

1 Jeffrey F. Barr (Bar # 7269)
2 Alicia R. Ashcraft (Bar # 6980)
3 Ascraft & Barr LLP
4 9205 West Russell Road, Suite 240
5 Las Vegas, NV 89148
6 702-631-4755
7 barrj@ashcraftbarr.com

8 Michael Francisco* (CO Atty. No. 39111)
9 Christopher O. Murray* (CO. Atty No. 39340)
10 First & Fourteenth PLLC
11 800 Connecticut Avenue NW, Suite 300
12 Washington, D.C. 20006
13 202-998-1978
14 michael@first-fourteenth.com
15 chris@first-fourteenth.com

16 Sigal Chattah (Bar # 8264)
17 5875 S. Rainbow Blvd #204
18 Las Vegas, NV 89118
19 702-360-6200
20 sigal@thegoodlawyerlv.com

21 David A. Warrington* (VA Bar No. 72293)
22 Gary M. Lawkowski* (VA Bar No. 82329)
23 2121 Eisenhower Ave, Suite 608
24 Alexandria, VA 22314
25 703-574-1206
26 DWarrington@dhillonlaw.com
27 GLawkowski@dhillonlaw.com

28 * *Pro hac vice application forthcoming*

1
2 **IN THE FIRST JUDICIAL DISTRICT COURT**
3 **OF THE STATE OF NEVADA IN AND FOR CARSON CITY**

4
5 REPUBLICAN NATIONAL
6 COMMITTEE; NEVADA
7 REPUBLICAN PARTY; DONALD J.
8 TRUMP FOR PRESIDENT 2024, INC.;
9 SCOTT JOHNSTON

10 v.

11 FRANCISCO AGUILAR, in his official
12 capacity as Nevada Secretary of State;
13 State of NEVADA; CARI-ANN
14 BURGESS, in her official capacity as
15 the Washoe County Registrar of
16 Voters; JAN GALASSINI, in her
17 official capacity as the Washoe County
18 Clerk; LORENA PORTILLO, in her
official capacity as the Clark County
Registrar of Voters; LYNN MARIE
GOYA, in her official capacity as the
Clark County Clerk.

Case No.:

Dept. No.:

**COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF**

Arbitration Exemption: Declaratory
and Injunctive Relief

19 Plaintiffs Republican National Committee and the Nevada Republican Party,
20 Donald J. Trump for President 2024, Inc., and Scott Johnston, by and through
21 undersigned counsel, file this Complaint against Francisco Aguilar, in his official
22 capacity as Nevada Secretary of State; the State of Nevada; Cari-Ann Burgess, in her
23 official capacity as the Washoe County Registrar of Voters; Jan Galassini, in her
24 official capacity as the Washoe County Clerk; Lorena Portillo, in her official capacity
25 as the Clerk County Registrar of Voters; and Lynn Marie Goya, in her official capacity
26 as the Clark County Clerk; and allege as follows:

27 **NATURE OF THE CASE**

28 1. Nevada law permits the counting of some ballots received by mail after

1 election day, within time limits established by the Nevada legislature. This lawsuit
2 seeks to enforce one critical component of Nevada’s post-election day counting of
3 ballots: the requirement that mail ballots received after election day but lacking a
4 postmark are not counted, as set forth in NRS 293.269921(1)-(2).

5 2. This lawsuit is necessary because the Nevada Deputy Secretary of State
6 for Elections recently testified that this key safeguard of Nevada law will be ignored
7 in upcoming elections and that mail ballots *without a postmark* will be counted if
8 received up to 3 days after election day. *See* Deputy Secretary of State for Elections
9 Mark Wlaschin, testimony before Nevada Advisory Committee on Participatory
10 Democracy, April 23, 2024, available at [4/23/2024 - Secretary of State - Advisory Committee](#)
11 [on Participatory Democracy - YouTube \(starting at 1:30:09\)](#).

12 3. Counting non-postmarked mail ballots is not permitted by Nevada law,
13 which allows late-arriving mail ballots to be counted in only two circumstances: (1)
14 the ballot is accompanied by a valid postmark indicating it was mailed on or before
15 election day, or (2) the ballot has a postmark but “the date of the postmark cannot be
16 determined.” Legibly postmarked ballots are counted if received four days after
17 election day. NRS 293.269921(1). Ballots bearing postmarks with dates that are
18 illegible or otherwise cannot be determined are appropriately given a shorter
19 timeframe of three days. NRS 293.269921(2).

