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VIA HAND DELIVERY

December 6, 2023

Tamara Rueda, Clerk
Kennebec County Superior Court
1 Court Street, Suite 101
Augusta, ME 04330

Re: Christopher Christie v. Shenna Bellows, in her official capacity as the Maine Secretary of State, Civil Action, Docket No. AUGSC-CV-23-

Dear Ms. Rueda:

On behalf of Plaintiff, Christopher Christie, please find enclosed for filing to commence the above action the following items:

1. Petition for Review of Christopher Christie (with Exhibits); and
2. Civil Summary Sheet.

I am enclosing our check in the amount of \$175 in payment of the filing fee.

Thank you for your kind assistance: If you should have any questions, please do not hesitate to contact our office directly.

Very truly yours,

Fred W. Bopp III /KCS

Fred W. Bopp III
Enclosures

cc: Drew Watkins, Esq. (via email only)
Caleb Acker, Esq. (via email only)
Ken Daines, Esq. (via email only)

STATE OF MAINE
KENNEBEC, ss.

SUPERIOR COURT
Civil Action
Docket No. _____

CHRISTOPHER CHRISTIE,)
)
Petitioner,)
)
v.)
)
SHENNA BELLOWS, in her official)
capacity as the Maine Secretary of State,)
)
Respondent.)

**PETITION FOR REVIEW OF
CHRISTOPHER CHRISTIE**

Pursuant to Maine Rule of Civil Procedure 80(C), Christopher James Christie, by and through undersigned counsel, hereby petitions this Court for review of the final order issued by Respondent Secretary of State Shenna Bellows on December 1, 2023. A copy of the final order is attached hereto as Exhibit A. The final order notified Petitioner that Petitioner would not qualify for ballot access to the 2024 Republican presidential primary ballot because he lacked the requisite number of signatures. Petitioner is aggrieved by that final order because (1) he gathered and timely submitted at least 3,142 signatures, many of which were pre-verified as valid and certifiable; (2) the signatures should have been certified by the municipalities that received them, regardless of municipality; (3) Augusta's rushed and incomplete process deprived Petitioner of lawful process in the certification of signatures; and (4) Petitioner will be errantly excluded from the ballot. In support, Petitioner states as follows:

PARTIES

1. Petitioner Christopher James Christie is a candidate for President of the United States of America.

2. Respondent Shenna Bellows is Secretary of State of the State of Maine. The Secretary's office is located at 148 State House Station, Augusta, Maine 04333-0148.

BALLOT ACCESS RULES

3. Presidential primary ballot access in Maine is governed by 21-A M.R.S. § 331 et seq. and by 21-A M.R.S. § 442 et seq.

4. Candidates for the office of the President of the United States must submit petitions signed by at least 2,000 and not more than 2,500 voters. 21-A M.R.S. § 335(5)(B-3).

5. Pursuant to 21-A M.R.S. § 335(2)-(3), a primary petition must be signed "by voters of the electoral division which is to make the nomination and who are enrolled in the party named in the petition[.]" and "[t]he voter must personally sign that voter's name in such a manner as to satisfy the registrar of that voter's municipality that the voter is a registered voter and enrolled in the party named on the petition."

6. Pursuant to the presidential-primary-specific rules set forth in 21-A M.R.S. § 442, "[p]etitions must be delivered to the registrar, or clerk at the request or upon the absence of the registrar, for certification by 5 p.m. on November 20th of the year prior to a presidential election year. Petitions must be completed and filed with the Secretary of State no later than 5 p.m. on December 1st of the year prior to a presidential election year."

7. "The registrar, or clerk at the request or upon the absence of the registrar, of each municipality concerned shall certify which names on a petition appear in the central voter registration system as registered and enrolled voters in that municipality and may not certify any names that do not satisfy subsection 3." 21-A M.R.S. § 335(7)(B).

8. “When presented with a primary petition, the Secretary of State shall review it and, if the petition contains the required number of certified names and is properly completed, shall accept and file it.” 21-A M.R.S. § 337.

9. Pursuant to 21-A M.R.S. § 196-A, municipal election officials have access to the Central Voter Registration (“CVR”) system, which is a uniform, computerized list maintained electronically at the State level that contains information about the name and registration information of every legally registered voter in the State, and municipal election officials may access the information “for the purposes of election . . . administration.”

10. Pursuant to 21-A M.R.S. § 196-A(E), any governmental entity may request voter information for authorized use.

11. Respondent may issue guidance to municipal election officials concerning issues germane to their statutory duties. *See All. for Retired Ams. v. Sec’y of State*, 240 A.3d 45, 55 (Me. 2020).

12. Respondent’s guidance to candidates, attached as Exhibit B, states that “a petition form signed by voters from multiple municipalities will not be invalidated on that basis.” State of Maine Candidate’s Guide to Ballot Access for the March 5, 2024 Presidential Primary, <https://www.maine.gov/sos/cec/elec/candidate/pdfs/guidetoballotaccess2024.pdf> (last accessed December 4, 2023). Respondent’s guidance does not prohibit submitting petition forms with signatures from multiple municipalities, instead advising that a “separate petition form should be used for each municipality in which signatures are submitted . . . for ease of municipal verification of voters.” *Id.* (emphasis added).

13. Maine’s petition form itself is designed in such a way to accommodate the collection of signatures from multiple municipalities instead of only one. For example, Maine’s

petition sheet form includes a “municipality” column on the right side that allows voters to write their own respective municipality of registration, as opposed to only allowing for one municipality to be listed. *See* Exhibit B at 2; Exhibit C.

FACTUAL BACKGROUND

14. During the Fall of 2023, Petitioner, through his campaign committee, Chris Christie for President, Inc. (the “Campaign”), began to seek access to the 2024 Maine Republican presidential primary ballot.

15. The Campaign hired Qualify Candidates, a petition-gathering firm, to collect petition signatures from qualified voters as required by the above-referenced laws to satisfy the qualification requirements for the 2024 Maine Republican presidential primary ballot. Exhibit G, Watkins Dcl. ¶ 5.

16. Qualify Candidates contracted with Jordan Brownstein of The Human Connection LLC to operate as ground manager for the signature-gathering process. Exhibit G, Watkins Dcl. ¶ 5.

17. Brownstein and The Human Connection executed a plan to gather at least 4,000 signatures to ensure the requisite threshold of 2,000 certified signatures would be satisfied. Exhibit D, Brownstein Dcl. ¶ 4.

18. In so doing, Brownstein and The Human Connection relied extensively on Respondent’s guidance listed above in ¶¶ 12–13 and understood the guidance to mean that municipalities were permitted to certify signatures on submitted petition sheets containing signatures of voters from multiple municipalities. Exhibit D, Brownstein Dcl. ¶ 4.

