VIRGINIA:

IN THE CIRCUIT COURT OF THE CITY OF RICHMOND

ALAN SCHINTZIUS Antwanette Brown, Annquinnette Kenney, Korvel Mabry, Phillip Ricks, Sharon Smith, Chevis Warren,	CL16-3875-,
Plaintiffs, v.	CIRCUIT COURT AUG 2 3 2016
J. KIRK SHOWALTER, General Registrar for the City of Richmond, C. Starlet Stevens, Chairman of the Richmond Electoral Board, Cecila A. B. Dabney. Secretary of the Richmond Electoral Board, Ophelia Daniels Vice-Chairman of the Richmond Electoral Board James Alcorn Chairman, Virginia State Board of Elections; , Clara Belle Wheeler Vice-Chairman, Virginia State Board of Elections; Singleton B. McAllister, Esq. Secretary, Virginia State Board of Elections,	EDWARD F. JEWETT CLERK BY O.C.))))))))))))))))))
and, Edgardo Cortes Commissioner, Department of Elections)))
Defendants.	,)



PLAINTIFF'S MOTION FOR TEMPORARY INJUNCTION

Plaintiff's Alan Schintzius, Antwanette Brown, Annquinnette Kenney, Korvel Mabry,

Phillip Ricks, Sharon Smith and Chevis Warren, by counsel, hereby move the Court, pursuant to

Virginia Code §8.01-620, et seq., for entry of a temporary injunction thereby enjoining

Defendants from finalizing the list of candidates running for the Mayor in the City of Richmond

on the General Election Ballot until such time as Defendant's, City Registrar and the Richmond

Electoral Board, provide Schintzius with a due process review and hearing required concerning

his disqualification from the ballot and the disqualifications of the signatures of plaintiffs. The

grounds for this Motion will be fully explained in a supporting memorandum to be filed by

Plaintiffs.

Respectfully Submitted

Jøseph D. Morrissey

Joseph D. Morrissey Morrissey & Goldman, LLC 605 E. Nine Mile Road Highland Springs, Virginia 23075 804-737-1626 Telephone 804-737-1671 Fax

CERTIFICATE

I hereby certify that on this 23rd day of August 2016, a true and exact copy of the foregoing Motion for Temporary Injunction was hand delivered to the following:

J. Kirk Showalter, General Registrar for the City of Richmond

C. Starlet Stevens, Chairman of the Richmond Electoral Board

Cecila A. B. Dabney, Secretary of the Richmond Electoral Board

Ophelia Daniels, Vice Chairman of the Richmond Electoral Board

James Alcorn, Chairman, Virginia State Board of Elections

Clara Belle Wheeler, Vice Chairman, Virginia State Board of Elections

Singleton B. McAllister, Esq., Secretary of the Virginia State Board of Elections

Edgardo Cortes, Commissioner, Department of Elections

Joseph D. Morrissey

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Commissioner, Department of Elections)
Defendants.)
	/

PLAINTIFFS MEMORANDUM IN SUPPORT OF MOTION FOR TEMPORARY INJUNCITON

Plaintiffs J Alan Schintzius ("Schintzius"), along with Plaintiffs Antwanette Brown ("Brown"), Annquinnette Kenney ("Kenney"), Korvel Marby ("Mabry"), Phillip Ricks ("Ricks"), Sharon Smith ("Smith"), and Chevis Warren ("Warren"), (the last six collectively the "Signatory Plaintiffs"), by counsel, request this Court issue a temporary injunction requiring Defendants to provide the due process review required by the U.S. Constitution along with the Constitution of Virginia when the highly protected and important rights of political speech, ballot access, and candidate petitions and the right of association are at issue in matter before a government agency when such agency is acting under the color of state law. Defendants are relying on a process fueled by arbitrary and capricious actions, involving suspect interpretation and application of constitutional provisions, statutes and regulations, along with setting deadlines adverse to the exercise of important constitutional rights. Because of Defendants insistence on such a flawed process, the Signatory Plaintiffs have had their valid petition signatures disqualified, thereby denying their constitutionally protected rights and in turn resulting in Schintzius being denied of the constitutional right he earned to be listed on the November 8, 2016 general election ballot inasmuch as he met the qualifications for such ballot inclusion set by Virginia law.

Accordingly, Defendants should be enjoined from relying on such a flawed process, and furthermore enjoined from finalizing the election ballot until they provide the due process review required by the constitutional law of the United States and the Commonwealth consistent with applicable other laws. Indeed had defendants merely expended a de minimus amount of time examining what they knew or should have known would be probative likely dispositive evidence in their sole possession or readily available to them – which they knew or should have known was not made available to Schintzius – they would have realized Schintzius had earned

the right to be on the ballot.

I. INTRODUCTION

This action is brought in order to enjoin Defendants' from using an unconstitutional State policy and to require Defendants to provide Plaintiffs with the basic due process review regarding their decision to reject Schintzius petition to be placed on the ballot for the November 8, 2012 general election specifically the contest for the Office of Mayor of the City of Richmond.

On June 21, 2016, the General Registrar of the City of Richmond ("Registrar") sent Schintzius a late night email concerning the signatures on his petitions submitted by the June 14th deadline. The email informed him that his petitions had been deemed not to satisfy – in one specific aspect – the required number of signatures of qualified voters required by state law for him to have earned the right to be included on the November general election ballot. While Schintzius had satisfied the requirement for getting 500 signatures of qualified voters citywide, he had solely failed to get the 50 signatures required in each of the Richmond's 9 council districts. The email said Schintzius had failed to submit the necessary 50 signatures needed from the Eighth District. In that district, he was deemed to have only submitted 43 signatures of qualified voters. Thus no matter his success elsewhere, solely missing the required number of 50 in the 8th disqualified him from the general election ballot.

Having only 43 meant he had fallen 7 short. However, in considerable measure due to a 2012 case in Richmond Circuit Court involving a mayoral candidate then wrongly disqualified by these same institutional defendants [back then the Department of Elections had not been singled out in the statute and as now, it remains under the State

Board of Elections] from the ballot, the 2013 Session of the General Assembly added a new provision to § 24.2-506 of the Code of Virginia, ("Va. Code") 1950, as amended.

The new Va. Code § 24.2-506(C) gave a candidate disqualified from the ballot on account of submitting an insufficient signatures of qualified voters the right to a limited appeal to challenge one aspect of this disqualification. While this statute merely says the "consideration of appeal shall be limited to whether or the signatures on the petitions that were filed were reasonably rejected", the SBE has interpreted this to mean the candidate "bears the burden of proof in establishing that a sufficient number of signatures of qualified voters were timely provide." 1VAC20-30(G).

This is a subtle but potentially fundamental difference. But under any standard, a rejection can't be reasonable if it can be shown the REB – but not Schintzius – had access to probative evidence in the possession of the government that would have likely shown the rejection unreasonable: but the REB refused to consider it. This is unreasonable and a violation of due process for a government entity to refuse to consider such probative evidence especially if it can be shown such probative evidence is in the sole possession of its appointee – the Registrar – *Brisco v. Kusper*, 435 F. 2d 1046 (7th. Cir. 1970).

In terms of the scope of the limited review, the SBE GREBook guidance book for local registrars and local election boards, consistent with the plain meaning of the statute, correctly says the "scope of the appeal is solely on his invalidated petition signatures...[and] the candidate is not permitted to expand the appeal beyond the adjudication of invalid signatures." GREBook § 10.3.6.

The June 21st email set 9:00AM on June 27th as the mandatory deadline by which Schintzius had to formally file for the limited appeal hearing created by the statute.

Schintzius did in fact file for the appeal on or about that time as instructed. The email also said Schintzius would have to file his written evidence by the same Monday morning deadline. Schintzius likewise filed on this date. The instant matter is therefore the first case under this new statutory provision as regards a candidate for Mayor of Richmond. Upon information and belief, it is also the first case for any office in Richmond under this statutory addition. The State Board of Elections ("SBE"), pursuant to the statute, also promulgated regulations 1VAC20-50-30 and 1VAC20-60-20, addressing the new appeal process and signature disqualification respectively.

However, Va. Code § 24.2-506(C) clearly states the "candidate may appeal...within five calendar days of the issuance of the notice of disqualification." Va. Code § 1-210 provides the formula to calculate the "5 calendar day" period in the instant matter. § 24.2-506(C) additionally instructs the SBE to develop uniform procedures for the "conduct of the appeal" consistent with the new statutory provision.

As Plaintiffs have demonstrated in their complaint, Defendants, contrary to due process, acting arbitrarily and capriciously, denied Schintzius the time provided by law to gather the evidence the government said would be required of him to prove his case. Moreover, in an even more blatant denial of due process, the government officials in charge of the hearing—the members of the REB - refused to consider crucial probative evidence, likely to be determinative, in the sole possession of the Registrar, their appointee and at all times required to carry out "duties" proscribed by the electoral § 24.2-114 (18). Moreover, the REB knew or should have known this evidence was not made available to Schintzius. Finally the REB hearing process had the Registrar as the *de facto* chief witness against Schintzius, yet didn't allow Schintzius to have access to this potential crucial evidence, namely the signatures on the registration materials filed by all the Plaintiffs in this case and those others similarly situated

with the Registrar upon becoming a voter in Richmond. Such denial violates due process. *Brisco, supra*. Indeed the REB followed the Registrar's recommendation and affirmed the previous disqualification of Schintzius from the ballot although agreeing with the Registrar to count an additional 3 signatures previously disqualified. But since this still left the count at 46, Schintzius remained disqualified from the ballot having fallen below the 50 minimum signatures of qualified voters required in the Eighth District. Accordingly, Defendants failure to provide the due process review required by the U.S. Constitution, further compounded by the failure of the Defendants to adhere to the strictures of state law and regulation when dealing with these protected rights, threatens the integrity of the upcoming City of Richmond Mayoral contest. Because of the rapidly developing statutory deadline for the printing of the general election ballot, Plaintiffs seek a temporary injunction enjoining Defendants' from printing this ballot until they have provided the basic due process review consistent with the constitutional commands as amplified by state law.

This is consistent with the action taken by this Richmond Circuit Court in 2012.

II. BACKGROUND

A. The Parties

Plaintiff Schintzius is an independent candidate for mayor in the City of Richmond who has been denied the right to appear on the ballot. Plaintiffs Brown, Kenney, Ricks, Mabry, Smith, and Warren were at all times citizens of the United States and citizens of the Commonwealth of Virginia, all easily found on the Virginia voter registration system where they are listed in active status, all with "registration addresses" associated with their name on the

system. These "registration addresses" are in the 8th council district. As demanded by the state-mandated petition form, the Plaintiffs all truthfully gave the requested "residence address" in the column entitled "residence addresses." There is no column for "registration addresses" on the state petition form. The petition also required they date the petition to show the signature had been collected within the appropriate statutory window. All signatures were collected in a timely fashion. Thus the Plaintiffs completed, truthfully and on time, all the petition requirements as defined state, making them "qualified voters" for signing and their signatures counted. Va. Code § 24.2-101, 506(A). Their signatures were however all disqualified, leading to Schintzius' being denied a spot on the ballot.

Defendant J. Kirk Showalter ("Showalter" or "Registrar") is the General Registrar for the City of Richmond. Showalter is responsible for verifying petitions of candidates for office in Richmond and must submit the results of her verification to the Richmond Electoral Board ("REB"). Defendants Stevens, Daniels and Dabney are respectively the Chair, the Vice-Chair and Secretary of the REB. The REB is responsible for appointing and removing the Registrar and for conducting elections. Va. Code § 24.2-109. REB also reviews the Registrar's performance. § 24.2-109.1. The REB additionally has the authority to assign the Registrar duties to insure the accuracy and fairness of any action carried out by her office. Va. Code § 24.2-114 (18).

Defendants James Alcorn, Clara Wheeler and Singleton McAllister are respectively the Chair, Vice-Chair and Secretary of the State Board of Elections ("SBE"). The SBE is the chief election authority in Virginia, and responsible for the administration of state laws affecting voting, petition signing and for assuring that the elective process in the

Commonwealth is conducted in accordance with the law. Id. § 24.2-102-103. The SBE is charged as follows:

The State Board, through the Department of Elections, shall supervise and coordinate the work of ...electoral boards and of the Registrars....It shall make rules and regulations and issue instructions and provide information consistent with the election laws...to the electoral boards and registrars to promote the proper administration of election laws.

Va. Code § 24.2-103(A).

Defendant Edgardo Cortes is the Commissioner of the Department of Elections. The SBE works through the Department of Elections to coordinate their work with local registrars and election boards.

The SBE's guidance documents state the SBE, through the Department of Elections, is responsible for "(v)erify(ing)accuracy of electoral boards; candidate certifications." SBE GREBook § 10.2.2. Local registrars and electoral boards work in concern with – and under the supervision of – the SBE. In accordance with its statutorily mandated duties generally and § 24.2-506(C specifically, the SBE promulgated state regulation 1VAC20-50-30 relating to the conduct of the appeal hearing held on June 30th, and state regulation 1VAC20-60-20 discussing matters directly relating the acceptance or disqualification of a petition signature. In addition, the GREBook discusses matters relating to acceptance or disqualification of petitions or petition signatures. GREBook § 10.2.5-10. The GREBook also addresses how candidates are to be notified for having been disqualified for allegedly failing to submit a sufficient number of signatures from qualified voters and what happens next in terms of a possible appeal hearing. GREBook§ 10.3.5-8.

B. Requirements for Qualification as an Independent Candidate for Mayor.

In addition to compliance with Chapter 5 of Title 24.2 of the Code of Virginia, persons seeking to be placed on the ballot for mayor must "file with their declaration of candidacy a petition containing a minimum of 500 signatures of qualifier voters of the city, to include at least 50 qualified voters from each of the nine election districts." City Charter § 3.01.1. Pursuant to § 24.2-507(1), petitions to qualify for the general election ballot must be submitted by the second Tuesday in June. Schintzius timely met this June 14th filing date for petitions and other documents required to be filed by a candidate seeking a place on the ballot for Mayor.

C. Rejection of Schintzius' Petition Signatures

The June 21st email acknowledges that Schintzius had filed his petitions and other paperwork by the required due date. It further said these petitions had been found to have 670 signatures of qualified voters spread out across the city, more than enough to satisfy the citywide requirement in the City Charter. However, 50 signatures of qualified voters also required in each of the city's nine council districts. City Charter § 3.01.1 As previously indicated, the June 21 email said the *initial* review conducted by the Registrar's office had found sufficient signatures in all districts except one: only 43 acceptable signatures were found for the 8th district. This 7 signature deficit therefore disqualified Schintzius from the ballot. In making this determination, the signatures of Brown, Kenney, Mabry, Ricks, Smith and Warren, among others, had been disqualified and thus not counted even though they had accurately followed the instructions on the state-mandated petition form (a copy of the petitions are attached as Exhibit A).

The June 21 email further informed Schintzius of his right, as a candidate disqualified from the ballot on account of insufficient signatures, to appeal this disqualification to the REB. The email set out certain mandatory requirements, procedural and evidentiary, that

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Schintzius would be required to meet by no later than 9:00AM on June 27th. It further said June 30th had been set for any hearing at the time and place provided, should Schintzius file a formal request for the limited hearing afforded by state law.

Schintzius did file for the limited hearing on at or about the June 27th deadline. He further filed at the same time, as required by the email, the particular "written evidence" demanded by the REB to support his claims.

The REB, assisted by the Registrar, met on June 30th as scheduled. As previously noted, Va. Code § 24.2-506(C) says the "consideration on appeal *shall be limited* to whether or not the signatures on the petitions that were filed were *reasonably rejected* according to the requirements of this title and the uniform standards approved by the State Board for review of petitions." *Id.* (Emphasis added).

The REB didn't allow any new evidence discovered after the 9:00 AM June 27th deadline to be presented at the hearing. The REB further adopted the recommendations of the Registrar at all times, and upon information and belief, did not perform any of the due diligence or independent review of the evidence readily available to them in order to determine whether the Registrar had made mistakes in disqualifying a signature (a copy of the Registrar's written explanation for the recommendations are included in exhibit B). The definition of "reasonably rejected" is not found in Va. Code § 24.2-506C, or anywhere else in Title 24.2, the election law section, of the Code of Virginia.

However the SBE regulation written pursuant to Va. Code. § 24.2-506(C) says "(t)he candidate bears the burden of proof in establishing that a sufficient number of signatures from qualified voters were timely provided." 1VAC20-50-30(G). The SBE's GREBook, containing general guidance for on procedural and evidentiary matters for local

registrars and electoral board, says the "candidate bears the burden of proof in establishing sufficient evidence to overturn a disqualification decision." § 10.3.6. It further says "(t)he scope of the appeal is solely on his invalidated signatures. The candidate is not permitted to expand the appeal beyond the adjudication of invalid signatures." § 10.3.6.

