STATE OF NORTH CAROLINA

COUNTY OF WAKE

NORTH CAROLINA DEMOCRATIC PARTY,)
Plaintiff,))
V.)
NORTH CAROLINA STATE BOARD OF ELECTIONS, <i>et al.</i> ,)
Defendants.)

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 24CV023631-910

RESPONSE IN OPPOSITION TO EMERGENCY MOTION FOR PRELIMNARY INJUNCTION OR EXPEDITED HEARING ON THE MERITS AND MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM

Defendant We the People Party of North Carolina ("We the People Party") respectfully submits this Response in Opposition to the Emergency Motion for Preliminary Injunction or Expedited Hearing on the Merits filed by Plaintiff North Carolina Democratic Party ("NCDP") on August 1, 2024. We the People Party also respectfully moves for dismissal, pursuant to North Carolina Rule of Civil Procedure 12(b)(6), for failure to state a claim upon which relief can be granted.

INTRODUCTION

This lawsuit is frivolous. Plaintiff NCDP purports to state a cause of action against Defendants North Carolina State Board of Elections, its members and Executive Director (collectively, "the Board") and We the People Party on the ground that We the People Party established itself as a political party pursuant to N.C. Gen. Stat. § 163-96, as We the People Party is authorized under North Carolina law to do, and that the Board duly certified We the People Party, as it is required under North Carolina law to do. *See* § 163-96(a)(2).¹ NCDP does not allege that We the People Party failed to fulfill any applicable statutory requirement, nor that the Board

¹ All statutory citations are to the North Carolina General Statutes unless otherwise indicated.

lacked statutory authority to certify the party. NCDP cannot truthfully assert such allegations because all parties concede that We the People Party's petitions were sufficient under North Carolina law. Under such circumstances, the mandatory language of § 163-96(a)(2) required the Board to certify We the People Party as a new political party. *See* § 163-96(a)(2) (providing that the Board "*shall* forthwith determine the sufficiency of petitions filed with it and *shall* immediately communicate its determination to the State chair of the proposed new political party.") (emphasis added).

NCDP nonetheless alleges that the Board's certification of We the People Party was "in violation of North Carolina law," but pointedly fails to cite any statutory provision that was allegedly violated. (Verified Complaint and Petition for Judicial Review ("Compl.") ¶ 7. NCDP cannot cite any such provision because no provision was violated. NCDP's claims are therefore meritless on their face.

More important, it is well-settled that We the People Party has a First Amendment right to form a political party. NCDP's attempt to assert a cause of action against We the People Party for exercising this fundamental right is squarely foreclosed by decades of Supreme Court precedent, which NCDP conspicuously fails to address. Not surprisingly, given the utter lack of legal grounds for NCDP's claims, its Brief in Support of Emergency Motion for Preliminary Injunction or Expedited Hearing on the Merits ("NCDP Br.") is nearly devoid of citation to *any* authority recognizing the First Amendment rights implicated here. But the extraordinary relief that NCDP seeks – a court order prohibiting the Board from certifying We the People Party as a political party despite its full compliance with North Carolina law, (Compl. at 23) – would violate those rights. Controlling Supreme Court precedent therefore requires denial of NCDP's Motion and dismissal of this action.

NCDP has a history of pursuing frivolous litigation that, like this lawsuit, seeks to suppress North Carolina voters' choices by removing duly qualified new parties from the ballot. *See North Carolina Green Party v. NCSBE*, 619 F. Supp. 3d 547 (D.N.C. 2022) (granting NCDP's motion to intervene and directing the Board to place North Carolina Green Party's ("NCGP") candidates on 2022 general election ballot). In the NCGP litigation, as here, NCDP "instigated a significant amount of the (Board's) delay" in certifying NCGP as a party, and the Court found that NCDP "do[es] not appear in this court with clean hands." *North Carolina Green Party v. NCSBE*, 620 F. Supp. 3d 407, 414, 415 (D.N.C. 2022). Moreover, in rejecting NCDP's claims, the Court concluded, "it is plain for anyone who looks to see that [NCDP] simply do[es] not want to give voters the option to vote for the two Green Party candidates because [NCDP] fear[s] that some voters will vote for the two Green Party candidates instead of the Democratic candidates." *Id.* at 414.

When it became clear that NCDP would not prevail in the NCGP litigation, NCDP filed a subsequent lawsuit against NCGP and the Board in this Court, which challenged the Board's decision to certify NCGP as a party and would, if successful, vitiate any relief the federal court granted. *See North Carolina Green Party*, 619 F. Supp. 3d at 569. The federal court thus found it necessary, in granting such relief, to make clear that the Board "shall follow this court's order," and that the Board's failure to do so would be "contempt of [the Court's] lawful authority, to be punished." *Id.* (citation omitted). Thereafter, the Court concluded that NCDP's "action in filing the state court suit was frivolous." *North Carolina Green Party v. NCSBE*, No. 5:22-cv-00276-D-BM at 10 (D.N.C. April 2, 2024) (unpublished order) (attached). The Court further concluded that NCDP's motion to stay its order granting NCGP relief pending appeal "was without foundation" because "[t]he record flatly contradicted all of [NCDP's] arguments." *Id.* at 11 (citation, quotation

marks and brackets omitted). The Court therefore awarded NCGP attorney's fees for "work incurred as a result of [NCDP's] frivolous actions." *Id.*

This case is more of the same. NCDP's claims are wholly without foundation. They rely on nothing more than innuendo, the purpose of which is to muddy the waters and convince this Court that We the People Party somehow "violated" North Carolina law by establishing itself as a political party pursuant to the provision of North Carolina law that expressly authorizes it to do so, *see* § 163-96(a)(2) – a core political activity that, in any event, is fully protected under the First Amendment.

Furthermore, notwithstanding NCDP's significant involvement in the Board's delay in certifying We the People Party for 50 days beyond the July 1 statutory deadline for a new party to certify its candidates for placement on the ballot, NCDP waited nine days after the Board's belated decision to file this action, and waited another seven days after that to file its "emergency" Motion for preliminary relief. NCDP's delay has the effect – if not the purpose – of running out the clock and denying We the People Party a meaningful opportunity to seek appellate review in the unlikely event this Court grants the extraordinary relief NCDP requests. The Court should not countenance NCDP's inexcusable delay, much less grant the extraordinary relief it seeks. NCDP's Motion should be denied and its groundless lawsuit summarily dismissed pursuant to North Carolina Rule of Civil Procedure 12(b)(6).

FACTUAL BACKGROUND

A. We the People Party Complied With All Statutory Requirements to be Recognized as a Political Party and to Place Its Nominees on the General Election Ballot.

1. We the People Party filed the required number of signatures from registered North Carolina voters

Section 163-96 provides, in relevant part, that a new political party may be recognized if

a group of voters files with the Board "petitions for the formulation of a new political party which are signed by registered and qualified voters in this State equal in number to one-quarter of one percent (0.25%) of the total number of voters who voted in the most recent general election for Governor," including "at least 200 registered voters from each of three congressional districts in North Carolina." § 163-96(a)(2). In 2024, this 0.25% requirement amounted to 13,865 signatures. These new-party petitions are due by "12:00 noon on the first day of June." § 163-96(a)(2).

On or about May 28, 2024, We the People Party filed 18,569 county board verified signatures from North Carolina registered voters with the Board, including at least 200 registered voters from each of three congressional districts in North Carolina. (See Exhibit A.)

2. We the People Party Had Valid Petition Forms

Petitions for the creation of a new political party shall contain on the heading of each page of the petition in bold print or all in capital letters the words: "THE UNDERSIGNED REGISTERED VOTERS IN _____ COUNTY HEREBY PETITION FOR THE FORMATION OF A NEW POLITICAL PARTY TO BE NAMED _____ AND WHOSE STATE CHAIRMAN IS ______, RESIDING AT ______ AND WHO CAN BE REACHED BY TELEPHONE AT ." § 163-96(b).

All printing required to appear on the heading of the petition shall be in type no smaller than 10 point or in all capital letters, double spaced typewriter size. In addition to the form of the petition, the organizers and petition circulators shall inform the signers of the general purpose and intent of the new party. *Id*. The petitions must specify the name selected for the proposed political party. *Id*.

We the People Party's petitions fully comply with the statute. (See Exhibit B.)

3. The Signers of the Petitions Were Informed as to its General Purpose and Intent

"The organizers and petition circulators shall inform the signers of the general purpose and intent of the new party." § 163-96(b). We The People Party organizers and circulators informed signers of the general purpose and intent of the new party. (See Exhibit A.)

B. The Board Properly Determined We the People Party's Petitions Were Sufficient

Once these petitions are submitted, the Board "shall forthwith determine the sufficiency of petitions filed with it and shall immediately communicate its determination to the State chair of the proposed new political party." § 163-96(a)(2). On July 16, 2024, We the People Party received its certification in an overwhelming approval vote of eighty percent (80%) of the Board. *See* <u>https://www.ncsbe.gov/news/press-releases/2024/07/16/state-board-recognizes-we-people-official-nc-political-party</u> (accessed August 8, 2024).

C. We The People Party Is a Qualified Party Under § 163-96

North Carolina law provides that the presidential ballot in this state will include the candidates "nominated by any political party recognized in this State under G.S. 163-96" and any "candidate for President of the United States who has qualified to have his or her name printed on the general election ballot as an unaffiliated candidate under G.S. 163-122." § 163-209(a). On July 16, 2024, We the People Party became a recognized political party in North Carolina under § 163-96. *See* <u>https://www.ncsbe.gov/news/press-releases/2024/07/16/state-board-recognizes-we-people-official-nc-political-party (accessed August 8, 2024).</u>

D. As a Qualified Political Party We The People Party Has Gained Ballot Access

If the Board recognizes a new political party, then in "the first general election following the date on which a new political party qualifies under the provisions of N.C.G.S. 163-96, it shall be entitled to have the names of its candidates for national, State, congressional, and local offices printed on the official ballots." § 163-98. This "new political party" may "select its candidates

by party convention," without the need to conduct a primary. § 163-209(a).

On June 29, 2024, We the People Party held its Inaugural State Convention and made the following nominations: Mark Ortiz for County Commissioner of Rowan County; Jeff Scott for NC State Senate (District 40); Nicole Shanahan for Vice President of the United States; and Robert F. Kennedy Jr. for President of the United States. (See Exhibit A.)

E. We the People Party's Certification was Unreasonably Delayed by the Board

The statute requires the Board to review a determine the sufficiency of petitions "forthwith". § 163-96(a)(2). The term "forthwith" is defined in Black's Law Dictionary as "immediately; without delay; directly; within a reasonable time under the circumstances of the case; promptly and with reasonable dispatch" (11th ed. 2019). However, We the People Party was delayed multiple times in the process to the detriment of its candidates and party activities. (See Exhibit A.)

This began with a hearing on June 26, 2024, thirty (30) days after We the People Party hand-delivered 18,569 county Board verified signatures, which was 4,704 signatures – or nearly 30 percent – more than the statutorily required amount. *Id.* That hearing ended in a postponement of We the People Party's certification due to challenges led by the Democratic Party and third-party affiliates, including NCDP. *Id.*

Another hearing followed on July 9, 2024, when the Board once again indicated that additional time was needed to review the same issues outlined in NCDP's Complaint, presumably because, as the findings demonstrated, "there were no 'smoking guns." *Id*.

The partisanship evident in the Board's continual rejection or postponement and attempts to find fault with We the People Party sparked criticism from its own members, who expressed concerns about the political motives behind the actions. "[We the People Party] was probably a victim of a political hit job, and I'm sorry if we wasted your time today, but I appreciate you coming and answering our questions honestly," said Board member Kevin Lewis. *See* Carolina Journal, "NCSBE Rejection of Third-Party Ballot Access Slammed as Political Hit Job by Dissenting Board Member," available at https://www.carolinajournal.com/ncsbe-rejection-of-third-party-ballot-access-slammed-as-political-hit-job-by-dissenting-board-member/ (accessed August 8, 2024). "These allegations are coming from outside the board of elections, and so the political hit job I'm talking about is arising from outside the state board of elections," Lewis added. *Id*.

Additionally, the House Oversight and Reform Select Committee summoned the Chair of the Board to testify on the matter. *See* House Oversight and Reform Select Committee, North Carolina General Assembly, available at NC Leg House Oversight [accessed August 6, 2024]. "We question the actions of the Board of Elections," Rep. Jake Johnson (R-Polk) stated. "We need answers as to why three parties that seemingly met the requirements to be on the ballot were rejected. If this ruling was politically motivated, as perceived, we owe it to the citizens of North Carolina to bring that to light." *Id*.

"How do we trust the board and its staff when their actions appear designed to limit ballot access for new parties?" asked Rep. Harry Warren (R-Rowan). "People need to trust the election system. The process to approve new parties this year has done little to foster that trust." *Id*.

Despite all these delays and lawfare tactics, the impeccable manner in which the We the People Party followed the statutes and created a political party led the Board to approve We the People Party's certification by a 4-1 vote in favor. *See* State Board of Elections Press Release, July 16, 2024, "State Board Recognizes We the People as Official NC Political Party," available at https://www.ncsbe.gov/news/press-releases/2024/07/16/state-board-recognizes-we-people- official-nc-political-party (accessed August 8, 2024).

In the end, "forthwith" took 50 days and yielded little except for We the People Party's vindication and certification. Out of 18,569 county board verified signatures, the Board's investigative team identified a range of zero - nine signatures as potentially questionable, which represents a range of 0.00% to 0.0004%. (See Exhibit A.) The Board conducted a thorough investigation, questioned numerous signers, and based on its findings, voted overwhelmingly to certify We the People Party. Indeed, by accounts from various North Carolina County Boards, the petitions were both the most rigorously inspected and the most impeccably executed they had seen. *Id.*

F. We the People Party Communicated Its General Purpose and Intent to Signers

On January 12, 2024, in Raleigh, NC, We the People Party members were provided with instructions and initial script sample. (See Exhibit C.) Three days later, on January 15, 2024, We The People Party Chair Ceara Foley slightly revised the instructions and added various sample scripts. (See Exhibit D.) Despite NCDP's selective editing intended to cast these instructions in a negative light, all scripts clearly included two key elements: (i) an intention to create a new political party in North Carolina, and (ii) an intention to nominate Robert F. Kennedy Jr. for President of the United States. This is the same general purpose and intent We the People Party has used throughout its petitioning efforts. (See Exhibit A.)

Ms. Foley has always trained We the People Party circulators to inform all signers, *in their own words*, that the "general purpose and intent" of the party was "creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values." (See Exhibit A.) This maintains the two aforementioned key elements. NCDP's attempt to misrepresent the

instructions' content omits that all sample scripts upheld We the People Party's clear general purpose and intent, namely, to form a new political party and to nominate candidates like Robert F. Kennedy Jr. Importantly, there is no requirement to use approved scripts, nor is there an obligation to have scripts approved by the Board, nor is there any statutory requirement for how petition circulators inform the signers. § 163-96(a)(2).

NCDP's attempt to create a misleading narrative is unfounded. That the general purpose and intent of We the People Party was clearly demonstrated to the signers of their petition is evident in the number of signed declarations supplied by We the People Party to the Board over the weeks they were reviewing We the People Party's petitions. (See Exhibit A.)

For example, the general purpose and intent of the party was communicated by We the People Party circulators to the signers, as evidenced by the 30 submitted declarations titled 'VOLUNTEER DECLARATION FOR WE THE PEOPLE PARTY,' all sworn under penalty of perjury *by the circulators of the petition*, which include in pertinent part: "I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values. I ensured that every individual I trained for signature gathering, if any, received the same instruction I did." (See Exhibit E.)

The general purpose and intent of the party was also communicated by We the People Party volunteer circulators to the signers, as evidenced by the 80 submitted declarations titled 'SIGNER DECLARATION FOR WE THE PEOPLE PARTY,' all sworn under penalty of perjury *by the signers of the petition*, which includes in pertinent part, "I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values." *Id*.

We The People Chair Ceara Foley attests: "While the Democratic Party and their donors expended tens of thousands of dollars on emails, harassment, calls, texts, and coercion in a futile search for any evidence of fraud, We The People was inundated with hundreds of supporters eager to sign declarations under penalty of perjury concerning our communicated general purpose and intent after just a single email. (See Exhibit A.) These declarations continue to arrive to We The People's email address at info@wethepoeplenc.com weeks later." *Id*.

Additionally, the general purpose and intent of the party was communicated by We the People Party circulators to the signers, as evidenced by the submitted declaration titled 'TRAINER DECLARATION FOR WE THE PEOPLE PARTY,' sworn under penalty of perjury by David Owen, a petitioning independent contractor. (See Exhibit F.) Mr. Owen attests, "I communicated that both paid and unpaid volunteers should explain to potential petition signers that the party's general purpose and intent included the creation of an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates including but not limited to Robert F. Kennedy, Jr., and those committed to the core values of We the People party." *Id*.

Finally, the We the People Party Articles of Association states in pertinent part: "We The People consists of three or more members joined by mutual consent for the common, nonprofit purposes of being a recognized independent third political third party in North Carolina outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values." (See Exhibit A.)

G. We The People Party of North Carolina Contemplates a Statewide, Ongoing Organization with Distinctive Political Character

Contrary to NCDP's false allegations, We the People Party had already begun constructing the infrastructure of a political party dedicated to the advancement of its core values prior to any questions of its validity from the Board or any other entity. The following details illuminate the broad-based political activity and organizational structure that We the People Party has instituted at this early stage of its development:

1. We The People Articles of Association: We the People Party is designated as an unincorporated nonprofit association, created under the laws of the State of North Carolina pursuant to Chapter 59B of the North Carolina General Statutes, known as the Uniform Unincorporated Nonprofit Association Act. (See Exhibit A.)

2. We The People Bylaws: We the People Party's governing Bylaws were authored by a licensed North Carolina attorney. *Id*.

i. **Executive Committee**: The members of the Executive Committee are Chair Ceara Foley, Vice Chair Ryan Rabah, Treasurer Anthony Noto, Assistant Treasurer Mark Ortiz, and Secretary Beth Baldino. (See <u>https://wethepeoplenc.com/our-team</u>.)

ii. **Treasurer Training**: Treasurers for a new political party are required to complete Treasurer training within 90 days of receiving appointment. (N.C.G.S. § 163-278.7(f)). Treasurer Anthony Noto completed his training on June 9, 2024 ensuring We the People Party and its members meet all statutory requirements. (See Exhibit A.)

iii. **Nominating Convention**: On June 29, 2024, We the People Party held its Inaugural State Convention. During this convention, the party formally nominated candidates

12

for various offices, reflecting its commitment to offering viable political alternatives and enhancing democratic participation. The nominees include Mark Ortiz for County Commissioner of Rowan County, Jeff Scott for the North Carolina State Senate, Nicole Shanahan for Vice President of the United States, and Robert F. Kennedy Jr. for President of the United States.

iv. **Financial Registration and Accounts:** We the People Party holds an Employer Identification Number. *Id.* Additionally, the party maintains a bank account at an accredited institute, Wells Fargo, to support its operations across North Carolina as required by statute. *Id.*

v. **Branding**: The Party has developed and officially adopted a logo, which is prominently displayed across all its platforms, including the official website, letterhead, and other formal communications. (See <u>https://wethepeoplenc.com/</u>.)

vi. **We The People Website**: We the People Party has had a presence on the web prior to the party handing in its petitions to the Board. This website includes a prominent We the People Party logo, a call for membership, a call for down ballot candidates, a newsletter subscriber form, a webpage dedicated to the party's Statement of Core Values, press release link, listing of the Executive Committee, contact information, etc. This website serves as a central hub for communication and engagement with We the People Party supporters and the general public. *Id.*

vii. **North Carolina Political Office Spreadsheet**: Prior to March 19th, members of We the People Party developed an active analysis of all districts in North Carolina as relates to running down ballot candidates. Further, We the People Party is in discussion with other North Carolina candidates that are seeking its endorsement. (See Exhibit G.)

viii. We the People Newsletters: We the People Party has over one hundred subscribers for its newsletter. (See Exhibit A.)

13

ix. We the People Facebook Account: We the People Party has over 1,100 followers for their Facebook account. *Id.* That account was created months before any investigation by NCDP or the Board. *Id.*

x. Numerous Statewide Events: We the People Party has conducted numerous events throughout North Carolina to spread the word and values of the party, including (1) Faith <u>NC 4th of July Parade</u>: We the People Party had a parade float at the Fourth of July celebration in Rowan County; (2) <u>Pride CLT Application</u>: We the People Party has applied to have a booth at Charlotte Pride in Mecklenburg County; (3) <u>More Voices, More Choices</u>: We the People Party was a participant in a political rally in Wake County; (4) <u>North Carolina State University Packapolooza</u>: We the People Party has applied for participation at this event in Wake County. (*See* Exhibit A.)

x. **Requests to Change Party Affiliations**: Numerous We the People Party supporters have sent in paperwork to various county board asking for their party affiliation to be changed to We the People Party. (See Exhibit A.)

xi. **Down Ballot Candidates**: We the People Party of North Carolina is running two down ballot candidates, Jeff Scott and Mark Ortiz. Mr. Scott, a registered voter and citizen of North Carolina, has been actively involved in politics since 2017 when he was elected Chair of the Libertarian Party of Mecklenburg County, a role he held until February 2023. During his tenure as a Libertarian, he ran for several political offices, including the Charlotte City Council, U.S. Congress, and the North Carolina State Senate. As a current candidate for the North Carolina State Senate District 40 in the 2024 election, Scott has been challenging a five-term Democrat incumbent. His engagement with the We the People Party began in February 2024, attending grassroots meetups and actively gathering petition signatures to support the party's certification. He reviewed electoral races, strategized with We the People Party leadership, and reached out to experienced political figures to encourage potential candidacies and endorsements. Scott formally filed for office in July 2024, established a campaign bank account, filed necessary paperwork, and changed his voter affiliation to align with the We the People Party's core values. He has invested significant resources into his candidacy, highlighting his commitment to being on the ballot. (See Exhibit G.)

Mr. Ortiz, a registered voter and citizen of North Carolina, is running for Rowan County Commissioner as a candidate for the We the People Party in the 2024 election. Previously a Democratic primary candidate for the U.S. House in North Carolina's 8th District in 2004 and 2006, Ortiz's experiences with the Democratic Party highlighted its gatekeeping tendencies and lack of genuine social change. Recognizing the Republican Party's dominance in Rowan County and the absence of Democratic candidates, Ortiz decided to challenge one-party rule. He filed for office on July 1, 2024, and has since completed necessary paperwork and established a campaign bank account. As a member of the Executive Committee and Assistant Treasurer of the We the People Party, Ortiz aims to introduce innovative solutions to community issues, such as housing costs and homelessness, while broadening political discourse and fostering a network to resist corporate governance. His campaign seeks to build a foundation for future political engagement and growth of the We the People Party as a viable alternative. (See Exhibit H.)

STANDARD OF REVIEW

"A preliminary injunction is an extraordinary measure taken by a court to preserve the status quo of the parties during litigation." *Kennedy v. Kennedy*, 584 S.E. 2d 328, 333 (2003). "It will be issued only (1) if a plaintiff is able to show *likelihood* of success on the merits of his case and (2) if a plaintiff is likely to sustain irreparable loss unless the injunction is issued, or if, in the

opinion of the Court, issuance is necessary for the protection of a plaintiff's rights during the course of litigation." *Id.* (emphasis original).

"On a Rule 12(b)(6) motion to dismiss, the question is whether, as a matter of law, the allegations of the complaint, treated as true, state a claim upon which relief can be granted." *Wood v. Guilford County*, 558 S.E. 2d 490, 494 (N.C. 2002) (citation omitted). Dismissal under Rule 12(b)(6) is proper when one of the following three conditions is satisfied: (1) the complaint on its face reveals that no law supports the plaintiff's claim; (2) the complaint on its face reveals the absence of facts sufficient to make a good claim; or (3) the complaint discloses some fact that necessarily defeats the plaintiff's claim. *Id.* (citation omitted).

ARGUMENT

I. NCDP Cannot Prevail on the Merits and Its Claims Should Be Dismissed Because They Are Barred by the First Amendment.

NCDP's attempt to state claims against We the People Party for establishing itself as a political party pursuant to § 163-96(a)(2) is squarely foreclosed by Supreme Court precedent. Such precedent unequivocally establishes that We the People Party has a First Amendment right to form a political party. The relief that NCDP seeks – a court order preventing We the People from exercising that right pursuant to North Carolina law, (Compl. at 23) – would violate that precedent. NCDP's Motion therefore should be denied and its claims dismissed.

A. It Is Settled Law That We the People Party Has a First Amendment Right to Establish Itself as a Political Party.

For more than half a century, the Supreme Court has repeatedly held that the First Amendment guarantees the right to form a political party. *See Kusper v. Pontikes*, 414 U.S. 51, 56-57 (1973). In *Kusper*, the Court declared:

There can no longer be any doubt that freedom to associate with others for the common advancement of political beliefs and ideas is a form of orderly group activity protected by the First and Fourteenth Amendments. The right to associate with the political party of one's choice is an integral part of this basic constitutional freedom.

Id. (citations and quotation marks omitted). Indeed, the matter was well-settled even before *Kusper* was decided 50 years ago:

Our form of government is built on the premise that every citizen shall have the right to engage in political expression and association. This right was enshrined in the First Amendment of the Bill of Rights. Exercise of these basic freedoms in America has traditionally been through the media of political associations. Any interference with the freedom of a party is simultaneously an interference with the freedom of its adherents.

NAACP v. Button, 371 U.S. 415, 431 (1963) (quoting *Sweezy v. New Hampshire*, 354 US 234, 250-51 (1957).

