

THE LAW OFFICES OF  
BRUCE W. HEPLER

January 2, 2024

**VIA HAND DELIVERY**

Tamara Rueda, Clerk  
Kennebec County Superior Court  
Capital Judicial Center  
1 Court Street, Suite 101  
Augusta, ME 04330

**Re: Trump v. Bellows**  
**Docket No. \_\_\_\_\_**

Dear Tamara:

Enclosed for filing are the following documents:

1. Civil Cover Sheet;
2. Complaint (Petition for Review of Final Agency Action Pursuant to M.R. Civ.P. 80C);
3. Proposed, consented-to, Briefing Schedule;
4. Pro hac vice motion for Scott Gessler, Esq., with Proposed Order;
5. Pro hac vice motion for Ronald Coleman, Esq., with Proposed Order;
6. Pro hac vice motion for Gary Lawkowski, Esq., with Proposed Order; and
7. \$2,275 filing fee (\$175 for petition and \$700 for each pro hac vice motion).

Thank you for your attention to this matter and please call if you have any concerns.

Sincerely,

Bruce W. Hepler

enclosures

cc: Office of the Secretary of State, attn: Shenna Bellows (via email w/encl.)  
Office of the Maine Attorney General, attn: Jason Anton, AAG (via email w/encl.)  
Scott Gessler, Esq. (via email w/encl.)  
Gary Lawkowski, Esq. (via email w/encl.)  
Ronald Coleman, Esq. (via email w/encl.)

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75 Pearl Street, Portland, Maine 04101

Bruce W. Hepler, Esq. p: 207-772-2525 f: 207-772-2111 bhepler@maine.rr.com  
Benjamin E. Hartwell, Esq. p: 207-699-0050 f: 207-772-2111 ben.hartwell.law@gmail.com  
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CONTAINS NONPUBLIC DIGITAL INFORMATION

MAINE JUDICIAL BRANCH

This summary sheet and the information it contains do not replace or supplement the filing and service of pleadings or other papers as required by the Maine Rules or by law. This form is required for the Clerk of Court to initiate or update the civil docket. The information on this summary sheet is subject to the requirements of M. R. Civ. P. 11.

I. COUNTY OF FILING OR DISTRICT COURT JURISDICTION ("X" the appropriate box and enter the County or location)

- Superior Court County: Kennebec
- District Court Location (city/town): \_\_\_\_\_

**Initial Complaint:** A complaint filed as an original proceeding. A filing fee is required.  
**Third-Party Complaint:** An original defendant's action against a third party that was not part of the original proceeding. A filing fee is required.  
**Cross-Claim:** An original defendant's claim against another original defendant. No additional fee is required.  
**Counterclaim:** An original defendant's claim against an opposing party. No additional fee is required.  
**Reinstated or Reopened Case:** Money Judgment Disclosures or post-judgment motions.

II. NATURE OF THE FILING

- Initial Complaint
- Third-Party Complaint
- Cross-Claim or Counterclaim
- Reinstated or Reopened case: Docket Number: \_\_\_\_\_

*If filing a second or subsequent Money Judgment Disclosure, give the docket number of the first disclosure.)*

III.  REAL ESTATE OR TITLE TO REAL ESTATE IS INVOLVED

IV. MOST DEFINITIVE NATURE OF ACTION

*("X" in ONE box. If the case fits more than one nature of action, select the one that best describes the cause of action.)*

GENERAL CIVIL

- Constitutional/Civil Rights**
- Constitutional/Civil Rights
- Contract**
- Contract
- Declaratory/Equitable Relief**
- Declaratory Judgment
- General Injunctive Relief
- Other Equitable Relief
- Non-Personal Injury Torts**
- Auto Negligence
- Libel/Defamation
- Other Negligence
- Other Non-Personal Injury Tort
- Personal Injury Torts**
- Assault/Battery
- Auto Negligence
- Domestic Tort
- Medical Malpractice
- Other Negligence
- Other Personal Injury Tort
- Product Liability
- Property Negligence

Statutory Actions

- Freedom of Access
- Other Statutory Action
- Unfair Trade Practice
- Miscellaneous Civil**
- Administrative Warrant
- Appointment of Receiver
- Arbitration Awards
- Common Law Habeas Corpus
- Debt Collection
- Brought by a debt collector as defined by 32 M.R.S. § 11002
- Drug Forfeiture
- Foreign Deposition
- Foreign Judgments
- HIV Testing
- Land Use Enforcement (80K)
- Minor Settlements
- Other Civil
- Other Forfeiture/Property Libel
- Pre-Action Discovery
- Prisoners Transfers
- Shareholders' Derivative Action

REAL ESTATE

- Foreclosures**
- Foreclosure (ADR exempt)
- Foreclosure (Diversion eligible)
- Foreclosure (Other)
- Title Actions**
- Boundary
- Easement
- Eminent Domain
- Quiet Title
- Miscellaneous Real Estate**
- Abandoned Road
- Adverse Possession
- Equitable Remedy
- Mechanics Lien
- Nuisance
- Other Real Estate
- Partition
- Trespass

APPEALS (ADR EXEMPT)

- Administrative Agency (80C)
- Governmental Body (80B)
- Other Appeal

CHILD PROTECTIVE CUSTODY

- Non-DHHS Protective Custody

SPECIAL ACTIONS

- Money Judgment Disclosure

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MAINE JUDICIAL BRANCH

V. M.R. Civ. P. 16B ALTERNATIVE DISPUTE RESOLUTION (ADR)

I certify that pursuant to M.R. Civ. P. 16B(b), this case is exempt from a required ADR process because ("X" one box below):

It falls within an exemption listed above (it is an appeal or an action for non-payment of a note in a secured transaction).

The plaintiff or defendant is incarcerated in a local, state, or federal facility.

The parties have participated in a statutory pre-litigation screening panel process with (name of panel chair) \_\_\_\_\_ that concluded on (date of panel finding - mm/dd/yyyy) \_\_\_\_\_.

The parties have participated in a formal ADR process with (name of neutral) \_\_\_\_\_ on (date - mm/dd/yyyy) \_\_\_\_\_.

