

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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JULIO PENA III, AKEL WILLIAMS,
JILLIAN CARA GOGER, and JOHNNY SAGAN
Petitioners,

-against-

VERIFIED PETITION

RODNEYSE BICHOTTE HERMELYN, in her capacity
as Chair of the Kings County Democratic County
Committee Executive Committee; KINGS COUNTY
DEMOCRATIC COUNTY COMMITTEE; and KINGS
COUNTY DEMOCRATIC COUNTY COMMITTEE
EXECUTIVE COMMITTEE, the NEW YORK STATE
DEMOCRATIC COMMITTEE and ANTHONY BECKFORD,
MICHELLE TEGE, DOUG SCHNEIDER, LYDIA BELLA GREEN,
ARLENY ALVARADO-MCCALLA, HERIBERTO MATEO,
KENESHA TRAYNHAM-COOPER, HENRY BUTLER,
MICHAEL BOOMER, MERCEDES NARCISSE,
And ROXANNE PERSAUD in their capacities as
Former State Committee Members and Former Members of
the Kings County Democratic County Committee Executive
Committee

Index _____/2026

Respondents

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Petitioners JULIO PEÑA III, AKEL WILLIAMS, JILLIAN CARA GOGER, and JOHNNY
SAGAN by their attorneys, Mark Hanna, Esq., of Khalifeh & Strupinsky, PC, Howard Graubard,
Esq., and Paul D. Newell, Esq. respectfully petition this Court for injunctive and declaratory
relief and allege as follows:

PRELIMINARY STATEMENT

1. On June 23, 2026, Democratic Party voters in Kings County elected a slate of
State Committee members (commonly known as “District Leaders”), including Petitioners Julio
Pena III and Akel Williams herein. In the process, 11 incumbent State Committee Members from
the County of Kings were replaced.

2. Under the then-existing rules, the 42 State Committee Members (2 for each
Assembly District) would thereafter form the membership of the Executive Committee of Kings
County Democratic County Committee (“KCDCC”), which, among other things, selects the
County Committee Executive Committee Chair (or “Party Chair”), currently Respondent

Rodneyse Bichotte Hermelyn (“Bichotte Hermelyn”). Subsequently, a majority of the District Leaders elected on June 23, 2026, indicated that they intended to vote to replace Bichotte Hermelyn with Petitioner Julio Peña III (“Peña”) as Party Chair.¹

3. However, in an 11th hour undemocratic gambit to cling to power, on extremely short notice (See **Exhibit A**, Special Meeting Notice), Bichotte Hermelyn called a meeting of the “lame duck” Executive Committee to vote on a series of 10 proposed amendments to the KCDCC Bylaws that would have the effect of nullifying the will of Brooklyn’s voters by permitting her to expand the Executive Committee with 48+ unelected members appointed by her.²

4. Despite the expressed profound objections of senior elected Democratic officials—including all three City-wide elected officials (Mayor Zohran Mamdani, Public Advocate Jumaane Williams, Comptroller Mark Levine), Governor Kathy Hochul and Attorney General Leticia James, U.S. Senate Minority Leader Charles Schumer, House Minority Leader Hakeem Jeffries, and numerous Brooklyn Assemblymembers, Senators, and Councilmembers as well as the Chair of the NY State Democratic Committee, Jay Jacobs— Respondents Bichotte Hermelyn and the KCDCC Executive Committee, convened a purported “Special Meeting” on August 25, 2026. At this meeting, 8 persons who had been voted out of office on June 23, 2026, as well as 3 persons who did not seek re-election and were replaced in office by successors, were nonetheless permitted to vote on the amendments. All eight of the defeated incumbents voted in favor of the resolutions, which passed by margins of merely one or two votes.

5. An outgoing party leadership cannot and certainly should not rewrite the rules on the eve of the organizational meeting to change the electorate before that electorate has the opportunity to vote. Democracy means letting the members vote, not altering the electorate before they do so, in order to game out a result that is more favorable to those in power. Yet, the amendments adopted on August 25, 2026, substantially alter the composition and voting membership of the Executive Committee, including by expanding the electorate eligible to select the next Party Chair and altering the voting rules for the incoming County Committee. These

¹<https://www.cityandstateny.com/politics/2026/08/new-kingmaker/415444/>

² There are 42 elected members of the executive board, so the number of members appointed by the chair or otherwise unelected far outnumbers the number of elected members, and grows with each subsequent chair resignation, as one of the purported amendments makes former chairs voting members for life.

changes were adopted after the primary election but before organizational meeting of the newly elected County Committee has had the opportunity to organize.

6. Petitioners in this special proceeding seek urgent injunctive and declaratory relief nullifying the purported adoption of the Amendments at the August 25, 2026 purported “Special Meeting.” They were adopted by the votes of persons whose terms in office had ended and were and are no longer entitled to participate in such voting on substantial matters and they were adopted by a body in the intervening period between the election and the organizing meetings of the newly elected County Committee and its Executive Committee.

7. The Amendments effectively and permanently eliminate any viable ability of the rank and file members of the Democratic Party in Brooklyn to have a voice in the leadership of their own party.

PARTIES

8. Petitioner Julio Peña III (“Peña”) is a duly enrolled member of the Democratic Party, a district leader, a member of the KCDCC Executive Committee, a member of the New York Democratic State Committee, and a County Committee Member in Assembly District 51, Kings County, New York.

9. Petitioner Akel Williams is a duly enrolled member of the Democratic Party and a newly elected member of the New York Democratic State Committee in Assembly District 43, Kings County, New York.

10. Petitioner Jillian Cara Goger is a duly enrolled member of the Democratic Party and a newly elected County Committee Member in Assembly District 51, Kings County, New York.

11. Petitioner Johnny Sagan is a duly enrolled member of the Democratic Party and a newly elected County Committee Member in Assembly District 43, Kings County, New York.

12. Respondent Rodneyse Bichotte Hermelyn is sued in her capacity as Chair of the KCDCC Executive Committee. In that capacity, she is responsible for convening, presiding over, and directing the business of the Executive Committee, and has noticed and organized the August 25, 2026 “Special Meeting” that is the subject of this proceeding.

13. Respondent Kings County Democratic County Committee (“KCDCC”) is the county committee of the Democratic Party in Kings County, New York.

