

2018-4

RECEIVED

JUL 01 2018

NEW HAMPSHIRE
DEPARTMENT OF STATE

Friday, June 29, 2018

The Honorable William M. Gardner
Secretary of State
State House
Concord, NH 03301

Dear Secretary Gardner:

I would like to challenge the eligibility of Mr. Dan Hynes as a candidate for State Senate District 9. I do not believe he is domiciled in the town of Bedford as he declared on his Declaration of Candidacy Form. I believe he is intending to domicile in Bedford, but when he filed his candidacy, was not in fact domiciled in Bedford. When Mr. Hynes registered to vote in Bedford he used 41 Palomino Lane as his address. Mr. Hynes is in the process of purchasing that property, but has not closed on it yet. As of June 26, The Keller Williams realtor for the seller indicated that the buyer (Mr. Hynes) was not currently renting the property. I would ask that he demonstrate that he in fact is domiciled in Bedford and eligible to run for State Senate District 9.

Sincerely,

Robert Heaps
66 Colonel Daniels Drive
Bedford NH 03110

NEW HAMPSHIRE BALLOT LAW COMMISSION

In re: BLC 2018-4 Challenge re. Dan Hynes candidacy for State Senate

AFFIDAVIT OF ROBERT HEAPS

I, Robert Heaps, under oath, depose and say as follows:

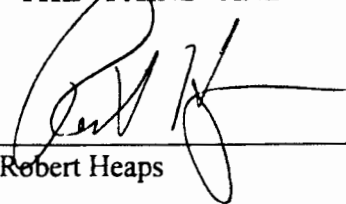
1. I have personal knowledge of the facts set forth herein, except facts stated to the best of my information and belief, which I believe are true.
2. I reside at 66 Colonel Daniels Drive, Bedford, NH 03110.
3. I am challenging the eligibility of Dan Hynes as a candidate for State Senate District 9, on the grounds that he was not a resident of that District when he filed his candidacy, and was not a resident of the Town of Bedford when he registered to vote in Bedford, using an address at which he did not then reside. A copy of my letter dated June 29, 2018, stating this challenge is annexed hereto as Exhibit A.
4. On June 26, 2018, real estate agent Ashley Rioux, who is a realtor for Keller Williams, informed an acquaintance of mine, William Greiner, that Mr. Hynes was scheduled to close on the property on July 6, 2018, and that the seller was still occupying the property at that time. Ms Rioux is the realtor who represents the seller of property located at 41 Palomino Lane in Bedford.
5. Annexed hereto as Exhibit B are copies of Bedford's voter registration list that show that Mr. Hynes registered as a Bedford voter with a purported Bedford address of 41 Palomino Lane sometime between May 22 and June 5.
6. Annexed hereto as Exhibit C is a copy of a mailer to voters in Bedford from Mr. Hynes that I obtained on June 29, 2018. The name of the addressee has been redacted on the envelope in which the mailer came; the envelope is reproduced as the last page of the Exhibit.

The envelope shows that Mr. Hynes' return address is 28 Maidstone Drive, Merrimack, NH 03054.

7. Annexed hereto as Exhibit D is a copy Facebook post by Mr. Hynes that I obtained from William Greiner on June 26. The Facebook post shows Mr Hynes claiming to be leasing the 41 Palomino Lane property.

8. On information and belief, Mr. Hynes has been residing in Merrimack, NH, and was not a resident of District 9, or an owner of property in that District, when he filed his candidacy.

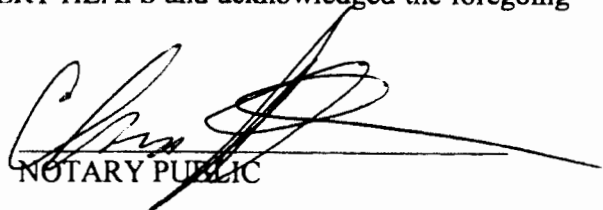
SIGNED AND SWORN TO UNDER THE PAINS AND PENALTIES OF PERJURY this 6th day of July, 2018.


