

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ALBANY**

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LORI SMITH,

Plaintiff,

Index No.

v.

**COMPLAINT**

STATE OF NEW YORK and GEORGE DING, in his  
official capacity as Director of the New York State  
Education Department Office of Professional Disci-  
pline;

(Declaratory and Injunctive Relief)

Defendants.

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Plaintiff, Lori Smith, for her Complaint against Defendants and Request  
for Declaratory and Injunctive Relief, alleges the following:

**INTRODUCTION**

1. Lori Smith loves horses. She loves feeding and caring for horses.
2. Since being exposed to horses when she was young, she realized that she loved being around such majestic animals.
3. Like many horse lovers, she finds horses to be loving and calming to her soul.
4. As she grew up, Ms. Smith sought jobs that included work with horses.
5. She also dreamed of being a professional massage therapist for humans but raising children and other financial concerns kept her from pursuing that dream.
6. Later in life, Ms. Smith found an opportunity to combine these two passions.

7. Ms. Smith took a leap, enrolled in an equine sports massage therapy course, and became a Certified Equine Sports Massage Therapist.

8. New York's arbitrary, excessive, and unreasonable laws, however, stand in the way of Ms. Smith enjoying her New York and United States constitutional rights to pursue her passion and vocation – equine massage therapy.

9. Eager to get started with her new vocation, Ms. Smith set up a website to advertise her services as “Five Feather Equine Massage” that included a disclaimer that she is not a veterinarian and that as an Equine Sports Massage Therapist she would never diagnose or medically treat a horse.

10. Before she could get her business off the ground, New York State told her she needed to stop or risk facing civil or face criminal penalties.

11. According to the State, because Ms. Smith is neither a licensed veterinarian nor a licensed human massage therapist, she may not perform equine massage.

12. According to the State, only persons who are licensed veterinarians (or a narrow group of exempt persons) may practice veterinary medicine, broadly defined as “diagnosing, treating, operating, or prescribing for any animal disease, pain, injury, deformity or dental or physical condition.”

13. According to the State, the term “massage” or “massage therapy” can only be used by persons licensed or authorized under the law to practice human massage, defined as “engaging in applying a scientific system of activity to the muscular structure of the human body by means of stroking, kneading, tapping and vibrating with the hands or vibrators for the purpose of improving muscle tone and circulation.”

14. The State reads these two laws together to conclude that the only persons in New York who may massage animals are veterinarians or veterinary technicians under the supervision of a veterinarian.

15. A typical licensed veterinarian takes eight years of post-high school coursework, including four years at a veterinary school that does not offer equine massage instruction.

16. Not being a licensed veterinarian and faced with the threat of criminal charges, Ms. Smith did not take on any appointments and took down her website. To this day, she has not engaged further in her desired vocation.

17. At no point, however, has Ms. Smith claimed to be a New York-licensed veterinarian, as she knows that animal massage is not a replacement for veterinary care.

18. Animal massage is separate and distinct from veterinary medicine, like human massage is separate and distinct from the practice of medicine.

19. While horses, and other animals like cats and dogs, benefit from massage in a variety of ways, equine massage therapy does not involve the diagnosis and treatment of physical conditions or ailments that a veterinarian performs.

20. Rather, equine massage more generally aids a horse's natural body functions by helping increase endorphins, improve blood circulation, and relax muscles.

21. Equine massage therapy is not distinct from the routine and regular activities of grooms, trainers, farriers, and owners in caring for horses.

22. As it has applied the law to Ms. Smith, however, New York defines the routine care provided to livestock and pets as practicing veterinary medicine.

23. Individuals engaged in animal husbandry practices and pet ownership who provide routine care to their animals practice veterinary medicine illegally, according to the State.

24. New York's application of the law produces absurd, arbitrary, and inconsistent results, and the State unfairly singled out Ms. Smith for enforcement, depriving her of her rights as a New York and United States citizen.

25. Accordingly, Ms. Smith seeks a declaration from this Court that Education Law § 6701 does not encompass equine massage therapy, or, alternatively, that Education Law § 6701 violates the United States and New York constitutions.

#### **STATEMENT OF FACTS**

##### **The Practice of Animal Massage**

26. "Animal" massage is the practice of massage therapy on animals.

27. "Equine" massage is the practice of massage therapy on horses.

