

April 16, 2024

Georgia State Election Board
2 MLK Jr. Drive
Suite 802 Floyd West Tower
Atlanta, GA 30334

Re: Petition for Promulgation of Election Rule

Chairman Fervier and Honorable Members of the State Election Board,

United to Protect Democracy submits the following petition pursuant to the requirements of Rule 183-1-1-.01. We have also provided copies to the Board via email to provide the Board access to the information contained in the included hyperlinks.

This petition is being submitted to the State Election Board to aid Georgia's election officials in adjudicating voter challenges during this and future elections. The following is the full text of the rule requested to be amended, repealed, or promulgated as required by Georgia law.

If any member of the Board has any questions or concerns, please contact Peter Simmons at Peter.Simmons@ProtectDemocracy.org or 202-768-2215.

Requirements to Petition for Adoption of Rules

Name and post office address of the petitioner.

United to Protect Democracy
2020 Pennsylvania Avenue, NW
#163
Washington, DC 20006

Full text of the rule requested to be amended or repealed, or the full text of the rule desired to be promulgated.

Create a new Rule 183-1-6-.07 to read as follows:

"Rule 183-1-6-.07 Challenges to qualifications of a person registering to vote and electors.

(1) In order to implement the provisions of Georgia Code § 21-2-229, the State Election Board promulgates the following rules and regulations.

(2) Challenges made pursuant to Georgia Code § 21-2-229 shall only be filed by an eligible elector in the same county or municipality where the elector being challenged is applying to register to vote or appears on the list of electors. The County Board of Registrars shall determine whether a challenge has been filed by an eligible elector by

- (a) following the appropriate procedures to verify their residence pursuant to Georgia Code § 21-2-217;
 - (b) considering the totality of the circumstances under which the challenge was submitted; and
 - (c) obtaining other reasonable information from the elector filing the challenge to ensure compliance with relevant Georgia law.
- (3) County Boards of Registrars shall immediately dismiss challenges they have determined to be filed by anyone other than an eligible elector.
- (4) Challenges made pursuant to Georgia Code § 21-2-229 shall be made in writing and specify distinctly the grounds of the challenge. For the grounds of a challenge to be specified in a sufficiently distinct manner, they must include statements of fact and law that
 - (a) demonstrate that the challenge was made on an individualized basis, was not filed as a part of a systematic inquiry, and that the challenger possesses personal knowledge of the circumstances that prove the challenged voter's ineligibility;
 - (b) demonstrate the existence of such facts and circumstances, supported by reliable documentary evidence from reputable, identifiable, verifiable sources, that create a reasonable belief that the challenged voter is ineligible to register or remain on the voter rolls in the relevant county or municipality;
 - (c) demonstrate that the challenger used reasonable, sufficiently rigorous methods in good faith while gathering and analyzing facts to support the challenge; and
- (5) A challenge filed pursuant to Georgia Code § 21-2-229 may be considered part of a systematic inquiry if
 - (a) the challenger did not rely upon individualized information or investigation to determine which elector, or electors, to file the challenge against;
 - (b) the challenger relied on a mass data-matching process to compare the voter rolls with other state and federal databases; or
 - (c) the totality of the circumstances reasonably indicates that the challenge was filed as part of a systematic inquiry.
- (6) If the grounds of the challenge are not specified in a sufficiently distinct manner, the County Board of Registrars shall dismiss the challenge, and no further action is required.
- (7) Electors filing challenges to voter qualifications pursuant to Georgia Code § 21-2-229 bear the burden of proving with clear and convincing evidence that the challenged voter is ineligible to remain on the voter rolls. Electors making such challenges must meet this burden by
 - (a) Identifying and producing witnesses who can demonstrate personal knowledge of the circumstances proving the challenged voter's ineligibility;
 - (b) Identifying and producing evidence such as books, papers, and other materials that provide sufficient evidence to prove the challenged voter's ineligibility; and
 - (c) Providing clear and convincing evidence of the voter's ineligibility.
 - (i) Evidence shall be considered clear, convincing, and decisive if it causes the County Board of Elections to believe, with reasonable certainty, each element of a challenger's claim to a high degree of probability.
 - (ii) This degree of probability far exceeds the requirements for a preponderance of the evidence that demonstrates that it is more likely than not that the violation alleged in the challenge has occurred."

Create a new Rule 183-1-6-.08 to read as follows:

“Rule 183-1-6-.08 Challenges to the Right to Vote.