19. Relying on that guidance, Brownstein and The Human Connection attempted to separate signatures by municipalities but determined it permissible to submit petition forms signed

by voters from multiple municipalities and that valid signatures would still be counted on such submissions. As a result, many of the submitted petition forms ultimately included signatures of voters from multiple municipalities. Exhibit D, Brownstein Decl. ¶¶ 5–6.

20. Qualify Candidates and Brownstein and The Human Connection collected and submitted at least 5,558 signatures to 22 different Maine municipal registrars on November 20, 2023.¹ Exhibit D, Brownstein Decl. ¶ 8.

21. Andrew Watkins, counsel for the Campaign, received a phone call from Augusta City Clerk Kelly Gooldrup on November 20, 2023, after petition sheets were submitted to the City of Augusta. Gooldrup told Watkins that the Augusta office was short-staffed and backed up. Gooldrup estimated that fewer than 50 of the 390 submitted petition sheets lacked an Augusta signature. Gooldrup confirmed that the office would verify all Augusta signatures, including those interspersed with signatures from other municipalities. Exhibit G, Watkins Decl. ¶ 7.

22. On November 29, 2023, Watkins called the Augusta City Clerk’s office and spoke with a female employee who notified Watkins that there was no update on the certification process of the Campaign’s petition sheets or when they would be completed. The employee told Watkins the office would call him when the process was complete and that Watkins should not call the Augusta office again. Exhibit G, Watkins Decl. ¶ 8.

23. Also on November 29, 2023, Watkins called the Secretary of State’s office and spoke with Heidi Peckham, Director of Elections, to schedule an appointment for the Campaign to drop off petition signatures with their office on December 1, 2023, at 11:00 a.m. Eastern Time. Exhibit G, Watkins Decl. ¶ 9.

¹ The Campaign submitted some number of signatures to Winslow, Maine at 5:58 p.m. on November 20, 2023, after the 5:00 p.m. deadline. These included a number of signatures from Winslow as well as other small municipalities. The exact number of signatures in this batch of petitions is unknown, but, based on the Campaign’s re-collection of petition sheets from municipalities, at least 3,142 signatures were timely submitted to other municipalities.

24. On November 30, 2023, one day before the Secretary of State deadline, Watkins again called the City Clerk's office for an update and whether the Campaign needed to reschedule the Campaign's December 1st meeting scheduled with the office of Respondent at 11:00 a.m. Watkins was told by the same female employee that Watkins "probably should" reschedule the deadline appointment. Watkins was told by the employee that "no," the certification process would not be completed on November 30, 2023, and again told Watkins not to call the office. Exhibit G, Watkins Decl. ¶ 10.

25. Later the same day of November 30, 2023, Watkins called the Augusta City Clerk office once more and left a voicemail for Gooldrup asking for a return phone call. Exhibit G, Watkins Decl. ¶ 11.

26. Later the same day of November 30, 2023, Watkins called Deputy Secretary of State Julie Flynn to explain the issues with the Augusta City Clerk's office ahead of the December 1, 2023 deadline. Deputy Secretary Flynn indicated that her office would inquire into the matter and contact Watkins. Exhibit G, Watkins Decl. ¶ 12.

27. Later the same day of November 30, 2023, Director of Elections Heidi Peckham called Watkins and informed him that the Secretary's office had contacted the Augusta City Clerk and learned that the Augusta City Clerk's office was operating under the errant belief that the signature certification deadline was December 5, 2023, not December 1, 2023. Director Peckham notified Watkins that the Augusta City Clerk's office indicated to the Secretary's office that the municipal officers would work after hours to certify the signatures through to the following morning of the deadline date. Exhibit G, Watkins Decl. ¶ 13.

28. The Campaign accordingly rescheduled its appointment with the Secretary's office to 3:00 p.m., December 1, 2023, to accommodate Augusta's delay resulting from a mistaken belief regarding the statutory deadline. Exhibit G, Watkins Decl. ¶ 13.

29. On information and belief, the municipal election office in Augusta did not finish its certification process until December 1, 2023, the deadline for submission to Respondent.

30. The City of Augusta election officials only certified 312 signatures. Exhibit G, Watkins Decl. ¶ 14.

31. Michael Butterworth, a subcontractor of the Campaign, independently validated 646 signatures of voters registered in the City of Augusta. Butterworth's company has developed a sophisticated software and has substantial experience using it to verify voters' registration information; he is confident this number is highly accurate and should correlate to the municipality's official findings. Exhibit E, Butterworth Decl. ¶¶ 4–5.

32. For example, Butterworth's independently validated signatures for Bangor totaled 260, and the official number certified by Bangor's municipal election officials was close to that at 307 certified signatures, as Butterworth would have expected. Butterworth accordingly expected similarly equivalent numbers in Augusta, but was surprised to learn of the disparity in juxtaposition with his numbers. Exhibit E, Butterworth Decl. ¶ 6.

33. The Campaign collected an estimated total of at least 3,142 signatures from the municipalities after the initial certification process. These 3,142 signatures had all been turned in by the 5:00 p.m. Eastern Time deadline on November 20, 2023. Exhibit F, LaCourse Decl. ¶ 6.

34. On information and belief, the municipalities to which the Campaign submitted did not certify any signatures of voters from other municipalities contained on the same petition forms.

35. On information and belief, thousands of signatures were systematically not certified for the reason stated in ¶ 34.

THE SECRETARY'S DECISION

36. On December 1, 2023, Respondent, through its agent Heidi M. Peckham, Director of Elections for the State of Maine, issued a letter to Petitioner entitled “Determination of the Validity of Candidate Filing for the 2024 Presidential Primary.” The determination letter is attached as Exhibit A.

37. Respondent’s determination letter rejected Petitioner’s primary petition to place Petitioner on the ballot for the 2024 Republic presidential primary because the petition “contained a total of 844² names certified by municipal registrars” and “this number is short of the 2,000 signatures required for the Secretary of State to accept the petition under 21-A M.R.S. §§ 335(5)(B-3) and 337(1).”

38. Pursuant to 21-A M.R.S. § 337(D), a candidate aggrieved by the ballot determination decision of the Secretary of State may appeal to this Court in accordance with M.R. Civ. P. 80C.

STANDARD OF REVIEW

39. Superior Courts review administrative action for any legal error. *Aroostook Home Care Agency, Inc. v. Comm’r of Human Servs.*, 552 A.2d 538, 542 (Me. 1988). “[T]he interpretation of constitutional and statutory provisions” by an appellate court reviewing the Secretary of State’s decision “are issues of law that [the appellate court] review[s] de novo.” *McGee v. Sec’y of State*, 896 A.2d 933, 936 (Me. 2006).

² Although the Maine Secretary of State’s December 1, 2023 notification letter rejecting the Campaign’s primary petition indicated that the petition contained 844 names certified by municipal registrars, their office later verbally confirmed to the Campaign that the accurate number is actually 842 signatures. Exhibit F, LaCourse Del. ¶ 7.

