

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

ANDY GOTTLIEB, et al.,

Plaintiffs,

v.

NED LAMONT, et al.,

Defendants.

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Case No. 3:20-cv-623-JCH

June 2, 2020

**REPLY MEMORANDUM OF LAW IN SUPPORT OF
EMERGENCY MOTION FOR PRELIMINARY OR PERMANENT
INJUNCTIVE AND DECLARATORY RELIEF
AS TO FIRST CLAIM (BALLOT ACCESS)**

“We have indeed acknowledged an individual’s associational right to vote in a party primary without undue state-imposed impediment.” *N.Y. State Bd. of Elections v. Lopez Torres*, 552 U.S. 196, 204 (2008). “The State’s power cannot be used, for example, to create barriers that unduly burden a person’s right to participate in a state-mandated . . . primary.” *Yang v. Kosinski*, No. 20-1494-CV, 2020 WL 2820179, at *7 (2d Cir. June 1, 2020). “[V]oter-plaintiffs have an associational right to vote in political party elections,” *Price v. New York State Bd. of Elections*, 540 F.3d 101, 108 (2d Cir. 2008) (citing *Lopez-Torres & Kusper v. Pontikes*, 414 U.S. 51, 57-58 (1973)).

The State Defendants (Governor Lamont and Secretary of the State Merrill) and the Democratic State Central Committee mistakenly rely almost entirely on *Lopez-Torres*, 552 U.S. at 202, a case in which the plaintiffs “sought a declaration that New York’s convention system for selecting Supreme Court Justices violates their First Amendment rights, and an injunction mandating the establishment of a direct primary election to select party nominees for Supreme Court Justice.” *Id.*

But this case is different from *Lopez-Torres*. Here the State Defendants will hold a primary for state offices on August 11, 2020, but it is alleged that the barriers to ballot access for that primary, imposed by statute and executive order, unduly and unjustifiably burden voter-plaintiffs' First Amendment right to participate. States may or may not be required to hold a primary. But when they do, voter-plaintiffs argue that the primary must be held consistent with the First Amendment by not unjustifiably restricting participation. Plaintiffs here challenge no "internal party processes," as State Defendants and the Democratic State Central Committee seem to contend, but instead challenge a "public electoral function" of the State of Connecticut, quintessential state action. *Jacobson v. Kings Cty. Democratic Cty. Comm.*, 788 F. App'x 770, 774 (2d Cir. 2019) (rejecting claim based on allegedly illegal procedures of party convention). This case is therefore governed by the same well-settled *Anderson-Burdick* test that governed *Campbell v. Bysiewicz*, 213 F.Supp.2d 152 (D.Conn. July 23, 2002), a standard completely unaddressed by the State Defendants.

The State Defendants omit *Anderson-Burdick* from their brief, despite it being the prevailing First Amendment standard "for courts to utilize when faced with a First Amendment challenge to a state election law:"

A court considering a challenge to a state election law must weigh the character and magnitude of the asserted injury to the rights protected by the First and Fourteenth Amendments that the plaintiff seeks to vindicate against the precise interests put forward by the State as justifications for the burden imposed by its rule, taking into consideration the extent to which those interests make it necessary to burden the plaintiff's rights. . . .

The standards for review are clear. If the plaintiffs' rights are severely burdened, the statute is subject to strict scrutiny. If the burden is minor, but non-trivial, *Burdick's* balancing test is applied. . . . Nonetheless, . . . where the burden imposed by the law is non-trivial, we must weigh the State's justification against the burden imposed.

Price, 540 F.3d at 108-09 (citations omitted). The record in this case demonstrates that the state cannot justify the burdens imposed on voter-plaintiffs, especially given COVID-19.

A. Connecticut's Ballot Access Laws – Even as Modified by Governor Lamont's Executive Order – Impose Severe Burdens on Voters' Associational Rights

Even the State Defendants' evidence shows the severe burden of Connecticut's Ballot Access Laws on voter-plaintiffs. This year, a total of 192 districts will elect State Representatives, State Senators, and U.S. Representatives in Connecticut.¹ Only one district has a primary challenger that received a party endorsement, only six have a primary challenger that obtained 15% of the delegates at a convention, and only seven districts have a candidate even trying to access the ballot by petition. ECF No. 28-1 at 87 of 116 (Ex. C Tbl. 1). Thus, a total of 178 incumbent officeholders, or more than 92% of the State Representatives, State Senators, and U.S. Representatives in Connecticut, will face no primary challenger this year. Over 92% of the "orderly and fair elections" Connecticut purportedly seeks to protect on August 11, 2020 will likely be one-candidate elections where voters have no choice on the ballot.

State Defendants put forward evidence of only two people ever petitioning onto the ballot for a primary for the office of State Senate in Connecticut history, both in 2018 before COVID-19, and in neither did so against an incumbent. ECF No. 28-1 at 89-95 of 116. In 2016, not a single candidate in either party petitioned onto the ballot for a primary for the office of State Senate. *Id.* at 91 of 116. State Defendants' evidence from 2006-2014 fails to differentiate between primaries triggered by a 15% vote at convention or by petition, but the facts demonstrate the severe burden to access the ballot by petition or by party convention for the office of State Senate:

¹ This Court can take judicial notice of Connecticut's 151 House Districts, 36 Senate Districts, and 5 Congressional Districts.

**Connecticut State Senate
Major Party Primaries
by Petition or Convention
2006-2016**

Year	Democratic Party Primaries	Republican Party Primaries
2006	0/36 Districts	0/36 Districts
2008	3/36 Districts	1/36 Districts
2010	1/36 Districts	1/36 Districts
2012	3/36 Districts	0/36 Districts
2014	4/36 Districts	0/36 Districts
2016	3/36 Districts	0/36 Districts

ECF No. 28-1 at 89-91 of 116 (Ex. D. Tbl. 2). In 2020, the only three candidates petitioning for the ballot for a State Senate primary are Plaintiff Bartlett, the undersigned counsel, and Lee Samowitz Jr., Esq. in Bridgeport. *Id.* at 87 of 116, Ex. C. Tbl. 1.