(1) In order to implement the provisions of Georgia Code § 21-2-230, the State Election Board promulgates the following rules and regulations.

(2) Challenges made pursuant to Georgia Code § 21-2-230 shall only be filed by an eligible elector in the same county or municipality where the elector being challenged is applying to register to vote or appears on the list of electors. The County Board of Registrars shall determine whether a challenge has been filed by an eligible elector by

(a) following the appropriate procedures to verify eligibility pursuant to Georgia Code § 21-2-217;

(b) considering the totality of the circumstances under which the challenge was submitted; and

(c) obtaining other reasonable information from the elector filing the challenge to ensure compliance with relevant Georgia law.

(3) County Boards of Registrars shall immediately dismiss challenges they have determined to be filed by anyone other than an eligible elector.

(4) Challenges made pursuant to Georgia Code § 21-2-230 shall be made in writing and specify distinctly the grounds of the challenge. For the grounds of a challenge to be specified in a sufficiently distinct manner, they must include statements of fact and law that

(a) demonstrate that the challenge was made on an individualized basis, was not filed as a part of a systematic inquiry, and that the challenger possesses personal knowledge of the circumstances that prove the challenged voter’s ineligibility;

(b) demonstrate the existence of such facts and circumstances, supported by reliable documentary evidence from reputable, identifiable, verifiable sources, that create a reasonable belief that the challenged voter is ineligible to register or remain on the voter rolls in the relevant county or municipality;

(c) demonstrate that the challenger used reasonable, sufficiently rigorous methods in good faith while gathering and analyzing facts to support the challenge; and

(5) A challenge filed pursuant to Georgia Code § 21-2-230 may be considered part of a systematic inquiry if

(a) the challenger did not rely upon individualized information or investigation to determine which elector, or electors, to file the challenge against;

(b) the challenger relied on a mass data-matching process to compare the voter rolls with other state and federal databases; or

(c) the totality of the circumstances reasonably indicates that the challenge was filed as part of a systematic inquiry.

(6) If the grounds of the challenge are not specified in a sufficiently distinct manner, the County Board of Registrars shall dismiss the challenge, and no further action is required.

(7) Challenges filed pursuant to Georgia Code § 21-2-230 shall be filed before a voter votes absentee in person or in person on or before election day, or the County Board of Registrars shall dismiss the challenge, and no further action is required.

(8) Challenges filed pursuant to Georgia Code § 21-2-230 against a voter who votes absentee by mail shall be filed by 5:00 PM on the day before absentee ballots are scanned and tabulated, or the County Board of Registrars shall dismiss the challenge, and no further action is required.

(9) Challenges made pursuant to Georgia Code § 21-2-230 must provide sufficient evidence to substantiate probable cause.

- (a) Probable cause for challenges filed pursuant to Georgia Code § 21-2-230 shall be defined as the existence of such facts and circumstances that would create a reasonable belief that the challenged voter is ineligible.
 - (b) Rumor, suspicion, speculation, or conjecture shall be insufficient to show probable cause.
 - (c) Probable shall not exist when the circumstances indicate that the accuser had no reasonable ground for initiating the challenge.
- (10) The County Board of Elections shall determine immediately upon receipt whether a challenge sufficiently alleges probable cause and dismiss any challenge where probable cause does not exist.

Reason(s) such rule should be amended, repealed, or promulgated.

Purpose of the Rule

The proposed rules clarify language in Georgia Code § 21-2-229 and § 21-2-230 and provide clear guidelines for county election officials to evaluate the grounds of a challenge under these statutes, determine whether voter challenges successfully allege probable cause, and ensure that the burden of proof is allocated appropriately according to Georgia law.

As the 2024 General Election approaches, additional challenges are highly probable, especially considering the technology developed by some interest groups to make these challenges easier to file. By promulgating these rules as soon as possible, the Board can help counties navigate these complicated statutes with increased clarity and efficiency and alleviate administrative burdens that hamper their ability to administer elections effectively.

The Reason the Rule is Necessary

In recent years, organizations nationwide have recruited, trained, and organized volunteers to challenge voters' eligibility to appear on voter rolls and participate in the political process across the country. In Georgia, these efforts began in earnest after the 2020 general election when candidates running for Georgia's U.S. Senate seats failed to achieve a majority in either election, necessitating a runoff to determine partisan control of the United States Senate.