40. Pursuant to 5 M.R.S. § 11005, this Court's options include "affirmance, vacation, reversal or modification of the decision under review." *See also Town of Warren Ambulance Serv. v. Dep't of Pub. Safety*, 930 A.2d 1052, 1057 (Me. 2007) (noting that courts may "vacate" errant agency decisions).

41. Pursuant to 5 M.R.S. § 11007(4), this Court may remand for further proceedings, findings of fact, or conclusions of law, or direct the agency to take any action this Court deems necessary; or this Court may reverse the decision if the decision violated constitutional or statutory provisions, was made upon unlawful procedure, was affected by error of law, or was arbitrary or capricious.

**RESPONDENT'S DECISION WAS MADE UPON UNLAWFUL PROCEDURE IN
THE CITY OF AUGUSTA**

42. Petitioner incorporates all preceding paragraphs.

43. The City Clerk's office in Augusta operated upon the errant belief that their due date to certify signatures was December 5, not December 1. This was in contravention to the statute.

44. The Augusta City Clerk's office was admittedly short-staffed. The office's statutory error resulted in a late-night and rushed process with a high risk of error.

45. Michael Butterworth independently validated 646 signatures of voters registered in the City of Augusta timely submitted to the municipality, much higher than the 312 that the Augusta municipal office certified. Butterworth had internally validated 260 signatures for voters in Bangor, and the official Bangor certified signature count was significantly higher, at 307 signatures. It stands to reason that Augusta's numbers should have been higher, not lower, than 646 signatures. This is indicative that the rushed, short-staffed process in Augusta was rife with errors and cost many valid signatures rightful certification.

46. These errors on the part of the Augusta election officials concerning the statutory deadline and the rushed process amounted to unlawful procedure upon which Respondent made her decision regarding the ballot petition.

47. Respondent's decision should be vacated so that Augusta may certify all the signatures in an appropriate and complete manner.

**RESPONDENT'S DECISION IS AFFECTED BY ERROR OF LAW BECAUSE
PETITIONER COMPLIED WITH THE STATUTE**

48. Petitioner incorporates all preceding paragraphs.

49. The Petitioner complied with the requirements of the statute that "[p]etitions must be delivered to the registrar, or clerk at the request or upon the absence of the registrar, for certification by 5 p.m. on November 20th of the year prior to a presidential election year."

50. Similarly, Respondent's official guidance to candidates states that "a petition form signed by voters from multiple municipalities will not be invalidated on that basis." Exhibit B at 1.

51. Respondent's guidance merely suggests that separate petition forms should be used for each municipality for the purpose of convenience only. This guidance is reasonably understood to mean that municipalities are not prohibited from certifying signatures from other municipalities.

52. Petitioner did so. Petitioner gathered at least 5,558 signatures, many of which have been internally verified as valid and certifiable, and turned in at least 3,142 signatures to 21 municipal election officers by the statutory deadline of November 20, 2023, by 5:00 p.m.

53. To the extent that the Secretary reads the statutory requirements that "the registrar" referenced in 21-A M.R.S. § 442 must be the "respective" registrar, Respondent errantly adds words to the statute.

54. The statute does not place the burden of turning in the petitions to respective municipalities on the candidates. Rather, the statutes merely states that the petitions be delivered to “the registrar” by a date certain.

55. It is the responsibility of the municipal election officials, not the candidates, to certify the votes by municipality.

56. Therefore, Petitioner complied with the statute. The registrars should have communicated municipality-to-municipality to comply with their own respective responsibilities.

57. Respondent’s assumptions to the contrary were errors of law that affected its decision.

58. Under Respondent’s apparent view of the statute, candidates must deliver the same petition form to multiple municipalities within a compressed timeline entirely dependent on the certification speed of the municipalities, especially if the forms contain signatures from three or more municipalities. For municipalities such as the City of Augusta that waited until the deadline date of December 1 to certify, this is an impracticable interpretation of the statute.

59. The decision should be vacated because Petitioner complied with the best reading of the statutes.

RESPONDENT’S DECISION IS IN VIOLATION OF MAINE CONSTITUTIONAL DUE PROCESS

60. Petitioner incorporates all preceding paragraphs.

61. Individuals, including voters and candidates, have a right to procedural due process under Maine’s Constitution. *See All. for Retired Ams.*, 240 A.3d at 56–57; Maine Const. Art I. § 6-A.

62. In determining whether a Maine procedure violates due process by its risk of erroneous deprivation of an individual’s rights, Maine courts look to three factors: (1) the private

interest that will be affected by the official action; (2) the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards; and (3) the government's interest, including the function involved and administrative burdens that the additional or substitute procedural requirement would entail. *All. for Retired Ams.*, 240 A.3d at 56–57.

63. Petitioner has an individual right to seek access to the presidential primary ballot.

64. Petitioner's individual right has been affected by the official action, namely, by having Petitioner's petition rejected and not appearing on the 2024 Republican presidential primary ballot.

65. The statutory procedures for municipal certification of signatures carry an extremely high risk of erroneous deprivation, because they allow for a candidate who can show substantial support, such as over five-thousand voter signatures, to face deprivation of ballot access on the basis of a minor administrative procedural requirement, namely, that municipal registrars certify only the voters who reside in their respective municipalities, and not others.

66. Directing municipal election officials to certify both voters from their municipalities and others would be an extremely low burden upon those election officials because all municipal election officials have access to the CVR and could perform the certification with minimal additional administrative work.

67. Therefore, Respondent's decision to reject Petitioner's petition on the basis that the municipal registrars did not certify sufficient names should be vacated so that, consistent with due process, all names turned in within the statutory deadline should be counted.

**RESPONDENT'S DECISION IS IN VIOLATION OF PETITIONER'S FEDERAL
CONSTITUTIONAL DUE PROCESS RIGHTS**

68. Petitioner incorporates all preceding paragraphs.

69. “Restrictions on access to the ballot burden two distinct and fundamental rights.” *Illinois State Bd. Of Elections v. Socialist Workers Party*, 440 U.S. 173, 184 (1979). “To wit, ‘the right of individuals to associate for the advancement of political beliefs, and the right of qualified voters, regardless of their political persuasion, to cast their votes effectively. . . . Both of these rights, of course, rank among our most precious freedoms.’” *Knutson v. Dep’t of the Secy. Of State*, 2008 Me. Super. LEXIS 171, at *13 (citations omitted) (quoting *Anderson v. Celebrezze*, 460 U.S. 780, 787 (1983). “[T]o determine whether a ballot-access regulation governing the ‘mechanics of the electoral process,’ *McIntyre*, 514 U.S. at 345, violates the United States Constitution, a court ‘must first consider the character and magnitude of the asserted injury to the rights protected by the First and Fourteenth Amendments that the plaintiff seeks to vindicate. It then must identify and evaluate the precise interests put forward by the State as justifications for the burden imposed by its rule.’ *Anderson*, 460 U.S. at 789. The court must both ‘determine the legitimacy and strength of each of those interests’ and ‘consider the extent to which those interests make it necessary to burden the plaintiff’s rights.’” *Jones v. Sec’y of State*, 238 A.3d 982, 989 (Me. 2020).