Time and again, the Court has reaffirmed this principle. See Clingman v. Beaver, 544 U.S. 581, 586 (2005) ("We have held that the First Amendment, among other things, protects the right of citizens 'to band together in promoting among the electorate candidates who espouse their political views.") (quoting California Democratic Party v. Jones, 530 U. S. 567, 574 (2000)); Timmons v. Twin Cities Area New Party, 520 U.S. 351, 357-58 (1997) ("The First Amendment protects the right of citizens to associate and to form political parties for the advancement of common political goals and ideas."); Colorado Republican Federal Campaign Comm. v. Federal Election Comm'n, 518 U.S. 604, 616 (1996) ("The independent expression of a political party's views is 'core' First Amendment activity no less than is the independent expression of individuals, candidates, or other political committees."); Norman v. Reed, 502 U.S. 279, 288 (1992) ("For more than two decades, this Court has recognized the constitutional right of citizens to create and develop new political parties."); Tashjian v. Republican Party of Conn., 479 U.S. 208, 214 (1986); ("The freedom of association protected by the First and Fourteenth Amendments includes partisan political organization."); Cousins v. Wigoda, 419 U.S. 477, 487-88 (1975) ("The National Democratic Party and its adherents enjoy a constitutionally protected right of political

association."); *Williams v. Rhodes*, 393 US 23, 31 (1968) ("The right to form a party for the advancement of political goals means little if a party can be kept off the election ballot and thus denied an equal opportunity to win votes.").

The North Carolina Supreme Court is in accord. *See Libertarian Party v. State*, 707 S.E. 2d 199, 204 (N.C. 2011) ("The First Amendment protects the right of citizens to associate and to form political parties for the advancement of common political goals and ideas.") (quoting *Timmons*, 520 U.S. at 357). That Court has concluded that the "associational rights rooted in the free speech and assembly clauses are of utmost importance to our democratic system." *Harper v. Hall*, 868 S.E. 2d 499, 545 (N.C. 2022) (quoting *Libertarian Party*, 707 S.E 2d at 205). "[C]itizens form parties to express their political beliefs and to assist others in casting votes in alignment with those beliefs." *Id.*

Based on this long line of precedent, there can be no question that We the People Party was engaged in core political activity when it established itself as a party pursuant to § 163-96(a)(2). Such activity is fully protected under the First Amendment. The hurdle NCDP faces in attempting to state its claims against We the People Party for establishing itself as a political party is therefore well-nigh insurmountable.

B. The First Amendment Bars NCDP's Claims.

NCDP concedes, as it must, that We the People Party established itself as a political party by timely and fully complying with § 163-96(a)(2). NCDP alleges, however, that this quintessentially protected First Amendment conduct was a "subterfuge" because We the People Party is merely "masquerading as a political party...." (Compl. ¶ 3.) According to NCDP, We the People Party's "sole purpose" is to qualify Robert F. Kennedy, Jr. for the ballot as its candidate for president – and this, in NCDP's view, is not a lawful reason to form a political party. (Compl. ¶ 2.) NCDP is wrong.

Even if NCDP's allegations were accurate – and they are not – it would not abrogate We the People Party's First Amendment right to form a political party. Simply put, the purposes for which a political party organizes itself is not an area in which the Constitution permits states to intrude. *See Eu v. San Francisco County Democratic Central Comm.*, 489 U.S. 214, 229 (1989) ("[A] political party's determination . . . of the structure which best allows it to pursue its political goals, is protected by the Constitution.") (quoting *Tashjian*, 479 U.S. at 224). Instead, "political parties' government, structure, and activities enjoy constitutional protection." *Timmons*, 520 U.S. at 358 (citation omitted); *see also Eu*, 489 U.S. at 230 (recognizing political party's "discretion in how to organize itself, conduct its affairs, and select its leaders.") We the People Party therefore has a First Amendment right to organize itself as a party for the purpose of promoting a particular candidate if that "best allows it to pursue its political goals...." *Eu*, 489 U.S. at 229 (quoting *Tashjian*, 479 U.S. at 224).

NCDP does not and cannot cite any authority to support its position that the First Amendment's guarantee of the right to form a political party does not extend to We the People Party if We the People Party intends to nominate a candidate who identifies as an independent. (Compl. \P 2.) Instead, NCDP relies on a single case recognizing that the "attempt to form a new political party and the act of seeking office as an unaffiliated candidate 'are entirely different' endeavors....'" *Buscemi v. Bell*, 964 F.3d 252, 265 (4th Cir. 2020) (quoting *Storer v. Brown*, 415 U.S. 724, 745 (1974)). But the conclusion of the Court's observation – which NCDP elides – is that "…neither is a satisfactory substitute for the other." *Storer*, 415 U.S. at 745. *Storer* thus recognizes that the right to access the ballot as an independent candidate, or by forming a political

party, are both constitutionally protected. *See id.* Consequently, the state may not compel an independent candidate to "choose the political party route if he wants to appear on the ballot in the general election[.]" *Id.* at 746 ("[W]e perceive no sufficient state interest in conditioning ballot position for an independent candidate on his forming a new political party.").

Following this precedent, the Board here correctly concluded that it may no more compel Robert F. Kennedy, Jr. to run as an independent, rather than seeking We the People Party's nomination, than the state in *Storer* could compel an independent to run as a partisan candidate. *See id. Storer* does not support NCDP's position, but refutes it.

This conclusion is reinforced by the history of "independent" presidential candidates who have qualified for North Carolina's ballot as nominees of a party. These include George Wallace in 1964 and 1968 and John Anderson in 1980. (Winger Decl. ¶¶ 2-5.) Additionally, Americans Elect qualified as a party in 2012, and No Labels qualified as a party in 2024, and both parties made clear that their sole purpose was to place a presidential ticket on the general election ballot. (Winger Decl. ¶¶ 6-7.) Indeed, non-major party presidential candidates frequently qualify for the ballot as independents in some states, and as the nominees of a political party in others. Examples include Robert LaFollette in 1924, Henry Wallace in 1948, George Wallace in 1968, John Anderson in 1980 and Ralph Nader in 2004. (Winger Decl. ¶ 10.)

Contrary to NCDP's overheated rhetoric, there is nothing improper, much less unlawful, about these candidates' associational choices. Under the First Amendment, such choices are the candidates' – not the state's – to make. *See Storer*, 415 U.S. at 745-46. The same is true of We the People Party. NCDP cannot state a claim against We the People Party for establishing itself as a political party or for nominating a candidate of its own choosing. It therefore cannot prevail on

its Motion and its claims should be dismissed pursuant to North Carolina Rule of Civil Procedure 12(b)(6).

II. NCDP Cannot Prevail on the Merits and Its Claims Should Be Dismissed Because It Fails to Allege a Violation of North Carolina Law.

NCDP asserts four causes of action, but they are all variations of the same baseless theory. According to NCDP, the Board "abdicated" its duty to determine the sufficiency of petitions submitted pursuant to § 163-96(a)(2) by deeming We the People Party's petitions sufficient when all parties concede that the petitions were in fact sufficient. (Compl. ¶¶ 80-109.) Based on this theory, NCDP asserts: (1) a claim against the Board for violating § 163-96 (First Cause), (Compl. ¶¶ 80-88); (2) a claim against the Board for violating the North Carolina Administrative Procedure Act (Second Cause), (Compl. ¶¶ 89-96); (3) a claim for a declaratory judgment against the Board and We the People Party (Third Cause), (Compl. ¶¶ 97-103); and (4) a claim for a writ of mandamus against the Board (Fourth Cause), (Compl. ¶¶ 104-109). All these claims fail for the same reasons.

Throughout its pleading and briefing, NCDP asserts that the Board's certification of We the People Party was "unlawful" and "in violation of North Carolina law...." (Compl. ¶ 7; NCDP Br. at 13.) Yet NCDP concedes, as it must, that We the People Party's petitions were sufficient under § 163-96(a)(2). Under those circumstances, the Board had no discretion to deny We the People Party's certification as a party. The mandatory language of the statute requires that the Board "shall" certify a party whose petitions are deemed sufficient. *See* § 163-96(a)(2).

NCDP nonetheless insists that the Board's certification of We the People Party was unlawful because We the People Party was also required to comply with § 163-96(b), which required its petition circulators "to inform the signers of the general purpose and intent of the new party." According to NCDP, the "sole purpose" of We the People Party's petitions was to qualify Robert F. Kennedy, Jr. for North Carolina's 2024 general election ballot, and "[t]his is not a permissible purpose for a political party under North Carolina law." (Compl. ¶¶ 84-85.) Once again, NCDP is wrong.

As a threshold matter, if North Carolina law were construed to require a candidate who identifies as independent to seek ballot access as an independent, instead of associating with a party that wishes to nominate him, the law would most certainly be unconstitutional. *See supra* Part.I. *Storer* – the case on which NCDP principally relies – makes clear that states may not require candidates to run as independents or as nominees of a party. *See Storer*, 415 U.S. at 745-46. Instead, "[t]he First Amendment protects the right of citizens to associate and to form political parties for the advancement of common political goals and ideas." *Libertarian Party*, 707 S.E. 2d at 204 (quoting *Timmons*, 520 U.S. at 357). That is no less true of candidates who identify as political independents.

Furthermore, NCDP's convoluted reasoning does not even comport with the plain terms of North Carolina's statutory scheme. Under North Carolina law, a candidate may run as an independent pursuant to § 163-122, or a candidate may choose to affiliate with a political party that qualifies pursuant to § 163-96(a). Nothing in the terms of those statutory provisions remotely suggests that only one avenue is available to a particular candidate under particular circumstances. Specifically, § 163-122 does not state that candidates who identify as "independent" must qualify for the ballot pursuant to that provision rather than by qualifying pursuant to § 163-96(a). On the contrary, the plain terms of § 163-122 provide that a voter "who seeks" to run as an unaffiliated candidate must follow its provisions. But if a group of voters seeks to form a political party and nominate that same candidate, they may do so pursuant to § 163-96(a). The plain terms of North Carolina's statutory scheme therefore refute NCDP's claims. *See State v. Dudley*, 842 S.E.2d 163,

164 (2020) ("*The intent of the legislature may be found first from the plain language of the statute*, then from the legislative history, the spirit of the act and what the act seeks to accomplish.") (emphasis added).

Lacking any precedential authority to support its position, and finding no support in the plain terms of § 163-96 or § 163-122, NCDP resorts to assertions that the Board's certification of We the People Party violated certain canons of construction. (NCDP Br. at 16-18.) These assertions are unavailing. As to the first – that the Board "failed to apply the specific-general canon of construction," (NCDP Br. at 16 (citation omitted)), NCDP is simply incorrect. Section 163-122 is not "more specific" than § 163-96, but rather, the two provisions are equally specific in establishing two alternative procedures to qualify for the ballot. The Board was under no obligation – indeed, it had no authority – to impose the terms of § 163-122 on We the People Party and it properly declined to do so.

Nor did the Board violate the canon of construction that "a statute may not be interpreted in a manner that would render any of its words superfluous." (NCDP Br. at 17 (citation omitted).) The Board properly concluded that We the People Party complied with § 163-96(a)(2). This does not render § 163-122 superfluous. Section 163-122 establishes a separate procedure for candidates to qualify for the ballot, the meaning of its terms remain fully intact, and it is available for any candidate who wishes to pursue it.

What remains of NCDP's position consists of nothing more than innuendo. NCDP repeatedly asserts that We the People Party is a "subterfuge" that is only "masquerading as a political party...." (NCDP Br. at 2; NCDP Br. at 7, 10, 21.) But it is NCDP that is attempting to perpetrate a subterfuge in this proceeding. According to NCDP, We the People Party's instructions for its petition circulators "urge the circulator to tell the voter that the 'sole purpose of this petition'

is 'to place the name of Robert F. Kennedy Jr. on the 2024 general election ballot.'" (NCDP Br. at 6.) As NCDP well knows, however, the full text of the instructions – which NCDP misleadingly elides from the quotations it sprinkles throughout its brief – is as follows:

The sole purpose of this petition **to qualify a new political party in North Carolina** – **"We The People" Party** – to place the name of Robert F. Kennedy, Jr. on the 2024 general election ballot as a candidate for the office of President of the United States. You cannot collect a signature by telling a voter the petition is to "Save America" or "Help the Poor."

BE HONEST WITH THE VOTERS.

(NCDP Br. at 6 (emphasis added).)

We the People Party's petitioners explicitly advised voters that the purpose of the petition was to qualify a new party that intended to nominate Robert F. Kennedy, Jr. for president. Its instructions expressly advised petition circulators, in all capital letters, to "be honest with the voters." NCDP's assertion that this constitutes a subterfuge is risible.

Moreover, the evidence in this record demonstrates that We the People Party is a bona fide political party in every sense of the term. (*See supra* at 4-15.) NCDP may not like it, but it's perfectly clear why that is. "[I]t is plain for anyone who looks to see that [NCDP] simply do[es] not want to give voters the option to vote for the [We the People Party] candidates because [NCDP] fear[s] that some voters will vote for the [We the People Party] candidates instead of the Democratic candidates." *Green Party of North Carolina*, 620 F. Supp. 3d at 414. Here, as in *Green Party of North Carolina*, that is not a valid basis for NCDP's claims.

NCDP's claims have no basis in North Carolina law. They have no basis in fact. Because NCDP cannot prevail on its groundless claims, its Motion should be denied and this case should be dismissed pursuant to North Carolina Rule of Civil Procedure 12(b)(6).

III. The Remaining Preliminary Injunction Factors Weigh Decisively Against Granting the Extraordinary Relief NCDP Seeks Here.

The remaining elements of the preliminary injunction test – the irreparable injury in the absence of an injunction, the balance of the equities, and the public interest – all weigh decisively against NCDP. NCDP has no valid basis for its claims, and therefore it cannot demonstrate any injury, much less irreparable injury. We the People Party, by contrast, will plainly suffer irreparable injury in the unlikely event the Court grants NCDP the extraordinary relief it requests and orders the Board not to certify We the People Party or place its candidates on the ballot. As the Supreme Court has recognized, the "loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury." *Elrod v. Burns*, 427 U.S. 347, 373 (1976). Here, that injury would be suffered not only by We the People Party and its members and candidates, but also by the thousands of North Carolina voters who signed its petitions and wish to have the choice to associate with and vote for its candidates. As to the balance of the equities, NCDP is in no way harmed by the denial of relief to which it is manifestly not entitled. Finally, upholding We the People's core First Amendment rights – and those of the thousands of voters who signed its petitions – plainly serves the public interest.

CONCLUSION

For the foregoing reasons, NCDP's Emergency Motion for Preliminary Injunction or Expedited Hearing on the Merits should be denied, and further, its claims should be dismissed pursuant to North Carolina Rule of Civil Procedure 12(b)(6). Additionally, We the People Party reserves the right to seek additional relief, including that available pursuant to North Carolina Rule of Civil Procedure 11, as appropriate.

Respectfully submitted,

/s/ Ryan Rabah Ryan Rabah N.C. State Bar No. 44726 RYAN RABAH LAW, PLLC 3020 Prosperity Church Road Suite I-271 Charlotte, NC 28269 Tel: (980) 263-9293 ryan@ryanrabahlaw.com

Oliver B. Hall Oliver B. Hall Admitted *pro hac vice* DC Bar. No. 976463 CENTER FOR COMPETITIVE DEMOCRACY P.O. Box 21090 Washington, DC 20009 (202) 248-9294 oliverhall@competitivedemocracy.org

/s/Melissa Cowan Melissa Cowan* More Voter Choice Fund Inc. 8 Mosher Place West Hurley, NY 12491 845-706-3303 melissa@morevoterchoicefund.org NY Bar Number: 5441860

Counsel for Defendant We the People Party of North Carolina

*Motion for admission Pro Hac Vice pending

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2024 the foregoing was served upon the parties to

this action by electronic mail and by Odyssey to counsel of record at the following addresses:

Raymond M. Bennett (ray.bennett@wbd-us.com) Samuel B. Hartzell (sam.hartzell@wbd-us.com) WOMBLE BOND DICKINSON (US) LLP 555 Fayetteville Street, Suite 1100 Raleigh, NC 27601

John R. Wallace (jrwallace@wallacenordan.com) WALLACE & NORDAN LLP 3737 Glenwood Ave, Suite 260 Raleigh, NC 27612

Counsel for Plaintiff

Terence P. Steed (tsteed@ncdoj.gov) Mary C. Babb (mcbabb@ncdoj.gov) N.C. DEPARTMENT OF JUSTICE Post Office Box 629 Raleigh, N.C. 27602

Counsel for State Board Defendants

Date: August 8, 2024

<u>/s/ Ryan Rabah</u> Ryan Rabah

EXHIBIT A – Ceara Foley Declaration

STATE OF NORTH CAROLINA

COUNTY OF WAKE

NORTH CAROLINA DEMOCRATIC PARTY,

Plaintiff,

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS, et al.,

Defendants.

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 24CV023631-910

DECLARATION OF CEARA FOLEY

I, Ceara Foley, hereby declare subject to the penalty of perjury that the following is true and correct to the best of my knowledge:

- I am a registered voter and citizen of North Carolina residing at 157 Laurel Loop, Asheville, NC 28806.
- 2. I am the State Chair for the We The People Party of North Carolina, actively involved in efforts to establish a viable political alternative outside the traditional two-party system.
- 3. Contrary to paragraphs 44-49 of the complaint I was not employed by the Kennedy Campaign when I filed to create the party on January 10th nor when I provided petition instructions to petitioners, nor when Mr. Kennedy announced his affiliation with the prospective party.
- 4. Our petition drive began with instructions provided during an in-person training session on January 12th. These instructions were subsequently revised and redistributed on January 15th to ensure clarity and consistency throughout the drive. No revisions were made to these documents in June and the document that was turned

1

in to the board on May 28th was the same we used through the entirety of petitioning. All sample scripts or instructions have stated (i) we are starting a new party, and (ii) we intend to nominate Robert F. Kennedy. This is the same general purpose and intent We The People has used throughout its petitioning efforts.

- 5. I was the primary trainer of our circulators and I instructed them all to inform signers of the petitions, in their own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly called 'We The People' and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- Everyone I trained regarding petitions was instructed to train others in the same manner.
- 7. The authenticity and transparency of our campaign are evident through our evolving website and the proactive creation of our Facebook page on March 19th, which captures the motivations and beliefs of our supporters. We have over 1,100 followers. (https://www.facebook.com/WeThePeopleNC/about_profile_transparency). Additionally, our Bylaws were written by a licensed North Carolina attorney and our website domain purchased and created after we were confident we had reached the threshold to be validated by the State.
- 8. Prior to the deadline of 6/01/2024, we turned in 24,509 petition signatures to the counties, roughly 76% over the statutory requirement. On or about May 28, 2024 we turned into the NCSBE 18,569 signatures that had been verified by 90 North Carolina County Boards, roughly 34% over the statutory requirement.

- 9. On June 26th we were told that instead of certifying our party "forthwith" and "immediately responding" as the statute requires the NCSBE would be investigating the claims resulting from an expensive lengthy campaign of coercion, confusion, emotional manipulation and voting 3 to 2 down party lines against certifying our party "for now". A decision Mr. Eggers referred to as "and when the chair implied continuing the search because "where there's smoke there's fire" Mr. Lewis replied "I have yet to smell any smoke."
- 10. After the frivolous challenge, we collected 80 declarations from petition signers within hours of sending an email regarding the issue, asserting their full understanding and support of the petition's intent, starkly contrasting with the opposition's prolonged verification efforts that failed to uncover any substantive issues. We also collected 30 declarations from petition circulators stating they properly informed signers about our general purpose and intent. More of these declarations arrive each week at info@wethepeoplenc.com.
- 11. On June 29, 2024, we held our State Convention online and made the following nominations: Mark Ortiz for County Commissioner of Rowan County; Jeff Scott for NC State Senate (District 40); Nicole Shanahan for Vice President of the United States; and Robert F. Kennedy Jr. for President of the United States.
- 12. On July 9th the board confirmed that out of 18,569 county board verified signatures, the NCSBE investigative team identified anywhere from zero all the up to nine signatures as questionable, which represents a range of 0.00% to 0.0004%. Nine or less, out of Eighteen Thousand Five Hundred and Sixty Nine signatures! This can be seen from 38:02 39:25 on the video entitled 'State Board of Elections Meeting-

3

20240709' located at https://dl.ncsbe.gov/?prefix=State_Board_Meeting_Docs/2024-07-09/. A statistical insignificance.

While the Democratic Party and their donors expended tens of thousands of dollars on emails, harassment, calls, texts, and coercion in a futile search for any evidence of fraud, We The People was inundated with hundreds of supporters eager to sign declarations under penalty of perjury concerning our communicated general purpose and intent after just a single email.

- 13. We aim to challenge the corporate duopoly in North Carolina by nominating candidates who uphold our core values of democracy, health, environmental sustainability, and transparency and are detailed on our website. We have over 100 people signed up for our newsletter. (www.wethepeoplenc.com)
- 14. We The People Articles of Association also says: "We The People consists of three or more members joined by mutual consent for the common, nonprofit purposes of being a recognized independent third political third party in North Carolina outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.
- 15. We have strictly adhered to state statutes throughout our petition process, earning praise from county board officers for our meticulous approach.
- 16. On June 9th, 2024 our Treasurer, Anthony Noto finished his mandatory treasurer training with the state. Additionally, we have filed all the appropriate paperwork, opened our bank account, and have an EIN number.

- 17. The certification of our party was delayed by unfounded claims and procedural hurdles, impacting our candidates' ability to campaign effectively.
- 18. The party certification, originally expected at June 26, 2024 NCSBE hearing, was postponed due to frivolous challenges from the DNC and Clear Choice (a Democratic PAC). Paul Cox had to be corrected when he claimed that there were allegations of fraud against us when that was an entirely different party. (He apologized for his mistake.)
- 19. On July 9, we faced another delay as they continued to investigate these statistically insignificant issues looking for a smoking gun that didn't exist. We were finally approved with a 4-1 vote on July 16, 2024.
- 20. There have been concerning reports of external groups including the plaintiffs and a Democratic PAC called Clear Choice misusing personal information from our petition signers, leading to harassment and misinformation campaigns aimed at undermining our support base. These actions constitute a significant violation of privacy and a distortion of democratic processes.
- 21. We have attended or applied for numerous statewide events including Faith Fourth of July Parade, Pride CLT in Charlotte, and the More Choices More Voices Rally and Packapolooza in Raleigh.
- 22. We have numerous supporters that have filed to have their party affiliation changed to We The People.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Geara Foley

Executed: August 7, 2024

EXHIBIT B – We The People Petition

PETITION TO CREATE A NEW POLITICAL PARTY (NCGS § 163-96 (a)(2))

COUNTY HEREBY PETITION FOR THE FORMATION OF A NEW POLITICAL PARTY TO THE UNDERSIGNED QUALIFIED REGISTERED VOTERS IN

AND WHOSE STATE CHAIRMAN IS __Ceara Foley___, RESIDING AT ___157 Laurel Loop, Asheville NC 28806___, AND WHO BE NAMED ____ We The People ____

CAN BE REACHED BY TELEPHONE AT ____828-263-4808____

IT IS ILLEGAL TO SIGN THE NAME OF ANOTHER PERSON TO A PETITION. (G. S. 163-221)

BOE ONLY	Line No.	Print your name (Must be printed legibly)	Residential street address	ZIP code	Birth date (DD/MM/YYY)	Signature	Today's Date
	-						
	2						
	e						
	4						
	5						
	9						
	7						
	œ						
	6						
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	12						
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	17						
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	19						
	20						
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Board of Elections use only

Batch No

EXHIBIT C – Circulator Instructions (1/12/24)

CIRCULATOR INSTRUCTIONS

NORTH CAROLINA NEW PARTY PETITION

e The People

Party of North Carolina

- Each petition page <u>MUST</u> be printed on 8 ½ x 11" paper, in landscape format NO EXCEPTIONS.
- 2. Each petition may only be signed by voters from the same county. Record the name of the county in the space proved above the blocks reserved for voters to sign their names for the first voter's county who signs each petition. For instance, if the first voter you encounter who signs the petition is from Wake County, record "WAKE" in the space provided on the first line at the top of the petition. THEN, only voters from Wake County may sign this petition page. Use a new/different petition page for voters from other counties.
- 3. You <u>MUST</u> be at least 18 years old to circulate this petition.
- 4. You <u>MUST</u> witness (or watch) each voter as they sign this petition.
- 5. You may NOT misrepresent the purpose of this petition.

The sole purpose of this petition to qualify a new political party in North Carolina – "We The People" Party – to place the name of Robert F. Kennedy Jr. on the 2024 general election ballot as a candidate for the office of President of the United States. You cannot collect a signature by telling a voter the petition is to "Save America" or "Help the Poor."

BE HONEST WITH THE VOTERS.

- 6. Voters <u>MUST</u> use only black or blue ballpoint pens to sign this petition. <u>Do not use gel</u> pens as they can easily smear and result in an invalid signature.
- 7. Only registered voters may sign this petition.

- 8. Each voter must:
 - A. Print their name (First, Middle and Last) as it appears on their voter registration record; and,
 - B. Record their residential address as it appears on their voter registration record; and,
 - C. Record their zip code; and,
 - D. Record their date of birth; and,
 - E. Sign the petition; and,
 - F. Record the date they signed the petition.
- 9. Return <u>ORIGINAL</u> petitions to the campaign. Copies cannot be filed with the counties or the State Board of Elections.

THANK YOU FOR YOUR HARD WORK & HELP !!!

EXHIBIT D – Instructions for Petitioners (1/15/24)

INSTRUCTIONS FOR PETITIONERS

NEW NORTH CAROLINA "WE THE PEOPLE" PARTY PETITION

Purpose: To start a new party "We The People" in North Carolina.

This will allow us to place Robert F. Kennedy, Jr.'s name on the NC ballot for the 2024 Presidential election. To do so, we need to collect 21,000 signatures by May 1st or 1435 a week collectively across NC.

Who can collect signatures?

Any person 18 years old or older. You do *not* have to be registered to vote or live in North Carolina.

How do I get started?

Print the PDF petition sheets from this site: <u>http://tinyurl.com/NC-Party-Petition-Form</u> Each petition sheet <u>must</u> be printed on standard 8.5" x 11" white paper, in landscape format. Get a clipboard and add 5-10 petition sheets to it.

Bring 3-5 blue or black ballpoint pens ONLY – NO gel, felt tip, or any other types of pens! Bring a table and/or chairs if you want for your comfort – just be sure not to obstruct anything

Where do I go to collect signatures?

High traffic spots likely to have a large % of registered voters, especially unaffiliated voters.

