

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

GABRIEL THOMPSON,

Plaintiff,

-against-

SHAWYN PATTERSON-HOWARD, in her official
capacity as Mayor of the City of Mount Vernon, New York,
Defendant.

Index No. _____

Date Purchased: _____

To the above-named Defendant:

YOU ARE HEREBY SUMMONED to answer the Verified Complaint in this action and to serve a copy of your answer, or, if the Verified Complaint is not served with this Summons, to serve a notice of appearance, on the Plaintiff within twenty (20) days after the service of this Summons, exclusive of the day of service, or within thirty (30) days after service is complete if this Summons is not personally delivered to you within the State of New York. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Verified Complaint.

Dated: June 23, 2025

Mount Vernon, New York

Gabriel Thompson

Pro Se Plaintiff

33 Raynor Avenue, Mount Vernon NY 10552

(Phone) 206-310-0708

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SUPREME COURT OF THE STATE OF NEW
YORK COUNTY OF WESTCHESTER

-----X

GABRIEL THOMPSON,

Plaintiff,

Index No. 2025-_____

- against -

COMPLAINT

CITY OF MOUNT VERNON NEW YORK,
MAYOR SHAWYN PATTERSON-HOWARD and
JOHN DOES 1-10

Defendants.

-----X

TO THE SUPREME COURT OF THE STATE OF NEW YORK

The complaint of the plaintiff, Gabriel Thompson, respectfully shows and alleges as follows:

1. This is a taxpayer action pursuant to General Municipal Law § 51 to restrain and remedy illegal and unconstitutional use of public resources, including taxpayer funds and sworn law enforcement officers, by the Mayor of Mount Vernon for political and personal gain. The Plaintiff seeks declaratory and injunctive relief against continuing violations of the Mount Vernon City Code § 24-3, New York Public Officers Law § 74(3)(h), and New York Election Law § 17-158.

JURISDICTION AND VENUE

2. This Court has jurisdiction over this matter pursuant to CPLR § 301 and General Municipal Law § 51.

3. Venue is proper in this Court under CPLR § 503 as the events giving rise to this Complaint occurred in Westchester County, and the Defendants reside or operate therein.

PARTIES

4. Plaintiff is a resident and taxpayer of the City of Mount Vernon.

5. Defendant Shawyn Patterson-Howard is the Mayor of Mount Vernon, sued in her official capacity.

6. Defendant City of Mount Vernon is a municipal corporation.

7. Defendants John Does 1–10 are individuals yet to be identified who facilitated the conduct alleged.

FACTUAL ALLEGATIONS

8. During the period leading up to the May 20, 2025, Mount Vernon School Board Trustee and Library Board Trustee elections, Defendant Patterson-Howard misused her position as Mayor—and leveraged official city branding and resources—to publicly endorse candidates in what is intended to be a fair, nonpartisan election. In doing so, she disparaged opposing candidates and engaged in conduct that compromised public trust and safety. Specifically, upon learning of allegations that a close associate of one of her endorsed candidates was accused of sexually abusing a 14-year-old student, Defendant Patterson-Howard took it upon herself to warn the accused—thereby interfering with a potential criminal investigation. On information and belief, Defendant Patterson-Howard took this action because the accused individual, who later confessed to the abuse, was engaged to and residing with one of her preferred school board candidates.

9. Defendant Patterson-Howard also collaborated with a group known as Rise Up Mount Vernon, an unregistered political organization at the time, which appears to have

functioned as a political arm of her administration. On information and belief, Rise Up Mount Vernon was financially backed by developers who have contributed substantial sums to Defendant Patterson-Howard's political campaigns and who have received significant tax incentives from the City to construct low-income housing projects. These developments have provided little demonstrable return on investment to Mount Vernon residents and raise serious concerns about pay-to-play governance, improper influence, and misuse of public resources for political advancement.

10. Defendant Patterson-Howard is currently engaging in the same activity for the election to be held on Tuesday, June 24, 2025.

11. In addition to sending out mailers to Mount Vernon households, Defendant Patterson-Howard openly campaigned for candidates, obtained petition signatures, signed petitions, attended fundraising events, held public campaign forums, and distributed fraudulent campaign materials. Defendant Patterson-Howard engaged in this electioneering activity using city resources, including a security detail staffed by an active-duty Mount Vernon police officer, and at times when she should have been performing her duties as mayor – a job for which she is paid \$200,000, after recently granting herself an astounding 40% raise—a raise that was hidden from public scrutiny until it was too late for the public to act against it.

