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April 8, 2026

Cumberland County Superior Court
Shelley Sawyer, Clerk
205 Newbury Street
Portland, ME 04101

REC'D CLERKS OF
APR 8 12 54 PM '26

Re: Jane Gilbert, Mark Sayre, and Kaitlin v. Shenna Bellows, in her official capacity as the Secretary of State of Maine, and the State Of Maine
Cumberland County Superior Court
Docket No. AP-26-10

Dear Ms. Sawyer:

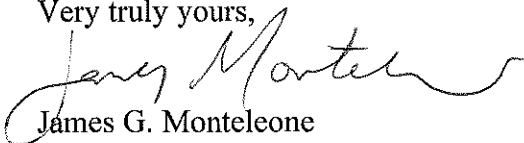
Enclosed for filing in the above-captioned matter, please find the following documents:

1. Petitioners' Motion to Supplement the Record
2. Copies of affidavits marked as Exhibit A-J to the motion*
3. Thumb Drive containing video attachments referenced in the Exhibits

*Due to the expedited nature of this matter, copies of the signed affidavits are being provided with this filing to avoid delay. The copies will be promptly substituted with original signed affidavits when the originals are received.

Thank you for your kind assistance in this regard.

Very truly yours,



James G. Monteleone

Cc: Jonathan Bolton (via email only – jonathan.bolton@maine.gov)
Timothy Woodcock (via email only - twoodcock@katahdin-law.com)
Janna Gau (via email only – jgau@katahdin-law.com)

JGM/bjm
Enclosures

STATE OF MAINE
CUMBERLAND, ss.

SUPERIOR COURT
DOCKET NO. PORSC-AP-2026-10

JANE GILBERT; MARK SAYRE; and
KAITLIN WEBBER,

Petitioners,

v.

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

Respondent.

**PETITIONERS' MOTION TO
SUPPLEMENT THE RECORD**

EXPEDITED ELECTION MATTER
UNDER TITLE 21-A M.R.S. § 905 AND
RULE 80C

REC'D CUMB CLERKS OFC
APR 8 '26 AM 10:09

Pursuant to Maine Rule of Civil Procedure 80C(e) and (f), and 5 M.R.S. § 11006(1)(A) and (2), Petitioners Jane Gilbert, Mark Sayre, and Kaitlin Webber respectfully move this Court to take a discrete category of additional evidence, detailed below, to supplement the administrative record filed in this matter.

INTRODUCTION

This Rule 80C appeal concerns a ballot initiative—“An Act to Designate School Sports Participation and Facilities by Sex” (the “Ballot Initiative”)—that Defendant Secretary of State Shenna Bellows determined to be valid by a small number of signatures. In her March 17, 2026 “Determination of Validity,” the Secretary found 71,033 signatures valid and 8,659 signatures invalid—meaning the initiative exceeded the required threshold of 67,682 signatures by just 3,351 signatures. Pet. ¶¶ 112–13. Petitioners, however, have identified numerous categories of signatures that should have been invalidated by the Secretary, including several based on evidence not available to the Secretary at the time of her determination. *Id.* ¶¶ 52–114. Among the most serious of those issues is circulator fraud: evidence—including video and photographic evidence—that

circulators falsely swore that they personally witnessed all signatures on petition sheets when, in fact, they left these forms unattended or otherwise allowed members of the public to sign outside the circulator's presence. *Id.* ¶¶ 52–57. Petitioners have additionally identified eyewitness evidence that at least some circulators failed to afford signers the opportunity to review the language of the ballot initiative. *Id.* ¶¶ 75–78. Maine law makes clear that such circulator misconduct constitutes material evidence that requires invalidating signatures connected to the offending circulators. *See Reed v. Sec'y of State*, 2020 ME 57, ¶ 8, 232 A.3d 202.

Petitioner's supplemental evidence—which concerns conduct at multiple locations across Maine, on multiple dates, and by multiple circulators associated with the ballot initiative campaign at issue—consists of ten affidavits providing eyewitness testimony of such fraudulent misconduct, oftentimes accompanied by corroborating photographs and videos.¹ Courts routinely accept such “relevant” and “material” evidence in the petition gathering context. *See, e.g., Reed*, 2020 ME 57, ¶ 8 (taking supplemental evidence regarding potentially invalid petitions and signatures where total “number of signatures . . . challenged” by petitioners “could affect the validity of the petition as a whole”); *Palesky v. Sec'y of State*, 1998 ME 103, ¶¶ 3, 9, 711 A.2d 129 (holding remand proper upon State obtaining “newly discovered evidence of fraud” connected to a direct initiative). Here, the evidence at issue is material to the validity of thousands of signatures—and thus potentially the validity of the Ballot Initiative itself. *See Knutson v. Sec'y of State*, 2008 ME 124, ¶ 20, 954 A.2d 1054; *Me. Taxpayers Action Network v. Sec'y of State*, 2002 ME 64, ¶¶ 3, 10, 19, 795 A.2d 75 (“*MTAN*”). Ignoring such incontrovertible evidence of widespread circulator misconduct would do a disservice to Maine voters and the ballot initiative process, as “the integrity of the initiative and referendum process . . . hinges on the trustworthiness and veracity of []

¹ For the Court's reference, they are attached to this Motion as **Exhibits A through J**.

circulator[s].” *MTAN*, 2002 ME 64, ¶ 13. Petitioners therefore respectfully ask the Court to supplement the record with Exhibits A through J so that it may base its decision in this matter on a complete record. Finally, Petitioners further ask that the Court either accept into the record—or take judicial notice of—the Central Voter Registration System (“CVR”), which will serve as the authoritative record for determining whether unregistered voters signed the petition.

BACKGROUND

In Fall 2025, a group called “Protect Girls Sports in Maine” applied to place the Ballot Initiative on the November 2026 ballot. The initiative seeks to force school sports programs and facilities to mandate that participation or use be limited by sex at birth—vitiating Maine’s existing anti-discrimination protections. Pet. ¶ 47.

Four groups submitted applications to circulate petitions for the measure: “Morning in America II,” based in Cave Creek, Arizona; “Canyon State Marketing,” based in either West Covina, California or Tempe, Arizona; “1st Amendment Pros LLC,” based in Sheridan, Wyoming; and “Phil Hendricks (DBA Mainely Strategies),” based in Saint Albans or Augusta, Maine. R0028–51. As Petitioners intend to set forth more fully in their merits briefs, the registration forms for each of these organizations are contain errors and inaccuracies, and the forms for at least three of these organizations were clearly filled out by the same person. These three organizations, in turn, recruited large numbers of paid circulators—many from outside Maine—to collect signatures across the State. Pet. ¶ 48. On February 2, 2026, the circulators submitted 8,067 petition sheets purporting to contain 79,692 valid signatures of Maine voters to the Secretary. *Id.* More than half the submitted signatures are believed to have been collected by out-of-state circulators, who—as described below—were prone to violating Maine’s circulator laws and requirements. *Id.*

On March 17, 2026, the Secretary issued a written Determination of Validity approving the initiative petition entitled, “An Act to Designate School Sports Participation and Facilities by

Sex.” R0001–02. The Secretary determined 71,033 signatures were valid and 8,659 were invalid, concluding the petition exceeded the required threshold by 3,351 signatures. *Id.* On March 27, 2026, Petitioners filed their Petition for Review under Title 21-A M.R.S. § 905(2), 5 M.R.S. § 11001(1), and Rule 80C. *See generally* Pet.

The Petition alleges that a host of errors and improprieties in the signature gathering process require invalidating many thousands of signatures, bringing the Ballot Initiative below the threshold for inclusion on the November 2026 ballot. *See id.* ¶¶ 52–120. Among other things, Petitioners allege the Secretary validated hundreds and possibly thousands of signatures collected by circulators who did not personally witness all signatures on their forms and who thus submitted false oaths and affidavits, as well as at least one who failed to afford signers the opportunity to review the ballot language, among thousands of other legally invalid signatures. *Id.* ¶¶ 49–57, 75–78. The Petition further alleges, based on a comparison to a recent version of the Secretary’s voter file, that several hundred validated signatures came from unregistered voters. *Id.* ¶ 108.

The Secretary filed the administrative record (“AR”) required by Rule 80C on April 6, 2026. The AR does not contain the material evidence of circulator fraud detailed below, or a complete version of the CVR. Plaintiffs promptly filed this motion. *See* Me. R. Civ. P. 80C(e), (f).

LEGAL STANDARD

To facilitate review of a complete record of material facts, Maine Rule of Civil Procedure 80C provides that petitioners may “request that the reviewing court take additional evidence” outside the AR in accordance with the Administrative Procedure Act. Me. R. Civ. P. 80C(e)–(f). Under Section 11006 of that Act, this Court may accept such evidence where the “evidence is material to the issues presented . . . and could not have been presented or was erroneously disallowed in proceedings before the agency.” 5 M.R.S. § 11006(1)(B); *see Reed*, 2020 ME 57, ¶ 8. The Court also has discretion to “remand” the matter and “order the taking of additional

evidence before the agency if it finds that [doing so] is necessary to deciding the petition for review.” *Id.* § 11006(1)(B); *see Palesky*, 1998 ME 103, ¶ 7.²

ARGUMENT

Rule 80C provides a straightforward means to ensure that all evidence potentially relevant to a final agency determination is ultimately included in the record that this Court uses to assess the determination: As long as evidence is “material,” and could not have been considered at the time of the decision, the Court may add it to the record. 5 M.R.S. § 11006(1)(B); Me. R. Civ. P. 80C(e). Here, material evidence of circulator misconduct is readily available but was not available to the Secretary at the time of her Determination. The Court should thus grant Petitioners’ motion.

I. The Secretary could not have considered Petitioners’ newly discovered evidence by the time of the Determination of Validity.

The record shows that while the Secretary received a small number of complaints about circulator misconduct prior to her Determination, the full breadth of the problem—and the evidence establishing it—was not available to her. *See* R0052–94. This evidence “could not have been presented” to the Secretary at the time of the Determination. 5 M.R.S. § 11006(1)(B). Unlike the candidate petition gathering process, which permits challenges to a candidate’s ballot access in proceedings before the Secretary, 21-A M.R.S. § 337(2); *id.* § 356(2), the initiative process does not provide any formal opportunity to provide the Secretary with such evidence, *see id.* § 905. Further still, much of the evidence related to circulator misconduct was not available to Petitioners until after municipal officials and the Secretary validated these signatures, thus permitting Petitioners to discern the identities of the relevant circulators. Indeed, under Maine’s public records laws, the validated signatures and petition sheets were not even available to Petitioners until *after*

² After such additional evidence is received by the Court or by the Secretary, the Secretary “may modify [her] findings and decisions, and shall file with the court, to become part of the record for review, the additional evidence and any new findings or decision.” 5 M.R.S. § 11006(1)(B).

the Determination was made. *See* Pet. ¶ 52; *see also* 1 M.R.S. § 408-A. Thus, only upon review of the accepted petitions and signatures could Petitioners possibly have become aware of the many issues pertaining to their validity set forth in the following section. *See* Pet. ¶¶ 52–114.