Robert Heaps

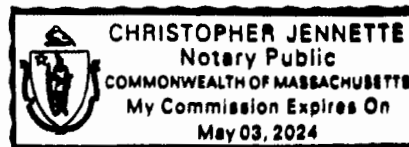
STATE OF Massachusetts

COUNTY OF Barnstable

There personally appeared the above-named ROBERT HEAPS and acknowledged the foregoing to be true to the best of his knowledge and belief.


NOTARY PUBLIC

My Commission Expires: 05/03/2024



Name	Voter ID	Address	Postal City	Postal Zip	Mailing Address	Party	Ward
HYDE, WINIFRED, B	02000457	120 MINISTERIAL RD	BEDFORD	03110		REP	00
HYMAN, BURTON, A	02000458	3 ASPEN LN	BEDFORD	03110		REP	00
HYMAN, MARINA, K	02000459	18 BUTTERFIELD LN	BEDFORD	03110		DEM	00
HYMAN, SUZANNE, A	02000460	3 ASPEN LN	BEDFORD	03110		REP	00
HYMAN, WILLIAM, E	02000461	18 BUTTERFIELD LN	BEDFORD	03110		REP	00
HYVONEN, EERO, JUHANI	013001560	15 METEA LN	BEDFORD	03110		REP	00
HYVONEN, MARY LOU	013001562	15 METEA LN	BEDFORD	03110		DEM	00
IANNITELLI, LINDA, L	020005483	57 GREY ROCK RD	BEDFORD	03110		UND	00
IANNONE, CARISSA, RAQUEL	300186862	26 SCOTT RD	BEDFORD	03110		DEM	00
IANNONE, JAMES, A	020006454	25 SCOTT RD	BEDFORD	03110		REP	00
IAROBINO, MICHAEL, V	020006466	48 MAGAZINE ST	BEDFORD	03110		DEM	00
IBANEZ, EDUARDO, LLADO	062005105	4 NEWFANE RD	BEDFORD	03110		REP	00
IBANEZ, MARCO, RIGGS	300446361	4 NEWFANE RD	BEDFORD	03110		REP	00
IBANEZ, SARAH, BETH	062005106	4 NEWFANE RD	BEDFORD	03110		REP	00
IBANEZ, ZACHARY, EDUARDO	300209332	4 NEWFANE RD	BEDFORD	03110		REP	00
IBARRA, DAVID, L	020006467	4 LIBERTY HILL RD	BEDFORD	03110		REP	00
ICKES, CYNTHIA, A	020006468	21 QUINCY DR	BEDFORD	03110		DEM	00
IKSTRIMS, JAVIS	020006473	9 REGENCY DR	BEDFORD	03110		REP	00
IKSTRIMS, TEIKA, V	020006474	9 REGENCY DR	BEDFORD	03110		REP	00
ILARIA, KATHERINE, LEE	300083214	58 POWDER HILL RD	BEDFORD	03110		REP	00
ILARIA, KRISTINA, MARIE	300243919	58 POWDER HILL RD	BEDFORD	03110		UND	00
ILARIA, MARK, J	020006475	58 POWDER HILL RD	BEDFORD	03110		REP	00
ILARIA, PATRICIA, A	020006476	58 POWDER HILL RD	BEDFORD	03110		REP	00
ILARIA, THOMAS, JAMES	300158077	58 POWDER HILL RD	BEDFORD	03110		UND	00
IMRIE, LUANN, C	020006481	3 PARK DR	BEDFORD	03110		REP	00
IMRIE, RONALD, N	020006482	3 PARK DR	BEDFORD	03110		REP	00
INAKOLLU, PRASANTHI, LAKSHMI	300504231	24 SUMMIT RD	BEDFORD	03110		UND	00
INGLIS SHATNEY, PAMELA, J	020006487	55 HOLBROOK HILL HD	BEDFORD	03110		UND	00
INGRAHAM KELLY, SUSAN	020006488	28 REGENCY DR	BEDFORD	03110		REP	00
INMAN, HOPE, W	020006490	59 EAGLE DR	BEDFORD	03110		DEM	00
INMAN CHARRON, JANE, MARIE	300044735	89 SANDY POND PKWY	BEDFORD	03110		DEM	00
INTEGLIA, DEBORAH, PERRY	300432560	7 NATHAN CUTLER DR	BEDFORD	03110		REP	00
INTEGLIA, MARK, JOHN	300252091	7 NATHAN CUTLER DR	BEDFORD	03110		UND	00
INTEGLIA, MOJCA, SONJA	300446392	7 NATHAN CUTLER DR	BEDFORD	03110		UND	00
INTINTOLI, JEANIE, M	020006493	61 FOREST DR	BEDFORD	03110		REP	00
INTINTOLI, JOANNA, LEIGH	300158093	61 FOREST DR	BEDFORD	03110		DEM	00
INTINTOLI, JOSEPHINE	020006494	7 ST ANDREWS DR	BEDFORD	03110		UND	00
INTINTOLI, PAT, M	020006495	61 FOREST DR	BEDFORD	03110		REP	00
IPPOLITO, JESSICA, LYNN	300329116	5 WAYSIDE DR	BEDFORD	03110		DEM	00
IPPOLITO, RANDALL, JAMES	069002571	5 WAYSIDE DR	BEDFORD	03110		REP	00

