COUNTY OF ROCKLAND	_
In the Matter of the Application of MICHAEL PARIETTI, ROBERT ROMANOWSKI, and DEBORAH SEIDMAN-MUNITZ,)) AFFIRMATION IN) SUPPORT
Petitioners, -against-) FOR ORDER TO) SHOW CAUSE) AND REQUEST FOR) EXPEDITED RELIES
TOWN OF RAMAPO, CHRISTIAN G. SAMPSON as TOWN OF RAMAPO TOWN CLERK, Respondents.)) Index No. /15
STATE OF NEW YORK)) ss: COUNTY OF ROCKLAND)	A

Susan H. Shapiro, Esq, being duly sworn, deposes and says:

I am an attorney duly admitted to practice before the Court of the State of New York, and affirms pursuant to CPLR Section 2106, upon information and belief, as follows:

I make this Affirmation on behalf my clients, the above named Petitioners, Michael Parietti, Robert Romonowski and Deborah Seidman-Munitz, in support of this motion for an order granting to following expedited relief:

- 1. Order to invalidate the Town of Ramapo's September 4, Certification of the Special Election conducted on September 30, 2014 on the Ward Referendum Propositions;
- 2. Order the Town of Ramapo to submit all necessary documents to Rockland County Board of Elections on or before September 28, 2015, or by the deadline established

by the Board of Elections, whichever is sooner, to ensure inclusion of the Ward Referendum Propositions on the ballot for the Town's biannual election to be held November 3, 2015; and

3. For such other and further relief as may to the court seem just and proper.

I request the Court grant the expedited relief sought in this Motion for the following reasons:

- 1. The preponderance of the evidence provided confirms that the manner in which the Town conducted the Special Election, whether by intent or sheer ineptitude, was so badly flawed, delayed and biased, that the integrity and outcome of the election was so corrupted and unreliable, than an unknown number of voters were disenfranchised, and that there was inadequate validation of unregistered voters eligibility to participate in this election. Thus, in the interest of fair and honest election, the Court's invalidation of the Town's Certification is necessary, and a new election needs to be ordered to be held as part of the Town's biennial election of November 3, 2015, on the Ward Referendum propositions.
- 2. Time is of the essence, in order to prevent further delay and to prevent additional expense to the Town of Ramapo taxpayers, it is requested that the Court order the Town to immediately provide all necessary documentation to the Board of Elections for the Ward Referendum Propositions to be included in the Town's biennial election of November 3, 2015, no later than September 27, 2015.

3. A prior application has not been made for the relief now requested.

WHEREFORE, I respectfully request that this motion be granted, and that I have such other and further relief as may be just and proper.

Susan H. Shapiro, Esq. Attorney for Petitioners (

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Nanuet, NY 10954

(845) 596-5403

cc:

Town of Ramapo, Michael Klein, Esq. Christian G. Sampson, Town Clerk Town of Ramapo