

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NASSAU

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

*Plaintiff,*

-against-

*COUNTY OF NASSAU and BRUCE A. BLAKEMAN, in*  
*his official capacity as NASSAU COUNTY*  
*EXECUTIVE,*

*Defendants.*

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

**SUMMONS**

To The Above-Named Defendants:

You are hereby summoned to answer the attached complaint in this action and to serve a copy of your answer or notice of appearance on attorneys for Plaintiff. If this summons and complaint were personally served upon you in the State of New York, you must serve your answer within twenty (20) days of service, exclusive of the day of service. You are hereby notified that in case of your failure to appear or answer this summons and complaint, judgment will taken against you by default for the relief demanded in the complaint.

Plaintiff designates Nassau County as the venue for this action, pursuant to New York Civil Practice Law and Rules §§ 503(a), because Defendants reside in and a substantial part of the events giving rise to this action occurred in Nassau County, and 504(1), because this is an action against the County of Nassau and one of its officers.

**Dated:** July 15, 2024  
New York, NY

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Respectfully submitted,

LETITIA JAMES  
Attorney General of the State of New York

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SUPREME COURT OF THE STATE OF NEW YORK  
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**COMPLAINT**

The People of the State of New York, by Letitia James, Attorney General of the State of New York (“State”), respectfully allege as follows:

**NATURE OF THE ACTION**

1. On June 24, 2024, Defendant County of Nassau’s (“Nassau County”) legislature enacted Local Law 121-24, titled, “Fairness for Women and Girls in Sports.” Defendant Nassau County Executive Bruce A. Blakeman (“Blakeman”) signed Local Law 121-24 into law on July 15, 2024, with immediate effect. Local Law 121-24 is annexed hereto as **Exhibit A**. Local Law 121-24 is in fact not an act of fairness. It is an act of discrimination that singles out transgender women and girls for discriminatory treatment, entrenching into law regressive and invasive gender stereotypes that negatively impact all women and girls subject to its requirements. What is more, Local Law 121-24 expressly contravenes New York State law. But this is not news to Defendants.

2. Local Law 121-24 is part of the Defendants’ renewed effort to discriminate, violate New York State civil rights and anti-discrimination laws, and deprive transgender women and girls of the rights and protections afforded thereunder, that initially began with passage of Executive Order 2-2024. Local Law 121-24’s purpose, text, terms, and requirements mirror Executive Order

2-2024, which was signed into law on February 22, 2024 by Defendant Blakeman. Executive Order 2-2024 is annexed hereto as **Exhibit B**. Following the enactment of Executive Order 2-2024, the State sent Defendants a cease-and-desist letter on March 1, 2024, notifying and explaining to Defendants that Executive Order 2-2024 violated several provisions of New York state law and demanding its immediate rescission. A copy of the State’s March 1, 2024 cease-and-desist letter is annexed hereto as **Exhibit C**.

3. Executive Order 2-2024 was permanently enjoined by the Nassau Supreme Court on May 14, 2024. *See Long Island Roller Rebels v. Blakeman*, Index No. 604254/2024, NYSCEF Doc. No. 44 (Sup. Ct. Nassau County 2024). The Court held that Defendant Blakeman exceeded his authority in issuing Executive Order 2-2024 because Defendant Blakeman did not have a corresponding local law enacted by the Nassau County legislature. The Nassau County legislature then repackaged Executive Order 2-2024, nearly word-for-word, and adopted Local Law 121-24.

4. Like its now defunct predecessor, Local Law 121-24 requires the categorical exclusion of all transgender women and girls, without limitation, from participating in any women’s and girls’ “sports, leagues, organizations, teams, programs, or sporting entities” at “sporting events or competitions” held at any Nassau County public facility. Local Law 121-24 also restricts consideration of participants’ gender exclusively to the sex assigned to them at or near the time of their birth, regardless of gender identity, gender marker amendments, or court orders recognizing a participants’ gender identity obtained pursuant to New York State law.