During this time, volunteers challenged hundreds of thousands of voters under Georgia's voter challenge statutes. These challenges have been made en masse and largely without sufficient information, causing confusion among voters and election officials and placing a greater burden on Georgia's election administration infrastructure.

Expert testimony deemed reliable by a federal district court¹ recently discussed how hundreds of thousands of challenges in this state have been developed. The expert determined that it appeared that challengers had attempted to match registrants from the voter file to National Change of Address (NCOA) data. This process, known as "record linkage," is

¹*Fair Fight Inc., et al., v. True The Vote, Inc., et al.*, 2022 WL 20508366 (N.D.Ga.).

“extremely difficult” and “error-prone” when individuals don’t have a unique identifier across databases, as is often the case with the challenge lists in question.²

According to this expert, this method produced more than 85,000 duplicates, ensuring that errors would occur, and as far as the expert could tell, the challengers also failed to perform adequate checks to ensure the quality of their results and follow standard practices and conducted their analysis with “huge numbers of missing values.”³ This expert also concluded that even if the data was not error-ridden, determining that a voter has moved is insufficient to determine eligibility, especially considering that almost 23,000 people on the challenge file appeared to have moved to an address near or on a military base and more than 34,000 people on the challenge file appeared to move near a college or university.⁴

In the findings of fact included in the Court’s opinion, Judge Steve Jones, despite ruling in favor of the defendants, remarked that the list of challenged voters “utterly lacked reliability” and “verges on recklessness,” citing the lack of quality control and expertise in this process. Judge Jones went on to say that a visual inspection would have concerned a reasonable reviewer and emphasized that the size of the list raised concerns that the effort would be characterized as systemic.⁵

The court also noted that the challenges continued in this manner after a credible former Secretary of State employee warned them that they were intended to be made on an individualized basis and that the NCOA data used as the foundation of the challenges, without individualized evidence, was insufficient to substantiate them⁶ and highlighted the fact that once a challenger was identified, groups organizing volunteers to challenge voters sent the list directly to the county without the challenger having the opportunity to review it.⁷ The magnitude of these challenges, combined with the incomplete information provided to support them, significantly limits county boards’ capacity to perform other duties because they require substantial resources to resolve in good faith.

The burden these challenges place on county boards is prohibitive to the faithful and impartial execution of their duties, especially during the busiest times of the election cycle. Recently, in Gwinnett County alone, the number of voter challenges forced the county to devote 5 to 10 staffers’ attention “all day, every day, six days a week over [a] couple of weeks,” taking considerable capacity from the board.

Further, despite the overwhelming magnitude of challenges since 2020, as was the case in Gwinnett, they are rarely successful and regularly appear based on unreliable methodologies and incomplete data. Additionally, many of the challenges targeted voters who were already designated as inactive. This doubling of efforts is inefficient and, without adequate guidance, risks improperly shifting complex election administration responsibilities away from county

² *Id.*

³ Expert Report and Affidavit for Plaintiff at 3-5, *Fair Fight Inc. v. True the Vote*, 2022 WL 20508366 (N.D.Ga.) (No. 2:20-CV-00302-SCJ).

⁴ *Id.* at 7.

⁵ *Fair Fight Inc. v. True the Vote* at 30.

⁶ *Id.* at 22.

⁷ *Id.* at 30.

boards to activists who do not have access to the information or expertise necessary to perform these list maintenance activities competently while shifting precious time and resources away from other essential election administration duties, including list maintenance.

County boards have also had to interpret the two relevant statutes without sufficient guidance. As a result, their interpretations have varied, which has led them to resolve challenges differently across the state for years. This lack of clarity can cause significant difficulties for voters and election administrators, who may struggle to interpret these statutes and must devote considerable resources, under the threat of disenfranchisement or sanctions, to attempt to comply with the law. County boards must be educated and empowered to take common-sense steps to ensure they only expend resources on legitimate, appropriate challenges. Similarly, voters must understand the challenge process and be empowered to navigate both sides of this process without being allowed to take advantage of it.

