

STATE OF NEW HAMPSHIRE

BALLOT LAW COMMISSION

Docket No. 2015-03

In re the Presidential Declaration of Candidacy of Senator Bernie Sanders

**Reply to Challenge to Senator Sanders as
a Qualified Candidate for the Democratic Presidential Nomination
and Motion to Dismiss for Lack of Standing and Lack of Jurisdiction**

Now comes Senator Bernie Sanders, through counsel, Andru Volinsky of the Bernstein Shur law firm, and states that he is a qualified candidate for the Democratic Presidential Nomination and deserves to be on the New Hampshire ballot. As well, the voters of New Hampshire deserve the right to vote for Senator Sanders. Points and authorities are incorporated herein.

Bernie Sanders is a Democrat and the Challenge Should Therefore Be Denied on its Merits

1. Senator Bernie Sanders is the long serving United States Senator for the state of Vermont. On April 30, 2015, Senator Sanders registered his candidacy for the federal office of president by filing with the Federal Election Commission ("FEC") his Statement of Candidacy, FEC Form 2, in which he identified his party affiliation as "Democratic Party." See attached FEC Form 2, Exhibit A.

2. Senator Sanders' party affiliation was also listed as Democrat in the FEC Statement of Organization, FEC Form 1, filed by the Senator's presidential campaign committee, Bernie 2016. See attached FEC Form 1 at 2, also part of Exhibit A. The FEC has recognized Senator Sanders as a Democratic candidate for the presidency as evidenced by its Details for Candidate reporting

contributions to Senator Sanders. See attached screenshot of FEC Details for Candidate, Exhibit A, also available at <http://fec.gov/fecviewer/CandidateCommitteeDetail.do>.

3. Senator Sanders has been universally recognized as a Democrat by the thousands of people who have heard him speak and by recognized media sources. *See e.g.*, “Bernie Sanders, Long-Serving Independent, Enters Presidential Race as a Democrat,” NY Times, available at http://www.nytimes.com/2015/04/30/us/politics/bernie-sanders-campaign-for-president.html?_r=0 (last viewed November 16, 2015), Exhibit B.

4. As evidenced by letters signed by the respective chairs of the New Hampshire and Vermont Democratic Parties, Senator Sanders has been accepted as a Democrat qualified to have his name placed on the ballot in contention for the 2016 Democratic presidential nomination. Vermont Democratic Party Letter, attached as Exhibit C; New Hampshire Democratic Party Letter, attached as Exhibit D.

5. The Democratic National Committee (“DNC”) recognizes Senator Sanders as a Democrat qualified to have his name placed on the ballot in contention for the 2016 Democratic Presidential Nomination. Please refer to announcement by DNC attached as Exhibit E. The DNC has permitted Senator Sanders to participate in the DNC sponsored debates among candidates for the Democratic nomination for president because it considers him a Democrat. The most recent DNC sponsored debate of the Democratic candidates was held on November 14, 2015. Finally, Senator Sanders is recognized by the DNC as a Democratic unpledged delegate, also commonly referred to as a super-delegate. See DNC list also attached as Exhibit E.

6. Senator Sanders has caucused with the Democratic Party since he first entered Congress in 1991. He has voted in every Vermont Democratic Party Presidential Primary since 2004. Senator Sanders was named in 2014 by Senate Democratic Leader Harry Reid as the

ranking member of the Senate Budget Committee. Also, when the Democrats were in the majority, Senate Democratic Leader Reid appointed Senator Sanders as Chairman of the Senate Committee for Veterans Affairs. This demonstrates that Senator Sanders is considered a Democrat by the leadership of the Democratic Party in Congress. Moreover, according to Congressional Quarterly's Party Unity Scores, between 2001 and 2008, when Senator Sanders and Secretary Clinton were both in the United States Senate, their voting records with respect to voting with the Democratic Leadership were virtually the same. Senator Sanders voted with leadership 97.25% of the time versus 96.25% for Secretary Clinton.¹

7. On November 5, 2015, Senator Sanders filed his declaration of candidacy to be placed on the Democratic Primary Ballot for New Hampshire's first in the nation primary to be held on February 9, 2016. Secretary of State William Gardner scrutinized and accepted the declaration of candidacy filed by Senator Sanders in which he declared himself a Democrat. At the time of his filing, Senator Sanders stated that he had to make a decision to run as a Democrat approximately six months earlier and decided, at that time, to become a Democrat. He further stated that he embraced the ideals of the Democratic Party and intended to support and improve upon those ideals. New Hampshire Democratic Party chair, Ray Buckley, accompanied Senator Sanders when he filed his declaration of candidacy.

8. Finally, Senator Sanders has stated his commitment to the Democratic Party and has been permitted to be listed on the ballots of a number of states in their state Democratic Primaries to date, including: Vermont, Arkansas, Alabama, Florida, Georgia, and Michigan. Senator Sanders has not been denied a position on a Democratic Presidential Primary Ballot anywhere in America.

¹ 2009 voting was excluded because Secretary Clinton did not serve a full year and abstained from her own confirmation vote.

The Challenge

9. On November 12, 2015, a challenge to the qualifications of Senator Sanders was filed by a Republican presidential candidate who currently goes by the name of Andy Martin. Mr. Martin purports to challenge Senator Sanders's credentials as a Democrat. Mr. Martin filed his own declaration of candidacy on November 10, 2015, listing a Manchester, New Hampshire post office box as his local campaign address. It is unclear if Mr. Martin is registered to vote in New Hampshire because he has been known by many names including Anthony Martin-Trigona and Andy Martin. The Sanders campaign acknowledges there is a registered Republican voter in Manchester's Ward 3 who is registered under the name of Anthony Robert Martin and who may be Andy Martin.

Senator Sanders Has Been Determined a Proper Candidate by Secretary of State Gardner and, by precedent, the Ballot Law Commission Must Accept Secretary Gardner's Determination

10. As stated above, Senator Sanders declared his candidacy on November 5, 2015 by appearing at the office of the Secretary of State and filing the declaration of candidacy required by R.S.A. 655:47. This statute prescribes the form that a candidate must complete to declare his or her candidacy. Secretary Gardner scrutinized and accepted the form. By letter dated November 6, 2015 over the signature of Karen Ladd, Assistant Secretary of State, Senator Sanders was advised that his name would appear as a "Democratic candidate for the Office of President of the United States" on the ballot as "Bernie Sanders" indicating his acceptance as a Democrat. Exhibit F.

11. The Ballot Law Commission has determined that it is empowered to hear and decide disputes "arising over whether nomination papers or declarations of candidacy filed with the Secretary of State conform with the law." *Complaint of Dr. Orly Taitz, Esq. against Barack Obama*, No. BLC-2011-04 at 1. In the *Taitz* matter, the complainant challenged the President's

place of birth as a means of disqualifying him from seeking re-election. The complaint also raised other challenges not cognizable under the United States Constitution. After hearing from the Complainant, the Ballot Law Commission ruled that it could have considered the complaint moot as the matter was not challenged when President Obama was first elected. However, the Ballot Law Commission did not do so. *Id.* at 2. Instead, the Ballot Law Commission made clear its express role when asked to decide a challenge to the placement of a candidate on the ballot. The Commission defined its role, thusly, “Absent an obvious defect in a filing for office (such as residency in a different district from that in which the candidate has filed, etc.), the Commission is limited to a review of the sufficiency of the filing of a candidate.” *Id.* at 3.

12. Based on its prior ruling in *Taitz*, it is clear that the question of whether or not Senator Bernie Sanders is sufficiently a Democrat is not properly before the Ballot Law Commission. Senator Sanders has stated under oath, in his declaration, that he is a Democrat. He has similarly averred to his status as a Democrat in his FEC filings. It is not the place or function of the Ballot Law Commission to determine the veracity of a candidate’s declarations. If voters are not sufficiently convinced that Senator Sanders supports the ideals of the Democratic Party, they may simply choose not to vote for him. However, as Secretary Gardner has already determined, Senator Sanders’s declaration of candidacy is in proper order and the Ballot Law Commission should not undermine the Secretary’s finding.

13. The regularity of the filing of the Declaration of Candidacy pursuant to R.S.A. 655:47 is committed solely and exclusively to the Secretary of State. R.S.A. 655:47, III provides: “The decision of the secretary of state as to the regularity of declarations of candidacy filed under this section shall be final.” This clear and affirmative statutory commitment of authority to the Secretary of State appears to be consistent with the *Taitz* ruling by the Ballot

Law Commission. Senator Sanders is not aware of any Ballot Law Commission opinion or order that purports to evaluate the commitment of a candidate to the ideals of a particular party and, where the party does not challenge Senator Sanders's *bona fides*, the state, through the Ballot Law Commission, should not either.

14. A number of states, including Vermont, do not permit a voter to declare a party affiliation. Renee Paradis, Brennan Center for Justice at NYU School of Law, "Party Affiliation in a System of Automatic Voter Registration" (2009) at Appendix B available at <http://www.brennancenter.org/sites/default/files/publications/VRM%20Party%20Affiliation.pdf> (last viewed November 18, 2015).² Although not registered in their home states as a member of a political party, President Obama, Vice President Gore, Governor Dean, and President George W. Bush were all permitted to have their names placed on their respective party's New Hampshire presidential primary ballots without challenge. Senator Sanders deserves no less treatment. A contrary determination would establish an unnecessarily rigid rule that would disenfranchise New Hampshire voters and prevent candidates from 20 states from qualifying to run for president. Unlike other portions of the New Hampshire election laws, where domicile and registration as a member of a recognized New Hampshire political party is a relevant prerequisite to voting in a primary election (see, e.g., R.S.A. 659:14), the registration requirement of a presidential candidate with an out-of-state residence must be reasonably read to mean a party affiliation, however that is declared. This appears, by longstanding precedent, to be just how the party affiliation requirement has been interpreted. Further, the required declaration does not include a minimum time period during which the presidential candidate is expected to

² The states that do not track party affiliation are: Alabama, Georgia, Hawaii, Idaho, Illinois, Indiana, Michigan, Minnesota, Mississippi, Missouri, Montana, North Dakota, Ohio, South Carolina, Tennessee, Texas, Vermont, Virginia, Washington, and Wisconsin. Statutory citations are available in the Brennan Center article.

have been a party member. Indeed, the relevant statute, R.S.A. 655:47, appears to allow the candidate to make the decision regarding party affiliation at the time of filing, much like the opportunity afforded an undeclared primary voter who declares her party affiliation for the purpose of voting in a particular party's primary. See R.S.A. 659:14.

15. Having declared himself a Democrat in both his state declaration of candidacy and in his federal declarations, Senator Sanders is a Democrat and it is not an appropriate function of the Ballot Law Commission to test the veracity of these declarations.

The Challenger Lacks Standing

16. Senator Sanders also challenges Mr. Martin's standing to file his complaint and bring this challenge. Mr. Martin is not a Democrat and may not be registered to vote in New Hampshire. He cannot show any particularized harm as, regardless of the party affiliation of Senator Sanders, the listing of Senator Sanders on the New Hampshire Democratic Presidential Primary Ballot will not deprive Mr. Martin of an opportunity to vote for a candidate of his choice in a party primary in the state where he is properly registered to vote. Mr. Martin's ability to run for President as a Republican is also unaffected.

17. In a similar matter litigated in federal court, a New Hampshire voter challenged the right of the Republican National Committee to nominate John McCain for president because Senator McCain was not born in the United States, but was born to parents who were United States Citizens stationed in Panama at the time of Senator McCain's birth. *Hollander v. McCain*, 566 F. Supp. 2d 63 (D.N.H. 2008). The Court (Laplante, J.) dismissed the complaint because Mr. Hollander lacked standing. *Id.* The Court defined standing as follows:

Article III of the Constitution limits the 'judicial power' of the United States to the resolution of 'cases' and 'controversies'.... As an incident to the elaboration of this bedrock requirement, [the Supreme] Court has always required that a litigant have 'standing' to challenge the action sought to be adjudicated in

the lawsuit.” *Valley Forge Christian Coll. v. Ams. United for Separation of Church & State, Inc.*, 454 U.S. 464, 471, 102 S.Ct. 752, 70 L.Ed.2d 700 (1982). So-called “Article III standing” has three requirements: (1) the plaintiff has suffered “an injury in fact,” (2) that injury bears a causal connection to the defendant’s challenged conduct, and (3) a favorable judicial decision will likely provide the plaintiff with redress from that injury. *Lujan v. Defenders of Wildlife*, 504 U.S. 555, 560–61, 112 S.Ct. 2130, 119 L.Ed.2d 351 (1992). The party bringing the claim—Hollander here—bears the burden to show his or her standing to bring it. *Elk Grove Unified Sch. Dist. v. Newdow*, 542 U.S. 1, 12, 124 S.Ct. 2301, 159 L.Ed.2d 98 (2004).