5. Local Law 121-24 violates Article IX of New York State Constitution (“Article IX”) and the New York Municipal Home Rule Law (“MHRL”), both of which prohibit local governments from enacting laws that are inconsistent with general state laws. N.Y. Const. Art. IX § 2(c); N.Y. Mun. Home Rule Law § 10(1)(ii). Local Law 121-24 expressly contravenes the New

York State Human Rights Law (“HRL”) and New York Civil Rights Law (“CRL”), which apply statewide and prohibit and protect transgender people from discrimination because of their sex, gender identity, and/or gender expression.

6. As the Nassau Supreme Court noted in its May 14, 2024 Order, “[i]t is axiomatic that the chief executive of a local government cannot unlawfully infringe upon the legislative powers reserved for the legislature.” The same reasoning applies to Defendants and Local Law 121-24. The Nassau County Legislature cannot unlawfully infringe upon the New York State Legislature’s legislative powers and enactments, which expressly prohibit the very form of discrimination that Local Law 121-24 requires.

7. Accordingly, the State seeks a declaratory judgment declaring that Local Law 121-24 is invalid and conflict preempted because it violates Article IX’s and the MHRL’s inconsistency prohibitions due to its direct conflicts with the HRL and CRL. The State also seeks an injunction permanently enjoining Defendants from enforcing or implementing Local Law 121-24 in any respect.

### JURISDICTION AND VENUE

8. This action challenges the validity of Local Law 121-24 under Article IX, the MHRL, and the doctrine of conflict preemption, based on Local Law 121-24’s impermissible inconsistencies with provisions of the HRL and CRL, and the rights these provisions of New York State law confer to the People of the State of New York.

9. This Court has jurisdiction over this action pursuant to Judiciary Law § 140-b and Civil Practice Law and Rules (“CPLR”) Article 63 and § 3001.

10. Venue is proper in Nassau County pursuant to CPLR §§ 503(a), because Defendants reside in and a substantial part of the events giving rise to this action occurred in Nassau County, and 504(1), because this is an action against the County of Nassau and one of its officers.

### PARTIES

11. Plaintiff, the People of the State of New York, represented by and through their Attorney General, Letitia James, comprise a sovereign state of the United States. The Attorney General is the State of New York's chief law enforcement officer and is authorized to pursue this action pursuant to Executive Law § 63(1) and the doctrine of *parens patriae*.

12. The State has a strong interest in eradicating discrimination and ensuring that its laws prohibiting such discrimination are enforced and not undermined by the policies or acts of its political subdivisions.

13. The State, bringing this action through the Office of the Attorney General, possesses a “unique status as the representative of the greater public good and [a] concomitant mandate to secure wide-ranging relief that will inure to the direct and indirect benefit of the broader community.” *New York v. Utica City Sch. Dist.*, 177 F. Supp. 3d 739, 753–54 (N.D.N.Y. 2016). The State seeks comprehensive prospective relief to enjoin Defendants' unlawful local law and prevent further discrimination by Defendants against individuals based on their sex, gender identity, and/or gender expression.

14. Defendant Nassau County is a political subdivision of the State, the county where Local Law 121-24 is in effect, the owner and proprietor of the public facilities covered by the Local Law, and the employer of the persons charged with implementation and enforcement of Local Law 121-24.

15. Defendant Blakeman, sued in his official capacity, is the County Executive of Nassau County, signed Local Law 121-24 into law on July 15, 2024, and is empowered to implement and enforce the law.

## FACTUAL ALLEGATIONS

### I. New York State Laws Prohibit Discrimination Because of Sex, Gender Identity, and Gender Expression

16. Since their enactment, the HRL and the CRL have prohibited the myriad forms of discrimination because of sex. New York courts have recognized that the HRL's and CRL's sex discrimination prohibitions and protections apply to people who experience discrimination because they are transgender.