14. Respondent Kings County Democratic County Committee Executive Committee is the executive committee of the County Committee and purports to exercise authority on behalf of the County Committee between meetings.

15. Respondent New York State Democratic Committee (“NYSDC”) is the duly constituted State Committee of the New York State Democratic Party empowered to enforce its Party Rules on all subsidiary and County Democratic committees within New York State.

16. Respondents Anthony Beckford, Michelle Tege, Doug Schneider, Lydia Bella Green, Arleny Alvarado-McCalla, Heriberto Mateo, Kenesha Traynham-Cooper, Henry Butler, Michael Boomer, Mercedes Narcisse, and Roxanne Persaud are outgoing, former members of the Democratic State Committee and the Kings County Democratic County Committee Executive Committee. (Collectively, the “outgoing members”)

JURISDICTION AND VENUE

17. This Court has jurisdiction over this proceeding and may grant injunctive and declaratory relief.

18. Judicial intervention in internal political party matters is warranted upon a showing that party leaders violated the Election Law or the party’s own rules, or otherwise violated the rights of party members or the electorate. *Matter of Wong v Cooke*, 87 A.D.3d 659, 660 (2d Dep’t 2011). Courts will act to protect the rights of committee persons to be present and to vote at committee meetings. *Matter of Auerbach v Suffolk County Comm. of the Conservative Party*, 171 A.D.3d 731, 737 (2d Dep’t 2019).

19. Venue is proper in Kings County because the material events giving rise to this proceeding occurred or will occur in Kings County, and Respondent KCDCC’ principal offices are located in Kings County.

FACTS

20. Members of state and county committees are elected at the primary election, and members hold office until the next election at which members of the committee are elected. *NY Election Law § 2-106(4)* (“Members shall hold office until the next election at which members of the committee are elected.”).

21. Under the Party Bylaws which existed at the time of the August 25, 2026 “Special Meeting,” the only members of the KCDCC Executive Committee are *elected* State Committee Members.

22. Under New York law and party rules, outgoing, nonelected members of the KCDCC Executive Committee lack voting rights because their legal authority terminates upon the election of their successors at the primary election.

23. An election for County Committee Members and State Committee members in Kings County was held on June 23, 2026.

24. At the June 23, 2026 election, new County Committee Members and State Committee members were elected in various assembly districts throughout Kings County.

25. Said June 23, 2026 elections were considered a seismic win for “reform” forces who explicitly campaigned against Respondent Bichotte Hermelyn’s continued Chairship. The reformers won eight of nine such contested elections, securing a majority of voting members on the Executive Committee.³

26. Petitioner Julio Pena III was re-elected as a member of the New York Democratic State Committee in Assembly District 51.

27. Petitioner Akel Williams was newly elected as a member of the New York Democratic State Committee in Assembly District 43.

28. Petitioner Jillian Cara Goger was newly elected as a County Committee Member in Assembly District 51.

29. Petitioner Johnny Sagan was newly elected as a County Committee Member in Assembly District 43.

30. As a result of the elections held on June 23, 2026, certain persons who previously served on the KCDCC Executive Committee are no longer members of the County Committee, the State Committee, or both. In particular, the following 11 persons lost their bids for election or re-election, or did not seek re-election to the State Committee (collectively, the “outgoing members”):

- a. Anthony Beckford
- b. Michelle Tege

³ See <https://www.cityandstateny.com/politics/2026/06/reformers-clinch-majority-brooklyn-dl-seats-threatening-rodneise-bichotte-hermelyns-power/414403/>.

- c. Doug Schneider
- d. Lydia Bella Green
- e. Arleny Alvarado-McCalla
- f. Heriberto Mateo
- g. Kenesha Traynham-Cooper
- h. Henry Butler
- i. Michael Boomer
- j. Mercedes Narcisse
- k. Roxanne Persaud

31. Rather than accept the “seismic” election of new members of the Executive Committee⁴, Respondent Bichotte Hermelyn, acting in her capacity as Chair of the Executive Committee, in concert with the other Respondents, noticed a meeting of the KCDCC Executive Committee to be held on Tuesday, August 25, 2026. (See **Exhibit A**, Special Meeting Notice).

32. The sole purpose of said “Special Meeting” was to undermine and nullify the results of the June 23, 2026 election at which allies of Respondent Bichotte Hermelyn were so resoundingly rejected by Brooklyn Democratic voters.

33. The Special Meeting Notice stated that the Executive Committee would be voting on amendments to the Party’s bylaws which constituted substantial changes to the governance, officer actions, committee actions, changes to who may vote for the next Chairperson of the Executive Committee, and other substantial matters before the Organizing Meeting occurs. The specific proposed rule changes or substantial matters are set forth in **Exhibit C**.

34. The proposed actions included, *inter alia*,

- a.* Amendments (Proposals 2, 3, and 4) that would illegally create upwards of 48 additional unelected members of the Executive Committee who would be appointed by the Party Chair with no input from the Democratic Party electorate.
- b.* An amendment (Proposal 2) that would make any and all former Chairs of the Executive Committee automatically a voting officer of the County Committee, even if no longer holding elected office. The current exclusive beneficiary of

⁴ Or try to persuade enough of the democratically elected leaders to support her.

this Rule Amendment is Former Party Chair Clarence Norman, who was removed from office after being convicted of felonies for accepting illegal campaign contributions.

- c. Amendments (Proposals 7, 8) which removes the ability of local Assembly District Leaders to create Assembly District Committees and vests all authority to set the time/place/location of these local committees in the Executive Committee and specifically the Chair of the Executive Committee (currently Respondent Bichotte Hermelyn).
- d. An amendment (Proposal 10) which would provide that “[a]ny amendment to these Rules regarding proxies and their utilization by the County Committee or any standing or subcommittee thereof shall require the vote of eighty five percent (85%) of the entire body eligible to vote, thereupon.”

35. Those proposed actions were substantial because they would purport to alter the rules, governance, operations, powers, membership rights, committee structure, officer authority, election procedures, voting eligibility, chair-selection process, endorsement procedures, meeting procedures, or other material affairs of the County Committee before the newly elected County Committee Members have the opportunity to participate in the Organizing Meeting.