Relatedly, only after the Secretary released her Determination—which itself invalidated close to 9,000 signatures—did it become clear to Petitioners that the Ballot Initiative had narrowly cleared the necessary threshold. And only at that time could Petitioners review the validated petition sheets to identify *other* errors that call into question whether the Ballot Initiative validly cleared the necessary threshold. In other words, it was only after the Secretary’s Determination that Petitioners had reason—and the necessary documentation—to fully marshal evidence showing that the Ballot Initiative failed to validly collect enough signatures.

The Law Court has repeatedly approved supplementing the record when post-Determination evidence calls into question the validity of a direct initiative, including when limited review time and lack of evidence frustrate the Secretary’s ability “to conduct a more thorough fraud investigation of the entire petition.” *Reed*, 2020 ME 57, ¶ 12; *see also Jones v. Sec’y of State*, 2020 ME 113, ¶¶ 3–4, 238 A.3d 982 (granting motion to remand for the Secretary to take additional evidence about qualification of petition circulators); *Palesky*, 1998 ME 103, ¶ 7 (explaining purpose of supplementing the record under Rule 80C).

II. Petitioners’ supplemental evidence of circulator fraud is highly relevant and material.

Petitioners’ supplemental evidence should also be admitted because it speaks directly to “the integrity of the initiative and referendum process,” which depends upon the “trustworthiness and veracity of [] circulator[s].” *MTAN*, 2002 ME 64, ¶ 13. The evidence at issue here speaks directly to the “pivotal” role circulators play in the process. *See id.*; *see also Knutson*, 2008 ME 124, ¶ 23; *Reed*, 2020 ME 57, ¶ 4. Indeed, the evidence Petitioners seek to present here is virtually indistinguishable from the sort of evidence courts accepted in *Reed*, and which the Law Court held

required invalidating numerous petition sheets as a matter of law. *Reed*, 2020 ME 57, ¶¶ 8–9, 24.

Specifically, these affidavits and supporting materials proffered by Petitioners each establish that a circulator—at least some of whose petition sheets were validated—violated one or more mandatory requirements of the ballot initiative laws. Each sets forth facts demonstrating either that (1) circulators failed to witness all the signatures on their petition pages, as required by 21-A M.R.S. §§ 902–05, and Article IV, Part 3, sections 18 and 20 the Constitution, and/or (2) a circulator failed to allow signers to view the Ballot Initiative summary, as required by the same. Establishing these facts invalidates the circulator’s petition sheets *as a matter of law* under Law Court precedent. *See, e.g., Knutson*, 2008 ME 124, ¶ 20 (holding that all petitions submitted by circulators who submitted inaccurate affidavits must be invalidated); *MTAN*, 2002 ME 64, ¶¶ 19–21 (holding initiative petitions and signatures submitted in violation of state law must be invalidated). And because Petitioners have alleged a sufficient number of invalid signatures to invalidate the validity of the Ballot Initiative as a whole, the affidavits are indisputably “material” to the Secretary’s Determination and thus this proceeding. *Reed*, 2020 ME 57, ¶ 8.

In compliance with Rule 80C(e), and as set forth more fully in Exhibits A–J, Petitioners submit the following 10 affidavits and accompanying photographs and videos:

- **Exhibit A – Affidavit of Jillian McLeod-Tardiff**. Ms. McLeod-Tardiff on November 4, 2025, at Mt. Ararat High School in Topsham, witnessed a circulator described as a dark-haired male from Texas leave his table, with petition forms, unattended. Ms. McLeod-Tardiff witnessed one person approach the table thereafter, sign the petition, and leave the clipboards with petition forms face up. She observed several additional individuals sign while the circulator was absent. She took two photographs and two videos depicting three separate voters signing the petition while the circulator was absent. *See Attachments 1–4*.
- **Exhibit B — Affidavit of Mary Henderson**. Ms. Henderson on November 4, 2025, at Mt. Ararat High School, witnessed a circulator, described as a male with dark hair from Texas, leave petition pages unattended. Ms. Henderson states that while the circulator was absent, she witnessed one individual arrive and sign the petition. Ms. Henderson observed these events during a different period than McLeod-Tardiff.
- **Exhibit C — Affidavit of Deborah Considine**. Ms. Considine on November 4, 2025, at Mt. Ararat High School witnessed a male circulator, who stated that he was from Texas, leave his table with petition pages unattended. Over the course of the next 45 minutes, Ms. Considine witnessed multiple individuals sign the petition while the circulator was absent. Ms. Considine observed these events during a different time period than the prior two affiants.
- **Exhibit D — Affidavit of Amy Stubbs**. Ms. Stubbs on November 4, 2025, at Thornton Academy in Saco, witnessed a middle-aged woman who had been circulating petitions leave her table, leaving the petitions face

up and unattended. During this absence, Ms. Stubbs witnessed 25 to 30 people sign or mark the petition before the circulator returned roughly 25 minutes later. Ms. Stubbs witnessed the same circulator leave the table with the petitions face up again and approximately 10 additional individuals sign the petition before the circulator returned about 15 minutes later. Ms. Stubbs took three photographs showing the Petition sheets left unattended at the PGSM table, one person signing the Petition in the absence of circulator, and at least five additional persons waiting in line to sign the Petition while it was unattended. *See Attachments 1–3.*

- **Exhibit E — Affidavit of Gabriel LaSalle.** Mr. LaSalle on November 4, 2025, at Thornton Academy, witnessed a circulator described as a middle-aged woman with dark, wavy hair, leave her table with the petition unattended. Mr. LaSalle witnessed about 30 individuals sign the petition while the circulator was absent. Mr. LaSalle is visible at a nearby table in a video showing the Ballot Initiative’s table unattended for about five minutes while people continued to sign or mark the petition. *See Attachment 1.*
- **Exhibit F — Affidavit of Adrian Madanes.** Adrian Madanes on November 4, 2025, at the Green Ladle in the Lewiston Regional Technical Center, witnessed a woman in her 20s from Colorado who said she worked for “1st Amendment Pros” and was being paid per signature gathered, leave petition sheets unattended multiple times. Adrian Madanes witnessed the circulator fold the petition in a manner that prevented signers from seeing the initiative summary. Adrian Madanes estimates witnessing around 200 individuals sign the folded petition without unfolding it to read the language of the ballot initiative.
- **Exhibit G — Affidavit of Tammy E. Taylor.** Ms. Taylor testifies that on December 9, 2025, at the RSU24 Board Meeting in Sullivan, a woman with a clipboard asked her to sign a petition to “protect girls in sports,” which Ms. Taylor declined. After walking to the auditorium stage to add her name to the sign-in sheet for speakers, Ms. Taylor observed a second clipboard containing an unattended copy of the petition on the right-hand corner of the stage next to the sign-in sheet. The petition appeared positioned in a way that gave the misleading impression that people needed to sign it in order to sign in for the meeting, and neither the circulator nor any other person was attending to the petition at that time. Ms. Taylor observed individuals sign the petition on the stage outside the presence of the circulator. During a break in the meeting, Ms. Taylor also witnessed a board member hand the petition to several individuals and tell them to sign it when the circulator was not present.
- **Exhibit H — Affidavit of Roy Gott.** Mr. Gott on December 9, 2025, at the RSU24 Board Meeting in Sullivan, witnessed a woman standing outside the meeting door with a clipboard asking people to sign a petition to “protect girls in sports.” Mr. Gott states on personal knowledge that the woman was Carrie Sandstrom Faulkingham. Separate evidence confirms that Faulkingham did not execute a circulator affidavit.
- **Exhibit I — Affidavit of Michael “Mike” Hein.** Mr. Hein on January 15, 2026, outside the Augusta Bureau of Motor Vehicles, witnessed a circulator gathering signatures from individuals waiting in line to enter the building. As he approached the entrance Mr. Hein noticed the circulator had left dozens of loose petition sheets on a table next to the entrance, and that many of those sheets were partially full of signatures. When he exited the building around 8:30 a.m., Mr. Hein states that the same loose petitions were still on the table unattended, roughly 50 feet from where the circulator was interacting with people in line. Mr. Hein took six photographs depicting, among other things, the unattended petition sheets. *See Attachments 1–6.*
- **Exhibit J — Affidavit of Cynthia Grimm.** Ms. Grimm on December 7, 2025, at Auburn’s Christmas Parade and Tree Lighting, witnessed a circulator approaching people waiting in line, handing them a clipboard, and walking away while leaving the petition with members of the public. Ms. Grimm observed the circulator walk about 15 feet away, stand with his back to the line, and then look at his phone, appearing to photograph or record something. While the circulator was absent, the petition was signed and passed from person to person. The circulator repeated the same behavior with other groups. Ms. Grimm witnessed around 50 individuals sign the petition outside the circulator’s presence. Ms. Grimm took two photographs of this circulator. *See Attachments 1–2.*

If the facts set forth in these affidavits are true, and if at least some (but not necessarily all) further allegations in the Petition are established or accepted by the Court, then the Ballot Initiative failed to obtain and submit a sufficient number of valid signatures to qualify for the November 2026 ballot. The facts represented these affidavits are thus “material” to the proceeding and should be

entered into the record by this Court. *See* 5 M.R.S. § 11006(1)(B); Me. R. Civ. P. 80C(e). And the facts set forth in these affidavits are particularly important to put in the record given the Law Court’s repeated emphasis on the central role played by circulators in the direct initiative process, *see, e.g., MTAN*, 2002 ME 64, ¶ 13, *Knutson*, 2008 ME 124, ¶ 20; *Reed*, 2020 ME 57, ¶ 4.³

III. The Court should take notice of the voter file or deem it admitted into the record.

Finally, the Court should supplement or complete the record with a publicly available version of the CVR. Under Maine law, the CVR is the official source for current and authoritative information on voter registrations in the state. *See* 21-A M.R.S. §§ 161, 172, 194. It is what registrars use to verify registrations of signers who sign petitions. *See* Me. Const. art. IV, pt. 3, § 20; 21-A M.R.S. §§ 161, 902. Maine law also provides a procedure for the public to obtain a set of information from CVR, and federal law requires the information to be made publicly available—subject to applicable privacy law. 21-A M.R.S. § 196-A(1)(B) (making “name, residence address, mailing address, year of birth, enrollment status, electoral districts, voter status, date of registration, date of change of the voter record if applicable, voter participation history, [and] voter record number” available upon request); *see also PILF v. Bellows*, 92 F.4th 36, 53 (1st Cir. 2024) (NVRA preempts certain on public use of this information).

