

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF STEUBEN

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 :  
 TIM HARKENRIDER, GUY C. BROUGHT, :  
 :  
 LAWRENCE CANNING, PATRICIA CLARINO, :  
 :  
 GEORGE DOOHER, JR., STEPHEN EVANS, :  
 :  
 LINDA FANTON, JERRY FISHMAN, JAY :  
 :  
 FRANTZ, LAWRENCE GARVEY, ALAN :  
 :  
 NEPHEW, SUSAN ROWLEY, JOSEPHINE :  
 :  
 THOMAS, AND MARIANNE VOLANTE, :  
 :

Index No.: E2022-0116CV

**AFFIDAVIT OF**  
**WILLIAM NOEL**Petitioners, :  
:  
:v. :  
:  
:

GOVERNOR KATHY HOCHUL, LIEUTENANT :  
 :  
 GOVERNOR AND PRESIDENT OF THE :  
 :  
 SENATE BRIAN A. BENJAMIN, SENATE :  
 :  
 MAJORITY LEADER AND PRESIDENT PRO :  
 :  
 TEMPORE OF THE SENATE ANDREA :  
 :  
 STEWART-COUSINS, SPEAKER OF THE :  
 :  
 ASSEMBLY CARL HEASTIE, NEW YORK :  
 :  
 STATE BOARD OF ELECTIONS, AND THE :  
 :  
 NEW YORK STATE LEGISLATIVE TASK :  
 :  
 FORCE ON DEMOGRAPHIC RESEARCH AND :  
 :  
 REAPPORTIONMENT, :  
 :

Respondents. :  
:  
:

-----X  
 STATE OF NEW YORK )  
 ) ss.:  
 COUNTY OF PUTNAM )

I, William Noel, being duly sworn, depose and state the following:

1. I am a citizen of the State of New York, residing at 66 Lacrosse Road, Carmel, NY 10512 in Putnam County. I am registered to vote in the State of New York.

2. I am the Chief of Staff of the Parent Party of New York (the "Parent Party"). One of my key responsibilities is to vet, recruit, and select candidates (a) to be endorsed by the Parent Party; and (b) to participate in the independent nominating process so as to get any endorsed

candidates on the ballot on the Parent Party line in the November 8, 2022 General Election.

3. The Parent Party has been recruiting candidates to run for various offices, including (a) Statewide offices; (b) Representative in Congress; (c) State Senate; (d) State Assembly; and (e) local offices on the county level, including County Clerk and County Legislator.

4. The entire redistricting process and the ongoing litigation has interfered with the Parent Party's ability to recruit candidates and circulate petitions. This interferes with the Parent Party's attempt to (a) get Parent Party candidates to get on the ballot and (b) for the Parent Party to qualify as a ballot access party in the State of New York.

5. On May 3, 2022, I traveled to the main office of the New York State Board of Elections (the "Board of Elections") located in Albany, New York. While I was at the office of the Board of Elections, I spoke with three individuals at the main/filing desk. Given the uncertainties surrounding the ongoing redistricting litigation, I asked these three individuals what the process would be for the independent nominating petitions, particularly since many of the districts were unknown. The three officials at the Board of Elections told me that they did not know what the process would be for independent nominating petitions and stated that it is up to the courts. They further informed me that they were waiting for the courts to create a political calendar for the independent nominating petition process.

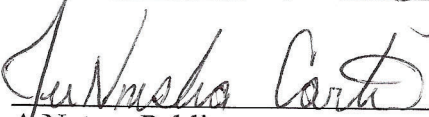
6. Given the lack of guidance provided to me by officials at the New York State Board of Elections, and the fact that many of the district maps were unknown, I left their office not knowing what actions the Parent Party should take in connection with the independent nominating petition process. In fact, it was unclear, if the Parent Party started gathering signatures for the independent nominating process, whether those signatures would even be considered to be valid.

7. I have not submitted any prior application for the relief I seek.

  
William Noel

Sworn to and subscribed before me

this 15<sup>th</sup> day of May 2022.



A Notary Public

