

STATE OF NEW HAMPSHIRE

Ballot Law Commission

No. _____

**Challenge of Kathleen N. Sullivan, Hazel R. Tremblay, Dorie M. Grizzard
and Brian Farias to Ralph Nader Nomination Papers**

Kathleen N. Sullivan, Hazel R. Tremblay, Dorie M. Grizzard, and Brian Farias (collectively referred to herein as "Challengers"), by their counsel, challenge, pursuant to N.H. RSA 655:44, the nomination papers filed by representatives of the Ralph Nader for President Campaign with the New Hampshire Secretary of State on September 3, 2004. As set forth herein, Ralph Nader ("Nader") is ineligible to be placed on the ballot for the following reasons:

- Nader did not submit a sufficient number of valid petitions in the Second Congressional District;
- Individuals soliciting signatures to place Nader on the ballot engaged in widespread fraud and dishonesty;
- Nader failed to specify the political organization or principles he represents, as the so-called "Independent Party," which is listed on Nader's petitions, does not exist; and
- Nader failed to collect signatures for Jan Pierce, his designated running mate in New Hampshire, and has designated a different running mate in other states.

1. Kathleen N. Sullivan is a registered voter in the City of Manchester and chair of the New Hampshire Democratic State Committee. Hazel R. Tremblay is a registered voter in the City of Manchester who was fraudulently induced into signing a nomination paper for Nader. Manchester is in New Hampshire's First Congressional District. Dorie M. Grizzard is a registered voter in the City of Nashua who was fraudulently induced into signing a nomination

paper for Nader. Brian Farias is a registered voter in the City of Keene whose signature was forged on to a nomination paper for Nader. Nashua and Keene are in New Hampshire's Second Congressional District.

2. On or about June 9, 2004, Nader filed a declaration of intent to be a candidate for president with the New Hampshire Secretary of State pursuant to N.H. RSA 655:17-b.

3. On September 3, 2004, representatives of the Ralph Nader for President campaign filed with the Secretary of State approximately 1,784 nomination papers purportedly signed by duly registered voters in Congressional District 2 and approximately 2,042 nomination papers purportedly signed by duly registered voters in Congressional District 1.

4. Under RSA 655:42, a candidate for president through the nomination papers process must submit valid nomination papers from 1,500 duly registered voters in each of New Hampshire's two congressional districts.

5. As a result of the number of invalid nomination papers, dishonesty in the collection of Nader nomination papers, unlawful assertion on Nader nomination papers that Nader is a candidate of the fictitious "Independent Party," and failure of Nader to include the name of his designated vice-presidential running mate on his nomination papers or file nomination papers on her behalf, the Ballot Law Commission should disqualify Nader from appearing on the New Hampshire general election ballot as a candidate for president of the United States.

I. Nader Has Filed an Insufficient Number of Valid Nomination Papers.

6. On information and belief, Nader has filed an insufficient number of valid nomination papers to be on the general election ballot.

7. Representatives of the Challengers as of this date have made contact with 942 of the voters whose names appear on the 1,784 nominating papers purportedly signed by duly registered voters in Congressional District 2.¹ Challengers have reason to believe that at least 167 of the 942 (or 17.7 percent) of these nomination papers should be disqualified because they fall into one of the following categories of irregularities:

- The same name had been certified by the local election officials on another nomination paper for Nader;
- The same voter signed a nomination paper for both Nader and another candidate for president²;
- The voter was misled by the circulator of the nomination papers about the nature of the document presented to be signed;
- The purported signer does not live at the address written on the nomination paper;
- The signature on a nomination paper was forged.

8. Challengers' investigation is continuing. Challengers on Friday, September 10, 2004, received copies of 77 of the 85 voting registration cards they had requested in order to compare the signatures on those cards to the ones appearing on Nader nomination papers.³ Challengers' representatives diligently continue to attempt to contact the persons named on the remaining 842 nomination papers from Congressional District 2 as well as the persons whose names appear on Nader nomination papers from Congressional District 1.

¹ Challengers were only able to obtain copies of almost half of the Congressional District 2 nomination papers filed by the Nader campaign ten days ago. Challengers were only able to obtain copies of half of the Congressional District 1 nomination papers six days ago.

² Pursuant to RSA 655:40, "No voter shall sign more than one nomination paper for each office to be voted for..."; see also, RSA 659:17(1) (ballot with votes for more than the stated number of candidates for a particular office will not be counted for that office)

³ Challengers have been advised that the other voter registration cards they requested no longer exist.

9. Given their statutorily limited role in the nominating petition process, most City Clerks and Town Supervisors of the Checklist only check nomination papers to see if the name on the nomination paper matches up with the name on the local voter registration list.⁴ Few, if any, local election officials check to see if the signature on the nomination paper is the same as the signature on the voter's voter registration card. Thus, the only safeguard for preventing forged Nader nomination papers from being accepted by the State of New Hampshire is the work done on behalf of the Challengers. Local election officials also do not, nor would one reasonably expect them to, make any inquiry as to whether a voter was deceived into signing a nomination paper. Moreover, local election officials do not necessarily know whether a person whose name appears on the nomination paper has moved out of the voting precinct.

10. Based on the review of Nader nomination papers by Challengers' representatives, the challengers do not believe Nader has filed a sufficient number of valid nomination papers to qualify for New Hampshire's general election ballot and will present the evidence to establish his failure at the hearing on this matter.