70. Maine must use “[p]recision of regulation” when regulating ballot access. *Knutson*, 2008 Me. Super. LEXIS 171, at *14 (quoting *Anderson*, 460 U.S. at 806).

71. Petitioner has First and Fourteenth Amendment rights to associate for the advancement of political beliefs by accessing the presidential primary ballot in Maine.

72. To the extent that Respondent interprets the statute to require that each municipality only certify signatures of those who live within that municipality, that requirement is unnecessarily onerous upon Petitioner because it is expensive and inefficient for candidates and because there is no rationale for prohibiting municipalities from certifying voters from other municipalities.

73. Petitioner concedes that the State of Maine has interests in keeping candidates with no support off the ballot and in ensuring that the names of voters on petitions are valid.

74. Neither of those interests are rationally pursued by rejecting Petitioner's petition in this case.

75. Petitioner gathered and timely submitted well above the required threshold of signatures.

76. For the reasons stated above in ¶¶ 60–67, having one municipal registrar certify names but not a different registrar has no rational connection to the actual certification of names. Because any registrar can do so, the rule that only the respective registrars may do so is unconstitutional as applied.

RESPONDENT'S DECISION IS AFFECTED BY ERROR OF LAW OR ARBITRARY OR CAPRICIOUS IN LIGHT OF PETITIONER'S SUBSTANTIAL COMPLIANCE

77. Petitioner incorporates all preceding paragraphs.

78. The Supreme Court of Maine, as well as the office of the Respondent, have suggested that a "substantial compliance" standard may apply in the ballot access context. *See McGee*, 896 A.2d at 938 ("We are more convinced . . . that a substantial compliance standard is appropriate only when the provision at issue is directory rather than mandatory.").

79. The statutory scheme regulating presidential primary ballot access petitions provides no explicit mandatory prohibition against municipal election officials from certifying signatures from voters in other municipalities.

80. The statutory scheme is directory, directing municipal election officers to certify the voters in their respective municipalities but not mandating that they go no further. *See* 21-A M.R.S. § 335(7)(B); *see also* Exhibit B at 1 (noting municipality-specific petition gathering is "for

ease” and that “a petition form signed by voters from multiple municipalities will not be invalidated on that basis.”).

81. Petitioner turned in at least 3,142 signatures to the municipal election officers by the statutory deadline of November 20, 2023, by 5pm.

82. For the reasons stated above in ¶¶ 48–59, even if this Court does not find that Petitioner fully complied with the statutory scheme, Petitioner’s compliance was substantial.

83. Petitioner substantially complied with the requirements of the statute that “[p]etitions must be delivered to the registrar, or clerk at the request or upon the absence of the registrar, for certification by 5 p.m. on November 20th of the year prior to a presidential election year.” Petitioner did so.

84. Therefore, Respondent’s decision is affected by error of law or arbitrary or capricious in light of Petitioner’s substantial compliance with the statute.

RELIEF REQUESTED

WHEREFORE, Petitioner respectfully requests that this Honorable Court:

- A. Vacate the decision of Respondent;
- B. Remand and order Respondent to take the following actions promptly:
 1. Deliver all the petition sheets to the registrars of the municipalities;
 2. Issue guidance to the registrars of the municipalities to complete the certification process on all petition sheets by reviewing all signatures, including those rejected as out-of-municipality; and
 3. Upon receipt of the certified petitions, count the certified signatures in accordance with 21-A M.R.S. §§ 335, 337, and 442.

- C. Alternatively, vacate and remand with instructions that Augusta's municipal election officials perform a recertification process of all signatures received by November 20, 2023, by 5pm.
- D. Grant such other and further relief as the Court deems just and equitable.

Respectfully submitted this December 6, 2023.

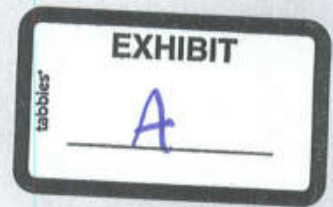
/s/ Fred W. Bopp III

Fred W. Bopp III, Esq., Maine Bar No. 6829

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Counsel for Petitioner

**STATE OF MAINE
OFFICE OF THE SECRETARY OF STATE**



Determination of the Validity of Candidate Filing for the 2024 Presidential Primary

Candidate: Chris Christie

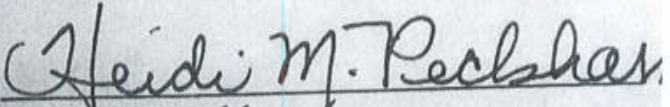
Today, December 1, 2023, you submitted to this Office a primary petition seeking to place Chris Christie on the ballot as a candidate for the 2024 Republican presidential primary. This letter is to notify you that I am rejecting this primary petition under 21-A M.R.S.A. § 337(1) because it does not contain the required number of certified names.

Under 21-A M.R.S. § 337(1), the Secretary of State may only accept a primary petition for filing if it "contains the required number of certified names and is properly completed." For a candidate for the office of President of the United States, the petition must contain signatures of a least 2,000 and not more than 2,500 voters.

The petition you submitted today contained a total of 844 names certified by municipal registrars. Even assuming the petition contained no other defects, this number is short of the 2,000 signatures required for the Secretary of State to accept the petition under 21-A M.R.S. §§ 335(5)(B-3) and 337(1). On behalf of the Secretary of State, I am rejecting the petition on this basis.

You may appeal this decision by commencing an action in the Superior Court pursuant to M.R. Civ. P. 80C and 21-A M.R.S. § 337(2)(D) within 5 days of the date of this decision.

Dated: December 1, 2023


Heidi M. Peckham
Director of Elections
State of Maine

State of Maine Candidate's Guide to Ballot Access for the March 5, 2024 Presidential Primary

Petitions are available from the Department of the Secretary of State, Division of Elections, located at the Burton M. Cross State Office Building, 4th floor, 111 Sewall Street, Augusta, Maine. You may pick up the petitions in person, have another person obtain them for you or have the petitions mailed to you.