1. Anywhere on public property, including:

Public universities (e.g., in free speech areas where others set up tables) Public libraries

Bus stations/transit (but not Amtrak) and rest stops

On sidewalks and areas within 6 feet of any public road

Outside government buildings like the post office or DMV

Public outdoor sporting or other events at K-12 public schools (but not inside)

- 2. Private property including private colleges and nursing homes ONLY IF and AS LONG AS you have verbal permission of the person you reasonably believe to have authority to grant it
- 3. Going door to door single or multi-family homes (but apartment complexes are not allowed)

Note: You are <u>not</u> a solicitor of goods, you are petitioning your government for a redress of grievances - that We the People currently has no ballot access (Reference Marsh vs Alabama - Supreme Court case & <u>see Know Your Petition</u> <u>Rights</u>)

You must <u>not</u> give anything of any monetary value (e.g., buttons, bumper stickers) away while you are petitioning. If you have a table set up, don't put a bowl of candy out or other food, as another example.

How do I ask for people's signatures?

You might break the ice with a friendly hello, "good afternoon," or genuine compliment!

- 1. Ask your intended signer, "Are you registered to vote in NC?"
 - If they're unsure, you can offer to use your or their phone to check voter.org & register if not

2. If they are, then ask "Great, are you willing to sign a petition to form a new party in N.C.?"

Explain why in your own words that $\frac{2}{3}$ of American voters want more choices than the corporate duopoly offers and why they might want to help their fellow citizens have that opportunity etc... You may also explain, "This **party**, "We the **People**" intends to nominate RFK, Jr. as its candidate.

3. Once they agree, ask **"In what county are you registered to vote?"** Write the name of their county at the top of the petition sheet in the first blank space under "**voters in_____ county."** This petition is now designated to

that county. You will need a separate petition sheet for <u>each</u> county. *Do not write anything else on the front of this form.*

Collecting the signatures

You must have an unobstructed view of the person while they sign. NO ONE CAN SIGN FOR ANYONE ELSE OR HELP ANYONE SIGN not a spouse or housemate who says they have permission, nor a person with disabilities who can't fill it out themselves. This constitutes fraud.

Ensuring they are **printing as neatly as possible**, walk them through completing each of the six boxes:

 Name must appear as it does on their voter registration (middle name/initial isn't as important)
 Address box does not need to include city and state (this will help fit the number and street name more legibly). No PO Boxes allowed. MUST BE the address of their residence on voter registration. *Each box must be completed (no "ditto" or arrows pointing to the line above) ie a roommate can not* add " " as their address after their roommate signs

3) Zip code is in its own box

4) Birthdate must be completed in a different order (European style) than we're used to: day/month/4 digit year. This is a common place people mess up and then the signature doesn't count, so be sure to remind them before they start and watch that they do it correctly.

5) They should sign using their usual signature.

6) Today's date can be noted in the normal American format, month/day/year.

If someone makes a mistake, put a single line through their entry. Have them start over on the next line.

How do I turn in my petitions?

Do your best to keep your petition sheets pristine – tears, writing or pen marks that prevent the text from being read clearly could invalidate the whole sheet.

- 1. Print your name on the back of each petition sheet.
- 2. This is so we can ask questions or give feedback if needed and track the signatures you collect.
- 3. Enter your name, county you live in, and total numbers of signatures you collected each week from all sheets you have in your possession on Wednesdays on <u>this Google sheet</u>.
- 4. Take a picture of each sheet for your records. This is in the case of mail fraud or loss.
- 5. Deliver your petitions each Wednesday to your regional coordinator. Delivery can be in person or via team members cooperating via handoffs from far to closer or simply taking turns among local members to deliver them each week.

REGIONAL COORDINATORS INCLUDE:

- Beaufort, Pitt, Craven, Carteret, et al counties: Tadd Herron, taddherron@gmail.com
- New Hanover County/Wilmington area: Kim Bowman, <u>bowmankim17@gmail.com</u>
- Cumberland County/surrounding area: Tam Munar, <u>chrisandtammunar@gmail.com</u>
- Wake, Johnston & surrounding counties: Anthony Noto, <u>anthony.n@teamkennedy.com</u>
- Durham county/area: Donna Dreyer, <u>ddreyer518@gmail.com</u>
- Guilford, Forsyth Cos/Greensboro area: Donya Lucas <u>donyalucas@hotmail.com</u>
- Mecklenburg County/Charlotte area:Heidi Aldinger, <u>Heidi.Aldinger@gmail.com</u>
- Buncombe and WNC counties: Beth Baldino, <u>beth@kennedync.org</u>

Sample Signature Collecting Scripts:

#1 "Excuse me miss/sir/folks, sorry to bother/interrupt. Are you registered to vote in North Carolina? We are creating a new independent 3rd party called We The People to put Robert F Kennedy Jr on the ballot in November. He is running as an independent for the office of president. Are you familiar with him? We require about 13,700 signatures in NC to get him on the ballot. Would you be willing to sign to allow us a real choice this November?

#2 ".... Would you like to sign a petition to get more options on the ballot this November? We are gathering signatures to start a new party in NC called We The People. This will allow us to place the people's candidate on the ballot for all future elections once established. Would you be willing to sign to allow us a real choice this November? There is no obligation on your part. It's just a pathway for the independent choice." If they ask then... "This year the party plans to nominate independent candidate Robert F Kennedy Jr. for president"

If asked what does <u>"We The People"</u> party stand for? Sample answer: The party stands as a declaration of democracy, asserting that power comes from the collective will of the citizens. It will concern itself with issues every citizen agrees: reducing chronic illness & pollution, wholesome food supply, preserving the environment, government honesty, freedom of expression, & etc. <u>Reference this video & text</u>.

<u>Find your own voice & what works best for you!</u> We suggest having some flyers/pamphlets handy to pass out to people that need to learn more. <u>Here is a link to one you can print (double sided) & trifold</u>.

Sample Places to Canvas or Collect Signatures:

- Door to door
- Big box store parking lots, like Costco or Super Walmart on weekends (stay away from entrance)
- State or city parks; Public libraries (outside); DMV (outside)
- State colleges/universities/tech schools (these usually need a student sponsor & approval)
- Farmers Market parking lots; Craft shows & flea markets
- Search the internet for events in your area (Parades, Shows, etc.)
- Theater & Sporting events (outside); Running events (runningintheusa.com)

Anyplace that has good people traffic and where you are not interfering with commerce. If you can get ~ 10 signatures an hour you are in a good spot & should stick with whatever works for you.

Be prepared-

If the event is on public grounds and "open to the public" meaning they don't charge admittance then it is absolutely within your legal right to petition under your second amendment rights via Marsh vs Alabama. We are not campaigning. So you could definitely be outside without any Kennedy gear and ask if folks would like to sign a petition to get another option on the ballot and be lawfully in the right. It is not frequent, but it can happen that you will be challenged. See & print "Know Your Petition Rights".

Events: Search for planned events you can join and/or post your own on both the <u>NC 4 Kennedy Facebook</u> group and on <u>Kennedy24.com</u>

Kennedy Gear & Merch: https://merch.kennedy24.com/; www.amazon.com; www.etsy.com

EXHIBIT E.1 – Petition Signers Declarations

I, _____, a registered voter residing at _____, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Aaron Russell

Date

Final Audit Report

2024-06-25

By: Status:	Ryan Rabah (ryanrabah@gmail.com) Signed	
	and the second	
Transaction ID:	CBJCHBCAABAAt7NmtKFH3u3WWp12C9EpIQs3RLq4xWxF	

- "WTPNC Signer Declaration Adobe" History
- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 4:54:01 AM GMT- IP address: 63.238.183.186
- Document emailed to Aaron Russell (im.aaronr@gmail.com) for signature 2024-06-25 - 4:54:04 AM GMT
- Email viewed by Aaron Russell (im.aaronr@gmail.com) 2024-06-25 - 4:01:21 PM GMT- IP address: 66.249.88.5
- Document e-signed by Aaron Russell (im.aaronr@gmail.com) Signature Date: 2024-06-25 - 4:10:45 PM GMT - Time Source: server- IP address: 136.57.8.242
- Agreement completed. 2024-06-25 - 4:10:45 PM GMT

I, <u>Alex Martin</u>, a registered voter residing at <u>934 Arbor Ln Sanford, NC 27330</u>, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Alex Martin (Jun 25, 2024 12:19 EDT)

Date

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAIpcGBeJGEd6d937m_SMGM8I_2k-AL4da	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 3:42:23 PM GMT- IP address: 136.57.153.155
- Document emailed to Alex Martin (avhaislip@gmail.com) for signature 2024-06-25 - 3:42:27 PM GMT
- Email viewed by Alex Martin (avhaislip@gmail.com) 2024-06-25 - 4:17:41 PM GMT- IP address: 172.226.196.8
- Document e-signed by Alex Martin (avhaislip@gmail.com) Signature Date: 2024-06-25 - 4:19:53 PM GMT - Time Source: server- IP address: 174.206.34.37
- Agreement completed. 2024-06-25 - 4:19:53 PM GMT

I, ______, a registered voter residing at 355 N Ashe Street, Southern Pines, NC 28387 _____, hereby make this declaration regarding my signature on the petition for the We

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Date

Final Audit Report

2024-06-25

Created:	2024-06-25
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAATHCAvtXKjhQosxI_oyuSagbdnrXZiRF4

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:21:35 PM GMT- IP address: 136.57.153.155
- Document emailed to Alice Dubroff (aamerdub@gmail.com) for signature 2024-06-25 - 2:21:38 PM GMT
- Email viewed by Alice Dubroff (aamerdub@gmail.com) 2024-06-25 - 2:22:02 PM GMT- IP address: 66.249.88.2
- Document e-signed by Alice Dubroff (aamerdub@gmail.com) Signature Date: 2024-06-25 - 2:25:35 PM GMT - Time Source: server- IP address: 172.74.141.190
- Agreement completed. 2024-06-25 - 2:25:35 PM GMT

I, ______, a registered voter residing at _____, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Amanda S Earnhardt

Date

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAqUv0HRwruM2Ay1VArGvulEu9gg7KFktu	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 1:56:04 PM GMT- IP address: 136.57.153.155
- Document emailed to Mandy Earnhardt (mandy@marketandmeeting.org) for signature 2024-06-25 - 1:56:07 PM GMT
- Email viewed by Mandy Earnhardt (mandy@marketandmeeting.org) 2024-06-25 - 1:56:12 PM GMT- IP address: 66.249.88.2
- Signer Mandy Earnhardt (mandy@marketandmeeting.org) entered name at signing as Amanda S. Earnhardt 2024-06-25 2:01:01 PM GMT- IP address: 66.248.74.82
- Document e-signed by Amanda S. Earnhardt (mandy@marketandmeeting.org) Signature Date: 2024-06-25 - 2:01:03 PM GMT - Time Source: server- IP address: 66.248.74.82
- Agreement completed. 2024-06-25 - 2:01:03 PM GMT

I, ______, a registered voter residing at 6403 Hidden Lake Loop Apt 7 Fayetteville NC 28304 _____, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Date

Jun 25, 2024 12:09 EDT

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA7CQI7iCBmNEp_YJqVe8UfyluWE891el8	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 3:33:41 PM GMT- IP address: 136.57.153.155
- Document emailed to Annette Famma (anca820@gmail.com) for signature 2024-06-25 - 3:33:44 PM GMT
- Email viewed by Annette Famma (anca820@gmail.com) 2024-06-25 - 4:08:24 PM GMT- IP address: 66.249.88.1
- Signer Annette Famma (anca820@gmail.com) entered name at signing as Annette Fama 2024-06-25 - 4:09:55 PM GMT- IP address: 172.58.250.72
- Document e-signed by Annette Fama (anca820@gmail.com) Signature Date: 2024-06-25 - 4:09:57 PM GMT - Time Source: server- IP address: 172.58.250.72
- Agreement completed. 2024-06-25 - 4:09:57 PM GMT

I, ______, a registered voter residing at 2831 Marcus James Dr, Fayetteville, NC, 28306 _____, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Ben Vonderheide

Date

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA58ZEIIFSpp2NGs-UgyxIQqXmP-nGKeCT	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 3:33:02 PM GMT- IP address: 136.57.153.155
- Document emailed to Ben Vonderheide (benvonderheide@yahoo.com) for signature 2024-06-25 - 3:33:05 PM GMT
- Email viewed by Ben Vonderheide (benvonderheide@yahoo.com) 2024-06-25 - 3:58:40 PM GMT- IP address: 140.248.0.0
- Document e-signed by Ben Vonderheide (benvonderheide@yahoo.com) Signature Date: 2024-06-25 - 4:02:29 PM GMT - Time Source: server- IP address: 140.248.0.0
- Agreement completed. 2024-06-25 - 4:02:29 PM GMT

I, Caroline Feehan	, a registered voter residing at
9 Park Dr, Weaverville NC	, hereby
make this declaration rega	rding my signature on the petition for the We

The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

24/06/24

Date

Final Audit Report

2024-06-25

Created:	2024-06-25	
Ву:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAUpURTmxZ1MjJ1kq3L1MctTuAlYhPPTUN	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:32:35 AM GMT- IP address: 64.158.217.230
- Document emailed to Caroline Feehan (carebearnc@gmail.com) for signature 2024-06-25 - 2:32:38 AM GMT
- Email viewed by Caroline Feehan (carebearnc@gmail.com) 2024-06-25 - 2:37:10 AM GMT- IP address: 66.249.84.70
- Document e-signed by Caroline Feehan (carebearnc@gmail.com) Signature Date: 2024-06-25 - 2:38:08 AM GMT - Time Source: server- IP address: 96.37.216.68
- Agreement completed. 2024-06-25 - 2:38:08 AM GMT

I, <u>Carole A. McGoldrick</u>, a registered voter residing at 3546 W. Legacy Park Dr. Southport NC 28461 , hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

GAL N'GIERNICK (Jun 25, 2024 11:10 EDT)

Date

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAArfP6VThmY_JupYQmR9a9_Behv0-PvfDn	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:08:05 PM GMT- IP address: 136.57.153.155
- Document emailed to Carole A. McGoldrick (mcrickgold@triad.rr.com) for signature 2024-06-25 - 2:08:09 PM GMT
- Email viewed by Carole A. McGoldrick (mcrickgold@triad.rr.com) 2024-06-25 - 2:43:32 PM GMT- IP address: 172.225.248.162
- Document e-signed by Carole A. McGoldrick (mcrickgold@triad.rr.com) Signature Date: 2024-06-25 - 3:10:51 PM GMT - Time Source: server- IP address: 209.188.33.174
- Agreement completed. 2024-06-25 - 3:10:51 PM GMT

I, <u>Cate Pomelow</u>, a registered voter residing at <u>Cate Pomelow</u>, hereby make this declaration regarding my signature on the petition for the We

The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Date

am (Jun 25, 2024 11:00 EDT)

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAjhTOu9CqANMIXZoWVaw-f_O3kW10ehms	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:40:46 AM GMT- IP address: 64.158.217.230
- Document emailed to Cate Pomelow (cate.pomelow@gmail.com) for signature 2024-06-25 - 2:40:49 AM GMT
- Email viewed by Cate Pomelow (cate.pomelow@gmail.com) 2024-06-25 - 2:40:56 AM GMT- IP address: 66.102.8.70
- Document e-signed by Cate Pomelow (cate.pomelow@gmail.com) Signature Date: 2024-06-25 - 3:00:52 PM GMT - Time Source: server- IP address: 149.154.44.31
- Agreement completed. 2024-06-25 - 3:00:52 PM GMT

I, _____ David Earl Tomlinson

11 1/2 Park Ave N Asheville NC 28801

, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

24/06/24

Date

Jun 24, 2024 22:36 EDT)

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAArQLXEdXaLKmpiNJuJDHc15w8Ucd4ddNI	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:33:26 AM GMT- IP address: 64.158.217.230
- Document emailed to David Earl Tomlinson (dtfilament@yahoo.com) for signature 2024-06-25 - 2:33:28 AM GMT
- Email viewed by David Earl Tomlinson (dtfilament@yahoo.com) 2024-06-25 - 2:35:20 AM GMT- IP address: 69.147.93.136
- Document e-signed by David Earl Tomlinson (dtfilament@yahoo.com) Signature Date: 2024-06-25 - 2:36:40 AM GMT - Time Source: server- IP address: 71.11.33.134
- Agreement completed. 2024-06-25 - 2:36:40 AM GMT

I, Elana Kann Asheville, NC _____, a registered voter residing at make this declaration regarding my signature on the solition for the MA

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Date

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAL-IR72_EX27w4R82JxVFtG4-FfZAyMVS	

"WTPNC Signer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:06:05 AM GMT- IP address: 64.158.217.230
- Document emailed to Elana Kann (elanakann@gmail.com) for signature 2024-06-25 - 2:06:08 AM GMT
- Email viewed by Elana Kann (elanakann@gmail.com) 2024-06-25 - 12:05:57 PM GMT- IP address: 66.249.84.67
- Signer Elana Kann (elanakann@gmail.com) entered name at signing as Elana Kann 2024-06-25 - 12:09:14 PM GMT- IP address: 68.189.173.14
- Document e-signed by Elana Kann (elanakann@gmail.com) Signature Date: 2024-06-25 - 12:09:16 PM GMT - Time Source: server- IP address: 68.189.173.14

Agreement completed. 2024-06-25 - 12:09:16 PM GMT

I, ______, a registered voter residing at 775 chalk maple rd china grove nc ______, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Ethan Morton (Jun 25, 2024 12:36 EDT)

Date

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAt1qrYPaLiwgTMPzuuHeQtkXWAhxe5RrJ	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:15:37 AM GMT- IP address: 64.158.217.230
- Document emailed to Ethan Morton (etmorton6501@gmail.com) for signature 2024-06-25 2:15:40 AM GMT
- Email viewed by Ethan Morton (etmorton6501@gmail.com) 2024-06-25 - 12:45:06 PM GMT- IP address: 66.102.8.64
- Document e-signed by Ethan Morton (etmorton6501@gmail.com) Signature Date: 2024-06-25 - 4:36:08 PM GMT - Time Source: server- IP address: 174.238.101.22
- Agreement completed. 2024-06-25 - 4:36:08 PM GMT

I, <u>Gina G. Mosko</u>, a registered voter residing at <u>506 Dodge Street, Kannapolis NC</u>, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Gina G. Mosko

Date

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAokIn5Jps3_TQJj2Y3hTFayGJfbEZJsq9	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:11:39 AM GMT- IP address: 64.158.217.230
- Document emailed to Gina mosko (alleghenies32@hotmail.com) for signature 2024-06-25 - 2:11:45 AM GMT
- Email viewed by Gina mosko (alleghenies32@hotmail.com) 2024-06-25 - 2:29:33 AM GMT- IP address: 172.224.237.43
- Signer Gina mosko (alleghenies32@hotmail.com) entered name at signing as Gina G. Mosko 2024-06-25 - 8:35:04 AM GMT- IP address: 65.184.68.152
- Document e-signed by Gina G. Mosko (alleghenies32@hotmail.com) Signature Date: 2024-06-25 - 8:35:06 AM GMT - Time Source: server- IP address: 65.184.68.152
- Agreement completed. 2024-06-25 - 8:35:06 AM GMT

I, ______, a registered voter residing at 318 Northwest Drive, Davidson, NC ______, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Date

Jade Rabah (Jun 25, 2024 (9:45 EDT)

Final Audit Report

2024-06-25

Created:	2024-06-25
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAVQkJjlVDTo_n4QuY5vaVrxM0XcpGYQRH

"WTPNC Signer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:29:46 AM GMT- IP address: 64.158.217.230
- Document emailed to Jade Rabah (jaderabah6@gmail.com) for signature 2024-06-25 2:29:49 AM GMT
- Email viewed by Jade Rabah (jaderabah6@gmail.com) 2024-06-25 - 12:44:28 PM GMT- IP address: 66.249.88.1
- Document e-signed by Jade Rabah (jaderabah6@gmail.com) Signature Date: 2024-06-25 - 12:45:39 PM GMT - Time Source: server- IP address: 136.57.153.155
- Agreement completed. 2024-06-25 - 12:45:39 PM GMT

🚴 Adobe Acrobat Sign

I, ______, a registered voter residing at 318 Northwest Dr. Davidson NC 28036 ______, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Date

Jun 25, 2024 06:45 EDTI

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA5kl2SO8QcZSL6W51Po600yM_jxPravCm	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:29:08 AM GMT- IP address: 64.158.217.230
- Document emailed to Jamie Horowitz (jamie.t.horowitz@nccourts.org) for signature 2024-06-25 2:29:11 AM GMT
- Email viewed by Jamie Horowitz (jamie.t.horowitz@nccourts.org) 2024-06-25 - 3:12:53 AM GMT- IP address: 104.28.57.244
- Document e-signed by Jamie Horowitz (jamie.t.horowitz@nccourts.org) Signature Date: 2024-06-25 - 10:45:10 AM GMT - Time Source: server- IP address: 107.210.118.6
- Agreement completed. 2024-06-25 - 10:45:10 AM GMT

John Pomelow

I, _____, a registered voter residing at 424 Brightwood Drive, Fayetteville, NC 28303 _____, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

John Port ow (Jun 25, 2024 11:00 EDT)

Date

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAgsZ3KCMBTAINZnrWBsT84AcRy9scAH_U	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:41:27 AM GMT- IP address: 64.158.217.230
- Document emailed to John Pomelow (john.pomelow@gmail.com) for signature 2024-06-25 2:41:30 AM GMT
- Email viewed by John Pomelow (john.pomelow@gmail.com) 2024-06-25 - 2:44:17 AM GMT- IP address: 66.102.8.69
- Document e-signed by John Pomelow (john.pomelow@gmail.com) Signature Date: 2024-06-25 - 3:00:42 PM GMT - Time Source: server- IP address: 12.74.212.74
- Agreement completed. 2024-06-25 - 3:00:42 PM GMT

Joseph Smith

I, _____, a registered voter residing at 125 Horseshoe Rd, Southern Pines NC 28387 _____, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Date

(Jun 25, 2024 11:39 EDT)

Final Audit Report

2024-06-25

Created:	2024-06-25
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAdHg7IW6xWejyiSJdRm6F5E0z5wwWgx

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 3:37:24 PM GMT- IP address: 136.57.153.155
- Document emailed to Joseph Smith (josephanatolysmith@gmail.com) for signature 2024-06-25 - 3:37:27 PM GMT
- Email viewed by Joseph Smith (josephanatolysmith@gmail.com) 2024-06-25 - 3:37:36 PM GMT- IP address: 66.249.88.3
- Document e-signed by Joseph Smith (josephanatolysmith@gmail.com) Signature Date: 2024-06-25 - 3:39:17 PM GMT - Time Source: server- IP address: 76.36.161.5
- Agreement completed. 2024-06-25 - 3:39:17 PM GMT

Julie Cochrane

I, _____, a registered voter residing at 105 Appalachian Way, Asheville, NC 28806 _____, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

24/06/24

Date

ne (Jun 24, 2024 22:36 EDT)

Final Audit Report

2024-06-25

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Created:	2024-06-25	
Ву:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAEsdSfWqom45KyhO2sMtW9b37rUkd6Nh6	

"WTPNC Signer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:34:13 AM GMT- IP address: 64.158.217.230
- Document emailed to Julie Cochrane (leggs79@gmail.com) for signature 2024-06-25 2:34:16 AM GMT
- Email viewed by Julie Cochrane (leggs79@gmail.com) 2024-06-25 - 2:34:25 AM GMT- IP address: 66.249.84.66
- Document e-signed by Julie Cochrane (leggs79@gmail.com)
 Signature Date: 2024-06-25 2:36:12 AM GMT Time Source: server- IP address: 97.82.236.101
- Agreement completed. 2024-06-25 - 2:36:12 AM GMT

🚴 Adobe Acrobat Sign

I, Leigh Heather Wilson , a registered voter residing at Durham, North Carolina , hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

24/06/24

Date

24. 2024 22:12 EDT)

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAExGjx0Pe8vMbBpKBnKKAhg04ZQI56eVf	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:08:32 AM GMT- IP address: 64.158.217.230
- Document emailed to Heather Wilson (I.heather.wilson@gmail.com) for signature 2024-06-25 - 2:08:36 AM GMT
- Email viewed by Heather Wilson (I.heather.wilson@gmail.com) 2024-06-25 - 2:10:12 AM GMT- IP address: 104.28.39.161
- Signer Heather Wilson (I.heather.wilson@gmail.com) entered name at signing as Leigh Heather Wilson 2024-06-25 - 2:12:51 AM GMT- IP address: 140.248.22.1
- Document e-signed by Leigh Heather Wilson (I.heather.wilson@gmail.com) Signature Date: 2024-06-25 - 2:12:53 AM GMT - Time Source: server- IP address: 140.248.22.1
- Agreement completed. 2024-06-25 - 2:12:53 AM GMT

I, Leslie Howard _____, a registered voter residing at 506 dodge st kannapolis nc ______, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Date

Howard (Jun 25, 2024 10:11 EDT)

Final Audit Report

2024-06-25

Created:	2024-06-25
Ву:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA_qJFza-fF4lj3VhCDHjzREF-smPBpgOA

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:10:00 AM GMT- IP address: 64.158.217.230
- Document emailed to Leslie Howard (lesliebhoward3@gmail.com) for signature 2024-06-25 2:10:03 AM GMT
- Email viewed by Leslie Howard (lesliebhoward3@gmail.com) 2024-06-25 - 2:08:05 PM GMT- IP address: 66.249.88.5
- Document e-signed by Leslie Howard (lesliebhoward3@gmail.com) Signature Date: 2024-06-25 - 2:11:21 PM GMT - Time Source: server- IP address: 174.210.67.138
- Agreement completed. 2024-06-25 - 2:11:21 PM GMT

Michele Zapple

I, _____, a registered voter residing at 321 RL Honeycutt Drive Wilmington, NC 28412 _____, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