As alleged in the Petition, *see* Pet. ¶ 108, Petitioners compared a recent version of the CVR to the signers validated by the Secretary, and identified numerous voters who appear not to have been registered at the time they signed the petition.⁴ If Petitioners are correct, municipal registrars erred in validating these signatures. Me. Const. art. IV, pt. 3, § 20. The CVR is therefore material to this challenge, as the absence of a signer’s name in it is near-irrefutable evidence that they are

³ Alternatively, if the Court is of the view the Secretary should review the evidence and make determinations in the first instance, it may remand. *Palesky*, 1998 ME 103, ¶ 7.

⁴ Petitioners continue to review and investigate potential non-registered signatories, so as to avoid any unnecessary challenges. They intend to submit a final list of signatures challenged on this basis with their April 10 merits brief.

not registered voters and thus eligible to sign a petition sheet. *See id.* §§ 18, 20; *cf. PILF*, 92 F.4th at 46 (discussing suitability of CVR for use in verifying registration records). In fact, consideration of the CVR may be *required* in a challenge like this, given the Constitution requires “verification[s]” of registrations to be “based” the official list. 5 M.R.S. § 11006(1); *see* Me. Const. art. IV, pt. 3, § 20. There is, however, currently no copy of the CVR in the filed record.

Given the logistical difficulties of placing the entire CVR in the record, Petitioners ask in the first instance that the Court either take judicial notice of the CVR or deem it admitted, so as to preserve the Court’s ability to make its own determination as to whether certain signatories were qualified to sign the Petition. *See* M.R. Evid. 201(b), (c); *Kain v. Sec’y of State*, No. AP-2004-23, 2005 WL 605443, at *3 (Me. Super. Ct. Jan. 21, 2005) (collecting precedent for taking judicial notice in Rule 80C appeals). Alternatively, Petitioners are amenable to providing the Court via its preferred means with the publicly available version of the voter file upon which they based the allegations in the Petition. Pet. ¶ 108. The Court may alternatively wish to reserve this challenge and remand to the Secretary to determine in the first instance whether municipal registrars erred in deeming these signatures valid. *See* 5 M.R.S. § 11006(1)(B); *cf. Reed*, 2020 ME 57, ¶ 8.

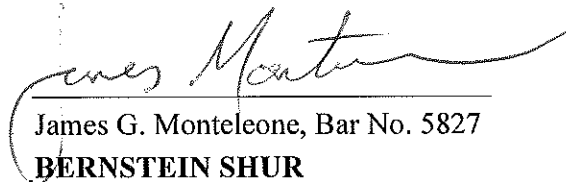
CONCLUSION

For the foregoing reasons, Petitioners respectfully request that this Court:

- A. Grant this Motion to Supplement the Record;
- B. Order that Exhibits A through J, together with their Attachments, be added to and deemed part of the record for purposes of this Rule 80C proceeding;
- C. Order a copy of the central voter file to be included in the record;
- D. Alternatively, remand the matter to the Secretary to take additional evidence and make any necessary revised determinations;
- E. Grant such other relief as is just and proper.

Dated: April 8, 2026

Respectfully submitted,



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/s/ Ben Stafford

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Counsel for Petitioners

** Pro Hac Vice Application Submitted*

NOTICE

Matters in opposition to this Motion pursuant to M.R. Civ. P. 7(c) must be filed not later than 21 days after the filing of this Motion unless another time is provided by the Maine Rules of Civil Procedure or by the Court. Failure to file timely opposition will be deemed a waiver of all objections to the Motion, which may be granted without further notice or hearing.

Exhibit A

AFFIDAVIT OF JILLIAN MCLEOD-TARDIFF

I, Jillian McLeod-Tardiff, duly sworn under oath, do solemnly swear that:

1. I am over the age of 18 and am competent to testify. I have personal knowledge of the facts and information set forth in this declaration.
2. I reside at 6 Robinson Ave in Brunswick, in the State of Maine. I am registered to vote at this address.
3. On November 4, 2025, Election Day, at the polling place located at Mt. Ararat High School, 68 Eagles Way, Topsham, Maine, 04086, from around 12:00pm until 3:30pm, I operated a table to encourage Maine residents to volunteer for Planned Parenthood Maine Action Fund.
4. I sat about six feet away from a table operated by the organization "Protect Girls' Sports In Maine" ("*PGSM*"), which was encouraging Maine residents to sign a petition in support of the ballot initiative called "An Act to Designate School Sports Participation and Facilities by Sex," (the "*Petition*").
5. When I was at Mt. Ararat High School, the *PGSM* table was operated by an individual who encouraged voters to sign the *Petition* (the "*PGSM Circulator*").
6. The *PGSM Circulator* appeared to be a male with dark hair. Over the course of my shift, I learned the *PGSM Circulator* was from Texas.
7. At roughly 1:15pm, the *PGSM Circulator* left the table. Before leaving, the *PGSM Circulator* turned the *Petition* clipboards over, so that they were face down on the table.
8. While the *PGSM Circulator* was absent, I witnessed several individuals approach the table. One flipped the *Petition* clipboards over, signed the *Petition*, and left the *Petition* clipboards face up.

9. I proceeded to see several more individuals approach the table and sign the Petition without the PGSM Circulator present.
10. About forty-five minutes after the PGSM Circulator left, the PGSM Circulator returned. During the period that the PGSM Circulator was absent, I did not see any other person attending the table on PGSM's behalf; just individuals approaching the table, signing the Petition, and walking off.
11. Upon information and belief, I believe others present at Mt. Ararat High School on November 4, 2025, observed the PGSM Circulator engage in the same conduct.
12. It is my understanding that, under Maine law, the circulator of a petition must personally witness all signatures to any petition that the circulator circulates. *See Me. Rev. Stat. Ann. tit. 21-A, §§ 902, 903-A.* The PGSM Circulator was not present when I saw an estimated 12 individuals sign the Petition, as described above.
13. With this affidavit, I am attaching evidence in the form of two photographs and two videos, which I personally took on November 4, 2025, supporting my statements herein. These photographs and videos depict three separate voters signing the Petition while the PGSM Circulator was not present at the PGSM table.
14. I further testify that I witnessed an additional 7 voters sign the Petition while the PGSM Circulator was not present at the PGSM table, of whom I did not take photos or videos.

[Signature Page to Follow.]

DATED this the 0 day of April, 2026.

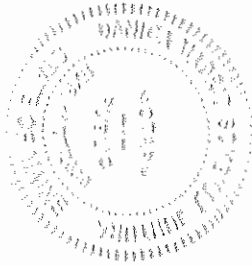
[Handwritten Signature]

Signature of Affiant

STATE OF MAINE

CITY/COUNTY OF Cumberland) ss:

Acknowledged, subscribed, and sworn to before me this 0th day of April, 2026.