Therefore the limited hearing provided Schintzius did not allow him to raise any of the constitutional or other legal issues herein cited and addressed by the Plaintiff's complaint nor this application for a temporary injunction. Moreover, despite imposing on Schintzius the burden of proof, he wasn't allowed at the June 30th hearing to introduce any evidence not submitted by the June 27th morning deadline or even point out that the REB actually had in its possession, or readily available to it at all times since June 14th, probative crucial evidence likely to show his disqualification had resulted from the unreasonable disqualification of signatures contrary to the standard in Va. Code § 24.2-506(C).

Schintzius did request the REB not to rule on the June 30^{th} and extend the time to ensure the right decision was made. The REB refused.

The REB made its ruling on June 30th. Three (3) previously disqualified signatures were counted upon the recommendation of the Registrar based on the evidence submitted by Schintzius. This now gave Schintzius a total of 46 (the 43 initially accepted and now 3 more accepted at the hearing) signatures of qualified voters. Having therefore found him still 4 short of the 50 threshold, they reaffirmed the decision to disqualify him from the ballot. They evidentially decided he had not carried the burden of proof assigned him by the SBE regulation. However, considering the REB's evidentiary rules, and the failure to review the probative, crucial and likely dispositive evidence in the sole possession of the Registrar – their

appointee – it is clearly not a reasonable exercise of governmental authority when highly protected constitutional rights are at issue.

§ 24.2-506(C) says the REB's decision "shall be final and not subject to further appeal." 1VAC20-50-30 is to the same effect saying that "(a)ll determinations of the board before which the appeal is being heard shall be considered final and not subject to further appeal." In the same vein, the "(t)he outcome of the appeal is final and not subject further challenge" declares GREBook § 10.3.6.

Accordingly, at no time, did the serious matters of constitutional and statutory law, involving protected rights including those protected by the 1st and 14th Amendments to the U.S. Constitution and Article 1 of the Constitution of Virginia, raised by the Plaintiff's complaint and application for a temporary injunction, receive any attention, much less any determination, by the REB or the SBE. Indeed, the SBE said state law prohibited any such consideration. Upon information and belief, no attorney representing the REB or SBE attended the June 30th meeting.

D. First Case under New 2013 Hearing Law Involving a Candidate for Mayor of Richmond

In 2012, this Court had occasion to hear a case brought against these same institutional defendants – the General Registrar of Richmond, the Richmond Electoral Board and the State Board of Elections – seeking review by a candidate for Mayor of Richmond wrongfully disqualified from the ballot. Certain similar constitutional and other concerns were raised during the course of that matter. The Court granted the petition for temporary injunction and allowed the disqualified mayoral candidate to present evidence to the Registrar and REB to show signatures previously disqualified signatures were actually valid signatures of qualified voters that should have been counted. After reviewing the Plaintiff's evidence as required by due process, the

Registrar continued to insist the candidate had not submitted sufficient signatures to qualify for the ballot. The Court then held an emergency hearing at the request of the Plaintiffs where the Plaintiffs challenged the Registrar's continued refusal to accept the evidence showing the candidate submitted a sufficient number of qualified signatures to earn a spot on the ballot. After hearing arguments on the evidence and the law from both sides, the Court overruled the government's decision to disqualify the candidate. The court found the candidate had indeed submitted a sufficient number of signatures from qualified voters. It ordered the candidate to be listed on the general election ballot.

The new law contained in Chapter 684 of the Session Laws of the 2013 Session of the General Assembly was aimed at preventing candidates from being wrongfully disqualified due to the failure by local election officials to properly consider all the likely probative evidence. In addition, Chapter 684 added a last sentence to the definition of "qualified voter" for "purposes" of having a signature counted on a petition. This new provision has likewise never been subject to review in a case of a candidate disqualified from the mayoral ballot in Richmond, or upon information and belief, any candidate since being enacted.

Accordingly, it is important to ensure that this new statute isn't used by government officials to shield even the most such egregious due process errors.

E. The Urgency of the Present Situation

Under § 24.2-612, printed ballots must be available for absentee voting not later than 45 days prior to the November general election. The upcoming election is November 8, 2016, which means printed ballots must be available on or before September 24, 2016. Based on the representations made in the 2012 matter, and upon information and belief, final proof of the ballot, including changes from the initial proof, will be sent to the printer on or around

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September 8th, 2016. Unless the review requested by this Motion is performed prior to this deadline, or Schintzius' is ordered onto the ballot, his name cannot appear on the November 8th, 2016 ballot.

III. ARGUMENT

In this circuit, although there appears to be no Virginia Supreme Court cases directly setting a finite standard, to get a temporary injunction, Plaintiffs must show (1) they are likely to succeed on the merits, (2) they ae likely to suffer irreparable harm in the absence of preliminary relief, (3) a balance of the equities tips in favor of the Plaintiffs, and (4) an injunction is in the public interest. See *McEachin v. Bolling*, No. CLII-5456, 2011 Va. Cir. LEXIS 189 (non-suited 2/28/12), and more generally, *Winter v NRDC*, Inc. 555 U.S. 7, 20 (2008.)

A. Plaintiffs are Likely to Succeed on the Merits of Each of Their Claims

1. Signatory Plaintiffs are likely to succeed on claim that Defendants Are Violating Their Rights under the First and Fourteenth Amendments.

"[A] citizen's signing of a petition [is] 'core political speech'" protected by the First Amendment. *Nev. Comm'n on Ethics v. Carrigan*, 131 S. Ct. 2343, (2011) [quoting *Meyer v. Grant*, 486 U.S. 414, 421-22 (1988)]. State action imposing burdens on political speech are subject to strict scrutiny, while those imposing lesser burdens are subject to less review. Timmons v. Twi Cities Area New Party, 520 U.S. 351 (1997); *Burdick v. Takushi*, 504 U.S. 428 (1992).

In terms of the likelihood of success on the merits, the facts need only to be presented in a straightforward narrative to show Plaintiffs are likely to succeed on the merits. Schintzius wanted to be listed on the ballot as a candidate for Mayor for the City of Richmond. All candidates are independent, it is a non-partisan election. Va. Code § 24.2-506(A) says a

"candidate for any office, other than a party nominee" cannot qualify for the ballot "unless he shall file...a petition...on a form prescribed by the State Board, signed by the number of qualified voters [specified for that particular office]...and listing the residence address of each such voter." (Emphasis added). The date of the signature is also required but if left off, it can be presumed from the dates of other signers on the same petition page. Thus the "signature" and the "residence address" are the fundamental information that must appear.

Unfortunately, there is a "gotcha" provision, known by state election officials, but unknown to citizens, that fools and entraps voters as they try to exercise highly valued and supposedly protected core political rights. But let's not get ahead of the narrative.

Schintzius spent weeks getting these signatures of qualified voters and had them put down the requested "residence address", the term understood in common parlance to mean where the voter currently resided. The definition of a "qualified voter" is found in Va. Code § 24.2-101. The term had been clarified, for purposes of petition signing, by Chapter 684 of the Session Laws of the 2013 Session of the General Assembly. At the time, a "qualified voter" had the following qualifications. He or she had to be "citizen of the United States." Article II, § 1 of the Constitution of Virginia. He or she had to be of voting "age." Va. Code § 24.2-101(i), to the same effect Article II, § 1 of the Constitution of Virginia. He or she had to be "a resident of the Commonwealth and of the precinct in which he offers to vote." § 24.2-101(ii), to the same effect Article II, § 1 of the Constitution of Virginia. He or she had to be "a registered voter" on the Virginia voter registration system. § 24.2-101(iii) and to the same effect, Article II, § 1 of the Constitution of Virginia.

Signing a petition is of course different than "offers to vote." In that regard, the 2013 amendment to the definition of "qualified voter" in Va. Code § 24.2-101 added this final sentence copied here in pertinent part:

"[f]or purposes of determining if a signature on a petition shall be included in the count toward meeting the signatures of any petition, "qualified voter" shall include only persons maintained on the Virginia voter registration system (a) with active status)..."Id . (Emphasis added).

All the Plaintiffs in this case were maintained on this system in active status. All the Plaintiffs truthfully listed their residence address on the state mandate petition form as requested by state election officials. All six were therefore qualified voters for purposes of signing the petition since they were registered voters on Virginia voter registration system, of voting age, citizens of the United States, and had residences in the precinct where the offered to sign the petition.

So you ask: Why weren't they counted?

Plaintiff Rick's situation is different than the other 5 since his signature was deemed unreadable and presumably the same for the residence address since the *initial* review by the Registrar said the information on the petition made him impossible to identify. Self-evidentially this isn't true. But let's put his situation aside, since if the other five Signatory Plaintiffs are qualified voters, then the 50 signature threshold will have been met and the failure to count Ricks will not matter.

Indeed the gravamen of the unreasonable and unconstitutional mistakes made by Defendants comes down to the common circumstance leading to the unjustified disqualification of Plaintiff Brown, Kenney, Mabry, Smith and Warren. They followed the

instructions on the state-mandate petition form required by defendants. They followed the mandate of § 24.2-506(A). They signed in a legible fashion. They entered their "residence address" as required. The signature satisfied the date requirement in state law.

In other words: They did everything Virginia election officials asked them to do.

So what's the "gotcha" catch? At all times, Virginia election officials are aware many tens of thousands of Virginians move but don't update the address information associated with their name in the Virginia voter registration system. We live in a mobile society. Associated with every Virginian on the Virginia voter registration system is his or her "registration address", that it is to say the address listed for their name on the system. It is the prior residence address.

Brown, Kenney, Mabry, Smith and Warren were among these many tens of thousands of individuals who had moved but not yet updated their "registration address" on the Virginia voter registration system to reflect their current residence addresses. Thus, by truthfully answering the petition form and putting down their current "residence address", they faced a technical dilemma unknown to them created by the state-mandated petition form. The state at all times had the opportunity of warning petition signers of what might happen if the "residence address" on the petition form differed from their "registration address" on the Virginia voter registration system. The state always had the option of either providing a place on the petition for those voters to also indicate their registration address, creating another form to be filled out by voters in Brown, Kenney, Mabry, Smith or Warren's position to allow them to provide whatever information the Registrar and REB wanted, or include an advisory clear

warning on the petition telling signers their signatures might not count if they didn't update their voter file information by the time the petitions were reviewed.

Despite all these options, the state did: nothing. It has long been constitutional law that these kinds of technical, unknown, "gotcha" type rules and other similar s for disqualifying signatures violate due process. See, e.g, *Brisco supra*. First amendment core political rights are high protected and a state must take strides not to burden them with procedures lacking any legitimate state purpose or compelling reason especially when citizens are not informed. This is basic constitutional law. It isn't fair. In *State ex rel. Scott v. Franklin City Board of Elections*, 136 Ohio St. 3d 171 (Ohio Sup. Ct. 2014), the Ohio Supreme Court found that give the election board' responsibility to "certify the sufficiency and validity of petition", that as "part of that duty, boards must compare petition signatures with voter registration cards to determine if the signatures are genuine." *Id* at 173. Furthermore, Justice Kennedy said in a concurring opinion that it is "fundamentally unfair, and an abuse of discretion, to tell voters that a "signature" will be acceptable and then invalidate some of those signatures because they don't satisfy narrower, undisclosed criteria." *Id* at 174.

When it comes to signing a petition, the state form has a known but unaddressed "gotcha" provision costing Plaintiffs in this case their constitutional right of core political speech in turn leading to Schintzius being denied the constitutional right he had earned to be listed on the ballot.

Why does it happen?

When *initially* reviewing the petitions timely submitted by Schintzius, the Registrar – and this is apparently true of registrars across the Commonwealth – didn't check the signatures even though the signature is the focal point of the state law since making a ballot

depending on meeting the signature-count requirement for the office sought. See Va. Code § 24.2-506(A) (1-7). Checking signatures could be easily be done since the local Registrar of each of the jurisdictions keeps the voter's registration materials containing the signatures of all voters. This is true of the Registrar in the instant matter. These registration materials would therefore contained signatures that could be matched to the signatures on the petitions of people with the same name.

Yet Plaintiffs concede that <u>initially</u> failing to check petition signatures serves a legitimate state purpose. There is no evidence of widespread fraudulent signatures. Thus the time and resources necessary to check every signature against the registration materials in a city the size of Richmond for example isn't a prudent expenditure of resources. Admittedly some fraudulent signatures may go undetected. But this failure to check any signature doesn't produce a due process violation at this *initial* stage of petition review.

Moreover, there is also the "residence address" information on the petition form provided by the signer. It is reasonable for the state to have the following policy: if Jane Doe signs her name on a petition listing XYZ street as a "residence address" and the Virginia voter registration system lists a Jane Doe at the same XYZ street, then it will be assumed the two names are one and the same for petition signing purposes. Thus counting her signature without checking is a reasonable state policy for the *initial* stage in the petition review process. When the "registration" and "residence" addresses match, it is reasonable to automatically account the signature as from a "qualified voter" as defined in § 24.2-101 for purposes of § 24.2-506(A), the same for the requirements under Richmond City Charter § 3.01.01. Automatically counting a signature where the "registration address" matches the "residence address" doesn't violate due process.

Notice therefore had Plaintiffs Brown, Kenney, Mabry, Smith and Warren not been truthful – and instead put down on the petition form their "registration address" in the box for the "residence address", their signatures would have been automatically counted! The Registrar would have simply checked the Virginia voter registration list, assumed the petition information to be accurate, and since both addresses matched, counted all 5 signatures. Schintzius would now be on the ballot even though those voters had not satisfied the petition requirements of § 24.2-506(A).

A Registrar has no way to know, or cheaply found out, if a signer in fact moved from his or her registration address. Accordingly, it is reasonable for state policy to tell a Registrar, during the *initial* review of a petition signature, to assume the "registration address" is the "residence address" for purposes satisfying the petition requirements in § 24.2-506(A).

Admittedly election officials do know any number of people will put down the "registration address" when it is not their "residence address." But as indicated previously, trying to determine such information would be a huge waste of resources. Moreover this doesn't create any due process problems in the *initial* stage.

Therefore, in terms of the Registrar's *initial* review, it is understandable that Plaintiffs Brown, Kenney, Mabry, Smith and Warren were *initially* disqualified. They had truthful put down the "residence addresses" as requested, but were listed on the Virginia voter registration system under their non-updated "registration address." Since the petition form had not alerted Plaintiffs to the "gotcha" result, they had not seen any need to update their registration with the mayoral election still months away. This is the same basic rationale used by the Attorney General of Virginia in deciding voters should be counted on petitions at their "residence address." See 1974-1975 Report of the Attorney General 159 [Collection of official

opinions for this period]. This is also consistent with the definition of a "qualified voter" in Va. Code § 24.2-101. .

Thus this *initial* review found only 43 countable signatures in the 8th District from qualified voters. However, there were many signatures like the Plaintiff's – from qualified voters moving within the 8th district - whose identifies were rather easy to determine with a de minimus amount of work by election officials charged with protecting constitutional rights.

For example, take the situation of Antwanette Brown. There is only one Antwanette Brown on the Virginia voter registration system with an 8th district registration address. The odds therefore of someone other than her with the same name signing Schintzius' petition and listing a "residence address" in the 8th district albeit are slim and none. Had she put down her registration address instead of residence address, she would have been considered a qualified voter – which she is – for purpose of signing a petition and her signature automatically counted.

Therefore, while it might be reasonable to *initially* put her signature in the file of individuals who may be qualified voters but can't be identified at the initial stage, the analysis drastically chances when a candidate is only 7 short of the required number to qualify for the ballot. It would take a de minimus effort for a government official, tasked with protecting and insuring core political rights, to check the office files to determine if the signature on the petition matched the signature in the Registrar's registration materials for the only other Antwanette Brown listed in the Virginia voter registration system with an 8th district address.

At all times, Ms. Brown had followed the instructions on the state form. She met the requirements of § 24.2-506A and the definition of a "qualified voter" for "purposes of ...determining if a signature ...shall...count."

At no point had she done anything wrong, quite the opposite: she had done everything right in terms of what the state requested on the petition form. Ms. Annquinnette Kenney, the mother of Ms. Brown, Korvel Mabry, and Mr. Chevis Warren are likewise unique names on the Virginia voter registration system with 8th district registration addresses.

Upon information and belief, the Registrar never checked their signatures despite the small effort required. Moreover, Schintzius is not allowed access to the registration materials in the sole possession of the Registrar to check either. He can't force the Registrar to do it.

Accordingly, while the policy of initially not checking signatures is reasonable, it is totally unreasonable and in violation of due process for a government official in sole possession of perhaps the best probative evidence to refuse to check such signatures to prevent a unconstitutional denial of core political speech rights. Such a refusal serves no legitimate state interest or any compelling reason. *Briscoe v. Kusper*, 435 F. 2d. 1046 (7th. Cir. 1970).

Indeed, Briscoe stated that an electoral "Board must grant access for inspection ... [to] records relied upon by the agency in reaching its decision." *Id* at 1056. If an electoral board must grant access to information used to decide whether to count or not count a particular signature, why should it be allowed to withhold such information by failing to check it? As the saying goes, a decision not to do something is actually a decision to do something. A failure to act is still action.

Plaintiffs expect defendants to argue that their refusal, even if it violates due process, is cured by the fact Schintzius had the opportunity to challenge their violate of due process at the appeal hearing granted by Va. Code § 24.2-506(C).