24/06/24

Date

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAAnPIIZkUx_MS5UmJNnyFmeUA5OdP22u4	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:44:37 AM GMT- IP address: 64.158.217.230
- Document emailed to Michele Zapple (michelezapple@yahoo.com) for signature 2024-06-25 - 2:44:40 AM GMT
- Email viewed by Michele Zapple (michelezapple@yahoo.com) 2024-06-25 - 2:54:57 AM GMT- IP address: 209.73.183.23
- Signer Michele Zapple (michelezapple@yahoo.com) entered name at signing as Michele Zapple 2024-06-25 - 2:57:54 AM GMT- IP address: 174.247.4.1
- Document e-signed by Michele Zapple (michelezapple@yahoo.com) Signature Date: 2024-06-25 - 2:57:56 AM GMT - Time Source: server- IP address: 174.247.4.1
- Agreement completed. 2024-06-25 - 2:57:56 AM GMT

Molly Mills

I, _____, a registered voter residing at 40 Blue Ridge Development Rd, Fairview, NC 28730 , hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Date

MATHER 125, 2024 00;24 EDT)

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA5UOeYHPEooXqlFHPDykSt9xtESWiRYot	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:20:18 AM GMT- IP address: 64.158.217.230
- Document emailed to Molly Mills (molly.mills1@gmail.com) for signature 2024-06-25 - 2:20:21 AM GMT
- Email viewed by Molly Mills (molly.mills1@gmail.com) 2024-06-25 - 4:02:54 AM GMT- IP address: 97.82.194.44
- Document e-signed by Molly Mills (molly.mills1@gmail.com) Signature Date: 2024-06-25 - 4:24:00 AM GMT - Time Source: server- IP address: 97.82.194.44
- Agreement completed. 2024-06-25 - 4:24:00 AM GMT

Patricia Williams

I, _____, a registered voter residing at 4235 Ferncreek Drive, Fayetteville, NC 28314 , hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Date

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAv1dyv-nNS81pAoVEHig-G_toKA5MKQXB	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:39:04 AM GMT- IP address: 64.158.217.230
- Document emailed to Patricia Williams (patwilliamsnc@aol.com) for signature 2024-06-25 2:39:07 AM GMT
- Email viewed by Patricia Williams (patwilliamsnc@aol.com) 2024-06-25 - 12:41:23 PM GMT- IP address: 209.73.183.60
- Document e-signed by Patricia Williams (patwilliamsnc@aol.com) Signature Date: 2024-06-25 - 12:45:06 PM GMT - Time Source: server- IP address: 174.110.207.36
- Agreement completed. 2024-06-25 - 12:45:06 PM GMT

Rachel E. McGoldrick

I, _____, a registered voter residing at 5215 Autumn Woods Dr. Greensboro, NC 27407 , hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Date

Rachel E. McGoldrick

Final Audit Report

2024-06-25

Created:	2024-06-25
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAqsqs-r1WcHfO1EN9Rs_2P4FHqnBprCpc

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:06:45 PM GMT- IP address: 136.57.153.155
- Document emailed to Rachel E. McGoldrick (mcgoldr77@gmail.com) for signature 2024-06-25 - 2:06:48 PM GMT
- Email viewed by Rachel E. McGoldrick (mcgoldr77@gmail.com) 2024-06-25 - 2:06:51 PM GMT- IP address: 72.14.199.2
- Document e-signed by Rachel E. McGoldrick (mcgoldr77@gmail.com) Signature Date: 2024-06-25 - 2:07:59 PM GMT - Time Source: server- IP address: 108.91.127.45
- Agreement completed. 2024-06-25 - 2:07:59 PM GMT

I, ______, a registered voter residing at 6437 Rhemish Drive Fayetteville NC 28304 ______, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Date

ba (Jun 25, 2024 12:04 EDT)

Final Audit Report

2024-06-25

Created:	2024-06-25	
Ву:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAmkcL8lgO_QimB70ut6iX923qimoz_y9G	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 3:55:25 PM GMT- IP address: 136.57.153.155
- Document emailed to Raymond Vrba (tankrollins65@aol.com) for signature 2024-06-25 3:55:28 PM GMT
- Email viewed by Raymond Vrba (tankrollins65@aol.com) 2024-06-25 - 4:00:03 PM GMT- IP address: 69.147.93.12
- Document e-signed by Raymond Vrba (tankrollins65@aol.com) Signature Date: 2024-06-25 - 4:04:52 PM GMT - Time Source: server- IP address: 174.247.1.145
- Agreement completed. 2024-06-25 - 4:04:52 PM GMT

Shawn Keough

I, _____, a registered voter residing at 2211 Lake Forest Dr., High Point, NC 27265 ____, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Date

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA3J_IziLE_m4fmr4JDMIQ_01hsbx0mvWE	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 1:18:11 PM GMT- IP address: 136.57.153.155
- Document emailed to Shawn Keough (kayakkeough@gmail.com) for signature 2024-06-25 1:18:15 PM GMT
- Email viewed by Shawn Keough (kayakkeough@gmail.com) 2024-06-25 - 1:18:17 PM GMT- IP address: 72.14.199.4
- Document e-signed by Shawn Keough (kayakkeough@gmail.com) Signature Date: 2024-06-25 - 2:37:13 PM GMT - Time Source: server- IP address: 174.203.245.171
- Agreement completed. 2024-06-25 - 2:37:13 PM GMT

Sheryl Syence

I, ______, a registered voter residing at 21 Allesarn Road, Asheville, NC 28804 ______, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

24/06/24

Sheryl Syence (Jun 24, 2024 23:0

Date

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAABUP0aYRIoQDes1YKCzjTBQznPlrQMQjl	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:46:57 AM GMT- IP address: 64.158.217.230
- Document emailed to Sherry Syence (syence.thompson@gmail.com) for signature 2024-06-25 - 2:46:59 AM GMT
- Email viewed by Sherry Syence (syence.thompson@gmail.com) 2024-06-25 - 2:47:56 AM GMT- IP address: 66.249.84.70
- Signer Sherry Syence (syence.thompson@gmail.com) entered name at signing as Sheryl Syence 2024-06-25 - 3:00:18 AM GMT- IP address: 96.37.20.174
- Document e-signed by Sheryl Syence (syence.thompson@gmail.com) Signature Date: 2024-06-25 - 3:00:20 AM GMT - Time Source: server- IP address: 96.37.20.174
- Agreement completed. 2024-06-25 - 3:00:20 AM GMT

I, ______, a registered voter residing at ______, a registered voter residing at ______, hereby ______, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

and (Jun 25, 2024 06:19 EDT)

Date

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAARTdP-bOHNU0xVN1VZNEc-I-u5QxEgq1g	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:31:06 AM GMT- IP address: 64.158.217.230
- Document emailed to Stephanie McClelland (sgpmmc@hotmail.com) for signature 2024-06-25 - 2:31:09 AM GMT
- Email viewed by Stephanie McClelland (sgpmmc@hotmail.com) 2024-06-25 - 10:16:41 AM GMT- IP address: 12.74.54.79
- Document e-signed by Stephanie McClelland (sgpmmc@hotmail.com) Signature Date: 2024-06-25 - 10:19:45 AM GMT - Time Source: server- IP address: 12.74.54.79
- Agreement completed. 2024-06-25 - 10:19:45 AM GMT

I, <u>Trent Lord</u>, a registered voter residing at 3050 airport rd Salisbury, nc 28147, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Date

d (Jun 25, 2024 12:04 EDT)

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAT1HIgEKydDB2zeGTBE0Im_M7WBeUC9jm	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 2:14:30 AM GMT- IP address: 64.158.217.230
- Document emailed to Trent Lord (trentlord@icloud.com) for signature 2024-06-25 - 2:14:33 AM GMT
- Email viewed by Trent Lord (trentlord@icloud.com) 2024-06-25 - 2:26:54 AM GMT- IP address: 104.28.77.146
- Document e-signed by Trent Lord (trentlord@icloud.com) Signature Date: 2024-06-25 - 4:04:38 PM GMT - Time Source: server- IP address: 172.58.250.113
- Agreement completed. 2024-06-25 - 4:04:38 PM GMT

I, _____, a registered voter residing at 9 Park Drive, Weaverville, NC _____, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

24/06/24

Date

24, 2024 22:41 EDT)

Final Audit Report

2024-06-25

Created:	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAeYMXC6Tuk-oEa6P-G_WAIrUKbEgu2Pvi	

"WTPNC Signer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 2:31:48 AM GMT- IP address: 64.158.217.230
- Document emailed to Will Feehan (willfeehan@gmail.com) for signature 2024-06-25 - 2:31:51 AM GMT
- Email viewed by Will Feehan (willfeehan@gmail.com) 2024-06-25 - 2:33:09 AM GMT- IP address: 66.249.84.66
- Document e-signed by Will Feehan (willfeehan@gmail.com) Signature Date: 2024-06-25 - 2:41:50 AM GMT - Time Source: server- IP address: 96.37.216.68
- Agreement completed. 2024-06-25 - 2:41:50 AM GMT

Adobe Acrobat Sign

Melissa Frey

, a registered voter residing at 738 Castle Rock Farm Rd, Pittsboro, NC 27312 , hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

08/07/24

Melissa Frey Melissa Frey Mal 8, 2024 (2000 FDT)

Date

Final Audit Report

2024-07-08

Created:	2024-07-08	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAARWzU7FT4CA-rCu5XWDNQgIOZWmbVJE3Z	

"WTPNC Signer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-08 - 1:50:40 PM GMT- IP address: 136.57.153.155
- Document emailed to Melissa Frey (melkmf2@gmail.com) for signature 2024-07-08 - 1:50:43 PM GMT
- Email viewed by Melissa Frey (melkmf2@gmail.com) 2024-07-08 - 6:58:21 PM GMT- IP address: 66.249.83.34
- Document e-signed by Melissa Frey (melkmf2@gmail.com) Signature Date: 2024-07-08 - 7:00:00 PM GMT - Time Source: server- IP address: 71.217.79.33
- Agreement completed. 2024-07-08 - 7:00:00 PM GMT

🚴 Adobe Acrobat Sign

Adam Sherrill

I, _____, a registered voter residing at

, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People. Adam Sherrill
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

08/07/24

Date

n Shemill 13:40 FDT)

Final Audit Report

2024-07-08

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAkSf_sGJytoa9MKmL0JkE0LJq231I1CUL	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:45:11 PM GMT- IP address: 136.57.153.155
- Document emailed to Adam Sherrill (asherrill115@yahoo.com) for signature 2024-07-06 7:45:13 PM GMT
- Email viewed by Adam Sherrill (asherrill115@yahoo.com) 2024-07-06 - 7:50:18 PM GMT- IP address: 69.147.90.62
- Document e-signed by Adam Sherrill (asherrill115@yahoo.com) Signature Date: 2024-07-08 - 5:40:06 PM GMT - Time Source: server- IP address: 75.39.181.236
- Agreement completed. 2024-07-08 - 5:40:06 PM GMT

I, Kevin Hennessey , a registered voter residing at Kjh , hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

08/07/24

Date

24 12:20 EDT)

Final Audit Report

2024-07-08

Created:	2024-07-07
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAjxqc8aiFJL666XJ0ag3JQuKyMp_NUV94

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-07 - 4:41:15 PM GMT- IP address: 136.57.153.155
- C. Document emailed to Kevin Hennessey (hennesseyk54@gmail.com) for signature 2024-07-07 - 4:41:18 PM GMT
- Email viewed by Kevin Hennessey (hennesseyk54@gmail.com) 2024-07-07 - 4:41:23 PM GMT- IP address: 66.249.88.164
- Document e-signed by Kevin Hennessey (hennesseyk54@gmail.com) Signature Date: 2024-07-08 - 4:20:45 PM GMT - Time Source: server- IP address: 47.135.68.60
- Agreement completed. 2024-07-08 - 4:20:45 PM GMT

I. Lumini Merced

I, _____, a registered voter residing at 290 Hidden Creek Road, Boone, NC 28607 _____, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

08/07/24

Date

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Final Audit Report

2024-07-08

Created:	2024-07-08
	2024-07-08
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAASIG8i-DrWaAvdLV1HKsneFJ7DU3sA_bK

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-08 - 1:52:39 PM GMT- IP address: 136.57.153.155
- Document emailed to Lumini Merced (luminimerced@indylink.org) for signature 2024-07-08 - 1:52:42 PM GMT
- Email viewed by Lumini Merced (luminimerced@indylink.org) 2024-07-08 - 3:19:40 PM GMT- IP address: 193.160.100.102
- Document e-signed by Lumini Merced (luminimerced@indylink.org) Signature Date: 2024-07-08 - 3:23:03 PM GMT - Time Source: server- IP address: 193.160.100.102
- Agreement completed. 2024-07-08 - 3:23:03 PM GMT

I, _____, a registered voter residing at 1595 Angels Way Lane. Horseshoe, NC. 28742 , hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

08/07/24

Honin Gal 8, 2024 11:08 EDT)

Date

Final Audit Report

2024-07-08

Created:	2024-07-08	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAps4jBRubtXwudZHvU2k2ybYtbJEO16Qp	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-08 - 1:49:49 PM GMT- IP address: 136.57.153.155
- Document emailed to Karen Cash (karencash@bellsouth.net) for signature 2024-07-08 - 1:49:52 PM GMT
- Email viewed by Karen Cash (karencash@bellsouth.net) 2024-07-08 - 3:06:29 PM GMT- IP address: 146.75.222.1
- Document e-signed by Karen Cash (karencash@bellsouth.net) Signature Date: 2024-07-08 - 3:08:52 PM GMT - Time Source: server- IP address: 172.58.254.145
- Agreement completed. 2024-07-08 - 3:08:52 PM GMT

I, ______, a registered voter residing at 3308 Hebron Rd Hendersonville NC 28739 _____, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

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entitler	Bielowicz (Jul 8, 2	024 10:36 EL	(TC	

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Final Audit Report

2024-07-08

Created:	2024-07-08	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAd6R01uXk4va3QF7R65yRnUlrbRMhFiiY	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-08 - 1:55:26 PM GMT- IP address: 136.57.153.155
- Document emailed to Jennifer Bielowicz (jenbielowicz@gmail.com) for signature 2024-07-08 - 1:55:28 PM GMT
- Email viewed by Jennifer Bielowicz (jenbielowicz@gmail.com) 2024-07-08 - 2:32:55 PM GMT- IP address: 66.249.84.71
- Document e-signed by Jennifer Bielowicz (jenbielowicz@gmail.com) Signature Date: 2024-07-08 - 2:36:22 PM GMT - Time Source: server- IP address: 67.44.208.89
- Agreement completed. 2024-07-08 - 2:36:22 PM GMT

I, ______, a registered voter residing at 113 Gregory Drive, Cary, NC 27513 ______, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

08/07/24

Date

oshua Grove

Final Audit Report

2024-07-08

Created:	2024-07-07	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAvkOBkN3Gi5B4Mb3dTavW0fSkuwbryt4U	

"WTPNC Signer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-07 - 4:27:18 PM GMT- IP address: 136.57.153.155
- Document emailed to Joshua Grove (riotstickers13@gmail.com) for signature 2024-07-07 4:27:20 PM GMT
- Email viewed by Joshua Grove (riotstickers13@gmail.com) 2024-07-08 - 1:51:01 PM GMT- IP address: 66.249.88.164
- Document e-signed by Joshua Grove (riotstickers13@gmail.com) Signature Date: 2024-07-08 - 1:53:30 PM GMT - Time Source: server- IP address: 69.220.156.29
- Agreement completed. 2024-07-08 - 1:53:30 PM GMT

🚴 Adobe Acrobat Sign

I, _____, a registered voter residing at 12 Windcrush Court Greensboro NC 27455 _____, hereby make this declaration regarding my signature on the petition for the We

I state the following:

The People party in North Carolina.

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

08/07/24

Date

Final Audit Report

2024-07-08

Created:	2024-07-07	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAyBzX50_AoZHhIIzXjTcRgwrWwxnuqWdj	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-07 - 4:26:32 PM GMT- IP address: 136.57.153.155
- Document emailed to Kevin Murray (tjbsummerfield@gmail.com) for signature 2024-07-07 - 4:26:35 PM GMT
- Email viewed by Kevin Murray (tjbsummerfield@gmail.com) 2024-07-08 - 1:37:57 PM GMT- IP address: 66.249.80.33
- Document e-signed by Kevin Murray (tjbsummerfield@gmail.com) Signature Date: 2024-07-08 - 1:39:56 PM GMT - Time Source: server- IP address: 70.130.176.124
- Agreement completed. 2024-07-08 - 1:39:56 PM GMT

Edward Grove

I, _____, a registered voter residing at 29 Woodthorn Rd, Weaverville, NC 28787 _____, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

07/07/24

Date

024 15:28 EDT1

Final Audit Report

2024-07-07

Created:	2024-07-07	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAjRAXpowJ-a5Zi_dpOeMoJC4tBbX_NEBP	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-07 - 4:30:45 PM GMT- IP address: 136.57.153.155
- Document emailed to Edward Grove (edgrove50@gmail.com) for signature 2024-07-07 - 4:30:48 PM GMT
- Email viewed by Edward Grove (edgrove50@gmail.com) 2024-07-07 - 7:25:42 PM GMT- IP address: 66.249.84.65
- Document e-signed by Edward Grove (edgrove50@gmail.com) Signature Date: 2024-07-07 - 7:28:48 PM GMT - Time Source: server- IP address: 96.37.221.95
- Agreement completed. 2024-07-07 - 7:28:48 PM GMT

I, <u>Carol L. Choate</u>, a registered voter residing at 207 Nun St, Wilmington, NC 28401, hereby make this declaration regarding my signature on the petition for the We

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

07/07/24

Date

Final Audit Report

2024-07-07

Created:	2024-07-07	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAQBGqfj5wV2YagfX5lwTrHoqhP5V21gSY	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-07 - 4:44:19 PM GMT- IP address: 136.57.153.155
- Document emailed to Carol L. Choate (cchoate@acaringheartinc.com) for signature 2024-07-07 - 4:44:22 PM GMT
- Email viewed by Carol L. Choate (cchoate@acaringheartinc.com) 2024-07-07 - 6:38:03 PM GMT- IP address: 70.63.225.18
- Document e-signed by Carol L. Choate (cchoate@acaringheartinc.com) Signature Date: 2024-07-07 - 6:39:44 PM GMT - Time Source: server- IP address: 70.63.225.18
- Agreement completed. 2024-07-07 - 6:39:44 PM GMT

I, _______, a registered voter residing at 13 Bear Creek Lane in Asheville ______, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

07/07/24

Date

24 14-06 EDT

Final Audit Report

2024-07-07

Created:	2024-07-07	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAC7kRt-K0JjHYJCLj-nWu8v2Ac6V-ROv4	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-07 - 4:32:26 PM GMT- IP address: 136.57.153.155
- Document emailed to Sharen Sammons (sharensa1@gmail.com) for signature 2024-07-07 - 4:32:29 PM GMT
- Email viewed by Sharen Sammons (sharensa1@gmail.com) 2024-07-07 - 6:04:12 PM GMT- IP address: 66.249.84.64
- Document e-signed by Sharen Sammons (sharensa1@gmail.com) Signature Date: 2024-07-07 - 6:06:04 PM GMT - Time Source: server- IP address: 97.82.220.31
- Agreement completed. 2024-07-07 - 6:06:04 PM GMT



Mary Sargent

I, _____, a registered voter residing at 3712 Exbury Gardens Drive, Waxhaw, NC 28173 , hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

07/07/24

Date

Final Audit Report

2024-07-07

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA_g5C5LAbUOXSEEf4ymo2ZEDNzrFIIXCs	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:26:37 PM GMT- IP address: 136.57.153.155
- Document emailed to Mary Sargent (mxmissile@protonmail.com) for signature 2024-07-06 - 7:26:39 PM GMT
- Email viewed by Mary Sargent (mxmissile@protonmail.com) 2024-07-06 - 7:26:44 PM GMT- IP address: 185.159.157.23
- Document e-signed by Mary Sargent (mxmissile@protonmail.com) Signature Date: 2024-07-07 - 4:28:09 PM GMT - Time Source: server- IP address: 75.181.73.195
- Agreement completed. 2024-07-07 - 4:28:09 PM GMT

Judy Strickland

I, _____, a registered voter residing at 1102 Infinity Rd, Durham, NC 27712 ______, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

07/07/24

Date

Strickland

Final Audit Report

2024-07-07

Created:	2024-07-07	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAT9V6itALr34JKMTpJEtjWAZoYQkIA8Ve	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-07 - 3:41:47 PM GMT- IP address: 136.57.153.155
- Document emailed to Judy Strickland (judystrickland@frontier.com) for signature 2024-07-07 3:41:50 PM GMT
- Email viewed by Judy Strickland (judystrickland@frontier.com) 2024-07-07 - 3:49:04 PM GMT- IP address: 69.147.93.12
- Document e-signed by Judy Strickland (judystrickland@frontier.com) Signature Date: 2024-07-07 - 4:04:58 PM GMT - Time Source: server- IP address: 76.36.238.84
- Agreement completed. 2024-07-07 - 4:04:58 PM GMT

Stephanie Godbold

I, _____, a registered voter residing at 418 Shoal Creek Rd.Burnsville,NC 28714 _____, hereby make this declaration regarding my signature on the petition for the We

The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

07/07/24

Date

Saladbold (Jul 7, 2024 11:51 EDT)

Final Audit Report

2024-07-07

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAy9UNZJM68nDMXMMzahBP3ep00wWq2yXC	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:29:40 PM GMT- IP address: 136.57.153.155
- Document emailed to Stephanie Godbold (spoofdiddy@gmail.com) for signature 2024-07-06 - 7:29:42 PM GMT
- Email viewed by Stephanie Godbold (spoofdiddy@gmail.com) 2024-07-07 - 4:12:55 AM GMT- IP address: 172.225.246.11
- Document e-signed by Stephanie Godbold (spoofdiddy@gmail.com) Signature Date: 2024-07-07 - 3:51:32 PM GMT - Time Source: server- IP address: 96.36.145.121
- Agreement completed. 2024-07-07 - 3:51:32 PM GMT

I, _____, a registered voter residing at Lani Blakeslee _____, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

07/07/24

(Jul 7, 2024 08:58 EDT)

Date

Final Audit Report

2024-07-07

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAUgmaOdbyS9uhjk92l0fUqMfENjGhbyvd	

"WTPNC Signer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 6:33:08 PM GMT- IP address: 136.57.153.155
- Document emailed to LaniBlakeslee (lanibeedesign@gmail.com) for signature 2024-07-06 6:33:10 PM GMT
- Email viewed by LaniBlakeslee (lanibeedesign@gmail.com) 2024-07-07 - 12:55:07 PM GMT- IP address: 74.125.210.165
- Document e-signed by LaniBlakeslee (lanibeedesign@gmail.com) Signature Date: 2024-07-07 - 12:58:24 PM GMT - Time Source: server- IP address: 174.242.74.141
- Agreement completed. 2024-07-07 - 12:58:24 PM GMT

🚨 Adobe Acrobat Sign

LisaHawkins

I, _____, a registered voter residing at 3777 John's River Rd, Morganton, NC 28655 _____, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

07/07/24

Date

LisaHawkins (Jul 7, 2024 08:22 EDT)

Final Audit Report

2024-07-07

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA7PMjJ6hAVHIWSi1MVIYdUZVQsunsi_Vo	

"WTPNC Signer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:37:25 PM GMT- IP address: 136.57.153.155
- Document emailed to LisaHawkins (Idhjldhj@hotmail.com) for signature 2024-07-06 - 7:37:28 PM GMT
- Email viewed by LisaHawkins (IdhjIdhj@hotmail.com) 2024-07-07 - 12:19:15 PM GMT- IP address: 98.97.179.242
- Document e-signed by LisaHawkins (Idhjldhj@hotmail.com) Signature Date: 2024-07-07 - 12:22:28 PM GMT - Time Source: server- IP address: 98.97.179.242
- Agreement completed. 2024-07-07 - 12:22:28 PM GMT

🔎 Adobe Acrobat Sign

I, Linda Deming 5 B Golf Street, Asheville, NC 28801, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

07/07/24

Date

2024 00:49 EDT)

Final Audit Report

2024-07-07

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA6vBJbm60Q7ytLmAD7wD2OMQp32dhzKgl	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 8:07:05 PM GMT- IP address: 136.57.153.155
- Document emailed to Linda Deming (lindademing70@gmail.com) for signature 2024-07-06 - 8:07:08 PM GMT
- Email viewed by Linda Deming (lindademing70@gmail.com) 2024-07-06 - 8:07:10 PM GMT- IP address: 72.14.199.2
- Document e-signed by Linda Deming (lindademing70@gmail.com) Signature Date: 2024-07-07 - 4:49:56 AM GMT - Time Source: server- IP address: 35.148.196.126
- Agreement completed. 2024-07-07 - 4:49:56 AM GMT



I, ______, a registered voter residing at 2788 NC Highway 9, Black Mountain, NC, 28711 _____, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

R R (10 Figer (Jul 6, 2024 23:09 EDT)

Final Audit Report

2024-07-07

Created:	2024-07-07	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAANLrNZaDjFwFf5OA0nILdiZXybmIC7OuA	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-07 - 0:28:44 AM GMT- IP address: 136.57.153.155
- Document emailed to Richard Ferry (theferrys@yahoo.com) for signature 2024-07-07 - 0:28:46 AM GMT
- Email viewed by Richard Ferry (theferrys@yahoo.com) 2024-07-07 - 3:04:23 AM GMT- IP address: 69.147.86.248
- Signer Richard Ferry (theferrys@yahoo.com) entered name at signing as Richard Ferry 2024-07-07 - 3:09:34 AM GMT- IP address: 47.37.249.76
- Document e-signed by Richard Ferry (theferrys@yahoo.com) Signature Date: 2024-07-07 - 3:09:36 AM GMT - Time Source: server- IP address: 47.37.249.76
- Agreement completed. 2024-07-07 - 3:09:36 AM GMT

TamMunar

I, _____, a registered voter residing at 3605 Harrisburg drive , Fayetteville, NC 28306 _____, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

24 22:40 EDT)

Final Audit Report

2024-07-07

Created:	2024-07-06	
Ву:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAADPK5xhYT6MDOelR6IMa13E3WXeUMNKxm	