II. Dishonesty in the Collection of Nomination Papers for Nader Disqualifies Nader from the New Hampshire Ballot.

11. The Nader nominating paper circulation process is tainted by misrepresentation, forgery, and dishonesty.

⁴ That necessarily cursory check eliminated many of Nader's petitions. More than one-third of the nomination papers submitted by the Nader campaign to local election officials failed to contain the name of a voter whose name even appeared on the city's or town's voter registration list. Representatives of the Nader campaign have stated that they submitted approximately 5,800 number of nomination papers. Concord Monitor, August 12, 2004, "Naderites defend momentum." Only 3,826 were certified by local elections officials as containing the name of a registered voter and filed with the Secretary of State.

12. Numerous New Hampshire voting citizens living throughout the State of New Hampshire had their signatures forged on nomination papers for Nader, including Challenger Brian Farias. *See* Affidavit of Brian Farias, attached hereto as Exhibit A.

13. Circulators of nomination papers for Nader intentionally and systematically engaged in the practice of making false statements about the nature of the documents they were asking New Hampshire voters to sign. For example, Challenger Hazel R. Tremblay was falsely led to believe she was signing a petition to do away with the requirement that undeclared voters must re-register after voting in a primary to retain their unaffiliated status. *See* Affidavit of Hazel R. Tremblay, attached hereto as Exhibit B. Challenger Dorie M. Grizzard was asked to sign a petition to "help" the Democratic Party. *See* Affidavit of Dorie M. Grizzard, attached hereto as Exhibit C.

14. Dozens of registered voters whose nomination papers have been filed by the Nader campaign have already told the Challengers they did not know they were signing nomination papers for Nader, stating, for example, that the nomination papers they were asked to sign were for the "Independent Party" or that they were for an "independent candidate" without mention of Nader's name. Carol D. Merrow of Nashua, for example, was told that the paper she was signing "was to put the Independent Party on the ballot for Primary voting." *See* Affidavit of Carol D. Merrow, attached hereto as Exhibit D.

15. Moreover, more than one circulator of Nader nomination papers presented the papers to voters in such a way as to cover the top one-third of the form, thus hiding Nader's name. *See* Exhibits B and C.

16. Nader should be held accountable for the dishonesty in the collection of his nomination papers and should be disqualified from appearing on the New Hampshire general

election ballot. See Nelson v. Morse, 91 NH 177, 178 (1940) (“The Commissioners ruled that signatures to the nomination papers obtained by the dishonesty of the petitioners or their agents were not to be counted in making the necessary number. This ruling was correct. The principle that fraud vitiates whatever is done under its influence, inheres in the statute, and fraud lies in silence or concealment which constitutes dishonesty as well as in actual misrepresentations.”).

III. The Unlawful Assertion on the Nader Nomination Papers that Nader Is a Candidate of the Fictitious “Independent Party” Disqualifies Nader from the New Hampshire Ballot.

17. RSA 655:40 mandates that all nomination papers submitted for a candidate who seeks to have his or her name placed on the ballot for the New Hampshire general election, “...shall contain the name and domicile of the candidate, the office for which the candidate is nominated and **the political organization or principles the candidate represents.**” (emphasis added). Contrary to this clear directive, the Nader nomination papers not only fail to meet the statutory mandate, but are also misleading, and falsely represent that Nader is a candidate of the “Independent Party,” a “party” that does not exist in the State of New Hampshire.

18. No political party can be placed on the ballot in New Hampshire unless said party has previously satisfied the statutory requirements established either in RSA 652:11 or RSA 655:40-a; RSA 655:40-b; and RSA 655:42. Nader’s nomination papers, however, expressly assert that he is “a candidate of the Independent Party.” A true and accurate exemplar of Nader’s nomination papers is attached as Exhibit E. There is no “Independent Party” recognized under the State of New Hampshire election laws.

19. Moreover, there is no “political organization” known as the Independent Party that exists in New Hampshire. In contrast, there are other active political groups in New

Hampshire, such as the “New Hampshire Green Party,”⁵ the “Libertarian Party of New Hampshire,”⁶ and the “New Hampshire Constitution Party.”⁷

20. On information and belief, there is no national political organization known as the Independent Party, again contrasted with the Green Party, Libertarian Party, and Constitution Party.

21. Asserting on his nomination papers that Nader is a “candidate of the Independent Party” misleads the voter who is asked to sign those papers.

22. New Hampshire has a statutory process that enables a candidate to appear on the New Hampshire ballot under the banner of a political organization that does not meet the RSA 652:11 requirements for a party. See RSA 655:40-a, RSA 655:40-b, and RSA 655:42, III. If Nader wished to be on the New Hampshire ballot as the candidate of the Independent Party, Nader could have pursued this option. Nader chose not to do so.

23. If Nader is permitted to have his name listed on the general election ballot as a candidate of the “Independent Party,” he will have been allowed to open a new back door for a candidate or a party to circumvent the New Hampshire statutory limitations on the recognition of political parties established by RSA 652:11 and the requirements for a political organization to get on the ballot as set forth in RSA 655:40-a, RSA 655:40-b, and RSA 655:42, III, simply by placing whatever political party name they wish on the candidate’s nomination papers. This precedent would allow *any* candidate to list *any* party he or she wishes on their nomination

⁵ See the New Hampshire Green Party’s website, www.nhgreens.org, which contains its bylaws and other information about its activities in New Hampshire.

⁶ See the Libertarian Party of New Hampshire’s website, www.lpnh.org, which contains its statement of principles, officers and other information about its activities in New Hampshire.