The State Defendants present evidence of 16 candidates petitioning for primary ballot access for the office of State Representative in all of Connecticut since the passage of Public Act 03-241. *Id.* at 89-91 of 116. Given that 151 State Representatives are up for re-election every year, and the major parties potentially nominate over 300 candidates each year, this shows significant *lack* of ballot access in Connecticut. State Defendants put forth evidence that only three candidates have petitioned for primary ballot access for the office of Governor since 2004, and State Defendants fail to show evidence of even one candidate who has petitioned for access to the primary ballot for the office of U.S. Representative in Connecticut history. *Id.* Not one. This follows 47 years without any primary elections for the office of U.S. Representative leading up to *Bysiewicz v. Campbell*, a fact the district court found significant in concluding that the restrictions on ballot access were overly severe. 213 F.Supp.2d at 156.

Indeed, as Plaintiff Gottlieb says in his supplemental affidavit, he has voted in nearly every election in the Town of Guilford since he became eligible to vote at the age of 18, including party

primaries, as a registered Connecticut Democrat. Supplemental Declaration and Expert Report of Andy Gottlieb (Exhibit 1) at ¶¶ 7, 12. In none of these elections has Plaintiff Gottlieb ever had the opportunity to choose from more than one candidate for the offices of State Representative or State Senator in the party primary. *Id.* at ¶ 14. Not once. When Plaintiff Gottlieb attempted to access the ballot himself, he personally faced the severe burdens of Connecticut’s Ballot Access Laws. *Id.* at ¶¶ 2-4, 6. He collected signatures himself each and every day, and marshaled the support of many volunteers who volunteered hours of their time to help him. *Id.* But even with their tireless efforts, they fell short, because of the severe burden imposed by Connecticut’s Ballot Access Laws. *Id.*

All of this evidence demonstrates the severity of the burden on voter-plaintiffs even before COVID. With the onset of the pandemic, however, it is evident that Connecticut’s restrictions – even with the slight modifications made by Governor Lamont – are severely burdensome.

As the attached declarations demonstrate, Plaintiffs’ fears about petitioning in the time of coronavirus have come to fruition. The task of gathering signatures, as expected, has become significantly more difficult. *See* Supplemental Declaration of Jason Bartlett (Exhibit 2) at ¶¶ 4-11; Declaration of Sergio Rodriguez (Exhibit 3) at ¶¶ 6-10. Mr. Bromley says that he is “aware of testimony” that “individuals with experience circulating petitions can collect 8 to 10 signatures per hour.” ECF No. 28-1 at ¶ 57. This vague statement should be given little weight, even at the preliminary injunction stage. But assuming it is true, the ease with which individuals could gather signatures before COVID-19 only shows the difficulty that candidates face now. Campaigners hired or volunteering to go door-to-door are collecting dramatically fewer signatures than they were able to collect prior to the pandemic. Ex. 3 at ¶¶ 6-10. It is more difficult to hire individuals or find volunteers to go door-to-door in the first place. Ex. 2 at ¶¶ 10. Additional evidence of the

difficulty gathering petition signatures was presented to the state prior to the filing of its brief, on Thursday, May 28. *See* Declarations of Tawana Galberth and Renee Brown (Exhibits 4 & 5).

The State Defendants' only response to COVID's unique and extraordinary circumstances is that plaintiffs' contentions are "nothing more than speculation and conjecture." ECF No. 28-1 at ¶ 50. Not so. To begin, plaintiffs had significant experience gathering petition signatures that render their opinions about the feasibility of petition signature gathering reasonable and worthy of considerable weight. ECF No. 9-2 (Gottlieb Report), 9-3 (Bartlett Report). A plaintiff with common sense (let alone knowledge, training, and experience running campaigns) to know that a proposed plan of action will be burdensome, costly, or even dangerous to his or her health need not put him or herself (and others) at risk simply in order to prove that their opinions are not speculative.

We are living in a pandemic and the human risks at play here should not be taken lightly. It is obvious and known to everybody, including the State Defendants, that the deadly pandemic makes it more logistically difficult to engage in an intensive petition signature gathering drive. Simply labeling the concern "speculative" is an abdication of the responsibility to engage with a sensitive reality and fails to address plaintiffs' argument that the conditions of the pandemic seriously "chill" petition drives from occurring in the first place. ECF No. 9 at 8. Moreover, the State Defendants were given evidence of the difficulty faced by campaign workers collecting signatures, on Thursday, but still maintained in their brief yesterday that no efforts were being made. *See* Exs. 4-5 (produced to the State Defendants May 28, 2020).

The State Defendants' arguments about the ease of collecting signatures using new methods is, in fact, nothing more than conjecture. Mr. Bromley appears to have no experience running petition signature drives as a candidate or a campaign manager, but speculates that

candidates can now “quickly and easily” use new methods created by the Governor’s executive order to sign petitions electronically. ECF No. 28-1 at ¶ 51. Mr. Bromley provides no evidentiary foundation for this speculation. He says candidates should use party lists, but provides no evidence that candidates can “obtain . . . a list of . . . email addresses of . . . party members” as he postulates. *Id.* Mr. Bromley speaks of “emailing petition forms to friends, family and other personal contacts,” *id.* at ¶ 54, but omits the requirements for individuals to (1) print out the petitions, (2) sign them and provide sensitive information on them including date of birth, (3) scan them back into their computer system, and (4) email them back to the candidate, steps which he concedes would require “follow up,” *id.* at ¶ 48, and an added layer of verification.

Mr. Bromley is unrealistic. He omits that voters in a household must sign each petition separately on a separate piece of paper before scanning it back and emailing it to the candidate or else the signatures will not be counted. He omits that many voters lack printers or other electronic devices required for the new mechanisms. Ex. 3 at ¶ 11 (“[S]ome friends could not even print the petition form for signing.”); Ex. 4 at ¶¶ 27-33 (explaining that digital options impose barriers on low-income voters). Mr. Bromley’s idea that candidates “post[] [petitions] on . . . various social media pages,” ECF No. 28-1 at ¶ 51, fails to account for the various *off-line* tasks that are required of individuals who want to download the petition off of a social media page (if they somehow find it): print the petition out or use some unnamed software to sign it electronically, and then return the petition by email or by having the campaign individually come pick it up. Ex. 3 at ¶ 11. As Plaintiff Gottlieb points out, Mr. Bromley and the Democratic State Central Committee’s evidence contain factual errors and are misleading. Ex. 1 at ¶¶ 1-11.