"WTPNC Signer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:12:36 PM GMT- IP address: 136.57.153.155
- Document emailed to TamMunar (chrisandtammunar@gmail.com) for signature 2024-07-06 7:12:38 PM GMT
- Email viewed by TamMunar (chrisandtammunar@gmail.com) 2024-07-06 - 11:02:43 PM GMT- IP address: 66.249.88.163
- Document e-signed by TamMunar (chrisandtammunar@gmail.com) Signature Date: 2024-07-07 - 2:40:34 AM GMT - Time Source: server- IP address: 107.77.232.76
- Agreement completed. 2024-07-07 - 2:40:34 AM GMT

🚴 Adobe Acrobat Sign

Anthony P Noto

I, _____, a registered voter residing at 1109 Barley Stone Way, Raleigh, NC 27603 _____, hereby make this declaration regarding my signature on the petition for the We

The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

hony P Noto

Final Audit Report

2024-07-07

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA4t4wN8-shLeO9eefQ92swCmUki7kZJKD	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:24:35 PM GMT- IP address: 136.57.153.155
- Document emailed to Anthony Noto (ap@thenotos.net) for signature 2024-07-06 - 7:24:37 PM GMT
- Email viewed by Anthony Noto (ap@thenotos.net) 2024-07-07 - 1:26:09 AM GMT- IP address: 99.164.47.161
- Signer Anthony Noto (ap@thenotos.net) entered name at signing as Anthony P Noto 2024-07-07 - 1:34:13 AM GMT- IP address: 99.164.47.161
- Document e-signed by Anthony P Noto (ap@thenotos.net)
 Signature Date: 2024-07-07 1:34:15 AM GMT Time Source: server- IP address: 99.164.47.161
- Agreement completed. 2024-07-07 - 1:34:15 AM GMT

Kellie Kliewer

I, _____, a registered voter residing at 6551 Grassy Knoll Lane, 27616 ______, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

ul 6, 2024 20:59 EDT)

Final Audit Report

2024-07-07 Created: 2024-07-06 By: Ryan Rabah (ryanrabah@gmail.com) Status: Signed Transaction ID: CBJCHBCAABAABilzFgV3yP3gupcV3kuxfYh7exdxY1Kp

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:36:11 PM GMT- IP address: 136.57.153.155
- Document emailed to Kellie Kliewer (ksweeney006@gmail.com) for signature 2024-07-06 - 7:36:14 PM GMT
- Email viewed by Kellie Kliewer (ksweeney006@gmail.com) 2024-07-07 - 0:58:51 AM GMT- IP address: 66.249.88.163
- Document e-signed by Kellie Kliewer (ksweeney006@gmail.com) Signature Date: 2024-07-07 - 0:59:59 AM GMT - Time Source: server- IP address: 136.54.162.60
- Agreement completed. 2024-07-07 - 0:59:59 AM GMT

I, ______, a registered voter residing at 207 Pungo Ln Chocowinity NC 27817 ______, hereby make this declaration regarding my signature on the petition for the We

The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

24 20:15 EDT)

Final Audit Report

2024-07-07

Created:	2024-07-06
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAwMz3nLDFq_3h8hxugp-KEnCfq2Sb80ZA

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:53:50 PM GMT- IP address: 136.57.153.155
- Document emailed to Tadd F Herron (taddherron@gmail.com) for signature 2024-07-06 - 7:53:52 PM GMT
- Email viewed by Tadd F Herron (taddherron@gmail.com) 2024-07-07 - 0:12:08 AM GMT- IP address: 66.249.88.164
- Document e-signed by Tadd F Herron (taddherron@gmail.com) Signature Date: 2024-07-07 - 0:15:20 AM GMT - Time Source: server- IP address: 98.97.178.185
- Agreement completed. 2024-07-07 - 0:15:20 AM GMT

I, <u>Patricia McCabe</u>, a registered voter residing at 309 Carpenter Town Lane, Cary, NC 27519, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

atricia McCabe

Final Audit Report

2024-07-07

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAEIiHFbZzR9MKsP7lgMt26956Dfo3iTQX	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:33:04 PM GMT- IP address: 136.57.153.155
- Document emailed to Patricia McCabe (freedompat2024@yahoo.com) for signature 2024-07-06 - 7:33:06 PM GMT
- Email viewed by Patricia McCabe (freedompat2024@yahoo.com) 2024-07-06 - 9:32:15 PM GMT- IP address: 69.147.93.12
- Document e-signed by Patricia McCabe (freedompat2024@yahoo.com) Signature Date: 2024-07-07 - 0:10:08 AM GMT - Time Source: server- IP address: 136.56.62.4
- Agreement completed. 2024-07-07 - 0:10:08 AM GMT



I, <u>Karen Tucci-Herron</u>, a registered voter residing at 207 Pungo Lane, Chocowinity, NC 27817, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Karen Tucci Herron FNP-BC

Date

Final Audit Report

2024-07-07

Created:	2024-07-06
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAb4bpaLek9WM_GnpdXce9Bo6maG1El2No

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:55:00 PM GMT- IP address: 136.57.153.155
- Document emailed to Karen Tucci-Herron (kltucci@gmail.com) for signature 2024-07-06 - 7:55:02 PM GMT
- Email viewed by Karen Tucci-Herron (kltucci@gmail.com) 2024-07-07 - 0:04:51 AM GMT- IP address: 66.249.88.162
- Document e-signed by Karen Tucci-Herron (kltucci@gmail.com) Signature Date: 2024-07-07 - 0:07:06 AM GMT - Time Source: server- IP address: 98.97.178.185
- Agreement completed. 2024-07-07 - 0:07:06 AM GMT

I, <u>Maegan Mack</u>, a registered voter residing at <u>92 Saint Mary Ave NW, Concord, NC, 28025</u>, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Maegan Mack Maegan Mack (Jul 6, 2024 19:44 EDT)

Date

Final Audit Report

2024-07-06

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA91VTbh2ow5eSWHqGPTpEktqGldrZR8Fc	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 8:28:24 PM GMT- IP address: 136.57.153.155
- Document emailed to Maegan Mack (mmack13@charlotte.edu) for signature 2024-07-06 - 8:28:27 PM GMT
- Email viewed by Maegan Mack (mmack13@charlotte.edu) 2024-07-06 - 8:28:30 PM GMT- IP address: 72.14.199.4
- Document e-signed by Maegan Mack (mmack13@charlotte.edu) Signature Date: 2024-07-06 - 11:44:48 PM GMT - Time Source: server- IP address: 76.36.37.105
- Agreement completed. 2024-07-06 - 11:44:48 PM GMT

Donna Dreyer

I, ______, a registered voter residing at 244 Great Eno Path Hillsborough NC 27278 ______, hereby make this declaration regarding my signature on the petition for the We

The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

5. 2024 19:34 FDTI

Final Audit Report

2024-07-06

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA28iA7a6cRYK_XR-PXsZkrqhKW9v8bRpi	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 8:09:30 PM GMT- IP address: 136.57.153.155
- Document emailed to Donna Dreyer (ddreyer518@gmail.com) for signature 2024-07-06 - 8:09:33 PM GMT
- Email viewed by Donna Dreyer (ddreyer518@gmail.com) 2024-07-06 - 8:09:35 PM GMT- IP address: 72.14.199.7
- Document e-signed by Donna Dreyer (ddreyer518@gmail.com) Signature Date: 2024-07-06 - 11:34:59 PM GMT - Time Source: server- IP address: 97.140.78.213
- Agreement completed. 2024-07-06 - 11:34:59 PM GMT

I, <u>Cammy Benton</u>, a registered voter residing at 828 Pinkney Place Stanley NC 28164 , hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

Jul 5, 2024 18:04 EDT)

Final Audit Report

2024-07-06

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAlxMhontb6VqB7GR7HOKtTCt8E2NI_sSK	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 8:04:38 PM GMT- IP address: 136.57.153.155
- Document emailed to Cammy Benton (cammybenton@aol.com) for signature 2024-07-06 - 8:04:41 PM GMT
- Email viewed by Cammy Benton (cammybenton@aol.com) 2024-07-06 - 10:03:14 PM GMT- IP address: 172.225.246.48
- Signer Cammy Benton (cammybenton@aol.com) entered name at signing as Cammy Benton 2024-07-06 - 10:04:02 PM GMT- IP address: 174.239.54.85
- Document e-signed by Cammy Benton (cammybenton@aol.com) Signature Date: 2024-07-06 - 10:04:04 PM GMT - Time Source: server- IP address: 174.239.54.85
- Agreement completed. 2024-07-06 - 10:04:04 PM GMT

I, _____, a registered voter residing at 2788 NC Highway 9 Black Mountain NC 28711 ____, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

1 ynn Ferry (Juli 6, 2024 16:36 EDT)

Date

Final Audit Report

2024-07-06

Created:	2024-07-06
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA9paTHKDT_aHv4f-vAwsiVtt_LBKVsc5z

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 8:05:38 PM GMT- IP address: 136.57.153.155
- Document emailed to Lynn Ferry (kowanalynn@gmail.com) for signature 2024-07-06 - 8:05:40 PM GMT
- Email viewed by Lynn Ferry (kowanalynn@gmail.com) 2024-07-06 - 8:33:22 PM GMT- IP address: 66.249.88.162
- Document e-signed by Lynn Ferry (kowanalynn@gmail.com) Signature Date: 2024-07-06 - 8:36:05 PM GMT - Time Source: server- IP address: 174.212.166.33
- Agreement completed. 2024-07-06 - 8:36:05 PM GMT

Helen Garr

I, _____, a registered voter residing at 163 Rudnick Trail, Apt. 204, Hendersonville NC 28792 ____, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

0 EDT)

Date

Final Audit Report

2024-07-06

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAuZpzxgWsOcQ2jXbtaeVYYz-IPG4yYKFA	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:40:52 PM GMT- IP address: 136.57.153.155
- Document emailed to Helen Garr (garrhm@proton.me) for signature 2024-07-06 - 7:40:55 PM GMT
- Email viewed by Helen Garr (garrhm@proton.me) 2024-07-06 - 7:41:00 PM GMT- IP address: 185.159.157.24
- Document e-signed by Helen Garr (garrhm@proton.me) Signature Date: 2024-07-06 - 8:30:06 PM GMT - Time Source: server- IP address: 89.187.178.175
- Agreement completed. 2024-07-06 - 8:30:06 PM GMT



I, ______, a registered voter residing at 382 Wimbledon Drive, Roxboro NC 27573 ______, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Cliff Hammer (Jul 6, 2024 16:27 EDT)

Date

Final Audit Report

2024-07-06

Created:	2024-07-06
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA5719dwAQ8aXc-wSLJwRK0wejaPppj1sZ

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:38:56 PM GMT- IP address: 136.57.153.155
- Document emailed to Cliff Hamner (cliff.hamner@gmail.com) for signature 2024-07-06 - 7:39:00 PM GMT
- Email viewed by Cliff Hamner (cliff.hamner@gmail.com) 2024-07-06 - 8:25:45 PM GMT- IP address: 172.225.24.34
- Document e-signed by Cliff Hamner (cliff.hamner@gmail.com) Signature Date: 2024-07-06 - 8:27:40 PM GMT - Time Source: server- IP address: 71.219.42.144
- Agreement completed. 2024-07-06 - 8:27:40 PM GMT



I, ______, a registered voter residing at Christina Charles ______, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Chat and

Date

Final Audit Report

2024-07-06

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAkc_s_NC_6RzfgwTLDjsOIMnuq48LkoBE	

"WTPNC Signer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:59:31 PM GMT- IP address: 136.57.153.155
- Document emailed to Christina Charles (christina.s.charles@gmail.com) for signature 2024-07-06 - 7:59:34 PM GMT
- Email viewed by Christina Charles (christina.s.charles@gmail.com) 2024-07-06 - 8:27:00 PM GMT- IP address: 76.210.33.161
- Document e-signed by Christina Charles (christina.s.charles@gmail.com) Signature Date: 2024-07-06 - 8:27:25 PM GMT - Time Source: server- IP address: 76.210.33.161
- Agreement completed. 2024-07-06 - 8:27:25 PM GMT

🙏 Adobe Acrobat Sign

I, <u>Jason Zeis</u>, a registered voter residing at 8523 Foxbridge Dr, Matthews,NC 28104, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Jason Zeis (Jul 6, 2024 J6:23 EDT)

Date

Final Audit Report

2024-07-06

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAmUGYu8IB4AkxwdAbkMyrWQZ8OkDSNC_m	

"WTPNC Signer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 8:16:08 PM GMT- IP address: 136.57.153.155
- Document emailed to Jason Zeis (granylow@gmail.com) for signature 2024-07-06 - 8:16:11 PM GMT
- Email viewed by Jason Zeis (granylow@gmail.com) 2024-07-06 - 8:19:26 PM GMT- IP address: 172.225.248.169
- Document e-signed by Jason Zeis (granylow@gmail.com) Signature Date: 2024-07-06 - 8:23:35 PM GMT - Time Source: server- IP address: 71.75.200.68
- Agreement completed. 2024-07-06 - 8:23:35 PM GMT

Adobe Acrobat Sign

Jody Zeis

I, _____, a registered voter residing at 8523 Foxbridge Dr, Matthews, NC 28104 _____, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

Final Audit Report

2024-07-06

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA6nKKGbVZ2QHcG-TfA6r4Bq0JlcL5IWi9	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 8:14:54 PM GMT- IP address: 136.57.153.155
- Document emailed to Jody Zeis (jodyzeis@gmail.com) for signature 2024-07-06 - 8:14:56 PM GMT
- Email viewed by Jody Zeis (jodyzeis@gmail.com) 2024-07-06 - 8:15:18 PM GMT- IP address: 146.75.222.0
- Document e-signed by Jody Zeis (jodyzeis@gmail.com) Signature Date: 2024-07-06 - 8:18:47 PM GMT - Time Source: server- IP address: 174.247.2.63
- Agreement completed. 2024-07-06 - 8:18:47 PM GMT

Pascale Birien

I, _____, a registered voter residing at 412 Newburgh Dr, Fayetteville, NC 28311 _____, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

Pascale Birien (Jul 6, 2024 22:15 GMT+2)

Final Audit Report

2024-07-06

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAUsaaVKf6VNPWDAw59PkkVDVzcm_4GAco	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 6:32:05 PM GMT- IP address: 136.57.153.155
- Document emailed to Pascale Birien (pascalebirien@yahoo.fr) for signature 2024-07-06 6:32:08 PM GMT
- Email viewed by Pascale Birien (pascalebirien@yahoo.fr) 2024-07-06 - 8:06:27 PM GMT- IP address: 87.248.114.143
- Document e-signed by Pascale Birien (pascalebirien@yahoo.fr) Signature Date: 2024-07-06 - 8:15:54 PM GMT - Time Source: server- IP address: 90.93.99.129
- Agreement completed. 2024-07-06 - 8:15:54 PM GMT

John Regan

I, _____, a registered voter residing at 338 Lindale Rd., CarthageNC 28327 ______, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

024 16:14 EDT)

Final Audit Report

2024-07-06

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAkpR_SDgKr3BBF25qJooZe4AdUTES4L0T	

"WTPNC Signer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:19:34 PM GMT- IP address: 136.57.153.155
- Document emailed to John Regan (johnantregan@gmail.com) for signature 2024-07-06 7:19:36 PM GMT
- Email viewed by John Regan (johnantregan@gmail.com) 2024-07-06 - 7:52:53 PM GMT- IP address: 172.225.246.49
- Document e-signed by John Regan (johnantregan@gmail.com) Signature Date: 2024-07-06 - 8:14:46 PM GMT - Time Source: server- IP address: 98.97.179.101
- Agreement completed. 2024-07-06 - 8:14:46 PM GMT

🚨 Adobe Acrobat Sign

ShannonCarbone

I, _____, a registered voter residing at 17337 Wavecrest Court Cornelius, NC 28031 _____, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

onie (Jul 6, 2024 16:05 EDT)

Final Audit Report

2024-07-06

Created:	2024-07-06
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAfiK_oG7pii8IBNrelj8Fprjc6tcCEBx5

"WTPNC Signer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 6:38:41 PM GMT- IP address: 136.57.153.155
- Document emailed to ShannonCarbone (scarbone9398@gmail.com) for signature 2024-07-06 - 6:38:44 PM GMT
- Email viewed by ShannonCarbone (scarbone9398@gmail.com) 2024-07-06 - 8:04:34 PM GMT- IP address: 104.28.57.246
- Document e-signed by ShannonCarbone (scarbone9398@gmail.com) Signature Date: 2024-07-06 - 8:05:58 PM GMT - Time Source: server- IP address: 174.209.96.59
- Agreement completed. 2024-07-06 - 8:05:58 PM GMT

🚴 Adobe Acrobat Sign

Kevin Sleem

I, _____, a registered voter residing at 707 Greenland Drive, Fayetteville, NC 28305 _____, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Kevin Sleem (Jul 6, 2024 16:01 EDT)

Date

Final Audit Report

2024-07-06

Created:	2024-07-06
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAHPy8373jD5v1TZRPDDDOMBxw-gbbbdxZ

"WTPNC Signer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:17:16 PM GMT- IP address: 136.57.153.155
- C Document emailed to Kevin Sleem (sleemkevin@gmail.com) for signature 2024-07-06 - 7:17:18 PM GMT
- Email viewed by Kevin Sleem (sleemkevin@gmail.com) 2024-07-06 - 8:00:43 PM GMT- IP address: 66.249.88.161
- Document e-signed by Kevin Sleem (sleemkevin@gmail.com) Signature Date: 2024-07-06 - 8:01:24 PM GMT - Time Source: server- IP address: 172.74.185.68
- Agreement completed. 2024-07-06 - 8:01:24 PM GMT

👃 Adobe Acrobat Sign

I, ______, a registered voter residing at Scott Chamberlin _____, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

SAI cott Chamberlin (Jul 6, 2024 15:59 EDT)

Final Audit Report

2024-07-06

Created:	2024-07-06
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAGDNm4q7bH3ck73Ych8Jo1JqrOsWYH-a_

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 6:39:42 PM GMT- IP address: 136.57.153.155
- Document emailed to Scott Chamberlin (scott@scottchamberlin.com) for signature 2024-07-06 - 6:39:44 PM GMT
- Email viewed by Scott Chamberlin (scott@scottchamberlin.com) 2024-07-06 - 7:57:26 PM GMT- IP address: 65.191.192.86
- Document e-signed by Scott Chamberlin (scott@scottchamberlin.com) Signature Date: 2024-07-06 - 7:59:57 PM GMT - Time Source: server- IP address: 65.191.192.86
- Agreement completed. 2024-07-06 - 7:59:57 PM GMT

I, <u>Mariana Watson</u>, a registered voter residing at <u>124 Nob Hill Rd., Hendersonville, NC</u>, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Mariana Watson Mariana Watson (Jul 6, 2024 15:56 EDT)

Date

Final Audit Report

2024-07-06

Created:	2024-07-06	
Ву:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA4IEI1bfpRYulkh0fzA6GxbC4H9nLXSH9	

"WTPNC Signer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:52:28 PM GMT- IP address: 136.57.153.155
- Document emailed to Mariana Watson (danandmariana1@gmail.com) for signature 2024-07-06 - 7:52:31 PM GMT
- Email viewed by Mariana Watson (danandmariana1@gmail.com) 2024-07-06 - 7:54:33 PM GMT- IP address: 66.249.80.38
- Signer Mariana Watson (danandmariana1@gmail.com) entered name at signing as Mariana Watson 2024-07-06 - 7:56:41 PM GMT- IP address: 23.127.178.91
- Document e-signed by Mariana Watson (danandmariana1@gmail.com) Signature Date: 2024-07-06 - 7:56:43 PM GMT - Time Source: server- IP address: 23.127.178.91

Agreement completed. 2024-07-06 - 7:56:43 PM GMT

Mark Ortiz

I, _____, a registered voter residing at 155 Wankel Dr., Kannapolis NC 28083 _____, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

Final Audit Report

2024-07-06

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAIITLXcQ46BXplhc6xWW5iw7MfcdKrlhh	

"WTPNC Signer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:16:26 PM GMT- IP address: 136.57.153.155
- Document emailed to Mark Ortiz (markortizauto@windstream.net) for signature 2024-07-06 7:16:29 PM GMT
- Email viewed by Mark Ortiz (markortizauto@windstream.net) 2024-07-06 - 7:47:02 PM GMT- IP address: 40.142.139.11
- Document e-signed by Mark Ortiz (markortizauto@windstream.net) Signature Date: 2024-07-06 - 7:48:28 PM GMT - Time Source: server- IP address: 40.142.139.11
- Agreement completed. 2024-07-06 - 7:48:28 PM GMT

🚴 Adobe Acrobat Sign

I, ______, a registered voter residing at Chatham County _____, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

146
(homas Enright (Jul 6, 2024 15:47 EDT)

Final Audit Report

2024-07-06

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAiCo0gi7eDhjMzCG0RP-OpvM9ED_7tq5z	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:34:40 PM GMT- IP address: 136.57.153.155
- Document emailed to Thomas Enright (jimenright7@gmail.com) for signature 2024-07-06 7:34:43 PM GMT
- Email viewed by Thomas Enright (jimenright7@gmail.com) 2024-07-06 - 7:46:03 PM GMT- IP address: 66.249.88.161
- Document e-signed by Thomas Enright (jimenright7@gmail.com)
 Signature Date: 2024-07-06 7:47:05 PM GMT Time Source: server- IP address: 108.77.86.189
- Agreement completed. 2024-07-06 - 7:47:05 PM GMT

Conor Sargent

I, _____, a registered voter residing at 3712 Exbury Gardens Drive, Waxhaw, NC 28173 , hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

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Final Audit Report

2024-07-06

Created:	2024-07-06
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAEc8cSLic04HaQ9HsH8ROm03_uUvQHDSW

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:27:53 PM GMT- IP address: 136.57.153.155
- Document emailed to Conor Sargent (csnc2023@proton.me) for signature 2024-07-06 7:27:56 PM GMT
- Email viewed by Conor Sargent (csnc2023@proton.me) 2024-07-06 - 7:28:00 PM GMT- IP address: 194.126.177.7
- Document e-signed by Conor Sargent (csnc2023@proton.me) Signature Date: 2024-07-06 - 7:41:53 PM GMT - Time Source: server- IP address: 75.181.73.195
- Agreement completed. 2024-07-06 - 7:41:53 PM GMT



Vicki Haislip

I, _____, a registered voter residing at 2307 Rockwood Drive, Sanford, NC _____, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Ucci Haisilp (Jul 6, 2024 15:41 EDT)

Date

Final Audit Report

2024-07-06

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA9E24UdFDQgQxlGKtDDc2MwU1u9Q0CuWq	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 6:50:16 PM GMT- IP address: 136.57.153.155
- C Document emailed to Vicki Haislip (vohaislip@gmail.com) for signature 2024-07-06 - 6:50:19 PM GMT
- Email viewed by Vicki Haislip (vohaislip@gmail.com) 2024-07-06 - 7:39:13 PM GMT- IP address: 146.75.222.0
- Document e-signed by Vicki Haislip (vohaislip@gmail.com) Signature Date: 2024-07-06 - 7:41:39 PM GMT - Time Source: server- IP address: 75.191.212.126
- Agreement completed. 2024-07-06 - 7:41:39 PM GMT

Jeff Scott

I, _____, a registered voter residing at 1300 Blueberry Lane, Charlotte, NC 28226 _____, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Jeff Scott Jeff Scott (Jul 6, 2024 15:41 EDT)

Date

Final Audit Report

2024-07-06

Created:	2024-07-06	
By;	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAsCdY5hb6V7cuzzwyWpqMESqbxWoDWrYQ	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:20:11 PM GMT- IP address: 136.57.153.155
- Document emailed to Jeff Scott (jscott.ofsf@gmail.com) for signature 2024-07-06 7:20:14 PM GMT
- Email viewed by Jeff Scott (jscott.ofsf@gmail.com) 2024-07-06 - 7:39:55 PM GMT- IP address: 66.249.88.163
- Document e-signed by Jeff Scott (jscott.ofsf@gmail.com) Signature Date: 2024-07-06 - 7:41:32 PM GMT - Time Source: server- IP address: 71.68.84.24
- Agreement completed. 2024-07-06 - 7:41:32 PM GMT

Jennifer Lunz

I, ______, a registered voter residing at 1406 Tunnel Mtn Rd, Sylva, NC 28779 ______, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

ul 6, 2024 15:36 EDT)

Final Audit Report

2024-07-06

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA0VZ5WRUytNBBVyC2W7P8fS8_TmCfF6Q9	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 6:58:51 PM GMT- IP address: 136.57.153.155
- Document emailed to Jennifer Lunz (oneuniqueflower@gmail.com) for signature 2024-07-06 6:58:54 PM GMT
- Email viewed by Jennifer Lunz (oneuniqueflower@gmail.com) 2024-07-06 - 7:32:09 PM GMT- IP address: 66.249.88.164
- Document e-signed by Jennifer Lunz (oneuniqueflower@gmail.com) Signature Date: 2024-07-06 - 7:36:13 PM GMT - Time Source: server- IP address: 174.212.100.244
- Agreement completed. 2024-07-06 - 7:36:13 PM GMT

I, ______, a registered voter residing at 6220 Bells Mill Dr, Charlotte NC 28269 ______, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

ussen (Jul 6, 2024 15:29 EDT)

Final Audit Report

2024-07-06

Created:	2024-07-06
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAzOzTTb668gKS-r5KnS9XeE8nIP-v15FF

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:18:32 PM GMT- IP address: 136.57.153.155
- Document emailed to Jennifer Rasmussen (jras1231@gmail.com) for signature 2024-07-06 7:18:34 PM GMT
- Email viewed by Jennifer Rasmussen (jras1231@gmail.com) 2024-07-06 - 7:19:14 PM GMT- IP address: 66.249.88.164
- Document e-signed by Jennifer Rasmussen (jras1231@gmail.com) Signature Date: 2024-07-06 - 7:29:58 PM GMT - Time Source: server- IP address: 136.57.153.155
- Agreement completed. 2024-07-06 - 7:29:58 PM GMT

I, _____, a registered voter residing at 141 School Rd, Asheville,NC. 28806 _____, hereby

make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

024 15:28 EDT)

Final Audit Report

2024-07-06

Created:	2024-07-06	
Ву:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAbQJ2oG_iBY-Dv9Mr43bqQisG9gmVjQ_m	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:18:01 PM GMT- IP address: 136.57.153.155
- Document emailed to Megan Paden (mhearne414@gmail.com) for signature 2024-07-06 7:18:03 PM GMT
- Email viewed by Megan Paden (mhearne414@gmail.com) 2024-07-06 - 7:24:33 PM GMT- IP address: 66.249.88.163
- Document e-signed by Megan Paden (mhearne414@gmail.com) Signature Date: 2024-07-06 - 7:28:40 PM GMT - Time Source: server- IP address: 107.77.236.33
- Agreement completed. 2024-07-06 - 7:28:40 PM GMT

Sarah Fields

I, _____, a registered voter residing at 5 Green Oak Rd AVL NC 28804 _____, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

06/07/24

Date

6, 2024 14:22 CDT)

Final Audit Report

2024-07-06

Created:	2024-07-06	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAexIqbDrlwqfXcNsMd8WteFdidCjwkvXi	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-06 - 7:11:14 PM GMT- IP address: 136.57.153.155
- Document emailed to Sarah Fields (mzfields801@gmail.com) for signature 2024-07-06 - 7:11:17 PM GMT
- Email viewed by Sarah Fields (mzfields801@gmail.com) 2024-07-06 - 7:21:43 PM GMT- IP address: 172.225.20.58
- Document e-signed by Sarah Fields (mzfields801@gmail.com) Signature Date: 2024-07-06 - 7:22:50 PM GMT - Time Source: server- IP address: 174.239.60.246
- Agreement completed. 2024-07-06 - 7:22:50 PM GMT

I, <u>Heidi Aldinger</u>, a registered voter residing at <u>3024 Archdale Dr Charlotte, NC 28210</u>, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

05/07/24

Heidi Aldinger Heidi Aldinger (Jul 5, 2024 13:47 EDT)

Date

Final Audit Report

2024-07-05

Created:	2024-07-05	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAa5q83u3zo_AQ-8UQvfl19i-AZicJlcBC	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-05 - 4:43:16 PM GMT- IP address: 136.57.153.155
- Document emailed to Heidi Aldinger (heidi.aldinger@gmail.com) for signature 2024-07-05 4:44:25 PM GMT
- Email viewed by Heidi Aldinger (heidi.aldinger@gmail.com) 2024-07-05 - 5:46:20 PM GMT- IP address: 66.249.88.164
- Document e-signed by Heidi Aldinger (heidi.aldinger@gmail.com) Signature Date: 2024-07-05 - 5:47:26 PM GMT - Time Source: server- IP address: 24.74.40.59
- Agreement completed. 2024-07-05 - 5:47:26 PM GMT

I, <u>Katherine E Allender</u>, a registered voter residing at 9182 Bonnie Briar Cir, Charlotte, NC 28277, hereby make this declaration regarding my signature on the petition for the We The People party in North Carolina.