That is smoke and mirrors. The REB demanded he file his appeal and all his written evidence with "affirmation" by 9:00AM on June 27th. But as shown in the Complaint, the state statute gave him "five calendar days to appeal". As shown in the Complaint, this gave him to at least until 11:59PM on June 27th, to file, and thus the same amount of time to collect evidence assuming – which Plaintiffs vigorously contest in the Complaint – the REB has the right to cut-off evidence gathering in that fashion or dictate that type of evidence. Va. Code § 24.2-506(C) clearly states "the consideration on appeal shall be limited to whether or not the signatures on the petitions ... were reasonably rejected." How does reducing the statutory time to collect evidence assist in making reasonable administrative decisions of this type?

Moreover, the REB may have violated Schinztius due process review rights even more drastically. Even the SBE concedes Va. Code § 24.2-506(C) says that the "proper body to which the appeal notice was given shall establish the time and place of the appeal...and convey this information immediately to the candidate." 1VAC20-50-30(F).

But here, the REB set the date of the hearing *prior* to Schintzius' formal appeal and imposed their 9:00AM, June 27th cut off dates so they could hear the matter on June 30th. But as indicated, Schintzius had until 11:59PM on June 27th to file an appeal. This would have meant the REB couldn't set the hearing date until meeting on June 28th. Based on 1VAC20-50-30G.1 saying a candidate needed to submit a list of challenged signatures no later than "two business days" before a hearing, this would have meant the REB couldn't have heard the case no earlier than July 1st. Why? The "business day" on June 27th ended at 5:00PM. Thus, the REB

couldn't have met to establish the hearing date until the next business day on June 28th. Thus they would need to set the hearing no earlier than July 1, 2016, to be consistent with the SBE regulation. Accordingly, their arbitrary and capricious violation of due process denied Schinztius, by this fair analysis, the better part of two different days of primer evidence gathering time. This is a huge slice off the statutory time allotted. It is a clear violation of the due process demanded by applicate state law.

The REB process further denied Schintzius the right to present any evidence uncovered between June 27th and the hearing in the afternoon of June 30th no matter its probative value. The REB knowingly or through incompetence failed to review surely probative and likely dispositive evidence in the sole possession of its appointee, the Registrar. Indeed, at the hearing, they allowed the Registrar to operate as the de facto leader of the effort to get Schintzius wrongfully thrown off the ballot. This is disturbing administrative behavior from election officials especially.

Indeed, the lack of due process is illustrated by the review of Plaintiff Smith. The Registrar, in her written notes given to the REB, admits Ms. Smith is a qualified voter. (See Exhibit B). However, commenting on the evidence submitted by Schintzius, the Registrar notes that "the appellant failed to identity the page and line number that the voter signed." Schintzius had inadvertently not included in the written material where Smith had signed: page 39, line 5. At the hearing, he offered to point it out.

The REB refused to let him. The Registrar's written notes say it "is recommended this signature not be accepted unless it can be verified that this individual actually signed the petition." Let's understand what the Registrar is saying: even though Ms. Smith has submitted an affidavit saying she signed the petition, even though Schintzius is willing to show

them where she signed it, and even though the Registrar concedes she is qualified voter in the 8th district, the REB, on the recommendation of the Registrar not only refuse to count her signature but self-evidentially they refused to take the de minimus steps necessary to "verif[y] that this individual actually signed the petition" by checking the signatures in the registration records.!

At all times, government officials were in possession of information that could would have showed, or was likely to show, that Schintzius had indeed earned a constitutional right to be on the ballot. Accordingly, it is clear Plaintiff's will prevail on the merits here since they all meet the statutory requirements for qualified voters for purposes of signing a petition of candidacy.

2. Schintzius is Likely to Succeed on His Claim That Defendants Are Violating His Rights under the First and Fourteenth Amendments.

Plaintiffs incorporate the previous pages as if set forth herein on the same germane points. Schintzius has a first Amendment right to have his name appear on the ballot when he has presented a sufficient number of signatures. See generally *Anderson v. Celebreeze*, 460 U. S. 780 (1983). See also *Briscoe*, *supra* at 1053-1054 "(a)ccess to official election ballots represents an integral element in effective exercise and implementation of...activities," protected by the First and Fourteenth Amendments.

Schintzius also has a right to circulate a petition, which the Supreme Court has recognized constitutes "core political speech." *Meyer, supra*, at 442. This right is independent from Schintzius' right to appear on the ballot because circulating "ballot petitions and its concomitant political dialogue are protected speech under the First Amendment. *Libertarian Party of Virginia v. Judd*, 851 F. Supp. 2d 719, 724 (Dist. Ct, Ed of Virginia, 2012). Indeed, "First Amendment protection is 'at its zenith" when it comes to this form of speech. *Independence Inst. V. Buescher*, 718 F. Supp. 2d 1257, 1273 (D. Colo.2010).

Severe burdens on Schintzius' political speech are subject to strict scrutiny while regulations that impose lesser burdens are subject to less stringent review. *Lux, supra*, at 901. However under any standard, the burdens imposed by the state, having produced a manifestly unjust disqualification of signatures by qualified voters under state law, violates his rights under the First and Fourteenth Amendments.

3. Plaintiffs are likely to succeed on the claim the State's mandated Petition form violates their First and Fourteenth Amendment Rights.

Plaintiffs incorporate the previous pages as if set forth herein on the same germane points. Plaintiffs truthfully filled out the information mandated on the State petition form. The form asks for the voters "resident" address. Plaintiffs of course knew their registration address, which was their former resident address. They had several months to update this address before the November Election. Had Plaintiffs been untruthful – and filled out the form with the registration address – the policy of the Registrar and the REB would have been to count them without any question! Thus, for being truthful, the state is denying their constitutionally protected core political speech through a process denying due process of law.

Even defendants will concede such a burden on "core political speech" must be judicially reviewed under the strict scrutiny standard. *Burson v. Freeman*, 504 U.S. 191, 197-198, (1992). Trapping honest citizens with technical games violates due process. See, e.g., *Briscoe*, supra. At all times, defendants had an easy, low cost and readily set of options to prevent Plaintiffs from falling unknowing victims to this unknown, highly technical issue. The *Briscoe* court said that "{w[e hold [the] Board of Election Commissioners of the City of Chicago may not enforce strict and technical standards which have not been definitively stated" in a manner that unfairly denies core political rights such as petition signing. Surely something too sneaky even for Chicago's legendary sneaky politics isn't acceptable in Virginia.

At the appeal hearing, the Registrar admitted that for purposes of reviewing signatures, the *registration* address, not the *resident* address requested on the form, is paramount. (See Exhibit B). Knowing this, Defendants failed to warn signers about this technical rule, not apparent from the controlling Va. Code § 24.2-506(A) on petition requirements. Then defendants relied on a limited appeal process which made it as hard as possible for Schintzius to provide the additional information the REB now demanded due to their flawed petition form.

After this limited hearing, defendants found Schintzius 4 short of the required 50 signatures needed in the 8th district to qualify for the ballot. Plaintiff's Brown, Kenney, Mabry, Smith and Warren had their valid signatures disqualified because they correctly put down the "residence address" demanded on the form not the "registration address." Thus, at all times, defendants knew that it would have taken the Registrar and the REB a few minutes effort to compare the signatures on the petition with those in the Registrar's registration file especially since 4 of the names where unique. Indeed, Ms. Brown and Ms. Kenney had the same "registration address" in the 8th and had signed the same "residence address" in the 8th on the petition form.

To the extent defendants would suggest the right of a limited appeal cures any constitutional and statutory problems with the "gotcha" petition form, their actions in limiting Schintzius time to gather probative evidence, to present evidence and their failure to review probative likely crucial evidence, in the sole possession of the registrar, belies any such "cure" as a matter of constitutional law. *Briscoe*, *supra*.

4. Plaintiffs Are Likely to Succeed on their Claim That Defendants Have violated their Due Process and Equal Protection rights.

a. Due Process - As to general process

Defendants have employed a scheme which provides no review whatsoever of even the most egregious constitutional and statutory rights, plus a skewed limited review of the government's evidentiary errors in disqualifying the signatures of otherwise qualified voters who meet all the requirements for the purposes of signing petitions but are being disqualified for not providing information never requested on the state mandated petition form. The Electoral board in *Briscoe*, *supra* also provided a limited method of review that prevented candidates from having all the available evidence, especially the evidence in possession of the person trying to know them off the ballot – in this instant matter the Registrar – to show the wrongfulness of disqualifying the Plaintiffs signatures. The *Briscoe* Court held that this "practice prevented any meaningful adjudication and violated the Due Process Clause of the Fourteenth Amendment." *Id* at 1057.

Accordingly Plaintiffs are likely to succeed on the merits.

b. Due Process - As to uneven application

The scheme created by the defendants creates three separate categories of voters who have a current "resident address" different from their "registration address" on the Virginia voter registration system.

The (1) first category are those signers smart enough to game the system, and write on the form the "registration address" attached to their name on the Virginia voter registration system that isn't their actual "resident" address. Technically they haven't satisfied the petition requirements in Va. Code § 24.2-506 since the law requires the residence address to be on the petition form. Moreover, according to Defendants rationale for disqualifying Plaintiffs Brown, Kenney, Mabry, Smith and Warren, anyone who has moved from their "registration"

address only remains a qualified voter if he or she moved within a particular time period although the precise contours of this time frame are unclear to Plaintiffs since we are unaware of any full written explanation from the Registrar available for review. Defendants know there are any number of people who therefore have moved but game the system by the way they filled out the petition. However, Defendants count the signatures of those gaming the system except on rare occasions even though Defendants know they are not in compliance with Va. Code § 24.2-506.

Category (2) two are those signers who put down on the petition form a "resident" address which is different than their "registration" address on the Virginia voter registration system, but both such addresses are within the same precinct. 1VAC20-60-20(E) (3) says the signatures of these otherwise qualified voters should be counted as long as the "signer can be reasonably identified as the same registered voter." Again, the "move" date is mentioned.

Category (3) three are for signers like Plaintiffs Brown, Kenney, Mabry, Smith and Warren who listed a "resident" address in the 8th district on the petition as requested, but whose "registration" address on the Virginia voter registration has yet been updated to reflect the resident address. Their signatures are automatically disqualified and thus not counted. Moreover, in order to be counted, the Registrar and the REB insisted on knowing the date when they moved from their "registration address." The defendants, upon information and belief, seem to be imposing Va. Code § 24.2-401 *voting* analysis on *petitioning* signing. The need to satisfy the defendants "move" date isn't referenced in Va. Code § 24.2-101, or 506(A) as germane to petition signing. But assuming *arguendo* an otherwise qualified voter loses his or her petitioning rights based on the date of their having move from their "registration address", the Defendants

are applying it an arbitrary and capricious fashion in violation of due process. Indeed, in referencing the "move date" requirement in the Helpful Hints document, the document references Va. Code § 24.2-521, However, this statute applies to primaries, not a general election ballot. It isn't germane in any case.

Due process requires similarly situated citizens to have their core political rights assessed in a fair and uniform fashion. First, as discussed in the Complaint, Plaintiffs Brown, Kenney, Mabry, Smith and Warren all seemly satisfy the Registrar's "move" date requirement as best they under it under Va. Code § 24.2-401. Secondly, the 8th council district of Richmond is not a big area. There is nothing magical in terms of rejecting or counting petition signatures based on whether someone moved a few blocks away to a new residence address in the same precinct or moved the same few blocks in a different direction across an arbitrary precinct line. There is no legitimate state purpose therefore in automatically counting those who are presumed to have moved in Category (1) with no regard to a "move" date, to likewise count those in Category (2) who move inside the same precinct without regard to a move date, but as for Category (3) to use a "move" date to deny protected constitutional rights.

Moreover, Va. Code § 24.2-101 says a "qualified voter" for purposes of signing a petition is someone who is listed in active status on the Virginia voter registration system. The law, sensibly, wants to protect the petitioning rights of otherwise qualified voters who have weeks indeed months to update registration addresses. Citizens are not supposed to be denied such rights due to any technicalities much less mistaken ones.

There is nothing in state law which says voters in active status in the Virginia voter registration system with a registration address in the 8th district of Richmond, and who are still living in the 8th district except having moved to a new residence address, are not

allowed to sign a petition and be counted towards the signature requirement unless they satisfy a "move" date. In terms of due process, the "move" date is arbitrary and capricious, a technical requirement that cannot justify its unreasonable burden on core political rights.

5. Plaintiffs are Likely To Succeed on their Claim that the Richmond Electoral Board Failure To Check The Actual Signatures Violated Their First and Fourteenth Amendment Rights.

Va. Code § 24.2-506(A), applicable to the contest for Mayor by § 3.01.1 of the Richmond City Charter, says in pertinent part:

"The name of any candidate for any office, other than a party nominee shall not be printed upon any official ballots...unless he shall file along with his declaration of candidacy a petition, on a form prescribed by the State Board, signed by the number of qualified voters specified [for the office contested]...and listing the residence address of each such voter."

Based on the representations of the Registrar in the 2012 case before this Court, and upon information and belief, the Registrar nor the REB rarely check any signature of any petition signer and more importantly, they didn't check the signatures of the Plaintiffs before disqualifying them.

Notice that state law says all a citizen must do, [The date of signing is not an issue in this matter] to exercise his or her constitutional right of petition, is to sign the petition and put down their "residence" address. The Plaintiffs followed the law and the instructions on the petition form, providing truthful answers. As indicated earlier in this memorandum, it is understandable for the Registrar's employees to not check any signature during their *initially* review in determining if a candidate's petitions had the required number of signatures of qualified voters.

However, at the point where the Registrar determines the *initial* review found the candidate disqualified by a mere 7 signatures, the requirement of due process of law says the

Registrar and/or the REB can't refuse to do the de minimum effort needed to check to the petition signature against the signature or signatures in the Registrar's registration files for signers with the same name listing a residence in the 8th district. For example, examine the treatment of Plaintiff Annquinnette Kenney. There is only one person named Annquinnette Kenney listed on the Virginia voter registration system as being a qualified voter in the 8th district but at a different registration address.

State law focuses on whether Ms. Kenney signed the petition. If she did, and if she provided her residence address, and if she is a qualified voter and registered voter with active status, then she is entitled to expect that her signature will be counted toward the 50 number threshold set by the City Charter of Richmond. The constitution of the United States has the same due process expectation.

Due process might not require the Registrar or the REB to *initially* check her signature. It may permit her signature be *initially* disqualified without any checking. This is reasonable based on the previous discussion in this memorandum. But when the *initial* review finds insufficient signatures, and the deficit in terms of needed signatures is a mere 7 as in this case – then due process says the Registrar must make the de minimus effort to check the signatures. The law wants valid signatures from qualified voters. If the signatures of a person with the same name match, then that satisfies the law.

But assuming, *arguendo*, due process didn't' require the Registrar to check, then surely due process does require the REB to check at hearing when it turns out that Schintzius was only 4 short, and likely probative if not determinative evidence of whether the disqualified signatures were wrongfully disqualified is in the sole possession of the Registrar and

thus readily available to the REB. Moreover, this key information in the sole possession – matching signatures – was not made available to Schintzius.

Given the state's responsibility to protect the exercise of core political speech rights, there is no legitimate state interest or compelling reason for the government to refuse to make such a small effort to check evidence solely in its possession when they created the situation by their petition form. *Briscoe*, *supra*.

Since Defendants at all times – including at any appeal hearing - refuse to allow a disqualified candidate to see what is very likely the best evidence to show compliance with the law, the merits of this matter weigh heavy for Plaintiffs.

B. Plaintiffs Will Suffer Irreparable Harm if an Injunction Isn't Not Immediately Issued

1. The Abridgement of Plaintiff's Rights Constitutes Irreparable Harm.

It is well established that the "loss of First Amendment freedoms, [such as the freedom of speech] for even minimal periods of time, unquestionably constitutes irreparable injury." *Real Truth About Obama, Inc. v FEC*, 575 F. 3d. 342, 351 (4th Cir. 2009) [quoting *Elrod v. Burns*, 427 U.S. 347, 373 (U.S. 1976)]). See *Newsom v. Norris*, 888 F.2d. 371, 378 (6th Cir. 1989) [infringement upon First Amendment freedom constitutes irreparable injury sufficient to justify injunctive relief.). The right to sign a petition and have that signature counted is core right under the First Amendment, the infringement of which constitutes *per se* irreparable harm. *See, e.g., Montano v. Suffolk Cnty. Legislature*, 268 F. Supp. 2d 243, 260-61 (E.D. N. Y. 2003).

Moreover, it is well-recognized that the wrongful denial of the right of independent candidates and minority party's access to the ballot constitutes irreparable harm. Indeed denying "a hopeful candidate being denied access to the ballot" has long been considered sufficient for

Plaintiffs to have "carried their burden of proving irreparable harm" for the issuance of an injunction. *Valenti v. Mitchel*, 790 F. Supp. 534. 547 (E.D. Pa. 1972).