Mr. Bromley never avers to have engaged in such an effort himself—but in fact, nobody has before this election. One individual who has tried is proposed Plaintiff Sergio Rodriguez. Ex.

3 at ¶ 11. Mr. Rodriguez has sent over 500 emails and has sent his petition to over 1,000 followers on Facebook. *Id.* Out of 500 emails, Mr. Rodriguez has obtained only 8 petition signatures, a response rate of under 2%. *Id.* From Facebook, he has only obtained 2 signatures, a response rate of under 1%. *Id.* Overall he has secured only 3.3% of the signatures he has gathered using online methods. *Id.* at ¶¶ 10-11. An experiment by an enthusiastic volunteer on the undersigned’s State Senate campaign, Ms. Antonia Oglesby, returned an even lower response rate for text messaging to obtain petition signatures—0.005% to even acknowledge receiving a text. *See* Declaration of Antonia Oglesby (Exhibit 6) at ¶¶ 1-7. Mr. Bartlett has also made efforts to gather signatures using online methods and social media, *see* <https://bartlett4senate.com/> (offering Democratic Party members of New Haven an online signature petition portal created by Plaintiff Bartlett’s campaign), but he still believes that an order must issue in order to make access to the ballot possible for the August 11, 2020 primary election. Ex. 2 at ¶¶ 11-12.

As the State Defendants concede, “electronic circulation and collection of signatures has not been common within the context of ballot access petitions prior to 2020.” Mem. at 28. The State goes on to give the example of a government-created website, my2020census.gov, to show that it isn’t a novel technique—but *that makes plaintiffs’ point*, because a government-created secure and trusted web portal for submitting signatures is one part of plaintiffs’ requested relief. ECF No. 9 at 3.

Mr. Bromley points to the petition signature gathering drive of a self-funded millionaire, David Stemerman, to make his point, ¶ 51, which refutes itself. If only millionaires can afford to run for office, Connecticut’s system can hardly be considered constitutionally sufficient. *See* Mark Pazniokas, *Stemerman pledges another \$10M to his self-funded campaign*, CONNECTICUT MIRROR

(Jun. 25, 2018), available at <https://ctmirror.org/2018/06/25/stemerman-pledges-another-10-million-self-funded-campaign/> (last accessed June 2, 2020).

Connecticut’s few party primaries show that the requirements for accessing the ballot in this state are severely burdensome. More than 90% of officeholders face no primary year after year and many voters, such as Plaintiff Gottlieb, Ex. 1 at ¶¶ 12-13, never see any primaries for important state offices. This is strong evidence that Connecticut’s Ballot Access Laws “unduly ‘limit the field of candidates from which voters might choose,’” *Maslow v. Bd. of Elections in City of New York*, 658 F.3d 291, 297 (2d Cir. 2011) (citing and quoting *Anderson v. Celebrezze*, 460 U.S. 780, 786–87 (1983)); *Campbell v. Bysiewicz*, *supra*, violating the First Amendment.

With the COVID-19 pandemic, the burden is even more severe, as shown by the evidence submitted by Plaintiffs. *See* Exs. 2-3. *At the very least*, it cannot be said that a requirement to collect over 1,000 signatures in under 20 days is “trivial” warranting the type of deference upon which the State Defendants insist. *Price*, 540 F.3d at 110 (finding state law election burdens on primary voters “not trivial” and applying *Anderson-Burdick*). Thus, this Court should weigh the severity of the restrictions against the State’s offered reasons for them and resolve this case under the *Anderson-Burdick* test.

B. The State’s Reasons Fail to Justify the Restrictions

The State Defendants put forward one “main interest” in regulating primary ballot access, “simply to ensure orderly and fair elections.” ECF No. 28-1 at ¶ 9.² Given that the regulations

² The Democratic State Central Committee, through its executive director, says that it opposes further changes to the petitioning requirements in Connecticut, but falls short of saying that it believes any change expanding ballot access would violate the party’s constitutional rights. The director simply says that she believes Governor Lamont’s changes are “reasonable” and no further action is needed. ECF No. 29 at 9, 40 of 43.

The director further says that “disband[ing] endorsement convention process would harm the DSCC’s ability to manage its own party,” *id.*, but plaintiffs seek no such thing. Plaintiffs seek

challenged here prevent a primary election from even occurring over 90% of the races for State Representative or State Senator, it is hard to see how the state is advancing the purpose it purports to advance with its Ballot Access Laws. The State further fails to justify how plaintiffs' proposed remedies would in any way undermine its admittedly great interest in orderly and fair elections. Plaintiffs – candidates and voters – obviously share an interest with the State Defendants in orderly and fair elections. They simply want orderly and fair elections to take place, with voter and candidate participation. They simply want elections to take place with more than one choice of candidate on the ballot. They want the voters—members of the Democratic Party of Connecticut—to decide, instead of smoke-filled – or smoke-free – rooms of party insiders.

The only concrete complaint the State Defendants put forward about the plaintiffs' proposed relief is in maintaining the 16-day window that Governor Lamont's order imposes on the collection of signatures, a 16-day window ending June 11, 2020. The State says it must maintain that deadline because "extending it beyond the two days it already has been extended could significantly interfere with the broader election calendar." ECF No. 28-1 at 20 of 116.

But the State's own evidence shows this not to be the case: Mr. Bromley's declaration states that Registrar of Voters must be given seven days to verify the signature pages submitted by

ballot access to a party primary run by the state. State law restrictions on party primaries are state action to be adjudicated under the standards of the *Anderson-Burdick* test. The Supreme Court has held that overly burdensome requirements to access the primary ballot can be unconstitutional even where avenues of ballot access for the general election are available. *Bullock v. Carter*, 405 U.S. 134, 146–47 (1972) ("[W]e can hardly accept as reasonable an alternative that requires candidates and voters to abandon their party affiliations in order to avoid the burdens of the filing fees imposed by state law.").