I state the following:

- I was a signer of the petition to create a new political party in North Carolina called We The People.
- I understood the objective of the petition was to establish a new political party called We The People. It was communicated to me that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to the party's core values.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

05/07/24

Date

E Allender (Jul 5, 2024 13:45 EDT)

Final Audit Report

2024-07-05

Created:	2024-07-05	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAS3Aj7SV_gEyW5kUv5E2YNDKpNTkCeXRL	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-07-05 - 4:47:26 PM GMT- IP address: 136.57.153.155
- Document emailed to Katherine Allender (katboxing@gmail.com) for signature 2024-07-05 4:47:29 PM GMT
- Email viewed by Katherine Allender (katboxing@gmail.com) 2024-07-05 - 5:42:18 PM GMT- IP address: 172.225.202.26
- Signer Katherine Allender (katboxing@gmail.com) entered name at signing as Katherine E Allender 2024-07-05 - 5:45:02 PM GMT- IP address: 71.71.133.98
- Document e-signed by Katherine E Allender (katboxing@gmail.com) Signature Date: 2024-07-05 - 5:45:04 PM GMT - Time Source: server- IP address: 71.71.133.98
- Agreement completed. 2024-07-05 - 5:45:04 PM GMT

EXHIBIT E.2 – Petition Circulators Declarations

VOLUNTEER DECLARATION FOR WE THE PEOPLE PARTY

I, _____, a registered voter residing at 707 Tidewater Drive, Ssnford,NC 27330

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

Anne Knuth 16:24 EDT)

24/06/24

Signature

Date

WTPNC Volunteer Declaration

Final Audit Report

2024-06-24

Created:	2024-06-24	
Ву:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAWquIYT39EcR4kQS5e0xdbPrczUgXk575	

"WTPNC Volunteer Declaration" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 7:53:37 PM GMT- IP address: 64.158.217.230
- Document emailed to Anne Knuth (aknuth20@hotmail.com) for signature 2024-06-24 - 7:53:39 PM GMT
- Email viewed by Anne Knuth (aknuth20@hotmail.com) 2024-06-24 - 8:13:42 PM GMT- IP address: 104.28.39.138
- Document e-signed by Anne Knuth (aknuth20@hotmail.com) Signature Date: 2024-06-24 - 8:24:16 PM GMT - Time Source: server- IP address: 47.134.8.131
- Agreement completed. 2024-06-24 - 8:24:16 PM GMT



VOLUNTEER DECLARATION FOR WE THE PEOPLE PARTY

I, _____, a registered voter residing at 9 Park Drive, Weaverville, NC 28787

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

th Baldino 4:57 EDT)

Date

24/06/24

WTPNC Volunteer Declaration

Final Audit Report

2024-06-24

By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAbQuPpilrmcVISD9oqEjTpdYzAjXSClz_	

"WTPNC Volunteer Declaration" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 6:47:20 PM GMT- IP address: 64.158.217.230
- Document emailed to Beth Baldino (bethbaldino@gmail.com) for signature 2024-06-24 - 6:47:23 PM GMT
- Email viewed by Beth Baldino (bethbaldino@gmail.com) 2024-06-24 - 6:47:26 PM GMT- IP address: 72.14.199.2
- Document e-signed by Beth Baldino (bethbaldino@gmail.com) Signature Date: 2024-06-24 - 6:57:31 PM GMT - Time Source: server- IP address: 96.37.216.68
- Agreement completed. 2024-06-24 - 6:57:31 PM GMT

VOLUNTEER DECLARATION FOR WE THE PEOPLE PARTY

Brett Applebaum	, a registered voter residing at
21 Majestic oak circle	

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

Brett Applebaum

24/06/24

Date

WTPNC Volunteer Declaration

Final Audit Report

2024-06-24

D	Dura Dahah (aparahah @amail.com)	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAY4ER9sLgujCLfQ0LyMPque-mQ8F2RHIO	

"WTPNC Volunteer Declaration" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 8:46:24 PM GMT- IP address: 64.158.217.230
- Document emailed to Brett Applebaum (brett.applebaum1@gmail.com) for signature 2024-06-24 8:46:27 PM GMT
- Email viewed by Brett Applebaum (brett.applebaum1@gmail.com) 2024-06-24 - 8:51:17 PM GMT- IP address: 66.249.88.3
- Document e-signed by Brett Applebaum (brett.applebaum1@gmail.com) Signature Date: 2024-06-24 - 9:49:09 PM GMT - Time Source: server- IP address: 199.168.201.103
- Agreement completed. 2024-06-24 - 9:49:09 PM GMT

VOLUNTEER DECLARATION FOR WE THE PEOPLE PARTY

I, <u>Christopher Munar</u>, a registered voter residing at 3605 HARRISBURG DRIVE, FAYETTEVILLE, NC 28306

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

2024 17:28 EDT)

24/06/24

Signature

Date

WTPNC Volunteer Declaration

Final Audit Report

2024-06-24

Created:	2024-06-24
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA108iE0hsrQiPNLqN5i4qOaPIQco0RMy7

"WTPNC Volunteer Declaration" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 7:54:48 PM GMT- IP address: 64.158.217.230
- Document emailed to Christopher Munar (christopher.munar@outlook.com) for signature 2024-06-24 7:54:51 PM GMT
- Email viewed by Christopher Munar (christopher.munar@outlook.com) 2024-06-24 - 9:25:28 PM GMT- IP address: 12.74.212.95
- Document e-signed by Christopher Munar (christopher.munar@outlook.com) Signature Date: 2024-06-24 - 9:28:21 PM GMT - Time Source: server- IP address: 12.74.212.95
- Agreement completed. 2024-06-24 - 9:28:21 PM GMT

VOLUNTEER DECLARATION FOR WE THE PEOPLE PARTY

I, ______, a registered voter residing at 73 Night Heron Ct, Sanford NC 27332

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

Connie Asero Counte Asero (Jun 24, 2024 15:55 EDT)

24/06/24

Date

WTPNC Volunteer Declaration

Final Audit Report

2024-06-24

Created:	2024-06-24	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAALTImQLM_mOamly7e-CPyXxFntWecu55U	

"WTPNC Volunteer Declaration" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 7:51:25 PM GMT- IP address: 64.158.217.230
- Document emailed to Connie Asero (connieasero@gmail.com) for signature 2024-06-24 - 7:51:28 PM GMT
- Email viewed by Connie Asero (connieasero@gmail.com) 2024-06-24 - 7:53:35 PM GMT- IP address: 66.249.88.2
- Document e-signed by Connie Asero (connieasero@gmail.com) Signature Date: 2024-06-24 - 7:55:32 PM GMT - Time Source: server- IP address: 75.140.204.38
- Agreement completed. 2024-06-24 - 7:55:32 PM GMT

Garry Wallace

I, _

, a registered voter residing at 8 Ravenna Street, Asheville, North Carolina, 28803

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

Garry Wallace

24/06/24

Signature

Date

Final Audit Report

2024-06-24

Status:	Signed	
ransaction ID:	CBJCHBCAABAAR-PzfLfnxla4nwsMvWoJT8huMulvSF4J	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 8:48:03 PM GMT- IP address: 64.158.217.230
- Document emailed to Garry Wallace (organicfarm2009@yahoo.com) for signature 2024-06-24 - 8:48:07 PM GMT
- Email viewed by Garry Wallace (organicfarm2009@yahoo.com) 2024-06-24 - 10:51:36 PM GMT- IP address: 209.73.183.60
- Document e-signed by Garry Wallace (organicfarm2009@yahoo.com) Signature Date: 2024-06-24 - 10:59:19 PM GMT - Time Source: server- IP address: 71.219.40.218
- Agreement completed. 2024-06-24 - 10:59:19 PM GMT

Heidi Aldinger

I, _____, a registered voter residing at 3024 Archdale Dr. Charlotte, NC 28210

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

Jun 24, 2024 22:22 EDT)

24/06/24

Date

Final Audit Report

2024-06-25

Created:	2024-06-25
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA1wEdcLIYCZi66heeNH3bNB4FZR510Hdo

"WTPNC Volunteer Declaration" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 1:48:16 AM GMT- IP address: 64.158.217.230
- Document emailed to Heidi Aldinger (heidi.aldinger@gmail.com) for signature 2024-06-25 1:48:19 AM GMT
- Email viewed by Heidi Aldinger (heidi.aldinger@gmail.com) 2024-06-25 - 2:19:04 AM GMT- IP address: 172.224.237.10
- Document e-signed by Heidi Aldinger (heidi.aldinger@gmail.com) Signature Date: 2024-06-25 - 2:22:34 AM GMT - Time Source: server- IP address: 24.74.40.59
- Agreement completed. 2024-06-25 - 2:22:34 AM GMT

🚴 Adobe Acrobat Sign

Jeff Scott

I, _____, a registered voter residing at 1300 Blueberry Lane, Charlotte, NC 28226

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

:49 EOT)

24/06/24

Date

Final Audit Report

2024-06-25

Created:	2024-06-25
Ву:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAACD8pwmBDV-IIgDpix7j32A6PwTBRqhZ4

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 1:47:31 AM GMT- IP address: 64.158.217.230
- Document emailed to Jeff Scott (jscott.ofsf@gmail.com) for signature 2024-06-25 - 1:47:34 AM GMT
- Email viewed by Jeff Scott (jscott.ofsf@gmail.com) 2024-06-25 - 1:49:08 AM GMT- IP address: 66.249.88.1
- Document e-signed by Jeff Scott (jscott.ofsf@gmail.com) Signature Date: 2024-06-25 - 1:49:35 AM GMT - Time Source: server- IP address: 71.68.84.24
- Agreement completed. 2024-06-25 - 1:49:35 AM GMT

I, _____, a registered voter residing at 1406 Tunnel Mtn Rd. Sylva, NC. 28779

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

24/06/24

Signature

Date

Final Audit Report

2024-06-24

Created:	2024-06-24	
Ву:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAA4qCjgs2CT3NnDGykQtuECmurY1gy2Py1	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 8:53:21 PM GMT- IP address: 64.158.217.230
- Document emailed to Jennifer Lunz (oneuniqueflower@gmail.com) for signature 2024-06-24 - 8:53:24 PM GMT
- Email viewed by Jennifer Lunz (oneuniqueflower@gmail.com) 2024-06-24 - 9:50:32 PM GMT- IP address: 66.249.84.75
- Document e-signed by Jennifer Lunz (oneuniqueflower@gmail.com) Signature Date: 2024-06-24 - 9:55:17 PM GMT - Time Source: server- IP address: 159.235.41.70
- Agreement completed. 2024-06-24 - 9:55:17 PM GMT

I, ______, a registered voter residing at 6220 Bells Mills Drive, Charlotte NC 28269

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

n Hon 75, 2024 11:44 EDT)

25/06/24

Signature

Date

WTPNC Volunteer Declaration Adobe

Final Audit Report

2024-06-25

	2024-06-25	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAsN7gV62SCN68TwsNQIIJMHsfW_BclfBn	

"WTPNC Volunteer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 3:40:34 PM GMT- IP address: 136.57.153.155
- Document emailed to Jennifer Rasmussen (jras1231@gmail.com) for signature 2024-06-25 - 3:40:38 PM GMT
- Email viewed by Jennifer Rasmussen (jras1231@gmail.com) 2024-06-25 - 3:43:36 PM GMT- IP address: 66.249.88.5
- Document e-signed by Jennifer Rasmussen (jras1231@gmail.com) Signature Date: 2024-06-25 - 3:44:55 PM GMT - Time Source: server- IP address: 136.57.153.155
- Agreement completed. 2024-06-25 - 3:44:55 PM GMT

📜 Adobe Acrobat Sign

I, Jody Spees _____, a registered voter residing at 506 dodge st. Kannapolis NC. 28083

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

4, 2028 17:47 EDT)

24/06/24

Signature

Date

Final Audit Report

2024-06-24

Created:	2024-06-24
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAABb6f6Ni2W09yBLhncV7tjbiRFJKrVriE

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 9:21:31 PM GMT- IP address: 64.158.217.230
- Document emailed to Jody Spees (jodyspees5@hotmail.com) for signature 2024-06-24 - 9:21:34 PM GMT
- Email viewed by Jody Spees (jodyspees5@hotmail.com) 2024-06-24 - 9:45:38 PM GMT- IP address: 146.75.222.1
- Document e-signed by Jody Spees (jodyspees5@hotmail.com) Signature Date: 2024-06-24 - 9:47:10 PM GMT - Time Source: server- IP address: 174.203.244.165
- Agreement completed. 2024-06-24 - 9:47:10 PM GMT

Joel Clark

, a registered voter residing at I. 324 Beaucatcher Rd, Asheville, NC 28805

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

Joel Clark Signature

24/06/24

Date

Final Audit Report

2024-06-24

Created:	2024-06-24	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAuVeBlwom79DsNRci9dGqvLmBYSR0Lt3K	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 8:47:33 PM GMT- IP address: 64.158.217.230
- Document emailed to Joel Clark (joelstevenclark@gmail.com) for signature 2024-06-24 - 8:47:35 PM GMT
- Email viewed by Joel Clark (joelstevenclark@gmail.com) 2024-06-24 - 8:48:15 PM GMT- IP address: 66.249.88.3
- Document e-signed by Joel Clark (joelstevenclark@gmail.com) Signature Date: 2024-06-24 - 8:49:33 PM GMT - Time Source: server- IP address: 154.47.28.93
- Agreement completed. 2024-06-24 - 8:49:33 PM GMT

John Regan

, a registered voter residing at 338 Lindale Rd., Carthage, NC 28327 Ι, .

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

John Regan 24 18:44 EDT)

24/06/24

Signature

Date

Final Audit Report

2024-06-24

Created:	2024-06-24
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAjh1VvwaDormM7MbHbciWDxnDoN4BEpbW

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 7:52:16 PM GMT- IP address: 64.158.217.230
- Document emailed to John Regan (johnantregan@gmail.com) for signature 2024-06-24 - 7:52:19 PM GMT
- Email viewed by John Regan (johnantregan@gmail.com) 2024-06-24 - 9:08:21 PM GMT- IP address: 104.28.39.141
- Document e-signed by John Regan (johnantregan@gmail.com) Signature Date: 2024-06-24 - 10:44:06 PM GMT - Time Source: server- IP address: 129.222.252.14
- Agreement completed. 2024-06-24 - 10:44:06 PM GMT

Katherine Allender

I, _____, a registered voter residing at 9182 Bonnie Briar Cir, Charlotte, NC 28277

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

024 18:38 EDT)

24/06/24

Signature

Date

Final Audit Report

2024-06-24

Created:	2024-06-24	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAIfBSc7yxEamFWHT-vOL38BUbN-NpvQVf	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 8:42:36 PM GMT- IP address: 64.158.217.230
- Document emailed to Katherine Allender (katboxing@gmail.com) for signature 2024-06-24 8:42:39 PM GMT
- Email viewed by Katherine Allender (katboxing@gmail.com) 2024-06-24 - 9:51:35 PM GMT- IP address: 140.248.0.0
- Document e-signed by Katherine Allender (katboxing@gmail.com) Signature Date: 2024-06-24 - 10:38:21 PM GMT - Time Source: server- IP address: 71.71.133.98
- Agreement completed. 2024-06-24 - 10:38:21 PM GMT



Kathy Calabrese

I, _____, a registered voter residing at ______, 314 Heartwood Way, Whittier NC

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

athy Calabrese

24/06/24

Date

Final Audit Report

2024-06-25

Created:	2024-06-24	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAACRmdCmgcOoEtg5OnzzDe0Or1VxsXGOZs	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 8:45:13 PM GMT- IP address: 64.158.217.230
- Document emailed to Kathy Calabrese (kathysgardenherbals@yahoo.com) for signature 2024-06-24 - 8:45:16 PM GMT
- Email viewed by Kathy Calabrese (kathysgardenherbals@yahoo.com) 2024-06-25 - 0:37:46 AM GMT- IP address: 69.147.93.139
- Document e-signed by Kathy Calabrese (kathysgardenherbals@yahoo.com) Signature Date: 2024-06-25 - 0:39:14 AM GMT - Time Source: server- IP address: 104.169.189.208
- Agreement completed. 2024-06-25 - 0:39:14 AM GMT

Kevin Sleem

I, _____, a registered voter residing at 707 Greenland Drive, Fayetteville, NC 28305

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

Kevin Sleem Sleem (Jun 24, 2024 15:59 EDT)

24/06/24

Date

Final Audit Report

2024-06-24

Created:	2024-06-24	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAhi4ZwFpObescWRwl92z6LxnpA3fEzkF0	

"WTPNC Volunteer Declaration" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 7:52:55 PM GMT- IP address: 64.158.217.230
- Document emailed to Kevin Sleem (sleemkevin@gmail.com) for signature 2024-06-24 - 7:52:59 PM GMT
- Email viewed by Kevin Sleem (sleemkevin@gmail.com) 2024-06-24 - 7:58:03 PM GMT- IP address: 66.249.88.2
- Document e-signed by Kevin Sleem (sleemkevin@gmail.com) Signature Date: 2024-06-24 - 7:59:18 PM GMT - Time Source: server- IP address: 172.74.185.68
- Agreement completed. 2024-06-24 - 7:59:18 PM GMT

🔎 Adobe Acrobat Sign

I, Lani Blakeslee

, a registered voter residing at 103 Cumberland Circle Asheville NC 28801

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

R. Blekert lun 24, 2024 22:53 EDT)

24/06/24

Date

Final Audit Report

2024-06-25

Created:	2024-06-24	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAD2thIS9h_UNEZqbcTKv-khuMLfxbpQC8	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 8:51:46 PM GMT- IP address: 64.158.217.230
- Document emailed to Lani Blakeslee (lanibeedesign@gmail.com) for signature 2024-06-24 8:52:02 PM GMT
- Email viewed by Lani Blakeslee (lanibeedesign@gmail.com) 2024-06-25 - 2:49:30 AM GMT- IP address: 66.249.84.64
- Document e-signed by Lani Blakeslee (lanibeedesign@gmail.com) Signature Date: 2024-06-25 - 2:53:06 AM GMT - Time Source: server- IP address: 66.169.95.201
- Agreement completed. 2024-06-25 - 2:53:06 AM GMT

Liz Chamberlin

I, _____, a registered voter residing at 75 Towhee Run, Pinehurst, NC 28374

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

iz Chamberlin

24/06/24

Date

Final Audit Report

2024-06-24

Created:	2024-06-24	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAirmpTc4JNKvzkKvDyw11_cagRTd3zDAO	

"WTPNC Volunteer Declaration" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 7:49:10 PM GMT- IP address: 64.158.217.230
- Document emailed to Liz Chamberlin (Imyerschamberlin@gmail.com) for signature 2024-06-24 - 7:49:14 PM GMT
- Email viewed by Liz Chamberlin (Imyerschamberlin@gmail.com) 2024-06-24 - 8:16:21 PM GMT- IP address: 66.249.88.3
- Signer Liz Chamberlin (Imyerschamberlin@gmail.com) entered name at signing as Liz Chamberlin 2024-06-24 - 8:19:29 PM GMT- IP address: 65.191.192.86
- Document e-signed by Liz Chamberlin (Imyerschamberlin@gmail.com) Signature Date: 2024-06-24 - 8:19:31 PM GMT - Time Source: server- IP address: 65.191.192.86

Agreement completed. 2024-06-24 - 8:19:31 PM GMT

Maureen McDonnell

I, _____, a registered voter residing at Maureen McDonnell

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

dellar				
(MAD)	a			
SM reenuel	Donnell (Jun	24, 2024 1	7:54 EDT)	-

Date

24/06/24

Final Audit Report

2024-06-24

Created:	2024-06-24
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAdQFYaP-0Vj1JuZHwQKLtr-z_7trYO5RG

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 8:49:13 PM GMT- IP address: 64.158.217.230
- Document emailed to Maureen McDonnell (maurahealth55@gmail.com) for signature 2024-06-24 8:49:16 PM GMT
- Email viewed by Maureen McDonnell (maurahealth55@gmail.com) 2024-06-24 - 9:48:44 PM GMT- IP address: 146.75.222.1
- Document e-signed by Maureen McDonnell (maurahealth55@gmail.com) Signature Date: 2024-06-24 - 9:54:53 PM GMT - Time Source: server- IP address: 174.219.213.251
- Agreement completed. 2024-06-24 - 9:54:53 PM GMT



Megan Hearne Paden

I, _____, a registered voter residing at _____, 141 School Rd, Asheville,NC 28806

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

24/06/24

Paden (Jun 24, 2024 17:33 EDT)

Date

Final Audit Report

2024-06-24

Created:	2024-06-24	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAygzUsg0cHoz-fvvwXylWCu6KTflO7ylC	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 8:54:11 PM GMT- IP address: 64.158.217.230
- Document emailed to Megan Hearne Paden (mhearne414@gmail.com) for signature 2024-06-24 8:54:14 PM GMT
- Email viewed by Megan Hearne Paden (mhearne414@gmail.com) 2024-06-24 - 8:54:21 PM GMT- IP address: 66.249.80.37
- Document e-signed by Megan Hearne Paden (mhearne414@gmail.com) Signature Date: 2024-06-24 - 9:33:53 PM GMT - Time Source: server- IP address: 107.202.16.10
- Agreement completed. 2024-06-24 - 9:33:53 PM GMT

Pascale Birien

I, ______, a registered voter residing at 412 Newburgh Dr, Fayetteville Nc 28311

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

T
Pascale Birlen (Jun 25, 2024 06:45 GMT+2)

Date

Final Audit Report

2024-06-25

Created:	2024-06-24	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAHpQyIrYitmZpC460FkCy9j1uoaG7HgsX	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 8:16:57 PM GMT- IP address: 64.158.217.230
- Document emailed to Pascale Birien (pascalebirien@yahoo.fr) for signature 2024-06-24 - 8:17:02 PM GMT
- Email viewed by Pascale Birien (pascalebirien@yahoo.fr) 2024-06-25 - 4:39:15 AM GMT- IP address: 87.248.116.146
- Document e-signed by Pascale Birien (pascalebirien@yahoo.fr) Signature Date: 2024-06-25 - 4:45:13 AM GMT - Time Source: server- IP address: 90.93.99.129
- Agreement completed. 2024-06-25 - 4:45:13 AM GMT

Patricia Ganci

I, _____, a registered voter residing at 70 28th Ave Dr NW Hickory NC 28601

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

Patricia Ganci

24/06/24 Date

Final Audit Report

2024-06-24

Created:	2024-06-24	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAiF4xMT1q6yMQSFIVt-iwZ_PfWDItmMXg	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 8:52:49 PM GMT- IP address: 64.158.217.230
- Document emailed to Patti Ganci (patrn1959@outlook.com) for signature 2024-06-24 8:52:52 PM GMT
- Email viewed by Patti Ganci (patrn1959@outlook.com) 2024-06-24 - 10:56:38 PM GMT- IP address: 172.58.252.68
- Signer Patti Ganci (patrn1959@outlook.com) entered name at signing as Patricia Ganci 2024-06-24 - 11:00:28 PM GMT- IP address: 172.58.252.68
- Document e-signed by Patricia Ganci (patrn1959@outlook.com) Signature Date: 2024-06-24 - 11:00:30 PM GMT - Time Source: server- IP address: 172.58.252.68
- Agreement completed. 2024-06-24 - 11:00:30 PM GMT