36. In the short 5 days between the announcement of the Special Meeting and its convening on August 25, 2026, a wide swath of elected Democratic officials and nominees strongly condemned the proposal and called on Bichotte Hermelyn to cancel the “Special Meeting.” These included: *inter alia*,

- a. New York Governor Kathy Hochul,
- b. New York Attorney General Leticia James,
- c. New York City Mayor Zohran Mamdani,
- d. New York City Public Advocate Jumaane Williams,
- e. New York City Comptroller Mark Levine,
- f. United States Senate Minority Leader Charles Schumer,
- g. United States House of Representatives Minority Leader Hakeem Jeffries,
- h. Congressmembers Nydia Velasquez and Dan Goldman
- i. Congressman nominees Brad Lander, Claire Valdez and Mike Decillis.

- j. Numerous New York State Senators including Andrew Gournardes and Julia Salazar
- k. Numerous New York Assemblymembers, including Jo Anne Simon and Robert Carroll
- l. Numerous New York City Councilmembers including Shahan Hanif, Lincoln Restler, Alexa Aviles, Kayla Santosuosso and Sandy Nurse
- m. Jay Jacobs, Chair of the New York State Democratic Committee

37. On August 24, 2026, prior to the meeting, Petitioners commenced a related proceeding by filing a Verified Petition and a proposed Order to Show Cause seeking a temporary restraining order blocking Respondents, *inter alia*, from convening the August 25, 2026, “Special Meeting.” The Court (Epstein, J.) declined to sign the Order to Show Cause, indicating in a written endorsement “Decline to sign. Premature. May be refiled after the meeting.” (**Exhibit D**, Order to Show Cause declination)

38. On August 25, 2026, Respondents convened a “Special Meeting” at the headquarters of the Thomas Jefferson Democratic Club in Brooklyn.

39. At the August 25, 2026, meeting, the following 11 former State Committee Members, who had lost their bids for election or re-election to the State Committee or who declined to seek re-election and whose terms of office had therefore expired, were permitted by Respondents to attend and vote:

- a. Anthony Beckford
- b. Michele Tege
- c. Doug Schneider
- d. Lydia Bella Green
- e. Arleny Alvarado-McCalla
- f. Heriberto Mateo
- g. Kenesha Traynham-Cooper
- h. Henry Butler
- i. Michael Boomer
- j. Mercedes Narcisse
- k. Roxanne Persaud

40. Members of the public, members of the Democratic Party who were not on a special list of attendees created, upon information and belief by the Party Chair, and news media, were not permitted to enter or otherwise view the August 25, 2026 special meeting.⁵

41. At the August 25, 2026, meeting, the Amendments propounded by Respondents were adopted. The following 10⁶ former State Committee Members, who had either lost their bids for re-election to the State Committee or declined to seek re-election and whose terms of office had therefore expired on June 23, 2026, voted on the Amendments:

- a. Anthony Beckford
- b. Michele Tege
- c. Doug Schneider
- d. Lydia Bella Green
- e. Arleny Alvarado-McCalla
- f. Heriberto Mateo
- g. KeneshaTraynham-Cooper
- h. Henry Butler
- i. Michael Boomer
- j. Mercedes Narcisse

42. The votes of the members who voted improperly were dispositive for all of the amendments that were passed. In particular, the vote on who would constitute the new Executive Committee, resulted in a vote in favor of 21 yes to 19 no, with one abstention. However, if only the members still eligible to vote were the electorate, the vote would have been 13 yes, to 17 no and one abstention. Without the illegal votes of these Former State Committee Members, each and every one of the proposed amendments would have failed.

43. Petitioners further seek relief because the August 25, 2026 meeting was improperly conducted in executive session without the majority vote required by Article V, Section 12 of the Kings County Democratic County Committee Bylaws and Robert's Rules of Order. Because the meeting was therefore a public meeting, it was subject to the Party Rules of

⁵See, e.g. <https://x.com/JCColtin/status/2092364035958223056>.

⁶ Former State Committee Member Roxanne Persaud did not attend and did not submit a proxy and therefore did not vote.

the Democratic State Committee of New York, which require that all public meetings at all levels of the Democratic Party of New York be open to all party members and that the time and place for all public meetings be publicized fully and in such manner as to assure timely notice to all interested persons. (Party Rules of the Democratic State Committee, <https://www.nydems.org/about/rules>) The August 25, 2026 meeting was not held publicly, nor was it noticed by publication as required by the Party Rules. The NYSDC, in being tasked with the duty to enforce its own rules, is therefore accountable for this failure of its subsidiary to follow these rules.

ARGUMENT

A. The August 25, 2026 Executive Committee Special Meeting improperly allowed the Former State Committee Members to vote.

44. Members of state and county committees are elected at the primary election, and members hold office until the next election at which members of the committee are elected. *NY Election Law § 2-106* and *Matter of Gibbs v. Manhattan Democratic Party*, 226 A.D.3d 590, 590 (1st Dep’t 2024).

45. Every county committee must meet no earlier than September 17 and no later than October 6 following the June primary. Until that organization meeting, the existing county committee exercises legal authority, and upon the conclusion of that organization meeting, the new county committee assumes all legal authority vested in the previously organized county committee. *NY Election Law § 2-112* (2019).

46. Although the new county committee assumes all legal authority vested in the previously organized county committee, this statutory authority does not grant the outgoing, non-elected members of the KCDCC Executive Committee any special continuing authority.

47. Article V, § 1 of the KCDCC Bylaws (**Exhibit B**) provides that the Executive Committee is a standing committee of the County Committee and is composed of State Committee members elected from Kings County, persons elected by the Executive Committee to fill vacancies in its membership resulting from vacancies in the State Committee, and the Chairperson, Secretary, Treasurer, and Assistant Treasurer of the County Committee.

48. Article V, § 1 further provides that “only persons elected as State Committee members and persons elected by the Executive Committee to fill vacancies in its membership resulting from vacancies on the State Committee are authorized to vote.” (Exhibit B, KCDCC Bylaws – emphasis added)

49. The Bylaws therefore distinguish between nonvoting officers who may be part of the Executive Committee by virtue of office and voting members whose voting authority depends on their status as elected State Committee members from Kings County or as properly selected vacancy-fillers for State Committee vacancies.

50. Because Election Law § 2-106 provides that members of state and county committees are elected at the primary election and hold office only until the next election at which members of the committee are elected, persons who lost election or re-election or declined to run for re-election to the State Committee at the 2026 primary election no longer hold the State Committee office that Article V, § 1 requires for Executive Committee voting rights.

