

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ORANGE

ORAL CLARKE, ROMANCE REED, GRACE
PEREZ, PETER RAMON, ERNEST TIRADO,
and DOROTHY FLOURNOY,

Plaintiffs,

Index No.: EF002460-2024

v.

TOWN OF NEWBURGH and TOWN BOARD
OF THE TOWN OF NEWBURGH,

Defendants.

Gilbert Piaquadio, under penalty of perjury under the laws of New York, hereby affirms
as follows:

1. I am the Town Supervisor of the Town of Newburgh (the “Town”) and have served
in that position since 2013.

2. I make the following affirmation based on my personal knowledge and experience
as the Town Supervisor for the Town.

3. The Town was chartered in 1788, making it one of the oldest in towns in New York.

4. The Town is located within Orange County.

5. The Town has historically been a farming community, growing produce and
supplying butter and milk from its dairy farms.

6. Today, however, many of the Town’s residents work in surrounding metropolitan
areas and live in the Town because of its affordability and rural setting.

7. The Town’s current population is 31,987. Of this population, 61% are white, 15.4%
are black, 10.7% are mixed race, and 25.2% are Hispanic.

8. Over 90% of the Town's population over the age of 25 has a high school diploma.
9. 32.8% of the Town's residents hold a bachelor's degree or higher.
10. In March 2021, the Town adopted a comprehensive plan for police innovation designed to, among other things, promote inclusivity and provide the police force anti-discrimination and implicit bias training.
11. In 2022, the Town passed a resolution requiring the Town to "assist all persons who feel they have been discriminated against" on the basis of race, color, ancestry, national origin, and other grounds "to seek equity under federal and state laws by filing a complaint" with state and federal agencies.
12. Like most of New York's political subdivisions, the Town elects its Town Board members through at-large elections.
13. The Town has relied on its at-large system since at least 1865.
14. The Town Board consists of five seats and includes one supervisor and four councilmembers.
15. The Town Board's current members are Councilmen Paul Ruggiero, Scott Manley, and Anthony LoBiondo.
16. There is currently one vacancy on the Town Board, due to the recent death of a councilmember.
17. My term as Town Supervisor ends on December 31, 2025.
18. Councilman Ruggiero's term as Town Councilmember also ends on December 31, 2025.
19. Councilmen Manley's and LoBiondo's terms as Town Councilmembers end on December 31, 2027.

20. The Town will hold a special election in November of this year to fill the fourth, and currently vacant, Town Board seat.

21. Whomever is elected to the fourth and currently vacant Town Board seat will serve a one-year term that expires on December 31, 2025.

22. The Town has historically elected its Town office-holders in odd-numbered years, but newly enacted State law requires moving several of its elections to even-numbered years starting in 2026, including Town Board and Town Supervisor elections, including for the seats currently held by myself and Councilman Ruggiero.

23. I affirm this 25th day of September, 2024, 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.

Dated: New York, New York
September 25, 2024



Gilbert Piaquadio

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing Affirmation complies with the word count limitations set forth in Uniform Rule 202.8-b for the Supreme Court. This Affirmation uses Times New Roman 12-point typeface and contains 524 words, excluding parts of the document exempted by Rule 202.8-b. As permitted, the undersigned has relied on the word count feature of this word-processing program.

By: 

Bennet J. Moskowitz*Attorney for Defendants*