The plaintiff's likely damages will not exceed \$30,000, and the plaintiff requests an exemption.

The action does not include ADR pursuant to M.R. Civ. P. 16(a)(1).

There is other good cause for an exemption and the plaintiff has filed a motion for exemption.

VI. PARTY AND ATTORNEY CONTACT INFORMATION

If you need additional space, list additional parties on an attachment and note "see attachment" in the appropriate section.

Please note: If a party is a government agency, use the full agency name or the standard abbreviation. If the party is an official within a government agency, identify the agency first and then the official, giving both name and title.

(a) PLAINTIFF(S)

("X" the box below to indicate the party type associated with the filing)

Plaintiff(s)

Third-Party Plaintiff(s)

Counterclaim Plaintiff(s)

Cross-Claim Plaintiff(s)

Is the plaintiff a prisoner in a local, state, or federal facility?  Yes  No

Name (first, middle initial, last): Donald J. Trump

Mailing address (include county): Palm Beach, Florida

Telephone: \_\_\_\_\_

Email: \_\_\_\_\_

Name (first, middle initial, last): \_\_\_\_\_

Mailing address (include county): \_\_\_\_\_

Telephone: \_\_\_\_\_

Email: \_\_\_\_\_

(b) ATTORNEY(S) FOR PLAINTIFF(S)

If there are multiple attorneys, indicate the lead attorney. If all counsel do not represent ALL plaintiffs, specify which plaintiff(s) the listed attorney(s) represents.

Name and bar number: Bruce W. Hepler - Bar No. 8007 - Lead Attorney

Firm name: Law Office of Bruce W. Hepler, LLC

Mailing Address: 75 Pearl St.

Portland, ME 04101

Telephone: (207) 772-2525

Email: brucehepler1@gmail.com

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MAINE JUDICIAL BRANCH

Name and bar number:	<u>Benjamin E. Hartwell - Bar No. 6619</u>	<u>Scott Gessler - CO Bar No. 28944</u>
Firm name:	<u>Law Office of Bruce W. Hepler, LLC</u>	<u>Gessler Blue, LLC</u>
Mailing Address:	<u>75 Pearl St.</u>	<u>7350 E. Progress Place, Ste. 100</u>
	<u>Portland, ME 04101</u>	<u>Greenwood Village, CO 80111</u>
Telephone:	<u>(207) 699-0050</u>	<u>(720) 839-6637</u>
Email:	<u>ben.hartwell.law@gmail.com</u>	<u>sgessler@gesslerblue.com</u>

(c) DEFENDANT(S)

("X" the box below to indicate the party type associated with the filing)

- Defendant(s)
- Third-Party Defendant(s)
- Counterclaim Defendant(s)
- Cross-Claim Defendant(s)

Is the defendant a prisoner in a local, state, or federal facility?  Yes  No

Name (first, middle initial, last): Shenna Bellows, in her official capacity as Secretar of State, State of Maine  
Mailing address (include county): Office of the Secretary of State  
148 State House Station  
Telephone: \_\_\_\_\_  
Email: sos.office@maine.gov

Name (first, middle initial, last): \_\_\_\_\_  
Mailing address (include county): \_\_\_\_\_  
Telephone: \_\_\_\_\_  
Email: \_\_\_\_\_

(d) ATTORNEY(S) FOR DEFENDANT(S)

If there are multiple attorneys, indicate the lead attorney. If all counsel do not represent ALL defendants, specify which defendant(s) the listed attorney(s) represents.

Name and bar number: Thomas Knowlton, Deputy Attorney General  
Firm name: Office of the Maine Attorney General  
Mailing Address: 6 State House Station  
Augusta, ME 04333  
Telephone: \_\_\_\_\_  
Email: Thomas.A.Knowlton@maine.gov

Name and bar number: Jason Anton, Assistant Attorney General  
Firm name: Office of the Maine Attorney General  
Mailing Address: 6 State House Station  
Augusta, ME 04333  
Telephone: \_\_\_\_\_  
Email: jason.anton@maine.gov

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MAINE JUDICIAL BRANCH

Name and bar number: Ronald Coleman, NY Bar No. 2288835  
 Firm name: Dhillon Law Group, Inc.  
 Mailing Address: 256 5th Ave., 4th Floor  
New York, NY 10001  
 Telephone: (646) 358-8082  
 Email: rcoleman@dhillonlaw.com

(c) DEFENDANT(S)

("X" the box below to indicate the party type associated with the filing)

- Defendant(s)
- Third-Party Defendant(s)
- Counterclaim Defendant(s)
- Cross-Claim Defendant(s)

Is the defendant a prisoner in a local, state, or federal facility?  Yes  No

Name (first, middle initial, last): \_\_\_\_\_  
 Mailing address (include county): \_\_\_\_\_  
 Telephone: \_\_\_\_\_  
 Email: \_\_\_\_\_

Name (first, middle initial, last): \_\_\_\_\_  
 Mailing address (include county): \_\_\_\_\_  
 Telephone: \_\_\_\_\_  
 Email: \_\_\_\_\_

(d) ATTORNEY(S) FOR DEFENDANT(S)

If there are multiple attorneys, indicate the lead attorney. If all counsel do not represent ALL defendants, specify which defendant(s) the listed attorney(s) represents.

