

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

MELANIE KAMBOURIS, AMANDA SEMEL
ANDREW FOSSATTI, ANNA STITHOS,
CANDICE WITTMER, CATHERINE PETRONE
COURTNEY KASSEBAUM, DANIELLE ELAZEHE,
DANIELLE CALAPAI, DIANA HARRISON,
ERICA WILHELM, ERIETA MYFTARAJ,
GENEVIEVE GIOELI, GREGORY MAST,
HENNA FOSSATTI, JACQUELINE LANGONE,
JENA FORGIONE, JENNIFER VILLALTA,
JENNIFER FICETO, JESSICA MAST,
KIM MARINELLI, LAUREN HORAN,
LISA IRVINE, MARSIDA ASHAFI,
STEFANIE RUDE, SUZANNA CIANCI,
TIFFANY KLEIN, VICKY STITHOS
RESMIGE GIOVANNA
KATHERINE GANIARIS

Petitioners,

v

NEW YORK CITY DEPARTMENT OF
EDUCATION, DAVID BANKS *in his*
Official capacity as Chancellor, and DANIEL
WEISBERG *in his official capacity as First*
Deputy Chancellor.

Respondents

TO THE SUPREME COURT OF THE STATE OF NEW
YORK, COUNTY OF KINGS

Index No. _____

VERIFIED PETITION

PRELIMINARY STATEMENT

1. Petitioners are employed by the DOE. The majority of Petitioners are tenured teachers. Two are untenured. Petitioners provided Respondents with proof of vaccination as required on or about September 2021. That is, they got vaccinated and complied with every single one of Respondents' demands. Nearly a year later, on April 19, 2022, the DOE spontaneously, placed Petitioners on leave without pay, effective April 25, 2022, without any facts. Respondents brazenly disciplined Petitioners in abrogation of their due process rights.
2. Petitioners commence this hybrid special proceeding pursuant to the Civil Procedure Laws and Rules (CPLR) Articles 78, 63, and §3001 seeking the following:
 - a. A declaratory judgment finding that the respondents violated Tenured Petitioner's rights pursuant to New York State Education Law (EDL) §§ 3020, 3020-a.
 - b. A declaratory judgment that Respondents determination deprived Petitioners' of property without due process of law guaranteed under article 1 section 6 of the New York State Constitution.
 - c. Judgement that the Respondents took disciplinary action without a just cause.
 - d. A declaratory judgment that the respondents determination is null, void, and unenforceable.

- e. A temporary, preliminary, and permanent injunction enjoining the Respondents from enforcing its determination.
 - f. A temporary restraining order and a preliminary injunction re-instating Petitioners, unless, and until, Respondents lawfully commence disciplinary proceedings.
 - g. Judgement that the Respondents took disciplinary action in violation of lawful procedure pursuant to CPLR §7803.3.
 - h. Back pay and any other compensation Petitioners would have received but for Respondents unlawful determination.
 - i. Any, and all further relief as this Court deems just and proper.
3. Respondents have taken disciplinary action against Petitioners without providing any process whatsoever in violation of the EDL and the New York State Constitution. Respondents conduct is continuous and ongoing. Petitioners have been irreparably harmed by Respondents deprivation of Petitioners' property without due process of law. Petitioners will suffer irreparable harm as addressed *inter alia* in the absence of the injunctive relief sought herein.
4. Petitioners have a likelihood of success on the merits and a balancing of the equities favors Petitioners.
5. For the reasons set forth below, in the accompanying Memorandum of Law, and Petitioners' affidavits, this Court should grant Petitioners the relief sought.

SUPPORTING AFFIDAVITS AND EVIDENCE

6. In support of this petition, Petitioners submit the accompanying Memorandum of Law, dated June 30, 2022, and affidavits and exhibits annexed hereto and made a part hereof.