Voter Checklist – Bedford – May 22, 2018

Hynes not registered to vote in Bedford

Name	Voter ID	Address	Postal City	Postal Zip	Mailing Address	Party	Ward
HYMAN, BURTON, A	020006458	3 ASPEN LN	BEDFORD	03110		REP	00
HYMAN, MARINA, K	020006459	16 BUTTERFIELD LN	BEDFORD	03110		DEM	00
HYMAN, SUZANNE, A	020006460	3 ASPEN LN	BEDFORD	03110		REP	00
HYMAN, WILLIAM, E	020006481	16 BUTTERFIELD LN	BEDFORD	03110		REP	00
HYNES, DANIEL, PAUL	300029008	41 PALOMINO LN	BEDFORD	03110		REP	00
HYVONEN, EERO, JUHANI	013001580	15 METEA LN	BEDFORD	03110		REP	00
HYVONEN, MARY, LOU	013001582	15 METEA LN	BEDFORD	03110		DEM	00
IANNITELLI, LINDA, L	020006483	57 GREY ROCK RD	BEDFORD	03110		UND	00
IANNONE, CARISSA, RAQUEL	300186652	25 SCOTT RD	BEDFORD	03110		DEM	00
IANNONE, JAMES, A	020006484	25 SCOTT RD	BEDFORD	03110		REP	00
IARROBINO, MICHAEL, V	020006466	48 MAGAZINE ST	BEDFORD	03110		DEM	00
IBANEZ, EDUARDO, LLADO	092006105	4 NEWFANE RD	BEDFORD	03110		REP	00
IBANEZ, MARCO, RIGGS	300448381	4 NEWFANE RD	BEDFORD	03110		REP	00
IBANEZ, SARAH, BETH	082006106	4 NEWFANE RD	BEDFORD	03110		REP	00
IBANEZ, ZACHARY, EDUARDO	300206332	4 NEWFANE RD	BEDFORD	03110		REP	00
IBARRA, DAVID, L	020006487	4 LIBERTY HILL RD	BEDFORD	03110		REP	00
ICKES, CYNTHIA, A	020006486	21 QUINCY DR	BEDFORD	03110		UND	00
ICKES, JOHN, ALAN	020006489	21 QUINCY DR	BEDFORD	03110		UND	00
IKSTRUMS, JANIS	020006473	9 REGENCY DR	BEDFORD	03110		REP	00
IKSTRUMS, TEIKA, V	020006474	9 REGENCY DR	BEDFORD	03110		REP	00
ILARIA, KATHERINE, LEE	300080214	58 POWDER HILL RD	BEDFORD	03110		REP	00
ILARIA, KRISTINA, MARIE	300243619	58 POWDER HILL RD	BEDFORD	03110		UND	00
ILARIA, MARK, J	020006475	58 POWDER HILL RD	BEDFORD	03110		REP	00
ILARIA, PATRICIA, A	020006476	58 POWDER HILL RD	BEDFORD	03110		REP	00
ILARIA, THOMAS, JAMES	300158077	58 POWDER HILL RD	BEDFORD	03110		UND	00
IMRIE, LUANN, C	020006481	3 PARK DR	BEDFORD	03110		REP	00
IMRIE, RONALD, N	020006482	3 PARK DR	BEDFORD	03110		REP	00
INAKOLLU, PRASANTHI, LAKSHMI	300504231	24 SUMMIT RD	BEDFORD	03110		UND	00
INGLIS SHATNEY, PAMELA, J	020006487	55 HOLBROOK HILL RD	BEDFORD	03110		UND	00
INGRAHM KELLY, SUSAN	020006488	28 REGENCY DR	BEDFORD	03110		REP	00
INMAN, HOPE, W	020006480	50 EAGLE DR	BEDFORD	03110		DEM	00
INMAN CHARRON, JANE, MARIE	300044735	89 SANDY POND PKWY	BEDFORD	03110		DEM	00
INTEGLIA, DEBORAH, PERRY	300432660	7 NATHAN CUTLER DR	BEDFORD	03110		REP	00
INTEGLIA, MARK, JOHN	300252081	7 NATHAN CUTLER DR	BEDFORD	03110		UND	00
INTEGLIA, MOJCA, SONJA	300446382	7 NATHAN CUTLER DR	BEDFORD	03110		UND	00
INTINTOLI, JEANNE, M	020006493	61 FOREST DR	BEDFORD	03110		REP	00
INTINTOLI, JOHANNA, LEIGH	300158083	61 FOREST DR	BEDFORD	03110		DEM	00
INTINTOLI, JOSEPHINE	020006484	7 ST ANDREWS DR	BEDFORD	03110		UND	00
INTINTOLI, PAT, M	020006485	61 FOREST DR	BEDFORD	03110		REP	00
IPPOLITO, JESSICA, LYNN	300329118	8 WAYSIDE DR	BEDFORD	03110		DEM	00