17. The term "transgender" is an umbrella term used to describe the full range of people whose gender identity and/or gender expression do not conform to what is typically associated with the sex assigned to them at birth. A transgender woman or girl is a woman or girl who has a female gender and gender identity but was assigned male at birth. A transgender man or boy is a man or boy who has a male gender and gender identity but who was assigned female at birth.

18. On January 25, 2019, the New York State Legislature ("Legislature") amended several state laws, including the HRL and the CRL, through enactment of the Gender Expression Non-Discrimination Act ("GENDA"). GENDA codified and expressly included "gender identity or expression" as a protected class under CRL § 40-c and the HRL's anti-discrimination protections, including those applicable to public accommodations. The Legislature noted that GENDA codified the principle that New York State laws prohibiting sex discrimination already protected individuals from discrimination based on gender stereotypes or because an individual's gender identity or expression does not align with the sex they were assigned at birth.

19. GENDA defined gender identity or expression as “a person’s actual or perceived gender-related identity, appearance, behavior, expression, or other gender-related characteristic regardless of the sex assigned to that person at birth, including, but not limited to, the status of being transgender.” N.Y. Exec. Law § 292(35).

20. In enacting GENDA, the Legislature reaffirmed “that the [S]tate has the responsibility to act to assure that every individual within this state is afforded an equal opportunity to enjoy a full and productive life, and that the failure to provide such an equal opportunity, whether because of discrimination, prejudice, intolerance or inadequate education, training, housing or healthcare not only threatens the rights and proper privileges of its inhabitants, but menaces the institutions and foundation of a free democratic state and threatens the peace, order, health, safety, and general welfare of the state and its inhabitants.” S.B. 1047, 242nd Leg., Reg. Sess. (N.Y. 2019).

21. The Legislature found that “many residents of this state have encountered prejudice on account of their gender identity or expression,” and that “this prejudice has fostered a general climate of hostility and distrust, leading in some instances to physical violence against those perceived to live in a gender identity or expression which is different from that traditionally associated with the sex assigned to that person at birth.” *Id.*

22. As a result of GENDA, the HRL prohibits discrimination because of sex, gender identity, or gender expression in places of public accommodation, resort, or amusement. N.Y. Exec. Law §§ 291(2); 296(2)(a).

23. Under the HRL, places of public accommodation, resort, or amusement that must refrain from discrimination include a wide range of places, including those owned by local government entities, such as parks, swimming pools, golf courses, gymnasiums, and other public areas. N.Y. Exec. Law § 292(9).



24. The HRL also declares it an unlawful discriminatory practice for anyone “to aid, abet, incite, compel or coerce” acts prohibited as discrimination under the HRL. N.Y. Exec. Law § 292(6).

25. CRL § 40-c confers upon “all persons within the jurisdiction of this State” an entitlement to “equal protection of the laws of this State or any subdivision thereof.” N.Y. Civ. Rts. Law § 40-c(1). Further, it prohibits political subdivisions of the State, such as counties, from subjecting people to discrimination because of their sex, gender identity, or gender expression. N.Y. Civ. Rts. § 40-c(2).

26. The CRL also codifies the civil right of transgender people in New York to be treated consistent with their gender identity within New York State and under New York State law, as well as to access State-issued identity documents, including New York State birth certificates, and court orders recognizing their gender identity. N.Y. Civ. Rts. Law §§ 67(1); 67(2). These provisions guarantee that people may have their gender identity recognized and respected, regardless of the sex assigned to them as denoted on the birth certificate issued at the time of their birth.

27. The HRL and CRL represent two of the strongest civil rights and anti-discrimination laws in the nation. They reflect the Legislature’s prerogative to provide full and comprehensive statewide anti-discrimination protections to transgender people.

28. Collectively, these provisions of the HRL and CRL unequivocally confer upon transgender women and girls throughout the State of New York, including those in Nassau County, the rights to access public facilities free from discrimination because of their sex, gender identity, and/or gender expression and to enjoy equal protection under the law regardless of their sex, gender identity, and/or gender expression.