51. Notwithstanding, Respondents permitted persons who no longer were authorized to vote on the Executive Committee to participate and vote at the August 25, 2026 “Special Meeting” – and their unauthorized votes, specifically, were dispositive of passing the rules amendments.

52. Without the illegal votes of these Former State Committee Members, each and every one of the proposed amendments would have failed.⁷

53. Respondents’ actions violated the party’s own Bylaws by allowing persons without present voting status under Article V, § 1 to vote on Executive Committee business.

54. A party’s internal organization and authority are governed by party rules except where expressly governed by legislation, and courts may enforce party rules where party leaders violate them. *Matter of Independence Party State Comm. of the State of New York v. Berman*, 28 A.D.3d 556, 557 (2d Dep’t 2006), *Matter of Wong v Cooke*, 87 A.D.3d 659, 660 (2d Dep’t 2011).

55. Accordingly, all votes at the August 25, 2026 “Special Meeting” were unlawful, invalid, and void to the extent that they included, counted, or depended upon votes cast by persons who lost their State Committee elections at the 2026 primary election, declined to seek

⁷This is true even without including the Former State Committee Members’ duly elected successors – each one of whom has publicly stated their opposition to these rules amendments.

re-election and/or who were not otherwise properly selected to fill qualifying State Committee vacancies under Article V, § 1 of the Bylaws.

B. The outgoing Executive Committee may not exercise authority over substantial matters prior to the County Committee Organizational Meeting

56. With the election of a new County Committee in a primary election, the old County Committee becomes “functus officio,” that is, a person whose job had been completed and who could no longer perform major functions. *Matter of Torchin v. Cohen*, 286 N.Y. 544, 547 (1941) and *Matter of McDonald v. Heffernan*, 300 N.Y. 488 (1949). No rule of the old county committee may extend the authority of its executive committee to continue exercising functions in substantial matters after successors have been elected. *Matter of Cox v. Spoth*, 165 A.D.3d 1648, 1650 (4th Dep’t 2018).

57. The filling of vacancies for a newly elected County Committee is a "substantial matter," and therefore the actions of an outgoing Executive Committee in filling vacancies in the new County Committee are improper. *Matter of Auerbach v. Suffolk County Comm. of the Conservative Party of N.Y. State*, 159 A.D.3d 695, 697 (2d Dep’t 2018); *Matter of Brocato v. Tinari*, 157 A.D.3d 782, 784 (2d Dep’t 2018); *Mazur v. Kelly*, 170 A.D.2d 1037, 1037 (4th Dep’t 1991). Similarly, changing the composition and voting rights of the body that will select the next Executive Committee Chair is a substantial matter that outgoing members may not undertake.⁸

58. *NY Election Law § 2-112* creates only a limited continuity rule under which the existing county committee exercises legal authority in the intervening period between the primary and the statutory organizational meeting. The new county committee assumes that authority upon conclusion of the organizational meeting. The legal authority is and should be nominal and for the purpose of having the authority to convene that organizing meeting and for emergencies that would be impossible to convene a meeting for.

59. As declared in *Ellington v Kings County Democratic County Comm.*, 70 Misc. 3d 311 (Sup. Ct Kings Co., 2020), “[N]othing in this language [of Election Law § 2-112] gives the Executive Committee authority... to act in the stead of the county committee on any substantial matter when there are means of holding such a meeting.” *Id.* 70 Misc. 3d at 312 footnote 7.

⁸Indeed, it is hard to imagine a more substantial act under this context.

60. That same Court further elaborated in *Stein v. Kings County Democratic County Committee*, 2020 NY Slip Op 34204(U) (Sup. Ct. Kings Co. 2020), reversed on other grounds, 206 A.D.3d 845 (2d Dep’t 2022), that, “... the amendment to §2-112(b)(1) **only allows action by the prior County Committee, not the Executive Committee.**” 2020 NY Slip Op 34204(U) at 13 (emphasis added)

61. The issue here is the same as it was in 2020 in *Ellington* and *Stein*. The same statutory framework that preserves interim continuity also recognizes that, upon the election of successors at the primary, outgoing members are no longer empowered to exercise functions in substantial matters. *Matter of Gibbs v. Manhattan Democratic Party*, 226 A.D.3d 590, 592 (1st Dep’t 2024) (declaring the subject party committee meeting invalid because “the notice for the organizing meeting should have been sent to the members elected in the June 2023 primaries, not the outgoing 2022 members.”).

62. Respondents may not use the interim period to permit an outgoing or improperly constituted Executive Committee to vote on substantial rules amendments affecting the incoming County Committee, incoming State Committee Members, newly elected Executive Committee members, proxy rights, and the rules governing the organizational meeting.

63. Respondents’ actions did precisely what New York law and the Courts have historically forbidden: allowing an outgoing Executive Committee to act in the place of the County Committee on substantial matters when the County Committee can meet.

64. The Appellate Division has recognized only a narrow exception where it was effectively impossible to canvass and certify newly elected committee members, convene an organizational meeting, elect a new executive committee, and file a proper certificate within the applicable time frame. *Matter of Cox v Spoth*, 165 A.D.3d 1648, 1650 (4th Dep’t 2018) (citing *Matter of Settineri v. DiCarlo*, 82 N.Y.2d 813, 815 (1993)).

65. No such impossibility exists here. The County Committee Organizing Meeting can be held within the statutory period, and Respondents never identified any emergency requiring outgoing members or nonqualified Executive Committee voters, on short notice, to rewrite party rules or alter who may vote for the next Chair before the newly elected members meet.

66. Respondents therefore cannot convert § 2-112's temporary continuity rule into a license for outgoing members to alter voting rights, governance rules, or the electorate for the next Chair before the newly elected members organize.

67. Permitting outgoing members or persons who lack voting rights under Article V, § 1 to adopt or approve substantial changes during the interim period between the primary election and the Organizing Meeting impairs the rights of Petitioners and other newly elected members —to say nothing of the Democratic voters of Kings County — and must not be allowed.

**C. The Bylaws Do Not Permit Circumvention of the County Committee Rules-
Amendment Process**

68. The KCDCC bylaws create a process by which rules amendments may be made in the normal course of business for the Party that the Respondents have superseded with their actions at the August 25, 2026 “Special Meeting.”