28. New York law does not define either "animal" massage or "equine" massage.

29. New York law only defines massage therapy in the context of "human" massage therapy. The definition of massage therapy in New York is "engaging in applying a scientific system of activity to the muscular structure of the human body by means of stroking, kneading, tapping and vibrating with the hands or vibrators for the purpose of improving muscle tone and circulation."

30. Massage, whether animal or human massage, is a non-invasive practice.

**Plaintiff Lori Smith**

31. Ms. Smith is a privately-certified equine sports massage therapist.

32. Ms. Smith obtained private certification in equine massage from Equine Kneads LLC in Warren County, New Jersey in July 2017.

33. Certification from Equine Kneads LLC includes both classroom time and interactive tasks. Among other things, students learn about horse anatomy, muscles and their functions, muscle origin and insertion, and horse skeletal systems. Students also massage horses of multiple body types.

34. As part of her coursework, Ms. Smith received instructions that equine massage therapists do not diagnose or treat horses and that owners should check with their veterinarians before engaging an equine massage therapist.

35. After obtaining her certification, Ms. Smith created a website and started her business, "Five Feathers Equine Massage," with the hope of developing it into her full-time vocation.

36. Ms. Smith made clear on her website that she is not a veterinarian and that she would never diagnose or medically treat a horse.

37. Last year, however, Ms. Smith received a telephone call from New York's Office of Professional Discipline within the State Education Department.

38. During this call, a senior investigator informed her that she may be violating the New York Education law by using the term "massage" in the

name “Five Feathers Equine Massage” and offering equine massage services that New York State defines as the practice of veterinary medicine.

39. The senior investigator then sent Ms. Smith a proposed compliance letter in which he asked Ms. Smith to declare that she would cease and desist from violating the Education Law.

40. Ms. Smith is not a New York-licensed veterinarian and has never held herself out as a New York-licensed veterinarian.

41. Ms. Smith has never advertised that she provided or would provide veterinarian services as either a New York-licensed veterinarian or as a veterinary technician.

42. Any person who practices veterinary medicine without a license in New York is guilty of a Class A misdemeanor or a Class E non-violent felony. Class A misdemeanors are punishable by up to maximum of one year in jail and up to a \$1,000.00 fine or twice amount of the individual’s gain from the crime. Class E non-violent felonies are punishable by up to a maximum of four years in jail.

43. Faced with potential criminal charges, Ms. Smith stopped any efforts to perform equine massage therapy and took down her website.

#### **New York’s Regulation of Veterinary Medicine**

44. New York defines the practice of “veterinary medicine” as “diagnosing, treating, operating, or prescribing for any animal disease, pain, injury, deformity or dental or physical condition.”

45. In New York, a person who practices the profession of “veterinary technology” is a person who is “employed ... under the supervision of a veterinarian to perform such duties as are required in carrying out medical orders

as prescribed by a licensed veterinarian requiring and understanding of veterinary science, but not requiring [veterinary licensure].”

46. The Education Law makes no mention of “massage” in its definition of veterinary medicine or veterinary technology.

47. New York requires a license, issued by the New York Board of Veterinary Medicine, to practice veterinary medicine.

48. To be licensed as a veterinarian in New York State a person must be of good moral character, be at least 21 years of age; and meet certain education, examination, and experience requirements.

49. The education, examination, and experience requirements for a new veterinary medicine license candidate include:

- Satisfactory completion of at least 60 semester hours of college study from a New York State registered program or the equivalent as determined by the New York State Education Department;
- Satisfactory completion of a professional program in veterinary medicine accredited by the American Veterinary Medical Association (AVMA) or approved by the New York State Education Department;
- The professional program must consist of four years of college study (or its equivalent), including an acceptable year of clinical training, and must lead to the degree of Doctor of Veterinary Medicine, or its equivalent; and
- Passing the North American Veterinary Licensing Examination administered by the National Board of Veterinary Medical Examiners.

50. A typical New York veterinarian must have received a doctoral degree in veterinary medicine from an accredited veterinary school, passed a written examination, and paid a \$900 fee.

51. To be a newly licensed veterinarian in New York and person must have the equivalent of eight years of post-secondary education, a year of clinical training, and pass a written examination.

52. Graduates of accredited veterinary schools obtain the professional Doctor of Veterinary Medicine degree.

53. The American Veterinary Medical Association (AVMA) is the principal accrediting body for veterinary schools in the United States.