As Plaintiff Bartlett points out, it is unclear whether the executive director and counsel for the DSCC have authority from the committee to intervene in the lawsuit on the side of the State Defendants, Ex. 2 at ¶¶ 15-19, because the DSCC never held a vote. *Id.*

And although the director says the nominating process "reflects the will of the people," ECF No. 29 at 7 of 43, what could reflect the will of the people better than a vote of the party members themselves? Ex. 2 at ¶ 19.

candidates before they can be required to submit them to the Secretary of the State, who in turn needs an additional nine days to review and calculate the total numbers of signatures and report back to the towns who has obtained ballot access. *Id.*

Mr. Bromley admits “that these dates are not set to accommodate the smallest of the offices on the ballot, but are set to accommodate the largest offices such as statewide offices where candidates collect tens of thousands of signatures.” *Id.* ¶ 59b. But this is a significant admission because, in 2020, *no statewide offices are up for election*. The State therefore leaves unexplained: Why do Registrars of Voters and the Secretary of the State need as much time – sixteen days – to count and verify the signatures, as the candidates need to collect them? It is not said what steps the Registrars or the Secretary must take in order to verify, review, count, or calculate, or why they would require sixteen days. It is therefore the State Defendants’ pure speculation that extension of the deadline to collect signatures would in any way “disturb the election calendar.” It would not.

Under the governing *Anderson-Burdick* standard, plaintiffs have easily shown a severe burden on voters’ associational rights imposed by Connecticut’s Ballot Access Laws, even as modified by Governor Lamont’s executive order. The State Defendants fail to justify the severe burdens imposed by Connecticut’s Ballot Access Laws with anything besides the vague invocation of “orderly and fair elections,” an interest that plaintiffs and the undersigned share with State Defendants. Contrary to the State Defendants’ contentions, the weight of the State Defendants’ and the Plaintiffs’ evidence demonstrate a very high likelihood of success on the Plaintiffs’ First Claim. The State Defendants’ memorandum fails to address the other three factors weighed by courts considering preliminary injunctions, such as irreparable harm and the public interest.

As a result, and for the reasons stated above, Plaintiffs' motion should be granted, and an order in the nature of the relief requested in the Motion, ECF No. 9 at pp. 2-3 (prayer for relief), should be issued.

Dated: June 2, 2020

Respectfully Submitted,

PLAINTIFFS, ANDY GOTTLIEB,
LORNA CHAND, JASON BARTLETT,
AND RICHARD LACOURCIERE, FOR
THEMSELVES AND THE PROPOSED
CLASS OF CONNECTICUT VOTERS

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UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

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Case No. 3:20-cv-623

June 2, 2020

SUPPLEMENTAL DECLARATION
AND EXPERT REPORT OF
ANDY GOTTLIEB

I, Andy Gottlieb, hereby declare this 2nd day of June, 2020 based on facts within my personal knowledge:

1. The State of Connecticut's brief and the Democratic State Central Committee's brief are both misleading and inaccurate in multiple respects.
2. The State alleges that "Connecticut's overall election scheme is generous." From my experience as a petitioning candidate in 2018 who did my utmost to get on the Democratic primary ballot for state Senate and was still unsuccessful, I can attest that this is not true.
3. From my research, only Connecticut and New York maintain such severely restrictive ballot access laws for party primaries; other states require a smaller number of signatures (with a much longer petitioning period than 14 days) for comparable offices or the payment of a token filing fee to get on the ballot.
4. The State maintains that "the candidate may attain primary ballot access if they can evidence a sufficient showing of support from their enrolled party members at large." Permitting voters to sign petitions only within an artificially cramped 14-day window (or even 16 days, per

Executive Order 7LL) does not allow the enrolled party members a realistic amount of time to show their support.

5. The vast majority of party members I encountered in my 2018 campaign were willing to sign my petition.

6. Ted Bromley makes certain assertions about the ease of Plaintiff Bartlett being able to attain ballot access given the constraints of 1,028 needed signatures and 10 volunteers within 16 days. I can attest that, in my 2018 campaign, I needed 1,014 signatures and had eight volunteer petition circulators (in addition to myself) to collect them in 14 days. Under those conditions, it was next to impossible to secure ballot access. I petitioned every single day, averaging roughly eight hours a day. Other volunteers' time commitments varied when available, from approximately eight hours to two hours on a particular day. My campaign, working up until the last minute to gain and deliver signatures by the 4:00 PM deadline on the 14th day, submitted 1,120 signatures, of which 982 were ruled valid by town registrars, falling 32 signatures short of access. I cannot imagine how we could have put in any more effort in such a limited timespan.

7. The DSCC alleges that "[T]he lead plaintiff in this case, Andy Gottlieb, in 2018 returned to his hometown at age 24, joined the Guilford Democratic Town Committee and announced in late April that he would seek the party endorsement for State Senate." This is factually incorrect. I have lived in Guilford my entire life (and have always been registered to vote there as a Democrat), only temporarily residing elsewhere for college at Wesleyan University, graduate school and various internships (including for Connecticut Democrats' own Senator Chris Murphy in Washington). I resumed living in Guilford full-time in 2017 and started attending Guilford Democratic Town Committee (DTC) meetings in June 2017, at the age of 23. Later that year, I became a full member of the DTC, in recognition of my extraordinary efforts supporting

the Democratic slate in that year's municipal elections. I performed many of the tasks listed by the DSCC as necessary for party participation, including attending all town committee meetings, making phone calls and going door to door to hand out campaign literature. I also helmed the town party's campaign headquarters on at least one occasion. I even canvassed alongside our First Selectman nominee, who ultimately prevailed in the election, flipping control from Republican to Democratic.

8. The DSCC states that, "If some do not want to contribute to the party structure, it may make more sense for them to run outside the Democratic Party... In order to maintain its legitimacy, the Democratic Party must actively discourage party splintering [and] minimize voter confusion at the ballot box." This is entirely contradictory, both on the facts and in my experience. I have been a duly registered Democrat since I turned 18, and desire the ability to meaningfully participate in the electoral processes of my party. By attempting to run in the party primary, I sought to avoid the possibility of splintering the party by running as an independent candidate in the general election, which could split Democrats' votes in a first-past-the-post electoral system. The only "voter confusion at the ballot box" I encountered in 2018 was the inexplicable lack of a primary for state Senate, even as there were primaries that August for other state offices.

9. Even after what I viewed as a deeply unfair primary process (or lack thereof) in 2018, I continued volunteering my time to the party, including many hours canvassing to support the Democratic nominee for state Senate in the general election. My party loyalty has never been in question.

10. Being known to the local Democrats in my town, I attempted to go through the party structure in 2018 immediately after the incumbent state senator announced his retirement. When

I contacted local party officials, I was either ignored or, in one case, threatened with political reprisal. And in 2020, I was told by a leading party official that the local DTC would endeavor to forever keep me off the ballot.

