

SUPREME COURT OF STATE OF NEW YORK
ALBANY COUNTY

*Denise Gaynon
for the Gov.
9/2/16
3:57pm*

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CENTER FOR JUDICIAL ACCOUNTABILITY, INC.
and ELENA RUTH SASSOWER, individually and
as Director of the Center for Judicial Accountability, Inc.,
acting on their own behalf and on behalf of the People
of the State of New York & the Public Interest.

Plaintiffs,

-against-

VERIFIED COMPLAINT
Index # *5122-16*

JURY TRIAL DEMANDED

ANDREW M. CUOMO, in his official capacity as Governor
of the State of New York, JOHN J. FLANAGAN in his official
capacity as Temporary Senate President, THE NEW YORK
STATE SENATE, CARL E. HEASTIE, in his official capacity
as Assembly Speaker, THE NEW YORK STATE ASSEMBLY,
ERIC T. SCHNEIDERMAN, in his official capacity as Attorney
General of the State of New York, THOMAS P. DINAPOLI,
in his official capacity as Comptroller of the State of New York,
and JANET M. DiFIORE, in her official capacity as Chief Judge of the
State of New York and chief judicial officer of the Unified Court System,

*Heather Davis
Deputy Clerk
9/2/2016*

Defendants.

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“It is the purpose of the legislature to recognize that each individual citizen and taxpayer of the state has an interest in the proper disposition of all state funds and properties. Whenever this interest is or may be threatened by an illegal or unconstitutional act of a state officer or employee, the need for relief is so urgent that any citizen-taxpayer should have and hereafter does have a right to seek the remedies provided for herein.”

State Finance Law Article 7-A, §123: “Legislative purpose”

complaint, respectfully set forth and allege:

or action pursuant to State Finance Law Article 7-A [§123 et
ments as to the unconstitutionality and unlawfulness of the
get Bill #S.6401/A.9001, both the original bill and the enacted
the expenditures of the enacted budget bill – embodying the

NEW YORK
STATE
SENATE



ROOM 333M
THE CAPITOL
ALBANY, NEW YORK 12247

SENATOR JOHN J. FLANAGAN
TEMPORARY PRESIDENT OF THE SENATE
MAJORITY LEADER

REBECCA WOOD
FIRST ASSISTANT COUNSEL
MAJORITY COUNSEL/PROGRAM

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EXB