PARTIES

7. Twenty-Six Petitioners are tenured teachers.
8. One Petitioner is a tenured social worker.
9. Two Petitioners are teachers who would have been eligible for tenure this school year.
10. One Petitioner is a paraprofessional who has worked for the DOE for eight (8) years.
11. Petitioners collectively have 379 years of experience working for the DOE.
12. All Petitioners are employees of the DOE.
13. Respondent New York City Department of Education (DOE) is a public corporation with its main office located at 65 Court Street, Brooklyn, New York 11201.
14. Respondent David Banks (Banks) is currently the Chancellor for the DOE.
15. Respondent Daniel Weisberg (Weisberg) is currently the first deputy chancellor for the DOE.

JURISDICTION AND VENUE

16. This Court has jurisdiction over these proceedings pursuant to CPLR article 78 as the respondents are each a body or officer that made a determination in violation of lawful procedure. CPLR §7803.2.
17. Certain Petitioners worked in schools situated in Kings County.
18. The DOE operates and controls schools in every borough of New York City.
19. Venue is proper pursuant to CPLR §506(b).

STATEMENT OF FACTS

20. On or about April 19, 2022, Petitioners received an email (**EXHIBIT 1**).

21. The email was from the DOE Division of Human Resources.

22. Respondent Weisberg oversees the Division of Human Resources (HR).

23. The email stated in sum and substance:

“We have received information that the proof of vaccination that you uploaded to the DOE Portal, pursuant to the New York City Health Commissioner’s Order requiring vaccination of all NYCDOE staff, was fraudulent. . . . Since we have reason to believe that you have not complied with that Order, effective Monday, April 25, 2022, **you are being placed on Leave Without Pay** with benefits until further notice. You should not report to your school/work location until after the April vacation and your school/office will be notified of this change in your status. If you believe you are receiving this notice in error, please contact DOEVaccineCompliance@schools.ny.gov.” (emphasis in original).

24. Respondents have not provided any information beyond the vague letter dated April 19, 2022.

25. Respondents have not provided Petitioners with any process.

26. Pursuant to EDL §3020 no tenured teacher may be “disciplined or removed during a term of employment except for just cause and in accordance with the procedures specified in [§3020-a] . . .”

27. Pursuant to EDL §3020-a.(1) All charges against a tenured teacher “shall be in writing and filed with the clerk or secretary of the school district or employing board during the period between the actual opening and closing of the school year for which the employed is normally required to serve.”

28. EDL §3020-a(2) provides Petitioners with further rights. First, the members of such board must—by a majority vote—find that probable cause “exists to bring a disciplinary proceeding against an employee.” *Id.*
29. Next, if the board finds there is probable cause it must take several steps—including preparing a “written statement specifying [] the charges in detail” *id*—informing the employee of the charges and his or her rights.
30. The employee has a right to a hearing *id.*
31. Even then, if an employee is suspended pending the hearing, the employee must be provided with pay unless the employee has plead guilty to, or has been convicted of one or more felonies as specified. EDL §320-a(2)(b).
32. Tenured Petitioners have a constitutionally protected property interest in their right to continued employment. No one can deprive Petitioners of their property right without due process of law.
33. Untenured Petitioners’ had an explicit property right to be considered for tenure. Respondents deprived them of this right without due process of law.
34. Respondents conduct stigmatized untenured Petitioners as said Petitioners did not appear at work following spring break. Their students, and colleagues noticed that they suddenly were not at work. Colleagues speculated that untenured Petitioners engaged in misconduct. Respondents marked untenured Petitioners files which impairs their ability to obtain future employment.
35. Petitioners have not plead guilty to any crime, and have not been convicted of any felony.

- 36. Petitioners have not been arrested for any offense.
- 37. Respondents have not even filed written charges.
- 38. Respondents have not attempted to comply with the law.
- 39. Respondents have taken disciplinary action against Petitioners without providing them due process of law.
- 40. Petitioners are fully vaccinated, DOE employees, in compliance with the DOE's requirements.
- 41. Respondents have trampled on Petitioner's statutory and Constitutional rights.