Candidates seeking to participate in Maine's Presidential Primary must file a petition containing at least 2,000 and not more than 2,500 signatures from Maine registered voters enrolled in the party named in the petition. Candidates may begin circulating petitions as soon as the party for which they are running has filed the Party Certification of Presidential Primary Contest under 21-A MRS, §441(1). Signed petitions must be certified with the municipality before being presented to the Secretary of State. The deadline to file a petition for municipal certification is 5 p.m. on November 20, 2023. The deadline to file certified petitions with the Secretary of State is 5 p.m. on December 1, 2023.


Other Points Pertinent to Presidential Primary Petitions

- All markings on petition forms must be typed or printed in ink, except where an original signature is required.
- A separate petition form should be used for each municipality in which signatures are submitted. (This is for ease of municipal verification of voters; a petition form signed by voters from multiple municipalities will not be invalidated on that basis.)
- The **circulator** of a petition does not have to be a Maine resident or Maine registered voter. The circulator must personally witness every signature that is made to the petition and be able to take an oath to that effect.
- A voter may sign petitions for more than one candidate. However, a voter may sign each candidate's petition only once.
- To ensure that the registrar will be able to certify a voter's signature, the voter should sign a petition in the same manner as appears on the voter's voter registration card. However, immaterial irregularities will not invalidate a signature as long as the registrar can determine that the signer is the voter on the municipality's list. Immaterial irregularities include, but are not limited to, misspelling, inclusion or omission of initials and substitution of initials or nicknames for given names.

Primary (Party) Petition Filing Checklist

- Collect at least 2,000 signatures. Signers must be Maine registered voters and enrolled in the party named in the petition.
- Have each petition verified by its circulator – the "Circulator's Oath" must be completed on each petition – see page 3 for further details.
- Have all signatures certified by the applicable registrar of voters prior to filing with the Secretary of State – see page 4 for further details.
- Sign the "Candidate's Consent" section of the *Presidential Primary Candidate's Consent* form before a Notary Public or other person authorized by law to administer oaths or affirmations – see page 4 for further details.
- Present the petitions and the completed *Presidential Primary Candidate's Consent* form to the Secretary of State for review on or before **5 p.m., December 1, 2023.**

Sample of Presidential Primary Petition

	STATE OF MAINE Presidential Primary Petition March 5, 2024	DATE FILED With Secretary of State
① _____ Party		
Legal name of candidate as it will appear on the ballot: (See Title 21-A, §601(2)(H) for requirements.)		
② _____ (Last name and suffix, if any)	_____ (First name)	_____ (Middle name or initial)
Voting Residence Address of Candidate ③ _____ (City/Town)		_____ (State)
Mailing Address of Candidate (if different from above): _____ ④ _____		
<p><i>Petition must be submitted to municipal registrar for certification prior to filing with Secretary of State.</i> <i>Deadline for submitting petitions to municipal registrar for certification: 5 p.m., November 20, 2023</i> <i>Deadline for filing petitions and Candidate's Consent with Secretary of State: 5 p.m., December 1, 2023</i></p> <ul style="list-style-type: none">• Every voter must sign the petition in the circulator's presence.• Registered voters <u>physically unable to sign</u>, who have filed an alternative signature statement per 21-A MRS §153-A, may direct another Maine registered voter to sign the petition in their presence. The authorized individual must sign their name, the assisted voter's name, attest to signing on the voter's behalf, and complete all information on both lines (for the voter and the assistant).• For more information, please contact the Division of Elections at (207) 624-7650.		

Completing Presidential Primary Petitions

Instructions for Candidate Information Section

1. Write the name of the qualified party in which the candidate is enrolled.
2. Write the candidate's legal name on the petition in one of the following forms:
 - a. last name (and suffix, if any), first name, middle name
 - b. last name (and suffix, if any), first name, middle initial
 - c. last name (and suffix, if any), first initial, middle name
 - d. last name (and suffix, if any), first name

The name should be completed as it will appear on the ballot and must be in one of the forms listed above, as required by 21-A MRS §601(2)(H). The candidate must also sign the Candidate's Consent in the same manner. A candidate's name listed on the ballot must be the candidate's legal name.

See 21-A MRS §601(2)(B-1).

3. Write the residence address (town or city and state) where the candidate is registered to vote.
4. Write the mailing address of the candidate, if different.

Note: The information required on the petition must be completed prior to circulation. A petition may be rejected if it is missing required information when filed with the Secretary of State.

Instructions for Collection of Signatures

For Registrar use only	SIGNATURE OF VOTER (Not Printed Name)	PRINTED NAME OF VOTER	DATE SIGNED	ACTUAL STREET ADDRESS (Not P.O. Box)	MUNICIPALITY (Where Registered)
1.					
2.					
3.					

1. The petition may be signed only by voters who are registered voters in the State of Maine and who are enrolled in the party named in the petition. The voter must sign his or her name personally, except that a voter who is physically unable to sign the petition and who is registered to vote as provided in 21-A MRS §153-A(3), may direct another Maine registered voter to sign the petition in the voter's presence. The individual assisting the voter who is physically unable to sign, must sign the voter's name on one line and then sign the individual's own name on another line and attest that the individual is signing on the voter's behalf. The assistant must complete the rest of the information on both lines (for the voter and the assistant).
2. The printed name of the voter, the date signed, the street address and the municipality may be completed by either the voter or the circulator. Ditto marks are permitted only for street address and municipality of registration.

Instructions for the Circulator's Oath

Circulator's Oath

I hereby make oath that I am the Circulator of this petition; that I personally witnessed all of the signatures to this petition; and, to the best of my knowledge and belief, each signature is that of the person whose name it purports to be, and each person is enrolled in the party named on this petition, and is a resident of the electoral division named in the petition. If any voter was unable to sign due to a physical disability, I hereby verify, that the voter authorized another voter to sign at the voter's direction and in the voter's presence.

Signature of Circulator _____ Printed Name of Circulator _____

Signature of Notary _____ Printed Name of Notary _____

Subscribed to and sworn before me on this date: _____ Date my Notary Commission expires: _____
(Date must be completed by Notary)

Circulator's Oath: After the circulator has gathered all of the signatures on a particular petition form, the circulator must take an oath before a notary public or other person authorized by law to administer oaths or affirmations that:

- The circulator **personally witnessed** all of the signatures to the petition;
- To the best of the circulator's knowledge and belief, each signature is that of the person whose name it purports to be;
- Each signer is a registered voter of the electoral district named on the petition and enrolled in the party designated on the petition; and
- If a voter was unable to sign due to a physical disability, that the voter authorized another voter to sign at the voter's direction and in the voter's presence.

The circulator must take the oath for each petition form circulated. **Once the circulator has taken the oath before a notary, no signatures may be added to that petition form.**

Instructions for the Registrar's Certification

Registrar's Certification

Municipality _____ TOTAL VALID _____ TOTAL INVALID _____

I hereby certify that the names of all the petitioners listed as valid appear on the voting list as registered voters in this municipality, in the electoral division named in the petition, and are enrolled in the party named on this petition.