69. Article III(1)(A) of the KCDCC Bylaws provides that proposed amendments to the Rules must include the full text of the amendment to be voted upon at an organizational meeting of the County Committee, must be in writing, and must be signed by a duly elected member. It further provides that such motions must be filed with the designated person at the location and address, and by the date and time certain, specified in the notice of the organizational meeting. The notice of the organizational meeting is the procedural document that fixes the filing deadline, filing location, and person with whom amendments must be filed.

70. Article VI(5)(1) requires the Rules Committee to meet no less than ten days before the organizational meeting to study and recommend the adoption of the rules. The Rules Committee is not given authority to vote any rules amendments into effect. Its role is to study, recommend, and report.

71. Article X provides that the Rules may be amended from time to time by a majority of the members of the County Committee, or when the County Committee is not in session, by a majority of the members of the Executive Committee present at a meeting at which there is a quorum, provided that a copy of the proposed amendments is sent with the notice of the meeting at which the amendments are to be proposed, on not less than five days’ notice, mailed to the post office address of each member of the Committee.

72. The Election Law similarly provides that rules may be amended by majority vote of the members of the committee present at a meeting at which there is a quorum, provided that a copy of the proposed amendment is sent with the notice of the meeting at which the amendment is to be proposed, and that such notice is mailed not less than five days before the meeting to each member of the committee. NY Election Law § 2-114.

73. Read together, Articles III, VI, and X establish a sequential process for rules amendments in connection with the County Committee organizational meeting: proposed amendments are filed by a duly elected member; the Rules Committee meets at least ten days before the organizational meeting to study and recommend the rules; and the proposed amendments are then presented to the County Committee for a vote at the organizational meeting.

74. Article X's reference to Executive Committee action when the County Committee is not in session should not be used to displace the organizational-meeting process before the County Committee has organized. That clause governs ordinary periods after organization when the County Committee is not in session. It should not be read to permit an outgoing or improperly constituted Executive Committee to preempt the newly elected County Committee before the organizing meeting occurs.

75. Respondents' actions at the August 25, 2026 "special meeting," purport to have approved rules amendments before the filing, review, notice, recommendation, and County Committee vote contemplated by Articles III, VI, and X, thus nullifying the Bylaws' procedural safeguards and substituting an outgoing and improperly constituted Executive Committee's action for the vote of the entire County Committee.

76. The harm is not procedural only. The Executive Committee's purported adoption of rule amendments at the August 25, 2026 "special meeting," are intended to be treated as immediately effective upon filing and will be used to govern the September organizational meeting. That result will allow the outgoing **AND** improperly constituted Executive Committee to decide the rules under which the incoming County Committee organizes itself, which violates the election law and the party bylaws.

D. The Purported Amendments Violate Both The Spirit And Letter Of The Election Law By Removing All Possibility Of Democratic Governance Of The Kings County Democratic Party

77. The plain purpose and intent of Election Law 2-106 (“Members of the state and county committees shall be elected...”), and indeed the entirety of Article 2, is that standing Political Parties in New York State must be democratically governed via elected committees.

78. The Court of Appeals has long held that “There is but one way to gain membership [in a governing Party Committee] and that is through the suffrages of the members of the party exercised ‘at the primary elections on the annual primary day.’” *People ex rel. Coffey v Democratic Gen. Comm.*, 164 NY 335, 342 (1900).

79. “In other words, the [statutory] scheme is to permit the voters to construct the [party] organization from the bottom upwards, instead of permitting leaders to construct it from the top downwards.” *In re Roosevelt*, 4 NY2d 19, 22 (1958).

80. Courts have long held that:

“The dominant idea pervading the entire statute is the absolute assurance to the citizen that his wish as to the conduct of the affairs of his party may be expressed through his ballot and thus given effect, whether it be in accord with the wishes of the leaders of his party or not, and that thus shall be put in effective operation, in the primaries, the underlying principle of democracy, which makes the will of an unfettered majority controlling. In other words, the scheme is to permit the voters to construct the organization from the bottom upwards, instead of permitting leaders to construct it from the top downward.” *Theofel v Butler*, 134 Misc 259, 263 (Sup Ct, Queens County 1929).

81. Similarly, “The purpose of the statutory provision for a party county committee is to insure the party management in the county by elected representatives of the party. This purpose may not be evaded by the creation of an executive committee consisting of others than elected representatives of the party and the delegation to such committee of the conduct of the party business and affairs. All provisions of the rules to the contrary are illegal and void.” *Thayer v Ganter*, 174 Misc 394, 396-397 (Sup Ct, Westchester Co 1940).

82. The purported amendments here — by permitting more appointed members than elected ones — make a mockery of the legislature’s intent and jurisprudence requiring democratic governance of political parties.

83. The proposed amendments take the voters entirely out of the equations. Even if all 42 elected State Committee Members voted to remove the Chair, they would be outvoted by the Chair’s appointed members.

84. Indeed, even were the Chair herself to lose reelection to the State Committee, she would, under these amendments, remain a voting member as a former Chair — and her appointed lackeys could continue to thumb their noses at rank-and-file Brooklyn Democrats and re-elect her as Chair indefinitely.

85. “It is fundamental that a statute must be read with the legislative goal in mind, so that controversies generated by ambiguities or gaps in the law may be resolved in accordance with the legislative scheme. (See 1 Kent Commentaries 462.) Courts are obligated to apply a statute to the extent possible to accomplish its purpose and to avoid incongruous, unreasonable, or unjust results.” *Pell v Coveney*, 37 NY2d 494, 496 (1975).

86. Such complete and total obliteration of democratic participation in the governance of the largest party in the largest county in the State is, without doubt, an “incongruous, unreasonable, [and] unjust result.” *Id.*

87. Proposal 2, for instance, is otherwise entirely facially invalid because it explicitly states that Executive Committee members cannot be eligible for election as an officer. Election Law 2-112(2) requires only that the officers be enrolled members of the party and Courts have invalidated comparable restrictions. *Matter of Wohl v. Rockland County Republican Comm.*, 2024 NY Slip Op 33715(U) (Sup. Ct. Rockland Co. 2024).