54. New York requires its applicants for a veterinary license to have graduated from an AVMA-accredited school.

55. There are 22 veterinary schools in the United States with full accreditation status, meaning that they meet AVMA standards and their graduates are eligible to become veterinarians upon successful completion of their academic work.

56. There is only one AVMA-accredited veterinary school in the state - Cornell University's College of Veterinary Medicine in Ithaca, New York.

57. AVMA-accredited veterinary schools require that students be taught over a minimum period of four academic years.

58. The AVMA's accreditation standards do not require either mandatory or elective courses in animal massage therapy.

59. Coursework at Cornell's College of Veterinary Medicine does not require mandatory or elective coursework in animal massage therapy.



60. The AVMA's accreditation standards do not require graduates of AVMA-accredited veterinary schools to demonstrate knowledge of, or proficiency in, animal massage.

61. Upon information and belief, four years of tuition at an accredited veterinary school can cost well over \$200,000.00.

62. The current regulatory environment, as interpreted and enforced by New York's Board of Veterinary Medicine, limits entry into the animal massage occupation to those who can spend years of their lives and hundreds of thousands of dollars on classes and examinations that do not teach massage. Animal massage therapists like Ms. Smith are thus forced to take classes in material they do not wish to learn in order to employ a skill they already know, at great and ultimately unnecessary cost.

#### **New York's Regulation of Massage Therapists**

63. To be a licensed massage therapist in New York, a person must be of good moral character, be at least 18 years of age, be a United States citizen or lawfully admitted permanent resident, and meet the education and examination requirements

64. The education and examination requirements to be a licensed massage therapist include:

- Complete a high school education;
- Graduate from a school or institute of massage therapy with a program registered by the New York State Education Department as licensure qualifying;
- Graduate from a substantial equivalent, in both subject matter or extent of training;

- Graduate with 1000 hours of classroom instruction, including a minimum of 150 working on a person;
- Complete coursework in anatomy, physiology, neurology, myology or kinesiology, pathology, hygiene, first aid, CPR, infection control procedures, the chemical ingredients of products that are used and their effects, as well as the theory, technique and practice of both oriental and western massage/bodywork therapy; and
- Pass the New York State Massage Therapy Examination.

65. Programs offered in New York can range from six months to two years for a massage therapy candidate to meet the education requirements.

66. Only a New York-licensed “massage therapist” can claim to be engaged in the practice of massage or massage therapy in any manner, which New York law limits to “human” massage.

67. Anyone who is not a New York-licensed massage therapist who uses the term “massage” for the purposes or claiming to be engaged in the practice of massage or massage therapy is guilty of a Class A misdemeanor. In New York, a Class A misdemeanor carries a punishment of up to one year in jail or three years’ probation and a fine up to \$1,000.00 or double the amount of the individual’s gain from the “crime.”

#### **INJURIES TO MS. SMITH**

68. As interpreted and enforced by the State, New York’s veterinary licensing scheme prohibits Ms. Smith from providing animal massage services without a veterinary license.

69. If Ms. Smith were to provide animal massage services, each day she did so she would be under threat of civil and criminal penalties.

70. If Ms. Smith were to include the term “massage” in her business name, she would be guilty of a Class A misdemeanor.

71. Ms. Smith desires to pursue an honest living in her chosen field of equine massage by offering massage services to animals whose owners are willing to pay for her services.

72. Ms. Smith is capable in animal massage and has devoted substantial time and effort to developing her skills.

73. Ms. Smith has no desire to attend veterinary school or to become a New York-licensed veterinarian.

74. Moreover, it is not feasible for Ms. Smith to become a licensed veterinarian. To do so, Ms. Smith would have to stop working for a minimum of four years in order to attend veterinary school, pay thousands upon thousands of dollars, and pass the necessary examinations, which would cause her to lose substantial income.

75. Nor would it be economically feasible for a licensed veterinarian to engage in a time-intensive equine massage therapy practice, assuming that veterinarian had the appropriate training in animal massage.

76. The AVMA sets forth minimum curriculum requirements for accredited veterinary school that do not include animal massage therapy.