INJUNCTIVE RELIEF SHOULD BE GRANTED

- 42. To prevail on a motion for a temporary restraining order and preliminary injunction, Petitioner has the burden of establishing by clear and convincing evidence “(1) a likelihood of success on the merits, (2) irreparable injury absent granting the injunction, and (3) a balancing of the equities in [petitioners'] favor.” *County of Suffolk v. Givens* 106 A.D.3d 943 [2d Dept, 2013]; *Apa Security, Inc., v. Apa*, 37 A.D.3d 502, [2d Dept, 2007]. Petitioner does not have to show a certainty of success but make a prima facie showing of reasonable probability of success *see e.g. Barbes Rest, Inc. v ASRR Suzer* 218, LLC, 140 A.D.3d 430 [2016].
- 43. Petitioners have demonstrated a likelihood of success on the merits. Indeed, it is difficult to discern how Respondents could possibly defend its blatantly unlawful action. Respondents' determination is abhorrent to every fiber of the

due process clause. Simply put, Respondents were required to provide Petitioners with due process, and they did not. There is no legal justification or excuse availing Respondents with an escape hatch.

44. Petitioners will be irreparably harmed in numerous ways absent granting an injunction.

45. First, Respondents deprivation of Petitioners' due process rights is per se irreparable harm.

46. Second, Petitioners' have shown that the respondents' unlawful determination has toppled their lives in significant ways. Absent injunctive relief, Petitioners will not be able to pay for shelter, food and necessities, their families will lose opportunities that had been planned with the expectation of income, certain Petitioners have suffered from psychological impairments that will worsen, their credit will suffer, their ability to work again will be impaired, they may become homeless, certain Petitioners were working individually with disabled students who currently have no aid etc. Respondents suddenly informed Petitioners during spring break that they were being placed on leave without pay. Petitioners had no notice or opportunity to even prepare. Petitioner will lose everything.

47. The balancing of the equities favor Petitioners because injunctive relief restores their civil rights as they enjoyed them prior to the respondents unlawful determination. On the other hand, Respondents have no equitable interest in depriving DOE staff of rights without due process.

FIRST CAUSE OF ACTION
DECLARATORY JUDGMENT THAT RESPONDENTS VIOLATED
TENURED PETITIONERS RIGHTS UNDER EDUCATION LAW §§3020,
3020[a]

48. Petitioners repeat and re-allege every allegation above as though fully set forth herein.
49. Education Law §§ 3020 and 3020-a sets forth the procedures Respondents must follow prior to disciplining a tenured teacher.
50. Education Law §§ 3020 and 3020-a are the exclusive means of disciplining a tenured teacher.
51. Respondents disciplined Petitioners in abrogation of said process.
52. Respondents have not filed charges with the board, provided Petitioners with written notice detailing the allegations, or complied with any of the requisite legal procedures.
53. Respondents have disciplined Petitioners without just cause.
54. Petitioners continue to be harmed.

SECOND CAUSE OF ACTION
DECLARATORY JUDGMENT THAT RESPONDENTS DETERMINATION
DEPRIVED PETITIONERS OF PROPERTY WITHOUT DUE PROCESS
PURSUANT TO N.Y. CONST. ART 1 § 6

55. Petitioners repeat and re-allege every allegation above as though fully set forth herein.
56. Respondents may not deprive any Petitioner of life, liberty, or property without due process of law.

57. Tenured Petitioners have an explicit property interest in continued employment.

58. Non tenured Petitioners had a property right to be considered for tenure.

59. Respondents' bare boned allegation that their vaccine card was fraudulent implicated non tenured Petitioners integrity and character thereby entitling them to a due process hearing.

60. Respondents' callously and unconstitutionally deprived Petitioners of their property right in continued employment without due process of law.

61. The Constitutional infringement is ongoing and continues to harm Petitioners.

**THIRD CAUSE OF ACTION
RESPONDENTS TOOK DISCIPLINARY ACTION AGAINST TENURED
TEACHERS WITHOUT JUST CAUSE**

62. Petitioners repeat and re-allege every allegation above as though fully set forth herein.

63. EDL §3020 provides that no disciplinary action may be taken against a tenured teacher without just cause and in accordance with the procedures set forth in EDL §3020-a.

64. Respondents summarily disciplined Tenured Petitioners without any cause.

**FOURTH CAUSE OF ACTION
DECLARATORY JUDGMENT THAT RESPONDENTS'
DETERMINATION IS INVALID NULL, VOID, AND UNENFORCEABLE.**

65. Petitioners repeat and re-allege every allegation above as though fully set forth herein.

66. Respondents disciplined Petitioners in abrogation of their due process rights.
67. The determination placing Petitioners on leave without pay was procured in violation of the EDL and NY State Constitution.
68. It, therefore, should be deemed a legal nullity.
69. The determination should be declared void from the outset.