20 4. In enacting (and recently amending) section 293.269921, the Nevada
21 legislature has made policy judgments about which mail ballots received after
22 election day may be counted. In closely contested elections (and all elections), care
23 must be taken to ensure that ballots cast after election day cannot be counted. Indeed,
24 it is axiomatic to fair elections that once the time for voting has ended, no interested
25 party can add new votes to the mix. The unfairness and opportunity for changing the
26 valid results of an election are self-evident.

27 5. Plaintiffs seek a declaration and injunction to ensure that Nevada voters
28 will have confidence that only those late-arriving mail ballots with evidence of having

1 | been mailed on or before election day will be counted, as the Nevada legislature
2 | intended when it required the presence of a postmark before such late-arriving mail
3 | ballots may be counted.

4 | **JURISDICTION AND VENUE**

5 | 6. This Court has jurisdiction to hear Plaintiffs' claims and to grant
6 | declaratory and injunctive relief pursuant to NRS 295.061, 30.030, 30.040, and
7 | 33.010.

8 | 7. Venue is proper under NRS 13.020 and 13.040 because this action is
9 | against a public officer, certain Defendants are located within the instant judicial
10 | district, the acts complained of herein occurred within the instant judicial district,
11 | and the relief Plaintiff seeks would be granted from within the instant judicial
12 | district.

13 | **PARTIES**

14 | 8. Plaintiff, the Republican National Committee (RNC), is the national
15 | committee of the Republican Party, as defined by 52 U.S.C. § 30101(14), with its
16 | principal place of business at 310 First Street S.E., Washington, DC 20003.

17 | 9. The RNC organizes and operates the Republican National Convention,
18 | which nominates a candidate for President and Vice President of the United States.

19 | 10. The RNC represents over 30 million registered Republicans in all 50
20 | states, the District of Columbia, and the U.S. territories. It is comprised of 168 voting
21 | members representing state Republican Party organizations, including three
22 | members who are registered voters in Nevada.

23 | 11. The RNC works to elect Republican candidates to state and federal office
24 | in Nevada. In the November 2024 general election, Republican candidates will appear
25 | on the ballot in Nevada for election to the Presidency, U.S. Senate, U.S. House of
26 | Representatives, and state offices.

27 | 12. The RNC has vital interests in protecting the ability of Republican
28 | voters to cast, and Republican candidates to receive, effective votes in Nevada

1 elections and elsewhere.

2 13. The RNC seeks to vindicate its own rights and represent the rights of
3 its members, affiliated voters, and candidates.

4 14. The RNC has a strong interest in ensuring that elections in which it and
5 its candidates compete for votes are conducted in a legally structured competitive
6 environment.

7 15. The RNC devotes significant resources to mail-ballot-chasing operations
8 and election integrity activities, including post-election day activities, such as
9 monitoring the processing and counting of mail ballots. If non-postmarked ballots
10 received after election day are counted, the RNC will have to devote resources to
11 ascertaining and ensuring that only ballots mailed by election day are counted.

12 16. Plaintiff Nevada Republican Party (NVGOP) is a political party in
13 Nevada with its principal place of business at 2810 West Charleston Blvd. #69, Las
14 Vegas, NV 89102.

15 17. The NVGOP exercises its federal and state constitutional rights of
16 speech, assembly, petition, and association to “provide the statutory leadership of the
17 Nevada Republican Party as directed in the Nevada Revised statutes,” to “recruit,
18 develop, and elect representative government at the national, state, and local levels,”
19 and to “promote sound, honest, and representative government at the national, state
20 and local levels.” NRCC Bylaws, art. II, §§1.A-1.C.

21 18. The NVGOP represents over 550,000 registered Republican voters in
22 Nevada.

23 19. The NVGOP has the same interests as the RNC in vindicating its own
24 rights, preserving resources, and representing the rights of its members, affiliated
25 voters, and candidates.

26 20. Plaintiff Donald J. Trump for President 2024, Inc. (Trump Campaign) is
27 the principal committee for President Donald J. Trump’s campaign for President with
28 its headquarters in West Palm Beach, FL.

1 21. Donald J. Trump will be a candidate for President on the ballot for the
2 2024 Nevada general election (by and through presidential and vice presidential
3 electors) and is a Republican affiliated with the RNC and NVGOP.

4 22. The Trump Campaign has the same interests in this case as the RNC
5 and NVGOP with respect to the candidacy of President Trump and seeks to vindicate
6 those interests in the same ways. The Trump Campaign intends to invest resources
7 seeking voter support for the Nevada general election.