⁷ See the New Hampshire Constitution Party’s website, www.nhconstitutionparty.org, which contains its bylaws, officers and other information about its activities in New Hampshire.

papers and thereby circumvent the limitations imposed by the New Hampshire legislature on official recognition of political parties.

24. At this time, it appears that Nader is not affiliated with a political party.⁸

Accordingly, he should have listed on his nomination papers the fact that he was unaffiliated or undeclared⁹ and he should have identified the principles he represents, as required by New Hampshire law.

25. Because Nader failed to accurately reflect his status on his nomination papers, he is ineligible to have his name on the New Hampshire ballot.

IV. The Failure of Nader To Include the Name of His Designated Vice-Presidential Running Mate on His Nomination Papers or File Nomination Papers on Her Behalf Disqualifies Nader From Appearing On The New Hampshire Ballot.

26. RSA 655:42, I, expressly requires a person seeking to be on the New Hampshire ballot as a candidate for vice president through the nomination paper process to file valid nomination papers with the Secretary of State. "It shall require the names of 3,000 registered voters, 1,500 from each United States congressional district in the state, to nominate by nomination papers a candidate for president, vice-president, United States senator, or governor."

Id.

27. Nader's designated vice-presidential running mate, Jan Pierce ("Pierce") did not file her own nomination papers with the Secretary of State, nor did Nader's nomination papers

⁸ Nader sought and failed to win the nomination of the national Green Party and sought and accepted the nomination of the national Reform Party. He is expected to be on the ballot as the Reform Party nominee for president in seven states. See August 29, 2004, Washington Post article, "Reform Party Reaffirms Nader Is Nominee," attached hereto as Exhibit F. This anomaly could sow additional confusion among voters and further upset the statutory scheme noted above.

⁹ In New Hampshire, voters who do not wish to be registered as members of parties recognized under RSA 652:11, are "undeclared" voters, not independent voters. RSA 652:16-a.

list Pierce as his running mate. *See* Exhibits G and E. Thus, Pierce has failed to qualify as a candidate in New Hampshire.

28. Nader's attempt to be placed on the New Hampshire ballot will engender even further confusion among New Hampshire voters because he has actually designated a *different* vice presidential candidate in other states. In those states in which Nader will appear on the ballot as the official nominee of the Reform Party, his vice-presidential running mate will be listed as Peter Camejo ("Camejo"). *See* Exhibit F. In several other states where Mr. Nader is seeking to be on the ballot through a state's nominating process, Camejo is again his designated running mate.¹⁰

29. Thus, this Commission must also review the further confusion that would be created if Nader's name is allowed to be placed on the ballot in New Hampshire with *no* vice-presidential candidate, or if the vice-presidential candidate in New Hampshire is a different person than the vice presidential candidate whom Nader has identified in other states.

30. New Hampshire's election laws clearly contemplate that a candidate for president can only appear on the New Hampshire ballot with a vice-presidential running mate. RSA 656:4 ("the names of a party's candidates for president and vice-president shall be printed thereon under the designation for 'President and Vice-President of the United States.'"); and RSA 656:8 ("Directly at the right of the name of each candidate there shall be a square; except that, in the case of president and vice-president of the United States, one square shall suffice which shall be placed opposite the designation 'President and Vice-President of the United States.'")

¹⁰ See the June 22, 2004 Washington Times article, "Nader picks Camejo as running mate," attached hereto as Exhibit H, and a September 4, 2004 Fairbanks Daily News-Miner article, attached hereto as Exhibit I; *see also*, Nader's official campaign website, www.votenader.org, which contains his official campaign logo: NADER/CAMEJO2004.

31. Moreover, Nader's nomination papers fail to mention who is his vice-presidential running mate. *See* Exhibit E. New Hampshire's election laws contemplate that a candidate for president seeking to be on the ballot via the nomination paper process will state the name of "his vice presidential candidate" on his nomination papers. RSA 655:19-a ("a single fee of \$250 for himself and his vice presidential candidate"). Compare Nader's nomination papers, attached hereto as Exhibit E, with those of the "Libertarian Party Organization" candidate for president, Michael Badnarik ("Badnarik"), which list Badnarik's vice-presidential running mate, Richard Campagna, attached hereto as Exhibit J.

32. Because New Hampshire's election laws do not allow Nader to run as a solo candidate for President and no nomination papers were filed for his designated running mate, Nader's name cannot appear on the general election ballot.

WHEREFORE, Challengers Kathleen N. Sullivan, Hazel R. Tremblay, Dorie M. Grizzard, and Brian Farias respectfully request that the Ballot Law Commission:

- A. Hold a hearing on this Objection on September 24, 2004 pursuant to RSA 665:5;
- B. Disqualify Ralph Nader from appearing on the New Hampshire general election ballot as a candidate for president of the United States; and
- C. Grant such further relief as is just and proper.

Respectfully submitted,

KATHLEEN N. SULLIVAN, HAZEL R. TREMBLAY, DORIE M. GRIZZARD and BRIAN FARIAS.

By their Attorneys,

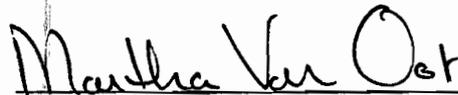


Martha Van Oot
Emily R. Rice
ORR & RENO, P.A.
One Eagle Square
P.O. Box 3550
Concord, NH 03301
(603) 224-2381

Dated: September 13, 2004

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Challenge has been forwarded, by first class mail, to Aaron Rizzio, New Hampshire representative for the Nader for President Campaign, and to the Nader for President 2004 General Election Committee.



