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April 23, 2024

Via NYSCEF

Hon. Charles D. Wood
Justice of the Supreme Court
Richard J. Daronco Westchester County Courthouse
111 Dr. Martin Luther King, Jr. Blvd.
White Plains, NY 10601

Re: *Sandra R. Galef, et al. v. Amanda Victoria Mintz, et al.*
Index No. 60632/2024

Dear Justice Wood:

As you know, this firm represents petitioners Sandra Galef, Catherine Borgia, and Dana Levenberg in this proceeding to invalidate the petition purporting to designate respondent Amanda Victoria Mintz as a candidate. Last evening the New York State Board of Elections provided the parties with its proposed disposition of the objections to the petition on a line-by-line basis. (Dkt. No. 23.)

The Board's document reflects that even if this Court were to find the requirement of Election Law § 6-130 that designating petitions include the signatories' correct town or city to be unconstitutional, the petition purporting to designate respondent would still have an insufficient number of signatures. Specifically, the Board has found that of the 655 signatures on the petition, 150 of the signatories are not registered to vote or are not enrolled Democrats, 23 of the signatories live outside of the district, 49 of the signatures are invalid due to uninitialed alterations, and one signatory witnessed his own petition signature. Therefore, even omitting the signatures that are invalid due to incorrect town or city, the petition has only 432 signatures. As a result, any challenge to the constitutionality of the town/city requirement would not be academic.

Based upon the statements made by respondent's counsel yesterday, we therefore expect that the respondent will decline to oppose the relief requested in this proceeding and we respectfully request that the Court grant the petition and declare the respondent's designating petitions invalid.

Respectfully yours,

Robert A. Spolzino

cc: Arthur Schwartz, Esq.
Counsel for Respondent