Hollander v. McCain, 566 F. Supp. 2d at 67.

18. Hollander, a Republican, was found to lack standing because he failed to show a particular injury or threatened injury, not one shared in common with the general public. 566 F. Supp. 2d at 68. Additionally, the candidacy of Senator McCain did not impact or injure Hollander’s right to vote for any other Republican in that year’s New Hampshire Republican Primary. *Id.*

19. In *Duncan v. State*, 166 N.H. 630, the New Hampshire Supreme Court made clear that its analysis of standing claims tracks its federal, Article III, analog.

[A]s a practical matter, Part II, Article 74 imposes standing requirements that are similar to those imposed by Article III of the Federal Constitution. *See Lujan v. Defenders of Wildlife*, 504 U.S. 555, 560–61, 112 S.Ct. 2130, 119 L.Ed.2d 351 (1992) (setting forth the elements of Article III standing). ..[S]tanding under the New Hampshire Constitution requires parties to have personal legal or equitable rights that are adverse to one another, *see Harvey*, 106 N.H. at 448, 213 A.2d 428, with regard to an actual, not hypothetical, dispute, *see *643 Kelly*, 159 N.H. at 394, 986 A.2d 575, which is capable of judicial redress, *see Faulkner*, 85 N.H. at 151, 155 A. 195; *State v. McPhail*, 116 N.H. 440, 442, 362 A.2d 199 (1976). *See Lujan*, 504 U.S. at 560–61, 112 S.Ct. 2130.

Duncan v. State, 166 N.H. 630, 642-43 (2014).

20. Mr. Martin fails to meet this standard because he has no legitimate connection to the New Hampshire Democratic Primary. First, it is not clear that Mr. Martin is registered to vote

in New Hampshire.³ If Mr. Martin is the person registered to vote in Manchester as Anthony Robert Martin, and his voter registration under this name is proper, he still lacks a connection to the Democratic Primary because he is registered as a Republican and the deadline by which voters may change their party affiliations to vote in the February 9th primary has passed.

21. Further, as Mr. Martin has declared his candidacy to run in the Republican Presidential Primary and *not* the Democratic Presidential Primary, he similarly lacks a proper connection to the Democratic Primary to justify this challenge and he therefore lacks standing to pursue the challenge.

22. Finally, nothing about the candidacy of Senator Bernie Sanders prevents Mr. Martin from voting for any other qualified candidate, including, presumably, himself. In short, Mr. Martin cannot show any particularized harm and, as a result, he lacks standing to bring this challenge.

23. As well, Mr. Martin is a serial *pro se* filer of frivolous and vexatious litigation. His conduct was summarized by the U.S. Court of Appeal for the 11th Circuit in 1993 in a case filed with his mother as follows:

Appellant's son, Anthony Martin-Trigona, is a notoriously vexatious and vindictive litigator who has long abused the American legal system...

As amazing as the volume of Anthony Martin-Trigona's litigiousness has been, where he has truly distinguished himself has been in "the style of litigation he has adopted and by the cunning and malignant sophistication he has brought to his avocation." 573 F.Supp. at 1247. Throughout his remarkably varied nationwide practice as a *pro se* litigator, Martin-Trigona has displayed an "ugly strand of personal animus and unjustifiable vituperation," *id.* at 1248, and he has used litigation as a cruel and effective weapon against his enemies, who are more often imagined than real. *Id.* at 1248-51 ("his choice of targets is not rational; rather, he is apt to fasten on anyone who has suffered the slightest contact with him.")...

[T]he Second Circuit said that:

³ In his FEC Statement of Candidacy filed on July 16, 2015, Mr. Martin lists his address, not the campaign address, as being in New York City. FEC Form 2, Exhibit G.

“Martin-Trigona is known to have filed over 250 civil actions, appeals, and other matters throughout the United States, which have been pursued with "persistence, viciousness, and general disregard for decency and logic." He has used legal pleadings to ventilate his contempt and hatred of persons of Jewish heritage and to level accusations which "have often been personal, have often emphasized racial or religious affiliations, and have often involved the members of ... judges' and counsel's families." The purpose, nature and effect of his resort to multiple litigation has been to involve as many persons in as many confounding legal processes as possible.”

Martin-Trigona v. Shaw, 986 F.2d 1384, 1385-86 (11th Cir. 1993).

24. The original federal injunction referenced above against Mr. Martin was largely upheld by the U.S. Court of Appeals for the 2nd Circuit in an opinion that summarized Mr. Martin’s conduct as follows:

To those who follow the business of the courts, the appellant needs no introduction. He is the source of literally hundreds of lawsuits, motions and miscellaneous pleadings, all but a small fraction of which lack any merit whatsoever. Viewing Martin-Trigona's litigious conduct in its entirety yields the inescapable conclusion that he persistently resorts to legal processes without regard to the merits of the claims asserted and that he invokes those processes largely to harass persons who have unluckily crossed his path. His abuse of legal processes is exemplified not only by the number and variety of meritless actions but also by his recent use of pleadings and other legal papers, the contents of which are set out in their appalling detail in the district court's opinion, as a vehicle to launch vicious attacks upon persons of Jewish heritage.

Martin-Trigona v. Lavien, 737 F.2d. 1254, 1256 (2nd Cir. 1984),), *on remand*, 592 F.Supp. 1566 (D.Conn.1984), *aff'd*, 763 F.2d 140 (1985), *cert. denied*, 474 U.S. 1061, 106 S.Ct. 807, 88 L.Ed.2d 782 (1986).

25. Mr. Martin has run for office on many occasions including seeking federal and state offices in Florida, Connecticut, Illinois, and New Hampshire. He has run for President as both a Democrat and a Republican on four occasions. https://en.wikipedia.org/wiki/Andy_Martin (last viewed on November 16, 2015).

The Ballot Law Commission Lacks Jurisdiction to Determine this Dispute

26. The Ballot Law Commission is not authorized to determine the extent of Senator Sanders's commitment to the Democratic Party. The Ballot Law Commission does not have rules or regulations that pertain to substance or procedure. The only statement of the jurisdiction of the Ballot Law Commission is contained in R.S.A. 665:6.

27. The Ballot Law Commission has a great deal of power with respect to the matters within its jurisdiction. It is determined to be the ultimate and final authority on facts and law within its jurisdiction. R.S.A. 665:6, III. The Ballot Law Commission, as a result, must be careful to limit its adjudications to matters for which it has jurisdiction.

28. The jurisdiction of the Ballot Law Commission is spelled out in R.S.A. 665:6. Section I of this statute provides for the Ballot Law Commission's oversight of primary recounts. Section II provides for the Ballot Law Commission's oversight of "nominations by papers" or "nominations to fill a vacancy." The former is outlined in R.S.A. 655:40-43 and relates to a petition process in which a candidate is *not* nominated through a primary. The latter concerns a political party's filling of a candidate vacancy whether by death, disqualification or because an office was not contested pursuant to R.S.A. 655:37-39. Neither jurisdictional paragraph gives the Ballot Law Commission any authority to consider the challenge by Mr. Martin that is currently before it. To the contrary, R.S.A. 655:47, III commits questions about the regularity of a presidential Declaration of Candidacy to the Secretary of State and not to the Ballot Law Commission.

Infringement on State and Federal Constitutional Rights

29. The Ballot Law Commission here is asked to determine the qualifications of a candidate for federal office by examining his credentials to be considered a member of a political

party with recognized and duly elected leadership. The conduct of the Ballot Law Commission, to the extent it is being asked to second guess the acceptance of Senator Sanders as a Democrat, violates his rights as protected by the First Amendment to the United States Constitution to freedom of speech and to associate with whoever he desires and violates the First Amendment rights of the Democratic Party to determine its membership.⁴

30. In *Eu v. San Francisco Cty. Democratic Cent. Comm.*, 489 U.S. 214 (1989), the Supreme Court considered the constitutionality of California laws that defined the rights and responsibilities of political parties with respect to organization and primary endorsements. The Court found the attempts at regulation unconstitutional, ruling:

Freedom of association means not only that an individual voter has the right to associate with the political party of her choice, *Tashjian, supra*, 479 U.S., at 214, 107 S.Ct., at 548 (quoting *Kusper, supra*, 414 U.S., at 57, 94 S.Ct., at 307), but also that a political party has a right to “identify the people who constitute the association,” *Tashjian, supra*, 479 U.S., at 214, 107 S.Ct., at 548 (quoting *Democratic Party **1021 of United States v. Wisconsin ex rel. La Follette*, 450 U.S. 107, 122, 101 S.Ct. 1010, 1019, 67 L.Ed.2d 82 (1981)); cf. *NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 460–462, 78 S.Ct. 1163, 1172, 2 L.Ed.2d 1488 (1958), and to select a “standard bearer who best represents the party’s ideologies and preferences.” *Ripon Society, Inc. v. National Republican Party*, 173 U.S.App.D.C. 350, 384, 525 F.2d 567, 601 (1975) (Tamm, J., concurring in result), cert. denied, 424 U.S. 933, 96 S.Ct. 1147, 47 L.Ed.2d 341 (1976).

489 U.S. at 224. The Court further noted that, “*Tashjian* recognizes precisely this distinction. In that case, we noted that a State may enact laws to ‘prevent the disruption of the political parties from without’ but not, as in this case, laws ‘to prevent the parties from taking internal steps affecting their own process for the selection of candidates.’ 479 U.S., at 224.” *Id.*, 489 U.S. at 227.

⁴ Senator Sanders recognizes that he does not represent the New Hampshire Democratic Party or the DNC.

31. The protections of Pt. 1, Art. 32 of the New Hampshire Constitution are the same as those protected by the First Amendment. *Opinion of the Justices*, 121 N.H. 434 (1984) and *Associated Press v. State*, 153 NH 120 (2005).

32. Pt. 1, Art. 32 protects the rights of individuals to associate with a political party and also protects the right of a political party to determine its membership. *Opinion of the Justices*, 158 N.H. 661, 667 (2009). The state may only interfere with associational rights concerning political parties in order to promote fair and honest elections and to avoid chaos. *Id. citing Burdick v. Takushi*, 504 U.S. 428, 433 (1992).

33. The conduct of the Ballot Law Commission in attempting to determine the *bona fides* of Senator Sanders to run as a Democrat, when he is recognized and endorsed as a member of the Democratic Party by that party's unchallenged leadership, is unfair and unconstitutional. Such an effort is not necessary to promote a fair and honest election or to avoid chaos. To the contrary, if the Ballot Law Commission sets itself up as the ultimate determiner of party *bona fides*, it usurps the right of parties to control their own affairs. This is particularly true here because this is not an instance in which there is a dispute between the candidate and a party. Senator Sanders and the New Hampshire Democratic Party are in complete agreement and both contend that he belongs on the ballot. To rule otherwise would be an affront to the honesty and integrity of the New Hampshire Democratic Party and Senator Sanders and would jeopardize the importance of our First-in-the-Nation Primary because the exclusion of Senator Sanders would undermine confidence in our system of election oversight.

34. Unlike other political offices that are also the subject of primary balloting in New Hampshire, qualifications to stand for the office of the President of the United States are defined

exclusively by the U.S. Constitution, and not by New Hampshire law. U.S. Constitution, Article II, Section 1, Clause 5.

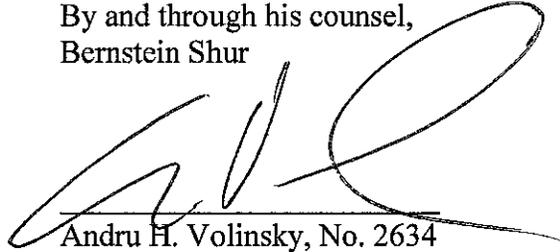
35. To impair the fundamental right to be placed on the New Hampshire ballot of a Presidential candidate who has unequivocally declared his party affiliation to federal and state election authorities, and who otherwise meets the qualifications for the office as prescribed by the U.S. Constitution, creates an unconstitutional distinction between citizens of states that have party-based voter registration (including New Hampshire) and the citizens of the 20 states that do not have party-based registration. This would violate the Equal Protection and Privileges and Immunities provisions of the U.S. Constitution (U.S. Constitution, Art. 4, § 2 & Amend. 14), and the counterpart provisions of the New Hampshire Constitution applicable to persons subject to New Hampshire law (not just citizens of the state). (N.H. Constitution, Part 1, Arts. 1, 2, & 14. *See Chimento v. Stark*, 353 F.Supp. 1211, 1214 (D. N.H.) *aff'd*, 414 U.S. 802 (1973) (limitations placed by a state on the right to run for public office implicates interests of constitutional magnitude; “[w]here, as here, the law in question poses a barrier to a candidacy of a not insubstantial segment of the community,” strict scrutiny standard of review applies).