**FIFTH CAUSE OF ACTION
TEMPORARY RESTRAINING ORDER
PRELIMINARY AND PERMANENT INJUNCTION
ENJOINING RESPONDENTS FROM ENFORCING THE
DETERMINATION**

70. Petitioners repeat and re-allege every allegation above as though fully set forth herein.
71. Respondents should be enjoined from enforcing its determination.
72. For all the reasons set forth above, in the accompanying Memorandum of Law, affidavits, and the exhibits and affirmation annexed hereto, injunctive relief requested here should be granted.
73. Petitioners have no adequate remedy at law. No compensation can undo the damage that Petitioners have incurred, and will continue to incur absent injunctive relief.

**SIXTH CAUSE OF ACTION
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION
REINSTATING PETITIONERS UNLESS, AND UNTIL RESPONDENTS
LAWFULLY COMMENCE DISCIPLINARY PROCEEDINGS**

74. Petitioners repeat and re-allege every allegation above as though fully set forth herein.
75. Petitioner should be reinstated unless, and until, Respondents lawfully commence a disciplinary proceeding.

76. Petitioners have no adequate remedy at law.

**SEVENTH CAUSE OF ACTION
RESPONDENTS' DETERMINATION WAS MADE IN VIOLATION OF
LAWFUL PROCEDURE PURSUANT TO CPLR §7803**

77. Petitioners repeat and re-allege every allegation above as though fully set forth herein.

78. As set forth above, Respondents' made its determination in violation of the EDL and New York State's due process clause.

CONCLUSION

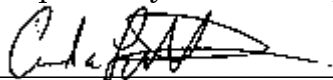
WHEREFORE Petitioners respectfully requests this Court grant the following relief:

- a. A declaratory judgment finding that the respondents violated Tenured Petitioner's rights pursuant to New York State Education Law (EDL) §§ 3020, 3020-a.
- b. A declaratory judgment that Respondents determination deprived Petitioners' of property without due process of law guaranteed under article 1 section 6 of the New York State Constitution.
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- g. Judgement that the Respondents took disciplinary action in violation of lawful procedure pursuant to CPLR §7803.3.
- h. Back pay and any other compensation Petitioners would have received but for Respondents unlawful determination.
- i. Any, and all further relief as this Court deems just and proper.

Dated: June 30, 2022
Hauppauge, New York

Respectfully Submitted,



CHAD J. LAVEGLIA ESQ.,
LAW OFFICE OF CHAD J. LAVEGLIA PLLC
Attorneys for Petitioners
350 Motor Parkway, Ste 308
Hauppauge, NY 11788
(631) 450-2468
claveglia@cjLLaw.org

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

MELANIE KAMBOURIS, AMANDA SEMEL
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TIFFANY KLEIN, VICKY STITHOS
RESMIGE GIOVANNA

Petitioner,

-against-

NEW YORK CITY DEPARTMENT OF
EDUCATION, DAVID BANKS *in his*
Official capacity as Chancellor, and DANIEL
WEISBERG *in his official capacity as First*
Deputy Chancellor.

Respondents

VERIFIED PETITION

LAW OFFICE OF CHAD J. LAVEGLIA
Attorney for Petitioner
350 Motor Parkway, Ste 308
Hauppauge, NY
Tel: (631) 450-2468
claveglia@cjlLaw.org

CERTIFICATION PURSUANT TO 22 N.Y.C.R.R. § 130-1.1a

Chad J. LaVeglia Esq., hereby certifies that, pursuant to 22 N.Y.C.R.R. § 130-1.1a, the foregoing **Petition** is not frivolous, nor frivolously presented.

Dated: Hauppauge, New York
June 30, 2022



Chad J. LaVeglia.

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Nassau)

Lauren Horan being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.