Name and bar number: \_\_\_\_\_  
 Firm name: \_\_\_\_\_  
 Mailing Address: \_\_\_\_\_  
 Telephone: \_\_\_\_\_  
 Email: \_\_\_\_\_

Name and bar number: \_\_\_\_\_  
 Firm name: \_\_\_\_\_  
 Mailing Address: \_\_\_\_\_  
 Telephone: \_\_\_\_\_  
 Email: \_\_\_\_\_

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MAINE JUDICIAL BRANCH

Name and bar number: Gary Lawkowski, VA Bar No.82329 DC Bar No. 1781747  
 Firm name: Dhillon Law Group, Inc.  
 Mailing Address: 2121 Eisenhower Ave., Ste. 608  
Alexandria, VA 22314  
 Telephone: (703) 574-1654  
 Email: glawkowski@dhillonlaw.com

(c) DEFENDANT(S)

("X" the box below to indicate the party type associated with the filing)

- Defendant(s)
- Third-Party Defendant(s)
- Counterclaim Defendant(s)
- Cross-Claim Defendant(s)

Is the defendant a prisoner in a local, state, or federal facility?  Yes  No

Name (first, middle initial, last): \_\_\_\_\_  
 Mailing address (include county): \_\_\_\_\_  
 Telephone: \_\_\_\_\_  
 Email: \_\_\_\_\_

Name (first, middle initial, last): \_\_\_\_\_  
 Mailing address (include county): \_\_\_\_\_  
 Telephone: \_\_\_\_\_  
 Email: \_\_\_\_\_

(d) ATTORNEY(S) FOR DEFENDANT(S)

If there are multiple attorneys, indicate the lead attorney. If all counsel do not represent ALL defendants, specify which defendant(s) the listed attorney(s) represents.

Name and bar number: \_\_\_\_\_  
 Firm name: \_\_\_\_\_  
 Mailing Address: \_\_\_\_\_  
 Telephone: \_\_\_\_\_  
 Email: \_\_\_\_\_

Name and bar number: \_\_\_\_\_  
 Firm name: \_\_\_\_\_  
 Mailing Address: \_\_\_\_\_  
 Telephone: \_\_\_\_\_  
 Email: \_\_\_\_\_

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MAINE JUDICIAL BRANCH

(e) PARTIES IN INTEREST

Name (first, middle initial, last): Attached to the civil cover sheet is a list identifying all persons and entities that were parties to the underlying action. They are not parties to the appeal, but are required to be served.

Mailing address (include county):

Telephone:

Email:

Name (first, middle initial, last):

Mailing address (include county):

Telephone:

Email:

(f) ATTORNEY(S)

If there are multiple attorneys, indicate the lead attorney. If all counsel do not represent ALL parties in interest, specify which parties in interest the listed attorney(s) represents.

Name and bar number:

Firm name:

Mailing Address:

Telephone:

Email:

Name and bar number:

Firm name:

Mailing Address:

Telephone:

Email:

VII. RELATED CASE(S) IF ANY

Case name:

Docket Number:

Assigned Judge/Justice:

Date (mm/dd/yyyy): 01/02/2024

[Signature]

Signature of Plaintiff or Lead Attorney of Record

Bruce W. Hepler - Bar No. 8007

Printed Name of Plaintiff or Attorney

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Parties to the underlying matter

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Professor Mark A. Graber  
c/o Jeffrey Neil Young, Esq.  
Solidarity Law, PLLC  
9 Longmeadow Rd.  
Cumberland Foreside, ME 04110



STATE OF MAINE  
KENNEBEC, ss

SUPERIOR COURT  
CIVIL ACTION  
DOCKET NO. \_\_\_\_\_

**DONALD J. TRUMP,**

*Petitioner,*

v.

**SHENNA BELLOWS, in her official  
capacity as Secretary of State, State of  
Maine,**

*Respondent.*

**COMPLAINT**  
(Petition for Review of  
Final Agency Action  
Pursuant to M.R. 80C)

### INTRODUCTION

Under Maine Rule of Civil Procedure 80C and 5 M.R.S.A. §§ 11001-11008, Petitioner Donald J. Trump, by and through undersigned counsel, petitions this Court for review of a final order issued by Respondent Secretary of State Shenna Bellows (the *Secretary's Ruling*). A copy is attached as **Exhibit 1**.

In response to a challenge brought under 21-A.M.R.S. §§ 336 or 337, on December 28, 2023, Maine Secretary of State Bellows struck President Trump from the Republican Party's state presidential primary ballot, ruling that he is allegedly ineligible to be President of the United States under Section Three of the Fourteenth Amendment of the United States Constitution. President Trump is aggrieved by that final order because: (1) the Secretary was a biased decisionmaker who should have recused herself and otherwise failed to provide lawful due

process; (2) the Secretary had no legal authority under 21-A M.R.S. §§ 336 or 337 or any other Maine statute to consider the federal constitutional issues presented by the Challengers; (3) the Secretary made multiple errors of law and acted in an arbitrary and capricious manner; and (4) President Trump will be illegally excluded from the ballot as a result of the Secretary's actions. In support of this *Petition*, President Trump states as follows:

### **PERSON SEEKING REVIEW**

1. The person seeking review, as Petitioner, is Donald J. Trump ("President Trump"), 45th President of the United States, a resident of the State of Florida. President Trump is a candidate for President of the United States of America.

2. Respondent Shenna Bellows ("Secretary Bellows" or "The Secretary") is Secretary of State of the State of Maine. The Secretary's office is located at 148 State House Station, Augusta, Maine 04333-0148.

### **MANNER IN WHICH PETITIONER IS AGGRIEVED**

3. Presidential primary ballot access in Maine is governed by 21-A M.R.S. § 331 *et seq.* and by 21-A M.R.S. § 442 *et seq.*

4. For placement on Maine's presidential primary ballot, candidates for President of the United States must submit petitions containing a certain number of signatures. 21-A M.R.S. § 335. It is undisputed that President Trump submitted a petition containing the requisite number of valid signatures.

5. In addition, 21-A M.R.S. § 336 also requires a presidential candidate to file a consent as follows:

#### **§336. Consent of candidate to be filed**

The written consent of each candidate must be filed either with that candidate's primary petition or at any earlier time during which signatures may be collected under section 335 or, if applicable, subchapter 8.

1. Consent. The consent must contain a statement signed by the candidate that the candidate will accept the nomination of the primary election. The Secretary of State shall provide a form on which the consent of the candidate is made that must include a list of the statutory and constitutional requirements of the office sought by the candidate. The statement may be printed as a part of the primary petition.

2. Single filing sufficient. A candidate need file only one consent. This consent is valid even though it may be part of a primary petition which is void.