2. An Immediate Injunction is Necessary to Prevent Irreparable Harm.

Although Plaintiffs have requested permanent injunctive relief in their Complaint, an immediate, temporary injunction is the only method by which Plaintiffs can avoid the aforementioned irreparable harm, which is imminent. Given the timelines previously discussed regarding preparing the final ballot, absent immediate relief there will not be time to include Schintzius' name on the November ballot.

C. The Balance of the Equities Favors the Plaintiffs.

It is true that "States may, and inevitably must, enact reasonable regulations of parties, elections and ballots to reduce election and campaign related disorder." *Timmons, supra* at 358. When discussing the state "interest" in a policy regulating ballot access, "the salient question is whether 'the strength of the governmental interest reflects the seriousness of the actual burden on First Amendment rights." *Lux v. Judd*, 55 F.3d 396, 402 (4th Cir. 2011). In the instant matter, the burden on Plaintiff's First Amendment rights are heavy indeed. On the other hand, the burden on Defendants is almost nonexistent: a small amount of time to check a handful of signatures against evidence already in the Registrar's sole possession, thus readily available to the REB, and the other evidence due process requires Schintzius be allowed to present. When the asserted state interest is weak, especially when state knowingly created a "gotcha" situation by requiring the use of its own mandated petition-form, and the burden on citizen's First Amendment rights is heavy, the equities favor the citizens seeking to exercise those rights. Under these circumstances, "political speech must prevail against laws that would suppress it, whether by design or inadvertence" and "First Amendment standards...must give the benefit of any doubt

to protecting rather than stifling speech." *Citizens United v. FEC*, 876, 891, 898, (2010) [quotation omitted].

D. The Public Interest Favors Issuance of a Temporary Injunction.

There is no public interest in preserving a situation in which the clearly erroneous decisions of government officials and government agencies wrongfully violate protected constitutional provisions and statutory commands, impacting the core political rights of citizens and the right a candidate has earned to be the ballot. Here, by state law and regulation, such constitutional and other legal violations may not be raised by a candidate at the so-called "appeal" hearing. Even the most egregious violations cannot be raised.

Plaintiffs have shown election officials have acted in a manner raising the the most serious of constitutional and statutory concerns, implicating storied concepts of due process and other core political speech rights.

By every measure of the U.S. and Virginia Constitutions, the public interest favors the citizen's right to protect themselves against the wrongful imposition of such burdens. There is no public interest served by the actions of the defendants, which made it as hard as possible to arrive at a reasonable conclusion on all the facts available to the government at all times. There is no public interest by denying a candidate the spot earned on the ballot given the attitude and actions of the government officials in this matter. On the other hand, the public interest is served by allowing independent candidates to compete in the electoral process. "Competition in ideas and governmental policies is at the core of our electoral process and of the First Amendment freedoms." *Williams v Rhodes*, 393 U.S. 23, 32 (1968). As recognized in *Valenti, supra*, the public interest is burdened when citizens are prevented from "express[ing] their viewpoints by running for office or supporting someone on the ballot...The public interest

is served by insuring that access to the government, through access to the ballot, is open to all."

Valenti, supra at 548.

By any measure, the public interest of Virginia citizens cannot possibly be

advanced by such a government process. Thus to the extent this court, through injunction, must

act to protect the public interest from this harm, the government can only blame itself since at all

times, they possessed the evidence to avoid the situation.

IV. CONCLUSION

WHEREFORE, Plaintiff's pray that this Court issue a temporary injunction enjoining

Defendants from printing the ballot for the Mayoral election in Richmond this coming November

8, 2016 until it has provided the due process review required as demonstrated herein, such

review to consider whatever evidence Schintzius can provide and whatever evidence is in sole

possession of the Registrar, thus making it readily available to the REB to determine whether the

signatures previously disqualified by defendants were in fact the signatures of qualified voters

under the laws of the Commonwealth and thus should have been counted, not disqualified.

Respectfully Submitted

osenh D. Morrissev

Joseph D. Morrissey

Morrissey & Goldman, LLC

605 E. Nine Mile Road

Highland Springs, Virginia 23075

804-737-1626 Telephone

804-737-1671 Fax

CERTIFICATE

I hereby certify that on this 23rd day of August 2016, a true and exact copy of the foregoing Motion for Temporary Injunction was hand delivered to the following:

J. Kirk Showalter, General Registrar for the City of Richmond

C. Starlet Stevens, Chairman of the Richmond Electoral Board

Cecila A. B. Dabney, Secretary of the Richmond Electoral Board

Ophelia Daniels, Vice Chairman of the Richmond Electoral Board

James Alcorn, Chairman, Virginia State Board of Elections

Clara Belle Wheeler, Vice Chairman, Virginia State Board of Elections

Singleton B. McAllister, Esq., Secretary of the Virginia State Board of Elections

Edgardo Cortes, Commissioner, Department of Elections

Joseph D. Morrissey

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	SIGNATURE OF REGISTERED VOTER	House Number and Street Name or		January 1 of election	SOCIAL SECUR-
-	[PRINT NAME IN SPACE BELOW SIGNATURE]	Rural Route and Box Number and City/Town year)		den manuschen den seine den se	
R) 1.	SIGN JYMANION	RESIDENCE 120 E 3945 5F		7/27/	
`	PRINT Dulay MOTT	CITY/TOWN Richmoner		11116	
¥ 2	SIGN FOT NOTES	RESIDENCE 1504 NO 1504			
L	PRINT F.A. Roscher	CITYTIONN RICLIANCE	_	127	-
C 3.	SIGN Keith FIX	RESIDENCE 318 WILLOW St.		7/27	tables of pro-dimension
1	PRINT Keith Roberts	$\Omega \cdot i = \Omega$	226	1200	. :
0 4	SIGN COLUMN	RESIDENCE 2 4 6 4 (-)	الدين سداء	_	Mare michigante annighmenter
R.	PRINT Cl.S.C. Seg H L.	CITY/TOWN C G. L.	ر پردر 2	7/27	ine t
¥1.75	SIGN Children Stude	RESIDENCE 4401 Bay and	/s /.		Control of the second s
1	PRINT Arthur Stephers	CITY/TOWN RILL US	² 3,43,	3/25/	
R 6.	SIGN MACH	RESIDENCE/626, MENGALINE NTA	(E)	CONTRACTOR STORES	Marie Company of the
10	PRINT FRANKTIONER REA	CITYTOWN RICHMOND, UP	3	17-1/16	
7.	SIGN Larry Rohr	RESIDENCE 1204 W. 42nd	;t	3/27/16	and the control of th
1	PRINT Lerry Rohr	CITYTTOWN Richmond Va	W. C.		
₹ . 8.	SIGN CONTINU	RESIDENCE 4802 Brownley C	ane	3.27.10	A SECTION OF THE PROPERTY OF T
	PRINT Cay Ang lepon	CITY/TOWN RICHMOND V.A.			
ŷ 9.	SIGN Karmed A Parkyt	RESIDENCE 207 Struberry	54	may 27	
,	PRINT GRANT ANUCHET	CITY/TOWN Richmoord VA.		200	The state of the
Ř 10.	SIGN / IMA	RESIDENCE 3458 GROVE A	E	2/21/6	•
	PRINT CHRIS BOPSTON	CITY/TOWN RVA 2322/		7 166	-

* Privacy notice: The Code of Virginia \$8.24.2-506 and 24:2-321 authorizes requesting the last four digits of your social security number to facility the checking this petition with the official voter registration record. You are not required to provide this information and may sign the petition without disposance of the General Registrar, when copying this document for public inspection, must cover the column containing social security number or part thereof.

COMMONWEALTH OF VIRGINIA

CIRCULATOR: LIUST SWEAR OR AFFIRM IN THE AFFIDAVIT BELOW THAT S/HE IS A LEGAL RESIDENT OF THE UNITED STATES OF AMERICA, NOT A MINOR NOR A VOTING RIGHTS HAVE NOT BEEN RESTORED AND THAT S/HE PERSONALLY WITNESSED EACH SIGNATURE. VOLING RUCHTS HAVE NOT BEET RESTORED AND THAT SHE FERGUNALLI WITHOUSED EACH SIGNATURE.

SIGNER: YOUR SIGNATURE ON THIS PETITION MUST BE YOUR OWN AND DOES NOT SIGNIFY AN INTENT TO VOTE FOR THE CANDIDATE. YOU MAY SIGN PETITIONS FOR MORE OFFICE USE DATE OHLY POST OFFICE BOXES ARE NOT SIGNED [Must be *SEE NOTE BELOW ACCEPTABLE after RESIDENCE ADDRESS LAST 4 DIGITS OF SIGNATURE OF REGISTERED VOTER January 1 House Number and Street Name or SOCIAL SECURITY PRINT NAME IN SPACE BELOW SIGNATURE of election Rural Route and Box Number and City/Town NUMBER year) [OPTIONAL] 12 RESIDENCE CITY/TOWN 13 120/4 14 CITY/TOWN 16. MALKI City/Town 18 3/2/ \$\Z7 Commonwealth of Virginia - AFFIDAVIT -Hace 5 Ch ditress is swear or affirm that (i) my full residential Havlind all CIRCULATOR'S LIKIVILL in the State/Commonwealth of 114 00 in the County/City/Town of LICENSE NUMBER, IF is United States of America; (iii) I am not a minor; (iv) I am not a felon whose voting rights have not been restored; and (v) I ; (ii) I am a legal resident of APPLICABLE itnessed the signature of each person who signed this page or its reverse side. Hunderstand that falsely signing this affidavit is a NAME OF STATE THAT ISSUED lony punishable by a maximum fine up to \$2,500 and/or imprisenment up to ten years-THE CIRCULATOR'S DRIVER'S 114 SENSE ACE PHOTOGRAPHICALLY REPRODUCIBLE SIGNATURE OF PERSON CIRCULATING THE PETITION NOTARY SEAL/STAMP BELOW CIRCULATOR'S LAST 4 DIGITS OF SOCIAL SECURITY County/City of fit was subscribed and sworn before upe this , 20 6 by INEXILLE PRINT NAME OF PERSON CIRCULATING THE PETITION AFRIC COSBY
NOTARY PUBLIC
COMMONWEART PUBLIC
DETC ADMINISTER DATHS NOTARY RECEIVATION IN THE PETITION IN THE PET

Privation notice: The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four algits of your social security number to facilitate the code of virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four algits of your social security number to facilitate particles are socially petition with the official voter registration record. You are not required to provide this information and may sign the petition without are social security number or part thereof.

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ENT	ER AB	OVE, RESIDENCE ADDRESS OF CANDIDATE		county of	Di. 1 8 8.5	i chavyag votasa i as Masseg juat Pon Asa Motopas in a in a in
		33:21 garland and		Spruf or sensite	ot to feetite:	e ike biccessing o _g :
ENT	ER AB	OVE, CITY/TOWN	SNTEP 490NB Z/P ~ 4	# := '= = ==	<u>Por a state</u>	
		Richmord Va	73222	to facilitat	e the propessing	e certions in county of of the filing of you ha
ENT	ER AE	NOVE, OFFICE SOUGHT MAYUR	ENTER ABOVE, DISTRICT, IF APPLICABLE		er of signalures relinal: (op	a) congressione dist Nonell
We	, the	qualified voters of the district in which the above candidate	seeks nomination or election and of	Al signat	ures required a	y law need not be or
		COUNTY OR CITY OR, FOR TOWN COUNCIL, NAME OF TOWN	signed hereunder or on the reverse	the same	page of the pa	ilitan. Numerous
side	of th	is page, do hereby petition the above named individual to be	ecome a candidate for the office stated	eacy bad	sy de circulatec e must be a pe	i. <u>The circulator of</u> irson who is her hims
		the [check only one] General Election	man T Resublines Stimes			nited States of Amer for a feign whose
		d on the STA day of Alasan bake	, 20, and we do further petition	yoting rig	his have no! be	en restored. The
tha	t his/h	ner name be printed upon the official ballots to be used at the	e election.			et or affirm in the
					of each voist	
CII	RCUL	ATOR: MUST SWEAR OR AFFIRM IN THE AFFIDAVIT ON THE REVE	RSE SIDE OF THIS FORM THAT SIHE IS A LEGAL	RESIDENT (OF THE UNITED S	TATES OF AMERICAL NO
		MINOR NOR A FELON WHOSE VOTING RIGHTS HAVE NOT BE SNER: YOUR SIGNATURE ON THIS PETITION MUST BE YOUR OWN	EN RESTORED AND THAT S/HE PERSONALLY WITH	NESSED EAG	H SIGHATURE.	
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	ICE SE				DATE SIGNED	
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i	2.	SIGN MIKE MANY	RESIDENCE /6/0 Man Holling	4/12	Mor 28	
Ŋ		PRINT MIKE AND	CINTONI DIAM MAN		2016	
E	3.	SIGN Orland Jensings	RESIDENCE 1012 St James	\$ †	3/26/11	
		PRINT Orlands Jensiel	CHYTOWN RIL VY		· // • 0/ \6	
7		SIGN A Unt	RESIDENCE 4//SMOCH AUE		3/20/2	779
K	d.	PRINT DM/NOWE PROPOT	CITYTOWN RILLIAND VA 23	72,22	0147/	*
Ñ	5.	SIGN JAVIT 19113	RESIDENCE			
1	J.	PRINT SOM STONES	City/Town		1 2 27	
2	6.	SIGN (SIGN)	RESIDENCE 2301 FILES		34	
6		PRINT P. GUISENBERRY	CIMITONIA CA LESTER ALLE	\.\.\.\.\.\.\.\.\.\.\.\.\.\.\.\.\.\.\.	1 - Y	
K	7	SIGN TO THE TOTAL	REGIDENCE 140 S. HSGANT &	,	/	
B		PRINT C. McCornick	CITY/TOWN ROLL STORE 1/4	o	11114	
C,	Я	SIGN Z	RESIDENCE 2000 MOUNTE	NT	= 1	
1		PRINT ROTRICK OMFARA	CHYPTOWN KICHTOUD			
		SIGN AND ANNA	BESIDENCE 2104 ENGRACE	Drive		the second secon
K	9.	PRINT Sevenial J. Ryall	CITY/TOMI Richhand		5/27	A CAMPAGE AND A
V	1	SIGN Andrew Ray =	RESIDENCE 2101 From Hu	も当時	1 7	r Solver
1	10	A 1 A	I NEGISERUE CI VIVI		-3129	

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			COMMONWEAL ETITION OF VOT	QUALIFIED	
ENTER ABOVE, NAME OF CANDIDATE [SHOULD BE AS IT IS TO APPEAR ON BALLOT]			[Must be filed with Deciaration of Cardidat		
ENTED AR	HUAN SCHIMTZLUS OVE, RESIDENCE ADDRESS OF CANDIDATE 1	Wher cour	en election district y or city, it is sug	includes more than or gested that you liss qualified voters in ea-	
	3321 garland and	sepal count filing	y or city to facilitat	e the processing of ti	
	OVE, CITY/TOWN RULL VI	io fac	dilitate the processing	<u>wide office</u> Ne petitions in county c y of the flung i if you tra I by congressional distr	
ENTER AL	DOVE, OFFICE SOUGHT MAYOR-	ENTER ABOVE, DISTRICT, IF APPLICABLE enter	district no.:top	tional).	
We, the qualified voters of the district in which the above candidate seeks nomination or election and of signed hereunder or on the reverse country or CITY OR, FOR TOWN COUNCIL, NAME OF TOWN side of this page, do hereby petition the above named individual to become a candidate for the office stated above in the [check only one] General Election Special Election Democratic Primary Republican Primary to be held on the day of Special Election 2 20 0, and we do further petition			All signatures required by law need not be of the same page of the petition. Numerous oages may be circulated. The circulator of each page must be a person who is herining a legal resident of the United States of Ame and who is not a minor nor a felon whose voting rights have not been restored. The circulator also must swear or affirm in the affidavit that sine personalty witnessed the		
		Signi	ature of each voter		
1	ATOR: MUST SWEAR OR AFFIRM IN THE AFFIDAVIT ON THE REVE MINOR NOR A FELON WHOSE VOTING RIGHTS HAVE NOT BE SINER: YOUR SIGNATURE ON THIS PETITION MUST BE YOUR OWN THAN ONE CANDIDATE.	EN RESTORED AND THAT S/HE PERSONALLY WITNESSE	D EACH SIGNATURE.		
OFFICE USE ONLY		POST OFFICE BOXES <u>ARE NOT</u> ACCEPTABLE RESIDENCE ADDRESS	DATE SIGNED [Must be after January 1	*SEE HOTE BELOV LAST 4 DIGITS (SOCIAL SECURI	
	SIGNATURE OF REGISTERED VOTER [PRINT NAME IN SPACE BELOW SIGNATURE]	House Number and Street Name or Rural Route and Box Number and City/Town	of election year]	NUMBER (official)	
10 1	SIGN LINEY PELLY	RESIDENCE IBY IV. (Science)	3/28/16		
	PRINT AUSTRY PETRICIS	Cry/Town A.C. 17 3222		-	
K 2.	PRINT KYLSTYN THOMOSOG	RESIDENCE 201 E131 JA CITYTONN RICH ME / WAS	1224 3 25 16		
0.	SIGN Finnett Thomasica	RESIDENCE 204 E. 13 ST.			
K 3.	PRINTKENNETT THOMASON	CITYTTOWN RICHMOND, VA 2325	74 3/28/10	, *:	
0	SIGN Houst of Home of	RESIDENCE 423 N. 187454	3/22/16		
F. 4.	PRINT TENELI R. Mansot	CHYTOWN KY Limone 1/4 232	23		
Q 5.	SIGN JEFFACIUX Brown	RESIDENCE 2877 BASTON PULC	3 127/c		
31	PRINT BELLEVILLE	CITY/TOWN RICHMEN 1 VA			
6	significant lepping	RESIDENCE) CC N. 23 T. 15	3/18/		
2	PRINT TOA BUT 2	CHYTOWN RVP =3322 /			
JJ 7.	SIGN Floren	RESIDENCE/822 DLA12 35			
ΙΧ'	PRINT (N'y Mearl	CITY/TOIYN RCL			
8.	SIGN	REGIDENCE	-	1	
	PRINT MERCY LATINACINE	Cry/To//N 3	- , 7		
9.	1 1	RESIDENCE	3/28/1		
	PRINT Annalta Walker	CITYTOWN CICKMOND OF	1	- 10 mm	
5 10	SIGN 2021-22 V March	RESIDENCE /UT/ 3/17/DX		14	