Conclusion

WHEREFORE, FOR THE FOREGOING REASONS, Senator Bernie Sanders requests the Ballot Law Commission deny the challenge filed by Mr. Martin and for such other relief as is just and proper.

Respectfully submitted,

Senator Bernie Sanders
By and through his counsel,
Bernstein Shur

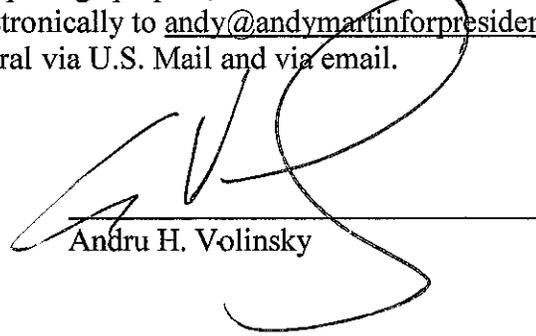


Andru H. Volinsky, No. 2634
PO Box 1120
Manchester, NH 03105
avolinsky@bernsteinshur.com
603.623.8700

Certification

I hereby certify that a true and exact copy of the foregoing has been provided to Mr. Andy Martin by placing same in the U.S. Mail, postage prepaid, addressed to PO Box 742, Manchester, NH 03105 and, at his request, electronically to andy@andymartinforpresident.com, and to James Boffetti, Assistant Attorney General via U.S. Mail and via email.

November 20, 2015



Andru H. Volinsky

STATE OF NEW HAMPSHIRE

BALLOT LAW COMMISSION

Docket No. 2015-03

In re the Presidential Declaration of Candidacy of Senator Bernie Sanders

**Reply to Challenge to Senator Sanders as
a Qualified Candidate for the Democratic Presidential Nomination
and Motion to Dismiss for Lack of Standing and Lack of Jurisdiction**

Exhibit A

Hand Delivered

100% HAND DELIVERED

Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
 The FEC added this page to the end of this filing to indicate how it was received.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt <i>4/30/15</i>
<input type="checkbox"/> USPS First Class Mail	Postmarked Date of Receipt
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
<input type="checkbox"/> USPS Priority Mail Express	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
	Next Business Day Delivery <input type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
<i>JB</i> PREPARER (3/2015)	<i>4/30/15</i> DATE PREPARED

FORM 1101-1 (3/2015)

5. TYPE OF COMMITTEE

Candidate Committee:

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate Bernard Sanders

Candidate Party Affiliation DEM Office Sought: House Senate President State District

- (c) This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate _____

Party Committee:

- (d) This committee is a (National, State or subordinate) committee of the (Democratic, Republican, etc.) Party.

Political Action Committee (PAC):

- (e) This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:
 - Corporation Corporation w/o Capital Stock Labor Organization
 - Membership Organization Trade Association Cooperative
 - In addition, this committee is a Lobbyist/Registrant PAC.
- (f) This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)
 - In addition, this committee is a Lobbyist/Registrant PAC.
 - In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representative:

- (g) This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1.	_____	FEC ID number	<input type="checkbox"/> _____
2.	_____	FEC ID number	<input type="checkbox"/> _____
3.	_____	FEC ID number	<input type="checkbox"/> _____
4.	_____	FEC ID number	<input type="checkbox"/> _____

COMMITTEE - DEM - NIDONT



Write or Type Committee Name

Bernie 2016

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

NONE

Mailing Address

CITY

STATE

ZIP CODE

Relationship: Connected Organization Affiliated Committee Joint Fundraising Representative Leadership PAC Sponsor

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name Erinn Larkin

Mailing Address PO Box 905

Burlington VT 05402

CITY STATE ZIP CODE

Title or Position

Treasurer Telephone number

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name of Treasurer Erinn Larkin

Mailing Address PO Box 905

Burlington VT 05402

CITY STATE ZIP CODE

Title or Position Treasurer Telephone number

CONFIDENTIAL

Hand Delivered

1-800-441-1111

Details for Committee ID : C00577130

[About This Site](#)
[Two Year Summary](#)
[Office Reports](#)
[Quick Answers](#)
[Files](#)
[Contact Us](#)
[Site Map](#)

Two-Year Period **2016** ▼

[New Search](#)

Export Options:

[Metadata](#)
[XML](#)
[CSV](#)
[JSON](#)

2016 COMMITTEE INFORMATION

C00577130

CANDIDATE INFORMATION

SANDERS, BERNARD

ID:

P60007168

Name: BERNIE 2016

Address: PO BOX 905, BURLINGTON, VT 05402

Office: P - Presidential

Treasurer Name: JACKSON, SUSAN

State: US, **District:** 00

Type: P - PRESIDENTIAL

Designation: P - PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE

Party: DEMOCRATIC PARTY

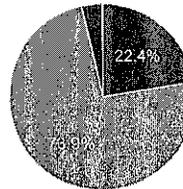
FINANCIAL SUMMARY - BERNIE 2016

From: 04/01/2015 **To:** 09/30/2015 ?

I. RECEIPTS

Federal Funds	\$0
<u>Itemized Individual Contributions</u>	\$9,300,567
Unitemized Individual Contributions	\$30,652,976
Total Individual Contributions	\$39,953,543
Party Committees Contributions	\$0
<u>Other Committees Contributions</u>	\$200
Candidate Contributions	\$0
TOTAL CONTRIBUTIONS	\$39,953,743
<u>Transfers from Authorized Committees</u>	\$1,500,000
Candidate Loans	\$0
Other Loans	\$0
TOTAL LOANS	\$0
<u>Offsets to Operating Expenditures</u>	\$2,054
Fundraising Offsets	\$0
Legal and Accounting Offsets	\$0
TOTAL OFFSETS	\$2,054
<u>Other Receipts</u>	\$7,985
TOTAL RECEIPTS	\$41,463,783

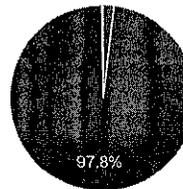
Receipts



- Itemized Individual Contributions
- Unitemized Individual Contributions
- Transfers from Authorized Committees
- Other

II. DISBURSEMENTS	
<u>Operating Expenditures</u>	\$14,022,254
Transfers To Authorized Committees	\$0
Fundraising	\$0
Exempt Legal and Accounting	\$0
Candidate Loan Repayments	\$0
Other Loan Repayments	\$0
TOTAL LOAN REPAYMENTS	\$0
<u>Individual Refunds</u>	\$281,777
Political Party Refunds	\$0
Other Committee Refunds	\$0

Disbursements



- Individual Refunds
- Operating Expenditures
- Other Disbursements



TOTAL CONTRIBUTION REFUNDS	\$281,777
<u>Other Disbursements</u>	\$40,030
TOTAL DISBURSEMENTS	\$14,344,062

III. CASH SUMMARY

Beginning Cash On Hand	\$0
Ending Cash On Hand	\$27,119,721
Net Contributions	\$39,671,966
Net Operating Expenditures	\$14,020,200
Debts/Loans Owed By	\$0
Debts/Loans Owed To	\$0

B

STATE OF NEW HAMPSHIRE

BALLOT LAW COMMISSION

Docket No. 2015-03

In re the Presidential Declaration of Candidacy of Senator Bernie Sanders

**Reply to Challenge to Senator Sanders as
a Qualified Candidate for the Democratic Presidential Nomination
and Motion to Dismiss for Lack of Standing and Lack of Jurisdiction**

Exhibit B

POLITICS

Bernie Sanders, Long-Serving Independent, Enters Presidential Race as a Democrat

By ALAN RAPPEPORT APRIL 29, 2015

Senator Bernie Sanders, the Vermont independent, announced Thursday that he was running for president as a Democrat, injecting a progressive voice into the contest and providing Hillary Rodham Clinton with her first official rival for the party's nomination.

Avoiding the fanfare that several Republicans have chosen so far when announcing their candidacies, Mr. Sanders issued a statement to supporters that laid out his goals for reducing income inequality, addressing climate change and scaling back the influence of money in politics.

"After a year of travel, discussion and dialogue, I have decided to be a candidate for the Democratic nomination for president," Mr. Sanders said in an email early Thursday.

Mr. Sanders's bid is considered a long shot, but his unflinching commitment to stances popular with the left — such as opposing foreign military interventions and reining in big banks — could force Mrs. Clinton to address these issues more deeply.

On a patch of grass known as the Swamp outside the Capitol, Mr. Sanders later articulated before a horde of journalists and a few curious onlookers why he was running. He acknowledged that he faced big financial challenges but said that, as a

politician with the “most unusual political history of anyone in Congress,” he was optimistic about his chances.

“We’re in this race to win,” he said.

Mr. Sanders plans to hold a formal campaign kickoff on May 26 in Burlington, Vt., where he was once mayor, but he will hit the campaign trail this weekend, holding an event in Manchester, N.H., where the nation’s first primary is being held in February. And he is expected to make accessibility a hallmark of his campaign.

“This is not going to be, ‘I’ll give you two questions and see you later,’ ” an adviser said, in an apparent reference to Mrs. Clinton’s campaign style.

Mr. Sanders, 73, has said that he will not run a negative campaign and that he has never run an attack ad in his life. A self-described “Democratic socialist” and grumpy grandfather-type, Mr. Sanders has promised to steer the Democratic Party toward a mature debate about the issues he is passionate about.

While traveling the country considering a run, Mr. Sanders has acknowledged that going up against Mrs. Clinton will be a daunting financial challenge. He has \$4.6 million available for his 2018 Senate re-election campaign that he can use for a presidential run, and Mr. Sanders said he hoped to galvanize a movement of small donors to give himself a fighting chance.

“We’re not going to raise \$2 billion, and we’re not going to raise \$1 billion,” said Mr. Sanders, who added that he did not intend to use the help of a “super PAC.” “I do not have millionaire or billionaire friends.”

In a speech at the National Press Club in Washington on March 9, Mr. Sanders said he fantasized about getting 3 million supporters to each donate \$100 to his campaign. The total, he joked, would be about a third of what the billionaire Koch brothers planned to spend to elect a Republican president.

Born in Brooklyn, Mr. Sanders served for 16 years as Vermont’s sole congressman before he was elected to the Senate in 2006. He often brags about being the longest-serving independent in congressional history, but he plans to run

for president as a Democrat to avoid the obstacles of getting on state ballots and participating in debates.

Democrats who have been hoping for more liberal candidates to enter the race, such as Senator Elizabeth Warren of Massachusetts or former Gov. Martin O'Malley of Maryland, cheered Mr. Sanders's decision.

"Having Bernie Sanders in the race, calling for populism, will help open the political space for people like Hillary Clinton and others to take bold stands," said Adam Green, a co-founder of the Progressive Change Campaign Committee.

If anything, Mr. Sanders, who embraces his reputation for being gruff, abrupt and honest, promises to be bold. Recalling that he has defeated Democrats and Republicans with far greater financial resources in his long career, Mr. Sanders suggested that his campaign should not be taken lightly.

"I think people should be a little bit careful underestimating me," he said.

Follow The New York Times Politics and Washington on Facebook and Twitter, and sign up for the First Draft politics newsletter.

A version of this article appears in print on May 1, 2015, on page A21 of the New York edition with the headline: Sanders, Long-Serving Independent, Enters Presidential Race as a Democrat.

