made repeated references to her position as the District

Attorney of Monroe County; (E) was hostile to the police officer, who was effectuating the lawful stop, and repeatedly used profanity towards him; and (F) made a public statement that contained material omissions about her conduct and interactions with law enforcement.

**Specifications to Charge I**

4. On April 22, 2024, Police Officer Cameron Crisafulli, a two-year veteran of the Webster Police Department (“WPD”), was on patrol alone, in uniform, and driving marked patrol vehicle #9174. At approximately 5:40 p.m. PO Crisafulli observed a dark colored Suburban traveling at a high rate of speed on Phillips Road and determined using his radar that the vehicle was traveling 55-mph in a 35-mph zone as it approached Schlegel Road. PO Crisafulli activated his vehicle’s lights, made a U-turn to pursue the Suburban. PO Crisafulli quickly caught up to the Suburban and pulled up directly behind it with his lights activated. The Suburban did not stop, slow down, nor speed up, or make any apparent efforts to move over and instead maintained its speed of 55-mph.

5. Unknown to PO Crisafulli, the driver of the dark colored Suburban was the Respondent. Rather than acknowledging PO Crisafulli’s attempts to pull her over, Respondent instead placed a call to WPD Chief and PO Crisafulli’s boss, Dennis Kohlmeier. At approximately 5:43 p.m. Chief Kohlmeier answered the call and Respondent informed him that a marked patrol vehicle was attempting to pull her over and that she was going to drive home to speak with the officer instead of pulling over. Chief Kohlmeier said that he would find out what was going on.

6. Respondent continued to drive and failed to stop. PO Crisafulli continued to follow the dark-colored Suburban through a residential neighborhood until it turned into a

driveway and pulled into the garage of Respondent's residence located at [REDACTED] in Webster, New York.

7. Still unaware of the identity of the driver, and not familiar with the residence where the driver stopped, PO Crisafulli activated his body worn camera ("BWC"), quickly exited his vehicle, walked towards the garage, and instructed the driver to remain in the vehicle. Respondent did not comply with this instruction and instead exited the vehicle in an irate state, and stated, "Sir, I'm the DA, I was going 55 coming home from work." When PO Crisafulli stated that she was going 55 in a 35, Respondent replied, "I don't really care. So, you can call Dennis." PO Crisafulli then informed Respondent that it was a traffic stop and directed Respondent to step out of her garage and stand at the back of her vehicle, to which she replied, "You can call [Chief of Police] Dennis Kohlmeier right now." (*Get out of my f\*\*\*ing house': More RAW Video of Monroe County DA Sandra Doorley's traffic stop*, 13WHAM ABC News, <https://www.youtube.com/watch?v=R-CKdEq9mCA> (April 29, 2024) (hereinafter "BWC Footage")).

8. PO Crisafulli attempted to explain why he had pulled Respondent over and asked if she had observed his lights and sirens, to which Respondent replied that she had not, as she was on the phone.

9. At approximately 5:45 p.m., during the traffic stop and standing in her driveway, Respondent placed a second call to Chief Kohlmeier, and said:

**DA Doorley:** Can you just tell him to leave me alone. It's officer?

**Officer Crisafulli:** Officer Crisafulli. Can you stay over here, ma'am.

**DA Doorley:** No, I'm not staying over there.

**Officer Crisafulli:** This is a legal traffic stop. Do you have your ID?

**DA Doorley:** No. It's in my purse.

**Officer Crisafulli:** You have your purse right there.

**DA Doorley:** No, this is my lunch. Would you talk to your – talk to Dennis. This is ridiculous. Just go away. [DA Doorley hands phone to Officer Crisafulli.]

(Transcript of Police Officer Cameron Crisafulli's Body Worn Camera, exhibit 1, at 2-3; *see also* BWC Footage at 1:00).

10. Chief Kohlmeier heard the conversation between Respondent and the Officer and instructed PO Crisafulli to get a supervisor to the scene.

11. Respondent entered her home again and when she emerged PO Crisafulli again informed her that she could not go inside during a traffic stop, to which Respondent responded, "Yes I can, I understand the law better than you. Would you just leave me – would you just leave me alone." (Exhibit 1 at 4; *see also* BWC Footage at 2:00).

12. PO Crisafulli then returned Respondent's phone and requested a supervisor to the scene. Hearing this request, Respondent stated, "No. Get out of my fucking house." *See* (Exhibit 1 at 4; *see also* BWC Footage at 2:06).

13. PO Crisafulli expressed surprise at how Respondent was acting towards him and instructed Respondent to go to the back of her vehicle, which she refused to do. And the following exchange took place:

**DA Doorley:** I'm not going to. I'm home. I was going – I was – okay, 55.

**Officer Crisafulli:** I don't care if you got home. You were supposed to stop at Phillips Road when I pulled you over, when my lights were initiated.

**DA Doorley:** I didn't know you were stopping me. There were lots of other people on the road.

**Officer Crisafulli:** I was right behind you.

**DA Doorley:** Yeah. There were other people on the road, too.

**Officer Crisafulli:** Okay. I was directly behind you.

**DA Doorley:** I'm not dealing with you right now.

(Exhibit 1 at 4-5; *see also* BWC Footage at 2:13).