8 23. Plaintiff Scott Johnston is a 60-year resident of Nevada and a registered
9 Nevada voter residing in Washoe County. He regularly votes in Nevada elections, and
10 he plans to vote in the November 2024 general election, including for U.S. President,
11 Senate, and the House of Representatives. Mr. Johnston is registered as a
12 Republican, supports Republican candidates, and has volunteered on behalf of the
13 Republican Party. He is a member of the Washoe County Republican Party Central
14 Committee, which is the governing body of the Washoe County Republican Party. Mr.
15 Johnston has also served as a precinct captain for the Galena Forest Estates area
16 since 2020, and a Nevada State Central Committee person since 2021.

17 24. Defendant Francisco V. Aguilar is the Nevada Secretary of State and is
18 sued in his official capacity. He serves “as the Chief Officer of Elections” for Nevada
19 and “is responsible for the execution and enforcement of the provisions of title 24 of
20 NRS and all other provisions of state and federal law relating to elections in” Nevada.
21 NRS §293.124.

22 25. Defendant State of Nevada is a political jurisdiction and State of the
23 United States.

24 26. Defendant Cari-Ann Burgess is the Registrar of Voters for Washoe
25 County. She is the county’s chief election officer and is responsible for “establish[ing]
26 procedures for the processing and counting of mail ballots” in Washoe County. NRS
27 293.269925(1); *see id.* 293.269911-.269937, 244.164. Defendant Burgess is sued in her
28 official capacity.

1 Nevada law did not permit the counting of any absent ballots received in the mail
2 after election day. See NRS 293.317 (2019)). These late-arriving ballots are subject
3 to strict limits, as would be expected for the counting of additional ballots received
4 after the election has been completed and the polls have closed.

5 34. Under Nevada law, “[I]n order for a mail ballot to be counted for any
6 election, the ballot must be ... [m]ailed to the county clerk,” “postmarked on or before
7 the day of the election,” and “[r]eceived by the clerk not later than 5 p.m. on the fourth
8 day following the election.” NRS 293.269921(1).

9 35. Nevada law further provides that “[i]f a mail ballot is received by mail
10 not later than 5 p.m. on the third day following the election and the date of *the*
11 *postmark* cannot be determined, the mail ballot shall be deemed to have been
12 postmarked on or before the day of the election.” NRS 293.269921(2) (emphasis
13 added).

14 **B. The 2024 Nevada General Election is Expected to have Substantial**
15 **Mail Ballot Returns**

16 36. Nevada will hold a general federal election on November 5, 2024. In
17 addition to many local and state election matters, the general election will select
18 presidential and vice presidential electors and elect Representatives and a U.S.
19 Senator from the State.

20 37. Under Nevada law, mail ballots “postmarked on or before” November 5,
21 2024, and “[r]eceived by the clerk not later than 5 p.m.” on November 9, 2024, will be
22 counted. NRS 293.269921(1).

23 38. Under Nevada law, postmarked mail ballots whose postmark date
24 “cannot be determined” will be counted if received on or before 5 p.m. on November
25 8, 2024. NRS 293.269921(2).

26 39. On April 23, 2024, the Deputy Secretary of State for Elections, Mark
27 Wlaschin, testified before the Nevada Legislature’s Advisory Committee on
28 Participatory Democracy that Nevada’s policy and practice is to count mail ballots

1 “without a postmark” if they are received within three days of election day. *See*
2 Deputy Secretary of State for Elections Mark Wlaschin, testimony before Nevada
3 Advisory Committee on Participatory Democracy, April 23, 2024, available at
4 [4/23/2024 - Secretary of State - Advisory Committee on Participatory Democracy - YouTube](#)
5 (starting at 1:30:09).

6 40. The Secretary of State participates or sends a designee to participate in
7 the Advisory Committee on Participatory Democracy, which was created pursuant to
8 NRS Chapter 225.

9 41. Upon information and belief, consistent with Deputy Secretary
10 Wlaschin’s testimony, election officials in Nevada have counted and will continue to
11 count mail ballots that lack a postmark and are received on or before 5 p.m. on the
12 third day following the election. Election officials will count mail ballots that lack a
13 postmark and are received on or before 5 p.m. on November 8, 2024.