© 2015 The New York Times Company

:cal SetSyn("html")

C

STATE OF NEW HAMPSHIRE

BALLOT LAW COMMISSION

Docket No. 2015-03

In re the Presidential Declaration of Candidacy of Senator Bernie Sanders

**Reply to Challenge to Senator Sanders as
a Qualified Candidate for the Democratic Presidential Nomination
and Motion to Dismiss for Lack of Standing and Lack of Jurisdiction**

Exhibit C



THE VERMONT DEMOCRATIC PARTY
PO BOX 1220 - MONTPELIER, VERMONT 05601
802.229.1783 vtdemocrats.org

Dear Secretary Gardner,

The Vermont State Democratic Committee operates the Vermont Democratic Party, according to its bylaws. The purpose of the State Committee is to promote the interests, ideals, and principles of Vermont Democrats, operate the Vermont Democratic Party ("Party") pursuant to 17 VSA §2310, support the election of Democratic candidates, ensure the adoption of a party platform, represent Vermont Democrats on the Democratic National Committee, and coordinate, encourage, and assist in the organization of Democratic town and county committees. Any person who is a Vermont registered voter and who supports the purposes of the Vermont State Democratic Committee may participate fully in all Party activities and is eligible to be elected to any Party office as a Democrat.

The Vermont Democratic Party knows that Senator Bernie Sanders is a Vermont registered voter and considers Senator Sanders to be a member of the Vermont Democratic Party and supports the placement of his name into nomination as a Democratic candidate for president in the 2016 New Hampshire Primary.

Senator Sanders has been nominated as a Democrat by the Vermont State Democratic Committee for elected offices as a member of the U.S. House of Representatives and for the U.S. Senate. While this letter should not be construed as an endorsement of Senator Sanders in the Presidential Primary, we without question believe he supports the interests, ideals, principles, and purposes of Vermont Democrats and, for these reasons, the Vermont Democratic Party supports his inclusion on the ballot as a Democrat.

Please do not hesitate to contact me should you have any questions – (802) 229-1783 or ddeans@vtdemocrats.org.

Sincerely,

Dottie Deans
Chair, Vermont Democratic Party

cc: Julia Barnes, Sanders for President, New Hampshire State Director

Paid for by the Vermont Democratic Party | www.vtdemocrats.org
Not authorized by any candidate or candidate's committee.

D

STATE OF NEW HAMPSHIRE

BALLOT LAW COMMISSION

Docket No. 2015-03

In re the Presidential Declaration of Candidacy of Senator Bernie Sanders

**Reply to Challenge to Senator Sanders as
a Qualified Candidate for the Democratic Presidential Nomination
and Motion to Dismiss for Lack of Standing and Lack of Jurisdiction**

Exhibit D



NEW HAMPSHIRE DEMOCRATIC PARTY

105 North State Street • Concord, NH 03301
Phone: 603-225-6899 • Fax: 603.225.6797
www.nhdp.org
Raymond Buckley, Chair

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

October 7, 2015

Dear Secretary Gardner;

The New Hampshire Democratic Party is a duly recognized political party pursuant to R.S.A. 652:11. The New Hampshire Democratic Party is dedicated to justice, equality, and freedom, the principles that form the bedrock of our great Nation. The New Hampshire Democratic Party fosters accountable leadership that moves in concert with the needs of its members. Further, the New Hampshire Democratic Party embraces a diversity of political philosophies and conducts itself according to the wishes of the majority of its membership. The major priorities of the New Hampshire Democratic Party are to elect Democrats to public offices, to enlarge its membership, and to function in an open and democratic manner, consistent with its Constitution and the laws of the United States and the State of New Hampshire. The ultimate goal of the New Hampshire Democratic Party is to aid our government to perform effectively as a true democracy, representative of all the people.

The New Hampshire Democratic Party considers Senator Bernie Sanders to be a member of the Democratic Party and supports the placement of his name into nomination as a Democratic candidate for president in the 2016 New Hampshire Primary.

Senator Sanders has been nominated in his home state of Vermont as a Democrat for elected offices as a member of the U.S. House of Representatives and for the U.S. Senate. Senator Sanders is currently nominated as a Democratic candidate for president of the United States in Vermont and will appear on the Vermont ballot as a Democrat in the 2016 primary. Senator Sanders supports the ideals of the New Hampshire Democratic Party. Finally, Senator Sanders was invited to speak at the state convention of the New Hampshire Democratic Party as a Democratic candidate for president. The state convention was held on September 19, 2015 in Manchester, New Hampshire and was attended by the state party's leadership and over 4,200 attendees. Senator Sanders candidacy was well received by those in attendance at the convention.

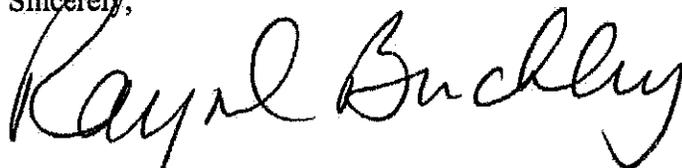
The Democratic National Committee considers Senator Bernie Sanders to be a member of the Democratic Party. Senator Sanders was included as a speaker at the most recent meeting of the Democratic National Committee in Minneapolis, Minnesota and will be appearing at multiple other Democratic National Committee sponsored events including the six debates of the Democratic presidential candidates. Senator Sanders has been

included in all events and forums hosted by our early state siblings. Iowa, Nevada and South Carolina all consider Senator Sanders a Democratic candidate for president.

For these reasons, the New Hampshire Democratic Party supports his inclusion on the New Hampshire ballot as a Democrat.

Please feel free to reach out to me with any questions – (603) 225-6899 or chairman@nhdp.org.

Sincerely,

A handwritten signature in black ink that reads "Raymond Buckley". The signature is written in a cursive, flowing style.

Raymond Buckley
State Chair
New Hampshire Democratic Party

Vice Chair
Democratic National Committee

E

STATE OF NEW HAMPSHIRE

BALLOT LAW COMMISSION

Docket No. 2015-03

In re the Presidential Declaration of Candidacy of Senator Bernie Sanders

**Reply to Challenge to Senator Sanders as
a Qualified Candidate for the Democratic Presidential Nomination
and Motion to Dismiss for Lack of Standing and Lack of Jurisdiction**

Exhibit E

DNC CHAIR STATEMENT ON BERNIE SANDERS' 2016 ANNOUNCEMENT

(//WWW.DEMOCRATS.ORG/POST/DNC-CHAIR-STATEMENT-ON-BERNIE-SANDERS-2016-ANNOUNCEMENT)

APRIL 30, 2015 (//WWW.DEMOCRATS.ORG/POST/DNC-CHAIR-STATEMENT-ON-BERNIE-SANDERS-2016-ANNOUNCEMENT)

Washington, DC – In response to Bernie Sanders' announcement that he will run for president in 2016, DNC Chair Rep. Debbie Wasserman Schultz released the following statement:

“Democrats welcome Vermont Senator Bernie Sanders as the second candidate to officially seek the Democratic Party's nomination for President in 2016. Senator Sanders is well-recognized for his principled leadership and has consistently stood up for middle class families. Throughout his service in the U.S. House and Senate, Bernie Sanders has clearly demonstrated his commitment to the values we all share as members of the Democratic Party.

“The Democratic Party appreciates the contributions that Senator Sanders, Secretary Clinton, and other candidates will make to a healthy dialogue about the future of our party and our nation. There is a distinct contrast between Democrats who are on the side of middle and working class families and Republicans who are concerned with the very rich and wealthy corporations. Over the next year, the discussions we have during our respective nominating processes will help make that choice clear.”

Unpledged Delegates -- By State

Refer to Page 22

ALABAMA

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Randy Kelley	1	ALABAMA DNC MEMBER
Unzell Kelley	1	NATL. DEM. COUNTY OFFICIALS
Janet May	1	ALABAMA DNC MEMBER
Redding Pitt	1	ALABAMA DNC MEMBER
Darryl R. Sinkfield	1	ALABAMA DNC MEMBER
Nancy Worley	1	ALABAMA DNC MEMBER
<i>US Representative</i>		
Terri Sewell	1	

State's Total Unpledged Delegate Votes: 7 State's Total Unpledged Delegates: 7

ALASKA

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Kimberly Metcalfe	1	ALASKA DNC MEMBER
Ian N. Olson	1	ALASKA DNC MEMBER
Casey Steinau	1	ALASKA DNC MEMBER
Mike Wenstrup	1	ALASKA DNC MEMBER

State's Total Unpledged Delegate Votes: 4 State's Total Unpledged Delegates: 4

AMERICAN SAMOA

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
M. Tuufuli Galeai	1	AMERICAN SAMOA DNC MEMBER
Therese L. Hunkin	1	AMERICAN SAMOA DNC MEMBER
Fagafaga D. Langkilde	1	AMERICAN SAMOA DNC MEMBER
Clara Reid	1	AMERICAN SAMOA DNC MEMBER

State's Total Unpledged Delegate Votes: 4 State's Total Unpledged Delegates: 4

ARIZONA

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Kate Gallego	1	ARIZONA DNC MEMBER
Luis Heredia	1	ARIZONA DNC MEMBER
Danica Oparnica	1	NATL. DEM. ETHNIC COORD. COUNCIL
William G. Roe	1	ARIZONA DNC MEMBER
Alexis Tameron	1	ARIZONA DNC MEMBER
Carolyn Warner	1	ARIZONA DNC MEMBER
<i>US Representative</i>		
Ruben Gallego	1	
Raúl Grijalva	1	
Ann Kirkpatrick	1	
Kyrsten Sinema	1	

State's Total Unpledged Delegate Votes: 10 State's Total Unpledged Delegates: 10

Unpledged Delegates -- By State**ARKANSAS**

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Joyce Elliot	1	ARKANSAS DNC MEMBER
Vincent Incalaco	1	ARKANSAS DNC MEMBER
Dustin McDaniel	1	ARKANSAS DNC MEMBER
Lottie Shackelford	1	MEMBERS-AT-LARGE
Krystal Thrailkill	1	ARKANSAS DNC MEMBER

State's Total Unpledged Delegate Votes: 5 State's Total Unpledged Delegates: 5

CALIFORNIA

<i>DNC Member</i>		<i>DNC Affiliation Type</i>	
Steven K. Alari	1	CALIFORNIA DNC MEMBER	
Shawn Bagley	1	CALIFORNIA DNC MEMBER	
Rachel Binah	1	CALIFORNIA DNC MEMBER	
John Burton	1	CALIFORNIA DNC MEMBER	
Joe Buscaino	1	NATL. DEM. MUNICIPAL OFFICIALS	
Becca Doten	1	CALIFORNIA DNC MEMBER	
Maria Elena Durazo	1	OFFICERS	
Jess Durfee	1	CALIFORNIA DNC MEMBER	
Mary Ellen Early	1	CALIFORNIA DNC MEMBER	
Maria Echaveste	1	MEMBERS-AT-LARGE	
Alexandra Gallardo Rooker	1	CALIFORNIA DNC MEMBER	
Tefere Gebre	1	MEMBERS-AT-LARGE	
Pat Hobbs	1	NATL. FED. OF DEM. WOMEN	
Alice A. Huffman	1	CALIFORNIA DNC MEMBER	
Aleita J. Huguenin	1	CALIFORNIA DNC MEMBER	
Matt Johnson	1	MEMBERS-AT-LARGE	
Andrew Lachman	1	CALIFORNIA DNC MEMBER	
Barbara Lee	1	CALIFORNIA DNC MEMBER	(DNC Vote Only)
Evan Low	1	MEMBERS-AT-LARGE	
Kerman Maddox	1	MEMBERS-AT-LARGE	
Mattie McFadden Lawson	1	MEMBERS-AT-LARGE	
Bob Mulholland	1	CALIFORNIA DNC MEMBER	
Christine Pelosi	1	CALIFORNIA DNC MEMBER	
Nancy Pelosi	1	CONGRESSIONAL REPRESENTATIVES	(DNC Vote Only)
John A. Perez	1	CALIFORNIA DNC MEMBER	
Garry S. Shay	1	CALIFORNIA DNC MEMBER	
Hilda Solis	1	MEMBERS-AT-LARGE	
Christopher Stampolis	1	CALIFORNIA DNC MEMBER	
Keith Umemoto	1	CALIFORNIA DNC MEMBER	
Maxine Waters	1	CALIFORNIA DNC MEMBER	(DNC Vote Only)
Rosalind Wyman	1	CALIFORNIA DNC MEMBER	
Laurence Zakson	1	CALIFORNIA DNC MEMBER	