CONTINUE ADDITIONAL SIGNATURES AND COMPLETE AFFIDAVIT ON REVERSE S

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	dan Schint Zwa OFFICE SOUGHT:	Mayov	
IRCULATOR: MUST SWEAR OR AFFIRM IN THE AFFIDAVIT BELOW I VOTING RIGHTS HAVE NOT BEEN RESTORED AND TH SIGNER: YOUR SIGNATURE ON THIS PETITION MUST BE YOUR THAN ONE CANDIDATE.	THAT S/HE IS A LEGAL RESIDENT OF THE UNITED STATES OF AMERI HAT S/HE PERSONALLY WITNESSED EACH SIGNATURE. R OWN AND DOES NOT SIGNIFY AN INTENT TO VOTE FOR THE CAND	CA, NOT A MINOR	NOR A FELON WHO
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SIGNATURE OF REGISTERED VOTER [PRINT NAME IN SPACE BELOW SIGNATURE]	ACCEPTABLE RESIDENCE ADDRESS House Number and Street Name or	[Must be after January 1 of election	*SEE NOTE BELOW LAST 4 DIGITS C SOCIAL SECURIT NUMBER
SIGN 6 /3/1	Rural Route and Box Number and City/Town RESIDENCE 410 (a Ciaty of 164 Ad	year]	[OPTIONAL]
PRINT Every Waterman	CITYTOWN RICHMONNI VA	3/28/16	1
12. SIGN	RESIDENCE 38 N Harrison St	21-1	Professional Professional
PRINT Crejory Rosenhera	CITY/TOWN Richmond Va	3/30/6	
13. SIGN Robert Screen	RESIDENCE 4245 Pire	3/30/2	
SIGN BY 1/12	CITYTOWN RICHMONET V/427220	7 70016	Martino-J. Emiliation
PRINT Ashley Weatherford	CITYTOWN RICHMOND WAR 230EZ	3/30/2/6	
15 SIGN CALY NOINTIAN	RESIDENCE 424/16 Salver	CALLERY COM. N. CHEST SHEWOODS	NATION AND DESCRIPTIONS
PRINT	CITYTOWN KI Charund M. 2320	u 3/50/2	v4 187
6. SIGN (22 Coll	RESIDENCE 615 SLauret St	3/	Cresci British
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7. SIGN PRINT Jeson Mollellan	RESIDENCE 1709 Texpas Ave	3/34	Side Side Side Side Side Side Side Side
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is States of America; (iii) I am not a minor; (iv) I am not	swear or affirm that (i) my full r. in the State/Common (ii) I am a legal ot a felon whose voting rights have not been restored; an	wealth of resident of	CIRCULATOR'S DRIVER'S LICENSE NUMBER, IF APPLICABLE
sed the signature of each person who signed this page punishable by a meximum fine up to \$2,500 and/or imp		affidavit is a	AME OF STATE THAT ISSU THE CIRCULATOR'S DRIVER
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Use Arme Coshy State of 1220	MILLE County/City of Beach	<u>NOA</u> T	OF SOCIAL SECURITY NUMBER
Virginia including ins	strument was subscribed and swom before the this	(
2xpires 11/30/2018 A La X	Whill talle		
PRINT NAME OF PE	RSON CIRCULATING THE PETITION		
TED TO COTATION ON THE PERSON ANTROPIZED TO ADMINISTER DAT	HS HOTARY REGISTRATION NUMBER** DATE NOTARY COMMISSION	FXPIRCe**	

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ENT	ER AB	SSZI SAN WOOD CONTROL OF CONTROL CONTROL		separate p	eillion form for one only to facilitate	rested that you use a qualified voters in each the processing of the
ENT	ER AB	ove, CITY/TOWN Richmond Va	ENTER 480V8, ZIP + 4	to facilitate	the processing	e pelitions in county obj of the filing. I you track
ENT	ER AB	OVE, OFFICE SOUGHT MAKING	ENTER ABOVE, DISTRICT OF APPLICABLE		r or signatures : ot no.: (opti	oy congressions: distroi onai).
We	, the	qualified voters of the district in which the above candulate County OR CITY OR, FOR TOWN COUNCIL, NAME OF TOWN	seeks nomination or election and of signed hereunder or on the reverse	the same	page of the pat	r law need not be on itien. Numercus The circulator of
	ove in	is page, do hereby petition the above hamed individual to be the [check only one] General Election		each page a legal res	must be a per eident of the Un	son who is henhimse ited States of America or a felon whose
to I	be hei		. 20 Cand we do further petition	circulator affidavit th	also must swe at s/ne person	en restored. The ar or affirm in the ally witnessed the
				<u>signature</u>	of each voter	
С		ATOR: MUST SWEAR OR AFFIRM IN THE AFFIDAVIT ON THE REVE MINOR NOR A FELON WHOSE VOTING RIGHTS HAVE HOT BE SHER: YOUR SIGNATURE ON THIS PETITION MUST BE YOUR OWN. THAN ONE CANDIDATE.	EN RESTORED AND THAT S/HE PERSONALLY WIT	NESSED EAC	HISIGNATURE.	
ι	FFICE JSE MLY		POST OFFICE BOXES <u>ARE</u> ACCEPTABLE	NOT	DATE SIGNED [Must be after	TSEE NOTE SELON
	*******************************	SIGNATURÉ OF REGISTERED VOTER [PRINT NAME IN SPACE BELOW SIGNATURE]	RESIDENCE ADDRESS House Number and Street Name of Rural Route and Box Number and City		January 1 of election year]	SOCIAL SECURIT NUMBER [OPTIONAL]
A	1.	SIGN Z	RESIDENCE 293/11/4864 ST		1410.6	
		PRINT LETLA BYTESHATEL	CITYTOM RICITYOND		/	
6)	SIGN Proposition (Ex light)	RESIDENCE 2114 HOUNDARY	Au	7 / hy	!
1	2.	PRINT Debra Culotti	CONTROL KICH VH232	20	16	
	D.	SIGN FOLIOF	RESIDENCE 25/5 Harre	765		
1	3.	PRINT Selly HO/2 shold:	CONTEN 2220		74/4/16	
F)	SIGN MANGARET ARROYAL	RES DELICE 1903 Maple Stra	edi br		:
K	4	PRINT MARGARET A - WOODY	corrollichmend Vot 2	3227	4/1/14	
	Q 5.	SIGN Megan 1/21/10077	PESIOSIJE 4072 Northro		4 99	
Ľ	Į.	PRINT MOGRA VERNON	CIMTOWN Ry, MOTTER, Ma		1	
0	6.	SIGN Steen John	RESIDENCE 11365. Delpt		4//	1
1	/	PRINT DARELL HYDEN	CITYTOWN W-LOYO VA 22980 4/1/16			
1	R 7.	SIGN	RESIDENCE 3220 BACT	ON AVI	4/1/16	
	1	PRINT CHARLES ODONOVAN	CITY/TOWN CONTROL VA 230	122	1110	
	ع 3	SIGN AMA	RESIDENCE 2923 BILLIE FEDER	r) U	41,110	
Ľ		PRINT AMULT GIVEN	CITY/TOWN Profit	. لامر		
	9	PRINT Robert Norris	RESIDENCE 304 N Adam CITY/TOWN 1217/10700/1	<u>S \$7</u> /A 23	1 4/1	
1	V		RESIDENCE TO SQ 5055+		· · · · · · · · · · · · · · · · · · ·	
	1	sign were Legen	KESINERGE THE JE SOLVET	- ^ CJY	- , t , "	; ;

Слу/Томы

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CHANGED FROM REVERSE SIDE CANDIDATE NAME: 1	ON SCHIMALY OFFICE SOUGHT: M	Nau/	
MRCULATOR: MUST SWEAR OR AFFIRM IN THE AFFIDAVIT BELOW THAT VOTING RIGHTS HAVE NOT BEEN RESTORED AND THAT S SIGNER: YOUR SIGNATURE ON THIS PETITION MUST BE YOUR OWN THAN ONE CANDIDATE.	S/HE IS A LEGAL RESIDENT OF THE UNITED STATES OF ANCEN	Oh Home	NOR A FELON WHOSE
SIGNATURE OF REGISTERED VOTER [PRINT NAME IN SPACE BELOW SIGNATURE]	POST OFFICE BOXES ARE NOT ACCEPTABLE RESIDENCE ADDRESS House Number and Street Name or Rural Route and Box Number and CityTown	DATE SIGNED [Must be after January 1 of election year]	*SEE NOTE BELOW LAST 4 DIGITS OF SOCIAL SECURITY NUMBER [OPTIONAL]
PRINT LOWER Methona	CITYTOWN RICHMOND	April 1, 2016	
12 SIGN COOK STORY	RESIDENCE 2007 Barton Arc. #2 CITYTOWN Richmond	April 2	699
PRINT A Charle Williams	RESIDENCE 3050 Lawson St. CITYTOWN RICHMAND VA	April 2, 2016	
14 SIGN MAN Pane	RESIDENCE 1255 MORAN ST CITYTOWN Richmond	april 2014	ом протуск до дерогот и мере - голий ожучений сти от голий ожучений от голий ожучений от голий от голий от голи
15 SIGN VALLE A PLAN PRINT VALLETA DÍAN	GITYTOWN RICHMANGE	April 2016	Ma, 400°6 (hayra, 20uMuhayay eun ayak 22a-yan danad
16. SIGN CALL AND	RESIDENCE 1363WE BYOND ST.	April7 2016	Marylin) dia identifi relacioni altreformate dispersioni dispersioni di propriesso di propriesso di propriesso
17 SIGNET FEELEMARIAM	RESIDENCE 304 W. M. 25MALL ST CITYTOWN RICAMCES, VA 23220	APRIL 2 2016	
18 31GN ROMER CEMERICAN	RESIDENCE CITY/TOWN 7 LANGE VAJ3210	April 2	
19 SIGN STEEL ATTECT FOR	RESIDENCE YOU HELIXICO BLYRD	April 2	Allem All standish control veneral diagnostic control section
20. SIANI PRINTI PER 2 2 FINICIO JE	1.167 M 1.32 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	APRIL	elindi occid dilitatiya ususa etti citigi (1200-1444 Alfantiya ga Dalaması
21. Sign A Re Davie	RESIDENCE 5 CO L-C 1 C	4/2 40 20 16	for that AN distriction is proposed to the transplace in the state of
ess is 33 21 gaulcond and in the County/City/Town of E	swear or affirm that (i) my full r in the State/Common (ii) I am a legal felon whose voting rights have not neen restored; an	wealth of	CIRCULATOR'S DRIVER'S LICENSE NUMBER, IF
by punishable by a maximum fine up to \$2,500 and/or imprisor	reverse side. I understand that falsely signing this imentup to ten years.	ەر affidavit is a	AME OF STATE THAT ISSUED HE CIRCULATOR'S DRIVER'S LICENSE
COLARY SEAL STANCE SELOW NOTARY PUBLIC State of 1/2/1/2	Obstrayiony o To 1111110	red (RCULATOR'S LAST 4 DIGITS OF SOCIAL SECURITY NUMBER
day of A Lax (Alk C , 20 , by	/	143
PRINT NAME OF PERSON COLOR TURE CR. GTAR: CR OTHER PERSON AUTHORIZED TO APMINISTER DATHS	NOTARY REGISTRATION NUMBER** DATE NOTARY COMMISSION		

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t*,

			B. STATE CO.			QUALIFIED
ENTE	R AB	DVE, NAME OF CANDIDATE SHOULD BE AS IT IS TO APPEAR ON	BALLOT]	VOTERS (Must be filed with Declaration of Candidate)		
	1	Man Schintzius	COLOR DE LA COLOR	When an election district inductes more han		nciudes more han or
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L.L.	ა.	PRINT	CITYTOWN R-LAMINGUAZ	3726	: { ○ ³ ⁄	
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L		PRINT	CITY/TOWN PLICHMOND, VA 23:	2.1	3/24/18	
ſ	9.	SIGN COLUMN ROBL	RESIDENCE 1504 (18016)6	1 1/1/15		
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* Privacy notice: The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facility checking this petition with the official voter registration record. You are not required to provide this information and may sign the petition without do so. The State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing social security number or part thereof.

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- DEET COME DECT-ENGESSON AUTHORIZED TO ADMINISTER OATHS MOTARY REGISTRATION MULISBER** DATE NOTARY COMMISSION EXPIRES**

Wasy notice. The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facilitate reports. You are not required to provide this information and may sign the petition without Digits of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing

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2287i JUBB	. FROM REVERSE SIDE	CANDIDATE NAME

Alun Schurbus OFFICE SOUGHT: MAYOR

CIRCULATOR: MUST SWEAR OR AFFIRM IN THE AFFIDAVIT BELOW THAT S/HE IS A LEGAL RESIDENT OF THE UNITED STATES OF AMERICA, NOT A MINOR NOR A FELON WHOSE SIGNER.					
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. 13	SIGN Charles	RESIDENCE 21 5 BRUNSHICK SI #3	- was a sample of the	Name of books	
	PRINT GULLE METALENA	CITY/TOWN PICHMOND - A	3/20/16	(.	
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	FRATE Martin Faul 1	CITY/TOWN RIC LANGE 1 1/2/2015	12/1	/	
	SIGN AND TO SIGN A	77	1/6	C.	
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	Reg. #7527182 day of	20 /4 by			
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Privacy notice: The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facilitate checking this pedition with the official voter registration record. You are not required to provide this information and may sign the petition without coding so. The State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing social security number or part thereof.

COMMONWEALTH OF VIRGINIA PETITION OF QUALIFIED VOTERS ENTER ABOVE, NAME OF CANDIDATE [SHOULD BE AS IT IS TO APPEAR ON BALLOT] [Must be filed with Declaration of Cardidady] new When an election district includes more than a county or oity, it is suggested that you use separate betilion form for qualified youers hier county or only to facilitate the processing of the ENTER ABOVE, RESIDENCE ADDRESS OF CANDIDATE 33 For a state vide office it is suggested that you file politions in count, o ENTER ABOVE, CITY/TÓWN ENTER ABOVE, ZIP + 4 23222 - Wh more to facilitate the processing of the filting. If you ira the number of signatures by congressional distr ENTER ABOVE, OFFICE SOUGHT ENTER ABOVE, DISTRICT, IF APPLICABLE enter district no : _ lootional We, the qualified voters of the district in which the above candidate seeks nomination or election and of SChin ZIVS signed hereunder or on the reverse All signatures required by law need not be or the same page of the petition. Numerous pagés may be circulated. The circulator of each page must be a person who is heribling COUNTY OR CITY OR, FOR TOWN COUNCIL, NAME OF TOWN side of this page, do hereby petition the above named individual to become a candidate for the office stated above in the [check only one] a legal resident of the United States of Amer and who is not a minor nor a felor whose voting rights have not been restored. The pirculator also must swear or effirm in the to be held on the Sty day of Movember 20 1 that his/her name be printed upon the official ballots to be used at the election. Movember, 20 %, and we do further petition affidavit that s/he personally wilnessed the signature of each voter CIRCULATOR: MUST SWEAR OR AFFIRM IN THE AFFIDAVITION THE REVERSE SIDE OF THIS FORM THAT S/HE IS A LEGAL RESIDENT OF THE UNITED STATES OF AMERICAN TO MINOR NOR A FELON WHOSE VOTING RIGHTS HAVE NOT BEEN RESTORED AND THAT STHE PERSONALLY SYMMESSED EACH SIGNATURE. SIGNER: YOUR SIGNATURE ON THIS PETITION MUST BE YOUR OWN AND DOES NOT SIGNIFY AN INTENT TO YOTE FOR THE CANDIDATE. YOU MAY SIGN PETITION SHOP INTENT OF THE CANDIDATE. YOU MAY SIGN PETITION SHOP INTENT OF THE CANDIDATE. YOU MAY SIGN PETITION OF THE CANDIDATE. THAN ONE CANDIDATE. OFFICE DATE USE SIGNED POST OFFICE BOXES ARE NOT ONLY [Must be TREE HOTE RELO ACCEPTABLE after LAST 4 DIGITS RESIDENCE ADDRESS January 1 SOCIAL SECUR SIGNATURE OF REGISTERED VOTER of election NUMBER House Number and Street Name or year] [PRINT NAME IN SPACE BELOW SIGNATURE] Rural Route and Box Number and City/Town OFT 2 --CLUMULI 109 E Luk SIGN RESIDENCE Kickmane City/Town RESIDENCE 2. 25% RESIDENC 3. 3/260/ Er City/Town RESIDENC SIGN 5. PRINT SIGN PRIM CITY/Town 9.