Georgia Code § 21-2-229 describes proceedings that enforce the quasi-judicial nature of the challenge process and requires (1) challenges to be submitted by individuals who are entitled to engage in the challenge process; (2) challengers to submit challenges “in writing and specify distinctly the grounds of such challenge”; (3) electors that are being challenged to be served with official notice of the challenge within ten days of a challenge being filed and three days before a hearing is held; and (4) registrars to hold hearings within ten days of notice of the challenge being served to the appropriate parties.⁸

The statute explicitly places the burden on “the elector making the challenge to prove that the person being challenged is not qualified to remain on the list of electors.” It anticipates that the parties to these proceedings will seek subpoenas from the board of registrars “for the attendance of witnesses and the production of books, papers, and other material” to prove their case in these proceedings and “to serve such subpoenas and, if necessary, to enforce the subpoenas by application to the superior court.” The language of these provisions even allows subpoenaed witnesses to be “paid the same mileage and fee as allowed and paid witnesses in civil actions in the superior court.”⁹

If the challenge is successful, the challenged voter’s “application for registration shall be rejected or the person’s name removed from the list of electors, as appropriate,” though both parties have the right to appeal through a petition to the superior court within ten days of the final decision.¹⁰ These proceedings are required, and the statute subjects county boards who fail to comply with these provisions to sanctions by this Board.¹¹

The provisions of Georgia Code § 21-2-230 share much of the same language and many other similarities with those of the previous statute, even incorporating many of its procedures by reference. However, § 21-2-230 also contains many unique mechanisms in addition to those contained in the previous statute, including (1) various restrictions on when a challenge to a

⁸ Ga. Code Ann. § 21-2-229(a-b)

⁹ *Id.* at § 229(c)

¹⁰ *Id.* at § 229(c)

¹¹ *Id.* at § 229(f)

person's right to vote can be made;¹² (2) an immediate probable cause determination by the board and additional related notice requirements;¹³ (3) procedures addressing challenged voters who attempt vote and resolving certain challenges prior to certification;¹⁴ and (4) procedures addressing moot challenges.¹⁵

These provisions allude to the gravity of these proceedings and indicate that challenges filed pursuant to this section of the Georgia code should be crafted carefully and contain the information necessary to justify the time, resources, and risks related to challenge proceedings under these statutes. These regulations attempt to provide sorely needed guidance regarding the language of these statutes by (1) clarifying the requirements for standing to initiate challenge proceedings, (2) standardizing the depth and quality of information included by electors when filing challenges, (3) ensuring that the burden of substantiating claims in these proceedings is appropriately allocated, (4) promoting uniformity across counties regarding the appropriate standards of proof when resolving challenge proceedings, and (5) emphasizing specific deadlines for eligible electors to file certain challenges.

Eligibility to Initiate Challenge Proceedings

As previously mentioned, both of Georgia's voter challenge statutes limit who may challenge voters. The statutes clearly restrict participation in the challenge process to those with the right to vote and register to vote in the jurisdiction where the challenge is being filed. This requirement further emphasizes the personal, individualized nature of these proceedings and demonstrates the need for regulations clarifying how county officials should resolve challenges filed by individuals lacking the qualifications, especially in light of how many challenges have been filed in recent years.

Despite the language demonstrating which parties are eligible to initiate challenge proceedings, many challenges appear to be filed by individuals who do not meet the necessary qualifications under Georgia law. The language in these regulations attempts to address these issues by (1) emphasizing that individuals who are not eligible voters may not challenge potential or existing voters in this state; (2) clarifying that even eligible voters may not challenge other individuals outside the jurisdiction where they are registered; and (3) creating guardrails to make it easier for county boards to save resources by ensuring that they are only considering challenges from eligible parties in compliance with Georgia law. Election officials will conserve county resources and better meet the needs of their communities by dismissing challenges that have been improperly filed by individuals who lack the necessary credentials in the early stages of the process.

Standards for Filing a Challenge

Both § 21-2-229 and § 21-2-230 require that challenges be "in writing and specify distinctly the grounds of such challenge." This language creates a clear requirement for challenges to provide enough information for election officials to understand the reason for the

¹² Ga. Code Ann. § 21-2-230(a)

¹³ *Id.* at § 230(b)

¹⁴ *Id.* at § 230(c), (e), (g), (h), & (i)

¹⁵ *Id.* at § 230(d)

challenge and make specific and well-supported allegations warranting the challenge process. Challengers have failed to meet this standard in many instances by providing short, unsubstantiated grounds for these challenges, which risks improperly shifting the burden of providing enough information on the face of the challenge onto election officials and allowing private individuals to engage in potentially systematic list maintenance activities instead of the targeted process described in these statutes.