11. Jacqueline Kozin states that, “I do know that in the past, the named Plaintiffs in this case sought seats that were not open, but rather already held by Democratic incumbents.” This is also factually incorrect. I sought an open state Senate seat in 2018, after the announced retirement of the Democratic incumbent.

12. I voted in the following municipal, state and federal elections (minus budget referenda):

- August 2012 Democratic Primary for U.S. Senate
- November 2012 General Election
- November 2014 Midterm Election
- April 2016 Democratic Presidential Primary
- November 2016 General Election
- November 2017 Municipal Election
- August 2018 Democratic Primary for Governor, Lieutenant Governor, Attorney General and Treasurer
- November 2018 Midterm Election
- November 2019 Municipal Election

13. In all those years of voting, I was never able to vote in a Democratic primary for the General Assembly (House District 98 and Senate District 12).

I declare under penalty of perjury, pursuant to Title 28, § 1746 of the United States Code, that the foregoing is true, correct, and within my personal knowledge.

/s/Andy Gottlieb

Andy Gottlieb

Dated this 2nd day of June, 2020

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

ANDY GOTTLIEB, et al.,

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Case No. 3:20-cv-623

June 2, 2020

**DECLARATION AND/OR
EXPERT REPORT OF JASON W. BARTLETT**

I, Jason W. Bartlett, hereby declare this 11th day of May, 2020 based on facts within my personal knowledge:

1. I stand by the affidavit that my attorney filed in Court with our motion for a preliminary injunction.

2. As I expected, although I had significant support, I fell short of the 15% of the delegates necessary to qualify for access to the ballot for the 10th Senate District Democratic Party Primary on August 11, 2020. I received 6 votes out of the total of 53 delegates.

3. My affidavit also said that going door-to-door will be impossible. It is not impossible but nearly so, much more difficult than it has been in other years.

4. I went out in my neighborhood today to collect signatures.

5. In order for anyone to actually know who I was from walking my dogs or being seen in the neighborhood in the last four years, I had to pull my mask down so they could see my face.

6. One individual asked me to throw my clipboard with petition across her deck so neither of us had to get too close. She did sign.

7. Another individual wanted to sign, but went inside to get her own pen because she was worried that someone else had already touched the pen that I was providing.

8. Another individual was just incensed that I was going door-to-door in-person in the time of COVID-19 and refused to even consider signing a petition.

9. Theories of how COVID-19 spreads and how it affects a person's health are different and vary from household to household.

10. It has been difficult to recruit trained individuals to volunteer or even be hired to collect petition signatures because of the COVID-19 pandemic.

11. I have also made other efforts to collect petition signatures, such as emailing and texting the petitions, posting them on social media, and posting them on my website.

12. With all of my efforts, I have been able to collect over 150 signatures so far. I will continue working as diligently as I can with as many individuals as I can to collect as many signatures as I can. However I still believe that if an order from this Court does not issue, time will run out and irreparably harm the ability of myself and other candidates for office to meaningfully access the ballot, unless they are well-connected and have the support of someone like the New Haven Democratic Party Chair and can qualify through party convention.

13. I have authorized my attorney to settle this case if the number of signatures is reduced to one percent of the total number of registered party members in the district and the number of days is extended by five days to an extra week. I believe that this is more than fair and protects the voters' First Amendment rights.

14. This case is about the voters of New Haven and West Haven and other towns across Connecticut, voters in towns dominated by one party or another, voters who will only have a realistic voice in the selection of their elected representatives if they can choose from a full range

of candidates in the state party primary. Unless candidates are given reasonable access to the ballot in the state party primary, Democratic Party insiders will be able to maintain a political monopoly over many state senate and state representative districts in our state. Unless this Court takes action, the ballot access restrictions in the Governor's order will deny thousands of voters in towns and cities across Connecticut the First Amendment right to vote for the candidate of their choice, including candidates with significant support.

15. The Democratic State Central Committee has supposedly intervened in this lawsuit.

16. As a former State Central Committee member as recently as last month, I know that for a decision like whether to intervene in a lawsuit, State Central Committee members should have been queried and provided a forum as to the question of whether intervention was an appropriate response.

17. Neither I nor any current member of the Democratic State Central Committee was afforded a voice in whether the State Central Committee should be involved in this lawsuit.

18. I would argue that the best way to determine the will of the members of the Democratic Party is by having primary elections where the voters are the members of the Democratic Party.

19. I want to know why the State Central Committee would not want all Democrats to express their desires in this time of COVID-19.

* * *

I declare under penalty of perjury, pursuant to Title 28, § 1746 of the United States Code, that the foregoing is true, correct, and within my personal knowledge.

/s/Jason W. Bartlett
Jason W. Bartlett
Dated this 2nd day of June, 2020

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

ANDY GOTTLIEB, et al.,

Plaintiffs,

v.

NED LAMONT, et al.,

Defendants.

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Case No. 3:20-cv-623

May 11, 2020

DECLARATION AND/OR
EXPERT REPORT OF SERGIO RODRIGUEZ

I, Sergio Rodriguez, hereby declare this 2nd Day of June, 2020 based on facts within my personal knowledge:

1. I am a registered Connecticut voter in New Haven, Connecticut and member of the Connecticut Democratic Party.
2. I have filed paperwork to run for the office of Registrar of Voters for the City of New Haven.
3. I have experience running campaigns and petition signature drives. I have run four primary campaigns for alderman, five general election campaigns for alderman, one primary for State Representative, and one city-wide primary for City Town Clerk. In 2013, I successfully secured over 3,400 signatures of registered Democrats in New Haven for City Town Clerk. That took 18 trained volunteers working every day for ten days.
4. I need to collect over 1,429 signatures of registered Democrats in New Haven to qualify for the August 11, 2020 primary.
5. I currently have four people working eight to nine hours per day gathering signatures. They have been working since the middle of last week.

6. It has been difficult finding individuals who want to go out and interact with the public due to the COVID-19 crisis so door-to-door canvassing is not producing the same numbers as in previous elections.

7. There aren't as many outdoor events that provide large numbers of people, which was a significant contributing factor in my successful petition signature gathering in the past, other than sustained door-to-door efforts.