14. Respondent was aware that she was driving above the speed limit and that PO Crisafulli was attempting to effectuate a lawful traffic stop. (Exhibit 1 at 6; *see also* BWC Footage at 3:25) (Respondent explaining that while she was driving, she placed a call to Chief Kohlmeier about the officer attempting to pull her over); *see also* Deposition of DA Doorley, exhibit 2, at 11).

15. PO Crisafulli asked Respondent why she was opposed to him performing his duties:

**PO Crisafulli:** What is the reason you're so – you're so against what I am doing. I'm doing my job. You say you're a DA?

**DA Doorley:** I am the DA.

**Officer Crisafulli:** Okay.

**DA Doorley:** Okay. Let me get you my badge. I am the DA of Monroe County.

**Officer Crisafulli:** I just don't understand the hostility towards me. I'm doing my job.

**DA Doorley:** You are being an asshole.

**Officer Crisafulli:** How am I being an asshole?

**DA Doorley:** I am the DA of Monroe County.

**Officer Crisafulli:** I understand that. But that doesn't give you a right to go 55 in a 35. And you even admitted to me that you went – [DA Doorley displays badge] I understand that, ma'am.

**DA Doorley:** I don't care. I don't really care. You know what, if you give me a traffic ticket, that's fine. I'm the one who prosecutes it, okay, just go ahead and do it. Go ahead.

(Exhibit 1 at 5-6; *see also* BWC Footage at 2:38).

16. Respondent went on to say, "I thought you were going somewhere else because I thought no one would ever pull a black SUV after you ran my plates." (Exhibit 1 at 7; *see also* BWC Footage at 4:00).

17. Police Officer Lyndsay Thomas arrived moments later. The following exchange occurred:

**Officer Crisafulli:** I understand you had – like, I get it. We all have bad days at work.

**DA Doorley:** I'm just – yeah, I'm just going to go in the house. Seriously, this is ridiculous.

**Officer Crisafulli:** This is a traffic stop. And you, out of everyone, you should know that if there's a legal traffic stop, which I have, I have the right to detain you until this is done.

**DA Doorley:** Then just write me the fucking ticket. I really don't care.

**Officer Crisafulli:** Well, then just hang out at the back of the car.

**DA Doorley:** Because I'm the one that's going to prosecute myself. You know what I'll do with that ticket? Ha, ha, ha . . .

(Exhibit 1 at 10-11; *see also* BWC Footage at 6:12).

18. Shortly thereafter, Police Officer Cory Coene arrived on the scene. Upon his arrival, the Respondent, unprompted, stated “I was speeding on Phillips Road, he turned around, I didn’t know if it was me, I wasn’t sure because there were other cars going back and forth, but I got to turning into Fieldcrest, and I’m like I’m just going to drive home, that’s what I did. So that’s the end of the story. I got on the phone with Dennis, I don’t know, even before I or when I turned in and said, it’s me that they’re stopping just tell them it’s me. That’s where we are.”

(Exhibit 1 at 10-11; *see also* BWC Footage at 7:18).

19. At approximately 5:52 p.m., Respondent made a third call to Chief Kohlmeier. Respondent admitted that she had been speeding, did not want to stop on Phillips Road, and chose to drive to her house. Respondent was upset that PO Crisafulli did not recognize her vehicle. When Chief Kohlmeier explained that the officer would not know who she was based on her vehicle and that she should have pulled over, Respondent stated “he should’ve run the plate, it’s a big black SUV and now I’ve got like five cops here.” (Exhibit 1 at 10-11; *see also* BWC Footage at 8:54).

20. While Respondent was on the phone with Chief Kohlmeier, Sgt. Kevin Johnson and Lt. Jeffrey Webster arrived. Respondent informed them that she had just been on the phone with Chief Kohlmeier, and stated, “I didn’t want to pull over on Phillips Road, it was just, I just didn’t. I just figured I’d pull into my driveway. And I called Dennis, and I said that’s me that they’re trying to stop, so that’s the end of story.” (Sgt. Kevin Johnson’s BWC Footage, exhibit 3, at 1:32). When informed that the decision whether to stop was not her choice, Respondent replied, “I made it my choice.” *Id.*

21. PO Crisafulli issued Respondent a traffic ticket for a violation of New York State Vehicle and Traffic Law §1180(d), based on her traveling 55-mph in a 35-mph zone. Upon handing her the ticket, Respondent stated, “That’s fine, I’ll take care of it, since I’ll be prosecuting myself.” (Exhibit 1 at 18; *see also* BWC Footage at 24:57).

22. Three days later, on Thursday April 25, 2024, Respondent issued a written public statement that omitted material details of the traffic stop including her refusal to follow the police officer’s directives, calls to Chief Kohlmeier including asking the Chief to tell PO Crisafulli to “leave [her] alone,” repeated references to her being the District Attorney, and her hostile conduct towards PO Crisafulli. The statement read:

On Monday, April 22, 2024, I was driving home following a busy day at work. I admit that I was not paying attention to my speed on Phillips Road in the Town of Webster. Less than half a mile from my neighborhood, I noticed a Webster Police car behind me. Once I realized that the intention of the car was to pull me over, I called the Webster Police Chief to inform him that I was not a threat and that I would speak to the Officer at my house down the street. The Webster Police Officer followed me to my house and issued me a speeding ticket for my speed of 55 MPH in a 35 MPH zone. I acknowledged that I was speeding, and I accepted the ticket.