Martha Van Oot

Dated: September 13, 2004

373356_1.DOC

EXHIBIT A

My name is Brian Farias I live at
65 Dickinson Road, Keene NH 03431

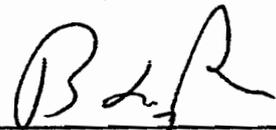
I have reviewed the attached nominating petition that appears to have my signature on it.

I did not sign this petition and this is not my signature.

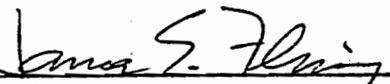
I declare under penalty of perjury that the above is true and correct.

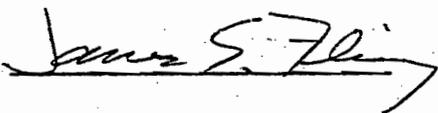
Date signed: 9-12-04

Name: Brian Farias

Signature: 

Witness

Name: 
James E Flaherty

Signature: 



STATE OF NEW HAMPSHIRE

Nomination Paper
(For State General Election)

RSA 655:40 - 45)

The subscriber, a registered voter in the State of New Hampshire, hereby makes the following nomination to be voted for at the state general election to be held on November 2, 2004, and requests that the name of said candidate be placed upon the official ballot to be used in said election as a candidate of the

Independent Party.

Candidate's Name Ralph Nader

Candidate's Domicile 53 Hillside Ave. Winsted, CT 06098

For the Office of President of the United States

District No.

RSA 655:45

No person shall falsely make or file or knowingly deface or destroy any nomination paper, or any part thereof, or sign any nomination paper contrary to the provisions of law knowing the same, or any part thereof, to be falsely made or suppress any nomination paper, or any part thereof, which has been duly filed. Whoever knowingly violates any of the provisions of this section shall be guilty of a misdemeanor if a natural person or be guilty of a felony if any other person.

Voter's Signature [Signature] Print Name [Print Name]
Voter's Domicile [Address] [Town/City] [Ward]

Voter's Mailing Address [Street Address] [Town/City] [Zip Code]

CERTIFICATE OF SUPERVISORS OF THE CHECKLIST

The undersigned, a majority of the Supervisors of the Checklist (or Registrars of Voters), hereby certify that the voter signing this nomination paper is a registered voter in the town/ward of

[Signature]

Date signed 8-19-04

RSA 655:41, II. The city clerk may certify that the signer is a registered voter, if in a city.

Filing Deadlines:
August 11, 2004 - Last day to submit signed nomination papers to Supervisors of the Checklist in each town or city
September 1, 2004 5:00 p.m. - Supervisors must have nomination papers certified for candidates and organizations.
September 8, 2004 5:00 p.m. - Last day to file certified nomination papers with Secretary of State's Office

Mail to: Ralph Nader, c/o Aaron Rizzio, PO Box 145, West Peterborough, NH 03468

EXHIBIT B

Affidavit of Hazel R. Tremblay

I, Hazel R. Tremblay, being duly sworn, make the following statement:

1. I live at 21 Bradley Street, Apt. 4, Manchester, New Hampshire, and I am a registered voter in Manchester, Ward 9.
2. I am not registered as either a Democrat or a Republican and I consider myself an Independent voter.
3. I sometimes vote in primaries, and when I do, I go through the process of re-registering as an Independent.
4. One day this summer when I went grocery shopping at the Shaw's on South Willow Street, a man stopped me and asked me if I would sign something for Independents.
5. I asked the man if this was about Independents having to re-register at the polls.
6. He said to me, "Yes. Yes, it is."
7. Because it would be easier for me if I didn't have to re-register when I vote in a primary, I agreed to sign it.
8. I assumed he was telling me the truth.
9. I am disabled and walk with a cane, and was walking with a cane that day at Shaw's and the young man kept the paper in his hands on a clipboard while I signed it.
10. I didn't read the paper carefully, but I looked at it and I don't recall seeing Ralph Nader's name on it. If I had seen Ralph Nader's name on it, I would not have signed it.
HP The clipboard had numerous papers with signature on top rolled over, this I did not see the top of the form I was signing!
11. If the man had told me it was for Ralph Nader, I would have said, "No, thank you, I'm not interested." When I asked him if this was about Independents having to re-register at the polls, the man should have told me that it was for Ralph Nader.
12. I am very upset about this. I think this was a fraud.

Hazel R. Tremblay
Hazel R. Tremblay

State of New Hampshire
County of Hillsborough, SS

The above-named Hazel R. Tremblay personally appeared before on September 11, 2004 and swore that the above statement is true to the best of her knowledge and belief.

Judy E. Beaman
Justice of the Peace



STATE OF NEW HAMPSHIRE
 Nomination Paper
 (For State General Election)

RSA 655:40 - 45)

The subscriber, a registered voter in the State of New Hampshire, hereby makes the following nomination to be voted for at the state general election to be held on November 2, 2004, and requests that the name of said candidate be placed upon the official ballot to be used in said election as a candidate of the

Independent Party.

Candidate's Name Ralph Nader

Candidate's Domicile 53 Hillside Ave. Winsted, CT 06098

For the Office of President of the United States

District No.

RSA 655:45

No person shall falsely make or file or knowingly deface or destroy any nomination paper, or any part thereof, or sign any nomination paper contrary to the provisions of law knowing the same, or any part thereof, to be falsely made or suppress any nomination paper, or any part thereof, which has been duly filed. Whoever knowingly violates any of the provisions of this section shall be guilty of a misdemeanor if a natural person or be guilty of a felony if any other person.