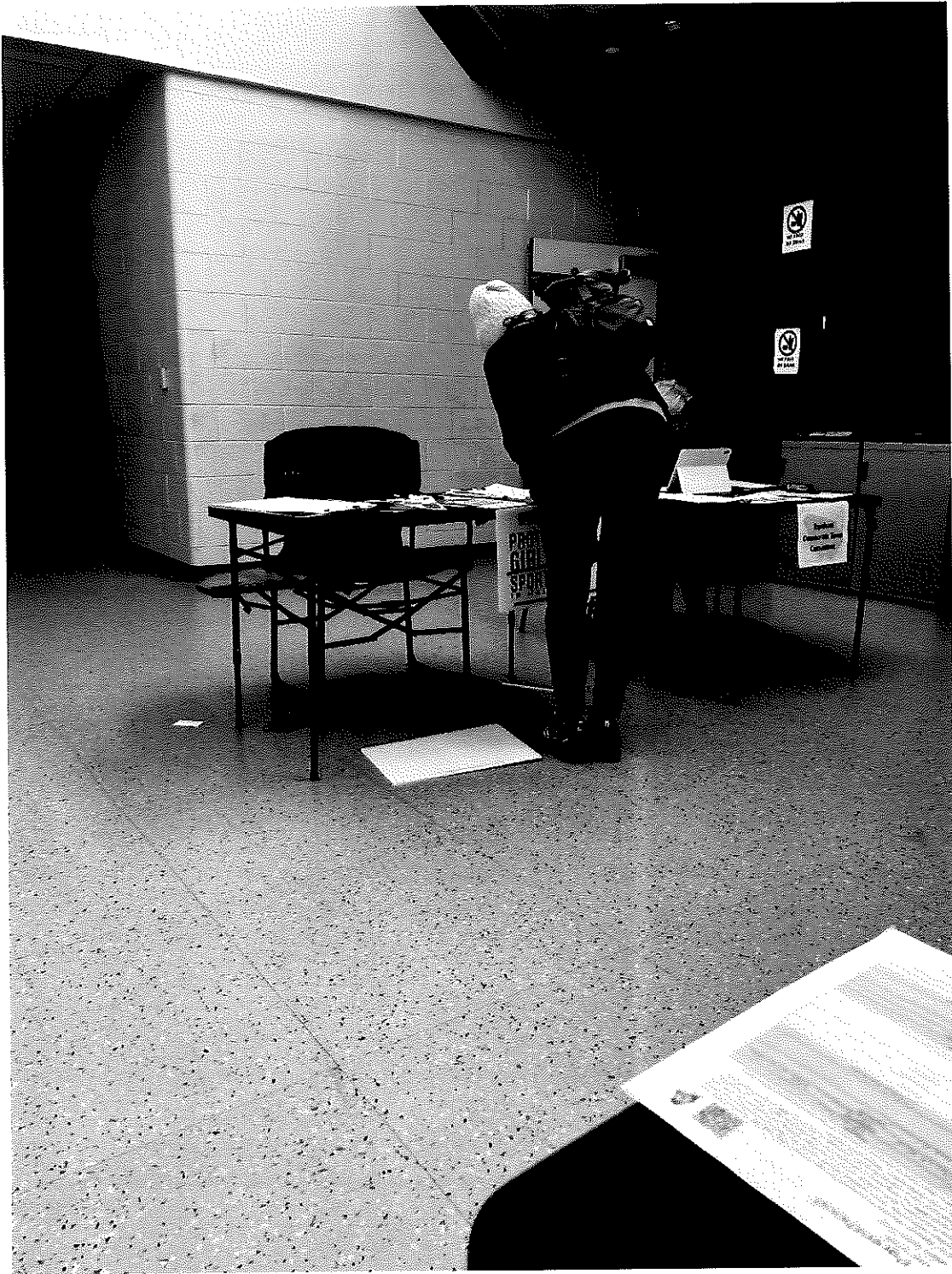


[Handwritten Signature]
Notary Public

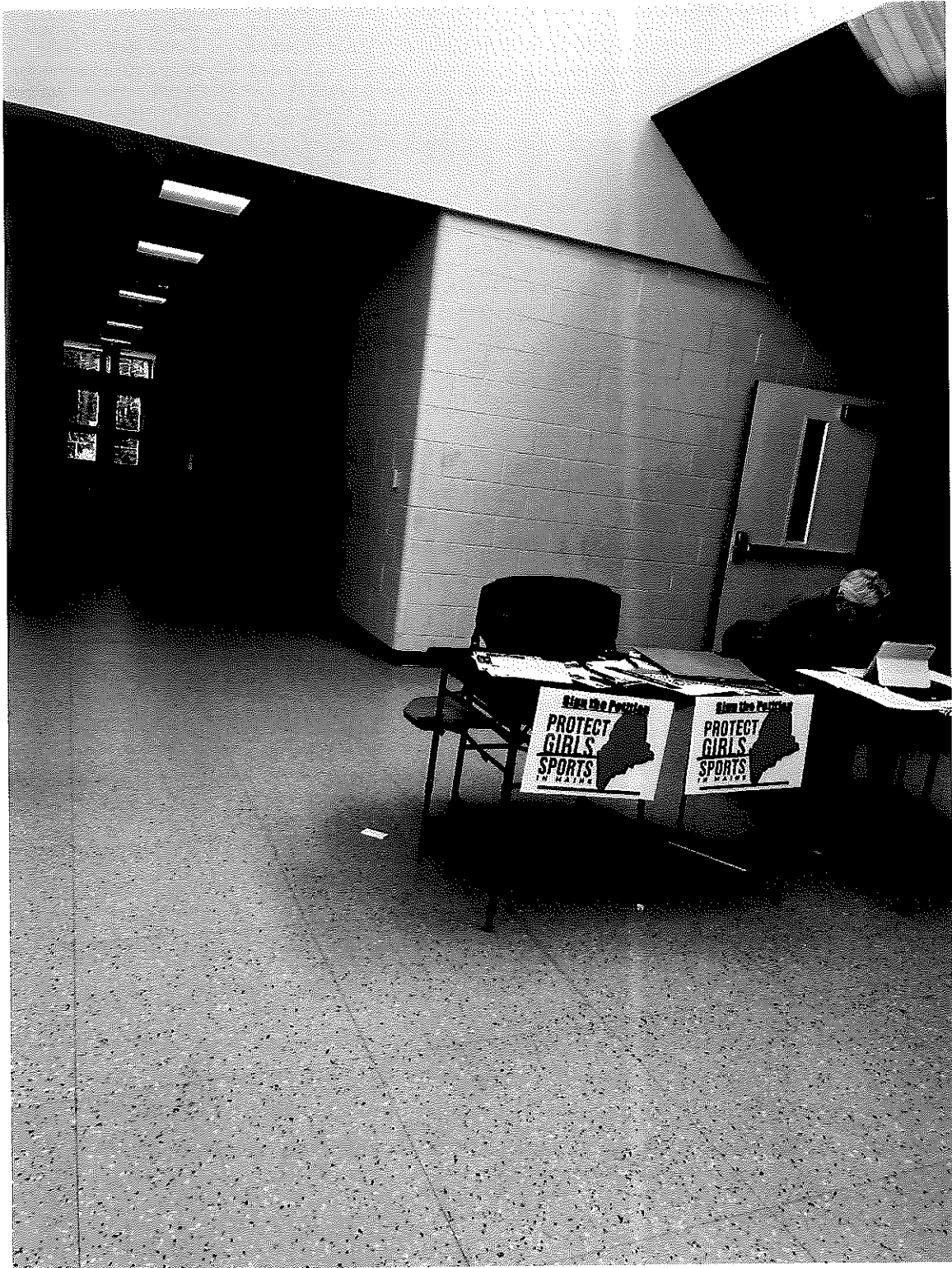
Notary Registration Number: _____ Danica Madrid Sombilla Juntura
Notary Public

My Commission Expires: _____ Maine
Commission Expires: 11/07/2030

Attachment 1



Attachment 2



Attachment 3

Video file submitted to court separately.

Attachment 4

Video file submitted to court separately.

Exhibit B

AFFIDAVIT OF MARY T. HENDERSON

I, Mary T. Henderson, duly sworn under oath, do solemnly swear that:

1. I am over the age of 18 and am competent to testify. I have personal knowledge of the facts and information set forth in this declaration.
2. I reside at 69 Winter Street in Topsham, in the State of Maine. I am registered to vote at this address.
3. On November 4, 2025, Election Day, at the polling place located at Mt. Ararat High School, 68 Eagles Way, Topsham, Maine, 04086, from around 8:00am until 11:00am, I operated a table to collect contact information for anyone interested in volunteering for the Topsham Democrats or joining the Topsham Democrats mailing list.
4. Between ten and twenty minutes after the polls opened, I observed an individual arrive and set up a table for the organization "Protect Girls' Sports In Maine" ("PGSM"), to encourage Maine residents to sign a petition in support of the ballot initiative called "An Act to Designate School Sports Participation and Facilities by Sex," (the "Petition").
5. This individual (the "PGSM Circulator") was a male with dark hair. Over the course of my shift, I learned he was from Texas.
6. Moments later, the PGSM Circulator left the table, leaving the petition on the table, face up, and unattended.
7. At this time, I witnessed one voter arrive and sign the Petition without the PGSM Circulator present.
8. The PGSM Circulator then returned.
9. Upon information and belief, I believe at least one other person present at Mt. Ararat High School on November 4, 2025, observed the PGSM Circulator engage in the same conduct.

10. It is my understanding that, under Maine law, the circulator of a petition must personally witness all signatures to any petition that the circulator circulates. See Me. Rev. Stat. Ann. tit. 21-A, §§ 902, 903-A. The PGSM Circulator was not present when I saw one individual sign the Petition.

[Signature Page to Follow.]

DATED this the 6 day of April, 2026.

Mary T. Handers

Signature of Affiant

STATE OF MAINE

CITY/COUNTY OF Cumberland) ss:

Acknowledged, subscribed, and sworn to before me this 6 day of April, 2026.

Wanda Jones
Notary Public

Notary Registration Number: N/A

My Commission Expires: NOV 12, 2032



Exhibit C

AFFIDAVIT OF DEBORAH CONSIDINE

I, Deborah Considine, duly sworn under oath, do solemnly swear that:

1. I am over the age of 18 and am competent to testify. I have personal knowledge of the facts and information set forth in this declaration.
2. I reside at 7 Twin Pond Road, Topsham, in the State of Maine. I am registered to vote at this address.
3. On November 4, 2025, Election Day, at the polling place located at Mt. Ararat High School, 68 Eagles Way, Topsham, Maine, 04086, from approximately 11:00am until 2:00pm, I operated a table to collect contact information for anyone interested in volunteering for the Topsham Democrats or joining the Topsham Democrats mailing list.
4. Next to me was an individual who operated a table for the organization "Protect Girls' Sports in Maine" ("PGSM"), to encourage Maine residents to sign a petition in support of the ballot initiative called "An Act to Designate School Sports Participation and Facilities by Sex," (the "*Petition*").
5. This individual (the "*PGSM Circulator*") appeared to be a male. I overheard him state to another individual that he was originally from Texas.
6. The PGSM Circulator told me that his boss would not allow him to take a lunch break.
7. At approximately noon, the PGSM Circulator told me that his boss had allowed him to take a lunch break.
8. The PGSM Circulator then left. He left the Petition pages on the table.
9. Over the course of the next forty-five minutes, while the PGSM Circulator was absent, I observed multiple individuals sign the Petition.
10. Upon information and belief, I believe others present at Mt. Ararat High School on November 4, 2025, observed the PGSM Circulator engage in the same conduct.

11. It is my understanding that, under Maine law, the circulator of a petition must personally witness all signatures to any petition that the circulator circulates. *See Me. Rev. Stat. Ann. tit. 21-A, §§ 902, 903-A.* The PGSM Circulator was not present when I saw multiple individuals sign the Petition, as described above.

[Signature Page to Follow.]

DATED this the 6th day of April, 2026.

Deborah Cousidine

Signature of Affiant

STATE OF MAINE

) ss:

CITY/COUNTY OF Sagadahoc)

Acknowledged, subscribed, and sworn to before me this 6th day of April, 2026.

Ryan Lilley
Notary Public

Notary Registration Number: _____

My Commission Expires: _____

RYAN S. LILLEY
Notary Public, State of Maine
My Commission Expires Mar 12, 2031

Exhibit D

AFFIDAVIT OF AMY STUBBS

I, Amy Stubbs, duly sworn under oath, do solemnly swear that:

1. I am over the age of 18 and am competent to testify. I have personal knowledge of the facts and information set forth in this declaration.
2. I reside at 28 Cutts Ave, Unit 202 in Saco, in the State of Maine. I am registered to vote at this address.
3. On November 4, 2025, Election Day, at the polling place located in the gymnasium of Thornton Academy, located at 438 Main Street, Saco, Maine 04072, from 11:00am until 2:00pm, I operated a table to encourage Maine residents to volunteer for Planned Parenthood Maine Action Fund.
4. As I was setting up this table, an individual from the organization "Protect Girls' Sports In Maine" ("*PGSM*") set up a table to encourage Maine residents to sign a petition in support of a ballot initiative called "An Act to Designate School Sports Participation and Facilities by Sex," (the "*Petition*").
5. This individual was a woman who appeared to be over forty years old (the "*PGSM Circulator*"). She had long, dark brown or black hair.
6. At around 12:00pm, the *PGSM Circulator* left the *PGSM* table. The *PGSM Circulator* left the Petitions face up on the table.
7. While the *PGSM Circulator* was absent, I saw about twenty-five to thirty people sign the Petition.
8. Roughly twenty-five minutes after the *PGSM Circulator* left, the *PGSM Circulator* returned.
9. Later that afternoon, around 1:50pm, the *PGSM Circulator* left the table again. Again, they left the Petitions face up on the table.