14 42. Nevada law permits the counting of a mail ballot received after election
15 day only if it bears a postmark indicating it was mailed on or before election day. The
16 law further provides that a mail ballot received after election day where “the date of
17 the postmark cannot be determined” will be counted if received within three days
18 after election day. This minor caveat to the law requiring mail ballots to be
19 postmarked on or before election day applies where the mail ballot envelope has a
20 postmark but the date of the postmark cannot be determined. It does not apply when
21 the mail ballot envelope lacks any postmark whatsoever.

22 43. USPS routinely delivers mail inside of three days within Nevada. For
23 example, the online Service Standard Map for first class mail originating in any Las
24 Vegas zip code shows the letter will be delivered to the Clark County Elections
25 Department within two days:
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Service:

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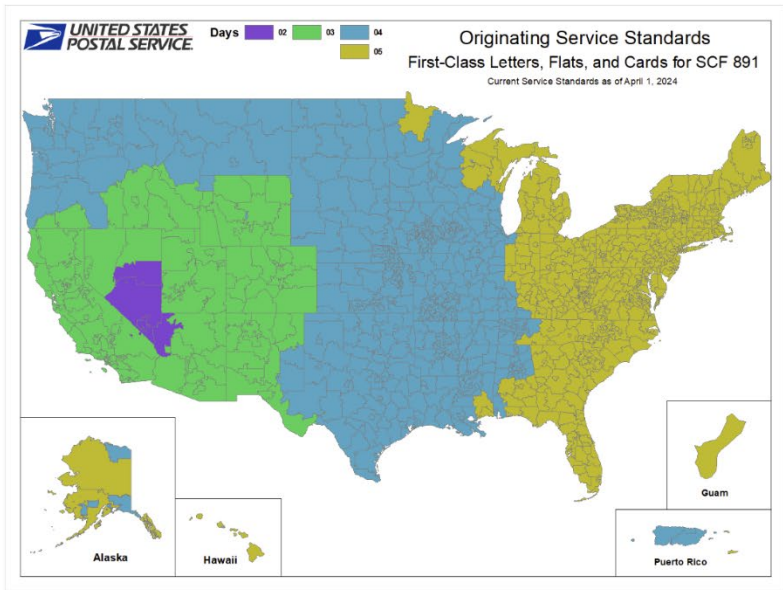
Mail Class:

First-Class Letters & Flats
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ZIP and City Name:

891 LAS VEGAS NV

List cities in alphabetical order



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44. It is therefore possible, if not probable, that mail ballots deposited in the mail after election day could arrive at mail-ballot processing facilities within the three-day deadline, and under Deputy Secretary Wlaschin’s erroneous legal interpretation, those untimely ballots would be counted if they do not bear a postmark.

45. A postmark is printed on mail received by the U.S. Postal Service (USPS) and indicates which USPS office accepted the mail, including the state, zip code, and date of mailing, often with markings indicating the postage has been canceled and cannot be reused.

46. Upon information and belief, some mail ballots will be received by Clark and Washoe County election officials after election day which lack any postmark.

C. Plaintiffs necessarily rely on Nevada’s statutory ballot-counting regime.

47. The RNC, NVGOP, and Trump Campaign rely on provisions of Nevada law in conducting their campaigns, which include resources allocated to the post-election counting and certification processes.

1 48. For example, Nevada law guarantees Plaintiffs the right to be
2 represented on county mail ballot central counting boards. See NRS 293.269929(2)
3 (“The voters appointed as election board officers for the mail ballot central counting
4 board must not all be of the same political party.”). Nevada law also guarantees the
5 right to observe the handling and counting of mail ballots. See NRS 293.269931(1);
6 Nev. Admin. Code 293.322(3), (4); 356(1). Counting all ballots received within three
7 days after Election Day, including non-postmarked ballots, requires Plaintiffs and
8 their members to divert more time and money to post-election mail ballot activities.
9 See NRS 293.269931 (counting may continue up to “the seventh day following an
10 election”).

11 49. In addition, late-arriving ballots without a postmark are not valid, so
12 counting them dilutes the weight of timely, valid ballots. For instance, if 1,000 ballots
13 are mailed after election day and then counted by Nevada because they lack a
14 postmark, the valid votes on or before election day would be diluted by the counting
15 of those 1,000 unlawfully counted ballots.

16 50. Any votes deposited in the mail after the polls close on election day
17 would not be legally cast votes and should not be counted.

18 51. It is possible that the results of a close election could be changed by the
19 counting of ballots cast after election day.

20 52. Dilution of honest votes, to any degree, by the counting of late-cast votes
21 violates the right to vote and prevents the holding of a free and fair election.