Voter's Signature Hazel R. Tremblay Print Name HAZEL R. TREMBLAY

Voter's Domicile 21 BRADLEY ST Apt 4 Manchester 9
(street address) (town or city) (ward)

Voter's Mailing Address 21 Bradley St Apt 4 Manchester 03103
(street address) (town or city) (zip code)

CERTIFICATE OF SUPERVISORS OF THE CHECKLIST

The undersigned, a majority of the *Supervisors of the Checklist* (or Registrars of Voters), hereby certify that the voter signing this nomination paper is a registered voter in the town/ward of 9

Margaret M. Ellis
Barbara E. Arnold
Jane D. [unclear]
[unclear]

Date signed 8/13/04

Les R. Bernier

RSA 655:41, II. The city clerk may certify that the signer is a registered voter, if in a city.

Filing Deadlines:

- August 11, 2004 - Last day to submit signed nomination papers to Supervisors of the Checklist in each town or city
- September 1, 2004 5:00 p.m. - Supervisors must have nomination papers certified for candidates and organizations
- September 8, 2004 5:00 p.m. - Last day to file certified nomination papers with Secretary of State's Office

Mail to: Ralph Nader, c/o Aaron Rizzio, PO Box 145, West Peterborough, NH 03468

EXHIBIT C

My name is Dorie Grizzard. I live at
23A Balcom St, Nashua, NH 03060

_____ and I am the voter who signed the attached nominating petition
with my name on it.

These are the circumstances under which I signed the attached petition:

One day This summer, when I was shopping at
Shaw's on main street, I was approached by a
man collecting signatures. He asked if I was a
Democrat and said That signing This petition would
help The Democrats, He had The petitions on a
Clipboard and he folded a paper over The top of
The petition. He asked me to sign The bottom
to help The Democrats and I did. At no time
did he mention Ralph Nader. I would not have
signed it if I knew it was for Ralph Nader
because he will hurt John Kerry, who I support.

I declare under penalty of perjury that the above is true and correct.

Date signed: 9-12-04

Name: DORIE M GRIZZARD

Signature: Dorie M Grizzard

Witness

Name: Quentin Palfrey

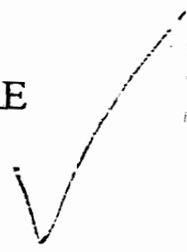
Signature: Quentin Palfrey



595-1591

STATE OF NEW HAMPSHIRE
Nomination Paper
(For State General Election)

RSA 655:40 - 45



The subscriber, a registered voter in the State of New Hampshire, hereby makes the following nomination to be voted for at the state general election to be held on November 2, 2004, and requests that the name of said candidate be placed upon the official ballot to be used in said election as a candidate of the Independent Party.

Candidate's Name Ralph Nader

Candidate's Domicile 53 Hillside Ave. Winsted, CT 06098

For the Office of President of the United States

District No.

RSA 655:45

No person shall falsely make or file or knowingly deface or destroy any nomination paper, or any part thereof, or sign any nomination paper contrary to the provisions of law knowing the same, or any part thereof, to be falsely made or suppress any nomination paper, or any part thereof, which has been duly filed. Whoever knowingly violates any of the provisions of this section shall be guilty of a misdemeanor if a natural person or be guilty of a felony if any other person.

Voter's Signature Dorie M Fitzgerald Print Name DORIE M FITZGERALD

Voter's Domicile 23 A Balcom St Nashua 07060
(street address) (town or city) (ward)

Voter's Mailing Address Same Nashua 03066
(street address) (town or city) (zip code)

CERTIFICATE OF SUPERVISORS OF THE CHECKLIST

The undersigned, a majority of the *Supervisors of the Checklist* (or Registrars of Voters), hereby certify that the voter signing this nomination paper is a registered voter in the town/ward of Nashua

Paul B Bergeron

Date signed 8/24/04

RSA 655:41, II. The city clerk may certify that the signer is a registered voter, if in a city.

Filing Deadlines:

- August 11, 2004 - Last day to submit signed nomination papers to Supervisors of the Checklist in each town or city
- September 1, 2004 5:00 p.m. - Supervisors must have nomination papers certified for candidates and organizations
- September 8, 2004 5:00 p.m. - Last day to file certified nomination papers with Secretary of State's Office

Mail to: Ralph Nader, c/o Aaron Rizzio, PO Box 145, West Peterborough, NH 03468

EXHIBIT D

My name is Carol D Merrow. I live at
91 1/2 W. Hallis St Nashua NH 03060

_____ and I am the voter who signed the attached nominating petition
with my name on it.

These are the circumstances under which I signed the attached petition:

was told to me that it was to put the Independent
Party on the ballot for Primary voting, which I
firmly approve of. They did not, however, tell
me that by signing this I would endorse
Ralph Nader. I DO NOT!

I declare under penalty of perjury that the above is true and correct.

Date signed: 8-31-04

Name: Carol D Merrow

Signature: Carol D Merrow

Witness
Name: Quentin Palfrey

Signature: Quentin Palfrey



STATE OF NEW HAMPSHIRE

Nomination Paper
(For State General Election)

RSA 655:40 - 45)

The subscriber, a registered voter in the State of New Hampshire, hereby makes the following nomination to be voted for at the state general election to be held on November 2, 2004, and requests that the name of said candidate be placed upon the official ballot to be used in said election as a candidate of the Independent Party.