10. This second time the PGSM Circulator was absent, approximately ten individuals lined up and signed the Petition.
11. The PGSM Circulator returned roughly fifteen minutes later.
12. During the times that the PGSM Circulator left and was not present with the Petitions, I did not see any other person attending the table on PGSM's behalf.
13. It is my understanding that, under Maine law, the circulator of a petition must personally witness all signatures to any petition that the circulator circulates. *See Me. Rev. Stat. Ann. tit. 21-A, §§ 902, 903-A.* The PGSM Circulator was not present when I saw an estimated forty individuals sign the Petition, as described above.
14. With this affidavit, I am attaching evidence in the form of three photographs, which I personally took on November 4, 2025, supporting my statements herein. These photographs show the Petition sheets left unattended at the PGSM table, one voter signing the Petition in the absence of the PGSM Circulator, and at least five additional voters waiting in line to sign the Petition.

[Signature Page to Follow.]

DATED this the 09 day of April, 2026.

[Handwritten Signature]

Signature of Affiant

STATE OF MAINE

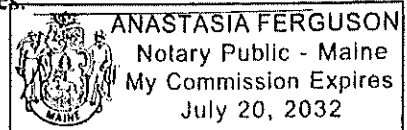
CITY/COUNTY OF Saco) ss:
York)

Acknowledged, subscribed, and sworn to before me this 09 day of April, 2026.

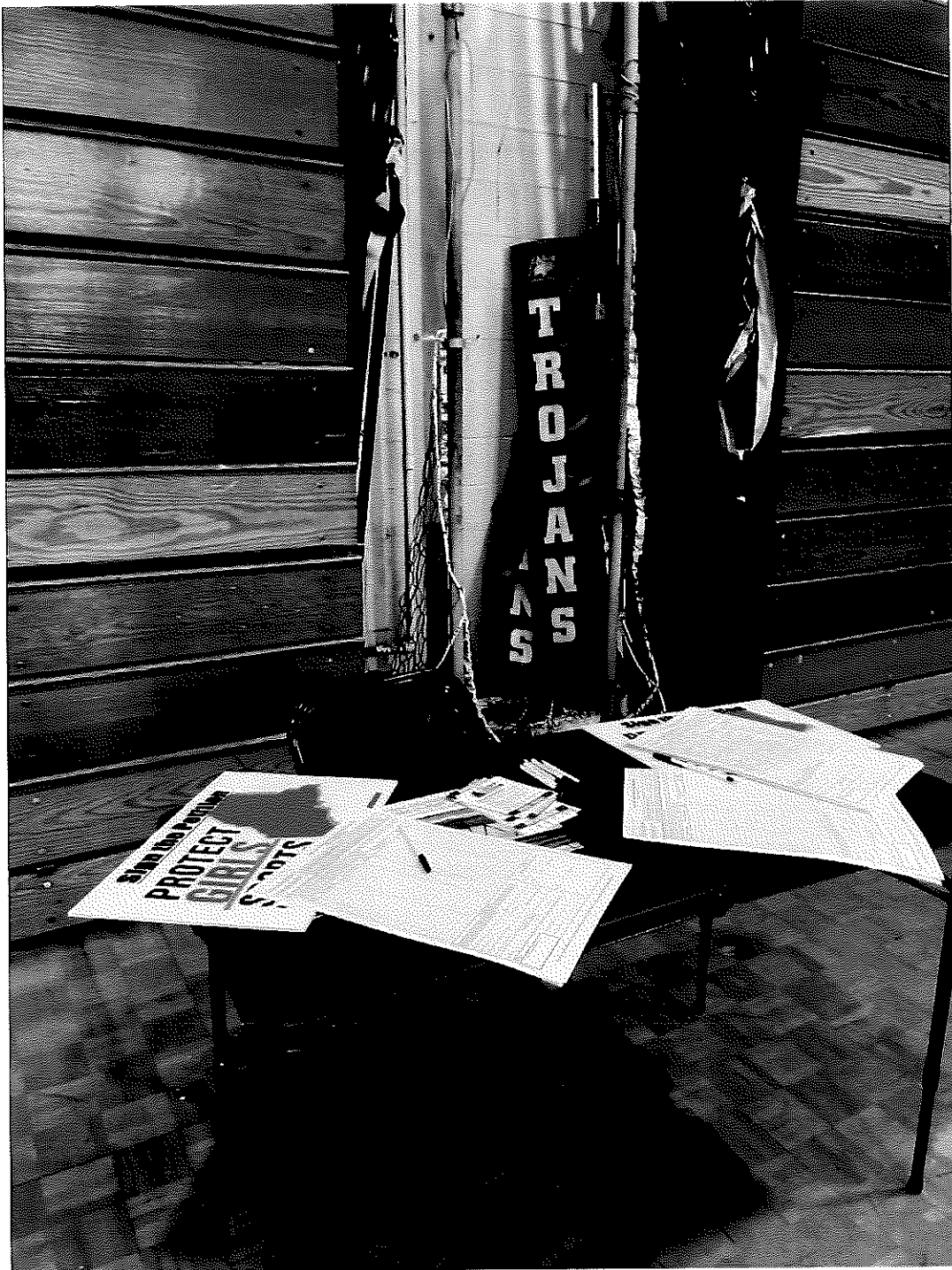
Anastasia Ferguson
Notary Public

Notary Registration Number: 106408

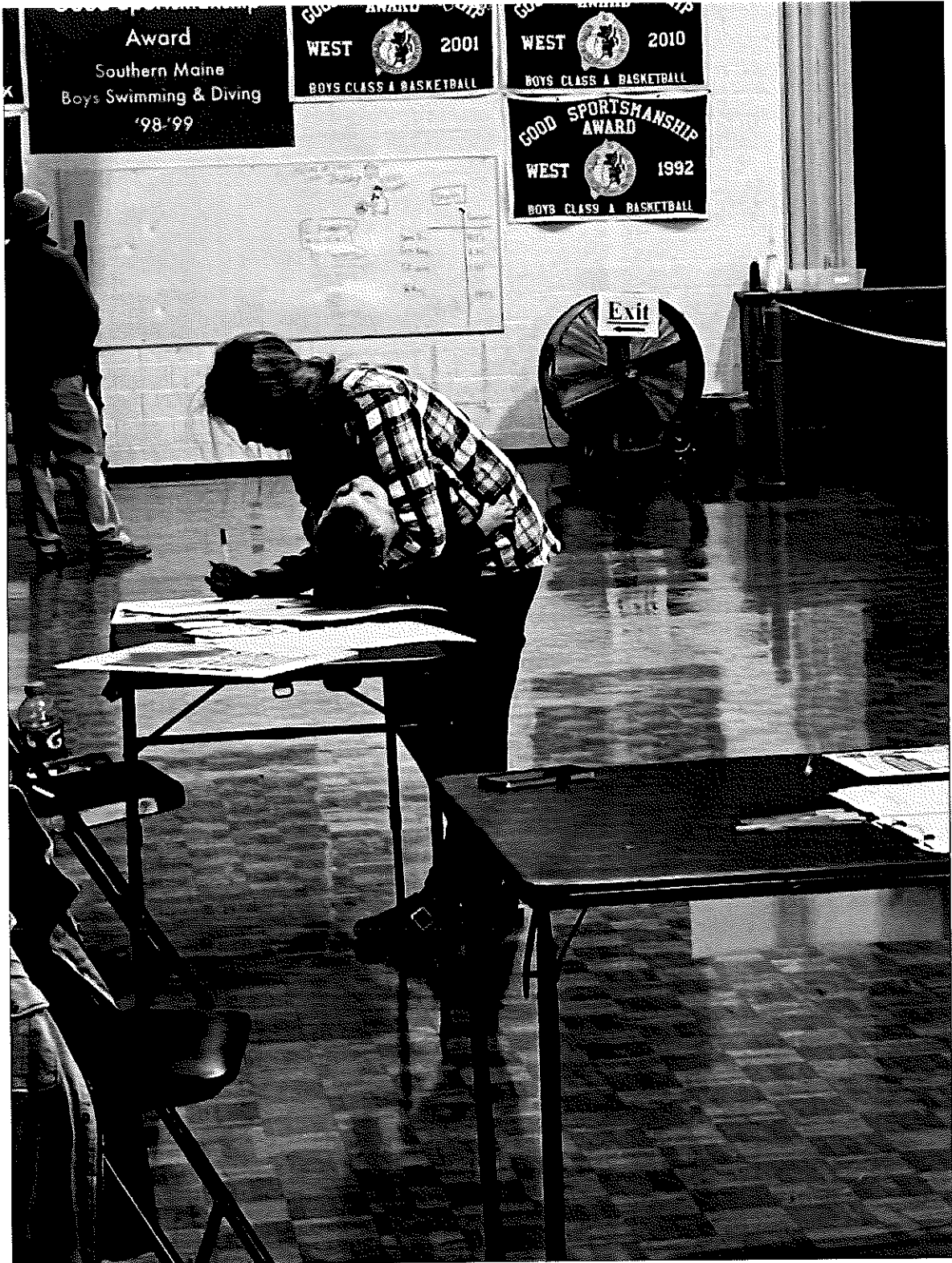
My Commission Expires:



Attachment 1



Attachment 2



Attachment 3



Exhibit E

AFFIDAVIT OF GABRIEL LASALLE

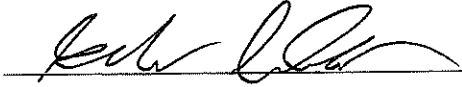
I, Gabriel LaSalle, duly sworn under oath, do solemnly swear that:

1. I am over the age of 18 and am competent to testify. I have personal knowledge of the facts and information set forth in this declaration.
2. I reside at 9 Hilltop Drive in Old Orchard Beach, in the State of Maine. I am registered to vote at this address.
3. On November 4, 2025, Election Day, at the polling place located in the gymnasium of Thornton Academy, located at 438 Main Street, Saco, Maine 04072, from 2:00pm until 8:00pm, I operated a table to sign up volunteers for the Maine People's Alliance.
4. About six to ten feet to the left of my table was a table for the organization "Protect Girls' Sports in Maine" (*PGSM*), to encourage Maine residents to sign a petition in support of the ballot initiative called "An Act to Designate School Sports Participation and Facilities by Sex," (the "*Petition*").
5. The table was operated by an individual who appeared to be a woman (the "*PGSM Circulator*"). She had dark, wavy hair, and appeared to be middle-aged.
6. Just after 2:00pm, the *PGSM Circulator* left the table and left the *Petition* on the table.
7. The *PGSM Circulator* returned around 2:30pm.
8. While the *PGSM Circulator* was absent, I saw about 30 individuals sign the *Petition*.
9. Another person present at Thornton Academy at the time recorded a video of the *PGSM* table on their phone, in which I am also visible at a nearby table. This video also shows that the *PGSM Circulator* left her *Petition* sheets unattended while people continued to sign or mark the *Petition*.
10. It is my understanding that, under Maine law, the circulator of a petition must personally witness all signatures to any petition that the circulator circulates. *See Me. Rev. Stat. Ann.*

tit. 21-A, §§ 902, 903-A. The PGSM Circulator was not present when I saw an estimated 30 individuals sign the Petition, as described above.

