

New York Supreme Court, Albany County

Gerard Aprea,)	CASE NO. 7215-11
John Vidurek,)	
)	HON Judge Joseph C. Teresi
Plaintiffs;)	
)	
- vs -)	
)	
NEW YORK STATE BOARD OF ELECTIONS,)	PLAINTIFFS AMENDED
DUTCHESS COUNTY BOARD OF ELECTIONS,)	VERIFIED ANSWER
GREEN COUNTY BOARD OF ELECTIONS,)	TO GREEN COUNTY BOE
Defendants.)	

Plaintiffs, Gerard Aprea and John Vidurek, for an answer to GREEN COUNTY BOARD OF ELECTIONS (GCBOE) affirmative defenses.

GCBOE's AFFIRMATIVE DEFENSE

1. Plaintiffs denies the first affirmative defense and demands strict proof.
2. Plaintiffs denies the second affirmative defense and demands strict proof.
3. Plaintiffs denies the third affirmative defense and demands strict proof.
4. Plaintiffs denies the fourth affirmative defense and demands strict proof.
5. Plaintiffs denies the fifth affirmative defense and demands strict proof.

CLARIFICATION FOR COUNSEL

6. Plaintiffs have not stated within its complaint that they are suing DCBOE but the NEW YORK STATE BOARD OF ELECTIONS of which DCBOE is a subsidiary of.

7. DCBOE is subservient to and cannot answer for the NEW YORK STATE BOARD OF ELECTIONS.

8. Plaintiffs complaint paragraph 9 quotes defendants mission statement; "NYSBOE ... is responsible for administration and enforcement for all 62 county BOE's".

9. This action is statewide and alleges violations in virtually all sixty-two (62) county boards of elections, of which DCBOE is a member of, as stated in plaintiffs complaint paragraph 13.

VERIFICATION

All rights reserved,

John Vidurek, sui juris, unrepresented
Lead Plaintiff
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Hyde Park, New York

SIGNATURE VERIFICATION FOR WITNESS PURPOSES ONLY

Use of notary is for cognizance in foreign venue only and not meant to convey jurisdiction.

Subscribed before me, _____, a Notary Public, on this _____ day of the Eleventh month of the Year of our Lord two thousand eleven and two hundred thirty-fifth Year of our Independence.

Notary

My commission expires:

(Seal)