3. Residence and party declared. The consent must contain a declaration of the candidate's place of residence and party designation and a statement that the candidate meets the qualifications of the office the candidate seeks, which the candidate must verify by oath or affirmation before a notary public or other person authorized by law to administer oaths or affirmations that the declaration is true. If, pursuant to the challenge procedures in section 337, any part of the declaration is found to be false by the Secretary of State, the consent and the primary petition are void. Upon written request by the candidate to the Secretary of State, the Secretary of State may treat the candidate's street name and number as confidential as long as the street name and number are not material to the candidate's qualifications to serve.

6. As required by section 336(1), the Secretary printed a consent form, which is reproduced below:



8. By submitting his petition and consent as required by the statute, President Trump has met all requirements set forth by the Maine Legislature in the statute and is entitled to be placed on the Republican primary ballot.

9. Nonetheless, in the *Secretary's Ruling*, the Secretary wrongfully denied President Trump a place on the Republican primary ballot.

#### **FINAL AGENCY ACTION TO BE REVIEWED**

10. The final agency action to be reviewed is the *Secretary's Ruling*, dated December 28, 2023, which President Trump received on December 28, 2023.

#### **NATURE OF THE ACTION TO BE REVIEWED**

11. The nature of the action to be reviewed is the *Secretary's Ruling* in which the Secretary disqualified President Trump from the presidential primary ballot.

#### **GROUND S UPON WHICH RELIEF IS SOUGHT**

12. Relief is sought on the grounds that the *Secretary's Ruling* was the product of a process infected by bias and pervasive lack of due process; is arbitrary, capricious, and characterized by abuse of discretion; affected by error of law; *ultra vires*; and unsupported by substantial evidence on the record, as follows:

13. The Secretary should have recused herself due to her bias against President Trump, as demonstrated by a documented history of prior statements prejudging the issue presented.

14. The Secretary denied President Trump due process by failing to give him adequate time and opportunity to present a defense.

15. The Secretary lacked statutory authority to hear the challenges directed to President Trump's supposed disqualification under to Section Three of the Fourteenth

Amendment. Section 337 provides only a method for challenging petitions. Section 336 borrows its procedures from section 337, but the only ground section 336 allows for a challenge is whether “any part of the *declaration* is found to be false by the Secretary of State....” (Emphasis supplied). Specifically, section 336(3) provides that “[t]he consent must contain a *declaration* of the candidate’s place of residence and party designation and a *statement* that the candidate meets the qualifications of the office the candidate seeks, which the candidate must verify by oath or affirmation....” (Emphasis added.) The statute thus distinguishes the “declaration” from the “statement” and limits challenges under section 336 to the falsity of the “declaration,” which includes only “the candidate’s place of residence and party designation.” No challenge was made to President Trump’s place of residence or party designation. Accordingly, the Secretary had no statutory authority to consider any challenge to President Trump’s qualifications under section 336, as those are not part of the declaration.

16. Even if the Secretary could consider challenges to the *statement* portion of the consent, any challenge is limited to the plain text of the form promulgated by the Secretary. The form requires a candidate to state “that I meet the qualifications to hold this office as listed above.” Immediately above the statement is a list of three “Qualifications of President of the United States,” none of which identifies, involves, or refers to Section Three of the Fourteenth Amendment. The limited scope of the statement means that any claim that Section Three of the Fourteenth Amendment disqualifies President Trump has no bearing on the truth or falsity of anything on the statement portion of the consent form—much less on the declaration. Accordingly, the Secretary had no statutory authority to consider the challenges raised under Section Three of the Fourteenth Amendment.

17. By exceeding the limited scope provided for challenges by Maine’s Legislature, the Secretary has violated the Constitution’s Elector’s Clause, which requires states to appoint presidential electors “in such Manner as the *Legislature* thereof may direct.” U.S. Const. art. II, § 1, ¶ 2. (Emphasis supplied).

18. Because President Trump’s sworn statement, in the form provided by the Secretary, was factually true, it was an error of law, arbitrary and capricious, and an abuse of discretion for her to find it false.

19. All of the evidence on which the Secretary purported to rely was irrelevant to any issue properly before her.

20. The Secretary abused her discretion by considering and relying upon untrustworthy evidence.

21. Even if Maine law authorized the Secretary to consider challenges to President Trump’s candidacy under Section Three of the Fourteenth Amendment (which it did not), The Secretary could not properly have considered Section Three and erred as a matter of law in doing so, for the further reasons that:

a. Disqualification of a presidential candidate under Section Three of the Fourteenth Amendment presents a political question reserved for the Electoral College and Congress;

b. Section Three of the Fourteenth Amendment is not self-executing and requires congressional legislation—of which there presently is none—to give it effect, leaving no role for state officials to play in its enforcement. *See In re Griffin*, 11 F. Cas. 7 (C.C.D. Va. 1869) (No. 5,815) (Chase, C.J.) (holding that section 3’s disqualifications cannot attach absent congressional action);

c. Section Three of the Fourteenth Amendment bars persons otherwise subject to its disqualification from *holding* specified offices, not from running for them or from being elected to them. By barring President Trump from the ballot, the Secretary unlawfully violated the holding of *U.S. Term Limits, Inc. v. Thornton*, 514 U.S. 779 (1995), by altering or modifying the Constitution’s qualifications for federal office;

d. Section Three of the Fourteenth Amendment does not apply to President Trump because he has never served as an “officer of the United States,” and has never taken an “oath to support the Constitution”;

e. Section Three of the Fourteenth Amendment does not apply to bar candidates from the presidency because that position is not an “office under the United States”;

f. President Trump did not “engage” in “insurrection”; and

g. As evidence of President Trump’s conduct, the Secretary relied entirely on President Trump’s public speeches. These speeches did not incite insurrection, and therefore President Trump’s political speech was protected by the First Amendment.

### **DEMAND FOR RELIEF**

FOR THESE REASONS, the President Trump prays that this Court enter an Order to:

a. Vacate the *Secretary’s Ruling*;

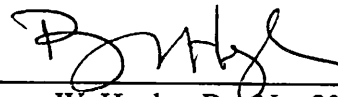
b. Declare that the Secretary has no jurisdiction or authority to continue, maintain, or begin any further proceedings concerning President Trump’s alleged disqualification as a candidate for President under Section Three of the Fourteenth Amendment;



- c. Require the Secretary to immediately place President Trump on the Republican presidential primary ballot; and
- d. Grant Petitioner such other further relief as the Court deems just and equitable.