[Signature Page to Follow.]

DATED this the 6th day of April, 2026.



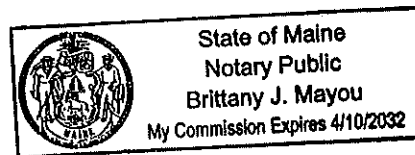
Signature of Affiant

STATE OF MAINE
COUNTY OF CUMBERLAND

PERSONALLY APPEARED the above-named Gabriel LaSalle, this 6th day of April, 2026 and made oath that the foregoing is true and accurate based upon their own knowledge, information or belief, and so far as upon information or belief, they believe this information to be true.



Notary Public



Attachment 1

Video file submitted to court separately.

Exhibit F

AFFIDAVIT OF AMANDA (ADRIAN) MADANES

I, Amanda (Adrian) Madanes, duly sworn under oath, do solemnly swear that:

1. I am over the age of 18 and am competent to testify. I have personal knowledge of the facts and information set forth in this declaration.
2. I reside at 133 Lisbon Street in Lewiston, in the State of Maine. I am registered to vote at this address.
3. On November 4, 2025, Election Day, at the polling place located at The Green Ladle in the Lewiston Regional Technical Center, 156 East Avenue, Lewiston, Maine 04240, from approximately 1:30p.m. until the close of the polls, I operated a table to sign up volunteers for the Maine People's Alliance.
4. Next to me was an individual who operated a table for the organization "Protect Girls' Sports in Maine" ("PGSM"), to encourage Maine residents to sign a petition in support of the ballot initiative called "An Act to Designate School Sports Participation and Facilities by Sex," (the "Petition").
5. This individual (the "PGSM Circulator") appeared to be a woman in her twenties. The PGSM Circulator told me she was from Colorado. She also informed me she was being paid per signature she gathered and worked for 1st Amendment Pros.
6. Over the course of my shift, I witnessed the PGSM Circulator fold the Petition on a clipboard in a manner that prevented signers from seeing the initiative summary.
7. I witnessed around 200 individuals sign the folded Petition without unfolding the Petition to read the initiative summary.
8. I further witnessed the PGSM Circulator leave the table multiple times, leaving the Petition sheets face up on the table.

9. It is my understanding that, under Maine law, the circulator of a petition must provide a voter with the opportunity to read the direct initiative summary and fiscal impact statement of the petition prior to the voter signing the petition. See Me. Rev. Stat. Ann. tit. 21-A, §§ 901, 901-A(1). By routinely folding the Petition, the PGSM Circulator appeared not to provide voters with this opportunity.

Amanda Madanes 4/7/26 [Signature Page to Follow.]

State of Maine
County of Androscoggin

The foregoing instrument was acknowledged before me
this 7 day of April, 2024, at Lewiston,
Maine, by Amanda Madanes
to be his/her free act and deed.

Erica L. Soiett

ERICA L. SOIETT
Notary Public, State of Maine
My Commission Expires Oct. 5, 2026

Exhibit G

AFFIDAVIT OF TAMMY E. TAYLOR

I, Tammy E. Taylor, duly sworn under oath, do solemnly swear that:

1. I am over the age of 18 and am competent to testify. I have personal knowledge of the facts and information set forth in this declaration.
2. I reside at 135 Dority Farm Rd. in Mariaville, in the State of Maine. I am registered to vote at this address.
3. On December 9, 2025, I attended the Board Meeting of Regional School Unit 24 (the "*RSU24 Board Meeting*") at the Sumner Memorial High School at 2456 US-1, Sullivan, Maine 04664.
4. I arrived at the meeting around 6:15pm, and while walking into the meeting, a middle aged woman with brown hair a clipboard (the "*Circulator*") asked me if I would sign a petition to "protect girls in sports" (the "*Petition*"). I declined.
5. I then walked to the auditorium stage to add my name to a list of individuals who wished to speak at the meeting (the "*Sign-In Sheet*").
6. While adding my name to the Sign-In Sheet, I observed there was a second clipboard on the auditorium stage. This clipboard contained an unattended copy of the Petition. The Petition was on the right-hand corner of the stage, next to the Sign-In Sheet. It was several feet away from the people on stage, who were sitting at a table and who may not have been able to see the Petition from their vantage point, and certainly not any details on it. Similarly, the Petition was several feet away from the closest Board meeting attendees, who sat in the auditorium seats. No one was standing or sitting next to the Petition.
7. It appeared to me that the Petition was positioned in a way to give the misleading impression that people needed to sign the Petition in order to sign in to speak at the

meeting. Furthermore, so far as I could observe, neither the Circulator nor any other person was attending to the Petition at this time. This can be seen at approximately the 0:56 mark in the official recording of the RSU24 Board Meeting, entitled “December 9th 2025 RSU Board Meeting” (the “*Board Meeting Recording*”), available here: <https://www.youtube.com/watch?v=kLNz3TmdfLI>. The image below shows in a red box where the Sign-in Sheet and Petition were located on the floor of the stage.



8. Between the time I signed the Sign-in Sheet, and when the meeting began around 6:30pm, I observed about twenty individuals signing the Petition on the auditorium stage, outside the presence of the Circulator or of any other individual. That is, no one was standing or sitting next to this clipboard observing the individuals who signed the Petition.
9. Shortly after the RSU24 Board Meeting began at 6:30pm, the meeting moderator (the “*Moderator*”) sitting on the lefthand side of the stage asked for the Sign-In Sheet.
10. In response, a woman approached the front of the stage, picked up both the Sign-In Sheet and the Petition, and handed both the Sign-in Sheet and the Petition to the Moderator. This can be seen at approximately the 6:40 mark in the Board Meeting Recording. In other words, during this time, the Petition was not in the possession of the Circulator.

11. During a break in the meeting, at around 8:05pm , I observed a Board member named Carla Jung hand the Petition to several individuals and tell them to sign it, which several of them did. Ms. Jung did not explain to these individuals what the Petition was for. There was no discussion of its contents before, during, or after these individuals signed the Petition. It was not clear to me whether Ms. Jung took the Petition sheets from the Moderator's table, or obtained additional Petition sheets from elsewhere, but so far as I could tell, the Circulator was not present when Ms. Jung began asking others to sign the Petition.

12. It is my understanding that, under Maine law, the circulator of a petition must personally witness all signatures to any petition that the circulator circulates. *See Me. Rev. Stat. Ann. tit. 21-A, §§ 902, 903-A.* Neither the Circulator, nor any other individual, was present when I saw about twenty individuals sign the Petition on the auditorium stage.

[Signature Page to Follow.]

DATED this the 7th day of April, 2026.

[Handwritten Signature]

Signature of Affiant

STATE OF MAINE

CITY/COUNTY OF Hancock) ss:

PERSONALLY APPEARED the above-named Tammy Taylor this 7th day of April, 2026 and made oath that the foregoing is true and accurate based upon their own knowledge, information or belief, and so far as upon information or belief, they believe this information to be true.

[Handwritten Signature]
Notary Public

Notary Registration Number: _____

My Commission Expires: June 12 2031

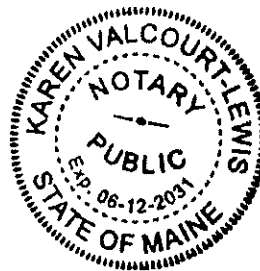


Exhibit H

AFFIDAVIT OF ROY GOTT

I, Roy D. Gott, duly sworn under oath, do solemnly swear that:

1. I am over the age of 18 and am competent to testify. I have personal knowledge of the facts and information set forth in this declaration.
2. I reside at 10 Main Street Floor 2 in Franklin, in the State of Maine. I am registered to vote at this address.
3. On December 9, 2025, I attended the Board Meeting of Regional School Unit 24 (the "*RSU24 Board Meeting*") at Sumner Memorial High School at 2456 US-1, Sullivan, Maine 04664.
4. I arrived at approximately 6:00 PM. When walking into the school, I observed a woman with a clipboard standing outside the door to the RSU24 Board Meeting asking people if they would sign a petition to "protect girls in sports" (the "*Petition*").
5. I can confirm based on personal knowledge that the woman circulating the Petition outside of the Board Meeting that day was Carrie Sandstrom Faulkingham. Carrie Sandstrom Faulkingham is a young woman with brown hair.
6. It is my understanding that a paid circulator in the State of Maine must be registered with the Secretary of State. Me. Rev. Stat. Ann. tit. 21-A, § 903-A(5).

DATED this the 6th day of April, 2026.

[Handwritten Signature]

Signature of Affiant

STATE OF MAINE

CITY/COUNTY OF Franklin / Hancock) ss:)

Acknowledged, subscribed, and sworn to before me this 6th day of April, 2026.

Elaine Brown

Notary Public

ELAINE BROWN
NOTARY PUBLIC
HANCOCK COUNTY
MAINE
MY COMMISSION EXPIRES JUNE 15, 2028

Notary Registration Number: 36668

My Commission Expires: June 15, 2028

Exhibit I

AFFIDAVIT OF MICHAEL HEIN

I, Michael Hein, duly sworn under oath, do solemnly swear that:

1. I am over the age of 18 and am competent to testify. I have personal knowledge of the facts and information set forth in this declaration.
2. I reside at 6 Scott Avenue in Fairfield, in the State of Maine. I am registered to vote at this address.
3. On January 15, 2026, at around 7:50am, I arrived at the Augusta Bureau of Motor Vehicles located at 19 Anthony Avenue, Augusta, Maine 04330 (the "BMV") for a scheduled appointment to renew my license.
4. When I arrived, I witnessed an individual walking down the line of around thirty individuals who were waiting to enter the BMV, gathering signatures on behalf of the organization "Protect Girls' Sports In Maine" ("PGSM"), in support of the ballot initiative called "An Act to Designate School Sports Participation and Facilities by Sex," (the "*Petition*").
5. This individual (the "*PGSM Circulator*") asked me if I would like to sign the Petition. I politely declined. The PGSM Circulator then asked me if I would like to sign a petition supporting State Senator James Libby for Governor. I declined again. The PGSM Circulator moved on.
6. As I approached the door to the BMV at around 8:00am, I noticed the PGSM Circulator had left dozens of loose Petitions on a table next to the entrance of the building. Many of the Petition pages were partially full of signatures.
7. I then entered the BMV building to have my license renewed.
8. At around 8:30am, I exited the building and saw the PGSM Circulator continuing to engage with individuals as they tried to walk into the building.