Unauthorized Use of Police for Personal and Political Purposes

12. Throughout her tenure as mayor, multiple Mount Vernon residents have personally witnessed Defendant Patterson-Howard's regular and inappropriate use of a personal "security detail" — comprised of Mount Vernon Police Department (MVPD) detectives — including for political campaigning, personal events, and out-of-town

travel, without proper legal authority, council approval, or budgetary allocation. Specifically, the Mount Vernon City Charter contains no provision authorizing the assignment of a “driver” or “security detail” for the mayor. The term “detail” appears only once in the charter in reference to investigatory assistance to the Corporation Counsel (Charter §161). Similarly, the City’s administrative code and budget contain no authorization or funding lines for a dedicated protective detail for the mayor. There is no transparent or itemized accounting for this expense.

13. Alarming, the mayor not only uses this “security detail” as her personal taxicab when traveling around Mount Vernon’s mere 4.5 square miles, but she also travels with this detail. Specifically, at the [January 13, 2025, meeting of the Board of Estimate and Contract, Defendant Patterson-Howard clearly states \(timestamp 2:10\) that she will attend the U.S. Conference of Mayors in Washington, D.C. with her “security detail,”](#) despite the fact that approval by [council resolution](#) was granted only for the mayor and her chief of staff — not for a “security detail.” See [Jan. 13 BOE Meeting](#).

14. These detective assignments are a gross misuse of public funds, costing Mount Vernon taxpayers hundreds of thousands of dollars annually in salary, overtime, pension contributions, benefits, and unauthorized travel.

15. These abuses occur at a time when Mount Vernon is short on patrol officers, crime is rampant, Mount Vernon has the highest tax rate, and worst city services, in all of Westchester County.

16. Despite numerous public objections and credible reports raising concerns about this misuse of public resources by Defendant Patterson-Howard, no Mount Vernon elected official has taken formal action or issued a public statement condemning or

investigating this conduct. This ongoing silence by other city officials underscores a systemic failure to uphold basic standards of ethical governance and reinforces the need for taxpayer intervention under General Municipal Law § 51.

Misuse of City Resources in the May 20, 2025 School Board Election

17. In the month leading up to the May 20, 2025, School and Library Board Trustee election, Defendant Patterson-Howard used official city branding and resources to publicly endorse her own slate of candidates and disparage opposing candidates.

18. On or around May 15, 2025, a citywide mailer was sent under the personal name and apparent authority of Defendant Patterson-Howard, in her capacity as mayor. Ex. A. The return address is listed as 642 Locust Street, Mt. Vernon, NY 10552—the home address of one of the candidates endorsed by the mayor. The envelope bears the bold headline: “**AN IMPORTANT MESSAGE FROM YOUR MAYOR – TIME SENSITIVE OPEN IMMEDIATELY**,” signaling official importance.

19. The mailer is professionally printed in color and appears formatted in an official government-style layout. Defendant Patterson-Howard is prominently featured in both the header of the letter and multiple areas throughout the mailer, including images and a digital signature. The letter is formatted like an official communication from a municipal authority rather than a candidate or campaign committee.

20. The letter explicitly endorses and advocates for three candidates in the May 2025 Mount Vernon School Board Election, including their names and ballot positions: Sakai Brown (4A), Erica Peterson (6A), and Randolph Scott (7A). These endorsements are repeated several times, with voting lines listed and boxed, urging the reader to cast their

vote accordingly. The endorsement appears in both narrative and visual formats (*e.g.*, a detachable sample ballot listing the three candidates).

21. Defendant Patterson-Howard instructs residents: “Call your neighbors. Talk to your friends. Make a plan to vote on May 20.” She further states: “Together, we can take back our schools—and secure the future our children and community deserve.” The mailer includes extensive negative commentary about current school board leadership, including accusations of fiscal mismanagement, loss of federal funds, school closures, teacher layoffs, and underperformance. Also included are specific claims such as: “\$10 million overpayment to the IRS,” “creation of 13 middle schools without a financial plan,” and “federal investigations over mismanaged grant funds.”

