

held unconstitutional as under Board of Estimates vs. Morris, *supra* because

- a) In New York City Richmond has a board member as does the more populous Kings County.
- b) The board does not represent minor party voters who have ballot access such as the Green Party, Independence Party, Conservative Party and Working Families Party.
- c) The Board does not have representation for independent voters although they are more numerous than Republican Party voters.
- d) The New York State Constitution which established representation for the Republican Party and Democratic Party was written many years ago and does not reflect voting reality nowadays
- e) The Board gives equal representation to the Republican Party and the Democratic Party although the Democratic voters are much more numerous

93. The New York State Board of Elections has judicial hearings deciding which candidates are to be on the ballot and this is violative of procedural due process of the

Fourteenth Amendment because the Board is selected by the Republican Party Chairman and the Democratic Party Chairman which makes them inherently prejudiced and unfair.

94. The local boards of elections in New York hires party loyalists as election inspectors who have fraudulently been hired to vote for the chosen party candidates and are not independent inspectors to voting and have acted fraudulently because their paid job depends on their being loyal to the party chairmen of the Republican and Democratic Parties which undermines the fairness of the democratic process and is flagrantly violative of the constitutionally protected elements of fair elections.

WHEREFORE, the plaintiffs seek the following remedy:

1. Sam Sloan and the other 10 candidates be placed back on the ballot as Judicial Delegate in the Democratic Primary to be held on September 10, 2015.
2. The New York State and City Board of Elections should be declared unconstitutional and disbanded.
3. That the attorney for the plaintiffs be paid legal fees for this case
4. That the plaintiff be paid damages and all the costs.

5. That this court take all such action it deems just and proper.

Dated: Bronx, New York

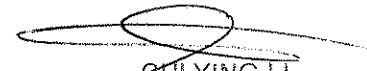
September 2, 2015



Sam Sloan, Petitioner
1664 Davidson Ave 1B
Bronx, New York 10453

SWORN BEFORE ME THIS
2 DAY OF Sept 2015

917-507-7226
917-659-3397



CUI YING LI
Notary Public, State of New York
No. 01LI6303092
Qualified in New York County
Commission Expires May 12, 2018

SPECIFICATIONS OF OBJECTION

BX 4-1

TO: The Board of Elections in the City of New York

OBJECTOR: Name: BENNY CATALA
 Residence: 316 E. 164th ST.
BRONX, N.Y. 10456

OBJECTOR'S CONTACT PERSON:

Name: Stanley Kalmon Schlein
 Mailing Address: 481 King Avenue
 (May be a business address) Bronx, NY 10464
 Telephone Number: 917.359.3186
 Fax Number: 347.281.5984

The objector(s) submits the following specifications in support of the General Objections to the designating petition for the offices set forth on the attached schedule.

PETITION VOLUME IDENTIFICATION NUMBERS: PY. 1500721
 CANDIDATE'S CONTACT PERSON (from the petition cover sheet)

Name: MILLIE QUINONES
 Mailing Address: 1921 JEROME AVE.
 (May be a business address) BRONX, N.Y. 10453
 Telephone Number: 714-799-0115
 Fax Number:

TOTAL NUMBER OF SIGNATURES ON PETITIONS: 2NUMBER OF INVALID SIGNATURES ON PETITION: N/A

The line by line any other specific objections are attached.

Objector's Signature

RECEIVED
 BOARD OF ELECTIONS IN
 THE CITY OF NEW YORK
 32 BROADWAY
 2015 JUL 20 P 4:05

Nature of objections

The number of signatures claimed in the totality of this petition is less than the 500 signatures that is required for the designation of the candidates for this Party position as set forth on the schedule of respondents.

RECEIVED
BOARD OF ELECTIONS IN
THE CITY OF NEW YORK
32 BROADWAY

2015 JUL 20 P 4:05

SCHEDULE OF RESPONDENTS

Name of Candidate (s)	PARTY POSITION (s)	Place of Residence
<input checked="" type="checkbox"/> Carlton Curry <input checked="" type="checkbox"/> Sam Sloan <input checked="" type="checkbox"/> Millie Quinones <input checked="" type="checkbox"/> Lynn Sanchez <input checked="" type="checkbox"/> Santos Orozco <input checked="" type="checkbox"/> Stephanie Gibbs	Judicial Delegates to the 12th Judicial District Democratic Convention from the 77th Assembly District of the State of New York	1131 Ogden Ave., Bronx, N.Y. 10452 1664 Davidson Ave., Bronx, N.Y. 10453 1921 Jerome Ave., Bronx, N.Y. 10453 1505 Walton Ave., Bronx, N.Y. 10452 1473 Montgomery Ave., Bronx, N.Y. 10453 1135 University Ave., Bronx, N.Y. 10452
<input checked="" type="checkbox"/> Edwin Figueroa <input checked="" type="checkbox"/> Zoe L. Curry <input checked="" type="checkbox"/> Nereida Narvaez <input checked="" type="checkbox"/> Lorraine Zeigler <input checked="" type="checkbox"/> James Baldwin	Alternate Judicial Delegates to the 12th Judicial District Democratic Convention from the 77th Assembly District of the State of New York	1521 Sheridan Ave., Bronx, N.Y. 10457 1131 Ogden Ave., Bronx, N.Y. 10452 1815 Davidson Ave., Bronx, N.Y. 10453 1199 Dr. Martin L. King Jr. Blvd., Bx NY 10452 985 Anderson Ave., Bronx, N.Y. 10452

2015 JUL 20 P 4:05
 RECEIVED
 BOARD OF ELECTIONS IN
 THE CITY OF NEW YORK
 32 BROADWAY