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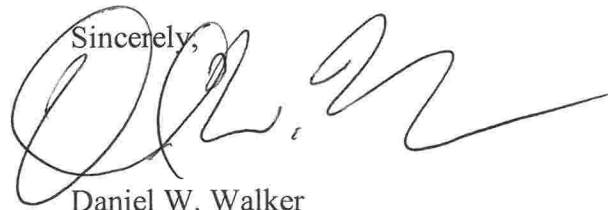
Via email: [sos.office@maine.gov](mailto:sos.office@maine.gov)  
Shenna Bellows, Secretary of State  
Office of the Secretary of State  
148 State House Station  
Augusta, Maine 04333-0148

**RE: Challenge to Non-Party Nomination Petition of Dr. Cornel West's Slate of Presidential Electors**

Dear Secretary of State Bellows:

Enclosed is a Challenge to Non-Party Nomination Petition of Dr. Cornel West's Slate of Presidential Electors being filed on behalf of Anne Gass and Sandy Marquis, both registered voters and residents of the State of Maine.

Sincerely,



Daniel W. Walker

DWW:apl  
Enclosure  
cc: Julie Flynn, Deputy Secretary of State

STATE OF MAINE  
SECRETARY OF STATE

**CHALLENGE TO NON-PARTY NOMINATION PETITION FOR DR. CORNEL  
WEST'S SLATE OF PRESIDENTIAL ELECTORS**

Anne Gass, a Maine registered voter and resident of Gray, and Sandra Marquis, a Maine registered voter and resident of Lewiston, challenge the non-party nomination petition of Dr. Cornel West—and his slate of presidential electors—to appear on the ballot for the general election as a candidate for President of the United States on November 5, 2024. Dr. West's petition should be rejected because it contains signatures procured through fraud by its circulators and it does not contain at least 4,000 valid signatures as required by statute. This challenge is supported by the following facts and allegations.

**Background.**

1. On July 30, Dr. Cornell West and his slate of presidential electors (adopting the political designation "Justice for All") submitted a petition to appear on the ballot in Maine for the presidential election to the Secretary of State. This petition was 2,408 pages, consisting of numerous individual petition forms.

2. It appears from his submission that Dr. West hired paid circulators in multiple corners of Maine to collect signatures on his (and his proposed slate of electors') behalf. As explained below, at least some of these circulators appeared to use fraudulent tactics to coerce Maine voters into signing his petition. And even on those pages where there is no apparent indication of fraud, many of the signatures submitted by Dr. West are invalid for other reasons, including signers who are not registered voters in Maine, and the failure to comply with important requirements of state law.

3. Within two days of receiving Dr. West's petition, the Secretary of State certified it, determining that it contained 4,978 valid signatures and otherwise met the requirements of Title 21-A for a non-party candidate for president to appear on the ballot.

4. This challenge under 21-A M.R.S. § 356 asks the Secretary of State to reverse this decision and reject Dr. West's petition because it does not contain at least 4,000 signatures as required by 21-A M.R.S. § 354, as a significant number of the signatures are invalid because, among other things, they were procured through fraud or knowingly false statements by its circulators, are attributed to individuals who are not registered voters in Maine, or otherwise fail to comply with the requirements of state law.

5. The reasons for this challenge are as follows.

**Reason #1 – Fraud or knowingly false statements.**

6. A significant number of the signatures on Dr. West's petition were obtained through fraud or knowingly false statements by circulators.

7. Multiple Mainers who signed Dr. West's petition have stated that the circulator who asked them to sign the petition told them it was in support of new legislation to prevent improper financial dealings by members of Congress and address corporate corruption. Dr. West's name was never mentioned and in at least some cases, apparently to conceal the true purpose of the petition, it appears that the circulator only showed them—and asked them to sign—the second page of the petition where the candidate's name is not shown.

