

STATE OF NEW YORK)
)ss.:
COUNTY OF ROCKLAND)

MELANIE L. GOLDEN, an attorney duly admitted to practice law in the Courts of the State of New York, hereby affirms the following to be true under the penalties of perjury:

1. I am an attorney admitted to practice in the State of New York and a Trustee of the Village of Montebello located in the Town of Ramapo, Rockland County, New York.
2. I submit this affirmation in support of the Petition to set aside the special election held by the Town of Ramapo on September 30, 2014. It is based upon information and belief except as to the matters stated to be upon direct knowledge.
3. On September 30, 2014, a special election was held in the Town of Ramapo on two propositions entitled, "Shall the Number of Councilmen or Councilwomen of the Town of Ramapo be Increased From Four to Six?" and "Shall the Ward System be Established For the Election of Councilmen and Councilwomen the Town of Ramapo?"
4. Although as a Trustee of the Village of Montebello I played no official role in the special election, confused residents of the Village began reaching out to me on election day, raising a number of concerns.
5. One constituent, Nan Klein who resides at 1 Plum Hill Drive in the Village of Montebello, called me and said her two young adult children had been denied absentee ballots because they were not registered voters in the Town of Ramapo. Ms. Klein stated that she read an article on Election Day in the Journal News that stated that unregistered voters could vote in the Town special election. She was very upset because the Town of

Ramapo's rejection of the absentee ballot application did not advise her children that they did not have to be registered to vote on Election Day.

6. Another constituent, Deb Seidman, who resides at 5 Rose Hill Road in the Village of Montebello, advised me that, contrary to what she had been led to believe by the Town, Ramapo was allowing unregistered voters to vote in the special election via affidavit ballots.

7. While I cannot recall the names of all of my constituents who were confused as to whether registration was required, there was enough confusion that my fellow Montebello Trustee, Stacey Caridi (who had also received calls) and I visited two polling locations for Village of Montebello residents to determine if unregistered voters were in fact being allowed to vote.

8. At the Montebello Community Center (one of the polling locations) I was advised by election inspector, Joan Neyland, that she and the other four poll inspectors were unaware that unregistered voters could vote until approximately four hours after the polls opened when someone came in loudly complaining that Ms. Neyland had turned away an unregistered voter who should have been allowed to vote. Ms. Neyland advised me that contrary to her training and much to her distress she confirmed with the Town Clerk that unregistered voters should be allowed to vote.

9. At the other polling location, the George Parness Suffern Community Center, we were advised by the election inspectors that they thought that only registered voters could vote until someone brought in an article from the Journal News insisting that they could vote because the article said unregistered voters could vote.

10. Ms. Neyland informed me that despite repeated requests to the Town throughout the day for additional affidavit ballot envelopes (only 10 had been provided), no additional affidavit ballots envelopes were ever delivered. Reviewing the results of the election and supporting documentation, it is clear that some locations were provided with substantial inventories of affidavit ballot envelopes and had substantial numbers of affidavit ballot voting; these polling locations, upon review, represent locations that where voting blocs favoring non-ward system cast their ballots.

11. It is reasonable to believe that late notice of the eligibility of unregistered voters to vote as well as the distribution of affidavit ballot envelopes was intended to affect the outcome of the vote. And, the results of the election clearly show that those who were provided such ballots voted in a manner completely different than those who were registered:

A. Registered voters:

Should there be a Ward System in Ramapo?

13,891 Voted Yes (50.66%)

13,526 Voted No (49.33%)

Should the number of Council members be increased from 4 to 6?

13,858 Voted Yes (50.50%)

13,581 Voted No (49.49%)

B. Registered voters who submitted absentee ballots voted this way:

Should there be a Ward System in Ramapo?

377 Voted Yes (65.22%)

201 Voted No (34.77%)

Should the number of Council members be increased from 4 to 6?

366 Voted Yes (63.65%)

209 Voted No (36.34%)

C. Unregistered voters who used Affidavits:

Should there be a Ward System in Ramapo?

419 Voted Yes (18.43%)

1,854 Voted No (81.56%)

Should the number of Council members be increased from 4 to 6?

420 Voted Yes (18.43%)

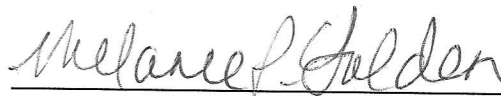
1,858 Voted No (81.56%)

The results show that the population of registered and absentee voters supported the proposals by more than 50% while the affidavit voters rejected the proposals by more than 80%.

12. A free and fair election requires equal access to voting by all citizens, and the accurate dissemination of information by the municipality or entity holding the vote. There is evidence that voters were turned away from the polls in some locations because poll inspectors had been trained by the Town that only registered voters could vote, or there were no affidavit ballots on hand to accommodate the unregistered voter. It is unclear how many of the thousands of unregistered voters might not have even gone to the polling stations, because they were misled to believe that they had to be registered to vote, thereby affecting the outcome. That the affidavit ballot results are so strikingly different from the rest of the voting results should make a reasonable voter concerned that the conduct and

outcome of this election were neither fair nor honest. Based on my conversations and experiences, citizens of Montebello do not have faith that this was a free and fair vote, and I believe the facts support this belief.

13. For all of these reasons, the Court is respectfully urged to set aside the Town of Ramapo special election of September 30, 2014 and order a new election on the two propositions.

A handwritten signature in cursive script, reading "Melanie Golden", written in dark ink. The signature is positioned above a horizontal line.

MELANIE GOLDEN