Unpledged Delegates -- By State

Governor

Jerry Brown 1

US Representative

Pete Aguilar 1

Karen Bass 1

Xavier Becerra 1

Ami Bera 1

Julia Brownley 1

Lois Capps 1

Tony Cardenas 1

Judy Chu 1

Jim Costa 1

Susan Davis 1

Mark DeSaulnier 1

Anna Eshoo 1

Sam Farr 1

John Garamendi 1

Janice Hahn 1

Mike Honda 1

Jared Huffman 1

Ted Lieu 1

Zoe Lofgren 1

Alan Lowenthal 1

Doris Matsui 1

Jerry McNerney 1

Grace F. Napolitano 1

Scott Peters 1

Lucille Roybal-Allard 1

Raul Ruiz 1

Loretta Sanchez 1

Linda Sánchez 1

Adam Schiff 1

Brad Sherman 1

Jackie Speier 1

Eric Swalwell 1

Mark Takano 1

Mike Thompson 1

Norma Torres 1

Juan Vargas 1

US Senator

Barbara Boxer 1

Dianne Feinstein 1

Unpledged Delegates -- By StateState's Total Unpledged Delegate Votes: 71 State's Total Unpledged Delegates: 71**COLORADO**

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Beverly Benavidez Ryken	1	COLORADO DNC MEMBER
Anthony Graves	1	COLORADO DNC MEMBER
Michael Hancock	1	NATL. CONF. OF DEM. MAYORS
Blanca O'Leary	1	MEMBERS-AT-LARGE
Lisa Padilla	1	COLORADO DNC MEMBER
Rick Palacio	1	COLORADO DNC MEMBER
Mannie Rodriguez	1	COLORADO DNC MEMBER
<i>Governor</i>		
John Hickenlooper	1	
<i>US Representative</i>		
Diana DeGette	1	
Ed Perlmutter	1	
Jared Polis	1	
<i>US Senator</i>		
Michael Bennet	1	
<i>Dist. Party Leader</i>		<i>Leadership Position</i>
Roy Romer	1	FORMER DNC GENERAL CHAIRMAN

State's Total Unpledged Delegate Votes: 13 State's Total Unpledged Delegates: 13**CONNECTICUT**

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Dominic F. Balletto Jr.	1	CONNECTICUT DNC MEMBER
Michael Cacace	1	CONNECTICUT DNC MEMBER
Nancy DiNardo	1	CONNECTICUT DNC MEMBER
Dan Malloy	1	DEMOCRATIC GOVERNORS' ASSN. (DNC Vote Only)
Dorothy Mrowka	1	CONNECTICUT DNC MEMBER
John W. Olsen	1	CONNECTICUT DNC MEMBER
Joanne Sullivan	1	NATL. FED. OF DEM. WOMEN
<i>US Representative</i>		
Joe Courtney	1	
Rosa DeLauro	1	
Elizabeth Esty	1	
Jim Himes	1	
John Larson	1	
<i>US Senator</i>		
Richard Blumenthal	1	
Chris Murphy	1	
<i>Dist. Party Leader</i>		<i>Leadership Position</i>
Christopher J. Dodd	1	FORMER DNC GENERAL CHAIRMAN

Unpledged Delegates -- By State

State's Total Unpledged Delegate Votes: 15 State's Total Unpledged Delegates: 15

DELAWARE

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
John Danlallo	1	DELAWARE DNC MEMBER
Robert Gilligan	1	DELAWARE DNC MEMBER
Lisa B. Goodman	1	DELAWARE DNC MEMBER
Karen Kirkpatrick-Valentine	1	DELAWARE DNC MEMBER
Valerie Longhurst	1	DEM. LEGISLATIVE CAMPAIGN COMMITTEE
<i>Governor</i>		
Jack Markell	1	
<i>US Representative</i>		
John Carney	1	
<i>US Senator</i>		
Thomas Carper	1	
Christopher Coons	1	
<i>Dist. Party Leader</i>		<i>Leadership Position</i>
Joe Biden	1	VICE PRESIDENT

State's Total Unpledged Delegate Votes: 10 State's Total Unpledged Delegates: 10

DEMOCRATS ABROAD

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Robert Bragar	.5	DEMOCRATS ABROAD DNC MEMBER
John Eastwood	.5	DEMOCRATS ABROAD DNC MEMBER
Stanley Grossman	.5	DEMOCRATS ABROAD DNC MEMBER
Caitlin Kraft-Buchman	.5	DEMOCRATS ABROAD DNC MEMBER
Sandra Lorigans	.5	DEMOCRATS ABROAD DNC MEMBER
Kenneth Sherman	.5	DEMOCRATS ABROAD DNC MEMBER
Katie Solon	.5	DEMOCRATS ABROAD DNC MEMBER
Gary Suwannarat	.5	DEMOCRATS ABROAD DNC MEMBER

State's Total Unpledged Delegate Votes: 4 State's Total Unpledged Delegates: 8

DISTRICT OF COLUMBIA

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Jeff Berman	1	MEMBERS-AT-LARGE
James Boland	1	MEMBERS-AT-LARGE
Anita Bonds	1	DISTRICT OF COLUMBIA DNC MEMBER
Donna L. Brazile	1	OFFICERS
Mary Beth Cahill	1	MEMBERS-AT-LARGE
Mary Eva Candon	1	DISTRICT OF COLUMBIA DNC MEMBER
Maria Cardona	1	MEMBERS-AT-LARGE
Larry Cohen	1	MEMBERS-AT-LARGE
Arrington Dixon	1	DISTRICT OF COLUMBIA DNC MEMBER
Lily Eckelson Garcia	1	MEMBERS-AT-LARGE

Unpledged Delegates -- By State

Earl Fowlkes Jr.	1	MEMBERS-AT-LARGE
Harold Ickes	1	MEMBERS-AT-LARGE
Sunita Leeds	1	MEMBERS-AT-LARGE
Marcus Mason	1	MEMBERS-AT-LARGE
Minyon Moore	1	MEMBERS-AT-LARGE
Ed Potillo	1	DISTRICT OF COLUMBIA DNC MEMBER
Carrie Pugh	1	MEMBERS-AT-LARGE
Karl Racine	1	DEM ATTORNEYS GENERAL ASSN
Steve Regenstreif	1	NATL. DEM. SENIORS COORD. COUNCIL
Lee Saunders	1	MEMBERS-AT-LARGE
Rick Wade	1	MEMBERS-AT-LARGE
James J. Zogby	1	MEMBERS-AT-LARGE
Governor		
Muriel Bowser	1	
US Representative		
Earl Blumenauer	1	
Eleanor Holmes Norton	1	
US Senator		
Paul Strauss	1	
<hr/>		
State's Total Unpledged Delegate Votes: 26		State's Total Unpledged Delegates: 26

FLORIDA

DNC Member		DNC Affiliation Type	
Jon Ausman	1	FLORIDA DNC MEMBER	
Bret Berlin	1	FLORIDA DNC MEMBER	
Stephen Bittel	1	MEMBERS-AT-LARGE	
Rick Boylan	1	FLORIDA DNC MEMBER	
Mitchell Caesar	1	FLORIDA DNC MEMBER	
Alan Clendenin	1	FLORIDA DNC MEMBER	
Joyce Cusack	1	FLORIDA DNC MEMBER	
Joe Falk	1	MEMBERS-AT-LARGE	
Katherine Fernandez Rundel	1	MEMBERS-AT-LARGE	
Angel Gomez	1	MEMBERS-AT-LARGE	
Alma R. Gonzalez	1	FLORIDA DNC MEMBER	
Tony Hill	1	FLORIDA DNC MEMBER	
Nancy C. Jacobson	1	FLORIDA DNC MEMBER	
Cindy Lerner	1	NATL. DEM. MUNICIPAL OFFICIALS	
Carlos Odio	1	MEMBERS-AT-LARGE	
Annette Taddeo-Goldstein	1	FLORIDA DNC MEMBER	
Allison Tant	1	FLORIDA DNC MEMBER	
Andrew Tobias	1	OFFICERS	
Debbie Wasserman Schultz	1	OFFICERS	(DNC Vote Only)
Alan Williams	1	MEMBERS-AT-LARGE	

Unpledged Delegates -- By State

Marian Williams	1	FLORIDA DNC MEMBER
US Representative		
Corrine Brown	1	
Kathy Castor	1	
Ted Deutch	1	
Lois Frankel	1	
Gwen Graham	1	
Alan Grayson	1	
Alcee Hastings	1	
Patrick Murphy	1	
Frederica Wilson	1	
US Senator		
Bill Nelson	1	
Dist. Party Leader		
Ken Curtis	1	LEADERSHIP POSITION FORMER DNC CHAIRMAN

State's Total Unpledged Delegate Votes: 32 State's Total Unpledged Delegates: 32

GEORGIA

DNC Member		DNC Affiliation Type
Wendy Davis	1	GEORGIA DNC MEMBER
Dan Halpern	1	MEMBERS-AT-LARGE
DuBose Porter	1	GEORGIA DNC MEMBER
Richard Ray	1	GEORGIA DNC MEMBER
Kasim Reed	1	MEMBERS-AT-LARGE
Sally Rosser	1	GEORGIA DNC MEMBER
Pamela Stephenson	1	GEORGIA DNC MEMBER
Nikema Williams	1	GEORGIA DNC MEMBER
David Worley	1	GEORGIA DNC MEMBER
US Representative		
Sanford Bishop	1	
Hank Johnson	1	
John Lewis	1	
David Scott	1	
Dist. Party Leader		Leadership Position
Jimmy Carter	1	FORMER PRESIDENT

State's Total Unpledged Delegate Votes: 14 State's Total Unpledged Delegates: 14

GUAM

DNC Member		DNC Affiliation Type
Rory Respicio	1	GUAM DNC MEMBER
David Shimizu	1	GUAM DNC MEMBER
Taling Taitano	1	GUAM DNC MEMBER
Nerissa Underwood	1	GUAM DNC MEMBER

Unpledged Delegates -- By State

US Representative

Madeline Bordallo 1

State's Total Unpledged Delegate Votes: 5 State's Total Unpledged Delegates: 5

HAWAII

DNC Member

		DNC Affiliation Type	
Tulsi Gabbard	1	OFFICERS	(DNC Vote Only)
Jadine Nielsen	1	HAWAII DNC MEMBER	
Stephanie Ohigashi	1	HAWAII DNC MEMBER	
Russell Okata	1	HAWAII DNC MEMBER	
Douglas Pyle	1	HAWAII DNC MEMBER	

Governor

David Ige 1

US Representative

Mark Takai 1

US Senator

Mazie Hirono 1

Brian Schatz 1

State's Total Unpledged Delegate Votes: 9 State's Total Unpledged Delegates: 9

IDAHO

DNC Member

		DNC Affiliation Type
Carolyn Boyce	1	IDAHO DNC MEMBER
Jeanne Buell	1	IDAHO DNC MEMBER
Pete Gertonson	1	IDAHO DNC MEMBER
Bert Marley	1	IDAHO DNC MEMBER

State's Total Unpledged Delegate Votes: 4 State's Total Unpledged Delegates: 4

ILLINOIS

DNC Member

		DNC Affiliation Type	
Carrie Austin	1	ILLINOIS DNC MEMBER	
James Clayborne	1	MEMBERS-AT-LARGE	
Jerry Costello	1	ILLINOIS DNC MEMBER	
John Cullerton	1	ILLINOIS DNC MEMBER	
Danny K. Davis	1	ILLINOIS DNC MEMBER	(DNC Vote Only)
Raj Fernando	1	MEMBERS-AT-LARGE	
Daniel Hynes	1	ILLINOIS DNC MEMBER	
John Keller	1	YOUNG DEMOCRATS OF AMERICA	
Michael Madigan	1	ILLINOIS DNC MEMBER	
Iris Y. Martinez	1	ILLINOIS DNC MEMBER	
Jayne Mazzotti	1	ILLINOIS DNC MEMBER	
Steven Powell	1	MEMBERS-AT-LARGE	
Laura Ricketts	1	MEMBERS-AT-LARGE	
Carol Ronen	1	ILLINOIS DNC MEMBER	

Unpledged Delegates -- By State

Karen Yarborough	1	ILLINOIS DNC MEMBER
US Representative		
Cheri Bustos	1	
Tammy Duckworth	1	
Bill Foster	1	
Luis Gutiérrez	1	
Robin Kelly	1	
Dan Lipinski	1	
Michael Quigley	1	
Bobby Rush	1	
Jan Schakowsky	1	
US Senator:		
Richard Durbin	1	
Dist. Party Leader		
Barack Obama	1	PRESIDENT