Candidate's Name Ralph Nader

Candidate's Domicile 53 Hillside Ave. Winsted, CT 06098

For the Office of President of the United States

District No.

RSA 655:45

No person shall falsely make or file or knowingly deface or destroy any nomination paper, or any part thereof, or sign any nomination paper contrary to the provisions of law knowing the same, or any part thereof, to be falsely made or suppress any nomination paper, or any part thereof, which has been duly filed. Whoever knowingly violates any of the provisions of this section shall be guilty of a misdemeanor if a natural person or be guilty of a felony if any other person.

Voter's Signature [Handwritten Signature] Print Name CAROL D MERROW

Voter's Domicile 91 1/2 W Hollis St Nashua (street address) (town or city) (ward)

Voter's Mailing Address SAME (street address) (town or city) 03060 (zip code)

CERTIFICATE OF SUPERVISORS OF THE CHECKLIST

The undersigned, a majority of the Supervisors of the Checklist (or Registrars of Voters), hereby certify that the voter signing this nomination paper is a registered voter in the town/ward of Nashua

[Handwritten Signature: Paul H. Bergeron]

Date signed 8/24/04

RSA 655:41, II. The city clerk may certify that the signer is a registered voter, if in a city.

Filing Deadlines:
August 11, 2004 - Last day to submit signed nomination papers to Supervisors of the Checklist in each town or city
September 1, 2004 5:00 p.m. - Supervisors must have nomination papers certified for candidates and organizations
September 8, 2004 5:00 p.m. - Last day to file certified nomination papers with Secretary of State's Office

Mail to: Ralph Nader, c/o Aaron Rizzio, PO Box 145, West Peterborough, NH 03468

EXHIBIT E



STATE OF NEW HAMPSHIRE

Nomination Paper (For State General Election)

RSA 655:40 - 45)

The subscriber, a registered voter in the State of New Hampshire, hereby makes the following nomination to be voted for at the state general election to be held on November 2, 2004, and requests that the name of said candidate be placed upon the official ballot to be used in said election as a candidate of the

Independent Party.

Candidate's Name Ralph Nader

Candidate's Domicile 53 Hillside Ave. Winsted, CT 06098

For the Office of President of the United States

District No.

RSA 655:45

No person shall falsely make or file or knowingly deface or destroy any nomination paper, or any part thereof, or sign any nomination paper contrary to the provisions of law knowing the same, or any part thereof, to be falsely made or suppress any nomination paper, or any part thereof, which has been duly filed. Whoever knowingly violates any of the provisions of this section shall be guilty of a misdemeanor if a natural person or be guilty of a felony if any other person.

Voter's Signature Bertha L Seeger Print Name Bertha L Seeger

Voter's Domicile 8 Metropolitan Washua NH 3 030604
(street address) (town or city) (ward)

Voter's Mailing Address _____
(street address) (town or city) (zip code)

CERTIFICATE OF SUPERVISORS OF THE CHECKLIST

The undersigned, a majority of the *Supervisors of the Checklist* (or Registrars of Voters), hereby certify that the voter signing this nomination paper is a registered voter in the town/ward of _____

Date signed _____

RSA 655:41, II. The city clerk may certify that the signer is a registered voter, if in a city.

Filing Deadlines:

- August 11, 2004 - Last day to submit signed nomination papers to Supervisors of the Checklist in each town or city
- September 1, 2004 5:00 p.m. - Supervisors must have nomination papers certified for candidates and organizations
- September 8, 2004 5:00 p.m. - Last day to file certified nomination papers with Secretary of State's Office

Mail to: Ralph Nader, c/o Aaron Rizzio, PO Box 145, West Peterborough, NH 03468

Exhibit F

washingtonpost.com

Reform Party Reaffirms Nader Is Nominee

Some Question Alliance as Marriage of Convenience, Group's Political Viability

By Jonathan Finer
Washington Post Staff Writer
Sunday, August 29, 2004; Page A05

At a hastily arranged convention in an Irving, Tex., hotel, Ralph Nader yesterday accepted the Reform Party's nomination for president, and the ballot lines in seven states, including Florida and Michigan, that come with it.

The event is something of a formality. Nader was nominated by national chairman Shawn O'Hara in a telephone conference call in May and is only being reaffirmed to satisfy a Florida election law that requires nominees to be selected in person.

"This is just to prevent any more court litigation with our brothers and sisters in the Democratic Party," O'Hara said, alluding to legal squabbles in several states where Democrats fear Nader will siphon votes from their nominee, Sen. John F. Kerry (Mass.).

To many longtime Nader backers, the alliance with a party that has struggled since the withdrawal from public life of its founder, Texas billionaire H. Ross Perot, is an unlikely, and some say unfortunate, marriage of convenience.

In its heyday, the Reform Party had ballot lines in every state except New York, according to O'Hara. But while Perot won more than 8 million votes as its nominee in 1996, membership is now about 1 million, he said.

The party nearly dissolved after splitting into two factions during the 2000 campaign and nominating separate candidates: conservative commentator Patrick J. Buchanan and physicist John Hagelin.

A court recently ordered the party to repay the Federal Election Commission \$333,558 owed from the 2000 election. According to an Aug. 11 report filed with the FEC by its then-Treasurer William Chapman Sr. -- who asked the regulators to terminate the party's national status -- the Reform Party had \$18.18 in its coffers.

"It shows how desperate Nader is, to have to join up with these people. He basically has nothing in common with them, aside from an anti-corporate leaning and a desire to rehabilitate his image," said Cal Jilson, a political science professor at Southern Methodist University in Texas who has written extensively on third parties. "And when a party nominates Buchanan one election and Nader the next, it shows there's no *there* there."