77. Ms. Smith has no desire to become a New York-licensed massage therapist. To do so, Ms. Smith would need to complete, among other things, 1000 hours of coursework instruction on human, not equine, massage, pay thousands upon thousands of dollars, and pass the necessary examination, for a license that would not allow her to provide equine massage.

78. No New York license rationally relates to the work done by equine massage therapists.

79. Regardless, the State threatened Ms. Smith with criminal and civil penalties.

80. Because of the State's threats, Ms. Smith disabled her website.

81. Because of the State's threats, Ms. Smith ceased other forms of advertising her services.

82. But for the State's position that animal massage constitutes the practice of veterinary medicine, Ms. Smith would advertise her services.

83. But for the State's position that animal massage constitutes the practice of veterinary medicine, Ms. Smith would be working as an equine massage therapist.

84. The State's actions threaten Ms. Smith's ability to financially support herself.

85. Applying New York's veterinary and massage licensing laws, rules, and regulations to animal massage therapists in the manner done by the State arbitrarily restricts entry into a safe occupation and thereby restricts or otherwise denies competition and harms Ms. Smith directly.

#### **JURISDICTION AND VENUE**

86. Ms. Smith brings this civil rights lawsuit pursuant to Article I, Sections 6 and 11 of the New York Constitution; the Fourteenth Amendment to the United States Constitution, the Civil Rights Act of 1871, 42 U.S.C. § 1983, NY CPLR § 3001, and the authority of this court to provide injunctive relief pursuant to NY CPLR § 6301.

87. This court has jurisdiction over this action pursuant to Article VI, Section 7 of the New York State Constitution, NY CPLR 301, and 42 U.S.C. § 1983.

88. Venue is proper in this Court under CPLR 503.

#### **PARTIES AND VENUE**

89. Plaintiff Lori Smith is a United States citizen. She resides in Norfolk, St. Lawrence County, New York.

90. Defendants are the State of New York and George Ding, solely in his official capacity as the Director of the New York State Education Department Office of Professional Discipline.

#### **COUNT I**

##### **(NY CPLR § 3001— REQUEST FOR DECLARATORY JUDGMENT)**

91. Plaintiff incorporates and re-alleges the allegations in this complaint as through set forth in this section.

92. Under NY CPLR § 3001, this court may render a declaratory judgment having the effect of a final judgment as to the rights and other legal relations of the parties to a justiciable controversy whether or not further relief is or could be claimed.

93. Plaintiff has not violated the law because she has not, and never intended to, “diagnose” or “treat” horses within the meaning of Education Law § 6701.

94. Equine massage therapy is not used to correct an illness, disease, ailment, or condition in any manner that could be confused with licensed veterinary care.

95. Equine massage therapy fits within a range of activities that comprise responsible equine health care and maintenance, like those activities undertaken by grooms, trainers, farriers, and owners for horses. And it is akin to the responsible health care provided by farmers to their livestock and owners to their pets.

96. No one would, or should, confuse Plaintiff or any other equine massage therapist with a licensed veterinarian trained to diagnose diseases and conditions and to treat animals medically or surgically.

97. By performing equine massage, Plaintiff would not render diagnosis or medical or surgical treatment services requiring a veterinary license and, therefore, her equine massage business falls outside the intended scope and purpose of Education Law § 6701.

## COUNT II

### (NEW YORK CONSTITUTION ARTICLE I, SECTION 6 — DUE PROCESS)

98. Plaintiff incorporates and re-alleges the allegations in this complaint as though set forth in this section.

99. Article 1, Section 6 of the New York Constitution Provides, “No Person shall be deprived of life, liberty or property without due process of law.” Among the civil liberties secured by this provision is the right to earn an honest living in the occupation of one’s choice free from unreasonable government regulation.

100. The laws and regulations governing veterinary medicine far exceed any legitimate and rational public health and safety concerns about animal massage.

101. Requiring animal massage therapists to attend veterinary schools and to enroll in classes that have nothing to do with animal massage in order to obtain a veterinary license, while simultaneously failing to require any instruction or training in the practice of animal massage, is not rationally related to any public health or safety concerns in any way.

102. New York's veterinary laws, rules, and regulations, as applied to Plaintiff by Defendants, their agents, and employees, acting under color of state law, unreasonably and arbitrarily restrict Plaintiff's ability to pursue her chosen occupation. This, Defendants have violated the due process guarantee of the New York Constitution by applying New York's veterinary scheme to Plaintiff and other equine massage therapists.