Patrick Hennessey

I, _____, a registered voter residing at _____, Patrick Hennessey

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

Patrick Hennessey Patrick Hennessey (Jun 24, 2024 17:07 EDT)

24/06/24

Date

Final Audit Report

2024-06-24

Created:	2024-06-24	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAASAhsD-3qpyzb_OhPSzd1g7e3aUTG3xkr	

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 8:50:36 PM GMT- IP address: 64.158.217.230
- Document emailed to Patrick Hennessey (pat@mediavisionsonline.com) for signature 2024-06-24 - 8:50:38 PM GMT
- Email viewed by Patrick Hennessey (pat@mediavisionsonline.com) 2024-06-24 - 9:05:58 PM GMT- IP address: 136.175.75.52
- Document e-signed by Patrick Hennessey (pat@mediavisionsonline.com) Signature Date: 2024-06-24 - 9:07:13 PM GMT - Time Source: server- IP address: 136.175.75.52
- Agreement completed. 2024-06-24 - 9:07:13 PM GMT

I, Sarah Fields

5 Green Oak Rd AVL NC 28804

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

24/06/24

n 24, 2024 17:10 EDT)

Date

WTPNC Volunteer Declaration

Final Audit Report

2024-06-24

Created:	2024-06-24	
By:	Ryan Rabah (ryanrabah@gmail.com)	
Status:	Signed	
Transaction ID:	CBJCHBCAABAAIzEOqO9SMP2VAIKq3IGApo1_DEk0tldb	

"WTPNC Volunteer Declaration" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 8:20:45 PM GMT- IP address: 64.158.217.230
- Document emailed to Sarah Fields (mzfields801@gmail.com) for signature 2024-06-24 8:20:50 PM GMT
- Email viewed by Sarah Fields (mzfields801@gmail.com) 2024-06-24 - 9:09:37 PM GMT- IP address: 172.225.214.76
- Document e-signed by Sarah Fields (mzfields801@gmail.com) Signature Date: 2024-06-24 - 9:10:40 PM GMT - Time Source: server- IP address: 174.212.100.250
- Agreement completed. 2024-06-24 - 9:10:40 PM GMT



I, Scott Chamberlin

, a registered voter residing at 75 Towhee Run Pinehurst, NC 28374

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

24/06/24

ott Chamberlin

Date

WTPNC Volunteer Declaration

Final Audit Report

2024-06-24

Created:	2024-06-24
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAS0uuyDsM-N1LKddtkCmZtO3YQAYtiNgR

"WTPNC Volunteer Declaration" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 7:50:14 PM GMT- IP address: 64.158.217.230
- Document emailed to Scott Chamberlin (scott@scottchamberlin.com) for signature 2024-06-24 7:50:18 PM GMT
- Email viewed by Scott Chamberlin (scott@scottchamberlin.com) 2024-06-24 - 7:51:16 PM GMT- IP address: 65.191.192.86
- Document e-signed by Scott Chamberlin (scott@scottchamberlin.com) Signature Date: 2024-06-24 - 7:52:20 PM GMT - Time Source: server- IP address: 65.191.192.86
- Agreement completed. 2024-06-24 - 7:52:20 PM GMT

I, _____, a regist

, a registered voter residing at 17337 Wavecrest Court Cornelius, NC 28031

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24

Jug 25, 2024 00:55 EDT)

Date

WTPNC Volunteer Declaration

Final Audit Report

2024-06-25

Created:	2024-06-25
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAAq_6h3MNjESdnt56K9zlTGHK_34JY76n

"WTPNC Volunteer Declaration" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 1:49:02 AM GMT- IP address: 64.158.217.230
- Document emailed to Shannon Carbone (scarbone9398@gmail.com) for signature 2024-06-25 - 1:49:05 AM GMT
- Email viewed by Shannon Carbone (scarbone9398@gmail.com) 2024-06-25 - 4:53:37 AM GMT- IP address: 172.225.251.81
- Document e-signed by Shannon Carbone (scarbone9398@gmail.com) Signature Date: 2024-06-25 - 4:55:20 AM GMT - Time Source: server- IP address: 174.209.101.115
- Agreement completed. 2024-06-25 - 4:55:20 AM GMT

Tam Munar

I, _____, a registered voter residing at 3605 Harrisburg Drive, Fayetteville, NC 28306

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

24/06/24

24, 2024 14:56 EDT)

Date

WTPNC Volunteer Declaration

Final Audit Report

2024-06-24

Created:	2024-06-24
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAK3tk0oY4bkAghu3uJVFuBdk8KkJ0Dza7

"WTPNC Volunteer Declaration" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 6:44:07 PM GMT- IP address: 64.158.217.230
- Document emailed to Tam Munar (chrisandtammunar@gmail.com) for signature 2024-06-24 - 6:44:10 PM GMT
- Email viewed by Tam Munar (chrisandtammunar@gmail.com) 2024-06-24 - 6:55:00 PM GMT- IP address: 66.249.88.3
- Document e-signed by Tam Munar (chrisandtammunar@gmail.com) Signature Date: 2024-06-24 - 6:56:18 PM GMT - Time Source: server- IP address: 207.193.220.10
- Agreement completed. 2024-06-24 - 6:56:18 PM GMT

Vicki Haislip

I, _____, a registered voter residing at ______, 2307 Rockwood Drive, Sanford, NC

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

24/06/24

Date

WTPNC Volunteer Declaration

Final Audit Report

2024-06-24

Created:	2024-06-24
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAED4G4BtEzDivEgaSnFP8RBKIBqSuGaDE

"WTPNC Volunteer Declaration" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 7:54:09 PM GMT- IP address: 64.158.217.230
- Document emailed to Vicki Haislip (vohaislip@gmail.com) for signature 2024-06-24 - 7:54:12 PM GMT
- Email viewed by Vicki Haislip (vohaislip@gmail.com) 2024-06-24 - 7:56:32 PM GMT- IP address: 66.249.88.2
- Document e-signed by Vicki Haislip (vohaislip@gmail.com) Signature Date: 2024-06-24 - 8:08:32 PM GMT - Time Source: server- IP address: 47.132.127.124
- Agreement completed. 2024-06-24 - 8:08:32 PM GMT

Zen Honeycutt

I, ______, a registered voter residing at ______, Alexander NC - Buncombe county

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

neycutt (3un 24, 2024 17:14 EDT)

24/06/24

Date

WTPNC Volunteer Declaration

Final Audit Report

2024-06-24

Created:	2024-06-24
Ву:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA9joOY3kZaV0Tqldr43lOd3WdZ7uBbdZi

"WTPNC Volunteer Declaration" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-24 - 8:50:00 PM GMT- IP address: 64.158.217.230
- Document emailed to Zen Honeycutt (zenhoneycutt@gmail.com) for signature 2024-06-24 - 8:50:03 PM GMT
- Email viewed by Zen Honeycutt (zenhoneycutt@gmail.com) 2024-06-24 - 9:13:09 PM GMT- IP address: 66.249.88.1
- Document e-signed by Zen Honeycutt (zenhoneycutt@gmail.com) Signature Date: 2024-06-24 - 9:14:16 PM GMT - Time Source: server- IP address: 166.196.82.2
- Agreement completed. 2024-06-24 - 9:14:16 PM GMT

Mark Ortiz

I.

, a registered voter residing at 155 Wankel Dr., Kannapolis, NC 28083

hereby make this declaration regarding my volunteer activities for gathering qualifying petitions for the We The People party in North Carolina.

I state the following:

- I am an unpaid volunteer for the We The People party and have received training specific to signature gathering for We The People party petitions.
- I have engaged with numerous North Carolina voters while obtaining signatures, personally explaining that our objective was to establish a new political party called We The People. I consistently communicated, in my own words, that the party's general purpose and intent includes creating an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates like Robert F. Kennedy, Jr. and those committed to our core values.
- I ensured that every individual I trained for signature gathering, if any, received the same instruction I did.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

Mark Ortiz k Ortiz (Jun 25, 2024 12:37 EDT)

25/06/24

Date

WTPNC Volunteer Declaration Adobe

Final Audit Report

2024-06-25

Created:	2024-06-25
By:	Ryan Rabah (ryanrabah@gmail.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAUYAB5DyYK9azwMeqjwTFL8viBLf7Un8V

"WTPNC Volunteer Declaration Adobe" History

- Document created by Ryan Rabah (ryanrabah@gmail.com) 2024-06-25 - 1:56:56 PM GMT- IP address: 136.57.153.155
- Document emailed to Mark Ortiz (markortizauto@windstream.net) for signature 2024-06-25 1:56:59 PM GMT
- Email viewed by Mark Ortiz (markortizauto@windstream.net) 2024-06-25 - 4:35:14 PM GMT- IP address: 40.142.139.11
- Document e-signed by Mark Ortiz (markortizauto@windstream.net) Signature Date: 2024-06-25 - 4:37:05 PM GMT - Time Source: server- IP address: 40.142.139.11
- Agreement completed. 2024-06-25 - 4:37:05 PM GMT



EXHIBIT F – David Owen Declaration

TRAINER DECLARATION FOR WE THE PEOPLE PARTY

I, **David Owen**, of **Accelevate LLC**, residing at 804 South 17th Street, Grand Forks, North Dakota, 58201, hereby make this declaration regarding my training activities for volunteers gathering signatures and paid petition managers for the petition to qualify We The People party in North Carolina.

I, David Owen, am over eighteen years of age and am competent to make the truthful statements as contained in this declaration.

Accordingly, I hereby state the following:

- I am a paid independent contractor that has worked with We The People party.
- I trained the managers, all of whom are independent contractors, of a professional petitioning firm Accelevate, LLC as well as a large number of unpaid North Carolinian volunteers on best practices in obtaining signatures for We The People party, personally explaining to all that our objective was to establish a new political party. I communicated that both paid and unpaid volunteers should explain to potential petition signers that the party's general purpose and intent included the creation of an independent third party outside of the Duopoly (i.e., Republicans and Democrats) and nominating candidates including but not limited to Robert F. Kennedy, Jr., and those committed to the core values of We The People party.
- I clarified that this petition did not place Robert F. Kennedy Jr., on the ballot, but rather it was to create the Party We The People which had announced its intention through its executive committee to nominate Robert F. Kennedy Jr.
- I met prior with the executive committee of the We The People Party, specifically Ceara the chair of We The People party, who indicated to me that their intent was to nominate Robert F. Kennedy Jr., and as such, we got permission to train volunteers accordingly prior to the Robert F. Kennedy Jr., rally in Raleigh,

TRAINER DECLARATION FOR WE THE PEOPLE PARTY

North Carolina. At that time, Ceara was not a staff member of the Robert F. Kennedy Jr., campaign. Ceara understood and communicated the intent that the We The People party would be to nominate additional candidates to help grow the Party.

- Ceara understood and expressed frustration with the office holders of the two major political parties at the state and local level of North Carolina politics and wanted the We The People party to help create a lasting new third political party in North Carolina to provide independent candidates with a platform to gain access to the North Carolina general election ballot.
- I additionally trained Byron Pargo and Charles Eden, who were the managers of the paid petition effort to qualify the We The People party in North Carolina for Accelevate LLC, over the phone and made sure to tell them they could not say the petition was for the purpose to place Robert F. Kennedy Jr., on the ballot, but rather was to create an new political party that intended to nominate Robert F. Kennedy Jr., and other independent candidates in North Carolina for the ballot. I further made it clear that only registered voters were permitted to sign the petition and that the act of signing the petition did not change their voter registration status. I further reiterated the forgoing to Byron Pargo, in person at the Robert F. Kennedy Jr., rally in Tucson, Arizona prior to the start of the North Carolina paid petition drive to qualify We The People party in North Carolina.
- Based on my personal experience, both Byron Pargo and Charles Eden are the top tier and best petition managers for Accelevate LLC, and I have no reason to believe that they did not carry out my instructions to the paid petitioners.

TRAINER DECLARATION FOR WE THE PEOPLE PARTY

• Every individual I trained for signature gathering received the same comprehensive instruction.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed on:

25/06/24	David Owen (Jun 25, 2024 10:18 CDT)	
Date	Signature	
	David Owen	
	Printed Name	

EXHIBIT G – Jeffery Scott Declaration

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 24CV023631-910

NORTH CAROLINA DEMOCRATIC PARTY,)
)
Plaintiff.)
V.	ý
NORTH CAROLINA STATE BOARD)
OF ELECTIONS, et al.,)
Defendants.)

DECLARATION OF JEFFERY SCOTT

I, Jeffery Scott, hereby declare subject to the penalty of perjury that the following is true and correct to the best of my knowledge:

- I am a registered voter and citizen of North Carolina residing at 1300 Blueberry Lane, Charlotte, NC 28226.
- In June 2017, I was elected as the Chair of the Libertarian Party of Mecklenburg County, where I served with dedication until February 2023.
- 3. During my tenure as a Libertarian, I ran for City Council in District 6 of Charlotte in 2017. The following year, I campaigned for U.S. Congress in District 9, and I re-entered the race in 2019 during a special election. In 2020, I pursued a seat in the NC State Senate for District 37.
- 4. I briefly met with Robert F. Kennedy Jr. in October 2023 at an event he was having in Winthrop in Rock Hill, SC. During this event, I discussed my interest in being a down ballot candidate with him.
- 5. As a candidate for the We The People Party of North Carolina, I am currently running in the 2024 election for the North Carolina State Senate, District 40, challenging a five-

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term incumbent Democrat who had no primary opposition and who has no Republican opposition.

- 6. In February 2024, I engaged with the grassroots by attending the first meetup of We The People volunteers at Sir Edmund Halley's in Charlotte, where I introduced myself and shared insights from my political journey and the dynamics of party politics in North Carolina.
- 7. From February to May of the same year, I was actively involved in gathering petition signatures for We The People at various significant locations including St. Patrick's Day celebrations, Freedom Park, and Central Piedmont Community College.
- 8. On March 16, 2024, I undertook a thorough review of all electoral races in North Carolina to identify potential opportunities for candidates, which I discussed with Ryan Rabah (We The People Vice Chair and Counsel) to strategize our party's approach.
- 9. In May of 2024, as We The People grew closer to achieving certification, I reached out to several individuals with experience in North Carolina politics, including Pat Cotham, Travis Groo, Rob Yates, and Steve DiFiore, to discuss the possibility of them, or others they knew aligned with We The People core values, switching parties and running in competitive races. Additionally, I engaged in conversations about the potential for other candidates to receive endorsements from the We The People Party.
- 10. On July 1, 2024, I formally filed for office, delivering all required documents and the necessary filing fee to the Mecklenburg Board of Elections. Subsequently, on July 22, 2024, I established a campaign bank account and, the following day, filed the Statement of Organization for the Candidate Committee CRO 3500.

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- 11. I subscribe to the core values of the We The People Party and have submitted the necessary form to change my voter party affiliation to We The People.
- 12. I have invested considerable time, money, energy, commitments, and effort into my candidacy and would suffer significant harm if not placed on the ballot.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

My furt

Jeffery Scott

Executed: August 7, 2024

EXHIBIT H – Mark Ortiz Declaration

STATE OF NORTH CAROLINA

COUNTY OF WAKE

NORTH CAROLINA DEMOCRATIC PARTY,

Plaintiff,

v.

NORTH CAROLINA STATE BOARD OF ELECTIONS, et al.,

Defendants.

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 24CV023631-910

DECLARATION OF MARK ORTIZ

I, Mark Ortiz, hereby declare subject to the penalty of perjury that the following is true and correct to the best of my knowledge:

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- I am a registered voter and citizen of North Carolina residing at 155 Wankel Dr., Kannapolis, NC 28083.
- 2. As a candidate for the We The People Party of North Carolina, I am currently running in the 2024 election for the office of Rowan County Commissioner.
- 3. I align with the core values of We The People and have officially submitted the required documents with Rowan County Board of Elections to change my voter registration to reflect this affiliation.
- 4. I am a member of the Executive Committee of We The People Party of North Carolina and proudly serve as the Assistant Treasurer.
- 5. On July 1, 2024, I formally filed for office, delivering all required documents and the necessary filing fee to the Rowan County Board of Elections. Subsequently in July, 2024, I established a campaign bank account and filed the Statement of Organization for the Candidate Committee CRO 3500.

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- 6. On July 4, 2024 I made my first public appearance as a candidate, in the Faith Fourth Parade. At this point, my candidacy was still not official, since the party was still unrecognized, and no reportable contributions or expenditures had changed hands. We The People had a dedicated float consisting of an SUV that had a magnetic sign on it advertising my candidacy. (A friend had that made at his expense and it never changed hands.)
- 7. On July 25, 2024 I opened a campaign bank account at Wells Fargo, using \$700.00 of my own money. The next day on July 26, 2024 I went to the Rowan BoE in person and filed my CRO 2100, CRO 3500, and CRO 3600 forms, and a voter registration application changing my affiliation from Unaffiliated to We The People. My filing fee check cleared in my bank account on July 30, 2024.
- 8. I previously ran in the Democratic primaries for the U.S. House in North Carolina's 8th District in both 2004 and 2006. In 2004, when the district was considered safely Republican, I entered the race to serve as a voice for peace and justice. Despite facing a late challenger supported by the party establishment, my campaign focused on promoting progressive values. My experiences with the Democratic Party, especially during these elections, showed me that the party often serves as a gatekeeper rather than a vehicle for genuine social change, as evidenced by the active support for a more corporate-friendly candidate against me and the unfavorable coverage I received from party-aligned media outlets.
- 9. In Rowan County, where I reside, the political environment is predominantly controlled by the Republican Party, with the Democratic Party struggling to maintain relevance. Since the last Democratic win in a partisan seat in 2008, the party's presence has

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significantly declined. Registered Democrats in the county have decreased from 47.5% of duopoly voters in 2008 to 34.5% today. This decline illustrates a broader issue of localized party monopoly, where one party dominates the political arena. Local party monopoly prevails in most counties in the state, despite neither major party having statewide dominance.

- Encouraged by the lack of Democratic candidates and the clear need for a challenge to one-party rule, I decided to run for the Rowan County Commission under the We The People Party banner.
- 11. My candidacy is not just about seeking office but about fostering a robust dialogue on critical issues and building a foundation for future political engagement through the We The People Party.
- 12. My candidacy under the We The People Party is driven by several key goals and motivations. Firstly, I aim to introduce innovative solutions to pressing community issues that are largely ignored by the existing political establishment. The most obvious of these is the insane runup in housing costs, the corporate takeover of a large portion of our housing, and the attendant huge increase in homelessness. This was primarily caused at the federal level, by the Federal Reserve buying huge quantities of questionable mortgage-backed securities in 2019 and 2020, but there are some things that could be done at the county level. These include: using vacant mill buildings and spec warehouses for emergency homeless shelters, possibly using old, leaky shipping containers indoors to give a person a lockable place to have a bed, a desk, and some belongings; setting up a revolving loan fund to help nonprofit organizations building permanently affordable housing; raising property taxes and using the additional

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proceeds to give every registered voter in the county a stipend. This last idea would claw back some of the wealth that absentee corporate landlords and speculators are sucking out of the county.

13. I hope to broaden the Overton window, expanding the range of political discourse and thought considered acceptable in North Carolina communities. Additionally, I seek to gain a deeper understanding of the lives and concerns of my neighbors, which will inform my advocacy and policy proposals. Finally, my campaign is about building a robust network of individuals committed to resisting corporate-dominated governance and fostering the growth of the We The People Party as a viable alternative for future elections. These efforts are not just about contesting an election but about laying the groundwork for sustained political engagement and change.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Mark Orty

Mark Ortiz

Executed: August 8, 2024

EXHIBIT I – Richard Winger Declaration

STATE OF NORTH CAROLINA

COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION 24CV023631-910

NORTH CAROLINA DEMOCRATIC PARTY,)
Plaintiff,))
V.)
NORTH CAROLINA STATE BOARD OF ELECTIONS, <i>et al.</i> ,)
Defendants)

DECLARATION OF RICHARD WINGER

I, Richard Winger, hereby declare subject to the penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am editor of Ballot Access News, a 39-year-old print publication that covers changes in the ballot access laws that affect minor political parties and independent candidates, and a researcher for that publication, assessing the ballot access laws of all fifty states from 1888 to the present. I have been on the Editorial Board for the *Election Law Journal* since 2001.

2. Candidates who run for President as independents in other states have frequently run as partisan candidates in North Carolina.

3. In 1964, George Wallace created the George C. Wallace Party in North Carolina. In an article published on June 30, 1964, the CHARLOTTE OBSERVER quoted Wallace as saying his party would not have any candidates for office other than president. Wallace dropped his independent presidential campaign a few weeks later, after it became clear that Barry Goldwater would be the Republican nominee, and withdrew his filing in North Carolina.

4. In 1968, George Wallace again ran as an independent presidential candidate. No national political party nominated him. He was not nominated in any national convention. He

used different ballot labels in different states. The three most common were "American", "American Independent" and "George C. Wallace Party." In North Carolina, Wallace appeared on the ballot as the American Party candidate for president.

5. In 1980, John Anderson ran for president as an independent candidate but appeared on the ballot in North Carolina as the nominee of the Independent Party. The party did not have any candidates other than president. No one challenged his right to form the party or appear on North Carolina's ballot as its nominee.

6. In 2012, Americans Elect qualified as a party in North Carolina, and it made plain that its only purpose was to support an independent presidential candidate who would be selected later. Because Americans Elect later decided not to run a candidate for president, it did not appear on North Carolina's 2012 general election ballot.

7. In 2024, No Labels qualified as a party in North Carolina, and had the same plan as Americans Elect in 2012. No one challenged its right to form a party or place its presidential candidate on the ballot.

8. North Carolina is not the only state with a more difficult petition requirement for presidential independent candidates than for new parties. Other such states are Arizona, Colorado, Delaware, Florida, Hawaii, and Texas. In Delaware, Florida, and Hawaii, it is common for independent presidential candidates to create new one-state parties, and no one in either of those states has ever challenged such parties' right to place their presidential nominees on the ballot.

9. In 2024, both Robert F. Kennedy, Jr. and Cornel West created new parties in Hawaii, and West also did in Florida.

10. Non-major party candidates who run for president frequently run as independents in some states, and as the nominees of a political party in other states. Examples include Robert

LaFollette in 1924, Henry Wallace in 1948, George Wallace in 1968, John Anderson in 1980 and Ralph Nader in 2004.

Pursuant to N.C. Gen. Stat. § 7A-98, I declare under penalty of perjury under the laws of North Carolina that the foregoing is true and correct.

Executed: August 7, 2024

Richard Winger

EXHIBIT J – NCGP v NCSBE Court Order

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION No. 5:22-CV-276-D

NORTH CAROLINA GREEN PARTY, et al.,))	
Plaintiffs,))	
v.)	ORDER
NORTH CAROLINA STATE BOARD OF ELECTIONS, et al.,)	
Defendants.)	

On July 14, 2022, the North Carolina Green Party ("the Green Party"), Tony Ndege ("Ndege"), Matthew Hoh ("Hoh"), K. Ryan Parker ("Parker"), Samantha Worrell ("Worrell"), Samantha Spence ("Spence"), Aaron Mohammed ("Mohammed"), and Michael Trudeau ("Trudeau") (collectively, "plaintiffs") filed a complaint against the North Carolina State Board of Elections ("the Board") and its five members in their official capacities (collectively, "defendants") seeking injunctive relief directing defendants to certify the Green Party and place the Green Party's nominees on North Carolina's 2022 general election ballot. <u>See</u> [D.E. 1] 23–24. On July 17, 2022, the Democratic Senatorial Campaign Committee ("the DSCC") and the North Carolina Democratic Party ("the NCDP") (collectively, "intervenors") moved to intervene as defendants [D.E. 15]. On August 5, 2022, the court granted intervenors' motion to intervene [D.E. 64].

On May 8, 2023, intervenors and defendants moved to dismiss for lack of jurisdiction [D.E. 86, 88]. On May 30, 2023, plaintiffs responded in opposition [D.E. 90, 91]. On June 13, 2023,

intervenors and defendants replied [D.E. 92, 93]. On August 7, 2023, the court granted intervenors' and defendants' motions to dismiss and dismissed as moot plaintiffs' action [D.E. 94]. In that order, the court stated "[p]laintiffs may seek costs and attorneys' fees in accordance with 42 U.S.C. § 1988, the Federal Rules of Civil Procedure, and this court's local rules." <u>Id.</u> at 11.

On October 23, 2023, plaintiffs moved for attorneys' fees from intervenors [D.E. 97], filed a memorandum in support [D.E. 98], and requested \$59,268.75. See [D.E. 97] 4. On November 27, 2023, intervenors responded in opposition [D.E. 100]. On December 11, 2023, plaintiffs replied [D.E. 101]. As explained below, the court grants in part plaintiffs' motion for attorneys' fees and awards attorneys' fees in the amount of \$6,525.00.

I.

The North Carolina Green Party is a state affiliate of the Green Party of the United States. See Am. Compl. [D.E. 27] ¶ 6. The Green Party sought to place Hoh and Trudeau on the ballot as candidates in North Carolina's November 8, 2022 general election. See id. at ¶¶ 6, 8–9, 31–32. Although North Carolina recognized the Green Party as a political party with candidates on the 2020 general election ballot, the party failed to garner enough votes to automatically qualify as a political party entitled to place candidates on the 2022 North Carolina general election ballot. See Cox Decl. [D.E. 52] ¶¶ 3–4. Thus, to recertify as a political party and to place Hoh and Trudeau on the ballot as candidates in the 2022 general election, the Green Party had to comply with North Carolina General Statutes §§ 163-96 and 163-98. See id. at ¶ 5; Am. Compl. ¶¶ 21–26; [D.E. 51] 5.

To meet the statutory requirements for certification, the Green Party needed to submit 13,865 valid signatures to the Board by June 1, 2022. <u>See Am. Compl.</u> ¶ 26; [D.E. 52-1] (Green Party petition request form); N.C. Gen. Stat. § 163-96(a)(2). The Green Party's petitions were due to the county boards of elections not later than 5:00 p.m. on May 17, 2022, so that the county boards of elections could validate the Green Party's petition signatures. See Cox Decl. ¶ 5; [D.E. 52-1].