Respectfully submitted this 2nd day of January 2024,

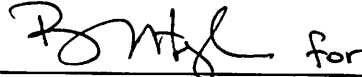
THE LAW OFFICES OF BRUCE W. HEPLER, LLC



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Bruce W. Hepler, Bar No. 8007  
Benjamin E. Hartwell, Bar No. 6619  
75 Pearl Street, ste. 201  
Portland, ME 04101  
(207) 772-2525 Tel.  
brucehepler1@gmail.com  
ben.hartwell.law@gmail.com

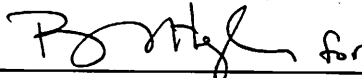
GESSLER BLUE LLC



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Scott E. Gessler, CO Bar No. 28944  
7350 E. Progress Place, Ste. 100  
Greenwood Village, CO 80111  
(720) 839-6637 Tel.  
sgessler@gesslerblue.com  
*Pro Hac Vice Admission Pending*

DHILLON LAW GROUP, INC.



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Gary M. Lawkowski, VA Bar No. 82329  
DC Bar No. 1781747  
2121 Eisenhower Avenue, Suite 608  
Alexandria, VA, 22314  
(703) 574-1654 Tel.  
glawkowski@dhillonlaw.com  
*Pro Hac Vice Admission Pending*

## Certificate of Service

I certify that on this 2<sup>nd</sup> day of January 2024, the foregoing was served via Certified Mail, Return Receipt Requested and a courtesy copy via email on all parties and their counsel of record:

Office of the Secretary  
Attn: Shenna Bellows, Secretary of State  
148 State House Station  
Augusta, ME 04333-0148  
sos.office@maine.gov

Office of the Maine Attorney General  
Attn: Jason Anton, Assistant Attorney  
General  
6 State House Station  
Augusta, ME 04333  
jason.anton@maine.gov

Kimberley Rosen, Thomas Saviello, and Ethan  
Strimling  
c/o Benjamin Gaines, Esq.  
PO Box 1023  
Brunswick, ME 04011  
ben@gaines-law.com

Clayton Henson  
7341 Patch Court  
Canal Winchester, OH 43110  
Clayton.henson@djtfp24.com

Paul Gordon  
16 Taylor St.  
Portland, ME 04102  
PaulGordonMaine@gmail.com

Demi Kouzounas  
361 Seaside Ave.  
Saco, ME 04072  
demiforme@gmail.com

Mary Anne Royal  
141 Lebanon Road  
Winterport, ME 04496  
Kayakmomma3@gmail.com

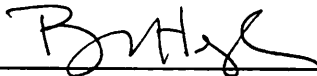
I certify that on this 2<sup>nd</sup> day of January 2024, the foregoing was served via Certified Mail, Return Receipt Requested and a courtesy copy via email the Intervenor and their counsel of record:

Michael Soboleski  
11 Snowy Ridge Road  
Philips, ME 04966  
michael.soboleski@legislature.maine.gov

Counsel for Citizens for Responsibility and Ethics  
in Washington  
1331 F Street NW, Ste. 900  
Washington, DC 20004  
jmaier@citizensforethics.org

c/o Amy Dieterich, Esq.  
Skelton Tantor & Abbott  
500 Canal Street  
Lewiston, ME 04240  
adietrich@sta-law.com

Professor Mark A. Graber  
c/o Jeffrey Neil Young, Esq.  
Solidarity Law, PLLC  
9 Longmeadow Rd.  
Cumberland Foreside, ME 04110

By:   
Bruce W. Hepler Esq.  
Law Offices of Bruce Hepler, LLC  
75 Pearl Street  
Portland, ME 04101  
(207) 772-2525  
brucehepler1@gmail.com

STATE OF MAINE  
KENNEBEC, ss

**SUPERIOR COURT**  
CIVIL ACTION  
DOCKET NO. \_\_\_\_\_

**DONALD J. TRUMP,**

*Petitioner,*

v.

**SHENNA BELLOWS, in her official  
capacity as Secretary of State, State of  
Maine,**

*Respondent.*

**BRIEFING SCHEDULE**

On January 2, 2024, attorneys for President Trump and Secretary of State Shenna Bellows conferred in this matter and jointly propose the following briefing schedule for the Court's consideration:

Transmit record: Thursday, January 4, 2024;

Opening Brief: Friday, January 5, 2024;

Response Brief: Wednesday, January 10, 2024;

Reply Brief: Friday, January 12, 2024;

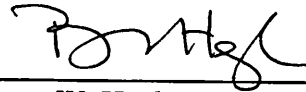
Oral Argument (at the Court's discretion); January 16, 2024.

The parties will serve copies of all pleadings and other papers on one another by email (on the same day as the filing deadline) pursuant to M.R. Civ. P. 5. Due to the compressed timeframe for this matter, the parties also request permission to submit electronic copies of all

pleadings and other papers to the Court by the filing deadline, promptly followed by hard copies delivered the next business day.

Respectfully submitted this 2nd day of January 2024,

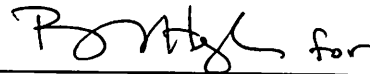
THE LAW OFFICES OF BRUCE W. HEPLER, LLC



---

Bruce W. Hepler, Bar No. 8007  
Benjamin E. Hartwell, Bar No. 6619  
75 Pearl Street, ste. 201  
Portland, ME 04101  
(207) 772-2525 Tel.  
brucehepler1@gmail.com  
ben.hartwell.law@gmail.com

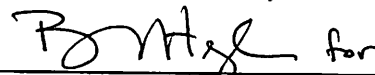
GESSLER BLUE LLC



---

Scott E. Gessler, CO Bar No. 28944  
7350 E. Progress Place, Ste. 100  
Greenwood Village, CO 80111  
(720) 839-6637 Tel.  
sgessler@gesslerblue.com  
*Pro Hac Vice Admission Pending*

DHILLON LAW GROUP, INC.