8. Outdoor concerts, street fairs, community barbecues, events at New Haven's International Festival of Arts & Ideas, neighborhood community summer popups, Cityseed and other farmers' outdoor markets are simply not being held the way they have been held in the past. Without any open air events that provide significant numbers, it appears we may be unable to get the 1,429 signatures needed to qualify for the August primary.

9. This process has been extremely challenging. Many members of the public are frightened to open the door, touch a pen, or interact with anyone coming to the door wearing a mask.

10. I have managed to obtain almost 300 signatures so far but I am not sure how many are valid yet.

11. I am also trying to get signatures electronically. I have sent over 500 emails with only 8 petitions returned and posted petition on facebook with over 1000 friends and only two returns. I would not consider this an effective or efficient way of collecting signature; some friends could not even print the petition form for signing. The democratic voter list provided by the current Registrars office does not include emails or phone numbers to be able to reach out to voter who are democrats; this also contributes to the challenge of getting signatures to be placed on the ballot.

12. I am available to answer any questions the Court may have about my experience.

13. I would like to be added as a plaintiff to this case, so that the requirements for ballot access for my campaign are reduced, as requested in plaintiffs' motion.

* * *

I declare under penalty of perjury, pursuant to Title 28, § 1746 of the United States Code, that the foregoing is true, correct, and within my personal knowledge.

Sergio Rodriguez

Sergio Rodriguez
Dated this 2nd day of June, 2020

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

ANDY GOTTLIEB, et al.,

Plaintiffs,

v.

NED LAMONT, et al.,

Defendants.

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Case No. 3:20-cv-623

May 28, 2020

VERIFIED AFFIDAVIT AND/OR
EXPERT REPORT OF TAWANA GALBERTH

I, TAWANA GALBERTH, hereby declare this 28TH day of May, 2020 based on facts within my personal knowledge:

1. I am a registered Connecticut voter who resides in New Haven, Connecticut.
2. I am the campaign manager for Alex Taubes for CT Senate for the 11th Senate District.
3. With Governor Lamont's order, our campaign needs to collect 1,016 signatures in sixteen days, starting on May 26 with a deadline of June 11, 2020 at 4:00pm.
4. I have over twenty years of experience working with the Democratic Party with petitions and getting signatures.
5. Recently, I worked on the Joe Ganim for Governor Campaign in 2018, during which time the campaign petitioned onto the ballot for the office of Connecticut Governor. To get on the ballot we needed thousands of signatures, but we were able to successfully get the signatures in the required amount of time.

6. It is impossible for a candidate to do everything himself. In order for someone to get as many signatures as 1,000 or more, a candidate needs to have a dedicated field team of workers who are motivated to work long hours day after day until all of the signatures are collected.

7. I have over twenty years of experience putting together teams to collect signatures on a mass basis, for offices ranging from City Alderman to President of the United States.

8. In my knowledge, training, and experience, and to a degree of professional certainty, a highly-skilled campaign worker who works hard for seven hours during the day can collect up to 80 or more valid Democratic Party registered voter signatures in New Haven.

9. On Tuesday, May 26, the petitions for Eleventh Senate District were finally made available by the Secretary of the State's Office. We got them on the first day that they were available.

10. On every day since then, we have launched with workers to collect signatures so that Alex can qualify for the ballot in the Eleventh Senate District.

11. I have recruited, trained, and worked side-by-side with a crew of paid workers to collect the signatures for Alex.

12. Among the people who I have recruited to collect signatures is Renee Brown. In my knowledge, training, and experience, Ms. Brown is among the most highly-skilled at collecting petition signatures of anybody I have worked with in my twenty years of experience. I have worked with her on campaigns in the past, most recently Toni Harp for Mayor in 2019.

13. In an average seven hour shift, in my knowledge, training, and experience, to a degree of professional certainty, Ms. Brown is able to collect at least 80 valid signatures.

14. COVID-19 has affected everything in our society. Petition signature gathering is no exception. In fact, petition signature gathering has become much much more difficult and is now unfair because of the COVID-19 pandemic.

15. On Wednesday and Thursday, Ms. Brown put in seven hour shifts and worked hard both days. She walked highly populated areas of Fair Haven within the Eleventh Senate District where I have experience collecting many hundreds of signatures over the years.

16. On those two days, Ms. Brown was only able to collect a grand total of 12 signatures. Normally I would expect Ms. Brown to collect more than 80 in that time.

17. I personally observed that Ms. Brown was working hard throughout her seven hour shifts. Lack of diligence was not the reason for the lack of signatures.

18. Another worker I have recruited to collect signatures is Anthony. In my experience petitioning on the Ganim campaign, Anthony could collect over 100 signatures in a day. He even won awards for his signature gathering.

19. Anthony worked a seven-hour shift today and was able to collect 13 signatures.

20. On the Ganim campaign, it was a reliable shorthand that it cost the campaign about \$1 to \$2 per signature, with workers earning \$60-80 per day on a good day. But at the rate that highly-skilled paid petition signature gatherers are collecting signatures during COVID, it will cost campaigns \$10 or more per signature, if workers are earning the same \$60-80 per day at an hourly rate.

21. The reason for the lack of signatures – and the added costs and time imposed on candidates – is simple: COVID-19.

22. People don't want to answer their doors because of COVID-19. Not everyone, of course, but most people.

23. Other people don't even believe that there will be an election because they haven't seen any outreach from our elected leaders about their plans for the coming year.

24. Other people are unwilling to sign because they are afraid of getting infected.

25. While Ms. Brown was collecting signatures in an apartment building, I received a complaint from the building manager saying that she was not allowed to go door-to-door. The reason given was the COVID-19 pandemic. Alex has a lot of support in the building because he lives there. In normal times, multifamily housing is the most accessible place to collect signatures, especially in inclement weather, because the hallways are covered and protected from the rain.

26. The next most accessible place is large gatherings such as festivals, carnivals, parades—the type of events that are banned by the Governor's executive orders and by our Mayor right now. Normally in Fair Haven we would have a lot more people on the streets.

27. I have been told that people are expected to sign the petitions electronically or by mail.

28. In my experience, we have never required a person to have a physical home address – let alone a computer, an internet connection, and the knowledge to be able to use them – in order to participate in elections. I feel that that is unfair practices.