In February 2021, the Green Party began a new petition drive to collect signatures to meet the May 17, 2022 deadline to submit signatures to the county boards of elections for validation. <u>See</u> Am. Compl. ¶ 25; Cox Decl. ¶ 5. Three issues emerged regarding the Green Party's petition drive. First, in October 2021, the Board received queries from county boards in roughly five counties because it appeared that the Green Party had submitted outdated petition sheets. <u>See</u> Cox Decl. ¶ 6. The Board was unable to address that issue with the Green Party at the time. <u>See id.</u> at $\P\P$ 7–8; [D.E. 52-2].

Second, in March 2022, the Green Party told the Board that they did not intend to seek party recognition in 2022 but instead were starting their petition drive for 2024. <u>See</u> Cox. Decl. ¶ 9; [D.E. 52-4]. In response, the Board changed the deadline in the SEIMS Petition Module for the Green Party to submit petitions to county boards until May 17, 2024. <u>See</u> Cox Decl. ¶ 9. When the Green Party later decided to seek certification in 2022, the reversion back to the May 17, 2022 deadline caused confusion. Some county boards accidentally validated signatures submitted after the May 17, 2022 deadline, mistakenly believing they were timely under the May 17, 2024 deadline. <u>See id.</u>

Third, the process to validate petition signatures that the Green Party submitted to county boards of elections was hampered by alleged evidence of fraudulent signatures and county board incompetence. Beginning in April 2022, the Board received notice from some county boards of elections that some of the petitions evinced fraud. See Martucci Decl. [D.E. 53] ¶ 4. The Board received similar information in May and June from other counties. See id. at ¶¶ 8–9. Based on

this information, the Board began to investigate the fraud allegations concerning the Green Party's petitions. See id. at ¶ 3. The Board's investigation found "what appeared to be noticeably fraudulent signatures, largely submitted from three counties, and bearing the signature marks of the same two individuals throughout." Id. at ¶ 11. After meeting with Green Party leadership in June 2022, the Board narrowed its investigation to two persons of interest and possibly a third. See id. at ¶ 19. These persons of interest apparently were connected to consulting firms or individuals that the Green Party hired to assist with signature gathering. See id. at ¶¶ 13, 17–20, 25.

As part of its investigation, the Board determined that "the entire universe of possibly fraudulent signatures was believed to be" 2,653 signatures based on 1,382 signatures collected by the three persons of interest and 1,271 signatures collected by a consulting firm. Id. at ¶ 25. "Board staff examined roughly 3,560 submitted petition pages" to try to identify signatures that fell within the group of possibly fraudulent signatures. Id. at ¶ 21. The Board ultimately identified 1,472 signatures gathered by persons of interest in the investigation. See id. at ¶¶ 23, 25. Of those signatures, the Board accepted 624 signatures and rejected 848 signatures. See id. at ¶ 23.

Board staff also contacted more than 200 voters to ask whether they signed the Green Party petition. See id. at \P 24. Of those that responded, "28 individuals did not sign the petition, 12 did not remember whether they signed, 10 did sign it, and 4 thought they were signing a petition for something else." Id.¹

The process to validate signatures submitted by the Green Party was also delayed by county boards of elections not validating the signature petitions within the two-week window specified in

¹ At the July 18, 2022 status conference, counsel for the Board told the court that there is no allegation from the Board that the Green Party itself committed any fraud.

N.C. Gen. Stat. § 163-96(c) or not properly reviewing the petitions. As for not meeting the twoweek deadline, the Board did not hold the delay against the Green Party so long as the Green Party had submitted the petitions to the relevant county board by 5:00 p.m. on May 17, 2022. See Cox Decl. ¶¶ 11-12. Thus, although the Green Party made a timely initial submission to the Board on June 1, the Green Party supplemented its petitions on June 8, June 17, and June 24 with additional signatures after the county boards validated them. See id. at ¶ 14. Board staff reviewed the petitions as they received them. See id. at ¶ 21. In early July, the Board learned that some county boards of elections were not properly verifying petitions because they "did not check to see whether the signature itself resembled that of the voter." Id. at ¶ 26. This oversight potentially affected "large volumes" of the Green Party's signatures. Id.² On July 11, 2022, the Board's general counsel instructed county boards to conduct proper signature comparisons by July 29, 2022, if they had not already done so. See id. at ¶ 27; [D.E. 52-10].

The Green Party submitted 22,530 signatures to the county boards of elections for validation. See Am. Compl. ¶ 26. As discussed, the county boards of elections reviewed those signatures for (1) signatures on outdated petition pages; (2) signatures submitted after the May 17, 2022 deadline; (3) signatures showing alleged evidence of fraud; and (4) signatures otherwise not bearing a reasonable resemblance to the corresponding signature in the voter record. See Cox. Decl. ¶¶ 17–20.

On June 30, 2022, the Board met and voted 3 to 2 not to certify the Green Party as a new political party under North Carolina General Statute § 163-96(a)(2) because of the Board's

² For example, three counties comprising approximately 40 percent of the Green Party's approved signatures had not conducted the proper signature review. See Cox. Decl. \P 27.

ongoing investigation of alleged fraud. <u>See</u> Am. Compl. ¶¶ 63–74; [D.E. 52-8]; [D.E. 51] 3 & n.2; [D.E. 52-10] 1.

The same day, notwithstanding the Board's vote, the Green Party held its nominating convention. See Am. Compl. ¶31; N.C. Gen. Stat. § 163-98. At the convention, the party selected Matthew Hoh as its candidate for the United States Senate and selected Michael Trudeau as its candidate for North Carolina Senate District 16. See id. On July 1, 2022, Hoh and Trudeau submitted their applications to change their party affiliation to the Green Party, and Ndege, the Green Party's chair, certified Hoh and Trudeau as the Green Party's candidates. See id. at ¶ 32. Trudeau also submitted a notice of candidacy and his candidacy filing fee to the Board and the Wake County Board of Elections. See id. On July 12, 2022, the Board's counsel sent Hoh and Trudeau forms for new party candidates. See id. at ¶ 33. On July 13, 2022, Trudeau submitted the form to the Wake County Board of Elections. See id. at ¶ 33. On July 13, 2022, Trudeau submitted the form to the Wake County Board of Elections. See id. at ¶ 34. The same day, Hoh submitted the form and the candidate filing fee to the Board. See id. The Board did not accept Hoh's submission. See id.

On July 20, 2022, the Board noticed an August 1, 2022 meeting at which the Board anticipated reconsidering the Green Party's petition for certification as a political party. See [D.E. 51] 4; [D.E. 52] \P 28. The same day, the court accepted plaintiffs' and defendants' proposed briefing schedule and scheduled an August 8, 2022 hearing on plaintiffs' motion for a preliminary injunction. See [D.E. 26]. By scheduling the hearing on August 8, 2022, the court allowed the county boards to complete their review by the Board's July 29 deadline and allowed the Board to hold its August 1 meeting and to reconsider the sufficiency of the Green Party's petition for certification as a political party.

After completing their review, the county boards validated 15,472 signatures. See [D.E. 57-1] 11. Thus, as of July 29, 2022, the county boards of elections found that the Green Party submitted 1,607 more signatures than the statutory requirement of 13,865 signatures. See id. On August 1, 2022, the Board met and voted unanimously to certify the Green Party as a new political party. See [D.E. 54]. The Board determined that the Green Party complied with the statutory requirements in North Carolina General Statute § 163-96(a)(2) by timely submitting more than the required number of valid signatures and certified the Green Party as a political party eligible to have its candidates on the November 2022 general election ballot. The Board immediately informed the Green Party of its determination. See [D.E. 54-1].

After the Board certified the Green Party as a North Carolina political party, the court issued an order forecasting plaintiffs' request that the court order the Board to certify the Green Party as moot. <u>See</u> [D.E. 55] 2. The court also noted that plaintiffs and defendants appeared to agree that if the Board certified the Green Party, injunctive relief to ensure the Green Party's candidates appeared on the ballot would be appropriate. <u>See id.</u> at 2–3. The court ordered plaintiffs and defendants to file a proposed consent order resolving that issue or to file competing proposed orders if they could not agree. <u>See id.</u> at 3. They did not agree, and each filed a proposed order on August 3, 2022. <u>See [D.E. 61-1, 63].</u>

On August 5, 2022, the court enjoined defendants in their official capacities from enforcing the July 1 candidate-filing deadline in North Carolina General Statute § 163-98 against the Green Party and its candidates and ordered defendants in their official capacities to place Green Party candidates Hoh and Trudeau on North Carolina's November 8, 2022 general election ballot. <u>See</u> [D.E. 64] 32–33. Intervenors appealed. <u>See</u> [D.E. 65].

On August 8, 2022, intervenors filed an emergency motion to stay. <u>See</u> [D.E. 67]. On August 10, 2022, the court denied intervenors' emergency motion to stay. <u>See</u> [D.E. 74]. On August 11, 2022, the United States Court of Appeals for the Fourth Circuit denied intervenors' emergency motion for stay pending appeal. <u>See</u> [D.E. 75]. On August 30, 2022, the Fourth Circuit dismissed intervenors' appeal under Federal Rule of Appellate Procedure 42(b). <u>See</u> [D.E. 76].

Hoh and Trudeau appeared on the November 2022 ballot. On November 8, 2022, the election was held. Hoh was not elected to the United States Senate, and Trudeau was not elected to the North Carolina Senate.

П.

Generally, "the prevailing party in a suit is not entitled to recover reasonable attorneys fees and costs from the losing party." <u>Brat v. Personhuballah</u>, 883 F.3d 475, 480 (4th Cir. 2018); <u>see</u> <u>Alyeska Pipeline Serv. Co. v. Wilderness Soc'y</u>, 421 U.S. 240, 247 (1975). Congress may carve out exceptions to the general rule, and 42 U.S.C. § 1988(b) "confers discretion on courts to award attorneys fees to the prevailing party in an action brought under, <u>inter alia</u>, 42 U.S.C. § 1983." <u>DeBauche v. Trani</u>, 191 F.3d 499, 510 (4th Cir. 1999).³ When a plaintiff seeks attorneys' fees from losing "blameless" intervenors (i.e., intervenors not liable on the merits of the action), the court may award those fees "only where the intervenors' action was frivolous, unreasonable, or without foundation." <u>Indep. Fed'n of Flight Attendants v. Zipes</u>, 491 U.S. 754, 761 (1989); <u>see</u> <u>Brat</u>, 883 F.3d at 481; <u>Ohio River Valley Env't Coal., Inc. v. Green Valley Coal Co.</u>, 511 F.3d 407, 416 (4th Cir. 2007); <u>Bethune-Hill v. Va. State Bd. of Elections</u>, No. 3:14CV852, 2020 WL 5577824, at *3 (E.D. Va. Sept. 17, 2020) (three-judge court) (unpublished).

³ The parties agree that plaintiffs prevailed in this section 1983 action. <u>See</u> [D.E. 98] 4–5; [D.E. 100] 13–14; <u>cf.</u> [D.E. 94] 11.

Plaintiffs contend that intervenors' actions were "frivolous, unreasonable, or without foundation" because: (1) the court concluded intervenors did not come to court with clean hands; (2) intervenors filed a state court action that allegedly threatened to place the Board in contempt of court; (3) intervenors allegedly used this action to perpetuate false allegations of fraud against plaintiffs; and (4) intervenors asserted frivolous arguments in support of their motion to stay. See [D.E. 98] 14–18.

As for plaintiffs' first argument, plaintiffs contend "[i]ntervenors' attempt to thwart [p]laintiffs' petition drive and to delay the Board's certification of NCGP as a party was patently unreasonable and warrants an award of attorney's fees." [D.E. 98] 15. A court, however, cannot award attorneys' fees on the basis of intervenors' pre-litigation conduct, even where the "intervenors were directly involved in violating the plaintiffs' rights," if intervenors were not "legally responsible for relief on the merits." <u>Bethune-Hill</u>, 2020 WL 5577824, at *5 (quotation omitted). Plaintiffs sought a declaratory judgment that the Board's failure to certify the Green Party as a new political party was unconstitutional and an injunction certifying the Green Party as a new political party entitled to place its candidates on North Carolina's ballot. <u>See</u> Am. Compl. ¶ 93. Intervenors could not have provided the relief plaintiffs sought. <u>See, e.g., Bethune-Hill</u>, 2020 WL 5577824, at *5. Accordingly, this argument fails. <u>See, e.g., Costco Wholesale Corp. v.</u> <u>Hoen</u>, 538 F.3d 1128, 1134 n.2 (9th Cir. 2008) (applying <u>Zipes</u> to "individual claims or arguments advanced by an invervenor" and "their conduct during litigation"); <u>HRPT Props. Tr. v. Lingle</u>, 775 F. Supp. 2d 1225, 1238 (D. Haw. 2011) ("To determine whether [an intervenor] is liable for fees, the Court must ascertain whether [the intervenor]'s manner of litigating was frivolous, unreasonable, or without foundation.").⁴

As for plaintiffs' second argument, plaintiffs contend that intervenors "knew or should have known that [their] attempt to seek" relief in state court "was improper" and "manifestly unreasonable." [D.E. 98] 16. Although intervenors interpret this argument as one for attorney fees incurred in the state action, plaintiffs seek 0.9 hours' worth of attorneys' fees incurred in this action for their attorney to review the state complaint and draft a notice of a related case. See [D.E. 101] 4; [D.E. 97-1] 7; [D.E. 60] (notice of related case). Intervenors contend that "seeking relief from the state courts was in fact the only procedural avenue for seeking review of the Board's application of state law." [D.E. 100] 22–23 (emphasis removed). In response to intervenors' state filing, the court reminded intervenors of the Supremacy Clause. See [D.E. 64] 30–31, 31 n.13. By pursuing this "procedural avenue," the intervenors potentially subjected defendants to contempt of court via inconsistent judgments. See id. Accordingly, intervenors' action in filing the state suit was frivolous. Thus, the court awards plaintiffs 0.9 hours' worth of fees incurred when counsel Oliver Hall reviewed the state complaint and filed a notice of a related case. See [D.E. 101] 4; [D.E. 97-1] 7.

As for plaintiffs' third argument, plaintiffs contend that intervenors' "inflammatory repetition" of false allegations of fraud "appears calculated to cause [p]laintiffs maximum harm in the news media, at the height of what should have been their campaigns for public office" and was "unreasonable." [D.E. 98] 17. The parties merely dispute intervenors' characterization of the

⁴ In their reply, plaintiffs recast their first argument as relying on intervenors' "baseless claim that Plaintiffs 'caused' the Board's delay in certifying [the Green Party] as a new party." [D.E. 101] 3–4. Intervenors, however, made that argument in support of their motion to stay. <u>See</u> [D.E. 67-1] 2–4; [D.E. 74] 4 (rejecting that argument). Accordingly, the court considers that argument concerning intervenors' motion to stay.

Board's investigation. Intervenors, however, had some basis for these allegations. <u>See, e.g.</u>, Martucci Decl. ¶¶ 3, 4, 8–9, 11, 19, 21, 23, 25; [D.E. 52-8]; [D.E. 51] 3 & n.2. "Without more, the mere act of asserting an unsuccessful legal position is not 'frivolous, unreasonable, or without foundation." <u>Bethune-Hill</u>, 2020 WL 5577824, at *5. Accordingly, the court rejects this argument for attorneys' fees. <u>See, e.g.</u>, <u>Democratic Party of Wash. State v. Reed</u>, 388 F.3d 1281, 1288 (9th Cir. 2004); <u>Heald v. Granholm</u>, 457 F. Supp. 2d 790, 792–93 (E.D. Mich. 2006).

As for plaintiffs' fourth argument, plaintiffs contend "[i]ntervenors' arguments in support of their requested stay were frivolous." [D.E. 98] 17–18. Intervenors respond that, although their motion to stay was unsuccessful, the motion was "supported both legally and factually." [D.E. 100] 23–25 (citing <u>Christiansburg Garment Co. v. EEOC</u>, 434 U.S. 412, 420 (1978); <u>Bethune-Hill</u>, 2020 WL 5577824, at *5). Intervenors did not make "a strong showing" of their likelihood of success on the merits in their motion to stay. [D.E. 74] 3 (quotation omitted). "The record flatly contradict[ed] all of" intervenors' arguments. <u>Id</u>. Indeed, intervenors "tilt[ed] at windmills," <u>id</u> at 7 n.2, out of "fear that some voters will vote for the two Green Party candidates instead of the Democratic candidates." <u>Id</u>, at 9. Unlike <u>Bethune-Hill</u>, in which intervenors' position garnered four Supreme Court justices' votes, <u>see Bethune-Hill</u>, 2020 WL 5577824, at *5, intervenors' motion to stay was "without foundation." <u>Zipes</u>, 491 U.S. at 761. Thus, the court awards 12.6 hours' worth of attorneys' fees concerning intervenors' motion to stay for counsel Oliver Hall and 1.5 hours' worth of attorneys' fees concerning intervenors' motion to stay for counsel Pooyan Ordoubadi. <u>See [D.E. 97-1] 7; [D.E. 97-2] 3</u>.

In total, plaintiffs incurred 13.5 hours' worth of attorneys' fees for Oliver Hall's work as a result of intervenors' frivolous actions. Plaintiffs also incurred 1.5 hours' worth of attorneys' fees for Pooyan Ordoubadi's work as a result of intervenors' frivolous actions.

As for the amount of attorney fees, the court begins with "the number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate." <u>Hensley v. Eckerhart</u>, 461 U.S. 424, 433 (1983). Courts refer to this as the "lodestar figure." <u>Robinson v. Equifax Info. Servs.</u> <u>LLC</u>, 560 F.3d 235, 243 (4th Cir. 2009). The court determines the reasonableness of the hours expended and the hourly rate by evaluating:

(1) [t]he time and labor expended; (2) the novelty and difficulty of the questions raised; (3) the skill required to properly perform the legal services rendered; (4) the attorney's opportunity costs in pressing the instant litigation; (5) the customary fee for like work; (6) the attorney's expectations at the outset of the litigation; (7) the time limitations imposed by the client or circumstances; (8) the amount in controversy and the results obtained; (9) the experience, reputation, and ability of the attorney; (10) the undesirability of the case within the legal community in which the suit arose; (11) the nature and length of the professional relationship between attorney and client; and (12) attorneys' fees awards in similar cases.

<u>McAfee v. Boczar</u>, 738 F.3d 81, 88 n.5 (4th Cir. 2013) (quotation omitted); <u>see Barber v.</u> <u>Kimbrell's Inc.</u>, 577 F.2d 216, 226 n.28 (4th Cir. 1978). "These factors are typically subsumed within the lodestar calculation." <u>Bethune-Hill</u>, 2020 WL 5577824, at *6; <u>see McAfee</u>, 738 F.3d at 88–90. Courts may not award attorneys' fees incurred litigating unsuccessful claims. <u>See</u> <u>Hensley</u>, 461 U.S. at 435; <u>McAfee</u>, 738 F.3d at 91; <u>Grissom v. Mills Corp.</u>, 549 F.3d 313, 321 (4th Cir. 2008); <u>Johnson v. City of Aiken</u>, 278 F.3d 333, 337 (4th Cir. 2002); <u>Bethune-Hill</u>, 2020 WL 5577824, at *6 n.4. Courts also may not award attorneys' fees against a party for fees incurred by the prevailing party litigating against a third party. <u>See Brat</u>, 883 F.3d at 484; <u>Rum Creek Coal</u> <u>Sales, Inc. v. Caperton</u>, 31 F.3d 169, 178 (4th Cir. 1994); <u>Bethune-Hill</u>, 2020 WL 5577824, at *10.

Plaintiffs seek \$59,268.75 in total attorneys' fees based on 98.1 hours of work from Oliver Hall at \$450 per hour, plus 10.9 hours of work from Pooyan Ordoubadi at \$300 per hour, multiplied by 1.25. <u>See</u> [D.E. 97] 3; [D.E. 97-1] 7–8; [D.E. 97-2] 3. As discussed, intervenors' frivolous conduct only includes their state action and motion to stay. Accordingly, the court awards attorneys' fees for only that conduct. See Hoen, 538 F.3d at 1134 n.2; cf. Grissom, 549 F.3d at 321. Plaintiffs' remaining requests for attorneys' fees concern actions counsel took in response to defendants, not intervenors. See, e.g., [D.E. 97-1] 8 (listing 33.2 hours spent responding to defendants' motion to dismiss). Accordingly, the court declines to award fees on that basis. Cf. Brat, 883 F.3d at 484; Rum Creek Coal Sales, Inc., 31 F.3d at 178; Bethune-Hill, 2020 WL 5577824, at *10.

The court has considered the novelty and difficulty of the questions plaintiffs' counsel faced, the skill required to properly represent plaintiffs, plaintiffs' attorneys' opportunity costs of this representation, fees for like work, the successful results counsel obtained, and the experience of plaintiffs' attorneys. <u>See McAfee</u>, 738 F.3d at 88 n.5. Oliver Hall reasonably spent 13.5 hours responding to intervenors' frivolous conduct. <u>See [D.E. 97-1]</u> 7–8. Pooyan Ordoubadi reasonably spent 1.5 hours responding to intervenors' frivolous conduct. <u>See [D.E. 97-2]</u> 3. Accordingly, the court uses these figures to calculate plaintiffs' lodestar figure.

As for the reasonableness of the attorneys' hourly rate, plaintiffs must show "that the requested hourly rates are consistent with the prevailing market rates in the relevant community for the type of work for which [they] seek[] an award." <u>McAfee</u>, 738 F.3d at 91 (quotation omitted); <u>see Plyler v. Evatt</u>, 902 F.2d 273, 277 (4th Cir. 1990). Plaintiffs may meet this burden through "affidavits of other local lawyers who are familiar both with the skills of the fee applicants and more generally with the type of work in the relevant community." <u>McAfee</u>, 738 F.3d at 91 (quotation omitted); <u>see Robinson</u>, 560 F.3d at 245; <u>Grissom</u>, 549 F.3d at 323; <u>Plyler</u>, 902 F.2d at 277–78.

Plaintiffs offer two declarations from North Carolina lawyers. <u>See</u> [D.E. 97-3]; [D.E. 97-4]. Both attorneys are familiar with attorneys' market rates in the Raleigh, North Carolina market.

See [D.E. 97-3] ¶ 2, 14, 18; [D.E. 97-4] ¶ 13. Both attorneys familiarized themselves with Oliver Hall's and Pooyan Ordoubadi's work. See [D.E. 97-3] ¶ 15–16; [D.E. 97-4] ¶ 14–15. Both attorneys conclude that Oliver Hall's and Pooyan Ordoubadi's hourly rates are reasonable and comport with the prevailing market rates in the Raleigh, North Carolina community for this kind of case. See [D.E. 97-3] ¶ 17–18; [D.E. 97-4] ¶ 16. Intervenors do not contest plaintiffs' counsels' hourly rates. Accordingly, the court accepts Oliver Hall's and Pooyan Ordoubadi's hourly rates as stated in their declarations. See [D.E. 97-1] 7–8; [D.E. 97-2] 3. Thus, the court calculates the lodestar figures to be \$6,075.00 for Oliver Hall and \$450.00 for Pooyan Ordoubadi for a total of \$6,525.00.

As for plaintiffs' requested multiplier, courts indulge "a 'strong presumption' that the lodestar figure is reasonable." <u>Perdue v. Kenny A. ex rel. Winn</u>, 559 U.S. 542, 554 (2010). Plaintiffs may overcome the presumption in "rare" and "exceptional" circumstances. <u>Id.</u> (quotation omitted); <u>see Blum v. Stenson</u>, 465 U.S. 886, 897–902 (1984). These circumstances include: (1) "where the method used in determining the hourly rate . . . does not adequately measure the attorney's true market value"; (2) where "the attorney's performance includes an extraordinary outlay of expenses and the litigation is exceptionally protracted"; and (3) where "an attorney's performance involves exceptional delay in the payment of fees." <u>Perdue</u>, 559 U.S. at 554–56. Courts also may enhance the lodestar figure through "a contingency multiplier" to "compensate counsel for the risk of not prevailing and therefore being paid nothing under their contingency fee contract" provided plaintiffs show "that without an adjustment for risk the prevailing party would have faced substantial difficulties in finding counsel in the local or other relevant market." <u>Spell v. McDaniel</u>, 824 F.2d 1380, 1403–04 (4th Cir. 1987) (quotations

omitted); see Pennsylvania v. Del. Valley Citizens' Council for Clean Air, 483 U.S. 711, 731–34 (1987) (O'Connor, J., concurring).

Plaintiffs contend they are entitled to enhanced attorneys' fees because plaintiffs "could not have pursued this litigation had Mr. Hall not agreed to represent them <u>pro bono</u> in partnership with Mr. Ordoubadi, who represented Plaintiffs at a reduced rate." [D.E. 98] 12. Plaintiffs, however, fail to cite evidence that either attorney agreed to represent plaintiffs on contingency. Instead, Hall's <u>pro bono</u> representation suggests he expected no compensation at all. Accordingly, plaintiffs fail to show "that a contingency enhancement [is] necessary to insure that competent counsel would . . . be willing to undertake contingency representation" in this case. <u>Spell</u>, 824 F.2d at 1404–05.

Plaintiffs also contend they are entitled to an enhancement because Hall declined to take other cases while representing plaintiffs in this case. <u>See [D.E. 98] 13</u>. An "attorney's opportunity cost," however, "merge[s] into the lodestar calculation." <u>McAfee</u>, 738 F.3d at 89. Generally, courts do not double-count factors that have "already been incorporated into the lodestar analysis." <u>Id.</u> (quotation omitted); <u>see E. Associated Coal Corp. v. Dir., Off. of Workers' Comp. Programs,</u> 724 F.3d 561, 570 (4th Cir. 2013). Plaintiffs fail to justify such double counting. Plaintiffs also fail to cite evidence of any other rare or exceptional circumstance justifying an enhanced fee. Accordingly, the court declines to enhance plaintiffs' attorneys' fees award beyond the lodestar figure.

Ш.

In sum, the court GRANTS IN PART plaintiffs' motion for attorneys' fees [D.E. 97] and awards attorneys' fees in the amount of \$6,525.00. The clerk shall close the case. SO ORDERED. This <u>2</u> day of April, 2024.

JAMES C. DEVER III United States District Judge