

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU**

-----X

Index No. 611872-2023

HAZEL COADS; STEPHANIE M. CHASE;
MARVIN AMAZAN; SUSAN E. COOLS;
SUZANNE A. FREIER; CARL R. GERRATO;
ESTHER HERNANDEZ-KRAMER;
JOHN HEWLETT JARVIS;
SANJEEV KUMAR JINDAL;
HERMIONE MIMI PIERRE JOHNSON;
NEERAJ KUMAR; KAREN M. MONTALBANO;
EILEEN M. NAPOLITANO; OLENA NICKS;
DEBORAH M. PASTERNAK; CARMEN J. PINEYRO;
DANNY S. QIAO; LAURIE SCOTT;
RAJA KANWAR SINGH; AMIL VIRANI;
MARY G. VOLOSEVICH;
and the NASSAU DEMOCRATIC COUNTY COMMITTEE,

VERIFIED ANSWER

Plaintiffs,

-against-

NASSAU COUNTY; the NASSAU COUNTY LEGISLATURE;
the NASSAU COUNTY BOARD OF ELECTIONS;
JOSEPH J. KEARNY, in his official capacity as a commissioner
of the Nassau County Board of Elections; and JAMES P. SCHEUERMAN,
in his official capacity as a commissioner of the Nassau County Board
of Elections,

Defendants,

-----X

Defendant, JAMES P. SCHEUERMAN, in his official capacity as a commissioner of the

Nassau County Board of Elections, answers Plaintiffs' Complaint as follows:

1. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 1 of the Complaint.
2. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 2 of the Complaint.

3. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 3 of the Complaint.

4. Paragraph 4 of the Complaint states a conclusion of law and, to the extent it requires a response, Plaintiff denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 4 of the Complaint.

5. Paragraph 5 of the Complaint states a conclusion of law and, to the extent it requires a response, Plaintiff denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 5 of the Complaint.

6. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 6 of the Complaint.

7. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 7 of the Complaint.

8. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 8 of the Complaint.

9. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 9 of the Complaint.

10. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 10 of the Complaint.

11. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 11 of the Complaint.

12. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 12 of the Complaint.

13. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 13 of the Complaint.

14. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 14 of the Complaint.

15. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 15 of the Complaint.

16. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 16 of the Complaint.

17. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 17 of the Complaint.

18. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 18 of the Complaint.

19. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 19 of the Complaint.

20. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 20 of the Complaint.

21. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 21 of the Complaint.

22. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 22 of the Complaint.

23. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 23 of the Complaint.

24. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 24 of the Complaint.

25. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 25 of the Complaint.

26. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 26 of the Complaint.

27. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 27 of the Complaint.

28. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 28 of the Complaint.

29. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 29 of the Complaint.

30. Admits the allegations contained in Paragraph 30 of the Complaint.

31. Admits the allegations contained in Paragraph 31 of the Complaint.

32. Admits the allegations contained in Paragraph 32 of the Complaint.

33. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 33 of the Complaint.

34. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 34 of the Complaint.

35. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 35 of the Complaint.

36. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 36 of the Complaint.

37. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 37 of the Complaint.

38. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 38 of the Complaint.

39. Admits the allegations contained in Paragraph 39 of the Complaint.

40. Admits the allegations contained in Paragraph 40 of the Complaint.

41. Admits the allegations contained in Paragraph 41 of the Complaint.

42. Admits the allegations contained in Paragraph 42 of the Complaint.

43. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 43 of the Complaint.

44. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 44 of the Complaint.

45. Paragraph 45 of the Complaint states a conclusion of law and, to the extent it requires a response, Plaintiff denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 45 of the Complaint.

46. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 46 of the Complaint.

47. Paragraph 47 of the Complaint states a conclusion of law and, to the extent it requires a response, Plaintiff denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 47 of the Complaint.

48. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 48 of the Complaint.

49. Paragraph 49 of the Complaint states a conclusion of law and, to the extent it requires a response, Plaintiff denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 49 of the Complaint.

50. Paragraph 50 of the Complaint states a conclusion of law and, to the extent it requires a response, Plaintiff denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 50 of the Complaint.

51. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 51 of the Complaint.

52. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 52 of the Complaint.

53. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 53 of the Complaint.

54. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 54 of the Complaint.

55. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 55 of the Complaint.

56. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 56 of the Complaint.

57. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 57 of the Complaint.

58. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 58 of the Complaint.

59. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 59 of the Complaint.

60. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 60 of the Complaint.

61. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 61 of the Complaint.

62. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 62 of the Complaint.

63. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 63 of the Complaint.

64. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 64 of the Complaint.

65. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 65 of the Complaint.

66. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 66 of the Complaint.

67. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 67 of the Complaint.

68. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 68 of the Complaint.

69. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 69 of the Complaint.

70. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 70 of the Complaint.

71. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 71 of the Complaint.

72. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 72 of the Complaint.

73. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 73 of the Complaint.

74. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 74 of the Complaint.

75. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 75 of the Complaint.

76. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 76 of the Complaint.

77. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 77 of the Complaint.

78. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 78 of the Complaint.

79. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 79 of the Complaint.

80. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 80 of the Complaint.

81. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph 81 of the Complaint.

FIRST AFFIRMATIVE DEFENSE

82. Defendant, JAMES P. SCHEUERMAN, in his official capacity as a commissioner of the Nassau County Board of Elections (“Defendant”), at all applicable times herein, acted in performance of his duties, as employees of the Board of Elections in good faith and is immune from civil liability.

SECOND AFFIRMATIVE DEFENSE

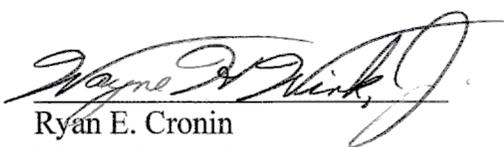
83. If the Plaintiffs sustained damages as alleged in the Complaint, such damages were not the result of any conduct on the part of Defendant.

THIRD AFFIRMATIVE DEFENSE

84. Defendant reserves the right to amend this pleading to assert additional affirmative defenses.

Dated: Mineola, New York
August 30, 2023

Respectfully submitted,

By: 
Ryan E. Cronin
Wayne H. Wink
Michael M. Freeman
*Attorneys for Defendant JAMES P.
SCHEUERMAN, in his official
capacity as a commissioner of the
Nassau County Board of Elections*
240 Old Country Road
Mineola, New York 11501
(516) 571-2411

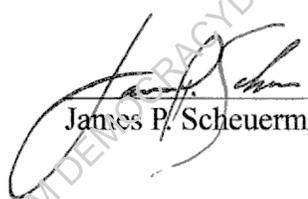
VERIFICATION

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

I, JAMES P. SCHEUERMAN, having been duly sworn, depose and say:

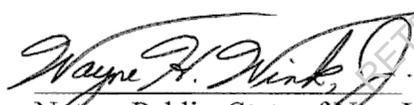
I am a defendant in this action solely in my official capacity as Commissioner of the Nassau County Board of Elections. I have read the foregoing Answer and verify that the statements therein are true to the best of my knowledge, information, and belief.

Executed this 30th day of August, 2023.



James P. Scheuerman

Sworn before me this
30th day of August, 2023



Notary Public, State of New York