103. Plaintiff has no other legal, administrative, or other remedy by which to prevent or minimize the continuing irreparable harm to her constitutional rights. Unless Defendants are enjoined from committing the above-described constitutional violations of the New York Constitution, Plaintiff and other animal massage therapists will continue to suffer severe and irreparable harm.

**COUNT III**  
**(NEW YORK CONSTITUTION ARTICLE I, SECTION 11 -**  
**EQUAL PROTECTION)**

104. Plaintiff incorporates and re-alleges the allegations in this complaint as though set forth in this section.

105. Article 1, Section 11 of the New York Constitution provides, "No Person shall be denied the equal protection of the laws of this state or any subdivision thereof." Among the civil liberties secured by this provision is the right

to earn an honest living in the occupation of one's choice free from unreasonable government regulation.

106. The laws and regulations governing veterinary medicine far exceed any legitimate and rational public health and safety concerns regarding animal massage.

107. Requiring animal massage therapists to attend veterinary schools and to enroll in classes that have nothing to do with animal massage in order to obtain a veterinary license, while simultaneously failing to require any instruction of training in the practice of animal massage, is not rationally related to any public health or safety concerns in any way.

108. New York's veterinary laws, rules, and regulations, as applied to Plaintiff by Defendants, their agents, and employees, acting under color of state law, unreasonably and arbitrarily restrict Plaintiff's ability to pursue her chosen occupation. Therefore, Defendants have violated the equal protection guarantee of the New York Constitution by applying New York's veterinary scheme to Plaintiff and other massage therapists.

109. Plaintiff has no other legal, administrative, or other remedy by which to prevent or minimize the continuing irreparable harm to her constitutional rights. Unless Defendants are enjoined from committing the above-described constitutional violations of the New York Constitution, Plaintiff and other animal massage therapists will continue to suffer severe and irreparable harm.



**COUNT IV  
(U.S. CONSTITUTION FOURTEENTH AMENDMENT — DUE PROCESS)**

110. Plaintiff incorporates and re-alleges the allegations in this complaint as though set forth in this section.

111. The Due Process Clause of the Fourteenth Amendment to the United States Constitution provides that no state shall “deprive any person of live, liberty, or property, without due process of law.”

112. By requiring animal massage therapists to obtain veterinary licenses, Defendants, their agents and employees, acting under color of state law, violate Plaintiff’s right to due process of law as guaranteed by the Fourteenth Amendment to the United States Constitution and 42 U.S.C. §1983.

113. By requiring animal massage therapists to attend veterinary school and to enroll in irrelevant classes in order to obtain a veterinary license, while failing to require any instruction or training in the practice of equine massage, New York’s veterinary license scheme, as applied to Plaintiff and other animal massage therapists, is unconstitutionally overbroad.

114. Requiring Plaintiff to obtain a veterinary license at a significant financial cost that takes years to complete, only a fraction of which is arguably in any way related to the practice of animal massage, does not rationally advance any legitimate public health and safety concerns regarding animal massage.

115. New York’s veterinary laws and regulations as applied to Plaintiff by Defendants, their agents or employees, acting under color of state law, unreasonably and arbitrarily restrict Plaintiff’s ability to pursue her chosen occupation. Thus, Defendants have violated the due process guarantee of the

United States Constitution by applying New York's veterinary scheme to Plaintiff and other animal massage therapists.

116. Plaintiff has no other legal, administrative, or other remedy by which to prevent or minimize the continuing irreparable harm to her constitutional rights. Unless Defendants are enjoined from committing the above-described constitutional violations of the Fourteenth Amendment to the United States Constitution, Plaintiff and other animal massage therapists will continue to suffer severe and irreparable harm.

**COUNT V  
(U. S. CONSTITUTION FOURTEENTH AMENDMENT -  
EQUAL PROTECTION)**

117. Plaintiff incorporates and re-alleges the allegations in this complaint as though set forth in this section.

118. The Equal Protection Clause of the Fourteenth Amendment to the United States Constitution provides that no state shall "deny to any person within its jurisdiction the equal protection of the laws."

119. Requiring animal massage therapists to obtain veterinary licenses, while not requiring instruction in animal massage therapy is not rationally related to public health or safety.

