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February 28, 2020

**VIA HAND DELIVERY &  
OVERNIGHT MAIL**

Commissioner Erik J. Haight  
Commissioner Elizabeth Soto  
Dutchess County Board of Elections  
47 Cannon Street  
Poughkeepsie, New York 12601

Dear Commissioner Haight and Commissioner Soto:

This law firm represents the Andrew Goodman Foundation and Election@Bard, a student organization at Bard College in Allendale on Hudson, New York.

We write to request that a new designated polling location for the Town of Red Hook's Voting District 5 be set on the Bard College campus. Please confirm that a suitable on-campus location will be immediately designated. We can provide you with names of campus officials to establish a suitable campus location.

As you know, New York State law requires that all polling locations be designated by March 15, 2020. 2020 is a busy, critical election year (Presidential primary on April 28th, federal and statewide primaries on June 23rd and the general federal and state elections on November 3, 2020). Given this schedule, coupled with unprecedented youth engagement rates this crucial election cycle, it is imperative that a polling location be located on campus to: 1) allow pedestrian accessibility that is currently lacking (no sidewalks and poor street lighting near the current location for the voting district), 2) provide access to the designated location via a public transit route, and 3) ensure that voters are not disenfranchised and deprived of their state and federal rights to participate in the election process.

The students of Bard College and residents in the voting district have advocated for a change from the polling location designated for this voting district, which is currently St. John's Episcopal Church, located at 1114 River Road, Barrytown, New York 10257. We understand this has been the subject of much discussion over the years, and particularly applaud the efforts of the students. We encourage you to immediately select a polling location that complies in all respects with the requirements of the New York State Election Law and applicable federal law.

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On behalf of our clients we reserve the right to pursue all available legal remedies in state and/or federal court leading up to this important election cycle. Of course, we would prefer to avoid litigation, and welcome you input and cooperation toward that end.

Please date stamp the enclosed copy, and return it to me in the enclosed self-addressed stamped envelope. Thank you for your anticipated cooperation, and we look forward to your response.

Sincerely,



Michael J. Volpe

Yael Bromberg  
Chief Counsel for Voting Rights,  
The Andrew Goodman Foundation

cc: Honorable Marcus J. Molinaro, County Executive-Dutchess County  
Honorable Kevin A. Cahill, Assembly Member, Assembly District 103  
Honorable Sue Serino, State Senator, Senate District 41  
Honorable Kristofer Munn, County Legislator  
Honorable Robert McKeon, Supervisor, Town of Red Hook  
New York State Board of Elections, Co-Chairs Peter S. Kosinski and Douglas A. Kellner;  
Commissioner Andrew J. Spano

(All via Fedex)