Nader spokesman Kevin B. Zeese sees it differently. "It's actually surprising how much Ralph and the Reform Party agree on," he said, citing electoral reform, ending corporate welfare, and opposition to the Iraq war as examples.

Zeese acknowledges disagreements on some topics, such as immigration and health care. "But remember, they're endorsing us," he said. "We're not endorsing them."

Throughout the 2004 campaign, Nader -- who ran on the Green Party ticket in 1996 and 2000 but was denied

that party's endorsement this year -- has drawn criticism for seeking or accepting help from those of all political stripes.

Republicans, who think Nader's presence in the race helps President Bush, have gathered signatures for his petitions to get on the ballot in states such as Michigan, where officials refused to recognize his Reform Party endorsement. Nader is suing to reverse that decision.

He won the backing of the Independent Party of Delaware. He is said to be wooing the Natural Law Party in California, where he previously sought the nomination of Peace and Freedom Party, which instead chose activist Leonard Peltier, who is serving a life sentence for murder. In West Virginia, Nader's overtures were turned down by the progressive Mountain Party.

But in the Reform Party and its leader, Nader found a willing partner.

O'Hara, who recently moved the party's headquarters to his hometown of Hattiesburg, Miss., said in an interview that he courted Nader to top the ticket.

A wealthy perennial candidate, O'Hara has run unsuccessfully for various offices as a Democrat, Republican, Reform Party member and Independent. He once ran for governor against his father. During a 2002 campaign, O'Hara argued for the dissolution of the FBI, the CIA and the U.S. Department of Education to the Hattiesburg American newspaper. He also assisted with the legal defense of Sam Bowers, a former Ku Klux Klan leader convicted in 1998 of ordering the murder a civil rights worker in the 1960s.

In an interview in which he stressed that he was speaking for himself and not his party, O'Hara, who is running for Congress this year, said he favors a constitutional amendment banning abortion, and that "anyone who violates it should get the death penalty."

"The party is basically now a vehicle for people on the fringe like O'Hara, and I guess, Nader, to pursue their personal ambitions," said L. Sandy Maisel, a professor at Maine's Colby College who studies third parties.

Zeese decline to comment on O'Hara, except to say: "Look at [Democratic National Committee Chairman] Terry McAuliffe and his corporate ties. I am sure he has more skeletons."

O'Hara said the party will focus on Florida, which has a Sept. 1 deadline for filing papers on Nader's behalf, and where Nader received more than 97,000 votes in the 2000 race. The Ballot Project Inc., a group of attorneys working to keep Nader off the ballot in numerous states, is considering asking the FEC to rule that the Reform Party is no longer a national party and should not be able to place Nader on the Nov. 2 ballot.

But according to O'Hara, the party is on the rebound and is circulating petitions that will allow it to gain ballot lines in Rhode Island and four other states he would not name.

"Keep in mind, 80 out of 100 people did not vote for a Democrat or a Republican in the [primaries], so that is who we are appealing to," O'Hara said. He added that the first batch of signs listing Nader and running mate Peter Miguel Camejo above the Reform Party name were to be distributed to Florida last week.

EXHIBIT G



New Hampshire

*Department of State
State House, Room 204
Concord, N.H. 03301*

www.sos.nh.gov

This office has received your declaration of intent to be a candidate for President of the United States in the general election to be held on November 2, 2004. When the required nomination papers are filed, your name will appear on the general election ballot as follows:

**Ralph Nader
Jan Pierce**

As you know, the required number of nomination papers to be filed is 3,000 (1,500 from each congressional district). Below, the dates that these nomination papers must be filed are listed.

If you have any questions, please do not hesitate to contact us at 1-800-562-4300.

Sincerely,

**Karen H. Ladd
Assistant Secretary of State**

June 11, 2004

Filing Deadlines:

August 11, 2004 - Last day to submit signed nomination papers to Supervisors of the Checklist in each town or city

September 1, 2004 5:00 p.m. - Supervisors must have nomination papers certified for candidates and organizations

September 8, 2004 5:00 p.m. - Last day to file certified nomination papers with the Secretary of State's Office (must be grouped by municipalities)

4/27/04



NEW HAMPSHIRE GENERAL ELECTION

Declaration of Intent
For PRESIDENTIAL and
VICE-PRESIDENTIAL CANDIDATES
(RSA 655:17-b)

I, Jan Pierce
(print legal name)

declare that I am domiciled in the City (or Town of Unincorporated place) of _____
County of Noble, State of Ohio

and am a qualified voter therein; that I intend to be a candidate for the office of
VICE-PRESIDENT

to be chosen at the general election to be held on the 2nd day of November, 2004; and I intend to file
nomination papers by the deadline established under RSA 655:43. I further declare that, if qualified as a
candidate for said office, I shall not withdraw; and that, if elected, I shall be qualified for and shall assume the
duties of said office.

Candidate's signature:
Jan Pierce

Mailing Address:
57424 St Johns Rd
Quaker City, Ohio 43773

State of Ohio
County of Quincy ss 2-26- 2004

The above-named Jan Pierce personally known to me appeared and made
oath that the above declaration by him subscribed is true.

Before me,
Paula K. Winland
Justice of the Peace/Notary Public



Paula K. Winland
Notary Public
In and for the State of Ohio
My Commission Expires
February 26, 2008

Fee: \$250.