DATE & TIME PETITION RECEIVED:

Signature of Registrar: _____

Date petition certified: _____

Registrar's Certification: The registrar of voters or municipal clerk must certify that each person whose signature appears on the petition is registered to vote in that municipality, and is enrolled in the party designated on the petition.

Instructions for the Candidate's Consent

State of Maine
Presidential Primary Candidate's Consent

_____ Party

Legal name of candidate as it will appear on the ballot: *(See Title 21-A, §601(2)(D) for requirements for listing candidates' names on the ballot.)*

(Last name and middle, if any) _____
(First name) _____
(Middle name or initial)

Phonetic pronunciation of name for accessible audio ballot _____

Voting Residence Address of Candidate: _____
(City/Town) _____
(State)

Qualifications of President of the United States (U.S. Constitution, Article II, Section 1)

- Be a natural born U.S. Citizen
- Have been a resident of the United States for at least 14 years
- Be at least 35 years of age

Candidate's Consent

I hereby declare my intent to be a candidate for the Office of President of the United States and participate in the Presidential Primary for the party named above to be held on March 5, 2024, in the State of Maine. I further declare that my residence is in the municipality and state listed above; that I am enrolled in the party named on this consent; that I meet the qualifications to hold this office as listed above; and that this declaration is true.

(Signature of Candidate)

Subscribed to and sworn before me on this date: _____
(Date) _____
(Signature of Notary Public)

(Printed Name of Notary Public)

Filing deadline for Candidate's Consent and Presidential Primary Nomination petitions to be received by the Division of Elections is 5 p.m., Friday, December 1, 2023.

The candidate must sign the *Presidential Primary Candidate's Consent* form and take an oath before a notary public or other person authorized by law to administer oaths or affirmations. The Candidate's Consent form contains a statement declaring intent to be a candidate for the Office of President and participate in the Maine Presidential Primary, a declaration of the candidate's voting residence and party designation, and a statement that the candidate meets the qualifications to hold the office.



State of Maine
Presidential Primary Petition
March 5, 2024

DATE FILED
With Secretary of State

Party

Legal name of candidate as it will appear on the ballot: (See Title 21-A, §601(2)(H) for requirements.)

(Last name and suffix, if any) (First name) (Middle name or initial)

Voting Residence Address of Candidate: (City/Town) (State)

Mailing Address of Candidate:

Petition must be submitted to municipal registrar for certification prior to filing with Secretary of State.
Deadline for submitting petitions to municipal registrar for certification: 5 p.m., November 20, 2023
Deadline for filing petitions and Candidate's Consent with Secretary of State: 5 p.m., December 1, 2023

- Every voter must sign the petition in the circulator's presence.
• Registered voters physically unable to sign, who have filed an alternative signature statement per 21-A MRS §153-A, may direct another Maine registered voter to sign the petition in their presence.
• For more information, please contact the Division of Elections at (207) 624-7650.

Table with 6 columns: For Registrar use only, Signature of Voter (Not Printed Name), Printed Name of Voter (Not Signature), Date Signed, Actual Street Address (Not P.O. Box), Municipality (Where Registered). Rows 1-20.

For Registrar use only	Signature of Voter (Not Printed Name)	Printed Name of Voter (Not Signature)	Date Signed	Actual Street Address (Not P.O. Box)	Municipality (Where Registered)
21.					
22.					
23.					
24.					
25.					
26.					
27.					
28.					
29.					
30.					
31.					
32.					
33.					
34.					
35.					
36.					
37.					
38.					
39.					
40.					

Circulator's Oath

I hereby make oath that I am the Circulator of this petition; that I personally witnessed all of the signatures to this petition; and, to the best of my knowledge and belief, each signature is that of the person whose name it purports to be, and each person is enrolled in the party named on this petition, and is a resident of the electoral division named in the petition. If any voter was unable to sign due to a physical disability, I hereby verify, that the voter authorized another voter to sign at the voter's direction and in the voter's presence.

Signature of Circulator _____ Printed Name of Circulator _____

Signature of Notary _____ Printed Name of Notary _____

Subscribed to and sworn before me on this date: _____ Date my Notary Commission expires: _____
(Date must be completed by Notary)

Registrar's Certification

Municipality _____ TOTAL VALID _____ TOTAL INVALID _____

I hereby certify that the names of all the petitioners listed as valid appear on the voting list as registered voters in this municipality, in the electoral division named in the petition, and are enrolled in the party named on this petition.

DATE & TIME PETITION RECEIVED:

Signature of Registrar: _____

Date petition certified: _____

The candidate must also file the *State of Maine Presidential Primary Candidate's Consent* for the March 5, 2024 Presidential Primary Election by 5 p.m. on December 1, 2023.



**STATE OF MAINE
KENNEBEC, ss.**

**SUPERIOR COURT
CIVIL ACTION
DOCKET NO. _____**

CHRISTOPHER CHRISTIE,

Petitioner

v.

**SHENNA BELLOWS, in her official
capacity as the Maine Secretary of State,**

Respondent.

DECLARATION OF JORDAN BROWNSTEIN

I, Jordan Brownstein, do hereby declare under the penalty of perjury that the following is true and correct:

1. My name is Jordan Brownstein, and I am above the age of 18 and I am otherwise competent to testify.
2. I make the statements below based on my personal knowledge, information, and belief.
3. I am President at The Human Connection, LLC. Since founding this company in 2018, I have had the opportunity to work with numerous campaigns to assist with ballot access drives across the country and to process millions of petition signatures. My team and I specialize in qualifying candidates and initiatives for the ballot in elections nationwide.
4. My company was contracted by Qualify Candidates, a petition circulating firm, to operate as the ground manager for Chris Christie for President, Inc.'s signature gathering efforts to qualify for the 2024 Republican Party presidential primary ballot in

Maine. In this capacity, my team was tasked with collecting petition signatures from Maine registered voters enrolled in the Republican Party by the November 20, 2023 deadline to file petitions for municipal certification. We executed a plan to gather at least 4,000 signatures to ensure that the requisite threshold of 2,000 verified signatures would be satisfied.

5. In conducting our petition circulating operations, we frequently referenced the guidance issued by the Maine Department of the Secretary of State, titled the "State of Maine Candidate's Guide to Ballot Access for the March 5, 2024 Presidential Primary" ("Secretary's Guidance"). Although the Secretary's Guidance indicates that separate petition forms "should" be used for each municipality in which signatures are submitted "for ease of municipal verification of voters," it also indicates that "a petition form signed by voters from multiple municipalities will not be invalidated on that basis."

