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January 6, 2025

## VIA ONLINE COMPLAINT FORM

Division of Election Law Enforcement  
NYS Board of Elections  
P.O. Box 739  
Albany, NY 12201

To Whom it May Concern:

We are writing to request that your office investigate Robert F. Kennedy Jr. for apparent violations of New York's Election Law by registering for and voting in the November 5<sup>th</sup>, 2024 general election from a New York residence at which he does not legally reside. N.Y. Elec. Law §§ 17-104(4) and 17-132(3).

New York statute provides that any person who “[k]nowingly votes or offers or attempts to vote at any election, when not qualified; or, ... Votes or offers or attempts to vote at an election, ... in an election district or from a place where he does not reside” is guilty of a felony. N.Y. Elec. Law § 17-132(3). It also provides that any person who “[k]nowingly gives a false residence within the election district when registering as an elector” is guilty of a felony. N.Y. Elec. Law § 17-104(4).

According to public records, Mr. Kennedy was registered to vote in New York from the address 84 Croton Lake Rd, Katonah, 10536 at the time of the November 2024 general election. The polling place assigned to this address was Bedford Town House, 321 Bedford Rd, Bedford Hills, 10507. Mr. Kennedy voted by mail and his ballot was received on November 2<sup>nd</sup>, 2024 by the Westchester county board of elections. A screenshot of the page containing this information, <https://voterlookup.elections.ny.gov/>, taken on December 23<sup>rd</sup>, 2024, is attached to this complaint.

The issue of Mr. Kennedy's residence was recently litigated in New York courts as a core question in a dispute about his ability to appear as a candidate for President of the United States on New York ballots. In August 2024, the Albany County Supreme Court found that Mr. Kennedy did not legally reside in his claimed New York address under New York election law. Cartwright v. Kennedy, 218 N.Y.S.3d 770 (N.Y. Sup. Ct.). The address at issue in that case is the same one that public records show he voted from in the 2024 November general election. Id. at 774.

The New York Third Judicial Department affirmed the Albany Supreme Court's opinion. Cartwright v. Kennedy, 230 A.D.3d 969 (2024). The court held that “petitioners have demonstrated by clear and convincing evidence that the Katonah address listed in the nominating petition was not Kennedy's residence under the Election Law.” Id. at 972-73. It noted that in the “15 months that Kennedy claimed the Katonah address was his residence, he admittedly only spent one night there and that was after he filed his nominating petition and after the media had

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questioned his stated residence. It also was not until this time that he began paying rent.” Id. at 973. Mr. Kennedy appealed the decision to the New York Court of Appeals and his appeal was denied. Cartwright v. Kennedy, 42 N.Y.3d 943 (2024) (N.Y. Sept. 10, 2024).

As the defendant in this case, Mr. Kennedy was clearly aware of the verdicts holding that he was not a legal resident of this Katonah address. Despite this undisputable knowledge, Mr. Kennedy voted from the property anyway. By knowingly voting from a residence that several New York courts had already determined was not his legal residence, Mr. Kennedy blatantly violated N.Y. Elec. Law § 17-132(3). By registering to vote at this address in the first place, Mr. Kennedy also likely violated N.Y. Elec. Law § 17-104(4).

There is demonstrable evidence that Mr. Kennedy illegally voted from an address that is not his residence. We urge your office to immediately commence an investigation into this matter and to act swiftly to enforce any violations of New York law.

Thank you for acting to preserve the sanctity of and uphold public confidence in our elections.

Sincerely,

DocuSigned by:  
  
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Caroline Ciccone  
President  
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