22. The Mayor’s title and office are invoked at the top of each page: “Mayor Shawyn Patterson-Howard,” with date “May 2025.” Her photo in official dress appears on all pages. She signs the letter: “In solidarity and faith, Mayor Shawyn Patterson-Howard”—again invoking the authority of her public office.

23. At the bottom of one of the pages, Defendant Patterson-Howard includes the official campaign cards of the three endorsed candidates.

24. On or around May 19, 2025, the mayor hosted the three candidates as part of an on-line forum on the social media platform Facebook. Although this forum was hosted from what appears to be Defendant Patterson-Howard’s personal Facebook page, she used her official title, “Mayor Shawyn Patterson.”

Shawyn's posts



Discussion with School Board Candidates Sakai Brown (4A)... See more



25. In addition to these documented events, Mount Vernon residents reported seeing Defendant Patterson-Howard at multiple campaign related events—with *the security detail*—and, on election day, at polling locations, electioneering on behalf of her three candidates.

26. After the election, Defendant Patterson-Howard sent the following message from her official mayoral account: “Congratulations to the new School Board Trustees Sakai Brown, Erica Peterson and Randolph Scott and Library Trustees Cynthia Crenshaw and Cynthia Dickerson. Thank you to all who offered themselves for service. Thank you Mt. Vernon voters.” Following the message are the official campaign materials of the three School Board Trustee, and the two Library Board Trustee candidates.



Patterson-Howard Alerts Child Molester of Pending Allegations

27. On or around April 28, 2025, Defendant Patterson-Howard was sent a text message alerting her to deeply troubling allegations concerning an individual closely associated with her:

Separately, I'm hearing troubling reports that a middle-aged close associate of yours is accused of having inappropriate physical relations with a 14-year-old eighth grader and of stealing from a nonprofit organization. It is also being reported that you were aware of both allegations. Is this true?"

Ex. B (Screenshot of Text).

28. This message did not include the name of any individual, nor did it provide identifying details. Despite this, what followed raises serious questions about Defendant Patterson-Howard's judgment, priorities, and potential obstruction of justice.

32. On information and belief, Defendant Patterson-Howard not only shared the text message with Murray, but she summoned him to her office at City Hall to do so.

33. On May 15, 2025, following a press conference by Westchester County District Attorney Susan Cacace announcing Murray's arrest, Defendant Patterson-Howard issued a public statement claiming that she had recently received "a vague, anonymous, and suspicious text message containing allegations of sexual misconduct." The mayor stated:

While the message lacked specific details and appeared politically motivated, I did not hesitate to act. . . . Allegations of this nature must always be treated with urgency and care I immediately contacted the Westchester County District Attorney's Office I treat all allegations of sexual abuse with the gravity they deserve and have followed all proper protocols to allow justice to take its full and fair course.

34. Defendant Patterson-Howard's statement omitted several critical facts: (1) that she contacted the accused directly before, or in very close proximity to, contacting the District Attorney, (2) that she somehow identified Dwayne Murray as the subject of a "vague, anonymous" complaint, and (3) that summoning an alleged child molester to City Hall and personally disclosing the complaint cannot reasonably be construed as "following proper protocols."

35. These actions raise serious concerns about Defendant Patterson-Howard's judgment, her potential interference with an active or anticipated criminal investigation, and her motivations for prioritizing communication with the alleged perpetrator over immediate notification to law enforcement authorities. They also call into question whether her actions were motivated by her political alliance with Murray during a contested local election. Notably, Murray was previously engaged to, and still living with,

school board trustee candidate Erica Petersen, whom Defendant Patterson-Howard publicly supported.

Ongoing Electioneering Ahead of the June 24, 2025, Democratic Primary

36. In the lead-up to the June 24, 2025, Democratic Primary—an election for three City Council seats, one City Court Judge, and the City Comptroller—Mayor Shawyn Patterson-Howard openly and aggressively used the prestige of her office, along with the appearance of official city communications, to advance a personal political agenda.

Campaigning and Certifying Petitions

37. Throughout May 2025, residents across Mount Vernon reported seeing Mayor Patterson-Howard actively campaigning for her chosen City Council candidates, Elvira Castillo and Cynthia Turnquest-Jones. These activities occurred during normal working hours and were undertaken while she was drawing a taxpayer-funded salary of nearly \$200,000 annually. Rather than performing the duties of her office, she was seen soliciting petition signatures and personally promoting her political allies.