Leadership Position

State's Total Unpledged Delegate Votes: 26 State's Total Unpledged Delegates: 26

INDIANA

DNC Member		DNC Affiliation Type
Dean Boerste	1	INDIANA DNC MEMBER
David A. Frye	1	INDIANA DNC MEMBER
Lacy M. Johnson	1	MEMBERS-AT-LARGE
Cordelia Lewis Burks	1	INDIANA DNC MEMBER
Shari Mellin	1	INDIANA DNC MEMBER
John C. Zody	1	INDIANA DNC MEMBER
US Representative		
André Carson	1	
Pete Visclosky	1	
US Senator		
Joe Donnelly	1	

State's Total Unpledged Delegate Votes: 9 State's Total Unpledged Delegates: 9

IOWA

DNC Member		DNC Affiliation Type
Jan Bauer	1	MEMBERS-AT-LARGE
Scott Brennan	1	IOWA DNC MEMBER
Michael Gronstal	1	DEM. LEGISLATIVE CAMPAIGN COMMITTEE
Linda Langston	1	NATL. DEM. COUNTY OFFICIALS
Andy McGuire	1	IOWA DNC MEMBER
Sandy Opstvedt	1	IOWA DNC MEMBER
Vacancy Vacancy	1	IOWA DNC MEMBER
US Representative		
Dave Loebsack	1	

Unpledged Delegates -- By StateState's Total Unpledged Delegate Votes: 8 State's Total Unpledged Delegates: 8**KANSAS**

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Kathryn Focke	1	KANSAS DNC MEMBER
Teresa Krusor	1	KANSAS DNC MEMBER
Larry Meeker	1	KANSAS DNC MEMBER
William R. Roy Jr.	1	KANSAS DNC MEMBER

State's Total Unpledged Delegate Votes: 4 State's Total Unpledged Delegates: 4**KENTUCKY**

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Patrick Hughes	1	KENTUCKY DNC MEMBER
Charlotte Lundergan	1	KENTUCKY DNC MEMBER
Charles E. Moore	1	KENTUCKY DNC MEMBER
Susie Watkins	1	KENTUCKY DNC MEMBER
<i>Governor</i>		
Steve Beshear	1	
<i>US Representative</i>		
John Yarmuth	1	

State's Total Unpledged Delegate Votes: 6 State's Total Unpledged Delegates: 6**LOUISIANA**

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Karen Carter Peterson	1	LOUISIANA DNC MEMBER
Ben L. Jeffers	1	LOUISIANA DNC MEMBER
Deborah Langhoff	1	LOUISIANA DNC MEMBER
Arthur Morrell	1	LOUISIANA DNC MEMBER
Shane Riddle	1	LOUISIANA DNC MEMBER
Arlanda Williams	1	NATL. DEM. COUNTY OFFICIALS
<i>US Representative</i>		
Cedric Richmond	1	

State's Total Unpledged Delegate Votes: 7 State's Total Unpledged Delegates: 7**MAINE**

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Maggie Allen	1	MAINE DNC MEMBER
Phillip Bartlett	1	MAINE DNC MEMBER
Troy Jackson	1	MAINE DNC MEMBER
Peggy Schaffer	1	MAINE DNC MEMBER
<i>US Representative</i>		
Chellie Pingree	1	

State's Total Unpledged Delegate Votes: 5 State's Total Unpledged Delegates: 5

Unpledged Delegates -- By State

MARYLAND

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Marla Cordone	1	NATL. DEM. SENIORS COORD. COUNCIL
Janice Griffin	1	MEMBERS-AT-LARGE
Victoria Jackson-Stanley	1	MARYLAND DNC MEMBER
Bel Leong-Hong	1	MEMBERS-AT-LARGE
Yvette Lewis	1	MEMBERS-AT-LARGE
Glenard S. Middleton	1	MARYLAND DNC MEMBER
Heather Mizeur	1	MARYLAND DNC MEMBER
Bruce A. Morrison	1	NATL. DEM. ETHNIC COORD. COUNCIL
Gregory Pecoraro	1	MARYLAND DNC MEMBER
Carol Pensky	1	MEMBERS-AT-LARGE
D. Bruce Poole	1	MARYLAND DNC MEMBER
Karren Pope-Onwukwe	1	MARYLAND DNC MEMBER
Stephanie Rawlings-Blake	1	OFFICERS
<i>US Representative</i>		
Elijah Cummings	1	
John Delaney	1	
Donna Edwards	1	
Steny Hoyer	1	
Dutch Ruppersberger	1	
John Sarbanes	1	
Chris Van Hollen	1	
<i>US Senator</i>		
Ben Cardin	1	
Barbara Mikulski	1	
<i>Dist. Party Leader</i>		<i>Leadership Position</i>
Joe Andrew	1	FORMER DNC CHAIRMAN

State's Total Unpledged Delegate Votes: 23 State's Total Unpledged Delegates: 23

MASSACHUSETTS

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Virginia Barnes	1	MEMBERS-AT-LARGE
Gus Bickford	1	MASSACHUSETTS DNC MEMBER
Kate Donaghue	1	MASSACHUSETTS DNC MEMBER
Raymond A. Jordan	1	MASSACHUSETTS DNC MEMBER
Elaine C. Kamarck	1	MEMBERS-AT-LARGE
Debra Kozikowski	1	MASSACHUSETTS DNC MEMBER
Thomas M. McGee	1	MASSACHUSETTS DNC MEMBER
Marvin McMoore	1	COLLEGE DEMOCRATS OF AMERICA
David M. O'Brien	1	MASSACHUSETTS DNC MEMBER
James Roosevelt Jr.	1	MEMBERS-AT-LARGE
Susan Thomson	1	MASSACHUSETTS DNC MEMBER

Unpledged Delegates -- By State**US Representative**

Michael E. Capuano	1
Katherine Clark	1
Bill Keating	1
Joseph Kennedy III	1
Stephen Lynch	1
Jim McGovern	1
Seth Moulton	1
Richard Neal	1
Niki Tsongas	1

US Senator

Edward Markey	1
Elizabeth Warren	1

Dist. Party Leader

Debra DeLee	1	Leadership Position FORMER DNC CHAIRMAN
Steve Grossman	1	FORMER DNC CHAIRMAN
Paul G. Kirk Jr.	1	FORMER DNC CHAIRMAN

State's Total Unpledged Delegate Votes: 25 State's Total Unpledged Delegates: 25

MICHIGAN**DNC Member**

Jill Alper	1	DNC Affiliation Type MICHIGAN DNC MEMBER
Dennis W. Archer	1	MEMBERS-AT-LARGE
Steve Cook	1	MICHIGAN DNC MEMBER
Brandon Dillon	1	MICHIGAN DNC MEMBER
Debbie Dingell	1	MICHIGAN DNC MEMBER
Mary Fleming	1	MICHIGAN DNC MEMBER
Barry Goodman	1	MICHIGAN DNC MEMBER
Norwood Jewell	1	MICHIGAN DNC MEMBER
Daryl Newman	1	MICHIGAN DNC MEMBER
Nancy Quarles	1	MICHIGAN DNC MEMBER
Virgie M. Rollins	1	NATL. FED. OF DEM. WOMEN
Debbie Stabenow	1	CONGRESSIONAL REPRESENTATIVES (DNC Vote Only)

US Representative

John Conyers	1
Debbie Dingell	1
Dan Kildee	1
Brenda Lawrence	1
Sander Levin	1

US Senator

Gary Peters	1
-------------	---

State's Total Unpledged Delegate Votes: 18 State's Total Unpledged Delegates: 18

MINNESOTA

Unpledged Delegates -- By State

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Marge Hoffa	1	MINNESOTA DNC MEMBER
Ken Martin	1	MINNESOTA DNC MEMBER
Javier Morillo-Alicea	1	MINNESOTA DNC MEMBER
R.T. Rybak	1	OFFICERS
Nancy Schumacher	1	MINNESOTA DNC MEMBER
Lori Sellner	1	MINNESOTA DNC MEMBER
Rick Stafford	1	MINNESOTA DNC MEMBER
<i>Governor</i>		
Mark Dayton	1	
<i>US Representative</i>		
Keith Ellison	1	
Betty McCollum	1	
Rick Nolan	1	
Collin Peterson	1	
Tim Walz	1	
<i>US Senator</i>		
Al Franken	1	
Amy Klobuchar	1	
<i>Dist. Party Leader</i>		
Walter Mondale	1	LEADERSHIP POSITION
		FORMER VICE PRESIDENT

State's Total Unpledged Delegate Votes: 16 State's Total Unpledged Delegates: 16

MISSISSIPPI

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Rickey L. Cole	1	MISSISSIPPI DNC MEMBER
Vellena Greer	1	MISSISSIPPI DNC MEMBER
Johnnie Patton	1	MISSISSIPPI DNC MEMBER
Keelan Sanders	1	MISSISSIPPI DNC MEMBER
<i>US Representative</i>		
Bennie Thompson	1	

State's Total Unpledged Delegate Votes: 5 State's Total Unpledged Delegates: 5

MISSOURI

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Doug Brooks	1	MISSOURI DNC MEMBER
Melba Curls	1	MISSOURI DNC MEMBER
Darlene Green	1	MISSOURI DNC MEMBER
Sly James	1	NATL. CONF. OF DEM. MAYORS
Sandra A. Querry	1	MISSOURI DNC MEMBER
Matthew Robinson	1	MISSOURI DNC MEMBER
Roy Temple	1	MISSOURI DNC MEMBER
Brian Wahby	1	MEMBERS-AT-LARGE

Unpledged Delegates -- By State

Governor

Jay Nixon 1

US Representative

William Lacy Clay 1

Emanuel Cleaver II 1

US Senator

Claire McCaskill 1

Dist. Party Leader

Richard Gephardt 1

Leadership Position

FORMER HOUSE MINORITY LEADER

State's Total Unpledged Delegate Votes: 13 State's Total Unpledged Delegates: 13

MONTANA

DNC Member

Steve Bullock 1

Jacquie Helt 1

Jim Larson 1

Jean Lemire Dahlman 1

Jorge Quintana 1

US Senator

Jon Tester 1

DNC Affiliation Type

DEMOCRATIC GOVERNORS' ASSN.

(DNC Vote Only)

MONTANA DNC MEMBER

MONTANA DNC MEMBER

MONTANA DNC MEMBER

MONTANA DNC MEMBER

State's Total Unpledged Delegate Votes: 6 State's Total Unpledged Delegates: 6

NEBRASKA

DNC Member

Ron Kaminski 1

Maureen Monahan 1

Vince Powers 1

Patricia Zieg 1

US Representative

Brad Ashford 1

DNC Affiliation Type

NEBRASKA DNC MEMBER

NEBRASKA DNC MEMBER

NEBRASKA DNC MEMBER

NEBRASKA DNC MEMBER

State's Total Unpledged Delegate Votes: 5 State's Total Unpledged Delegates: 5

NEVADA

DNC Member

Erin Billbray-Kohn 1

Artie Blanco 1

Ruben Kihuen 1

Roberta Lange 1

Andres Ramirez 1

Harry Reid 1

Chris Wicker 1

US Representative

Dina Titus 1

DNC Affiliation Type

NEVADA DNC MEMBER

MEMBERS-AT-LARGE

NEVADA DNC MEMBER

NEVADA DNC MEMBER

MEMBERS-AT-LARGE

CONGRESSIONAL REPRESENTATIVES

(DNC Vote Only)

NEVADA DNC MEMBER

Unpledged Delegates -- By State

State's Total Unpledged Delegate Votes: 8 State's Total Unpledged Delegates: 8

NEW HAMPSHIRE

DNC Member

		DNC Affiliation Type
Raymond Buckley	1	NEW HAMPSHIRE DNC MEMBER
Joanne Dowdell	1	MEMBERS-AT-LARGE
Martha Fuller Clark	1	NEW HAMPSHIRE DNC MEMBER
Maggie Hassan	1	DEMOCRATIC GOVERNORS' ASSN.
William Shaheen	1	NEW HAMPSHIRE DNC MEMBER
Kathleen Sullivan	1	NEW HAMPSHIRE DNC MEMBER

(DNC Vote Only)