* Privacy notice: The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to fee

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checking this petition with the official voter registration record. You are not required to provide this information and may sign the petition with accidence.

The State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing social security number or part thereof.

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We	, the	qualified voters of the district in which the above candidate	1	All signat	ures required b	y law need not be or
		COUNTY OR CITY OR, FOR TOWN COUNCIL, NAME OF TOWN	signed hereunder or on the reverse	the same	page of the pa	tition. Numerous . The provision of
side abo	of the	is page, do hereby petition the above named individual to be the [check only one]	ecome a candidate for the office stated	each pag	e must be a be	rson who is herih —: niled States of Amer
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COMMONWEALTH OF VIRGINIA

^{*} Privacy notice: The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facility the control of the Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facility the code of the Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number of your social security number or part thereof.

THE STATE OF THE PERSON AND SELECT GOOMINISTER GATHS HOTARY REGISTRATION NUMBER!* DATE NOTARY COMMISSION EXPIRES**

PRINT NAME OF PERSON CIRCULATING THE PETITION

The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facilitate checking this petition with the official voter registration record. You are not required to provide this information and may sign the petition without cong so. The State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing specific number or cart thereof

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RESIDENCE

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OFFICE		Will Will	PIDATE. YOU MAY	SIGN PETITIONS FOR MORE
USE ORLY SIGN	SIGNATURE OF REGISTERED VOTER [PRINT NAME IN SPACE BELOW SIGNATURE]	POST OFFICE BOXES ARE NOT ACCEPTABLE RESIDENCE ADDRESS House Number and Street Name or Rural Route and Box Number and City/Town	DATE SIGNED [Must be after January 1 of election year]	*SEE NOTE BELOW LAST 4 DIGITS OF SOCIAL SECURITY NUMBER [OPTIONAL]
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ty Commission	Expires 11/30/2018 ACU X PRINT NAME OF F	PERSON CIRCULATING THE PETITION		
\$ 470.75 CF (670.0	OR OTHER PERSON LITHORIZED TO ADMINISTER OF	ATHS NOTARY REGISTRATION STRUBBERS		

Appair Agus The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facilitate checking this pattern with the official voter registration record. You are not required to provide this information and may sign the petition without the State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing any social security number or part thereof.

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	BOVE, OFFICE SOUGHT MAYOR		enter distr	ict no.: (est	ionai).
We, the qualified voters of the distriction which the above candidate seeks nomination or election and of signed hereunder or on the reverse signed hereunder or on the reverse side of this page, do hereby petition the above named individual to become a candidate for the office stated above in the [check only one] — General Election Special Election Democratic Primary Republican Primary to be held on the All day of Special Election Democratic Primary and who is not a minor nor a feron who is the control of the United States of and who is not a minor nor a feron who is not a minor no					ition. Numerous The circulator of ison who is herininss lited States of Americ or a felon whose en restored. The er or effirm in the
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to be held on the Rt day of Naunth		circulator	its nave not be also must swee	en restored. The er or affirm in the
that his/her name be printed upon the official ballots to be used at the	s election.		iat s <i>i</i> he person of each voter	ally witnessed the
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Q 2 SIGN / White	RESIDENCE ZII4 HANOVER	ALE	4/	:
PRINT KENNETH KOLB	CITYTIONIN RICHAIDNO252	<i>70</i>	/ i	
0 3 SIGN Kutherine Revarer	RESIDENCE 330 ROSewood	1 Ave	4/,	
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(4 SIGN	RESIDENCE SOLY M. W. C. BE KEY	ST APT	1 4/.	
PRINT CHRIS DAMON	CINTOMI RICHITOND, VA	Z3720	/ /	
D 5. SIGN THO HE	RESIDENCE 8161085+ C	124	Di	:
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^{*} Privacy notice: The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facility checking this petition with the official voter registration record. You are not required to provide this information and may sign the petition vitinout do so. The State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing social security number or part thereof.

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invacy notice. The Code of Virgisia §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facilitate needing this pattion with the official voter registration record. You are not required to provide this information and may sign the petition without codes. The State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing and security number or part thereof.

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List Anne Cosby
NOTARY PUBLIC
Commonwealth of Virginia
Reg. #7527182
My Commission Expires 11/30/2016 County/City of sint sent sholed move and sworn parotus, servinemuntain gride day of PRINT NAME OF PERSON CIRCULATING THE PETITION

AT USE OF NOTARY OR OTHER PERSON AUTHORIZED TO ADMINISTER DATHS NOTARY REGISTRATION NUMBER** DATE NOTARY COMMISSION EXPIRES** Privacy notice The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facilitate checking this petition with the official voter registration record. You are not required to provide this information and may sign the petition without sping sc. The State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing

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2	SIGN Emel Jun	RESIDENCE 1900 Avandal	٤.	4/10/16	
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. 9	SIGN / / /	RESIDENCE 2209 Rat In	ill Rd	1.7 8	
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0	sign dusting	RESIDENCE 11/2 W Clay St		H47 7)

City/Town

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We, the qualified voters of the district in which the above carrillate seeks nomination or ele			_ signed hereunder or on the reverse come a candidate for the office stated hary \(\sqrt{\text{Republican Primary}} \)	the same pages may each page a legal res and who is voting right giroulator affidavit the	page of the pet y be diroulated. <u>Must be a per</u> ident of the Un s not a minor the its have not be also must swea	law need not be on iden. Numerous The circulator of son who is neithinst ided States of American a feton whose an restored. The roll affirm in the air witnessed the
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CONTINUED FROM REVERSE SIDE	CANDIDATE NAME:

Alexy Schutzusoffice sought:

MAYOR

CIRCULATOR: MUST SWEAR OR AFFIRM IN THE AFFIDAVIT BELOW THAT S/HE IS A LEGAL RESIDENT OF THE UNITED STATES OF AMERICA, NOT A MINOR NOR A FELON WHOSE SIGNER: YOUR SIGNATURE, THE UNITED STATES OF AMERICA, NOT A MINOR NOR A FELON WHOSE SIGNER: YOUR SIGNATURE,								
SIGNER: YOUR SIGNATURE ON THIS PETITION MUST BE YOUR OWN AND DOES NOT SIGNIFY AN INTENT TO VOTE FOR THE CANDIDATE. YOU MAY SIGN PETITIONS FOR MORE OFFICE SIGNATURE OFFICE OFFICE								
USE ONLY	SIGNATURE OF REGISTERED VOTER [PRINT NAME IN SPACE BELOW SIGNATURE]	POST OFFICE BOXES ARE NOT ACCEPTABLE RESIDENCE ADDRESS House Number and Street Name or Rural Route and Box Number and City/Town	DATE SIGNED [Must be after January 1 of election year]	*SEE NOTE BELOW LAST 4 DIGITS OP SOCIAL SECURITY NUMBER [OPTIONAL]				
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	PRINT Painer Mehroal	CITYITOWN Richmond, VA 23220	1/1/1/1/1/10					
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16.	SIGN SANDERS SCHOOL SON	The state of the s	- man rate and management	Marintylik siinkkiin ja narissaa Maakkaliisistoja Fiyolik				
10.	PRINT Andron Hales	RESIDENCE 1/2 41.20 M St	4-1-16					
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	FRINT Bolenne McCarthy	RESIDENCE 8470 Wyndile Dr CHTYTONN Mechanics ville, NA	4/1/16					
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	PRINT JOSE M. GODINA	CITY/TOWN C: chinend VA	04/01/16					
19.	SIGN Dennis H. Howelf	RESIDENCE 3/6 W. 27 5+,	and the state of t					
	PRINT DENNIS H. HANDY	0 0	4/16					
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955	37219amond	swear or affirm that (i) my full re	esidential	CIRCULATOR'S DRIVER'S				
inite	in the County/City/Town of States of America. (iii) I am not a minor; (iv) I am not a the signature of each person who signed this page or it	ii) I am a legal	resident of	LICENSE NUMBER, IF APPLICABLE				
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ាក់ក	ionwealth of Virginia State of 1/5/#	TUPE OF PERSON CIRCULATING THE PETITION LL (A County/City of 15 (C) 11/M	nex "	IRCULATOR'S LAST 4 DIGITS OF SOCIAL SECURITY				
	The foregoing instrum	nepi was subscribed and sworn before me this		NUMBER				
	day of _(1911211 20 16, by						
	PRINT NAME OF PERSON	N CIRCULATING THE PETITION						
<u> </u>	ALL CALLICO CALLO CONTRACTOR OF NOTARY OR CTHER PERSON AUTHORIZED TO ADMINISTER OATHS	MATADY SCOUTTS TO MAIN						
	Selice. The Code of Victinia 88 94 9 506 and 64 6 for	NOTARY REGISTRATION NUMBER** DATE NOTARY COMMISSION	EXPIRES**					

Nacy notice: The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facilitate excing this petition with the official voter registration record. You are not required to provide this information and may sign the petition without the State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing

		COMMONWEALTH OF VIRGINIA PETITION OF QUALIFIED							
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ENTER A	BOVE, RESIDENCE ADDRESS OF CANDIDATE	munity or city. It is suggested that you use a separate petition form for qualified voters in each							
	337, garland and	county or filing.	city to facilitate	the processing of the					
ENTER A	BOVE, CITYTOWN Richmand Va 25-222	For a statewide office It is suggested that you file partitions in countyroty to facilitate the processing of the filing. If you track							
ENTER A	BOVE, OFFICE SOUGHT MANY	the number of signatures by congressional district enter district not:(optional)							
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	Alun Schintzus			r 'aw need not be on filon. Numerous					
side of I	COUNTY OR CITY OR, FOR TOWN COUNCIL, NAME OF TOWN his page, do hereby petition the above named individual to be	pages may be circulated. The circulator of each page must be a person who is her/himsel							
above i	n the [check only one]	a legal resident of the United States of America and who is not a minor nor a felon whose							
(General Election D Special Election Democratic Principles on the 2th day of Novembre	voting rights have not been restored. The							
	her name be printed upon the official ballots to be used at the	circulator also must swear or affirm in the afficavit inat s/he personally witnessed (he							
			signature of each voter						
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s	MINOR NOR A FELON WHOSE VOTING RIGHTS HAVE RATE BEIGHER: YOUR SIGNATURE ON THIS PETITION MUST BE YOUR DAWN	EN RESTORED AND THAT SIME PERSONALLY YET AND DOES MOT SIGNIFY AN INTENT TO MOTE FOR	458850 540 (148855)	TH SIGNATURS. DATE: YOU MAY S	अवस्य प्रकार १०१ ४०२				
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Ь	SIGN Tates Magan	RESIDENCE 14 G9 West 1000	7,50		:				
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* Privacy notice: The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security is									

* Privacy notice: The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security checking this petition with the official voter registration record. You are not required to provide this information and may sign the pe so. The State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the coil social security number or part thereof.

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Commonwealth of Virginia
Reg. #7527182
Commission Expires 11/30/2018

egoing instrument was subscribed and sworn before me this

PRINT NAME OF PERSON CIRCULATING THE PETITION

ELATURE OF NOTARY OR OTHER PERSON AUTHORIZED TO ADJANISTER GATHS HOTARY REGISTRATION NUMBER** DATE NOTARY COMMISSION EXPIRES** Privacy notice: The Gode of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facilitate cracking this position with the official voter registration record. You are not required to provide this information and may sign the petition without colors or the State Spart of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing

any social security number or part thereof

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	3321 garland are		county or filling.	r city to facilitat	e the processing of
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ENTER A	PONE OFFICE DOLLOUR A		to facilitat	e the processing	of the filing, if you in by congressional are
	BOVE, OFFICE SOUGHT MAYOR	ENTER ABOVE, DISTRICT, IF APPLICABLE	enter dist	dat no.: (ap	ionai)
We, the	qualified voters of the district in which the above condidate	seeks nomination or election and of	Ail eignot	uzon roquiro é la	v lay need not be s
	COUNTY OR CITY OR, FOR TOWN COUNCIL, NAME OF TOWN	signed hereunder or on the reverse	the same	pace of the pa	tition, Numerous
side of t	his page, do hereby petition the above named individual to b	ecome a candidate for the office stated	pages ma each page	ay be circulated le must be a ca	. The circulator of rean who is heritim
anove ii	n the [check only one] General Election Democratic Pri	į.	a legal re	sident of the U	Tited States স্থিতির
to be he	eld on the Dan day of Market	20 La and use do fi that politica	voting ria	his have not be	ion a ferom whose ion resigned. The
that his/	her name be printed upon the official ballots to be used at the	e election.	circulator affidavit i	laiso must swe hat sibe person	ar or affirm in the latty withessed the
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R 10.	SIGN Chas Mye	RESIDENCE 2517 F G.a.C.	5	3/20	
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COMMONWEALTH OF VIRGINIA

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9.711.23 4.444	ED FROM REVERSE SIDE CANDIDATE NAME: HC	ChinTZUS OFFICE SOUGHT: N	layor	
IRCULA SIG	TOR: MUST SWEAR OR AFFIRM IN THE AFFIDAVIT SELOW THAT S VOTING RIGHTS HAVE NOT BEEN RESTORED AND THAT S/ NER: YOUR SIGNATURE ON THIS PETITION MUST BE YOUR OWN THAN ONE CANDIDATE.	S/HE IS A LEGAL RESIDENT OF THE UNITED STATES OF AMERIC HE PERSONALLY WITNESSED EACH SIGNATURE. I AND DOES NOT SIGNIFY AN INTENT TO VOTE FOR THE CAND	A, NOTÁ MINOR I IDATE. YOU MAY	NOR A FELON WHOSE
FICE SE ;LY	SIGNATURE OF REGISTERED VOTER [PRINT NAME IN SPACE BELOW SIGNATURE]	POST OFFICE BOXES ARE NOT ACCEPTABLE RESIDENCE ADDRESS House Number and Street Name or Rural Route and Box Number and City/Town	DATE SIGNED [Must be after January 1 of election year]	*SEE NOTE BELOW LAST 4 DIGITS OF SOCIAL SECURITY NUMBER [OPTIONAL]
11.	PRINT Giber Cockett	RESIDENCE 2111 Dakwood In.	3/28/4	·
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13.	SIGN Janiel Rayenal	RESIDENCE 6 N DONLY AVE CITYTOWN RICHARDS VA 23221	3/28/16	ACTIONNA'S COMMINISTRATION OF THE STREET AND ACTION OF THE STREET AND ACTIONS ASSESSMENT AS A STREET AS A S
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8	ARINT LANGY BAKET	CITYTOWN FICHTURAL VA	3/28/16	
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E ₽4(°GK	CTOGRAPHICALLY REPRODUCIBLE TARY SEAL/STAMP BELOW State of LEGIS	TORE OF PERSON CIRCULATING THE PERTITION LLU County/City of HUMA	ns T	CIRCULATOR'S LAST 4 DIGIT OF SOCIAL SECURITY
Con Com	Reg. #7327182 / Cay of	ment was subscribed and sworn before the this 20 c by ON CIRCULATING THE PETITION	(NUMBER
<u>_/`</u> [u=1	ALC LO MODEL TO ADMINISTER OATHS	NOTARY REGISTRATION NUMBER** DATE NOTARY COMMISSION	th Gyppont*	

cheating this patition with the official voter registration record. You are not required to provide this information and may sign the petition without at 15th State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing

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$\sqrt{2}$.,	PRINT PAUL LEWIS	CHYTTOWN Richmond, VA	23220		Bijanda (m. 1971), kanala
5	2.	SIGN / M	RESIDENCE 1514 Ricksond	Vi.	4/10/16	
Ľ		PRINT LEAL PAGE	CITYTOWN Richmond			
	3.	SIGN (()	RESHOENGE /			Part 25 The American Control of Service Comments and Address a
L	J,	PRINT Karon Petning	CITY/TOWN		;	
Ų	Α	SIGN /L	RESIDENCE - 416 L.C.	5+	4/10/16	
	4.	PRINT Ander Michaels	CITATIONN WI harved		:	
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OFFICE USE ONLY	SIGNATURE OF REGISTERED VOTER [PRINT NAME IN SPACE BELOW SIGNATURE]	POST OFFICE BOXES ARE NOT ACCEPTABLE RESIDENCE ADDRESS House Number and Street Name or Rural Route and Box Number and City/Town	DATE SIGNED [Must be after January 1 of election year]	*SEE NOTE BELOW LAST 4 DIGITS OF SOCIAL SECURITY NUMBER [OPTIONAL]
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12.	AND HELDI RUDA	RESIDENCE 18/1 Maple Shurte LA	4.10.16	
15	SIGN KELLERY LOESES IM. HA PRINT KELLERY LIESES SIMIL'A	RESIDENCE 22047 Marshall CITYTOWN FILMMEN 137 2322	31/10/16	AND THE RESIDENCE OF THE PROPERTY OF THE PROPE
14.	ANT WILL Pre	CITYTOWN PICHMONG, VA	4/10/16	
19	HINT Shown Stone	RESIDENCE 3108 EMOUS hall CITYTOWN RICLAMMA VA 23,223	4/10/18	
10.	ANT Ejana Collaro	CITYTOWN SICLY CONTROL	9/10/6	
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110	30 () () () (-	RESIDENCE 5 15 291131	4/10/16	
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	wealth of Virginia (- Af	CHYTOWN RICHWICHID & 23226	4/10/16	
	Man Schintzick	swear cr affirm that (i) my full r in the State/Common ; (ii) I arn a legal felon whose voting rights have not been restored; an	esident(a) Iwealth of resident of Id (v) I affidavit is a	CIRCULATOR'S DRIVER'S LICENSE NUMBER, IF APPLICABLE LAME OF STATE THAT ISSUED THE CIRCULATOR'S DRIVER'S
408 2 4074	A. BEYTAS YAMA REPORT	NIPE OF PERSON CIRCULATING HE PETITION		LICENSE LACOR SLAST 4 DIGITS
NOT!	#75271#2 # Expires 11/30/2018 day of	County/City of //// neartwas subscribed and sworn before me this 20 /// by CIRCULATING THE PETITION	MIXA	OF SOCIAL SECURITY NUMBER .
Sivacy a	1.074.5 OR OTHER PERSON AUTHORNEO TO ADMINISTER DATHS OCIDA: The Ocide of Virginia, §§ 24.2-506 and 24.2-5.	HOTARY REGISTRATION NUMBER** DATE HOTARY COMMISSION	EXPIRES**	

caseding this patition with the official voter registration record. You are not required to provide this information and may sign the petition without acting so. The State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing

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01	ATOR: MUST SWEAR OR AFFIRM IN THE AFFIDAVIT BELOW THAT VOTING RIGHTS HAVE NOT BEEN RESTORED AND THAT SOURS SIGNATURE ON THIS PETITION MUST BE YOUR OW THAN ONE CANDIDATE.	SITE IS A LEGAL RESIDENT OF THE UNITED STATES OF AMERIN SI/HE PERSONALLY WITNESSED EACH SIGNATURE. IN AND DOES NOT SIGNIFY AN INTENT TO VOTE FOR THE CAND	CA, NOT A MINOR DIDATE. YOU MAY	NOR A FELON WHOSE Y SIGN PETITIONS FOR MORE
DEFICE USE ONLY	SIGNATURE OF REGISTERED VOTER [PRINT NAME IN SPACE BELOW SIGNATURE]	POST OFFICE BOXES ARE NOT ACCEPTABLE RESIDENCE ADDRESS House Number and Street Name or Rural Route and Box Number and City/Town	DATE SIGNED [Must be after January 1 of election year]	*SEE NOTE BELOW LAST 4 DIGITS OF SOCIAL SECURITY NUMBER [OPTIONAL]
11	PRINT LIVE A J CHICA	RESIDENCE 308 LU 3014	5/20	
12.	SIGN	RESIDENCE 300 W 30 F		
	PRINT WINGHEL GOTLAN	CITY/TOWN PVA	5/20	
i 13.:	SIGN CURLY Creften	RESIDENCE 3111 COVAJE ST	6/06	
	PRINT LASEY LYIDDE	CITY/TOWN Pulmed	7/20	
14.	FRINT Dorson (1884	RESIDENCE 3477 Strust Aug	Sto	
15.	SIGH I Jaw Calletto	RESIDENCE 2517 OVCUR AUR	Contraction of the last of the	
	PRINT Nancy Costello	CITYTOWN 7 V/A	s/20	
16.	SIGN MASS (STATE)	RESIDENCE 25/11 Crosse and		Class (Strips (Afficiality)) or Strips or Commission (Strips Cress construction)
	SIGN FICTENCE Breedlove	CITY/TOWN RVA 23220	7/20	
	PRINT / Mexice Scoolage	RESIDENCE 837 HAWHOTHO 1/6 43 CITYTOWN Rich., VA 13333	5/2/	
18 -	SIGH D. Pergran	RESIDENCE 1230 W. AVALE	70 MAY	
	PARIT D. J. Fagusan	CITYTOWN Richmond 23230	2016	
19.	SIGH Alphale le 27 pushing a	RESIDENCE JUG De 10 to 1)+	***************************************	
	PRINT HOLIAU Kaitanbaum	CHATTOWN RICHARD NIL VI 2722	20/5	r
20.	SIGN TATE	RESIDENCE 3406 W Crace St	5/20/	
	PRINT 1/55 Brooks	CITYTOWN RICHMONDUL 7501	16	
21	Sign Light And	RESIDENCE 3159 Pllud D	5/20/16	
mmc	PRINT Jenn Buch Inwealth of Virginia - A	FIDAVIT.	1/04/6	
	Han Schintzus		-	T64252950
united	in the County/City/Town of	swear or affirm that (i) my full in the State/Common (ii) I am a legal felon whose voting rights have not been restored; ar	wealth of l resident of	CIRCULATOR'S DRIVER'S LICENSE NUMBER, IF APPLICABLE
чуй Бас	rishable by a maximum fine up to \$2,500 and/or impriso		affidavit is a	NAME OF STATE THAT ISSUED THE CIRCULATOR'S DRIVER'S
1:5°	TOGRAP CALLY REPRODUCIBLE SIGNATORY SEAL STAMP BELOW. State of ULCG	Thre of Person Circulating the Petition (Ma County/City of Recomme	2	CIRCULATOR'S LAST 4 DIGITS OF SOCIAL SECURITY NUMBER
	The foregoing instrur	ment was subscribed and sworn before me this	The state of the s	וזטאטכע
	asan sch	Princette Iren	e Clarke	
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Every nation. The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facilitate necking this pacition with the official voter registration record. You are not required to provide this information and may sign the petition without the State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing special security number or can thereof.

0	Alan Schintzius	DCDate-law column		MMONWEALTH TION OF VOTE	QUALIFIED
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We, the qualified voters of the district in which the above candidate see COUNTY OR CITY OR, FOR TOWN COUNCIL, NAME OF TOWN side of this page, do hereby petition the above named individual to becor above in the [check only one] General Election Special Election Democratic Primar to be held on the Agree Agree day of Agree Ward at the election that his/her name be printed upon the official ballots to be used at the election to the control of the country of the country of the control of the country of the control of the country of the countr		signed hereunder of on the reverse secome a candidate for the office stated mary Republican Primary 20 (6, and we do further petition	All signatures required by law need not be on the same page of the petition. Numerous bages may be circulated. The circulator of each page must be a person who is herbitral legal resident of the United States of Amerond who is not a minor nor a faion whose voting rights have not been restored. The circulator also must smear or affirm in the affidavit that she bersonal it witnessed that signature of each voter.		
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* Privacy notice: The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to fact checking this petition with the official voter registration record. You are not required to provide this information and may sign the petition without c so. The State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column contaming social security number or part thereof.

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way notice: The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facilitate security in the principle of the petition with one official voter registration record. You are not required to provide this information and may sign the petition without angles. The State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing a state security number or part thereof

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5	9.	SIGN Matallebrich	RESIDENCE 3011 E. Brock S.		₹ *
r		PRINT Natalie Snider	CITYTOWN RICHMONE, VA	23223	5 5 20 16
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13.	PRINT John METHER FILLER	CITY/TOWN R. VA	7/25/16	
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THE PERSONNELS AND	EST NOTATION OR OTHER PERSON AUTHORIZED TO ADMINISTER CATHS	HOTARY REGISTRATION NUMBER DATE NOTARY COMMISSION	G. #2037191	'SIAIA
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		COUNTY OR CITY OR, FOR TOWN COUNCIL, NAME OF TOWN	signed hereunder or on the reverse	the same	page of the ps	lition. Numerous . The circuistor of
side abo	of th	is page, do hereby petition the above named individual to be the [check only one]		each page	e must be a pe	son who is herhimse thed States of Americ
		General Election	mary Republican Primary	and who i	s not a minor n	or a felon whose
to b	e hel	on the QM day of ArovenDer	, 20 6 and we do further petition			en restored. <u>The</u> ar or affirm in the
ulat	msn	er name be printed upon the official ballots to be used at the	e election.		nat s/he person of each voter.	ally witnessed the
Cir	OLG A	TOD, MILOT CHEAD OF ACTION OF THE COMME	į			
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	SIG	NER: YOUR SIGNATURE ON THIS PETITION MUST BE YOUR OWN. THAN ONE CANDIDATE.	RCP STOVICT THETA, NA YRINDIS TON SBOD DNA	THE CANDI	DATE. YOU WAY S	1014 PCF 8;10(F)TEG MEN
OFF				1	DATE	
ON			POST OFFICE BOXES ARE N	ICT	SIGNED (Must be	* SEE NOTE BELOW
V			ACCEPTABLE RESIDENCE ADDRESS		after January 1	LAST 4 DIGITS O SOCIAL SECURIT
		SIGNATURE OF REGISTERED VOTER [PRINT-NAME IN SPACE BELOW SIGNATURE]	House Number and Street Name or Rural Route and Box Number and City 7		of election vear	HUMBER (centernel)
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Ĭ	2	SIGN (RESIDENCE SA LOSA 23		4/=/:+	
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K	3.	SIGN 1	RESIDENCE 25/3 F. GCAC	<u> </u>	1.7	
1		PRINT BILLY INDICATION	CITY/TOWN ZICHTELDY	V)	13/2/	
8	4.	SIGNATURA TOLOGO PO	RESIDENCE HETRICO		; :	
Ø		PRINTEDACIO GARARZA	SSIZEAMTEY PONDETT 2323	33		
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1-	6.	PRINT JOSHU Adams	CINTON RELAMINA 23	32/9	1/3/4	
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* Privacy notice: The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facilita checking this petition with the official voter registration record. You are not required to provide this information and may sign the petition without points. The State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing an social security number or part thereof.

<u>ک</u>			5 8 V	PET	OMMONWEAL	TH OF VIRGINIA QUALIFIED
ENTER ABOVE, NAME DE CANDIDATE [SHOULD BE AS IT IS TO APPEAR ON BALLOT]				VOTERS [Must be filed with Declaration of Candidacy]		
ENT	TER A	BOVE, RESIDENCE ADDRESS OF CANDIDATE	W 00 00 00 00 00 00 00 00 00 00 00 00 00	/USILY LI	1 (31V. II IS SIV	includes more than one gested that you use a qualified voters in each
ENT	TER A	321 Garland aux	Trenmend of the do	ounty or ng.	r city to facilitai	ie the processing of the
		MAYOR	Q) ((racilitat	e the processing	ile pelitions in county/city
lo Malana	-	BOVE, OFFICE SOUGHT	ENTER ABOVE, DISTRICT, IF APPLICABLE 60	e numb	er of signatures not no.; [op	by congressional district
We, the qualified voters of the distriction which the above candidate COUNTY OR CITY OR, FOR TOWN COUNCIL, NAME OF TOWN side of this page, do hereby petition the above named individual to be above in the (check only one) General Election Special Election Democratic Print to be held on the day of that his/her name be printed upon the official ballots to be used at the			signed hereunder or on the reverse page of the page of	All signatures required by law need not be of the same page of the petition. Numerous pages may be circulated. The circulator of each page must be a person who is herhim a legal resident of the United States of Ame and who is not a minor nor a felon whose voting rights have not been restored. The circulator also must swear or affirm in the affidavit that s/he personally witnessed the signature of each voter.		
	SIC	ATOR: MUST SWEAR OR AFFIRM IN THE AFFIDAVIT ON THE REVE MINOR NOR A FELON WHOSE VOTING RIGHTS HAVE NOT BE SNER: YOUR SIGNATURE ON THIS PETITION MUST BE YOUR OWN THAN ONE CANDIDATE.				
IJ	FICE SE ILY	SIGNATURE OF REGISTERED VOTER	POST OFFICE BOXES ARE NO ACCEPTABLE RESIDENCE ADDRESS House Number and Street Name or	-	DATE SIGNED [Must be after January 1 of election	*SEE NOTE BELOW LAST 4 DIGITS OF SOCIAL SECURITY NUMBER
R	C Broad Se	[PRINT NAME IN SPACE BELOW SIGNATURE]	Rural Route and Box Number and City/Town RESIDENCE 37/4 (W/G St. 16	n /	year]	[OPTIONAL]
Λ.	1.	PRINT JOHN M. VUSSAY	RESIDENCE 5/19/CUTY St. 19 CITYTOWN KICH, VOL 23	131	425/16	
R	2.	SIGN The Are Hallow an	RESIDENCE 3108 EUS OW AVE	-	4/2-1	वर्षः सम्बद्धाः १९ मान्यः १९ राज्येश्वर्यः सम्बद्धाः सम्बद्धाः सम्बद्धाः सम्बद्धाः सम्बद्धाः सम्बद्धाः सम्बद्ध
		PRINT ANTA HOLLOWAN	CITYTOWN RICH MOND, VA 2828	NAME OF STREET	1/25/16	स्थापः स्ट. १७ ६-१ में हास्तिन स्ट.गेर्डावेट स्ट्राप्ता अपनी वेदिन हो स्ट्राप्ता (१८ द्वाराणः)
/	3,	PRINT THE A Rown	RESIDENCE 3/30 GV + FIM AC CITYTOWN RICLLAND WIESS		1/25/16	<u></u>
J.	4.	sign Yora Allen	RESIDENCE 1705 WINDYOW			ARCASE PERCENTANTALAN ARCAMENTANTANTANTANTANTANTANTANTANTANTANTANTAN
<u>()</u>		PRINT SIGH & WECKELA	CITYTOWN Richmond NA-2		1/25/16	age and in wanty and a secular deposit of the water of commentation deposition.
Ÿ	5.	error Samantha Utiker	RESIDENCE 1701 Summit Ave-1		4/25	
P	6.	SIGH DOKALL PRINT JEWSLACK	RESIDENCE 306 VJ 781 CA		4/25/16	and the second s
		SIGN SIMULDI OU QUELD	CITYTOWN KYA 23223 RESIDENCE 1224 RUILING	1 (-	THE RESERVE THE PROPERTY OF THE PERSON OF TH	angeria - Lez-Ar cente Albahamana mangangan menjeri
77	7.	PRINT MICHELL OWEN,	CITY/TOWN KINT 7312		4/35/6	:
214	8.	SIGN Phillip Prix	RESIDENCE	- Company		The train an action of the property of the pro
		PRINT PHILL PRIVE	CHYTOM GIOL World C		4-246	and the second s
K	9.	son Kathenne CTerrit in	RESIDENCE 3414 COPEY Rd	2-7 -7 -7	- 4/25h	
	10	SIGN PARTICIPATE & france	CITYTOWN KICHMAND VA 23 RESIDENCE 609 E BRECKIANA	Programme and the	17/10	The state of the s
	10.	PRINT DER PARTY MATOR LAM	CITYTIONIN RICHARDENEL CAS	H2Z	4/2/16	

Privacy notice: The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facilitate checking this petition with the official voter registration record. You are not required to provide this information and may sign the petition without doing so. The State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing any social security number or part thereof.