38. This political activity culminated in the mayor acting as a subscribing witness on an official 2025 Democratic designating petition sheet, where she affirmed—under penalty of perjury—that she observed 15 individuals sign in support of a candidate. The document, dated March 2, 2025, includes her name, residential address, and signature. When considered alongside her broader pattern of electioneering, this certification reflects an alarming willingness to flout the ethical and legal boundaries that separate governance from political partisanship.

Misuse of Official Communications and City Resources

39. On or about June 20, 2025, just days before the primary election, a full-color citywide mailer was distributed under the personal name and perceived authority of Mayor Shawyn Patterson-Howard. The envelope was labeled: “**AN IMPORTANT MESSAGE FROM YOUR MAYOR – TIME SENSITIVE – OPEN IMMEDIATELY,**” giving the distinct impression of an official government communication. The return address was listed as P.O. Box 492—an entity whose ownership is unclear and whose connection to the mayor’s campaign is undisclosed. Ex. C.

40. Inside, the mailer prominently features the mayor’s title, headshot, digital signature, and the formal municipal designation: “Mayor Shawyn Patterson-Howard, City of Mount Vernon, New York – JUNE 2025.” The language, format, and layout are styled to resemble an official notice from City Hall.

41. The mailer is professionally printed and carefully structured to mimic a government bulletin. It includes the mayor’s full name, formal greeting, and an appeal written “in service and gratitude.” Most egregiously, the piece includes a deceptive “sample ballot” that lists only the candidates endorsed by the mayor—presented as if it were an official voter guide. The “sample ballot” is designed to be cut out and brought to the polls.

42. The content of the mailer is unmistakably intended to influence the outcome of the Democratic Primary. It includes repeated endorsements of five specific candidates: Darren Morton for Comptroller (2A), Cathlin Gleason for City Council (4A), Elvira Castillo (6A), Cynthia Turnquest-Jones (7A), and Danielle Browne for City Judge (10A).

These endorsements are reinforced both in the body of the letter and in the fraudulent sample ballot.

43. Defendant Patterson-Howard issues multiple direct appeals to the reader: “...you have the power to set Mount Vernon up for success.” “...support these five Democrats working towards a brighter future.” “That’s why I’m supporting these five Democrats on June 24.”

44. These statements are not mere expressions of political opinion—they are calls to action issued under the authority of a sitting mayor using the symbols and structure of government communication.

45. Defendant Patterson-Howard goes further by touting city-funded programs and taxpayer-backed infrastructure investments as justification for her endorsements: “Over the past five years we have navigated...” “We’ve emerged from this chaotic period with a new comprehensive plan...” She lists supposed accomplishments (*e.g.*, \$350M investments, hospital renovation, infrastructure improvements) to build credibility for her political endorsements. This connects city-funded improvements to the political slate she is promoting, giving the impression of an officially sanctioned or endorsed ticket.

46. Perhaps most offensively, Defendant Patterson-Howard includes a fraudulent “sample ballot” that eliminates all but her own slate and encourages residents to “take it with you to vote”—a calculated effort to influence voter behavior using the mayor’s public office as the messenger.



47. The so-called “sample ballot” included in the mailer is misleading and misrepresents the true nature of an official sample ballot. A legitimate sample ballot is intended to accurately reflect all candidates running for office in a given election, enabling voters to make informed choices. In contrast, this mailer presents only the mayor’s hand-picked slate of candidates, omitting all others who appear on the actual June 2025 Democratic Primary ballot. This selective presentation distorts the election landscape and misleads voters into believing these are the only available options.

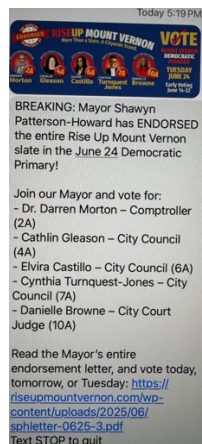
48. Furthermore, despite being labeled a “sample ballot,” the document functions as clear campaign literature. It includes photographs, ballot line numbers, and promotional framing for each of the five endorsed candidates—elements typically found in partisan palm cards or campaign flyers. The directive to “cut and take with you to vote” mimics traditional political tactics, not a neutral voter guide that one would expect to originate from the Office of the Mayor. The use of official titles and the city’s branding compounds the misleading nature of the material.