8. Unfortunately, Maine is not the only place where circulators hired by Dr. West are reported to have collected signatures by deceiving voters about what they are

signing. A news outlet in Virginia, for example, has reported that “[a] group in Northern Virginia with clipboards and petitions asking people if they wanted to sign to ‘get Donald Trump off the ballot’ told News4 it was actually gathering signatures to get Dr. Cornel West on the ballot.”<sup>1</sup> Similarly, in North Carolina the state board governing elections said that “of nearly 50 people contacted at random from [Dr. West’s party’s] petition list, many said they didn’t sign the petition or didn’t know what it was for.”<sup>2</sup>

9. Under 21-A M.R.S. § 354(9), in the case of “fraud or a knowingly false statement by the circulator,” the petition as a whole is invalid. This is reason alone to reject Dr. West’s petition.

**Reason #2 – Signers are not registered voters.**

10. Under 21-A M.R.S. § 354(2), a nomination petition for presidential electors must be signed by someone registered to vote in Maine. The state expressly states that “[o]ther signatures are void.”

11. A significant number of the signatures on Dr. West’s petition that were counted as valid by the Secretary of State are by people who are not registered Maine voters.

12. A significant additional number of signatures cannot possibly be validated as belonging to registered Maine voters because they—and the information that is required to be printed next to them such as each voter’s name and address—are illegible.

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<sup>1</sup> Julie Carey, *Misleading Effort to Put Third-Party Presidential Candidate on Virginia Ballot*, NBC4 Washington (June 25, 2024), <https://www.nbcwashington.com/decision-2024/misleading-effort-to-put-third-party-presidential-candidate-on-virginia-ballot/3649131/>.

<sup>2</sup> Gary D. Robertson, *North Carolina Approves Party Seeking to Put RFK Jr. on the Ballot, Rejects Effort for Cornel West*, Associated Press (July 16, 2024), <https://apnews.com/article/north-carolina-elections-parties-president-kennedy-west-1d078d08a5deffced970898652d55a>.

13. Other lines only include the signers' first or last name, making it impossible to verify their identity and that they are in fact registered Maine voters.

14. These signatures are void and cannot be counted toward the 4,000 signatures required by state law. Without these signatures, Dr. West's petition has not met this threshold and must be rejected.

**Additional deficiencies in Dr. West's petition.**

15. A number of signatures on Dr. West's petition fail to meet other requirements of Title 21-A and cannot be counted toward the 4,000 required by state law.

16. Ditto marks are used in multiple locations throughout the petition for items other than residence address and municipality of registration. The signatures associated with these ditto marks cannot be counted. *See* 21-A M.R.S. § 354(4).

17. Several entries include no address, a wrong address, an incomplete address, or an address that is plainly not a residence address, such as a P.O. box. These entries cannot be counted. *See* 21-A M.R.S. § 354(3), (4).

18. There are at least several instances where the noted date that a voter, circulator, notary or municipal official signed a petition must be inaccurate either because it is in the future or is inconsistent with other dates on the same petition form. These entries cannot be counted.

19. In several cases, the municipal official appears to have mistakenly certified a different name than the one appearing on the petition. These entries cannot be counted.

20. Many of the forms included with Dr. West's petition that must be signed by a municipal official do not include or accurately state the name of the municipality. These entries cannot be counted.

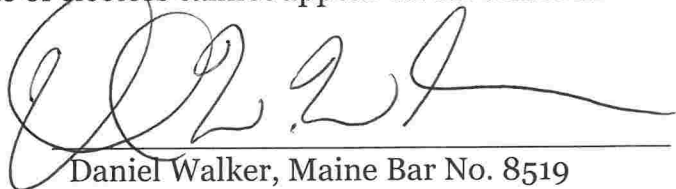
21. In some cases, voters appear to have crossed out their signatures, suggesting they no longer wish for their signature to be counted.

22. Dr. West's petition includes duplicate entries. A voter's signature can only be counted once toward the 4,000 signatures, and so any additional entries by that voter cannot be counted.

23. At least two voters appear to have signed Dr. West's petition before January 1, 2024, in violation of 21-A M.R.S. § 354(6).

### **Conclusion.**

Because of the reasons identified in this challenge, Dr. West's petition does not contain at least 4,000 valid signatures of Maine voters as required by state law. It must be rejected, and Dr. West and his slate of electors cannot appear on the ballot in November.



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