US Representative

Ann McLane Kuster	1
-------------------	---

US Senator

Jeanne Shaheen	1
----------------	---

State's Total Unpledged Delegate Votes: 8 State's Total Unpledged Delegates: 8

NEW JERSEY

DNC Member

		DNC Affiliation Type
Tonio Burgos	1	NEW JERSEY DNC MEMBER
Barbra Casbar Siperstein	1	MEMBERS-AT-LARGE
John Currie	1	NEW JERSEY DNC MEMBER
Lizette Delgado-Polanca	1	NEW JERSEY DNC MEMBER
Reni Erdos	1	NEW JERSEY DNC MEMBER
Marcia Marley	1	NEW JERSEY DNC MEMBER
George E. Norcross III	1	NEW JERSEY DNC MEMBER
John Wisniewski	1	NEW JERSEY DNC MEMBER

US Representative

Donald Norcross	1
Frank Pallone Jr.	1
Bill Pascrell	1
Donald Payne Jr.	1
Albio Sires	1
Bonnie Watson-Coleman	1

US Senator

Cory Booker	1
Robert Menendez	1

State's Total Unpledged Delegate Votes: 16 State's Total Unpledged Delegates: 16

NEW MEXICO

DNC Member

		DNC Affiliation Type
Joni Marie Guterrez	1	NEW MEXICO DNC MEMBER
Debra Haaland	1	NEW MEXICO DNC MEMBER
Raymond Sanchez	1	NEW MEXICO DNC MEMBER
Juan Sanchez III	1	NEW MEXICO DNC MEMBER

Unpledged Delegates -- By State**US Representative**

Michelle Lujan Grisham 1
Ben R. Luján 1

US Senator

Martin Heinrich 1
Tom Udall 1

Dist. Party Leader

Fred R. Harris 1

Leadership Position

FORMER DNC CHAIRMAN

State's Total Unpledged Delegate Votes: 9 State's Total Unpledged Delegates: 9

NEW YORK**DNC Member**

Stuart H. Applebaum 1 NEW YORK DNC MEMBER
Laphonza Butler 1 MEMBERS-AT-LARGE
Maria C. Cole 1 NEW YORK DNC MEMBER
Sheila A. Comar 1 NEW YORK DNC MEMBER
Vivian Cook 1 NEW YORK DNC MEMBER
Jennifer Cunningham 1 NEW YORK DNC MEMBER
Leah Daughtry 1 MEMBERS-AT-LARGE
Ralph Dawson 1 MEMBERS-AT-LARGE
Barbaralee Diamonstein Spielvogel 1 MEMBERS-AT-LARGE
Herman Farrell Jr. 1 NEW YORK DNC MEMBER
Hector Figueroa 1 MEMBERS-AT-LARGE
Emily Giske 1 NEW YORK DNC MEMBER
Jay Jacobs 1 MEMBERS-AT-LARGE
Sarah Kovner 1 MEMBERS-AT-LARGE
Gregory Meeks 1 CONGRESSIONAL REPRESENTATIVES
Stephanie Miner 1 NEW YORK DNC MEMBER
David Paterson 1 NEW YORK DNC MEMBER
Dennis Rivera 1 NEW YORK DNC MEMBER
Sheldon Silver 1 NEW YORK DNC MEMBER
Gerard Sweeney 1 NEW YORK DNC MEMBER
Randi Weingarten 1 MEMBERS-AT-LARGE
Robert Zimmerman 1 NEW YORK DNC MEMBER

(DNC Vote Only)

Governor

Andrew Cuomo 1

US Representative

Yvette D. Clarke 1
Joe Crowley 1
Eliot Engel 1
Brian Higgins 1
Steve Israel 1
Hakeem Jeffries 1

Unpledged Delegates -- By State

Nita Lowey	1	
Carolyn Maloney	1	
Sean Patrick Maloney	1	
Grace Meng	1	
Jerrold Nadler	1	
Charles B. Rangel	1	
Kathleen Rice	1	
José Serrano	1	
Louise Slaughter	1	
Paul Tonko	1	
Nydia Velázquez	1	
US Senator		
Kirsten Gillibrand	1	
Charles Schumer	1	
Dist. Party Leader		
Bill Clinton	1	Leadership Position FORMER PRESIDENT
George Mitchell	1	FORMER SENATE MAJORITY LEADER
<hr/>		
State's Total Unpledged Delegate Votes:		<u>44</u>
State's Total Unpledged Delegates:		<u>44</u>

NORTH CAROLINA

DNC Member		DNC Affiliation Type
Joyce Brayboy	1	MEMBERS-AT-LARGE
Pat Cotham	1	NORTH CAROLINA DNC MEMBER
Jeanette Council	1	NORTH CAROLINA DNC MEMBER
Janet Cowell	1	NATL. ASSN. OF DEM. ST. TREASURERS
J. David Cox	1	MEMBERS-AT-LARGE
Olma Echeverri	1	NORTH CAROLINA DNC MEMBER
Akilah Ensley	1	YOUNG DEMOCRATS OF AMERICA
Zack Hawkins	1	NORTH CAROLINA DNC MEMBER
Patsy Keever	1	NORTH CAROLINA DNC MEMBER
Jake Quinn	1	NORTH CAROLINA DNC MEMBER
Everett Ward	1	NORTH CAROLINA DNC MEMBER
US Representative		
Alma Adams	1	
G. K. Butterfield	1	
David Price	1	
<hr/>		
State's Total Unpledged Delegate Votes:		<u>14</u>
State's Total Unpledged Delegates:		<u>14</u>

NORTH DAKOTA

DNC Member		DNC Affiliation Type
Warren Larson	1	NORTH DAKOTA DNC MEMBER
Chad Nodland	1	NORTH DAKOTA DNC MEMBER
Kylie Oversen	1	NORTH DAKOTA DNC MEMBER

Unpledged Delegates -- By State

Renee Pfenning 1 NORTH DAKOTA DNC MEMBER

US Senator

Heidi Helmkamp 1

State's Total Unpledged Delegate Votes: 5 State's Total Unpledged Delegates: 5

NORTHERN MARIANA IS.

DNC Member

DNC Affiliation Type

Rosiky F. Camacho 1 NORTHERN MARIANA IS. DNC MEMBER

Emelia S. Chargualaf 1 NORTHERN MARIANA IS. DNC MEMBER

Theresita B. Pertudo 1 NORTHERN MARIANA IS. DNC MEMBER

John Tunela 1 NORTHERN MARIANA IS. DNC MEMBER

US Representative

Gregorio Sablan 1

State's Total Unpledged Delegate Votes: 5 State's Total Unpledged Delegates: 5

OHIO

DNC Member

DNC Affiliation Type

Jocelyn Bucaro 1 OHIO DNC MEMBER

Kathleen Clyde 1 OHIO DNC MEMBER

Isabel Frammer 1 MEMBERS-AT-LARGE

Patricia Frost-Brooks 1 OHIO DNC MEMBER

Mark Mallory 1 OHIO DNC MEMBER

Ronald L. Malone 1 OHIO DNC MEMBER

Valerie J. McCall 1 OHIO DNC MEMBER

Rhine L. McLin 1 OHIO DNC MEMBER

David Pepper 1 OHIO DNC MEMBER

Joe Rugola 1 OHIO DNC MEMBER

US Representative

Joyce Beatty 1

Marcia Fudge 1

Marcy Kaptur 1

Tim Ryan 1

US Senator

Sherrod Brown 1

Dist. Party Leader

Leadership Position

David Wilhelm 1 FORMER DNC CHAIRMAN

State's Total Unpledged Delegate Votes: 16 State's Total Unpledged Delegates: 16

OKLAHOMA

DNC Member

DNC Affiliation Type

Jim Frasier 1 OKLAHOMA DNC MEMBER

Mark Hammons 1 OKLAHOMA DNC MEMBER

Connie Johnson 1 OKLAHOMA DNC MEMBER

Betty McElderry 1 OKLAHOMA DNC MEMBER

Unpledged Delegates -- By StateState's Total Unpledged Delegate Votes: 4 State's Total Unpledged Delegates: 4**OREGON**

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Laura Calvo	1	OREGON DNC MEMBER
Frank Dixon	1	OREGON DNC MEMBER
Lupita Maurer	1	OREGON DNC MEMBER
Karen Packer	1	OREGON DNC MEMBER
Ellen Rosenblum	1	DEM ATTORNEYS GENERAL ASSN
Larry Taylor	1	OREGON DNC MEMBER
<i>Governor</i>		
Kate Brown	1	
<i>US Representative</i>		
Suzanne Bonamici	1	
Peter DeFazio	1	
Kurt Schrader	1	
<i>US Senator</i>		
Jeff Merkley	1	
Ron Wyden	1	

State's Total Unpledged Delegate Votes: 12 State's Total Unpledged Delegates: 12**PENNSYLVANIA**

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Rick Bloomingdale	1	PENNSYLVANIA DNC MEMBER
James Burn Jr.	1	PENNSYLVANIA DNC MEMBER
Tony Coelho	1	MEMBERS-AT-LARGE
Ronald R. Donatucci	1	PENNSYLVANIA DNC MEMBER
Penny Gerber	1	PENNSYLVANIA DNC MEMBER
Amanda Green-Hawkins	1	MEMBERS-AT-LARGE
Marcel Groen	1	PENNSYLVANIA DNC MEMBER
Nancy Patton Mills	1	PENNSYLVANIA DNC MEMBER
Ian Murray	1	PENNSYLVANIA DNC MEMBER
Michael Nutter	1	MEMBERS-AT-LARGE
Evelyn Rafalko-McNulty	1	PENNSYLVANIA DNC MEMBER
Marian B. Tasco	1	PENNSYLVANIA DNC MEMBER
Sylvia Wilson	1	PENNSYLVANIA DNC MEMBER
<i>Governor</i>		
Tom Wolf	1	
<i>US Representative</i>		
Brendan Boyle	1	
Robert Brady	1	
Matt Cartwright	1	
Mike Doyle	1	
Chaka Fattah	1	

Unpledged Delegates -- By State

US Senator

Robert P. Casey Jr. 1

Dist. Party Leader

Ed Rendell 1

Leadership Position

FORMER DNC GENERAL CHAIRMAN

State's Total Unpledged Delegate Votes: 21 State's Total Unpledged Delegates: 21

PUERTO RICO

DNC Member

Luisette Cabanas Colon 1

Andres Lopez 1

Kenneth McClintock 1

Liza Ortiz Camacho 1

Roberto L. Prats 1

DNC Affiliation Type

PUERTO RICO DNC MEMBER

MEMBERS-AT-LARGE

PUERTO RICO DNC MEMBER

PUERTO RICO DNC MEMBER

PUERTO RICO DNC MEMBER

Governor

Alejandro Garcia Padilla 1

US Representative

Pedro Pierluisi 1

State's Total Unpledged Delegate Votes: 7 State's Total Unpledged Delegates: 7

RHODE ISLAND

DNC Member

Grace Diaz 1

Joseph McNamara 1

Frank Montanaro Sr. 1

Edna O'Neill Mattson 1

DNC Affiliation Type

RHODE ISLAND DNC MEMBER

RHODE ISLAND DNC MEMBER

RHODE ISLAND DNC MEMBER

RHODE ISLAND DNC MEMBER

Governor

Gina Raimondo 1

US Representative

David Cicilline 1

James Langevin 1

US Senator

Jack Reed 1

Sheldon Whitehouse 1

State's Total Unpledged Delegate Votes: 9 State's Total Unpledged Delegates: 9

SOUTH CAROLINA

DNC Member

Boyd Brown 1

Gilda Cobb-Hunter 1

Donald L. Fowler 1

Jamie R. Harrison 1

Kaye Lingle Koonce 1

DNC Affiliation Type

SOUTH CAROLINA DNC MEMBER

SOUTH CAROLINA DNC MEMBER

MEMBERS-AT-LARGE & FORMER DNC CHAIRMAN (DNC Vote Only)

SOUTH CAROLINA DNC MEMBER

SOUTH CAROLINA DNC MEMBER

US Representative

Jim Clyburn 1

Unpledged Delegates -- By State

State's Total Unpledged Delegate Votes: 6 State's Total Unpledged Delegates: 6

SOUTH DAKOTA

<i>DNC Member</i>		DNC Affiliation Type
Joe Lowe	1	<i>SOUTH DAKOTA DNC MEMBER</i>
Nick Nemeč	1	<i>SOUTH DAKOTA DNC MEMBER</i>
Sharon Stroschein	1	<i>SOUTH DAKOTA DNC MEMBER</i>
Ann Tornberg	1	<i>SOUTH DAKOTA DNC MEMBER</i>
<i>Dist. Party Leader</i>		Leadership Position
Tom A. Daschle	1	<i>FORMER SENATE MINORITY LEADER</i>