120. By treating animal massage therapy as though it were veterinary medicine and requiring animal massage therapists to obtain veterinary licenses, Defendant, their agents and employees, acting under color of state law, violate Plaintiff's right to equal protection of the laws as guaranteed by the Fourteenth Amendment to the United States Constitution and 42 U.S.C. § 1983.

121. Plaintiff has no other legal, administrative, or other remedy by which to prevent or minimize the continuing irreparable harm to her constitutional rights. Unless Defendants are enjoined from committing the above-described constitutional violations of the Fourteenth Amendment to the United States Constitution, Plaintiff and other animal massage therapists will continue to suffer severe and irreparable harm.

**COUNT VI  
(U.S. CONSTITUTION FOURTEENTH AMENDMENT -  
PRIVILEGES OR IMMUNITIES)**

122. Plaintiff incorporates and re-alleges the allegations in this complaint as though set forth in this section.

123. The Privileges or Immunities Clause of the Fourteenth Amendment to the United States Constitution provides that “[n]o State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States.” This clause protects the right to earn a living in the occupation of a person’s choice subject only to reasonable government regulation.

124. Applying New York’s veterinary licensing scheme to animal massage therapists arbitrarily and unreasonably impairs Plaintiff’s ability to pursue her chosen livelihood by forcing her to obtain a license, at substantial cost, that is unrelated to her occupation and subjects her to fines, penalties, and potential criminal liability, thus threatening the existence, profitability, and potential growth of her business in violation of the privileges or immunities guarantee of the Fourteenth Amendment to the United States Constitution and 42 U.S.C. § 1983.

125. Plaintiff has no other adequate legal, administrative, or other remedy by which to prevent or minimize the continuing irreparable harm to her

constitutional rights. Unless Defendants are enjoined from committing the above-described constitutional violations of the Fourteenth Amendment to the United States Constitution, Plaintiff and other animal massage therapists will continue to suffer great and irreparable harm.

#### REQUEST FOR RELIEF

To further the interests of equity and justice, Plaintiff requests that this Court award the following relief:

- A. Enter a judgment declaring that the application of NYS Education Law Article 135, *et seq.* to persons, including Plaintiff, desiring to massage animals for a fee is unconstitutional because it is in violation of Art. I § 6 of the New York Constitution;
- B. Enter a judgment declaring that the application of NYS Education Law Article 135, *et seq.* to persons, including Plaintiff, desiring to massage animals for a fee is unconstitutional because it is in violation of Art. I § 11 of the New York Constitution;
- C. Enter a judgment declaring that the application of New York State Education Law Article 135, *et seq.* to persons, including Plaintiff, desiring to massage animals for a fee is unconstitutional because it is in violation of the Due Process Clause of the Fourteenth Amendment of the United States Constitution;
- D. Enter a judgment declaring that the application of NYS Education Law Article 135, *et seq.* to persons, including Plaintiff, desiring to massage animals for a fee is unconstitutional because it is in violation of the Equal Protection Clause of the Fourteenth Amendment of the United States Constitution;

- E. Enter a judgment declaring that the application of NYS Education Law Article 135, *et seq.* to persons, including Plaintiff, desiring to massage animals for a fee is unconstitutional because it is in violation of the Privileges or Immunities Clause of the Fourteenth Amendment of the United States Constitution;
- F. Permanently enjoin Defendant and their Agents or employees from enforcing New York State Education Law Article 135 *et. seq.* against animal massage therapists including Plaintiff;
- G. Permanently enjoin Defendant and their Agents or employees from enforcing New York State Education Law Article 130, Sub-Article 4, *et. seq.* against animal massage therapists including Plaintiff;
- H. Permanently enjoin Defendant and their Agents or employees from enforcing New York State Education Law Article 155 § 7802 *et. seq.* against animal massage therapists including Plaintiff;
- I. Award nominal damages in the amount of \$1.00;
- J. Award attorneys' fees and costs in this action pursuant to CPLR § 8601(a), 42 U.S.C. § 1988, and the private attorney general doctrine; and

K. Such other relief as the Court deems just, equitable, or proper.

Dated: Albany, New York  
June 25, 2019

Respectfully submitted,



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Cameron J. Macdonald  
Government Justice Center  
P.O. Box 7113  
Albany, New York 12224  
(518) 434-3125  
cam@govjustice.org

*Counsel for Plaintiff*