## II. Local Law 121-24 “Fairness for Women and Girls in Sports”

29. Despite these clear commands of New York State law, on June 24, 2024, Defendant Nassau County’s legislature took the extraordinary step of enacting Local Law 121-24, which directly contravenes the HRL, CRL, and, as described above, the rights and protections they afford transgender women and girls in Nassau County and throughout the State of New York.

30. In testimony supporting Local Law 121-24 before the June 24, 2024 Nassau County Full Legislative Meeting, Deputy Nassau County Attorney Victoria LaGreca acknowledged that Local Law 121-24 conflicts with New York State’s civil rights laws.

31. On July 15, 2024, Defendant Blakeman signed Local Law 121-24 into effect.

32. Local Law 121-24 applies to public facilities under the purview of the Nassau County Department of Parks, Recreation, and Museums (“Department of Parks”) and applies to any sporting event without limitation.

33. Local Law 121-24 creates three requirements that effectively prohibit transgender women and girls, as well as women’s and girls’ teams that include or welcome them, from participating in women and girls’ sporting events at Nassau County public facilities.

34. First, Local Law 121-24 requires a league, team, or other sports entity seeking use of these facilities to “expressly designate” itself as “male,” “female,” or “coed,” “based on [participants’] biological sex at birth.”

35. Second, Local Law 121-24 prohibits the Department of Parks from issuing any permit for a sporting event or competition to a sports entity designated for women or girls that

allows “biological males” to participate, but it allows the agency to issue a permit where a sports entity for men or boys includes participation by “biological females.”<sup>1</sup>

36. Third, Local Law 121-24 defines a participant’s gender as “the individual’s biological sex at birth,” as listed on their “official” birth certificate and only such birth certificates that were “filed at or near the time” of the participant’s birth.

37. Further, in defining a participant’s gender as exclusively the sex assigned to them at or near their time of birth, Local Law 121-24 does not contemplate the existence of individuals who are outside of the gender binary. Local Law 121-24’s terms effectively deny many intersex people and virtually all non-binary people, who may have been assigned male at birth but who may not possess a male gender and gender identity, any inclusive way to participate in women’s and girls’ sports events or competitions.

38. Local Law 121-24 targets women’s and girls’ teams for differential treatment and increased scrutiny. It requires women’s and girls’ teams and leagues to verify the gender, as defined by its terms, of their players to apply for access to Nassau County public facilities, a requirement that is not imposed on men’s and boys’ teams. It excludes women’s and girls’ teams and leagues that have or allow transgender women and girls to participate from accessing Nassau County public facilities.

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<sup>1</sup> The State includes the terminology used in Local Law 121-24 (“biological males” and “biological females”) but notes that these terms are neither accurate nor medically accepted and are viewed as derogatory to transgender women and girls. *See Blakeman v. James*, Opinion and Order, No. 24-cv-01655, fn.5 (E.D.N.Y. Apr. 4, 2024) (stating that the terms “biological males” and “biological females” are “scientifically ‘imprecise’ and are viewed as derogatory to transgender women and girls”). *See also* Wylie C. Hembree, Peggy T. Cohen-Kettenis, et al., *Endocrine Treatment of Gender-Dysphoric/Gender-Incongruent Persons: An Endocrine Society Clinical Practice Guideline*, 102, 11, *J. of Clinical Endocrinology & Metabolism*, 3869, 3875 (2017); *Glossary of Terms: Transgender, GLADD Media Reference Guide: 11th Edition*, GLADD, <https://glaad.org/reference/trans-terms/> (last visited Mar. 22, 2024).

39. Local Law 121-24 applies to approximately 100 different Nassau County public facilities available to and used by the public for sports-related activities. These public facilities include, among others, swimming pools, ice rinks, soccer fields, football fields, cricket fields, rugby fields, volleyball courts, baseball fields, softball fields, lacrosse fields, track and field facilities, basketball courts, tennis courts, handball courts, paddleball courts, and golf courses. The Mitchel Athletic Complex, for example, hosts a variety of local high school and collegiate athletic events, as well as local sports leagues.