State's Total Unpledged Delegate Votes: 5 State's Total Unpledged Delegates: 5

TENNESSEE

<i>DNC Member</i>		DNC Affiliation Type
Will Cheek	1	<i>TENNESSEE DNC MEMBER</i>
Gale Jones Carson	1	<i>TENNESSEE DNC MEMBER</i>
John Litz	1	<i>TENNESSEE DNC MEMBER</i>
Myron Lowery	1	<i>NATL. DEM. MUNICIPAL OFFICIALS</i>
Mary Mancini	1	<i>TENNESSEE DNC MEMBER</i>
William Owen	1	<i>TENNESSEE DNC MEMBER</i>
<i>US Representative</i>		
Steve Cohen	1	
Jim Cooper	1	
<i>Dist. Party Leader</i>		Leadership Position
Albert Gore Jr	1	<i>FORMER VICE PRESIDENT</i>

State's Total Unpledged Delegate Votes: 9 State's Total Unpledged Delegates: 9

TEXAS

<i>DNC Member</i>		DNC Affiliation Type
Rafael Anchia	1	<i>MEMBERS-AT-LARGE</i>
Garnet Coleman	1	<i>DEM. LEGISLATIVE CAMPAIGN COMMITTEE</i>
Yvonne Davis	1	<i>TEXAS DNC MEMBER</i>
Monsterrat Garibay	1	<i>MEMBERS-AT-LARGE</i>
Carol Guthrie	1	<i>MEMBERS-AT-LARGE</i>
Gilberto Hinojosa	1	<i>TEXAS DNC MEMBER</i>
Glen Maxey	1	<i>TEXAS DNC MEMBER</i>
Lorraine C. Miller	1	<i>MEMBERS-AT-LARGE</i>
Henry R. Munoz, III	1	<i>OFFICERS</i>
Katie Naranjo	1	<i>TEXAS DNC MEMBER</i>
Annis Parker	1	<i>NATL. CONF. OF DEM. MAYORS</i>
John Patrick	1	<i>TEXAS DNC MEMBER</i>
Fredericka Phillips	1	<i>TEXAS DNC MEMBER</i>
Betty Richie	1	<i>TEXAS DNC MEMBER</i>
Jose Rodriguez	1	<i>TEXAS DNC MEMBER</i>

Unpledged Delegates -- By State

Lenora Sorola-Pohlman	1	TEXAS DNC MEMBER
Dennis Speight	1	TEXAS DNC MEMBER
Senfronia Thompson	1	TEXAS DNC MEMBER
Royce West	1	TEXAS DNC MEMBER
US Representative		
Joaquin Castro	1	
Henry Cuellar	1	
Lloyd Doggett	1	
Al Green	1	
Gene Green	1	
Rubén Hinojosa	1	
Sheila Jackson-Lee	1	
Eddie Bernice Johnson	1	
Beto O'Rourke	1	
Marc Veasey	1	
Filemon Vela	1	

State's Total Unpledged Delegate Votes: 30 State's Total Unpledged Delegates: 30

UTAH

DNC Member		DNC Affiliation Type
Patrice Arent	1	UTAH DNC MEMBER
Peter Corroon	1	UTAH DNC MEMBER
Wayne Holland Jr.	1	UTAH DNC MEMBER
Breanne Miller	1	UTAH DNC MEMBER

State's Total Unpledged Delegate Votes: 4 State's Total Unpledged Delegates: 4

VERMONT

DNC Member		DNC Affiliation Type
Richard Cassidy	1	VERMONT DNC MEMBER
Jim Condos	1	DEM ASSN OF SECRETARIES OF STATE
Dottie Deans	1	VERMONT DNC MEMBER
Billi Gosh	1	VERMONT DNC MEMBER
Tim Jerman	1	VERMONT DNC MEMBER
Governor		
Peter Shumlin	1	
US Representative		
Peter Welch	1	
US Senator		
Patrick Leahy	1	
Bernie Sanders	1	
Dist. Party Leader		Leadership Position
Howard Dean	1	FORMER DNC CHAIRMAN

State's Total Unpledged Delegate Votes: 10 State's Total Unpledged Delegates: 10



Unpledged Delegates -- By State

VIRGIN ISLANDS

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Cecil R. Benjamin	1	VIRGIN ISLANDS DNC MEMBER
Carol M. Burke	1	VIRGIN ISLANDS DNC MEMBER
Emmett Hansen	1	VIRGIN ISLANDS DNC MEMBER
Pamela R. Samuel	1	VIRGIN ISLANDS DNC MEMBER
<i>US Representative</i>		
Stacey Plaskett	1	

State's Total Unpledged Delegate Votes: 5 State's Total Unpledged Delegates: 5

VIRGINIA

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Sandra W. Brandt	1	VIRGINIA DNC MEMBER
Doris Crouse Mays	1	VIRGINIA DNC MEMBER
Louis Elrod	1	YOUNG DEMOCRATS OF AMERICA
Alice Germond	1	MEMBERS-AT-LARGE
Fred Hudson	1	VIRGINIA DNC MEMBER
Frank Leone	1	VIRGINIA DNC MEMBER
Jennifer McClellan	1	MEMBERS-AT-LARGE
Susan Swecker	1	VIRGINIA DNC MEMBER
George Wallace	1	VIRGINIA DNC MEMBER
<i>Governor</i>		<i>Leadership Position</i>
Terence R. McAuliffe	1	FORMER DNC CHAIRMAN
<i>US Representative</i>		
Don Beyer	1	
Gerry Connolly	1	
Bobby Scott	1	
<i>US Senator</i>		<i>Leadership Position</i>
Tim Kaine	1	FORMER DNC CHAIRMAN
Mark Warner	1	

State's Total Unpledged Delegate Votes: 15 State's Total Unpledged Delegates: 15

WASHINGTON

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Valerie Brady Rongey	1	WASHINGTON DNC MEMBER
Ed Cote	1	WASHINGTON DNC MEMBER
Juanita Luiz	1	MEMBERS-AT-LARGE
Sharon Mast	1	WASHINGTON DNC MEMBER
David T. McDonald	1	WASHINGTON DNC MEMBER
Rion Ramirez	1	MEMBERS-AT-LARGE
Jaxon Ravens	1	WASHINGTON DNC MEMBER
Lona Wilbur	1	WASHINGTON DNC MEMBER
<i>Governor</i>		
Jay Inslee	1	

Unpledged Delegates -- By State

US Representative

Suzan DelBene	1
Dennis Heck	1
Derek Kilmer	1
Rick Larsen	1
Jim McDermott	1
Adam Smith	1

US Senator

Maria Cantwell	1
Patty Murray	1

State's Total Unpledged Delegate Votes: 17 State's Total Unpledged Delegates: 17

WEST VIRGINIA

DNC Member

		DNC Affiliation Type
Belinda Biafore	1	WEST VIRGINIA DNC MEMBER
Elaine A. Harris	1	WEST VIRGINIA DNC MEMBER
Pat Maroney	1	WEST VIRGINIA DNC MEMBER
John Perdue	1	NATL. ASSN. OF DEM. ST. TREASURERS
Chris Regan	1	WEST VIRGINIA DNC MEMBER
Natalie Tennant	1	DEM ASSN OF SECRETARIES OF STATE

Governor

Earl Ray Tomblin	1
------------------	---

US Senator

Joe Manchin III	1
-----------------	---

State's Total Unpledged Delegate Votes: 8 State's Total Unpledged Delegates: 8

WISCONSIN

DNC Member

		DNC Affiliation Type
David Bowen	1	WISCONSIN DNC MEMBER
Christine Bremer Muggli	1	WISCONSIN DNC MEMBER
Martha Laning	1	WISCONSIN DNC MEMBER
Martha Love	1	WISCONSIN DNC MEMBER
Jason Rae	1	WISCONSIN DNC MEMBER
Vacancy Vacancy	1	WISCONSIN DNC MEMBER

US Representative

Ron Kind	1
Gwen Moore	1
Mark Pocan	1

US Senator

Tammy Baldwin	1
---------------	---

State's Total Unpledged Delegate Votes: 10 State's Total Unpledged Delegates: 10

WYOMING

Unpledged Delegates -- By State

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Ana Cuprill	1	WYOMING DNC MEMBER
Mike Gierau	1	WYOMING DNC MEMBER
Mary Hales	1	WYOMING DNC MEMBER
Bruce Palmer	1	WYOMING DNC MEMBER

State's Total Unpledged Delegate Votes: 4 State's Total Unpledged Delegates: 4

UNASSIGNED

<i>DNC Member</i>		<i>DNC Affiliation Type</i>
Vacancy	1	NATL. ASSN. OF DEM. LT. GOVERNORS
Vacancy	1	NATL. ASSN. OF DEM. LT. GOVERNORS
Vacancy Vacancy	1	COLLEGE DEMOCRATS OF AMERICA

State's Total Unpledged Delegate Votes: 3 State's Total Unpledged Delegates: 3



State's Total Unpledged Delegate Votes: State's Total Unpledged Delegates: 0

Grand Total Unpledged Delegate Votes: 713 Grand Total Unpledged Delegates: 717

F

STATE OF NEW HAMPSHIRE

BALLOT LAW COMMISSION

Docket No. 2015-03

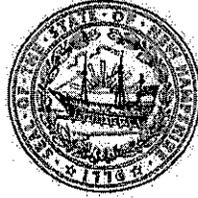
In re the Presidential Declaration of Candidacy of Senator Bernie Sanders

**Reply to Challenge to Senator Sanders as
a Qualified Candidate for the Democratic Presidential Nomination
and Motion to Dismiss for Lack of Standing and Lack of Jurisdiction**

Exhibit F

NEW HAMPSHIRE
DEPARTMENT OF STATE

William M. Gardner
Secretary of State



Robert P. Ambrose
Senior Deputy Secretary of State

David M. Scanlan
Deputy Secretary of State

BERNIE SANDERS
Burlington, Vermont

This office has received your declaration of candidacy as a **DEMOCRATIC** candidate for the Office of **PRESIDENT OF THE UNITED STATES**. Your name and address will appear on the ballot as it is printed above.

To make certain that all ballots will be printed correctly, please notify this office as soon as possible if any of the information above is incorrect.

A handwritten signature in cursive script that reads "Karen Ladd".

Karen Ladd
Assistant Secretary of State

November 6, 2015

State House Room 204, 107 N. Main St., Concord, N.H. 03301
Phone: 603-271-3242 Fax: 603-271-6316
TDD Access: Relay NH 1-800-785-2964
www.nh.gov/sos email: elections@sos.state.nh.us

G

STATE OF NEW HAMPSHIRE

BALLOT LAW COMMISSION

Docket No. 2015-03

In re the Presidential Declaration of Candidacy of Senator Bernie Sanders

**Reply to Challenge to Senator Sanders as
a Qualified Candidate for the Democratic Presidential Nomination
and Motion to Dismiss for Lack of Standing and Lack of Jurisdiction**

Exhibit G

FEC FORM 2

STATEMENT OF CANDIDACY



1. (a) Name of Candidate (in full) Andy Martinx			2. Candidate's FEC Identification Number P60008943	
(b) Address (number and street) PO Box 1851		<input type="checkbox"/> Check if address changed		
(c) City, State, and ZIP Code New York NY 10150-1851		3. Is This Statement <input checked="" type="checkbox"/> New (N) OR <input type="checkbox"/> Amended (A)		
4. Party Affiliation REPUBLICAN PARTY	5. Office Sought Presidential	6. State & District of Candidate		

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

7. I hereby designate the following named political committee as my Principal Campaign Committee for the 2016 election(s).
(year of election)

NOTE: This designation should be filed with the appropriate office listed in the instructions.

(a) Name of Committee (in full) Andy Martin for America		
(b) Address (number and street) PO Box 1851		
(c) City, State, and ZIP Code New York NY 10150		

DESIGNATION OF OTHER AUTHORIZED COMMITTEES

(Including Joint Fundraising Representatives)

8. I hereby authorize the following named committee, which is NOT my principal campaign committee, to receive and expend funds on behalf of my candidacy.

NOTE: This designation should be filed with the principal campaign committee.

(a) Name of Committee (in full)		
(b) Address (number and street)		
(c) City, State, and ZIP Code		

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Signature of Candidate Andy Martin	Date 07/16/2015
<i>[Electronically Filed]</i>	

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to penalties of 2 U.S.C. §437g.

--	--	--	--	--	--	--	--	--