Lauren Horan
[type name]

Sworn and subscribed before me
This 28 day of JUNE 2022

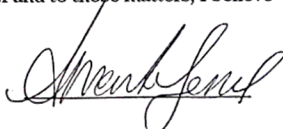
Alec Wes Alimagno
Notary Public

ALEC WES ALIMAGNO
NOTARY PUBLIC - STATE OF NEW YORK
NO. 01AL6410020
QUALIFIED IN NASSAU COUNTY
COMMISSION EXPIRES 10/13/2024

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Kings)

Amanda Semel being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.



Amanda Semel
[type name]

Sworn and subscribed before me
This 27 day of JUNE 2022

Michael Piccinnini
Notary Public

MICHAEL PICCINNINI
Notary Public, State of New York
No. 01P16033812
Qualified in Kings County
Commission Expires November 29, 2025

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Nassau)

Andrew Fossatti being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Andrew Fossatti

Andrew Fossatti

[type name]

Sworn and subscribed before me
This 27th day of June 2022


Notary Public

Khary Pitt
NOTARY PUBLIC-STATE OF NEW YORK
No. 01PI6183998
Qualified in Nassau County
Commission Expires 3/24/20 24

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Nassau)

Text

Anna Stithos being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Anna Stithos

Anna Stithos

[type name]

Sworn and subscribed before me
This 28 day of June 2022

[Signature]

Notary Public

MD O HOQUE
Notary Public, State of New York
No.01HO6281223
Qualified in Nassau County
Commission Expires May 20, 2025

VERIFICATION OF PETITION

STATE OF NEW YORK)
COUNTY OF Nassau)ss:
)

Candice Wittmer being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Cand Wittmer

CANDICE WITTMER
[type name]

Sworn and subscribed before me
This 28th day of June 2022


Herbert Waldhauser
Notary Public

HERBERT WALDHAUSER
Notary Public, State of New York
Registration #01WA4679653
Qualified in Nassau County
Commission Expires January 31, 2023


VERIFICATION OF PETITION

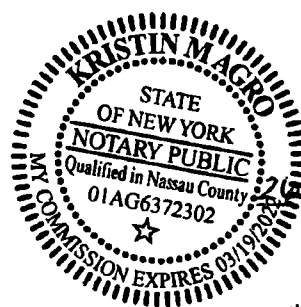
STATE OF NEW YORK)
)ss:
COUNTY OF Nassau)

Courtney Kassebaum being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.


Courtney Kassebaum
[type name]

Sworn and subscribed before me
This 27 day of June 2022

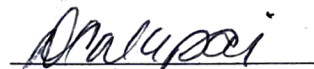

Notary Public



VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Nassau)

Danielle Calapai being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.



Danielle Calapai

[type name]

Sworn and subscribed before me
This 27th day of June 2022


Notary Public

JEFFREY J PASTORE
NOTARY PUBLIC STATE OF NEW YORK
NO. 01PA6266422
SUFFOLK COUNTY
COMM. EXP. 07-30-2024

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Kings)

Danielle Elazeh being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Danielle Elazeh
Danielle Elazeh
[type name]

Sworn and subscribed before me
This 27th day of June, 2022

[Signature]
Notary Public



VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Nassau)

Diana Harrison being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my know edge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Diana Harrison

Diana Harrison

Sworn and subscribed before me
This 27 day of JUNE 2022

Angelo Magoulas

Notary Public

ANGELO MAGOULAS
Notary Public - State of New York
NO. 01MA6427433
Qualified in Suffolk County
My Commission Expires Dec 27, 2025

VERIFICATION OF PETITION

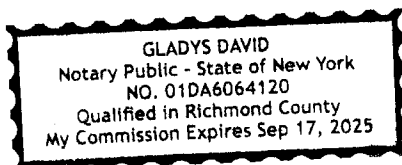
STATE OF NEW YORK)
)ss:
COUNTY OF Richmond)

Erieta Myftaraj being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Erieta Myftaraj
Erieta Myftaraj
[type name]

Sworn and subscribed before me
This 27 day of June 2022

Gladys David
Notary Public



VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Nassau)

Genevieve Gioeli being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Genevieve Gioeli

[type name]

Sworn and subscribed before me
This 28 day of June 2022


Notary Public

DAVID SCHNEIDEWIND
NOTARY PUBLIC, State of NY
No. 01SC6391355
Qualified in Nassau County
Commission Exp. May 6, 2023

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Nassau)

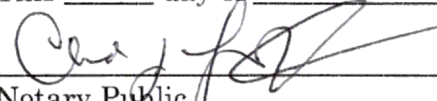
Gregory Mast being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.