As the district court mentioned¹⁶ and an expert testified¹⁷ in ongoing voter challenge litigation, there are serious questions about voter challengers' methods to produce their challenge lists. Even if the process by which these lists are produced is as complex as some challengers have implied, it is clear that it is currently inadequate to identify challenges correctly with any degree of consistency. This lack of accuracy, combined with the sparse, undeviating explanations for large numbers of challenges, has created the need for regulations to prevent this process from being abused and require electors who wish to initiate these proceedings to fulfill their responsibility to perform these inquiries with diligence.

Additionally, unsustainable challenges have been filed in excessive numbers, raising concerns that they were insufficiently individualized to meet the statute's requirements. The 11th Circuit has determined that list maintenance activities can be considered “systematic” if they “did not rely upon individualized information or investigation to determine which names from the voter registry to remove” and “instead used a mass computerized data-matching process to compare the voter rolls with other state and federal databases, followed by the mailing of notices.”¹⁸

If adopted, these regulations will require individuals to provide enough information at the beginning of the process to allow election administrators to determine if a challenge filed against a voter in their jurisdiction is reasonable and deserves to be heard by the board of registrars and dismiss the challenge if it does not. Challengers must not be allowed to circumvent their responsibilities under Georgia’s voter challenge process, especially not to the detriment of the election officials who work to ensure that all Georgians can enjoy their fundamental franchise rights.

Probable Cause

These regulations also assist county registrars in adhering to the procedures enshrined in Georgia Code § 21-2-230 by providing additional guidance regarding provisions requiring county boards to determine whether sufficient probable cause exists to substantiate a challenge to a voter’s eligibility to register or remain registered to vote.

Georgia courts have defined probable cause as the existence of such facts and circumstances that would create a reasonable belief that an accused person committed the act alleged¹⁹ and have cautioned that “(r)umor, suspicion, speculation or conjecture is not sufficient

¹⁶ *Fair Fight* at 30.

¹⁷ Expert Report at 3-5, and 7.

¹⁸ *Arcia v. Fla. Sec’y of State*, 772 F.3d 1335, 1344 (11th Cir. 2014).

¹⁹ *Adams v. Carlisle*, 278 Ga. App. 777, 782 (2006)

to show probable cause.”²⁰ Further, to evaluate claims of malicious prosecution, the Georgia Code specifies that the “lack of probable cause shall exist when the circumstances are such as to satisfy a reasonable man that the accuser had no ground for proceeding but his desire to injure the accused.”²¹ These standards combined contextualize the contours of whether probable cause exists and provide valuable tools for election officials adjudicating challenge proceedings.

Probable cause is the first step in the process created for challenges filed pursuant to Code Section § 21-2-230, ensuring that these challenges will not drain county resources or improperly disenfranchise eligible voters. If adopted, these regulations will ensure that challenges provide enough evidence to support a “reasonable belief” that the challenged voter is not entitled to register or remain registered to vote. Many of the challenges considered by county boards thus far have likely failed to meet this standard, requiring county officials to expend significant resources to resolve them.

By providing specific guidance regarding probable cause, the State Election Board can alleviate the strains that excessive numbers of unsustainable challenges have placed on election officials and ensure that voters’ rights to vote and remain on Georgia voter rolls are not hindered or inconvenienced without sufficient evidence to begin challenge proceedings in earnest.

Burden of Proof

Despite the language in Georgia’s § 21-2-229 explicitly stating that “the burden shall be on the elector making the challenge to prove that the person being challenged is not qualified to remain on the list of electors,” many county boards have born the sole responsibility of performing the work to determine whether a voter is eligible to vote in Georgia.

County officials are granted the authority to issue subpoenas at the *request* of either party to these proceedings. Still, they are not charged with the obligation to identify and produce the witnesses, documents, or other materials contemplated by the statute’s language. Despite the language explicitly delegating the burden of proof to the moving party in these proceedings, there have been issues concerning the identification and production of the necessary evidence to resolve this process.

These regulations’ requirements will make clear to election officials and potential challengers that challengers, not election officials, must perform the work necessary to substantiate the allegations that form the basis of these proceedings. They describe how challengers must meet their burden under this statute and provide a standard by which election administrators may evaluate the evidence produced to substantiate voter challenges.