22 53. Voting by mail is highly polarized by party, meaning the dilution of votes
23 on account of late-arriving mail ballots directly and specifically harms Plaintiffs. For
24 example, according to the MIT Election Lab, 46% of Democratic voters in the 2022
25 General Election mailed in their ballots, compared to only 27% of Republicans.
26 Charles Stewart III, How We Voted in 2022, at 10 <https://perma.cc/444Z-58ZY>.
27 Accordingly, late-arriving mail ballots that are counted will tend to
28 disproportionately favor Democrat candidates.

1 54. In Nevada, voting by mail is even more polarized by party. For example,
2 in Nevada’s 2020 general election, 60.3% of Democratic voters voted by mail,
3 compared to just 36.9% of Republican voters. *See* Nev. Sec’y of State, 2020 General
4 Election Turnout, <https://perma.cc/Z6F3-SM4N>. Likewise in the 2022 general
5 election, 61.3% of Democrats and just 40% of Republicans voted by mail. *See* Nev.
6 Sec’y of State, 2022 General Election Turnout, <https://perma.cc/N7G7-RUQ9>.

7 55. Moreover, mail ballots from Democrat affiliated voters frequently arrive
8 late, in part because “Democratic get-out-the-vote drives—which habitually occur
9 shortly before election day—may delay maximum Democratic voting across-the-
10 board, and produce a ‘blue shift’ in late mail ballots.” Ed Kilgore, Why Do the Last
11 Votes Counted Skew Democratic?, *Intelligencer* (Aug. 10, 2020),
12 <https://perma.cc/R78D-3Q58>. Indeed, “even if Republicans and Democrats voted in
13 person and by mail at identical levels, Democrats tend to vote later, which in turn
14 (particularly in elections with heavy voting by mail) means early Republican leads in
15 close races could be fragile.” *Id.*

16 56. Indeed, data from the Nevada Secretary of State’s office and county
17 election offices indicates that there were approximately 50% more late-arriving
18 ballots from registered Democratic voters than registered Republican voters in the
19 2020 and 2022 general elections.

20 57. In the 2022 Nevada election for U.S. Senate, media reported that late-
21 arriving mail ballots favored the Democrat and helped swing the final election
22 results. *See* Jacob Solis, *Cortez Masto defeats Laxalt in Senate race, securing majority*
23 *for Democrats*, Nov. 12, 2022 *The Nevada Independent*, available at [Cortez Masto defeats](#)
24 [Laxalt in Senate race, securing majority for Democrats - The Nevada Independent](#) (“Cortez Masto’s
25 delayed victory became clear late Saturday after the extended process of counting
26 mail ballots submitted through the postal service and drop boxes through Election
27 Day. ... Though Laxalt had led Cortez Masto by as much as 23,000 votes on the
28 morning following Election Day, remaining mail ballots counted in urban counties

1 through this week have favored Cortez Masto by upwards of a 2-to-1 margin, erasing
2 Laxalt’s lead by thousands of votes with every update of the count.”)

3 58. In the Nevada 2024 primary elections, Democrat affiliated voters
4 disproportionately voted by mail as compared to Republican affiliated voters. Office
5 of Nev. Sec’y of State, 2024 Presidential Preference Primary Turnout: Cumulative
6 Presidential Preference Primary Election Turnout – Final (Feb. 20, 2024),
7 perma.cc/7USY-5NMY. There were also more Democrat affiliated mail ballots
8 rejected for not being returned correctly. *See* Office of Nev. Sec’y of State, 2024
9 Presidential Preference Primary Turnout: Mail Ballot Information – Cumulative
10 Totals (Feb. 20, 2024), perma.cc/7NTN-JV6L.

11 59. Accordingly, counting mail ballots received after election day which lack
12 any postmark specifically and disproportionately harms Republican candidates and
13 Republican voters.

14 60. Harm from counting mail ballots lacking a postmark that are received
15 after election day is irreparable.

16 61. Separate and distinct from this lawsuit, Plaintiffs have challenged
17 Nevada’s counting of late-arriving mail ballots as violating federal law in the U.S.
18 District Court for the District of Nevada in a case captioned, *Republican National*
19 *Committee et al. v. Cari-Ann Burgess, et al*, No. 24-cv-00198 (D. Nev.). That case
20 remains pending and will not impact the state law issues raised in this complaint.
21 Should the federal court issue relief that impacts the administration of NRS
22 293.269921(2), Plaintiffs will promptly notify the Court.