9. The loose petitions were still on the table unattended, roughly fifty feet from where the PGSM Circulator was interacting with people in the line.
10. I walked up to the table containing the loose petitions and took photos.
11. I approached the PGSM Circulator and asked him who granted him permission to collect signatures outside of a government building. The PGSM Circulator implied that the BMV had given him permission.
12. As I walked away, I observed a woman who appeared to be a supervisor (the "*BMV Supervisor*") exit the BMV building. The BMV Supervisor approached the PGSM Circulator and informed him that he needed a permit in his name from the Capitol Police to collect signatures at this site, which the BMV Supervisor implied he did not have. The PGSM Circulator replied he had a permit in the name of his employer. The BMV Supervisor replied that this was not sufficient for the PGSM Circulator to collect signatures at this site.
13. I am attaching with this affidavit evidence in the form of six photos, which I personally took on January 15, 2026, supporting my statements herein. These photos depict the PGSM Circulator speaking with various individuals, and later, the table full of loose petitions left unattended.

[Signature Page to Follow.]

DATED this the 6th day of April, 2026.

Michael G. Hein

Signature of Affiant

STATE OF MAINE

CITY/COUNTY OF

Kennebec

) ss:

)

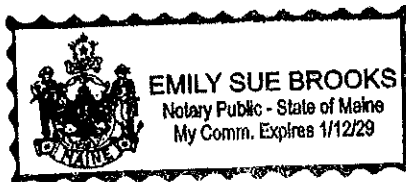
PERSONALLY APPEARED the above-named Michael G. Hein, this 6th day of April, 2026 and made oath that the foregoing is true and accurate based upon their own knowledge, information or belief, and so far as upon information or belief, they believe this information to be true.