ID 7q6zpUAXrh6BP6iuZfRbuZd

Gregory Mast

[type name]

Sworn and subscribed before me
This 30th day of June 2022


Notary Public

CHAD J. LAVEGLIA
Notary Public, State of New York
Reg. No. 02LA6384664
Qualified in Nassau County
Commission Expires December 17, 2022

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Nassau)

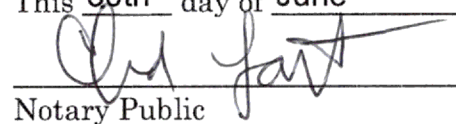
Jessica Mast being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.


ID QWKdYiZF1ERFCnsBgMJn9XV

Jessica Mast

[type name]

Sworn and subscribed before me
This 30th day of June 2022


Notary Public

CHAD J. LAVEGLIA
Notary Public, State of New York
Reg. No. 02LA6384664
Qualified in Nassau County
Commission Expires December 17, 2022

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Nassau)

Henna Fossatti being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Henna Fossatti

Henna Fossatti

[type name]

Sworn and subscribed before me
This 27th day of June 2022

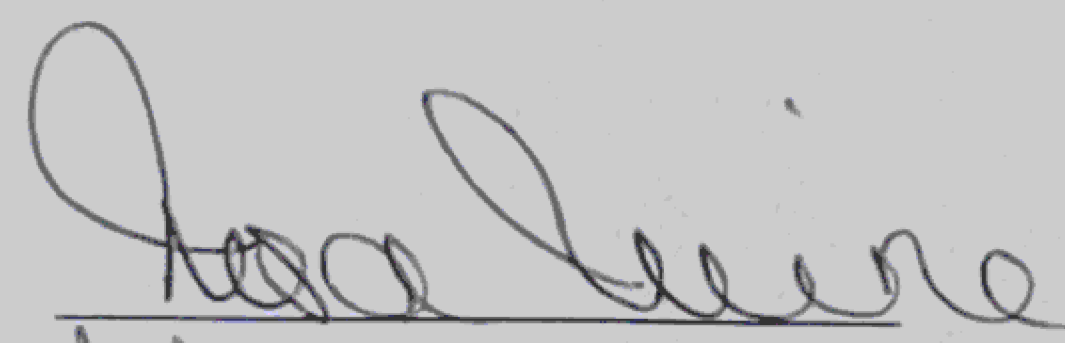
[Signature]
Notary Public

Khary Pitt
NOTARY PUBLIC-STATE OF NEW YORK
No. 01PI6183998
Qualified in Nassau County
Commission Expires 3/24/20 24

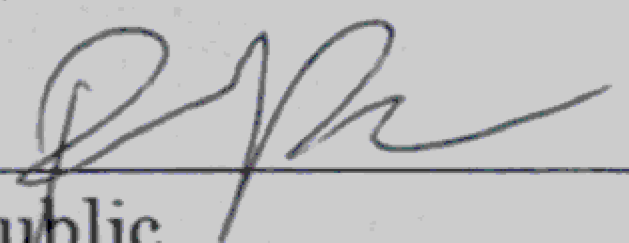
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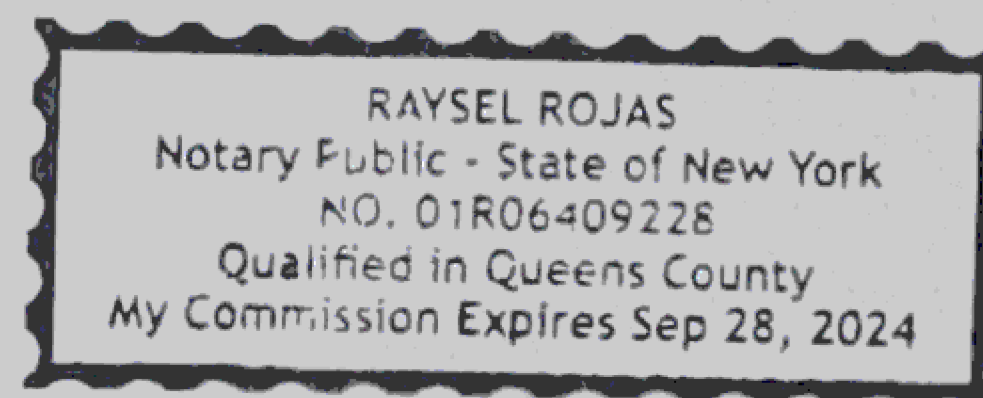
STATE OF NEW YORK)
)ss:
COUNTY OF Queens)

