

STATE OF NEW YORK  
SUPREME COURT OSWEGO COUNTY

Crystal Myers, Beth Salisbury,  
Eric Pappa and Vicki Parvese

Petitioners,

PETITION

-vs-

Index No.

Richland Fire District

Respondent.

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Petitioners allege as follows:

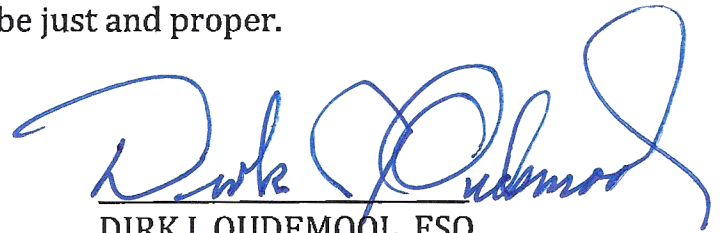
1. Upon information and belief, the Respondent is a duly created Fire District under the laws of the State of New York with its place of business located in the Town of Richland, Oswego County.
2. The Petitioners are residents and taxpayers of the Respondent Fire District.
3. The annual Budget Meeting of Respondent held on November 3, 2023 for its 2024 Budget was improperly noticed in violation of §181(3) Town Law in that it was not noticed and published as required by this section of law.

4. The Respondent failed to request the NYS Comptroller to advise it of its 2024 Tax limit as required by §3-c (7) General Municipal Law.
5. The Respondent on November 3, 2023 approved its 2024 Budget in the amount of \$180,000 which is an increase of over 100% of its 2023 Budget which was \$86,375.
6. The Respondent failed to adopt a resolution prior to the adoption of its 2024 Budget which authorized exceeding its tax cap limit as required by §3-c (5) General Municipal Law.
7. Attached as Exhibit A are the minutes of Respondent's October 19, 2023, November 3, 2023, and November 13, 2023 Commissioner meetings, which substantiate the fore-going allegations.
8. Attached as Exhibit B are Petitioners 2024 County and Town Tax bills which verify Respondent's 2024 illegal tax levy upon Petitioners properties.
9. Upon information and belief, Respondent has received or will receive shortly its \$180,000 2024 Tax levy before this proceeding is determined and to prevent the use of the \$93,625 illegally raised taxes, Petitioners request that said sum be ordered

immediately impounded pending a determination of this proceeding.

Wherefore, Petitioners request the Court to declare that Respondent failed to comply with New York Law in adopting its 2024 Budget and order Respondent to impound the illegally raised taxes in its 2024 levy, together with such other and further relief as may be just and proper.

Date: February 27<sup>th</sup>, 2024



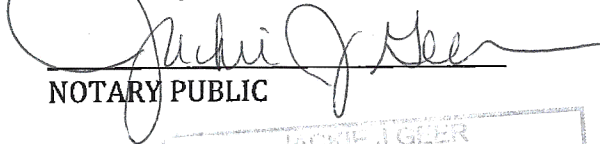
DIRK J. OUDEMPOOL, ESQ.  
Attorney for Petitioners  
Office and P.O. Address  
333 East Onondaga Street  
Syracuse, New York 13202  
Phone: (315) 474-7447

STATE OF NEW YORK )  
COUNTY OF Oswego ) SS:

The undersigned, **Crystal Myers**, being duly sworn, states that she has read the petition, the contents of the petition are true to deponents' own knowledge except as to those matters which are alleged on information and belief.



Sworn to before me this  
27<sup>th</sup> day of Feb., 2024.

  
NOTARY PUBLIC

JACKIE J. GLEER  
NOTARY PUBLIC, STATE OF NEW YORK  
Registration No. 01GE6064424  
Qualified in Oswego County  
Commission Expires September 24, 25

STATE OF NEW YORK )  
COUNTY OF Oswego ) SS:

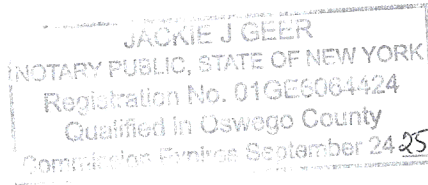
The undersigned, **Beth Salisbury**, being duly sworn, states that she has read the petition, the contents of the petition are true to deponents' own knowledge except as to those matters which are alleged on information and belief.

Sworn to before me this

27<sup>th</sup> day of Feb., 2024.

Beth A Salisbury

Jackie J Geer  
NOTARY PUBLIC



STATE OF NEW YORK )  
COUNTY OF Oswego ) SS:

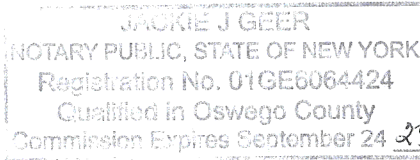
The undersigned, **Eric Pappa**, being duly sworn, states that he has read the petition, the contents of the petition are true to deponents' own knowledge except as to those matters which are alleged on information and belief.

Sworn to before me this

27<sup>th</sup> day of Feb., 2024.

Eric Pappa

Jackie J Geer  
NOTARY PUBLIC



STATE OF NEW YORK )  
COUNTY OF Oswego ) SS:

The undersigned, **Vicki Parvese**, being duly sworn, states that she has read the petition, the contents of the petition are true to deponents' own knowledge except as to those matters which are alleged on information and belief.

Sworn to before me this

27<sup>th</sup> day of Feb., 2024.

Vicki Parvese

Jackie J Geer  
NOTARY PUBLIC

