

STATE OF NEW YORK  
SUPREME COURT, COUNTY OF RENSSELAER

In the Matter of the Application of

Index No.: \_\_\_\_\_

**PEOPLE OF THE STATE OF NEW YORK**, by  
**LETITIA JAMES**, *Attorney General of the State of  
New York*,

Petitioner,

For an Order Pursuant to N.Y. C.P.L.R. 7086 and 6301

– against –

**JASON SCHOFIELD**, *individually and in his capacity  
of Commissioner of the Rensselaer County Board of  
Elections*, **EDWARD MCDONOUGH**, *individually  
and in his capacity of Commissioner of the Rensselaer  
County Board of Elections*, and **RENSSELAER  
COUNTY BOARD OF ELECTIONS**,

Respondents.

**AFFIDAVIT OF SHARON FERGUSON**

Sharon Ferguson, being duly sworn, deposes and says:

1. I am an African-American woman. I live in Corliss Park, a Public Housing Project. Corliss Park is located in Lansingburgh, a northern neighborhood in Troy. I have lived in Corliss Park for 17 years.
2. I live with my son, who is 23 years old.
3. I do not own or have access to a car, nor does my son. We rely on public transportation, and occasionally rides from others, to get around Troy.
4. Before I retired in October 2019, I was a licensed nurse, and worked as a school bus monitor.

***My History as a Voter***

5. I have been a registered voter for over 50 years, since I was 18. My son is also a registered voter.

6. With the exception of an election last year, I have voted in every election for the past 17 years.

***2020 Primary Election***

7. During the 2020 primary election, I went to my Election Day polling place, which is a community center/office building on the Corliss Park premises. My understanding was that my Election Day polling place would be open until 9 P.M.

8. When I arrived at my polling place around 4 or 5 P.M., the door was locked, and I did not know why. I flagged down a police officer and asked if he knew anyone he could call for assistance. The officer called Troy Housing Authority, which I believe told him that the site was not a polling place that year.

9. I do not recall receiving a letter or notice in the mail saying my Election Day polling place had been moved.

10. Given the confusion, I ended up not voting in that election. This was the first time in 17 years that I did not vote.

***2020 General Election***

11. Last year, on a Saturday around the time of the Trump/Biden election, I rode alongside other friends to Bethel Baptist Church, which I attend.

12. As we were pulling up, two members of my Church were getting out of a bus at Bethel Baptist, and told me about early voting, which they had just come from. They told me I

could get on the bus and be driven to another Church, where I could cast my vote before Election Day.

13. It seemed like a convenient arrangement, so I got on the bus and took the ride. When the bus arrived, the Church was very crowded; there was a long line and probably around 50 to 60 people outside.

14. I am an elderly woman and cannot stand or walk for too long. Also, I could not wait too long, as I had to get back to Bethel Baptist Church. So, I left the site without voting.

15. I was not able to vote early during that election. Instead, I went to my polling place to vote on Election Day, and was able to vote there.

#### ***2021 Primary and General Elections***

16. I plan on voting in both the 2021 primary and general elections.

17. Although I would appreciate the convenience and flexibility of voting early, I do not have access to a car.

18. To travel from Corliss Park to vote at my nearest early voting polling place, it would take me two buses and over an hour, each way, to do so.

19. I have not heard about another opportunity to receive free transportation to an early voting polling place.

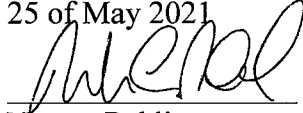
20. I therefore do not plan on voting early for either the 2021 primary or general elections.

21. If Unity House or Bethel Baptist Church were made to be early voting sites, I would vote at either site, because they are both much closer to my neighborhood, and right off the bus line. It would take me about 30 minutes to get to either site.



**SHARON FERGUSON**

Sworn to me before this  
25 of May 2021



Notary Public

**MARK E. RUDD**  
Notary Public, State of New York  
Qualified in Rensselaer County  
Commission Expires June 08, 2023