Lisa Irvine being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.


Lisa Irvine
[type name]

Sworn and subscribed before me
This 27th day of June 2022


Notary Public



VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Richmond)

Jacqueline Langone being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Jacqueline Langone

Jacqueline Langone

[type name]

Sworn and subscribed before me
This 27th day of June 2022

Jillian Triano
Notary Public

JILLIAN TRIANO
NOTARY PUBLIC-STATE OF NEW YORK
No. 01TR6364869
Qualified in Richmond County
My Commission Expires 09-25-2025

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Nassau)

Jena Forgione being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Jena Forgione
Jena Forgione
[type name]

Sworn and subscribed before me
This 27th day of June 2022

Jacqueline Thomas
Notary Public

Jacqueline Thomas
NOTARY PUBLIC, State of New York
No. 01TH6173203
Qualified in Queens County
Commission Expires August 20, 2023

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Suffolk)

Jennifer Ficeto being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Jennifer Ficeto
JENNIFER FICETO
[type name]

Sworn and subscribed before me
This 27 day of June 2022

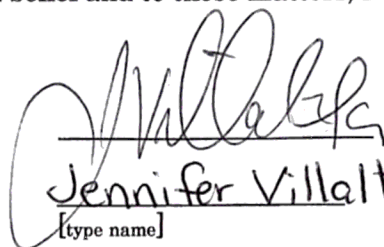
[Signature]
Notary Public

JOHN GIORDANO
Notary Public - State of New York
NO. 01GI6364106
Qualified in Suffolk County
My Commission Expires Sep 5, 2025

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Suffolk)

Jennifer Villalta being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.


Jennifer Villalta
[type name]

Sworn and subscribed before me
This 27 day of JUNE 2022

Maureen Fagan
Notary Public

MAUREEN FAGAN
Notary Public, State of New York
Suffolk County
Lic. #01FA5057844
Commission Expires 04-01-2026

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Nassau)

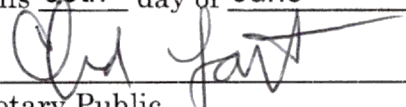
Jessica Mast being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.


ID QWKdYiZf1ERFCnsBgMJJaN9XV

Jessica Mast

[type name]

Sworn and subscribed before me
This 30th day of June 2022



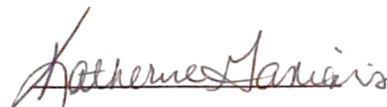
Notary Public

CHAD J. LAVEGLIA
Notary Public, State of New York
Reg. No. 02LA6384664
Qualified in Nassau County
Commission Expires December 17, 2022

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Queens)

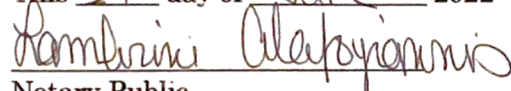
Katherine Ganiaris being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters. I believe them to be true.