88. Additionally, when the Executive Committee nominates a candidate for public office, fills a public-office nomination vacancy, or authorizes a nonparty candidate under Election Law §§6-114, 6-116, 6-120 or 6-148, it performs a public electoral function. Giving equal votes to *ex officio* or differently representative members violates the basic electoral principle of one-person-one-vote. *Seergy v Kings County Republican County Committee*, 459 F2d 308 (2d Cir. 1972).

89. Proposal 10 violates Election Law 2-114(2), which requires a simple majority vote for rules amendment votes. A county rule is invalid when it is “more restrictive than the

statute,” which is the case here. *Grancio v Coveney*, 60 NY2d 603 (1983). An 85% ultra-majority threshold is clearly substantially higher than 50%.

90. As such, even were these amendments legally adopted (and they were not), the Court must strike them as illegal, undemocratic, and incongruous with the election law.

E. The August 25, 2026 Meeting Was Improperly Conducted in Executive Session Without a Majority Vote, and as a Public Meeting, It Violated the Party Rules of the Democratic State Committee of New York

91. Article V, Section 12 of the KCDCC Bylaws (**Exhibit B**) states that meetings of the Executive Committee are public but may only go into executive session upon a majority vote of the body.

92. While the Chair can call special meetings at will, this does not grant the Chair authority to supersede party rules or Robert's Rules of Order.

93. *Robert's Rules of Order* Chapter IV 9:24 states: "A meeting enters into executive session only when required by rule or established custom, or upon the adoption of a motion to do so. A motion to go into (or out of) executive session is a question of privilege (19), and is adopted by a majority vote."

94. Upon information and belief, when the August 25, 2026 “Special Meeting” began, there was no vote to move into executive session.

95. Because no majority vote of the Executive Committee was taken to enter executive session as required by Article V, Section 12 of the Kings County Democratic County Committee Bylaws and Robert's Rules of Order Chapter IV 9:24, the August 25, 2026 meeting was a public meeting, regardless of the claims of the Party Chair.

96. Because the meeting was a public meeting, it implicates and is therefore governed by the Party Rules of the Democratic State Committee of New York.

97. Article I, Section 2(a) of the Party Rules of the Democratic State Committee of New York states: "All public meetings at all levels of the Democratic Party of New York are open to all members of the Democratic Party of New York regardless of race, sex, gender

identity, gender expression, age, color, creed, national origin, religion, ethnic identity, sexual orientation, disability, economic status or philosophical persuasion."⁹

98. Section 2(b) of the Party Rules of the Democratic State Committee of New York states that the "time and place for all public meetings of the Democratic Party of New York on all levels shall be publicized fully and in such manner as to assure timely notice to all interested persons."¹⁰

99. The August 25, 2026 meeting was not held publicly, nor was it noticed by publication as required by Section 2(b) of the Party Rules of the Democratic State Committee of New York.

100. By conducting the August 25, 2026 meeting in "executive session" without a majority vote to enter executive session, and by failing to hold the meeting publicly and to provide timely public notice of the meeting as required by Party Rules Sections 2(a) and 2(b), Respondents violated the Party Rules of the Democratic State Committee of New York and denied Petitioners and other members of the Democratic Party of New York the right to be present at and participate in the public meeting.

101. The violation of the Party Rules of the Democratic State Committee of New York is an independent basis for the Court to grant the relief requested in this Petition.

COUNT I — DECLARATORY RELIEF

102. Petitioners repeat and reallege paragraphs 1 through 101 as if fully set forth herein.

103. A justiciable controversy exists between Petitioners and Respondents regarding whether outgoing members of the Executive Committee may convene and exercise functions in substantial matters at the August 25, 2026 meeting before the 2026 Organizing Meeting.

104. A justiciable controversy also exists regarding whether Former State Committee Members who lost election or re-election or failed to seek re-election to the State Committee at the 2026 primary election may legally vote at the August 25, 2026 Executive Committee meeting under Article V, § 1 of the KCDCC Bylaws and Election Law § 2-106.

⁹See <https://www.nydems.org/about/rules> at p. 2.

¹⁰See <https://www.nydems.org/about/rules> at p. 2.

105. A justiciable controversy further exists regarding whether Respondents may use Proposal 10 or any comparable proposed rules amendment to circumvent the organizational-meeting rules-amendment process established by Articles III, VI, and X of the KCDCC Bylaws and the requirements of Election Law § 2-114.

106. A justiciable controversy exists between Petitioners and Respondents regarding whether these purported amendments can take effect by any means of adoption as they are incompatible with the election law.

107. Petitioners are entitled to a declaration that outgoing members of the Executive Committee may not exercise functions in substantial matters, including the adoption of rule changes, bylaw amendments, amendments to party rules, governance changes, officer actions, committee actions, changes to voting eligibility for the next Chair, or other substantial matters, during the period between the primary election and the County Committee Organizing Meeting.

108. Petitioners are also entitled to a declaration that only elected State Committee members from Kings County and persons properly elected by the Executive Committee to fill vacancies in Executive Committee membership resulting from vacancies in the State Committee may vote on the Executive Committee under Article V, § 1 of the KCDCC Bylaws.

109. Petitioners are additionally entitled to a declaration that Former State Committee Members who lost election or re-election or declined to seek re-election to the State Committee at the 2026 primary election are no longer State Committee members pursuant to Election Law § 2-106 and lack voting rights on the Executive Committee.

110. Petitioners are further entitled to a declaration that any substantial action purportedly adopted at the August 25, 2026 meeting is null, void, and of no force or effect if adopted by outgoing members, by persons lacking voting rights under Article V, § 1 of the Bylaws, or through votes cast by persons who were no longer State Committee members.

111. Petitioners are further entitled to a declaration that any rules amendment purportedly adopted at the August 25, 2026 meeting, including Proposal 10, may not be used to govern the 2026 County Committee Organizing Meeting or to alter the rights, procedures, voting rules, or governance structure applicable to the incoming County Committee.

112. Petitioners are further entitled to a declaration that any rules amendment(s) violating the statutorily required democratic governance of political parties is null, void, and of no force or effect.

113. Petitioners are further entitled to a declaration that the August 25, 2026 meeting was a public meeting because no majority vote was taken to enter executive session as required by Article V, Section 12 of the KCDCC Bylaws and Robert's Rules of Order Chapter IV 9:24, and that the meeting violated the Party Rules of the Democratic State Committee of New York by failing to be held publicly and to provide timely public notice as required by Party Rules Sections 2(a) and 2(b).