49. For reference, a true sample ballot—such as that issued by the Board of Elections—lists all certified candidates for each office and does not single out or promote a preferred slate. The mayor’s flyer fails to meet this standard and instead serves to improperly influence the electoral process under the guise of an official communication.

Office	12		3456789						1011		
	Comptroller		Councilmember						City Court Judge		
	(Vote for one)		(Vote for up to three)						(Vote for one)		
	<input type="radio"/> 1 Democratic	<input type="radio"/> 2 Democratic	<input type="radio"/> 3 Democratic	<input type="radio"/> 4 Democratic	<input type="radio"/> 5 Democratic	<input type="radio"/> 6 Democratic	<input type="radio"/> 7 Democratic	<input type="radio"/> 8 Democratic	<input type="radio"/> 9 Democratic	<input type="radio"/> 10 Democratic	<input type="radio"/> 11 Democratic
Democratic	Benjamin A. Montgomery	Darren M. Morton	Andre D. Wallace	Cathlin B. Gleason	Tanesia M. Walters	Elvira M. Castillo	Cynthia A. Turnquest	Nick Mastrogiorgio	Bill A. Schwartz	Danielle R. Browne	Peter Davis
Write-In	Write-In		Write-In		Write-In					Write-In	

50. Making matters worse, Defendant Patterson-Howard did not conduct these political activities in a private capacity. On numerous occasions, she was seen campaigning across the City of Mount Vernon accompanied by her official police “security detail.” This detail—comprised of active-duty police officers and funded with taxpayer dollars—was visibly present at multiple political events and while the mayor was distributing or promoting campaign materials for her slate. This further demonstrates the improper use of city personnel and resources to support partisan objectives and raises serious questions about the misuse of public funds, abuse of authority, and neglect of official mayoral duties.

51. On June 21, 2025, Rise Up Mount Vernon and Defendant Patterson-Howard sent the following text blast out to an untold number of people:



52. The bottom of the message includes a Rise Up Mount Vernon link that leads recipients to the citywide mailer containing the fraudulent “sample ballot.”

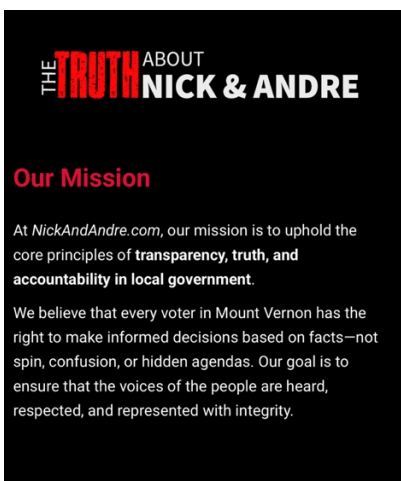
Other Misuses of Power and Authority

53. Defendant Shawyn Patterson-Howard’s electioneering activities are not isolated incidents. Rather, they reflect a broader pattern of misusing the power and prestige of her public office to intimidate, defame, and advance personal political objectives—often under a veil of officialdom or anonymity.

Defamatory Website Promoted by Patterson-Howard Allies

54. On or around June 20, 2025, a political organization known as “Rise Up Mount Vernon”—which, on information and belief, acts as a political surrogate for Defendant Patterson-Howard—launched a website designed to defame Democratic City Council candidates Nicholas Mastrogiorgio and Andre Wallace. The site is styled in the format of political opposition research and contains personal photographs, disparaging statements, and misleading or inflammatory narratives about the candidates. At the bottom of the site, in small print, is the disclaimer: “Paid for by Rise Up Mount Vernon.”

55. The design, tone, and timing of this website make it indistinguishable from a digital extension of Defendant Patterson-Howard's campaign efforts. Its content closely mirrors language and tactics seen in the mayor's other campaign literature and mailers, reinforcing the inference of a coordinated and sanctioned smear campaign.



