

SUPREME COURT  
STATE OF NEW YORK COUNTY OF TOMPKINS

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In the Matter of the Application of

FLX STRONG by its President Kenneth Wolkin and CAYUGA  
LAKE ENVIRONMENTAL ACTION NOW by its President John  
V. Dennis,

**AFFIRMATION OF  
SABRINA  
JOHNSTON**

Petitioners,

Index No.:

For a Judgment Under Article 78 of the Civil Practice Law And  
Rules,

vs.

TOWN OF LANSING ZONING BOARD OF APPEALS,  
TERAWULF INC., CAYUGA OPERATING COMPANY LLC,  
LAKE HAWKEYE LLC, and FRED DELFAVERO,

Respondents.

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I, Sabrina Johnston, of legal age, affirm under penalty of perjury pursuant to N.Y.

C.P.L.R. § 2106 the following:

1. I am a resident of the Town of Lansing and reside with my husband Harold Mills at 110 Ludlow Road in the Town of Lansing.
2. I am the elected Treasurer of FLX Strong and a member of the organization.
3. I am trained and experienced as an accountant. In my role as Treasurer, I am responsible for overseeing the handling of the group's funds.
4. As explained in my husband's affirmation, we own two adjacent parcels, totaling 28 acres (the "Property"), which includes the parcel with our residence at 110 Ludlow.

5. I have reviewed Harold's affirmation and share his concerns about the negative impacts the Project may have on the use and enjoyment of our residence, including negative impacts associated with noise and light. I am very sensitive to noise, especially at night, and am very concerned that noise from the data center's operation and construction will disturb my relaxation and sleep.

6. The proposed development of a data center and its constant 24/7 noise pollution is out of character with the quiet, rural community that attracted us to the Property and which we derive pleasure from. I am very concerned that the light and noise from the Project will diminish our ability to enjoy the outdoors at our property and prevent us from having our windows open during the warmer months.

7. We host an annual retreat for our church in September each year at the Property, which includes both indoor and outdoor activities. I am very concerned that the construction and operation of the data center and its constant noise will disturb our guests and prevent us from being able to host the event every year as we have.

8. In addition to the negative impacts at the Property, I am also concerned about the negative impacts the Project may have on my recreational activities in the area.


9. I regularly visit Cayuga Shores Wildlife Management Area for hiking and to experience nature. Cayuga Shores is directly north of the Milliken Station site and it is located less than 500 feet from the proposed location of the data center.

10. I have reviewed Harold's affirmation in which he states that, because Cayuga Shores is so close to the data center, operational noise from the data center will likely be audible in a large part of Cayuga Shores much of the time, regardless of propagation conditions. This is

very concerning to me because I visit Cayuga Shores to experience and enjoy the natural surroundings and wildlife.

11. An increase in industrial/manmade noise from the data center at Cayuga Shores will reduce my enjoyment of this important recreational activity of mine and it may diminish the quality of this protected wildlife resource.

Pursuant to N.Y. C.P.L.R. 2106, I affirm this 28<sup>th</sup> day of January 2026, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

  
Sabrina Johnston