Katherine Ganiaris

[type name]

Sworn and subscribed before me
This 21st day of June 2022



Notary Public

LAMBRINI ALAFOYIANNIS
Notary Public, State of New York
No. 01AL6109001
Qualified in Queens County
Commission Expires April 26, 2024

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF SUFFOLK)

Kim Marinelli, being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Kim Marinelli
Kim Marinelli
[type name]

Sworn and subscribed before me
This 27th day of June 2022

David J. Shepard
Notary Public

DAVID J. SHEPARD
Notary Public, State of New York
No. 01SH6328441
Qualified in Suffolk County
Commission Expires August 3, 2023

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
 COUNTY OF Nassau)

Melanie Kambouris being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Melanie Kambouris

Melanie Kambouris

[type name]

Sworn and subscribed before me
 This 27 day of June 2022

Kristin Magro
 Notary Public



VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Nassau)

Catherine Petrone being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Catherine Petrone
Catherine Petrone
[type name]

Sworn and subscribed before me
This 28 day of JUNE 2022

Alec Wes Alimagno
Notary Public
ALEC WES ALIMAGNO
NOTARY PUBLIC - STATE OF NEW YORK
NO. 01AL6410020
QUALIFIED IN NASSAU COUNTY
COMMISSION EXPIRES 10/13/2024

VERIFICATION OF PETITION

STATE OF NEW YORK

COUNTY OF Kings)
)
ss:

Resmije Giammona being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Resmije Giammona
Resmije Giammona
[type name]

Sworn and subscribed before me

This 28th day of June 2022

Stacy Masciarelli
Notary Public

STACY MASCIARELLI
Notary Public - State of New York
NO. 01MA6192580
Qualified in Kings County
My Commission Expires Sep 2, 2024

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Nassau)

Stefanie Rude being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Stefanie Rude

Stefanie Rude

[type name]

Sworn and subscribed before me

This 27 day of June 2022

Ted R Driggin
Notary Public

TED R DRIGGIN
Notary Public - State of New York
NO. 01DR6363962
Qualified in Nassau County
My Commission Expires Sep 5, 2025

VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF Nassau)

 Suzanna Cianci being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Suzanna Cianci

Suzanna Cianci

[type name]

Sworn and subscribed before me

This 27 day of July 2022


Kristin Macro
Notary Public

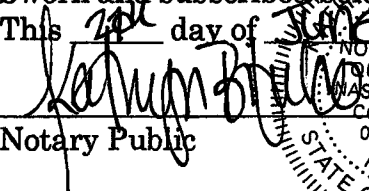
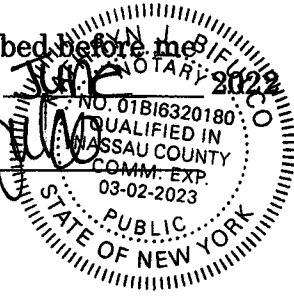


VERIFICATION OF PETITION

STATE OF NEW YORK)
)ss:
COUNTY OF NASSAU)

TIFFANY KLEIN being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.


TIFFANY KLEIN
[type name]

Sworn and subscribed before me
This 24 day of JUNE 2022

Notary Public


VERIFICATION OF PETITION

STATE OF NEW YORK)

)ss:

COUNTY OF NASSAU)

Vicky Stithos being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Vicky StithosVicky Stithos

[type name]

Sworn and subscribed before me
This 27th day of June, 2022

Kathryn Pollock
Notary Public
STATE OF NEW YORK
NOTARY PUBLIC
COMM. EXP. 03-02-2023
NASSAU COUNTY
OFFICE OF THE CLERK
16320180

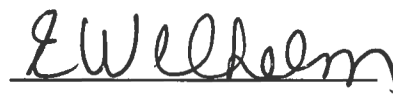
VERIFICATION OF PETITION

STATE OF NEW YORK

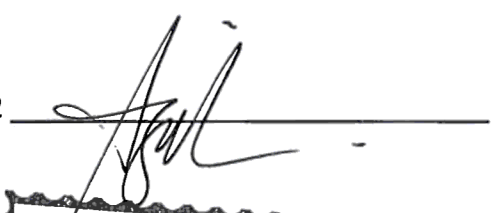
) ss:

COUNTY OF QUEENS)

Erica Wilhelm being duly sworn, states that I am a Petitioner in the within proceeding. I have read the foregoing Petition and know the contents thereof. Said contents which are attributable to me are true to my knowledge, except those matters therein stated to be alleged upon information and belief and to those matters, I believe them to be true.

Erica Wilhelm

Sworn and subscribed before me

This 27th day of June 2022 

Notary Public