---

Gary M. Lawkowski, VA Bar No. 82329  
DC Bar No. 1781747  
2121 Eisenhower Avenue, Suite 608  
Alexandria, VA, 22314  
(703) 574-1654 Tel.  
glawkowski@dhillonlaw.com  
*Pro Hac Vice Admission Pending*

STATE OF MAINE  
KENNEBEC COUNTY, ss.

SUPERIOR COURT  
Civil Action  
Docket No. \_\_\_\_\_

**DONALD J. TRUMP,**

*Petitioner,*

v.

**SHENNA BELLOWS, in her  
official capacity as Secretary of  
State, State of Maine,**

*Respondent.*

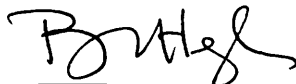
**EMERGENCY MOTION FOR  
ADMISSION OF VISITING COUNSEL  
PRO HAC VICE  
SCOTT GESSLER, ESQ.  
(M.R. Civ.P. 89(b); 4 M.R.S. § 802)**

NOW COMES Petitioner Donald J. Trump, by and through counsel, and moves for the admission of visiting counsel, pursuant to Maine Rule of Civil Procedure 89(b) and 4 M.R.S. § 802, as follows:

1. Petitioner Donald J. Trump presented a primary election petition to the Secretary of State for review pursuant to 21-A M.R.S. § 337.
2. Three challenges were filed against Mr. Trump's petition.
3. On December 11, 2023, the Secretary of State provided notice of a public hearing on December 15, 2023, relating to the challenges of Mr. Trump's petition.
4. Secretary of State Bellows permitted Scott Gessler to participate in the hearing pursuant to Maine Rules of Professional Conduct, Rule 5.5, cmt. 9.
5. On December 28, 2023, Secretary of State Bellows, as a result of the December 15, 2023 hearing, found against Petitioner, necessitating the need for Petitioner to appeal the Secretary's decision, pursuant to Maine Rules of Civil Procedure, Rule 80C.

6. The Petitioner only has five days to appeal the Secretary's decision. See 21-A M.R.S. § 337(2)(D).
7. It is necessary to have counsel from another jurisdiction, who participated in the underlying hearing, continue to participate in the appeal process.
8. Due to the extremely tight timeline as required by statute, it is necessary to rule on this motion in an expedited manner. See 21-A M.R.S. § 337(2)(D).
9. Undersigned counsel Bruce Hepler and Benjamin Hartwell are attorneys admitted to the Maine Bar in good standing.
10. Undersigned counsel is actively associated with Scott Gesler, Esq. of Gessler Blue, LLC, in the above captioned matter. Gessler Blue, LLC is at 7350 E. Progress Place, Ste. 100, Greenwood Village, CO.
11. Scott Gesler, Esq. has practiced law since he became a member of the Illinois bar in 1990 and is currently a member in good standing of the Colorado bar (Bar No. 28944). See Ex. 1. Scott Gesler, Esq. is an inactive member of the Illinois bar and Washington DC bar. See Exhibit 1, 2.
12. Scott Gesler, Esq.'s *pro hac vice* admission is for the hearing in the above captioned matter pursuant to 21-A M.R.S. § 337 and M.R. Civ.P. 80C.
13. Undersigned counsel moves for the admission of Scott Gesler, Esq. as a visiting attorney to work in association with the undersigned counsel in this matter.

Respectfully submitted,



Bruce W. Hepler, Bar No. 8007

Benjamin E. Hartwell, Bar No. 6619

Attorneys for Petitioner President Donald J. Trump

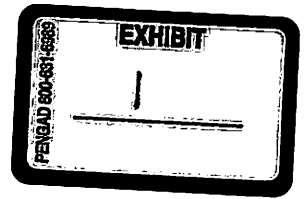
Dated: January 2, 2024.

Law Offices of Bruce W. Hepler  
75 Pearl Street, Suite 201  
Portland, Maine 04101  
tele: (207) 699-0050  
ben.hartwell.law@gmail.com


**NOTICE**

**ALL MATTERS IN OPPOSITION TO THIS MOTION MUST BE FILED NOT LESS THAN 21 DAYS AFTER THE FILING OF THIS MOTION UNLESS ANOTHER TIME IS PROVIDED BY THE MAINE RULES OF CIVIL PROCEDURE OR SET BY THE COURT. FURTHER, FAILURE TO FILE A TIMELY OPPOSITION WILL BE DEEMED A WAIVER OF ALL OBJECTIONS TO THIS MOTION, AND THIS MOTION MAY THEN BE GRANTED WITHOUT FURTHER NOTICE OR HEARING.**





# SUPREME COURT



## State of Colorado

STATE OF COLORADO, ss:

I, Cheryl Stevens, Clerk of the Supreme Court of the State of Colorado, do hereby certify that

SCOTT ERIC GESSLER

has been duly licensed and admitted to practice as an

*ATTORNEY AND COUNSELOR AT LAW*

within this State; and that his/her name appears upon the Roll of Attorneys

and Counselors at Law in my office of date the 24<sup>th</sup>

day of October A.D. 1997 and that at the date

hereof the said SCOTT ERIC GESSLER is in good standing

at this Bar.



IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

30<sup>th</sup> day of November A.D. 2023

Cheryl Stevens

Clerk

By

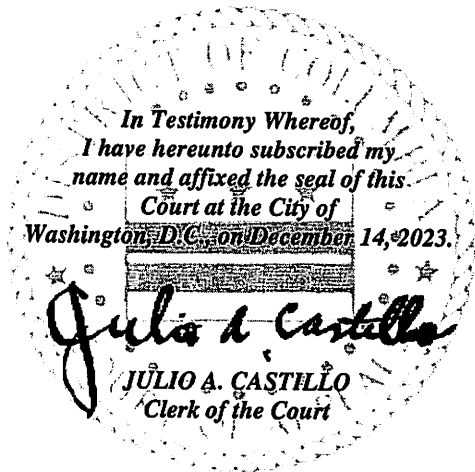
Deputy Clerk



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,  
the District of Columbia Bar does hereby certify that

### Scott E Gessler

was duly qualified and admitted on December 7, 1992 as an attorney and counselor entitled to  
practice before this Court; and is, on the date indicated below, an Inactive member in good  
standing of this Bar.