29. Also, as a human service worker, I realize that every home does not have a computer or a phone in it.

30. So how can we fairly expect a person to sign a petition electronically or through the mail, if they do not have a home or a computer or knowledge on how to use these new electronic methods? I do not know how to electronically sign a petition under the Governor's order and I have been doing this for over twenty years. It is unfair to assume that people have either a computer or a mailing address also.

31. Social distancing makes going door-to-door extremely difficult. It also is making people less aware of what's going on in their community, like how they are going to get out and vote. Word of mouth is the most effective GOTV method. But word is not getting out because of COVID. In my twenty years of experience I am noticing things are different because of COVID.

32. Organizing the petition signature drive itself has become more difficult because of COVID. I cannot do job interviews for new recruits. I cannot go door-to-door in a group anywhere, which is something we often do to introduce ourselves to the community. I cannot even take volunteers in a group to train them at getting signatures, because it would require so much close in-person interaction. I cannot even take the candidate out walking door-to-door to meet the people.

33. We have made strong attempts to put our petition online, on social media, and to send it to people by e-mail and we have followed up. But the sheer number of tasks involved – printing, signing, taking a picture, emailing it back – make it time-consuming and almost impossible. And we can only get one at a time that way. Door-to-door is much more efficient. That is why we do door-to-door.

34. Office space is more difficult to get because of the pandemic. Stores we frequent during campaigns – like Staples – are closed or have restricted hours because of the pandemic, which requires us to drive longer distances to access anything we need for the campaign. Everything is being made harder and keeping requirements substantially the same is very unfair.

35. The Governor's order reduces the signatures required by 30% and gives us 2 extra days. Unless he reduces it further, and gives us more time, he will be making it impossible for people like Alex – who have a significant amount of support – to make it on the ballot and be heard on Election Day.

36. Daily I am receiving phone calls from people who want to work on this campaign who don't know how it's going to work because of social distancing. We started planning in January and every week and every month things are changing making it impossible to plan anything.

37. I pray that this Honorable Court will issue a ruling that will protect the voters' rights during this pandemic, prior to Election Day, so that we have a chance in this.

* * *

I declare under penalty of perjury, pursuant to Title 28, § 1746 of the United States Code, that the foregoing is true, correct, and within my personal knowledge.

/s/Tawana Galberth
Signed Electronically With Assistance of Alex Taubes
Dated this 28th day of May, 2020

NOTARIZATION

Subscribed to and sworn before me, this 28th day of May, 2020, personally, before me.

/s/
Alexander T. Taubes, Esq.
Commissioner of the Connecticut Superior Court

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

ANDY GOTTLIEB, et al.,

Plaintiffs,

v.

NED LAMONT, et al.,

Defendants.

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Case No. 3:20-cv-623

May 28, 2020

VERIFIED AFFIDAVIT OF RENEE BROWN

I, RENEE BROWN, hereby declare this 28TH day of May, 2020 based on facts within my personal knowledge:

1. I am a registered Connecticut voter who resides in New Haven, Connecticut.
2. I was hired by Tawana Galberth to collect petition signatures for Alex Taubes's campaign for State Senate in the Eleventh District in 2020.
3. I have experience collecting petition signatures in the past for many campaigns.
4. In my experience, campaigns pay me about \$1 a signature. When I work a seven-hour shift, I collect about 60-80 signatures, and that is a decent pay for that day.
5. In my two seven-hour shifts for Alex's campaign I have collected a total of 18 signatures.
6. Thankfully, Alex is paying me by the hour and not by the signature. But as a campaign worker, I recognize the unfairness that he cannot get the signatures without a lot more effort.
7. I attach to this affidavit the petitions that I have taken to the people over the past two days.

8. I walked all of James Street in New Haven. I also walked all of Lombard Street. I also walked much of Grand Avenue, including a multifamily building at 657 Grand Avenue. I worked as hard as I can to collect as many signatures as I could. The voters who were willing to speak to me were highly receptive to signing Alex's petition. But so many people were unwilling to talk because of COVID.

9. There's not much else to it. The pandemic makes it harder. Period. In my opinion, the rules should be relaxed so we can find more productive uses of our time.

10. I am available to speak further about my experiences as a campaign worker in the pandemic. Thank you for considering my opinion.

* * *

I declare under penalty of perjury, pursuant to Title 28, § 1746 of the United States Code, that the foregoing is true, correct, and within my personal knowledge.

/s/Renee Brown
Signed Electronically With Assistance of Alex Taubes
Dated this 28th day of May, 2020

NOTARIZATION

Subscribed to and sworn before me, this 28th day of May, 2020, personally, before me.

/s/
Alexander T. Taubes, Esq.
Commissioner of the Connecticut Superior Court

WARNING: IT IS A CRIME TO SIGN THIS PETITION IN THE NAME OF ANOTHER PERSON WITHOUT LEGAL AUTHORITY TO DO SO AND YOU MAY NOT SIGN THIS PETITION IF YOU ARE NOT AN ELECTOR.

PRIMARY PETITION FOR MULTI-TOWN DISTRICT OFFICE(S)

Petition Circulated in Town of _____ (To be filled in before circulating)
(name of municipality)

A. SECRETARY MUST FILL OUT THIS PART (A) BEFORE GIVING OUT THIS FORM

MULTI-TOWN DISTRICT: 11th

NAME OF PARTY / DATE OF PRIMARY: DEMOCRATIC
(party)

August 11, 2020
(date of primary)

NAME(S) OF CANDIDATE(S)

ADDRESS

OFFICE(S) SOUGHT

Alex Taubes

657 Grand Avenue, Unit A305
New Haven, CT 06511

State Senate

THIS PETITION MUST BE FILED WITH THE REGISTRARS OF VOTERS in the town of circulation **not later than 4:00 p.m. on June 11, 2020.**

B. We, the undersigned, being enrolled members of the above party in the above political subdivision of the above municipality, do hereby petition that there be printed on the voting machine ballot labels to be used in the primary of said party in said political subdivision to be held on the date above specified the names of the above individuals as candidates for nomination to the office(s) specified:

SIGNATURE OF ENROLLED ELECTOR	PRINTED NAME OF ELECTOR	BIRTH DATE	STREET ADDRESS
<i>Charles Dease</i>	Charles Dease	7/28/68	568 Lombard St
<i>Joe N Dease</i>	Joe Dease	9/11/44	568 Lombard St
<i>Mollie Dease</i>	Mollie Dease	8/17/44	568 Lombard St
<i>Marya Badier</i>	555 Lombard St	2/38	555 Lombard St N.H.
<i>Mildred Uzole</i>	Mildred Uzole	6-46	529 Lombard St
<i>Bentley Velez</i>	614 N. H. Ave	8-12-55	474 Boston
<i>Carlos Modarri</i>	Carlos Modarri	8-2-57	365 Lombard Ave
<i>Antonio Cuhero</i>	Antonio Cuhero	10/24/57	311 Lombard St
<i>Sally Jackson</i>	Sally Jackson	9/21/65	242 Lombard St 3rd floor
<i>Yanliang</i>	Yanliang	5/6/95	549 Lombard Street

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PRIMARY PETITION FOR MULTI-TOWN DISTRICT OFFICE(S)

Petition Circulated in Town of _____ (To be filled in before circulating)
(name of municipality)

A. SECRETARY MUST FILL OUT THIS PART (A) BEFORE GIVING OUT THIS FORM

MULTI-TOWN DISTRICT: 11th

NAME OF PARTY / DATE OF PRIMARY: DEMOCRATIC August 11, 2020
(party) (date of primary)

<u>NAME(S) OF CANDIDATE(S)</u>	<u>ADDRESS</u>	<u>OFFICE(S) SOUGHT</u>
Alex Taubes	657 Grand Avenue, Unit A305 New Haven, CT 06511	State Senate

THIS PETITION MUST BE FILED WITH THE REGISTRARS OF VOTERS in the town of circulation **not later than 4:00 p.m. on June 11, 2020.**

B. We, the undersigned, being enrolled members of the above party in the above political subdivision of the above municipality, do hereby petition that there be printed on the voting machine ballot labels to be used in the primary of said party in said political subdivision to be held on the date above specified the names of the above individuals as candidates for nomination to the office(s) specified:

SIGNATURE OF ENROLLED ELECTOR	PRINTED NAME OF ELECTOR	BIRTH DATE	STREET ADDRESS
<i>Michelle Smith</i>	Michelle Smith	1-11-60	657 Grand Ave Apt 208
<i>Amber Carter</i>	Amber Carter		205 Grand Ave Apt 205
<i>Maura Riddick</i>	Maura Riddick	5-18-53	657 Grand Ave Apt 311
<i>Julia Baez</i>	Julia Baez	8-23-1940	657 Grand Ave 306
<i>Jasmine Reyes</i>	Jasmine Reyes	5-8-90	657 Grand Ave Apt 303
<i>William Brevard</i>	William Brevard	9-28-89	260 James Street
<i>Jason Gill</i>	Jason Gill	09/04/80	245 James
<i>James White</i>	James White	3-11-75	James (25)
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(ED-619DIST)Rev. 5/03 (Circulator: Read separate instruction sheet before circulating)[G forms ed-600's ed-619a.doc] [7]

WARNING: IT IS A CRIME TO SIGN THIS PETITION IN THE NAME OF ANOTHER PERSON WITHOUT LEGAL AUTHORITY TO DO SO AND YOU MAY NOT SIGN THIS PETITION IF YOU ARE NOT AN ELECTOR.

PRIMARY PETITION FOR MULTI-TOWN DISTRICT OFFICE(S)

Petition Circulated in Town of _____ (To be filled in before circulating)
(name of municipality)

A. SECRETARY MUST FILL OUT THIS PART (A) BEFORE GIVING OUT THIS FORM

MULTI-TOWN DISTRICT: 11th

NAME OF PARTY / DATE OF PRIMARY: DEMOCRATIC August 11, 2020
(party) (date of primary)

<u>NAME(S) OF CANDIDATE(S)</u>	<u>ADDRESS</u>	<u>OFFICE(S) SOUGHT</u>
Alex Taubes	657 Grand Avenue, Unit A305 New Haven, CT 06511	State Senate

THIS PETITION MUST BE FILED WITH THE REGISTRARS OF VOTERS in the town of circulation *not later than 4:00 p.m. on June 11, 2020.*

B. We, the undersigned, being enrolled members of the above party in the above political subdivision of the above municipality, do hereby petition that there be printed on the voting machine ballot labels to be used in the primary of said party in said political subdivision to be held on the date above specified the names of the above individuals as candidates for nomination to the office(s) specified:

SIGNATURE OF ENROLLED ELECTOR	PRINTED NAME OF ELECTOR	BIRTH DATE	STREET ADDRESS
1 <i>Charisha Gatson</i>	Charisha Gatson	3/25	218 Lombard Street Apt 2
2 <i>Carol V. Vello</i>	Carol V. Vello	1/23/77	146 Lombard
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**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

ANDY GOTTLIEB, et al.,

Plaintiffs,

v.

NED LAMONT, et al.,

Defendants.

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Case No. 3:20-cv-623

June 2, 2020

DECLARATION OF ANTONIA OGLESBY

I, Antonia Oglesby, hereby declare this 2nd day of June, 2020 based on facts within my personal knowledge:

1. I am over 18 years of age and recognize the obligations of an oath.
2. I am Student Senate Vice President at Housatonic Community College, Co-President of the Political Science and History Club, and Student Advisory Committee Representative. I have also served as a legislative intern for the Connecticut General Assembly.
3. I am a registered Connecticut Democrat.
4. I did text canvassing for petitions for Alex Taubes.
5. In the span of 3 hours I texted 193 different numbers.
6. Out of 193 numbers I received 1 reply which had said, "I am 100% a registered Republican, I would rather not vote then ever vote for a Democrat. I think the dem agenda is a complete joke, nothing against your candidate. Tell Lamont he's doing a real good job at screwing up Connecticut. Already one of the highest deficits in the nation and it just continues to grow. Frankly, I don't understand how we keep electing Democratic governors; you guys have zero clue how to balance a budget. It's disgraceful. Take my number off all these lib contact books: TRUMP2020."

7. I did not find this method of collecting signatures effective at all as the response rate was .005%.

I declare under penalty of perjury, pursuant to Title 28, § 1746 of the United States Code, that the foregoing is true, correct, and within my personal knowledge.

/s/Antonia Oglesby
Antonia Oglesby
Dated this 2nd day of June, 2020