23 **FIRST CAUSE OF ACTION**

24 **(Declaratory Judgment)**

25 62. The preceding paragraphs are incorporated by reference.

26 63. The Plaintiffs seek declaratory relief that mail ballots received after
27 election day which lack a postmark shall not be counted.

28 64. The Court has the authority to declare rights, status and other legal

1 rights of the parties, regardless of whether further relief could be had.

2 65. The facts and issues presented constitute a justiciable controversy, in
3 which the Plaintiffs assert a legally protected interest.

4 66. The controversy is ripe for determination.

5 67. Plaintiffs are entitled to relief under NRS 30.010 in the form of a
6 declaration that says:

7 a. Nevada law prohibits the counting of all mail ballots received after
8 election day which lack a postmark; and

9 b. Nevada law prohibits the counting of all mail ballots received after
10 election day which do not bear evidence indicating they were mailed on
11 or before election day.

12 68. For the foregoing reasons, the counting of any mail ballots received after
13 election day that lack a postmark violates NRS 293.269921(1)-(2).

14 69. Consistent with the requirements of NRS 233B.110(3), Plaintiffs will
15 serve a copy of the Complaint on the Attorney General.

16 70. The Court should therefore declare the policy and practice of counting
17 mail ballots received after election day that lacks a postmark to be invalid.

18 **SECOND CAUSE OF ACTION**

19 **(Injunctive Relief)**

20 71. The preceding paragraphs are incorporated by reference.

21 72. The counting of mail ballots received after election day which lack a
22 postmark threatens to immediately deprive Petitioners and Petitioners' members of
23 the rights with respect to a fair election conducted in compliance with Nevada law.

24 73. Plaintiffs and Plaintiffs' members have no adequate remedy at law.

25 74. Without injunctive relief, Plaintiffs and Plaintiffs' members will suffer
26 irreparable harm for which compensatory damages are inadequate.

27 75. The RNC and NVGOP, the Trump Campaign, their members,
28 supporters, and voters, and Mr. Johnston have a significant interest in preventing

1 harm that will be created in the upcoming elections by counting mail ballots received
2 after election day which lack a postmark.

3 76. Courts have authority “whenever necessary and proper” to grant further
4 “relief based on a declaratory judgment or decree,” including injunctive relief. NRS
5 30.100. Thus, an injunction can pair with a declaratory judgment under NRS
6 233B.110.” *Smith v. Bd. of Wildlife Comm’rs*, 461 P.3d 164, (Nev 2020) (unpublished);
7 *Aronoff v. Katleman*, 75 Nev. 424, 432 (Nev. 1959) (“[U]nder appropriate
8 circumstances, a declaratory judgment may be coupled with injunctive relief.”).

9 77. Permanent injunctive relief is appropriate to protect voters rights to a
10 “uniform, statewide standard for counting and recounting all votes accurately.” Nev.
11 Const. art. 2 S 1A(10); See also NRS S 293.2546 (5).

12 78. The Court should enjoin Defendants from counting mail ballots received
13 after election day which lack a postmark.

14 **PRAYER FOR RELIEF**

15 **WHEREFORE**, Plaintiff prays for the following relief:

16 A. A declaratory judgment that the policy and practice of counting of mail
17 ballots received after election day that lack a postmark violates NRS
18 293.269921(1)-(2);

19 B. A permanent injunction prohibiting Defendants from counting mail ballots
20 received after election day that lack a postmark, including for the November
21 5, 2024, general election;

22 C. Plaintiffs’ reasonable costs and expenses of this action, including attorneys’
23 fees; and

24 D. All other further relief that Plaintiffs may be entitled to.
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AFFIRMATION

The undersigned hereby affirm that the foregoing document does not contain the social security number of any person.

DATED this 31st day of May, 2024.

~~ASHCRAFT & BARR LLP~~
By: 
Jeffrey F. Barr (Bar # 7269)
9405 West Russell Road, Suite 240
Las Vegas, NV 89148

FIRST & FOURTEENTH PLLC

Michael Francisco (pro hac vice forthcoming)
Christopher O. Murray (pro hac vice forthcoming)

Counsel for Plaintiffs

SIGAL CHATTAH LAW OFFICES
Sigal Chattah (Bar # 8264)

Counsel for Plaintiff Nevada Republican Party

DHILLON LAW GROUP

David A. Warrington* (pro hac vice forthcoming)
Gary M. Lawkowski* (pro hac vice forthcoming)

*Attorneys for Plaintiff Donald J. Trump for
President 2024, Inc.*