ES Brooks

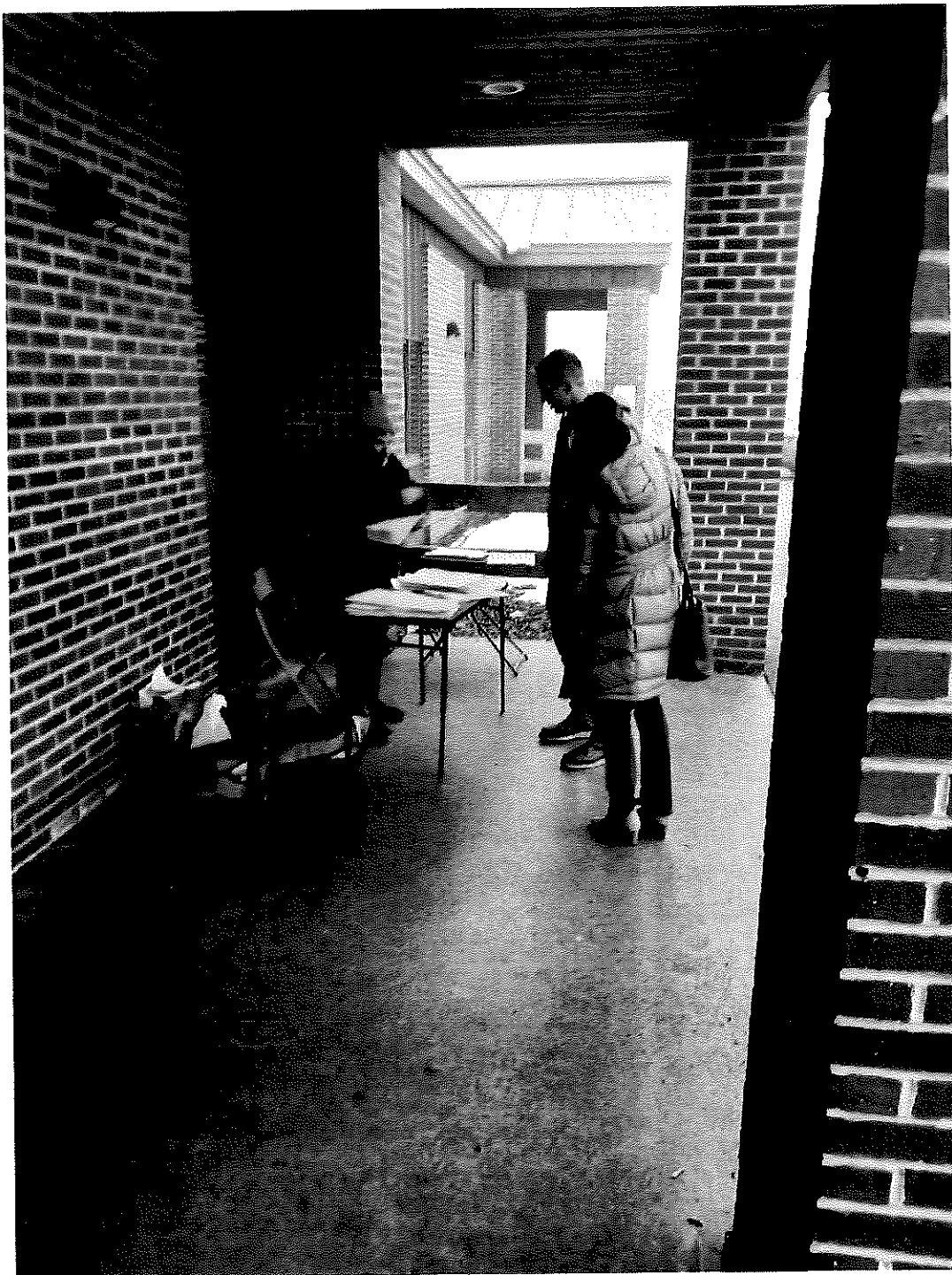
Notary Public

Notary Registration Number: _____

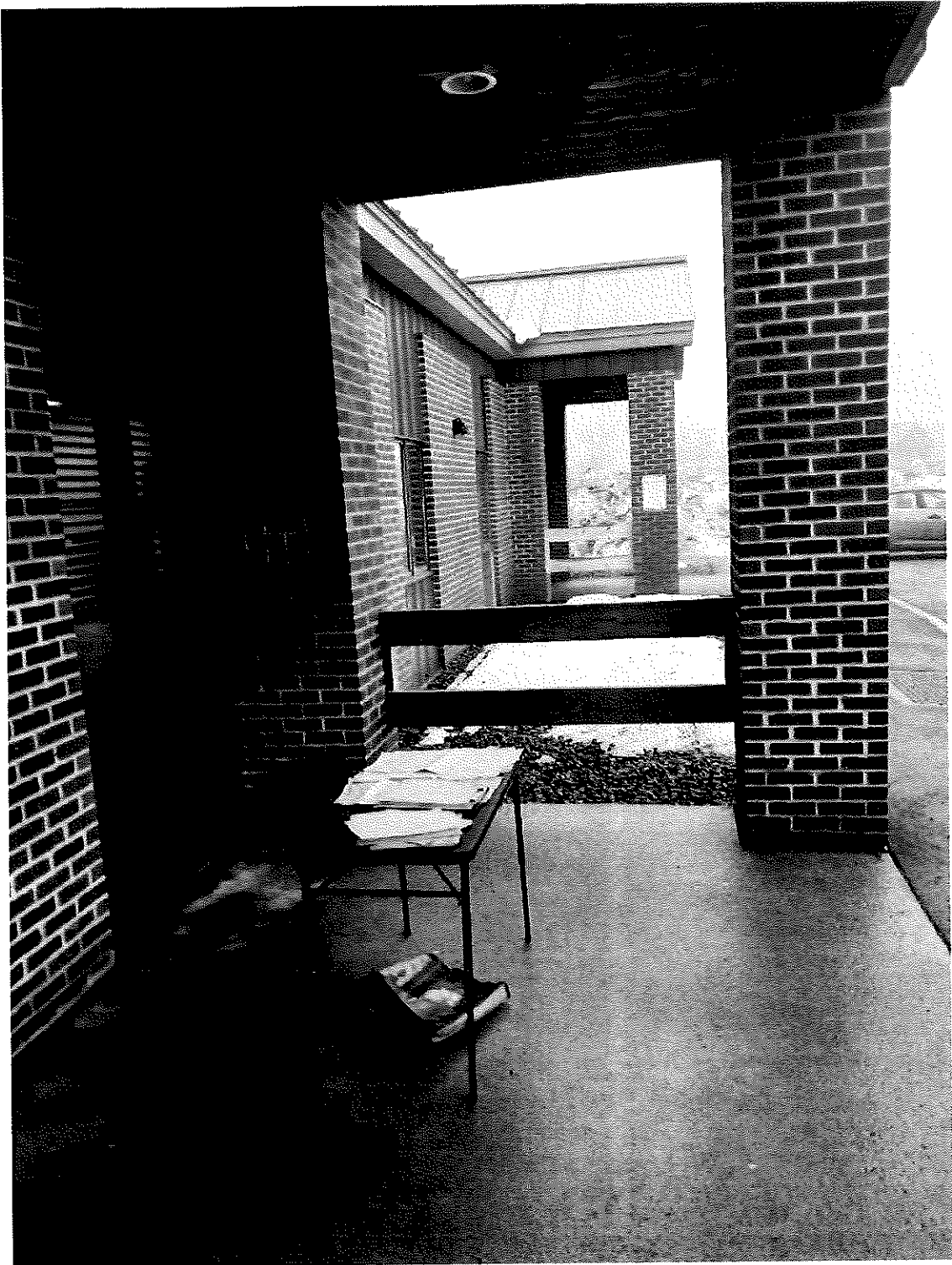
My Commission Expires: 1/12/2029



Attachment 1



Attachment 2



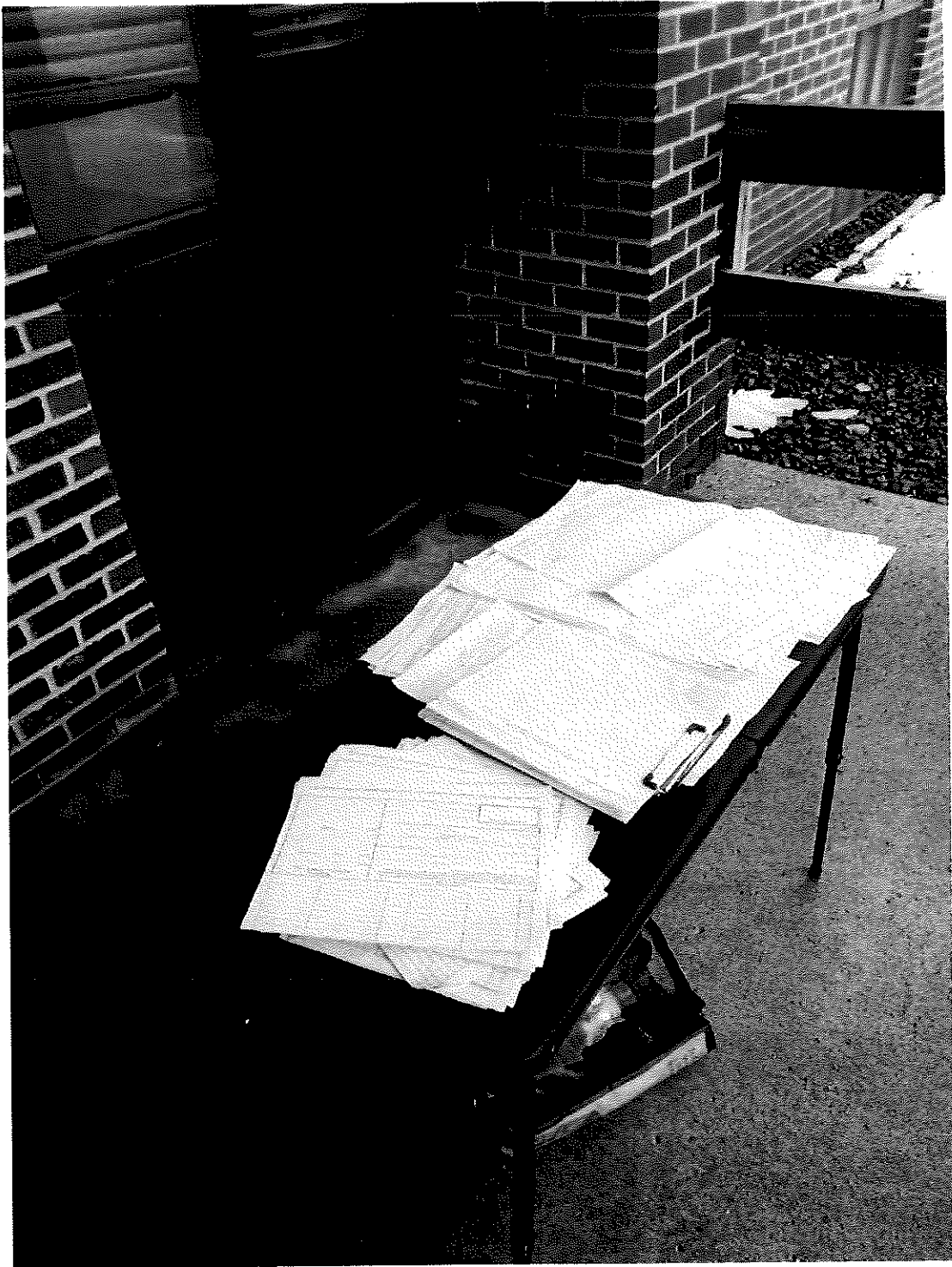
Attachment 3



Attachment 4



Attachment 5



Attachment 6

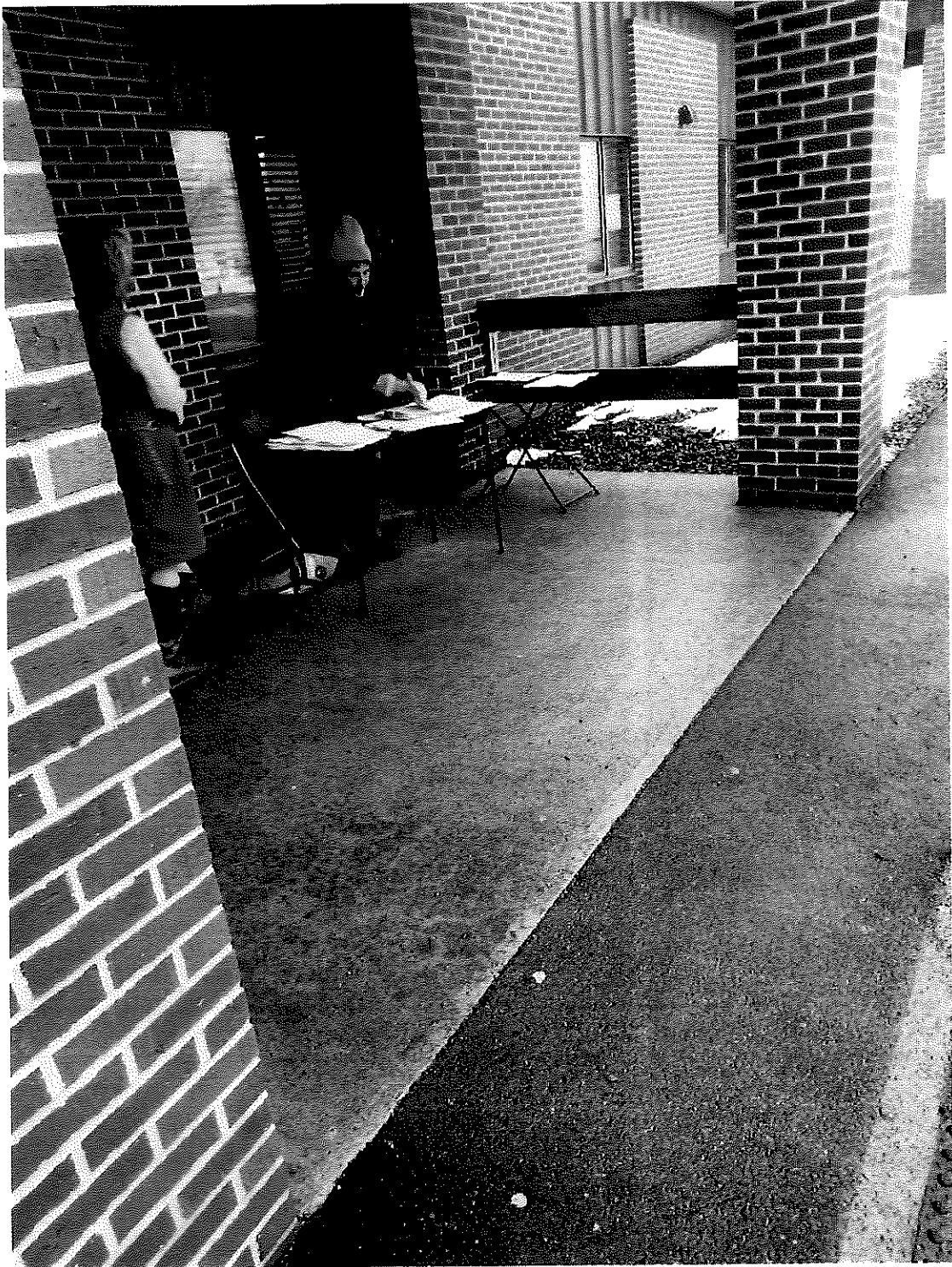


Exhibit J

AFFIDAVIT OF CYNTHIA GRIMM

I, Cynthia Grimm, duly sworn under oath, do solemnly swear that:

1. I am over the age of 18 and am competent to testify. I have personal knowledge of the facts and information set forth in this declaration.
2. I reside at 41 Elm St in Auburn, in the State of Maine. I am registered to vote at this address.
3. On December 7, 2025, at around 3:15pm, my family and I arrived at the town's annual Christmas Parade and Tree Lighting located at Festival Plaza along Main Street in Auburn, Maine.
4. Across Festival Plaza, there were several lines of people waiting for food, drinks, and for children to sit with Santa Claus.
5. Shortly after I arrived, I joined a line with my child to get hot cocoa.
6. At this time, I witnessed a gentleman approaching the individuals in front of me in line and handing them a clipboard with a stack of papers. I understood this man to be supporting the organization "Protect Girls' Sports in Maine" ("*PGSM*") by circulating petitions in support of the ballot initiative called "An Act to Designate School Sports Participation and Facilities by Sex," (the "*Petition*").
7. Immediately after this gentleman (the "*PGSM Circulator*") handed the Petition to these individuals, he walked away, while leaving the Petition with members of the public standing in line for food and drink.
8. The *PGSM Circulator* walked about fifteen feet away from the line and stood with his back to the line. The *PGSM Circulator* took out his phone and appeared to be photographing or recording something in the distance on his phone.
9. As the *PGSM Circulator* stood away from the line, I witnessed the individual in line holding the Petition sign the Petition and hand the Petition to a person beside them. That

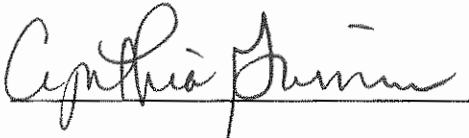
person signed and handed the Petition to a person beside them. The PGSM Circulator was not watching these individuals as they signed the Petition.

10. The PGSM Circulator then returned, handed the petition to a person behind me and walked away again, keeping his back turned for several minutes. The person behind me signed the petition, and then handed it to others to sign, and then it was handed to several more people, all while the PGSM Circulator's back was turned. This continued for several minutes. When the PGSM Circulator returned, he looked around for a moment to determine where the Petition had ended up. Upon finding it, he took the Petition back.
11. The PGSM Circulator then approached a different part of the line and handed the Petition to another individual. Once again, the PGSM Circulator walked about fifteen feet away and began looking at his phone, while individuals signed the Petition and handed it to the next person in line.
12. Over the course of the next hour and fifteen minutes, I witnessed the PGSM Circulator repeat this behavior with dozens more people. He routinely handed the Petition to one individual in line or in the crowd, walked away outside of the presence of these individuals, and did not watch as individuals signed the Petition and handed it to the next person.
13. During this time, I witnessed around 50 individuals sign the Petition outside the presence of the PGSM Circulator.
14. With this affidavit, I am attaching two photographs I took of the PGSM Circulator.
15. I left Festival Plaza at roughly 4:30pm.
16. The next day, on December 8, 2025, I emailed the Secretary of State about this incident to inform her that the PGSM Circulator had engaged in this behavior.
17. I have previously circulated petitions for other initiatives in the State of Maine. I know that under Maine law, the circulator of a petition must personally witness all signatures to any

petition that the circulator circulates. *See* Me. Rev. Stat. Ann. tit. 21-A, §§ 902, 903-A. The PGSM Circulator was not present when I saw an estimated 50 individuals sign the Petition, as described above.

[Signature Page to Follow.]

DATED this the 6th day of April, 2026.

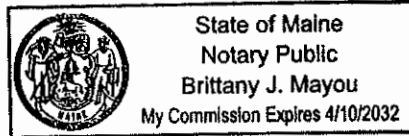


Signature of Affiant

STATE OF MAINE
COUNTY OF CUMBERLAND

PERSONALLY APPEARED the above-named Cynthia Grimm, this 6th day of April, 2026 and made oath that the foregoing is true and accurate based upon their own knowledge, information or belief, and so far as upon information or belief, they believe this information to be true.


Notary Public



Attachment 1



Attachment 2