Exhibit H

Nader picks Camejo as running mate

By Brian DeBose

THE WASHINGTON TIMES

Published June 22, 2004

Independent presidential candidate Ralph Nader selected California investment banker Peter Miguel Camejo as his running mate in the November election.

Mr. Camejo, 64, was a leading candidate for the Green Party in California's special recall election, which removed Gov. Gray Davis and replaced him with Arnold Schwarzenegger last year. Mr. Nader said the move solidifies his campaign and its efforts to transform government.

"He adds far more to my ticket than any candidate the other parties can produce," Mr. Nader said.

The most important issue in the election, Mr. Camejo said, is the Iraq war, which he calls unsound international policy.

A first-generation American, Mr. Camejo was born in New York to Venezuelan parents. He said he will be active in the campaign, speaking to Hispanics and blacks.

Plans include speaking on Spanish-language television and radio stations across the country.

"We will engage the Latino community in a way that has never been done before by any campaign," Mr. Nader said.

The civil rights background of Mr. Camejo will fit nicely into the campaign, Mr. Nader said. Mr. Camejo marched with Martin Luther King in Selma, Ala., in the 1960s.

Pundits are viewing Mr. Camejo's selection as a vice-presidential candidate as a way to guarantee Mr. Nader receives the Green Party endorsement.

"This is a strong step forward for him to getting a nomination from the Green Party," said Chris Kofinis, a strategist for TheNaderFactor.com, an organization devoted to building a unified front to remove President Bush from office.

Mr. Kofinis said his group is not trying to persuade Mr. Nader to drop out of the race, but it is worried that Mr. Nader's influence could spoil a close election for Sen. John Kerry of Massachusetts, the presumptive Democratic nominee.

"It is now crystal clear to Democrats and Republicans that Nader will be a factor in this election cycle," Mr. Kofinis said.

Mr. Camejo, board chairman of Progressive Asset Management of California, which he founded in 1987, said he will attend the Green Party convention in Milwaukee this week and campaign on the Nader platform.

Exhibit I

Fairbanks Daily News-Miner

Nader added to Alaska ballot as Populist candidate

By MATT VOLZ

Saturday, September 04, 2004 - Associated Press Writer

ANCHORAGE—Independent presidential candidate Ralph Nader has been added to the Alaska ballot.

Nader and running mate Peter Camejo were added Thursday as Populist Party candidates after supporters turned in enough valid signatures for the party to receive official recognition by the state.

Once the party was recognized as a limited party last weekend, its members were able to nominate the consumer advocate for president.

Nader needed 2,878 valid signatures. The state Division of Elections verified more than 3,000 signatures of the 5,000-6,000 that Nader's supporters turned in, according to election coordinator Naomi Nelson.

As a limited party, the Populist Party can only field presidential and vice presidential candidates. It will remain a limited party in Alaska if Nader receives more than 3 percent of the vote in November, Nelson said.

So far, Nader has met the requirements to appear on the ballot in nine of 18 states actively contested by President Bush and Kerry this year.

"To the credit of Alaska's Democrats, Nader's ballot access was not challenged in our state," said Steve Conn, the new party's chairman, in a statement. "In Alaska, a Nader vote will send a clear message to America on matters ignored by the major party candidates such as universal health care and the living wage."

In the 2000 election, Nader appeared on ballots in 43 states including Alaska, where he won just over 10 percent of the vote.

Other third-party presidential candidates on Alaska's ballot this year include David Cobb of the Green Party, Michael Peroutka of the Alaskan Independence Party and Michael Badnarik of the Alaska Libertarian Party.

EXHIBIT J

STATE OF NEW HAMPSHIRE

Nomination Paper (For State General Election) RSA 655:40-45



The subscriber, a legal voter in the State of New Hampshire, hereby makes the following nominations to be voted for at the state general election to be held on November 2, 2004 and requests that the names of said candidates be placed upon the official ballot to be used in said election as candidates of the Libertarian Party Organization.

Candidate's Name Richard B. Kahn
Candidate's Domicile 147 Robinson Road
Hudson, NH 03051
For the Office of United States Congress Dist. No. 2

Candidate's Name Kenneth E. Blevens Sr.
Candidate's Domicile 2 Valley Road
Bow, NH 03304
For the Office of United States Senator

Candidate's Name Michael Badnarik
Candidate's Domicile 14100 Thermal # 923
Austin, TX 78728
For the Office of President

Candidate's Name Richard Campagna
Candidate's Domicile 1135 Weeber Street
Iowa City, IA 52246
For the Office of Vice President

RSA 655:45

No person shall falsely make or file or knowingly deface or destroy any nomination paper, or any part thereof, or sign any nomination paper contrary to the provisions of law knowing the same, or any part thereof, to be falsely made or suppress any nomination paper, or any part thereof, which has been duly filed. Whoever knowingly violates any of the provisions of this section shall be guilty of a misdemeanor if a natural person or be guilty of a felony if any other person.

Voter's Signature Kristine S. Tardiff Print Name Kristine S. Tardiff
Voter's Domicile 41 Dunklee St Concord NH 7
Street address Town or City (Ward)
Voter's Mailing Address Same
Street address Town or City (Ward)

CERTIFICATE OF SUPERVISORS OF THE CHECKLIST

The undersigned, a majority of the Supervisors of the Checklist (or Registrars of Voters), hereby certify that the voter signing this nomination paper is a registered voter in the town/ward of Concord

Ward 7

James Bonenfant
City Clerk

Date signed 8/26/04