COUNT II — INJUNCTIVE RELIEF

114. Petitioners repeat and reallege paragraphs 1 through 113 as if fully set forth herein.

115. Respondent Rodneyse Bichotte Hermelyn, acting in her capacity as Chair of the Executive Committee, and the other Respondents have convened, conducted, and acted at the August 25, 2026 meeting through an Executive Committee that included outgoing Former State Committee Members and persons who lack present voting rights under Article V, § 1 of the KCDCC Bylaws.

116. Respondents acted on substantial matters before the 2026 County Committee Organizing Meeting, at which the newly elected County Committee Members are to organize and participate.

117. Petitioners are likely to succeed on the merits because outgoing members should not be permitted to exercise functions in substantial matters after the election of their successors and before the newly elected committee has organized. *Matter of Gibbs v. Manhattan Democratic Party*, 226 A.D.3d 590, 590 (1st Dep't 2024), *Matter of Cox v Spoth*, 165 A.D.3d 1648, 1650 (4th Dep't 2018), *Matter of Torchin v Cohen*, 286 N.Y. 544, 547 (1941).

118. Petitioners are also likely to succeed on the merits because Article V, § 1 of the KCDCC Bylaws authorizes only elected State Committee members from Kings County and properly selected vacancy-fillers to vote on the Executive Committee, and Election Law § 2-106 provides that State Committee members hold office only until the next election at which members of the committee are elected.

119. Petitioners are further likely to succeed on the merits because Proposal 10 and other rules amendments purportedly adopted at the August 25, 2026, meeting circumvented the

rules-amendment process established by Articles III, VI, and X of the KCDCC Bylaws and the notice and voting requirements of Election Law § 2-114.

120. Petitioners are further likely to succeed on the merits because the proposed amendments violate the Election Law's requirement that parties be democratically governed.

121. Persons who lost election or re-election or persons who did not seek re-election to the State Committee at the 2026 primary election are no longer State Committee members and lack the voting status required by Article V, § 1 of the KCDCC Bylaws.

122. Any vote at the August 25, 2026 meeting was unlawful and void to the extent it included, counted, or depended upon votes cast by persons who were, and are, no longer State Committee members and were not properly selected to fill qualifying State Committee vacancies.

123. Petitioners have suffered irreparable injury because the adoption or implementation of rule changes or other substantial matters by outgoing members or nonqualified voters immediately impaired Petitioners' rights and the rights of other newly elected members.

124. The harm is especially acute as Respondents' actions altered who may vote for the next Party Chair. Such a change not merely regulates procedure; rather, it materially altered the composition and voting rights of the body responsible for selecting the next Chairperson of the Executive Committee before the newly elected County Committee has had the opportunity to organize.

125. Petitioners have also suffered irreparable injury as Respondents are permitted to use Proposal 10 or any comparable rules amendment purportedly adopted on August 25, 2026 to govern the September organizational meeting. Such actions will deprive newly elected County Committee Members of the filing, review, notice, recommendation, and County Committee vote required by the Bylaws and allow an outgoing or improperly constituted Executive Committee to determine the rules under which the incoming County Committee organizes.

126. Proposal 10 imposes an 85% threshold for future rules amendments concerning proxies and their use by the County Committee or any standing or subcommittee. That supermajority requirement immediately and effectively prevents the ability of the newly elected County Committee to revisit, amend, or reverse proxy-related rules.

127. Proposal 10 is irreparable because it changes the rules for changing the rules. Once imposed, it would entrench the August 25, 2026, action by requiring an extraordinary 85% vote to undo proxy-related amendments or amendments related to Proposal 10.

128. The balance of equities favors Petitioners because Respondents will suffer no cognizable harm from preserving the status quo until the Organizing Meeting, while Petitioners and other newly elected members will suffer substantial harm if outgoing members or nonqualified voters are permitted to act on substantial matters before that meeting.

WHEREFORE, Petitioners respectfully request that this Court grant an Order to Show Cause and, upon the hearing thereof, enter a judgment and order:

A. Declaring that outgoing members of the KCDCC Executive Committee, including those who are no longer members of the County Committee, the State Committee, or both following the primary election, lack authority to exercise functions in substantial matters in the period between the primary election and the County Committee Organizing Meeting;

B. Declaring that, under Article V, § 1 of the KCDCC Bylaws and Election Law § 2-106, only elected State Committee members from Kings County and persons properly selected to fill Executive Committee vacancies resulting from State Committee vacancies may vote on the Executive Committee, and that persons who lost their State Committee elections and persons who did not seek re-election to their State Committee positions at the 2026 primary election are no longer State Committee members and lack Executive Committee voting rights;

C. Declaring that Respondents may not use an outgoing Executive Committee, on the eve of the County Committee Organizing Meeting, to rewrite the rules governing who may vote for the next Chairperson of the Executive Committee or otherwise alter the electorate before the newly elected County Committee has had the opportunity to organize and decide the rules governing its own leadership;

D. Declaring any rule change, bylaw amendment, amendment to party rules, change to governance structure, change to the electorate eligible to vote for Executive Committee Chair, officer action, committee action, or other action of substantial

consequence purportedly adopted at the August 25, 2026, meeting to be null, void, and of no force or effect;

E. Declaring any rule change, bylaw amendment, amendment to party rules, change to governance structure, change to the electorate eligible to vote for Executive Committee Chair, officer action, committee action, or other action which would substantially deny Brooklyn Democratic voters the right to democratically govern their party to be null, void, and of no force or effect;

F. Declaring that the August 25, 2026 meeting was a public meeting of the KCDCC Executive Committee because no majority vote was taken to enter executive session as required by Article V, Section 12 of the KCDCC Bylaws and Robert's Rules of Order Chapter IV 9:24, notwithstanding the inclusion of executive session on the notice of the meeting;

G. Declaring that the August 25, 2026 meeting violated Party Rules Sections 2(a) and 2(b) of the Democratic State Committee of New York by failing to be held as a public meeting open to all members of the Democratic Party of New York and by failing to publicize fully and in such manner as to assure timely notice to all interested persons the time and place of the meeting;