In addition to emphasizing the requirements of this statute, the proposed regulations clarify that these challenges should be evaluated under the clear and convincing evidence standard. Georgia courts have described the clear and convincing evidence standard as “an intermediate standard of proof, requiring a higher minimum level of proof than the preponderance of the evidence standard, but less than that required for proof beyond a reasonable

²⁰ *Zimmerman v. State*, 131 Ga. App. 793, 794 (1974)

²¹ Ga. Code Ann. § 51-7-45 (West)

doubt.”²² This intermediate standard reflects the unique circumstances under which these claims are being evaluated and the gravity of these proceedings while promoting the standardization of the burden of proof that election officials use to evaluate the evidence presented by parties engaging in this process.

Deadlines for challenges

Finally, Georgia Code § 21-2-230 provides specific deadlines for challenges filed pursuant to that section. The regulatory language emphasizing the deadlines for certain types of challenges and requiring the dismissal of moot challenges will preserve administrative resources and ensure relevant election processes are completed promptly.

State Election Board’s Authority

Georgia law requires the State Election Board to promulgate regulations 1) “to obtain uniformity in the practices and proceedings” of election officials and “the legality and purity” in elections;²³ 2) “as will be conducive to the fair, legal, and orderly conduct of primaries and elections”;²⁴ and 3) “to define uniform and nondiscriminatory standards concerning what constitutes a vote and what will be counted as a vote for each category of voting system used in this state.”²⁵

Additionally, the Board must investigate or authorize the Secretary of State to investigate administration, fraud, and irregularities in elections and report violations to the relevant District Attorney or the Attorney General; make election-related policy recommendations to the General Assembly; employ assistants as necessary; create and conduct voter education programs to teach the public voting procedures and acceptable types of ID at the polls; and broadly to take other actions, consistent with law, that the Board determines “conducive to the fair, legal, and orderly” administration of an election.²⁶

The requested regulations are a necessary step for the Board to execute its duties as required and promulgate regulations to ensure the “fair, legal, and orderly” administration of elections in the State of Georgia. Additionally, clarifying these statutes will reduce the number of unsustainable challenges issued in violation of Georgia law and ensure that county election officials have received the information necessary to resolve these challenges fairly, equitably, and expeditiously for all parties across the state without needlessly wasting precious county resources. For these and the reasons mentioned above, we request that members of the board vote to adopt the regulations proposed in this petition.

Any and all pertinent existing facts as to the petitioner's interest in the matter;

²² *Jones v. Bebee*, 353 Ga. App. 689, 692 (2020).

²³ Ga. Code Ann. § 21-2-31(1).

²⁴ *Id.* at § 31(2).

²⁵ *Id.* at § 31(7).

²⁶ *Id.* at § 31(5),(6), (8), and (10).

Protect Democracy is a cross-ideological nonprofit group dedicated to defeating the authoritarian threat, building more resilient democratic institutions, and protecting our freedom and liberal democracy. To accomplish this, we have created a team that includes individuals who worked for Ted Cruz, Elizabeth Warren, the ACLU, and the Susan B. Anthony List. Our experts and advocates use litigation, legislative and communications strategies, technology, research, and analysis to stand up for free and fair elections, the rule of law, fact-based debate, and a better democracy for future generations.

Our interest in this matter concerns the negative impact of improperly filed elector challenges on our democracy's overall resilience and the voting population's confidence in our elections.

Any and all facts known to the petitioner which might influence the decision of the Board to initiate or not initiate rulemaking, including identification of any parties who it is known will or may be affected by the amended, repealed, or promulgated rule.

Georgia's voters and election officials will benefit from the clarification represented by these proposed rules because they will reduce the burden that unsustainable challenges place on election administrators and reduce confusion among Georgians about the challenge process.

Citations of legal authorities, if any, which authorize, support, or require the action requested by the petitioner:

Ga. Code Ann., § 21-2-229

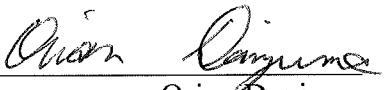
Ga. Code Ann., § 21-2-230

Ga. Code Ann., § 21-2-31

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202-768-2215

I, Orion Danjuma, Counsel for United to Protect Democracy, personally appeared before the undersigned public notary, duly authorized to administer oaths, and state under oath that the facts in this petition are true to the best of my knowledge and are alleged in good faith. I am authorized to submit this petition for United to Protect Democracy pursuant to Rule 183-1-1-.01.

Dated this 16th day of April 2024.


Orion Danjuma

Sworn to and subscribed before me this
16 day of April 2024.



CAMILE TAYLOR
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 01TA6137717
Qualified in Nassau County
Commission Expires January 8, 2026