Issued By:

David Chu - Director, Membership  
District of Columbia Bar Membership

For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email  
memberservices@dcbbar.org.

STATE OF MAINE  
KENNEBEC COUNTY, ss.

SUPERIOR COURT  
Civil Action  
Docket No. \_\_\_\_\_

DONALD J. TRUMP,

*Petitioner,*

v.

SHENNA BELLOWS, *in her  
official capacity as Secretary of  
State, State of Maine,*

*Respondent.*

**ORDER  
ON EMERGENCY MOTION FOR  
ADMISSION OF VISITING COUNSEL  
PRO HAC VICE  
SCOTT GESSLER, ESQ  
(M.R. Civ.P. 89(b); 4 M.R.S. § 802)**

After consideration of Petitioner's **EMERGENCY MOTION FOR ADMISSION OF VISITING COUNSEL, PRO HAC VICE**, the court hereby admits **Scott Gesler, Esq.** as a visiting attorney to work in association with Bruce W. Hepler, Esq. and Benjamin E. Hartwell, Esq. in this matter. The Motion is hereby **GRANTED**.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Justice, Maine Superior Court

**STATE OF MAINE  
KENNEBEC COUNTY, ss.**

**SUPERIOR COURT  
Civil Action  
Docket No. \_\_\_\_\_**

**DONALD J. TRUMP,**

*Petitioner,*

v.

**SHENNA BELLOWS, in her  
official capacity as Secretary of  
State, State of Maine,**

*Respondent.*


**EMERGENCY MOTION FOR  
ADMISSION OF VISITING COUNSEL  
*PRO HAC VICE*  
RONALD COLEMAN, ESQ.  
(M.R. Civ.P. 89(b); 4 M.R.S. § 802)**

NOW COMES Petitioner Donald J. Trump, by and through counsel, and moves for the admission of visiting counsel, pursuant to Maine Rule of Civil Procedure 89(b) and 4 M.R.S. § 802, as follows:

1. Petitioner Donald J. Trump presented a primary election petition to the Secretary of State for review pursuant to 21-A M.R.S. § 337.
2. Three challenges were filed against Mr. Trump's petition.
3. On December 11, 2023, the Secretary of State provided notice of a public hearing on December 15, 2023, relating to the challenges of Mr. Trump's petition.
4. Secretary of State Bellows permitted Ronald Coleman to participate in the hearing pursuant to Maine Rules of Professional Conduct, Rule 5.5, cmt. 9.
5. On December 28, 2023, Secretary of State Bellows, as a result of the December 15, 2023 hearing, found against Petitioner, necessitating the need for Petitioner to appeal the Secretary's decision, pursuant to Maine Rules of Civil Procedure, Rule 80C.

6. The Petitioner only has five days to appeal the Secretary's decision. See 21-A M.R.S. § 337(2)(D).
7. It is necessary to have counsel from another jurisdiction, who participated in the underlying hearing, continue to participate in the appeal process.
8. Due to the extremely tight timeline as required by statute, it is necessary to rule on this motion in an expedited manner. See 21-A M.R.S. § 337(2)(D).
9. Undersigned counsel Bruce Hepler and Benjamin Hartwell are attorneys admitted to the Maine Bar in good standing.
10. Undersigned counsel is actively associated with Dhillon Law Group, Inc., in the above captioned matter. Dhillon Law Group, Inc. is at 50 Park Place, Suite 1105, Newark, NJ 07102.
11. Ronald Coleman has practiced law since he became a member of the New York bar in 1989 and is currently a member in good standing of the New York Bar (Bar No. 2288835). See Ex. 1.
12. Ronald Coleman *pro hac vice* admission is for the hearing in the above captioned matter pursuant to 21-A M.R.S. § 337 and M.R. Civ.P. 80C.
13. Undersigned counsel moves for the admission of Ronald Coleman as a visiting attorney to work in association with the undersigned counsel in this matter.

Respectfully submitted,



\_\_\_\_\_  
Bruce W. Hepler, Bar No. 8007  
Benjamin E. Hartwell, Bar No. 6619  
Attorneys for Petitioner President Donald J. Trump

Dated: January 2, 2024.

Law Offices of Bruce W. Hepler  
75 Pearl Street, Suite 201

Portland, Maine 04101  
tele: (207) 699-0050  
ben.hartwell.law@gmail.com

**NOTICE**

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*Appellate Division of the Supreme Court  
of the State of New York  
First Judicial Department*

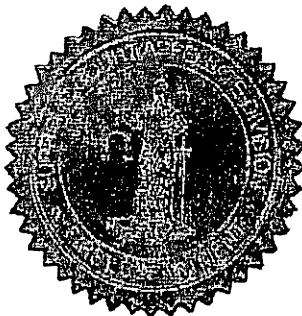
---

*I, Susanna M. Rojas, Clerk of the Appellate Division of the  
Supreme Court of the State of New York, First Judicial  
Department, do hereby certify that*

*Ronald David Coleman*

*was duly licensed and admitted to practice as an Attorney and  
Counselor at Law in all the courts of this State on **August 7, 1989**,  
has duly taken and subscribed the oath of office prescribed by law,  
has been enrolled in the Roll of Attorneys and Counselors at Law  
on file in this office, is duly registered with the Office of Court  
Administration, and according to the records of this Court is  
currently in good standing as an Attorney and Counselor-at-Law.*

*In Witness Whereof, I have hereunto set  
my hand in the City of New York on  
December 29, 2023.*



*Susanna M. Rojas*

*Clerk of the Court*



Supreme Court of the State of New York  
Appellate Division, First Department

DIANNE T. RENWICK  
PRESIDING JUSTICE

SUSANNA MOLINA ROJAS  
CLERK OF THE COURT

MARGARET SOWAH  
DEPUTY CLERK OF THE COURT

DOUGLAS C. SULLIVAN  
DEPUTY CLERK OF THE COURT

To Whom It May Concern

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on the website of the Unified Court System.