6. Relying on the Secretary's Guidance, we did our best to separate signatures by municipality, but also determined that it would be acceptable to submit petition forms signed by voters from multiple municipalities and that valid signatures would still be counted on such submissions. As the Secretary's Guidance made clear, using separate petition forms for each municipality was primarily an issue of administrative "ease" of verification, rather than a procedural requirement for validation. Accordingly, notwithstanding our efforts to keep signatures separated by municipality, many of our submitted petition forms ultimately included voters' signatures from multiple municipalities.

7. In doing so, we also relied on the fact that Maine's petition form itself was

designed to accommodate the collection of signatures from multiple municipalities. Instead of designing a form with the municipality name occurring once on the top of the form, Maine's form includes a "municipality" column on the right side that allows for each voter to write their own unique municipality of registration.

8. In conjunction with Qualify Candidates, we collected an estimated total of at least 5,558 signatures for the Campaign, and submitted approximately that same number of signatures to 22 different Maine municipal registrars on November 20, 2023.¹

9. Based on my company's robust internal audit and validation system and my experience validating petitions in numerous past elections, I can confidently state that more than 2,000 of the signatures the Campaign submitted to the Maine municipalities on November 20, 2023 (and subsequently filed with the Secretary of State on December 1, 2023) are valid. Put another way, if the signatures had been centrally validated using Maine's Central Voter Registration system under ordinary review protocols, at least 2,000 total signatures would have almost certainly been certified for the Campaign.

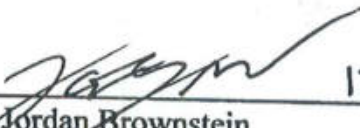
10. Furthermore, based on the significant disparity between the number of signatures that the municipalities certified and the number of signatures validated via my company's internal validation process, it is evident to me that many valid signatures were thrown out because of a procedural technicality: they originated from different

¹ My records indicate that we submitted approximately 221 remaining signatures to Winslow, Maine at 5:58 p.m. on November 20, 2023, after the 5 p.m. deadline. These included signatures from Winslow as well as several other small municipalities. We filed all other signatures with the other 21 municipalities before the 5:00 p.m. deadline that day.

municipalities.

11. Nothing in the Secretary's Guidance indicated to me or to Qualify Candidates that submitting petition forms with voters' signatures from multiple municipalities would result in invalidation of such signatures on that basis.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 6th day of December, 2023.


12-6-23.
By: Jordan Brownstein
President, The Human Connection, LLC

STATE OF MAINE
KENNEBEC, ss.

SUPERIOR COURT
CIVIL ACTION
DOCKET NO. _____



CHRISTOPHER CHRISTIE,

Petitioner

v.

**SHENNA BELLOWS, in her official
capacity as the Maine Secretary of State,**

Respondent.

DECLARATION OF MICHAEL BUTTERWORTH

I, Michael Butterworth, do hereby declare under the penalty of perjury that the following is true and correct:


1. My name is Michael Butterworth, and I am above the age of 18 and I am otherwise competent to testify.
2. I make the statements below based on my personal knowledge, information, and belief.
3. I am a manager of Campaign Depot, LLC, which is a campaign services company. I contracted with Qualify Candidates to perform work for Chris Christie's 2024 presidential campaign ("Campaign") in Maine.
4. Using software the company developed to provide tools to campaigns and municipalities to more effectively search for registered voters using names and addresses, Campaign Depot assisted Qualify Candidates by conducting independent internal verification of many signatures collected by canvassers and turned in to us before they were filed with numerous Maine municipalities on or about November 20, 2023. Campaign

Depot assisted Qualify Candidates with internal verification procedures by using voter registration lists to determine if the information provided by individuals signing petitions matches the database records of voters registered with the Republican Party of Maine.

5. For instance, through this process our team was able to independently validate 646 signatures of registered voters from the City of Augusta, Maine that Qualify Candidates uploaded for review in our system. I was surprised to subsequently learn that the Augusta City Clerk only validated 312 signatures even though we had independently validated more than double that amount from the batch of signatures we reviewed.

6. This disparity is particularly surprising when contrasted with the City of Bangor, where we internally verified 260 signatures, which was much closer to the 307 signatures subsequently certified by the City Clerk of the City of Bangor. Because Qualify Candidates informed me that a sizeable number of signatures collected and submitted near the deadline would not have time to go through my internal verification process, I had expected the number of municipally-verified signatures to be higher than my number, as in the case of Bangor, rather than significantly lower like was seen in Augusta.

7. Based on my experience validating petition signatures across numerous states including Maine, these numbers suggest that the City of Augusta failed to validate a sizeable number of what should have been valid signatures.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 6th day of December, 2023. 

By: Michael Butterworth
Manager, Campaign Depot, LLC



STATE OF MAINE
KENNEBEC, ss.

SUPERIOR COURT
CIVIL ACTION
DOCKET NO. _____

CHRISTOPHER CHRISTIE,

Petitioner

v.

**SHENNA BELLOWS, in her official
capacity as the Maine Secretary of State,**

Respondent.

DECLARATION OF JEFFREY LACOURSE

I, Jeffrey LaCourse, do hereby declare under the penalty of perjury that the following is true and correct:

1. My name is Jeffrey LaCourse, and I am above the age of 18 and I am otherwise competent to testify.
2. I make the statements below based on my personal knowledge, information, and belief.
3. I am the New Hampshire State Director for Governor Chris Christie's 2024 Presidential Campaign's (the "Campaign") Operations in New Hampshire. In mid-November, Deputy Campaign Manager Collin Cummings asked me to oversee the collection of petition forms that were filed with various Maine municipalities for verification and to deliver those forms to the Secretary of State's office by the December 1, 2023 deadline.
4. Accordingly, in coordination with the Campaign's counsel Andrew Watkins, as each municipality communicated that the petition forms had been certified, I traveled to

collect those forms from each of those municipalities for delivery to the Secretary of State.

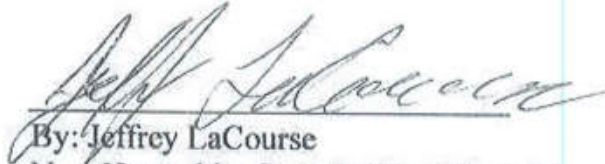
5. While smaller municipalities were often quick to certify their petition forms, the municipality with the largest number of the Campaign's signatures, the City of Augusta, was particularly delayed in its processing and review of the petition forms due to their office's staffing issues and confusion about the statutory deadline for certification. After counsel's fruitless attempts to obtain the Augusta City Clerk's estimate on the timetable for completing review of these signatures, and following some communication from the Secretary's office, the City Clerk's office finally finished its validation of signatures on December 1, 2023, the deadline for submission to the Secretary of State.

6. I maintained an internal tally of the number of total signatures that were on the petition forms that I collected from each of the municipalities as they were certified, and provided those numbers to Andrew Watkins as they were tallied. Based on that tally and numbers provided to me by the Augusta City Clerk's office, there were at least 3,142 signatures collected from the municipalities after the initial certification process.