56. The nature of the site—anonymous in design but clearly affiliated with political operatives closely aligned with Defendant Patterson-Howard—illustrates a calculated attempt to undermine political opponents while shielding the mayor from direct accountability. The site's launch in the final days before the June 2025 primary suggests a deliberate strategy to cause reputational harm with minimal time for rebuttal or correction.

Coordinated Smear Campaign via Social Media

57. In addition to the defamatory website, Defendant Patterson-Howard and her allies are believed to have initiated a coordinated telephone and social media campaign around the same time, soliciting individuals to publicly attack and discredit opposition candidates online. Several individuals who received these calls have come forward, stating that Mayor Patterson-Howard personally asked them to post defamatory content on social

media targeting specific candidates in the primary. These individuals declined the request and reported the outreach to the affected candidates.

CLOSING STATEMENT

58. Rarely in the history of Mount Vernon has a public official so thoroughly betrayed the public trust as Defendant Shawyn Patterson-Howard. Her conduct reflects not mere lapses in judgment but a calculated and ongoing pattern of corruption, self-dealing, and abuse of power that demands urgent legal and judicial intervention.

59. This is not a case of isolated misconduct. Through her misuse of city resources—including police officers, public funds, and the prestige of her office—for explicitly political purposes, Defendant Patterson-Howard has violated not only the letter of the law, but the very principles of ethical governance. She has blurred the line between public duty and political ambition to a degree that can no longer be ignored.

60. From orchestrating city-funded mailers that masquerade as official government communications, to employing sworn law enforcement officers as personal escorts during partisan campaign activities, to summoning a soon-to-be-arrested child predator to City Hall for a private audience before alerting law enforcement, her actions represent a stunning abuse of the mayoral office.

61. This is not politics as usual. This is a fundamental perversion of the public's trust and a misuse of taxpayer resources for personal and political enrichment. Never has there been a mayor with so little respect for the office, or for the people in whose name she holds such office.

62. The public deserves—and the law demands—better. Through this action, Plaintiff seeks to vindicate the rule of law, to restore the boundaries between official conduct and

political gain, and to compel accountability from an elected official who has placed herself above both ethics and law.

63. Plaintiff therefore respectfully prays that this Court grant declaratory and injunctive relief, require restitution of misused public funds, and take all necessary measures to restrain further abuses, safeguard the integrity of municipal government, and restore lawful order to the administration of the City of Mount Vernon.

CLAIMS FOR RELIEF

FIRST CAUSE OF ACTION—Violation of Mount Vernon City Code § 24-3

64. Defendants used their official position and city assets to benefit partisan political campaigns, in violation of the ethical standards of conduct required by the City Code.

SECOND CAUSE OF ACTION— Violation of Mount Vernon City Charter § 23

65. Defendant Patterson-Howard's use of an undisclosed and unauthorized police detail violates Mount Vernon City Charter § 23 and constitutes waste and theft of municipal resources.

THIRD CAUSE OF ACTION— Violation of Election Law § 17-158

66. Defendants used government funds and personnel to prepare and distribute political endorsements.

FOURTH CAUSE OF ACTION— Violation of Public Officers Law § 74(3)(h)

67. Defendants Patterson-Howard used her public position and public funds and resources to secure unwarranted privileges and influence political campaigns.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Declare that Defendants' conduct violated city and state law.
- B. Enjoin further political activity using public resources.
- C. Order restitution or reallocation of improperly used public funds.
- D. Grant such other relief as the Court deems just and proper.

Dated: June23, 2025



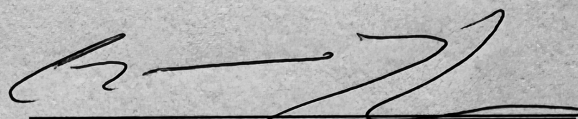
Gabriel Thompson, Pro Se Plaintiff
33 Raynor Avenue
Mount Vernon, New York 10552

VERIFICATION

Gabriel Thompson, being duly sworn, deposes and says:


I am the *pro-se* plaintiff in the above-entitled action. I have read the foregoing complaint and know the contents thereof.

The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters, I believe them to be true.



Gabriel Thompson
Pro Se Plaintiff

Sworn to before me this
23rd day of June 2025


Notary Public

KYVAUGHN BROWN
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01BR0030223
QUALIFIED IN WESTCHESTER COUNTY
MY COMMISSION EXPIRES OCTOBER 25, 2028