Voter Checklist – Bedford – June 19, 2018

Hynes registered to vote between May 22 and June 5 using the address 41 Palomino Lane



BEDFORD, NH



Search

Street Listing

Sales Search

Feedback

Back

Home

41 PALOMINO LN

Q Sales

Print

Location 41 PALOMINO LN

Mblu 45/ 56/ //

Acct#

Owner JOYAL DONALD P JR

Assessment \$208,500

PID 6454

Building Count 1

topoTopography Level

Utility Public Water,Septic

Current Value

Valuation Year	Assessment			T
	Improvements	Land		
2017	\$113,500	\$95,000		

Owner of Record

Owner JOYAL DONALD P JR
 Address 41 PALOMINO LN
 BEDFORD, NH 03110

Sale Price \$168,900
 Certificate
 Book & Page 6617/ 434
 Sale Date 04/16/2002
 Instrument 00

Ownership History

Owner	Ownership History				T
	Sale Price	Certificate	Book & Page	Instrument	
JOYAL DONALD P JR	\$168,900		6617/ 434	00	0-
MERRILL FLORENCE R	\$0				

Building Information

Building 1 : Section 1

Year Built: 1954
 Living Area: 1,075
 Replacement Cost: \$169,701
 Building Percent Good: 66
 Replacement Cost
 Less Depreciation: \$112,000

Building Attributes

Field	Description
Style	Cape-Cott
Model	Residential
Grade	Average
Stories	1 Story
Occupancy	1
Exterior Wall 1	Vinyl Siding

Building Photo



Vision Government Solutions – June 19, 2018
 Assessor's database for the town of Bedford, NH
 Hynes is not listed as owner of 41 Palomino Lane



41 Palomino Lane, Bedford, NH 03110



[View All Photos](#)

\$229,900 **SALE PENDING**

For Sale Pending Single Family 3 Beds
1 Full Bath 1,075 Sq. Ft. 0.3 Acres
1 Car Garage



Save



Hide



Contact



Share

[Map & Location](#)



Real Estate Listing – June 18, 2018
41 Palomino Lane sale is still pending

Dan Hynes
28 Madstone Dr
Merrimack NH 03054



[REDACTED]
[REDACTED]
BEDFORD NH 03110-5917
[POSTNET BAR]

Mailer – June 29, 2018
Hynes mailer using his Merrimack address