7. Because the municipalities to which we submitted petition forms only validated a total of 842 of those signatures, the Secretary of State rejected Governor Christie's primary petition. Although the Secretary's determination letter had indicated that the petition contained a total of "844 names" certified by municipal registrars, their office subsequently verbally confirmed to me that the accurate number was 842 names.

8. Upon examining the certified signatures, it is apparent that a large number of signatures were not counted simply because the municipalities would not certify signatures from other municipalities.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this
6th day of December, 2023.

A handwritten signature in black ink, appearing to read "Jeffrey LaCourse", written over a horizontal line.

By: Jeffrey LaCourse
New Hampshire State Political Director
Chris Christie for President, Inc.



STATE OF MAINE
KENNEBEC, ss.

SUPERIOR COURT
CIVIL ACTION
DOCKET NO. _____

CHRISTOPHER CHRISTIE,

Petitioner,

v.

SHENNA BELLOWS, in her official
capacity as the Maine Secretary of State,

Respondent.

DECLARATION OF ANDREW D. WATKINS

I, Andrew D. Watkins, do hereby declare under the penalty of perjury that the following is true and correct:

1. My name is Andrew D. Watkins, and I am above the age of 18, and I am otherwise competent to testify.
2. I make the statements below based on my personal knowledge, information, and belief.
3. I am an attorney licensed to practice in the Commonwealths of Virginia and Kentucky and in the District of Columbia. I am employed at the law firm of Holtzman Vogel Baran Torchinsky & Josefiak PLLC, and my residence and office are in the Commonwealth of Virginia.
4. Governor Chris Christie's 2024 Presidential Campaign (the "Campaign") retained Holtzman Vogel to provide legal advice and representation during the Republican Party presidential primary elections. As counsel to the Campaign, I have advised the

Campaign throughout the course of this campaign cycle regarding, *inter alia*, ballot access requirements, campaign finance, and other related issues.

5. The Campaign hired Qualify Candidates to collect petition signatures from qualified Republican voters to satisfy the qualification requirements for the 2024 Maine Republican Party presidential primary ballot. Qualify Candidates in turn contracted with The Human Connection LLC and Campaign Depot LLC to manage ground operations.

6. Between the time that the Campaign filed its petition forms with 22 Maine municipal registrars on November 20, 2023 and the December 1, 2023 deadline to file certified petitions with the Maine Department of the Secretary of State, I spoke with several of these municipal Clerks' offices regarding the validation of petitions that were dropped off on November 20, 2023. In my communications with the City of Augusta, the largest municipality that the Campaign submitted signatures to, I learned that it was short-staffed and backed up in its review of signatures submitted. I subsequently learned, from conversations with the Secretary of State's Office that Augusta was also confused about the December 1st deadline.

7. Specifically, after the petition forms were delivered to the City of Augusta on November 20, 2023, I received a phone call from the City Clerk, Kelly Gooldrup. During that call, I asked when her office would be able to complete the signature validation process. She responded that because her office was short-staffed and its workload was backed up, verification would take some time to complete, but that her office would finish "by the deadline." Ms. Gooldrup estimated that "fewer than 50" of the approximately 390 submitted petition sheets lacked an Augusta signature on them. She also confirmed that her

office would verify all Augusta signatures even if they were found on forms with signatures from multiple municipalities.

8. On November 29, 2023, I called the City Clerk's office and spoke with a female employee there, who indicated she had no update regarding when signature validation of the Campaign's petitions would be completed, but that she would call me when their office had an update. She requested that I not call her office again.

9. On November 29, 2023, I also called the Secretary of State's Office and spoke with Heidi Peckham, Director of Elections, to schedule an appointment for the Campaign to drop off petition signatures with that Office on December 1, 2023 at 11:00 a.m.

10. On November 30, 2023, after receiving no call and with the deadline approaching, I again called the Augusta City Clerk's office to ask for an update on timing of signature validation and whether the Campaign should re-schedule its appointment with the Secretary of State's office that had been scheduled for December 1, 2023 at 11:00 a.m. to submit the petitions. The same female employee I spoke with on November 29, 2023 said that I had just called yesterday and she had told me that they would call me when complete and to not call again, and that the Campaign "probably should" reschedule the appointment with the Secretary of State's Office. I asked if that meant that their office's review of the petitions would not be finished on November 30; she responded "no," and then abruptly hung up the phone.

11. I immediately called the Augusta City Clerk's Office back and left a voicemail for Ms. Gooldrup, the City Clerk asking that she return my call to speak about

the issue.

12. Later that same day, my law firm's managing partner Jill Vogel and I called Deputy Secretary of State Julie Flynn to explain the difficulties we had experienced working with the Augusta City Clerk's office and what we needed to do to ensure that the Campaign could meet the December 1st deadline. Ms. Flynn indicated that her office would inquire further and get back to us with an answer.

13. Later that day, Director of Elections Heidi Peckham called us back and informed us that the Secretary's office had spoken with the Augusta City Clerk and learned that the Clerk's office was under the mistaken impression that the signature validation deadline was December 5, 2023. When the Secretary's office informed the City Clerk's office that it was mistaken and that the deadline was actually December 1st, the City Clerk's office confirmed that it would work overtime and after hours to ensure that the signatures were validated by the next morning on December 1st. Accordingly, we rescheduled the Campaign's appointment with the Secretary's office to 3:00 p.m. to allow Augusta time to finalize its petition verification.

14. On December 1, 2023, the Campaign learned that the City Clerk had only validated 312 signatures, a small fraction of the signatures that the Campaign had filed. I was particularly surprised by this low number of validated signatures because Qualify Candidates had been able to internally validate 646 Augusta signatures on its own.

15. It is my understanding that at least 3,142 signatures were collected from the

municipal Clerk's Offices; of those, only 842 total signatures were certified.¹

16. Regarding petition forms containing signatures from multiple municipalities, Ms. Peckham of the Secretary of State's office told me that the municipalities of Augusta, Lewiston, and Winslow had all contacted the Secretary's office and reported that the Campaign had filed a large quantity of out-of-municipal signatures.

17. On December 1, 2023, the Campaign received a notification letter from the Secretary of State's office indicating that the Secretary was rejecting the Campaign's primary petition because it does not contain the required 2,000 certified names, and that it may appeal that decision by commencing an action in Superior Court within 5 days of the date of that decision.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 6th day of December, 2023.



By: Andrew D. Watkins
Counsel for Chris Christie for President, Inc.
Holtzman Vogel Baran Torchinsky & Josefiak PLLC

¹ Although the Maine Secretary of State's December 1, 2023 notification letter rejecting the Campaign's primary petition indicated that the petition contained 844 names certified by municipal registrars, their office later verbally confirmed to the Campaign that the accurate number is actually 842 signatures.