40. Upon information and belief, there are a multitude of local and visiting sports teams from across the state that will participate in events held at these public facilities.

### **III. The Impact of Local Law 121-24 on All Women and Girls in the State of New York**

41. Local Law 121-24 requires the categorical exclusion of transgender women and girls from participation in any women's or girls' "sports, leagues, organizations, teams, programs, or sporting entities" at any "sporting events or competitions" taking place at Nassau County public facilities because they were assigned male at birth.

42. Local Law 121-24 facially denies transgender women and girls the ability to participate consistent with their gender identity and thus discriminates based on gender identity, which includes discrimination because of sex assigned at birth and transgender status.

43. Local Law 121-24's exclusion of transgender women and girls perpetuates harmful stereotypes and undermines the goals of the HRL and CRL, which guarantee all people in the State of New York equal access to public accommodations, equal protection of the laws, and protection from discrimination regardless of sex, gender identity, and/or gender expression.

44. Further, by limiting a participant's gender to exclusively what is denoted on the official birth certificate "filed at or near the time" of the participant's birth, Local Law 121-24 also

seeks to override rights granted to transgender women and girls under New York State law. The CRL affords individuals the right to be treated in accordance with their gender identity, including by obtaining legally amended or corrected birth certificates or court orders recognizing their gender identity.

45. Local Law 121-24 explicitly discriminates based on sex. A team or league designated for men or boys may receive a permit regardless of whether any participants were assigned female at birth. In contrast, a team or league designated for women or girls may not receive a permit if any participant was assigned male at birth.

46. Local Law 121-24 subjects women's and girls' teams and leagues to greater scrutiny, as they must meet gender verification requirements that do not apply to teams and leagues for men or boys. Local Law 121-24 requires women's and girls' teams to investigate and potentially disclose sensitive and private information of their participants. It invites challenges to the gender of a woman or girl participant and encourages harassment based on harmful gender stereotypes, perceptions, and attitudes about female bodies.

47. Local Law 121-24's discriminatory requirements coerce women's and girls' teams or leagues to either discriminate against transgender women and girls, in violation of New York State law, or find somewhere else to play.

48. Local Law 121-24's discriminatory requirements impact teams and leagues from across the State of New York that may want to hold or participate in events at Nassau County public facilities.

49. Upon information and belief, teams that include or welcome transgender members have decided they will forego applying to use Nassau County public facilities because of Local

Law 121-24. Local Law 121-24 has thus deprived New Yorkers of equal access to public accommodations and the exercise of their civil rights.

50. Despite Local Law 121-24's proffered justifications, at the Nassau County Legislative Committee hearing held on June 10, 2024, and again at the Nassau County Full Legislative Meeting on June 24, 2024, Deputy Nassau County Attorney Victoria LaGreca acknowledged there have been no incidents of harm to women or girls in Nassau County resulting from the participation of transgender women or girls on women's or girls' sports teams or leagues.

51. Defendants previously stated that they would deny permits to teams and leagues that failed to make the certification required by Executive Order 2-2024, and to women's and girls' leagues and teams that affirm that they include transgender women and girls among their participants. Upon information and belief, Defendants will also deny permits to teams and leagues that fail to make the same certification now required by Local Law 121-24, and to women's and girls' teams and leagues that affirm that they include transgender women and girls among their participants.

### **FIRST CAUSE OF ACTION**

#### **Violations of Article IX of the New York State Constitution and Municipal Home Rule Law Conflict with HRL §§ 291, 296**

(For Judgment Pursuant to CPLR § 3001 and Article 63)

52. The State incorporates by reference and repeats and realleges the allegations set forth above as if fully set forth herein.

