



Office of the County Clerk

Elections Division

Cathy M. Garrett
Wayne County Clerk

May 21, 2024

Shri Thanedar
P.O. Box 21159
Detroit, MI 48221-0159
shri@shriforcongress.com

RE: FINAL DETERMINATION OF NOMINATING PETITIONS FILED BY ADAM HOLLIER

Dear Mr. Thanedar,

This office is in receipt of your challenge to the nominating petitions filed by Adam Hollier for the office of U.S. Representative in Congress 13th District. In your challenge, you allege that the petitions submitted by Candidate Hollier are insufficient due to duplicate signers, unregistered voters, signers registered outside the district, and allegations of petition signature fraud related to certain petition circulators.

This office has concluded the investigation into the challenges you have filed against the nominating petitions submitted by Adam Hollier. The official declaration and determination required under MCL 168.552 is enclosed.

On Thursday, May 16, 2024, this office furnished to the petitioner and candidate the staff report required under MCL 168.552. This office is bound by the statutes and election laws governed by the State of Michigan, MCL 168.542 to 168.556. Under these current laws, below are my findings for each challenge stated in your complaint:

1. Your initial challenge asserts that Candidate Hollier does not meet the minimum signature requirement of at least 1,000 valid and genuine signatures of registered voters within the electoral district.

Determination: Challenge upheld.

A thorough and comprehensive check of the petition signatures against the qualified voter file has been completed of the entire set of petitions filed by Candidate Hollier, not just the signatures identified in your challenge. See the attached Signed signature report which details the number of valid signatures and a number of signatures flagged for various deficiencies.

2. Supplemental Petition pages S2- S10 show striking similarities in handwriting for each line of the petition sheet.

Determination: Challenge upheld.

A review of the handwriting and flourishes within each signature on each line for petitions S2-S10 show the same distinct handwriting and patterns indicative that the same hand fraudulently signed every line of each petition sheet. Petition pages S2-S10 were disqualified for obvious reasons.

Under MCL 168.544c(8)(a), MCL 168.544c(10) and MCL 168.544c(11)(a) which states:

“(8) An individual shall not do any of the following: (a) Sign a petition with a name other than his or her own.

(10) An individual shall not sign a petition with multiple names. An individual who violates this subsection is guilty of a felony.

(11)(a) Disqualify obviously fraudulent signatures on a petition form on which the violation of subsection (8) or (10) occurred, without checking the signatures against local registration records.”

3. You also request in your challenge that based on the forgery as evidence in supplemental petitions S2-S10, that all 66 petition pages circulated by Mr. Londell Thomas be declared null and void and every signature collected by Mr. Londell Thomas be disallowed. Which includes pages 1, 2, 4, 5, 8, 10 – 14, 16 – 20, 22 - 40, 55 – 59, 62, 65, 66, 69 – 81, 89, 97, 98, S2-S10

In Candidate Hollier's response he provided affidavits and supporting documentation that attests to the validity and genuineness of the signatures contained within several petition pages. Even before a response was provided by candidate Hollier, staff was able to verify a great deal of challenged signatures' genuineness and authenticity.

Determination: Challenge Granted in Part/Denied in Part.

Your challenge regarding petition pages 1, 2, 4, 5, 8, 10 – 14, 16 – 20, 22 - 38, 55 – 59, 62, 65, 66, 69 – 80, 89, 97, 98 is denied. The Elections Staff found no indications of fraud within the pages listed. Genuine and valid signers of these petition sheets were not rejected.

Your challenge regarding petition pages 39, 40, 81, S2 – S10 is granted in part/denied in part. (See the STAFF REPORT OF FRAUDULENT NOMINATING PETITIONS

4. Large discrepancies questioning the validity of all the signatures collected by Circulators Londell Thomas, Jasmine Webb and given the large scale of the forgery, we respectfully request that every signature submitted be checked for accuracy and fraud.

Determination: Challenge upheld.

The Elections Division staff reviewed all petition signatures that were not previously disqualified due to fraud. While reviewing the response, in order to rehabilitate any signatures that may have been previously flagged or disqualified, many of the fraudulent signatures were from voters not registered within the 13th Congressional district, or the signatures presented an alert within the petition verification module that the signers name had already been recorded as a valid signature. When duplicate signatures are confirmed, both signatures are discounted from the total number of valid signatures. This is particularly noted because even with the additional review and verification, more signatures were discounted due to the reasons stated above.

In conjunction with the Staff Report issued on Thursday, May 16, 2024, I am adopting the staff's recommendation and hereby determine the nominating petitions are **insufficient** in number to allow candidate Adam Hollier's name to appear on the August 6, 2024 Primary Election ballot for the office of U.S. Representative in Congress – 13th District.

MCL 168.552 (6) states in part:

"A person feeling aggrieved by a determination made by the county clerk may have the determination reviewed by the secretary of state by filing a written request with the secretary of state within 3 days after the official declaration by the county clerk, unless the third day falls on a Saturday, Sunday, or legal holiday, in which case the request may be filed not later than 4 p.m. on the next day that is not a Saturday, Sunday, or legal holiday. Alternatively, the aggrieved person may have the determination of the county clerk reviewed by filing a mandamus, certiorari, or other appropriate remedy in circuit court."

Sincerely,



CATHY M. GARRETT
WAYNE COUNTY CLERK

cc. W. Alan Wilk, Attorney for Adam Hollier
Melvin Butch Hollowell, Co-Counsel for Adam Hollier
Rebecca A. Camargo, Principal Attorney, Assistant Wayne County Corporation Counsel
Michigan Secretary of State, Bureau of Elections