H. Enjoining and restraining Respondents from counting, recognizing, certifying, implementing, ratifying, or giving effect to any vote cast at the August 25, 2026 meeting by any person who lost election or re-election or failed to seek re-election to the State Committee at the 2026 primary election and therefore no longer held the State Committee membership on which Executive Committee voting rights depend;

I. Enjoining and restraining Respondents from implementing, ratifying, or giving effect to any resolution, rule change, bylaw amendment, amendment to party rules, change to governance structure, change to the electorate eligible to vote for Chairperson of the Executive Committee, officer action, committee action, or other action of substantial consequence adopted or purported to be adopted at the August 25, 2026 meeting or any adjournment thereof, pending the convening of the duly constituted KCDCC Organizing Meeting;

J. Enjoining and restraining Respondents from permitting any person to vote as a voting member of the KCDCC Executive Committee unless that person is a State

Committee member elected from Kings County or a person properly elected by the Executive Committee to fill a vacancy in Executive Committee membership resulting from a vacancy in the State Committee, as required by Article V, § 1 of the KCDCC Bylaws;

K. Enjoining and restraining Respondents from implementing, ratifying, or giving effect to any resolution, rule change, bylaw amendment, amendment to party rules, change to governance structure, change to the electorate eligible to vote for Chairperson of the Executive Committee, officer action, committee action, or other action which would substantially deny Brooklyn Democratic voters the right to democratically govern their party;

L. Enjoining and restraining Respondents from conducting any future meeting of the KCDCC Executive Committee in executive session without first obtaining a majority vote of the Executive Committee to enter executive session, as required by Article V, Section 12 of the KCDCC Bylaws and Robert's Rules of Order Chapter IV 9:24;

M. Enjoining and restraining Respondents from conducting or treating any public meeting of the KCDCC Executive Committee as other than a public meeting open to all members of the Democratic Party of New York, and from failing to publicize fully and in such manner as to assure timely notice to all interested persons the time and place for all such public meetings, as required by Party Rules Sections 2(a) and 2(b) of the Democratic State Committee of New York;

N. Granting such other further relief as this Court deems just and proper.

Dated: August 28, 2026
Brooklyn, New York

Certified pursuant to §130-1.1-a, the undersigned, an attorney admitted to practice in the State of New York certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed paper(s) are not frivolous.

/s/ Mark Hanna

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newellnyc@gmail.com
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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
JULIO PEÑA III, AKEL WILLIAMS,
JILLIAN CARA GOGER, and JOHNNY SAGAN
Petitioners,

-against-

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RODNEYSE BICHOTTE HERMELYN, in her capacity
as Chair of the Kings County Democratic County
Committee Executive Committee; KINGS COUNTY
DEMOCRATIC COUNTY COMMITTEE; and KINGS
COUNTY DEMOCRATIC COUNTY COMMITTEE
EXECUTIVE COMMITTEE; the NEW YORK STATE
DEMOCRATIC COMMITTEE; and ANTHONY BECKFORD,
MICHELLE TEGE, DOUG SCHNEIDER, LYDIA BELLA GREEN,
ARLENY ALVARADO-MCCALLA, HERIBERTO MATEO,
KENESHA TRAYNHAM-COOPER, HENRY BUTLER,
MICHAEL BOOMER, MERCEDES NARCISSE,
And ROXANNE PERSAUD in their capacities as
Former State Committee Members and Former Members of
the Kings County Democratic County Committee Executive
Committee
Respondents

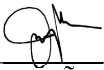
-----X
VERIFICATION

STATE OF NEW YORK}
COUNTY OF KINGS }

JULIO PEÑA III, affirms pursuant to CPLR §2106:

I am a Petitioner in the within action. I have read the Verified Petition and know the contents thereof. The contents of the Verified Petition are true to my own knowledge, except as to those matters therein stated to be alleged upon information and belief, and as to those matters I believe them to be true.

I affirm this 28th day of August, 2026, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.



JULIO PEÑA III

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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Respondents

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VERIFICATION

STATE OF NEW YORK}
COUNTY OF KINGS }

AKEL WILLIAMS, affirms pursuant to CPLR §2106:

I am a Petitioner in the within action. I have read the Verified Petition and know the contents thereof. The contents of the Verified Petition are true to my own knowledge, except as to those matters therein stated to be alleged upon information and belief, and as to those matters I believe them to be true.

I affirm this 28th day of August, 2026, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.



AKEL WILLIAMS

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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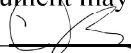
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VERIFICATION

STATE OF NEW YORK}
COUNTY OF KINGS }

JILLIAN CARA GOGER, affirms pursuant to CPLR §2106:

I am a Petitioner in the within action. I have read the Verified Petition and know the contents thereof. The contents of the Verified Petition are true to my own knowledge, except as to those matters therein stated to be alleged upon information and belief, and as to those matters I believe them to be true.

I affirm this 28th day of August, 2026, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.



JILLIAN CARA GOGER

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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JULIO PEÑA III, AKEL WILLIAMS,
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-against-

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Former State Committee Members and Former Members of
the Kings County Democratic County Committee Executive
Committee
Respondents

-----X
VERIFICATION

STATE OF NEW YORK}
COUNTY OF KINGS }

JOHNNY SAGAN, affirms pursuant to CPLR §2106:

I am a Petitioner in the within action. I have read the Verified Petition and know the contents thereof. The contents of the Verified Petition are true to my own knowledge, except as to those matters therein stated to be alleged upon information and belief, and as to those matters I believe them to be true.

I affirm this 28th day of August, 2026, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.



JOHNNY SAGAN

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Sent for signature to JULIO PENA III (julio@juliopenabk.com), JILLIAN CARA GOGER (jilliangoger@gmail.com), Akel Williams (akelwilliamsnyc@gmail.com) and Johnny Sagan (johnnysagan@gmail.com) by services@clio.com acting on behalf of mark@khstlaw.com
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08 / 28 / 2026

17:56:21 UTC

Viewed by Akel Williams (akelwilliamsnyc@gmail.com)
IP: 146.75.248.0



SIGNED

08 / 28 / 2026

17:56:40 UTC

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IP: 146.75.248.0



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08 / 28 / 2026

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08 / 28 / 2026
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IP: 174.216.210.103



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IP: 174.216.210.103



08 / 28 / 2026
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