53. Defendants' obligations to comply with and refrain from passing local laws inconsistent with the HRL is mandatory.

54. Pursuant to both N.Y. Const. Art. IX § 2(c) and N.Y. Mun. Rule Law § 10(1)(i), Defendants are not permitted to enact local laws that are inconsistent with any provision of the

HRL. Local laws that abrogate or curtail rights conferred by State law are inconsistent with State law, conflict preempted, and rendered invalid by operation of law.

55. Local Law 121-24 is inconsistent with and in violation of HRL § 291(2) and thus violates Article IX and MHRL because it abrogates the opportunity of transgender women and girls to use public accommodations without discrimination because of their sex, gender identity, and/or gender expression, which is a civil right.

56. Local Law 121-24 is inconsistent with and in violation of HRL § 296(2) and thus violates Article IX and MHRL because it discriminates against transgender women and girls, and women's and girls' teams that include or welcome them, because of sex, gender identity, and/or gender expression in places of public accommodation.

57. Local Law 121-24 is inconsistent with and in violation of HRL § 296(6) and thus violates Article IX and MHRL because it aids, abets, incites, compels and/or coerces other persons to discriminate against transgender women and girls, and women's and girl's teams that include or welcome them, because of sex, gender identity, and/or gender expression.

### **SECOND CAUSE OF ACTION**

#### **Violations of Article IX of the New York State Constitution and Municipal Home Rule Law Conflict with CRL § 40-c (For Judgment Pursuant to CPLR § 3001 and Article 63)**

58. The State incorporates by reference and repeats and realleges the allegations set forth above as if fully set forth herein.

59. Defendants' obligations to comply with and refrain from passing local laws inconsistent with the CRL is mandatory.

60. Pursuant to N.Y. Const. Art. IX § 2(c) and N.Y. Mun. Rule Law § 10(1)(i), Defendants are not permitted to enact local laws that are inconsistent with any provision of the

CRL. Local laws that abrogate or curtail rights conferred by State law are inconsistent with State law, conflict preempted, and rendered invalid by operation of law.

61. Local Law 121-24 is inconsistent with and in violation of CRL § 40-c and thus violates Article IX and MHRL because it denies transgender women and girls, as well as the women's and girls' teams that include or welcome them, the equal protection of the laws of the State of New York.

62. Local Law 121-24 is inconsistent with and in violation of CRL § 40-c and thus violates Article IX and MHRL because it subjects transgender women and girls, as well as women's and girls' teams that include or welcome them, to discrimination in their civil rights by a subdivision of the State because of sex, gender identity, and/or gender expression.

63. Local Law 121-24 is inconsistent with and in violation of CRL § 40-c and thus violates Article IX and MHRL because it restricts the determination of the gender, for purposes of obtaining a permit from Defendant County of Nassau, exclusively to the sex denoted on a participants' "official" birth certificate and only such birth certificate that was "filed at or near" the time of the participant's birth, contravening the civil rights of transgender women and girls under CRL § 67, and discriminating against them because of their sex, gender identity, and/or gender expression.

### **PRAYER FOR RELIEF**

**WHEREFORE**, the State respectfully requests this Court enter judgment against Defendants as follows:

- A. A declaratory judgment pursuant to CPLR § 3001 declaring that Local Law 121-24 is invalid and conflict preempted because it violates the inconsistency prohibitions of Article IX of the New York State Constitution and the New York Municipal Home Rule Law based



on its impermissible inconsistencies with New York Executive Law §§ 291(2), 296(2)(a), 296(6) and New York Civil Rights Law §§ 40-c; and

- B. A permanent injunction pursuant to Article 63 of the CPLR, prohibiting Defendants from implementing or enforcing Local Law 121-24 in any respect; and
- C. A judgment awarding the State any such other and further relief that the Court deems just, proper, and equitable.

**Dated:** July 15, 2024  
New York, NY

Respectfully submitted,

LETITIA JAMES  
Attorney General of the State of New York

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