By 1:00PM the following day, I pled guilty and sent the ticket to the Webster Town Court because I believe in accepting responsibility for my actions and had no intention of using my position to receive a benefit.

Nobody, including your District Attorney, is above the rule of law, even traffic laws. Anybody who knows me understands without a doubt that I have dedicated my entire 33-year career to the safety of this community. My work to ensure the safety and respect of law enforcement is well proven time and time again. I stand by my work and stand by my commitment to the public safety of Monroe County.

23. Respondent’s conduct was investigated by the Monroe County Board of Ethics, and it concluded that Respondent violated Section 45-13.A. of the Code of Ethics of the County of Monroe. (Monroe County Ethics Board Report, exhibit 4, page 14).

**Additional Factors:**

24. Respondent reports that she regrets failing to stop during a lawful traffic stop and follow the police officer's directives, her conduct toward the police officer, engaging in conduct that created the appearance that she was using her position as District Attorney to receive special treatment, and failing to be transparent with the public about what transpired during the traffic stop. Respondent commits herself to the high standards of behavior required of all prosecutors and acknowledges that no one is above the law.

25. Respondent has expressed remorse and contrition for her behavior. Respondent cooperated with the Commission's investigation, self-reported this matter to the Grievance Committee, and has invited a public censure as the appropriate discipline for her behavior to emphasize the point of the law's equal application to everyone.

\* \* \*

Upon the foregoing findings of fact, the Commission concludes as a matter of law that Respondent engaged in illegal conduct that adversely reflects on her honesty, trustworthiness or fitness as a lawyer in violation of Rule 8.4(b) of the Rules of Professional Conduct (22 NYCRR 1200.00); engaged in conduct that is prejudicial to the administration of justice in violation of Rule 8.4(d) of the Rules of Professional Conduct (22 NYCRR 1200.00); stated or implied an ability to achieve results using means that violate the Rules of Professional Responsibility or other law in violation of Rule 8.4(e) of the Rules of Professional Conduct (22 NYCRR 1200.00); and engaged in conduct that adversely reflects on her fitness as a lawyer in violation of Rule 8.4(h) of the Rules of Professional Conduct (22 NYCRR 1200.00). Charge I of the Formal Written Complaint is sustained, and Respondent's misconduct is established.

The ethical obligations imposed by the Rules of Professional Conduct apply to all New York lawyers. It is especially important that prosecutors—given their role as public officials responsible for the administration of justice—comply with those ethical obligations. When a prosecutor engages in conduct that is prejudicial to the administration of justice, especially illegal conduct that adversely reflects on the prosecutor’s honesty, trustworthiness, and fitness as a lawyer, public confidence in the justice system is undermined. When the prosecutor engaging in that conduct is the elected District Attorney, the local official primarily responsible for the fair administration of justice in the State’s criminal courts, the risk to public confidence in the justice system is particularly acute. In such a case, condemnation of the prosecutor’s misconduct should be clear and public.

By reason of the foregoing, based on the prosecutorial misconduct found above, the Commission concludes that the appropriate sanction is public censure.

The Administrator is directed to transmit the Commission’s recommendation to the attorney grievance committee of the appellate division in the department where Respondent was admitted to practice.

Commissioners Botticelli, Bartlett, Eng, Griffin, Loigman, Marion, Obus, and Simons concur.

Commissioner Marion files a concurring opinion, which Commissioners Botticelli, Griffin, and Loigman join.

Commissioners Alonso and Lenox were not present.

Commissioner Dougherty did not participate in the consideration of this matter.

CERTIFICATION

It is certified that the foregoing is the determination and recommendation of the State Commission on Prosecutorial Conduct.

Dated: June 26, 2025

A handwritten signature in black ink, appearing to read "M. Simons", written over a horizontal line.

Michael A. Simons, Chair  
New York State  
Commission on Prosecutorial Conduct

STATE OF NEW YORK  
COMMISSION ON PROSECUTORIAL CONDUCT

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In the Matter of the Proceeding  
Pursuant to Section 499-f, subdivision 4,  
Of the Judiciary Law in Relation to

**SANDRA J. DOORLEY**

the District Attorney of Monroe County.

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CONCURRING OPINION  
BY COMMISSIONER MARION  
JOINED BY COMMISSIONERS  
BOTTICELLI, GRIFFIN, AND  
LOIGMAN

I agree with the Commission's conclusion that the stipulated facts demonstrate Respondent's misconduct. I write separately to articulate that I join in the Commission's recommendation of the sanction of a public censure because the Respondent represented under oath that she will be vacating her position as District Attorney.

Commissioners Botticelli, Griffin, and Loigman join in this opinion.

Dated: June 26, 2025



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Amy Marion, Member  
New York State  
Commission on Prosecutorial Conduct