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the Attorney Grievance Committee of the First Judicial Department.

Bar examination history is available from the New York State Board of Law Examiners.

Instructions, forms and links are available on this Court's website.

Susanna Rojas  
Clerk of the Court

Revised October 2020



STATE OF MAINE  
KENNEBEC COUNTY, ss.

SUPERIOR COURT  
Civil Action  
Docket No. \_\_\_\_\_

DONALD J. TRUMP,

*Petitioner,*

v.

SHENNA BELLOWS, *in her  
official capacity as Secretary of  
State, State of Maine,*

*Respondent.*

**ORDER  
ON EMERGENCY MOTION FOR  
ADMISSION OF VISITING COUNSEL  
PRO HAC VICE  
RONALD COLEMAN, ESQ  
(M.R. Civ.P. 89(b); 4 M.R.S. § 802)**

After consideration of Petitioner's **EMERGENCY MOTION FOR ADMISSION OF VISITING COUNSEL, PRO HAC VICE**, the court hereby admits **Ronald Coleman** as a visiting attorney to work in association with Bruce W. Hepler, Esq. and Benjamin E. Hartwell, Esq. in this matter. The Motion is hereby **GRANTED**.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Justice, Maine Superior Court

**STATE OF MAINE  
KENNEBEC COUNTY, ss.**

**SUPERIOR COURT  
Civil Action  
Docket No. \_\_\_\_\_**

**DONALD J. TRUMP,**

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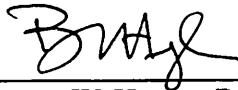
**EMERGENCY MOTION FOR  
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*PRO HAC VICE*  
GARY LAWKOWSKI, ESQ.  
(M.R. Civ.P. 89(b); 4 M.R.S. § 802)**

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10. Undersigned counsel is actively associated with Dhillon Law Group, Inc., in the above captioned matter. Dhillon Law Group, Inc. is at 2121 Eisenhower Avenue, Ste. 608, Alexandria, VA 22314.
11. Gary Lawkowski has practiced law since he became a member of the District of Columbia bar in 2022 and is currently a member in good standing of the District of Columbia bar (Bar No. 1781747). See Ex. 1.
12. Gary Lawkowski's *pro hac vice* admission is for the hearing in the above captioned matter pursuant to 21-A M.R.S. § 337 and M.R. Civ.P. 80C.
13. Undersigned counsel moves for the admission of Gary Lawkowski as a visiting attorney to work in association with the undersigned counsel in this matter.

Respectfully submitted,



---

Bruce W. Hepler, Bar No. 8007  
Benjamin E. Hartwell, Bar No. 6619  
Attorneys for Petitioner President Donald J. Trump

Dated: January 2, 2024.

Law Offices of Bruce W. Hepler  
75 Pearl Street, Suite 201

Portland, Maine 04101  
tele: (207) 699-0050  
ben.hartwell.law@gmail.com

**NOTICE**

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STATE OF MAINE  
KENNEBEC COUNTY, ss.

SUPERIOR COURT  
Civil Action  
Docket No. \_\_\_\_\_

DONALD J. TRUMP,

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v.

SHENNA BELLOWS, *in her  
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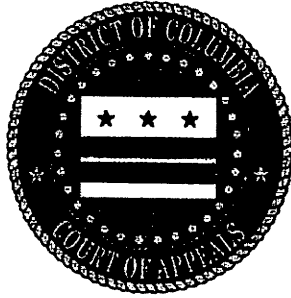
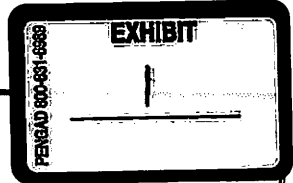
*Respondent.*

**ORDER**  
**ON EMERGENCY MOTION FOR**  
**ADMISSION OF VISITING COUNSEL**  
***PRO HAC VICE***  
**GARY LAWKOWSKI, ESQ**  
**(M.R. Civ.P. 89(b); 4 M.R.S. § 802)**

After consideration of Petitioner's **EMERGENCY MOTION FOR ADMISSION OF VISITING COUNSEL, *PRO HAC VICE***, the court hereby admits Gary Lawkowski as a visiting attorney to work in association with Bruce W. Hepler, Esq. and Benjamin E. Hartwell, Esq. in this matter. The Motion is hereby **GRANTED**.

Dated: \_\_\_\_\_

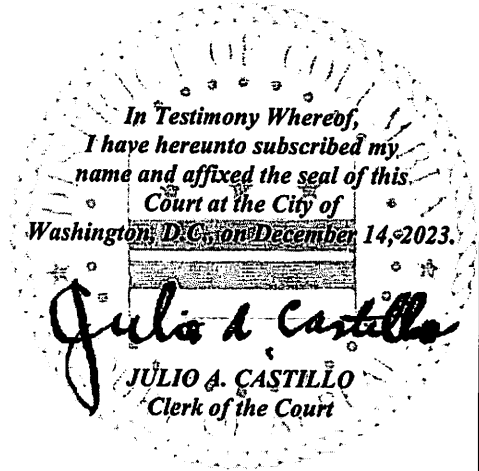
\_\_\_\_\_  
Justice, Maine Superior Court



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,  
the District of Columbia Bar does hereby certify that

## Gary Michael Lawkowski

was duly qualified and admitted on March 29, 2022 as an attorney and counselor entitled to  
practice before this Court; and is, on the date indicated below, an Active member in good  
standing of this Bar.



Issued By:

David Chu - Director, Membership  
District of Columbia Bar Membership

For questions or concerns, please contact the D.C. Bar Membership Office at 202-626-3475 or email  
memberservices@dcb.org.

STATE OF MAINE  
KENNEBEC COUNTY, ss.

SUPERIOR COURT  
Civil Action  
Docket No. \_\_\_\_\_

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Dated: \_\_\_\_\_

\_\_\_\_\_  
Justice, Maine Superior Court