CONTINU	ED FROM REVERSE SIDE CANDIDATE NAME:	Schintzickoffice sought:	Wayo/			
	NTOR: MUST SWEAR OR AFFIRM IN THE AFFIDAVIT BELOW THAT S/HE VOTING RIGHTS HAVE NOT BEEN RESTORED AND THAT S/HE BNER: YOUR SIGNATURE ON THIS PETITION MUST BE YOUR OV/N A THAN ONE CANDIDATE.	PERSONALLY WITNESSED EACH SIGNATURE.				
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<u>(</u>) 12.	SIGNACIENT W. Educardo Gr.	RESIDENCE 320H Midlethian Turnpi CITY/TOWN Apt P. Richwood, 10,23	224			
R 13	SIGN MULTE PRINT NY GOULE	CHYTTOWN QILM, VA. Z3ZZ	z 5/14/10			
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16	PRINT Jacques Snydir	CITY/TOWN RICHINGT day / A 232 PRESIDENCE 3110 CAROLINA Proc.	15/14/14 124			
17	BIGN CAMPA DARY	CITY/TOWN RICL, UP 23222 RESIDENCE 210 / 405 CT	3/14/16			
$\frac{1}{\ell} \frac{18}{19}$	PRINT L JAMIPS MUSES	CITYTOWN US IND	3/19/1			
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Com	PRINT XMETTIG ZU(Ci)S' monwealth of Virginia - A Alan Schintzius	FFIDAVIT - , swear or affirm that (i) my fi		764252950 CORCULATOR'S DRIVER'S		
the Ui		in the State/Comm (ii) I am a le	nonwealth of gal resident of and (v) !	LICENSE NUMBER, IF APPLICABLE VA		
felony	punishable by a maximum fine up to \$2,500 and/or impris	CONTROLLUP TO LON YEARS. WHURE OF PERSON CIRCULATING THE PETITION		THE CIRCULATOR'S DRIVER'S LICENSE 11.9 \$ CIRCULATOR'S LAST 4 DIGITS		
	State of VRy unca County/City of Rechard NUMSER The foregoing instrument was subscribed and sworn before me this					
— 七	A La M Schint 2 LUS PRINT NAME OF PERSON CIRCULATING THE PETITION PRINT NAME OF PERSON CIRCULATING THE PETITION ROTARY PUBLIC COMPANY PUBL					
	CREOF HOTAFI OR OTHER PERSON AUTHORIZED TO ADMINISTER OATH		SION EXPIRES	i B/31/2018		

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Lies Anne Cosby NOTARY PUBLIC Commonwealth of Virginia Reg. #7527182 Commission Expires 11/30/2018 going instrument was subscribed and sworn before me this day of 20 1/2, by 16 Carco YUNI) + ZLCE PRINT NAME OF PERSON CIRCULATING THE PETITION SHIPS DE LOS TESTING TO SELECT SERVICE TO SELECT TO SELECT AT DE SELECT AT LES SELECT

NOTARY REGISTRATION NUMBER** DATE NOTARY COMMISSION EXPIRES** rivacy notice. The Code of Virginia, §§ 24.2-586 and 24.2-521, authorizes requesting the last four digits of your social security number to facilitate necking this petition with the official voter registration record. You are not required to provide this information and may sign the petition without angisa. The State Board of Elections or the General Registrar, when copying this documen, for public inspection, must cover the column containing

ny social security number or part mereci

				PETITION OF QUALIFIED		
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		3321 garland au	<u>ر</u> ۱	ounty or ling	city to facilitate	the propessing of in-
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ENT	ER AB	OVE, OFFICE SOUGHT NOW IN-			er of signatures of no.: (opti	py congressional distritional).
We,	the	qualified voters of the district in which the above candidate	1 ^			r law need not be on
		COUNTY OR CITY OR, FOR TOWN COUNCIL, NAME OF TOWN				ition. Numerous The circulator of
side	of th	nis page, do hereby petition the above named individual to be the [check only one]	ecome a candidate for the office stated	ach pag	e must be a per	son who is her himse ited States of Americ
auc		General Election	mary Republican Primary	na who i	s not a minor n	or a feion whose
	e hel	d on the day of	, 20, and we do further petition v			en restored. <u>The</u> ar or affirm in the
tha	t his/t	ner name be printed upon the official ballots to be used at the	1 =		nat s/he person of each voter.	ally witnessed the
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		SIGN Khut	RESIDENCE 4611 DECLUSIVE			\$ ************************************
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	2.	SIGN O Count Houghon	RESIDENCE 4503 New Kart	(Aug	l Dev 1	
R		PRINT D Janet 44.	CHYTOMI RY LIVERS VA		1-17	: : ::::::::::::::::::::::::::::::::::
Š.	3.	SIGN (13.5 GARAGE) (MACT)	RESIDENCE		4,3.16	
Ø		PRINTCATEGRAP OVERSTON	CITY/Town			manuganan, pana
	4	SIGN JULY POLO	RESIDENCE 1430 Lever Residence 147	τ	F 1-34	
R		PRINT SUZAUNE I KELLEY	CITYTOWN Richmond, W.	23,77	Man 19, 216	oc rema
	5.	SIGN Bedha Murin	RESIDENCE 3107 STUART		- - آند ل.	
K		PRINT BETH BHUSSES	CITYTOWN PUELZNEZZ		12:12	<u> </u>
	6.	SIGN	RESIDENCE 1913 (106-PINO)	-	11/5/	· /
R		PRINT (19/05-1)25/5/5/	Стулочи О- 2-3 7-2-1		17211	(i)
e,	7.	SIGN fine of Come	RESIDENCE Westmiastry		4/21.	
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	8	SIGN A COLK LAT	RESIDENCE 3211 NULL Que	! 	i alsi .	
-		PRINT Wode K. Smith	CHYTOMN Richmond JA 23		1 4 3 13	
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(*		PRINT DIGNU (0/2	CITYTOWN Richmond, VI	723.	777	

5 * Privacy notice: The Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security checking this petition with the official voter registration record. You are not required to provide this information and may sign the p: so. The State Board of Elections or the General Registrar, when copying this document for public inspection, must cover the column containing social security number or part thereof.

CONTINUE ADDITIONAL SIGNATURES AND COMPLETE AFFIDAVIT

TITLED FROM RECERSE SIDE CANDIDATE NAME:	51 15	A1 1. 1	
ROULATOR: MUST SWEAR OR AFFIRM IN THE AFFIDAVIT BELOW THAT VOTING RIGHTS HAVE NOT DEED DESTROYS AND THAT	S/HE IS A LEGAL RESIDENT OF THE UNITED STATES OF AMERIC S/HE PERSONALLY WITNESSED EACH SIGNATURE, IN AND DOES NOT SIGNIFY AN INTENT TO VOTE FOR THE CAND	A, NOT A MINOR P	NOR A FELON WHOSE SIGN PETITIONS FOR MORE
SIGNATURE OF REGISTERED VOTER [PRINT NAME IN SPACE BELOW SIGNATURE]	POST OFFICE BOXES ARE NOT ACCEPTABLE RESIDENCE ADDRESS House Number and Street Name or Rural Route and Box Number and City/Town	DATE SIGNED [Must be after January 1 of election year]	*SEE NOTE BELOW LAST 4 DIGITS OF SOCIAL SECURITY NUMBER [OPTIONAL]
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12. SIGN TO THE PRINT SEPTEMBER 19 MAKE MAKE MAKE MAKE MAKE MAKE MAKE MAKE	RESIDENCE V CITY/TOWN V	4/10/15	
13 SIGN In & Bujus PRINT TIMO + BUILDO	RESIDENCE RICHMOND CITYTOIN RICHMOND, WA	4/10/16	(
14. SON SALVEZ K. RUGO	RESIDENCE RICHAMIN IA CITYTOWN MIMAGLE Shall Care	4/10/16	antaing themasure
15 SIGN WM MES	RESIDENCE 10.5 14/15; CITY/TOWN R. M.	4/10/16	Photosis bangkarana C
18. SIGN Best Tolende) PRINT Seatt Jankersley	RESIDENCE 3000 W. Grace St. #302 CITY/TOWN R. Chmood VA 23221	4/10/16	esukusud SAT-Teografianus
17 SIGN 89 400 FRINT BOY GOOD 110	RESIDENCE THE Gran is Hall alle CITYLTOWN R. Sharred 19, 23725	Vivio	r Marind
18. SON THE PROPERTY OF WARRING TO SEE STATE OF WARRIN	RESIDENCE DE L'AMONO LA	110	Manufacture Name of Street, St
est Market 17. WAY	RESIDENCE 2 10 1 Plachwood No CITYTOWN Sich and Why 2322	1/10/14	covind simple production
But lees Humber	RESIDENCE 1521 1:11 51	4 10.16	7
son them we share the	RESIDENCE 7108 6 1075101154. CITY/TOWN F1(+1-111-1/1) A	4/10/16	
nmonwealth of Virginia Stylz 15	FFIDAVIT - swear or affirm that (i) my full	residential	TBQ 75295
in the County/City/Town of in the County/City/Town of chited States of America; (iii) I am not a minor; (iv) I am not a sessed the signature of each person who signed this page or	in the State/Common	nwealth of it resident of ind (v) I	LICENSE NUMBER, IF APPLICABLE
, purisnable by a maximum fine up to \$2,500 and/or imprish EPHOTOGRAPHICALLY REPRODUCIBLE	priment up toden years.	anioavit is a	NAME OF STATE THAT ISSUED THE CIRCULATOR'S DRIVER'S LICENSE
Control State of Stat	A THE OF PERSON CIRCULATING THE PETITION LA LA County/City of 10/1/2	408	CIRCULATOR'S LAST 4 DIGITS OF SOCIAL SECURITY NUMBER
Commission Expires 11/20/2018	Iment was subscribed and sworn before me this		

Laboration number: Date notary commission expires**

Laborator Code of Virginia, §§ 24.2-506 and 24.2-521, authorizes requesting the last four digits of your social security number to facilitate about 10 to 10

ENTER ABOVE, NAME OF CANDIDATE (SHOULD BE AS IT IS TO APPEAR ON BALLOT) ENTER ABOVE, RESIDENCE ADDRESS OF CANDIDATE 33 2 Garland Cive R, Va 23222 ENTER ABOVE, CITY/TOWN ENTER ABOVE, OFFICE SOUGHT ENTER ABOVE, OFFICE SOUGHT We, the qualified voters of the district in which the above candidate seeks nomination or election and of signed hereunder or on the reverse side of this page, do hereby petition the above named individual to become a candidate for the office stated				PETITION OF QUALIFIED VOTERS [Must be fled with Declaration of Candidad] When an election district includes more than a county or city, it is suggested that you use separate defition form for qualified votes in all county or city to facinitie the processing of filling. For a sistemide office it is suggested that you fill neithors in county to facilitate one processing of the filling. If you in the number of signatures by congress that disenter district no			
above in the [check only one] General Election				, and we do further petition election.	and who is voting rich circulator affidavit the signature	s not a minor no nts have not be also must swee nat sine person of each voter	ar or aritmen the aim virtuussed inc
•			TOR: MUST SWEAR OR AFFIRM IN THE AFFIDAVIT ON THE REVER MINOR NOR A FELON WHOSE VOTING RIGHTS HAVE NOT BEI NER: YOUR SIGNATURE ON THIS PETITION MUST BE YOUR OWN A THAN ONE CANDIDATE.	EN RESTORED AND THAT SIME PERSONALLY WIT	NESSED EAC	H SIGNATURE. DATE: YOU NAME S	
	OFFICI USE ONLY	١	SIGNATURE OF REGISTERED VOTER (PRINT NAME IN SPACE BELOW SIGNATURE)	POST OFFICE BOXES ARE ACCEPTABLE RESIDENCE ADDRESS House Number and Street Name C Rural Route and Box Number and City) r	DATE SIGNED [Must be after January f of election year]	TSSE NOTE SELC LAST 4 CIGHTS SOCIAL SECUF NUMBER TOT CLAU
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1	0	2.	sign Milarie Seavs	RESIDENCE 2319 Park IT	_ [4.10 16	
		3.	SIGN Adelheid R. Lewis	RESIDENCE 1721 GOVE AVE		14-10-15	
		4.	SIGN Roberto Jon	RESIDENCE	<u> </u>	4.10%	
		5.	SIGN CO. 1 14 Walker	RESIDENCE V Chronille	<u> </u>		: - - :
ľ	1/		PRINT	City/Town	<i>,</i>	-	cine:
	Q.	6.	SIGN Stacked Contraction	RESIDENCE / 23		1	
	6	7.	sign (Q)	RESIDENCE TOWN TO CONTROL	. Sr		
	Ó	8.	SIGN Zrubreto p	RESIDENCE STUD DWG / S.A.	L		
	1		PRINT ZVIN BISING	CITY/TOWN PV/A) RESIDENCE (012 V Z2 H	*	7 10.	Company of the particular control of the company of
	X	<i>)</i> 9.	SIGN UT			4/10/6	冷转
-			PRINT L V20 (FCC)	CHYTTOWN RET LACT			

COMMONWEALTH OF VIRGINIA

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AND DESCRIPTIONS	ed from reverse side. CANDIDATE NAME: <u>#</u> 0	un Schintausbffice sought:	Mayor	
Sid	NTOR: MUST SWEAR OR AFFIRM IN THE AFFIDAVIT BELOW THAT S VOTING RIGHTS HAVE NOT BEEN RESTORED AND THAT S/ YOUR SIGNATURE ON THIS PETITION MUST BE YOUR OWN THAN ONE CANDIDATE.	S/HE IS A LEGAL RESIDENT OF THE UNITED STATES OF AMERIC HE PERSONALLY WITNESSED EACH SIGNATURE. I AND DOES NOT SIGNIFY AN INTENT TO VOTE FOR THE CAND	CA, NOT A MINOR I	NOR A FELON WHOSE SIGN PETITIONS FOR MORE
FFICE USE SILLY F	SIGNATURE OF REGISTERED VOTER [PRINT NAME IN SPACE BELOW SIGNATURE]	POST OFFICE BOXES ARE NOT ACCEPTABLE RESIDENCE ADDRESS House Number and Street Name or Rural Route and Box Number and City/Town	DATE SIGNED [Must be after January 1 of election year]	*SEE NOTE BELOW LAST 4 DIGITS OF SOCIAL SECURITY NUMBER [OPTIONAL]
17	PRINT WE STEEL SON	RESIDENGE 24 CITY/TOWN	4/9/16	
12.	PRINT KARA N. Call	RESIDENCE / 7/9 TUSTIGE AVE CITYTOWN RCLUME (LA 2007)	4/9/10	
13	SIGN - TO CHELLAN BUNGET	RESIDENCE 17 19 AND VALLE FULL CITYTOWN RICHMANN 23227	4/9/6	Canara Principal Andrews and Spain September 2014 (1994). September 2014 (1994)
14.	BRIEF SORENSEN	CITYTOWN R. Charley Va 27	APV 10/1	
15.	SIGN - SWIEN WARK	RESIDENCE 421 N POLICYANA CITYTOMN FICHYMORYL VA	April 6	uste. A Marcial de Santi-marcia de Laboratoria de Caracteria de Caracter
16.	SIGN BLOWNY HAITS	RESIDENCE 2923 FLOYD AVE CITYTOWN ZICHMUM, VA	4/10/16	nones ground
17.	PRINT EDWOID NEWS	RESIDENCE 3200 Ellwodfue for C CITYTOWN GUMMONU VA 2322)	4/0/16	(
18	By grate Docely	RESIDENCE SUIZ Park A	5 410/6 126	
19	SIGN WAR A RY- PAUN USS MARIZON	RESIDENCE 2415 (NOVE, AVENU CITYTOWN RICHMOND, VA	e 416/16 2322	<u> </u>
20.	SIGN OF STEEL OF MARKET	RESIDENCE POL W LINCASTA, Pot CITYTOWN RICHMOND VA 232	22 4/1/1	Head of the second
21.	SIGN STIVER PERSINGER	RESIDENCE 1215 Williams burg	Ave. 4/10/16	odinerii (Arques
Cress	ALL SCHATZIUS,	FFIDAVIT - , swear or affirm that (i) my full	residential	CIRCULATOR'S DRIVER'S
ಚರತಿಕ	in the County/City/Town of a States of America; (iii) I am not a minor; (iv) I am not a cite signature of each person who signed this page or included by a maximum fine up to \$2,500 and/or impriso	felon whose voting rights have not been restored; a	al resident of	NAME OF STATE THAT ISSUED THE CIRCULATOR'S DRIVER'S UCENSE.
	THRY SEALISTANG BELOW:	TURE OF PERSON CIRCULATING THE PERITION LILL County/City of JULIANIA		CIRCULATOR'S LAST 4 DIGITS OF SOCIAL SECURITY
Co	Notary Public Notary Public The foregoing instrument of Virginia Reg. 87527182 Gay of 1 Annual Control of	ment was subscribed and sworn before me this	(<u> </u>	NUMBER .
Tivan	DE CTUP SECTOR PER PERSON AUTHORIZED TO ADMINISTER DATHS Author: The Code of Virginia, 38 24.2-508 and 24.2-6	NOTARY REGISTRATION NUMBER** DATE NOTARY COMMISSI	ON EXPIRES**	engga angang pengahan angang anga
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		COUNTY OR CITY OR, FOR TOWN COUNCIL, NAME OF TOWN	signed hereunder or on the reverse	the same	page of the pat	illion. Mumerous The circulator of
side abo	of th ve in	is page, do hereby petition the above named individual to be the [check only one]	ecome a candidate for the office stated	each page	e must be a per	son who is her/him
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		on the <u>STM</u> day of <u>MGU</u> er name be printed upon the official ballots to be used at the	, 20 <u>l.()</u> , and we do further petition election.	circulator	also must swea	ar or affirm of the above the
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ENTER ABOVE, NAME OF CANDIDATE (SHOULD BE AS IT IS TO APPEAR ON BEATTER ABOVE, RESIDENCE ADDRESS OF CANDIDATE ENTER ABOVE, CITY/TOWN We, the qualified voters of the district in which the above candidate section of this page, do hereby petition the above named individual to be above in the [check only one] General Election Special Election Democratic Print to be held on the day of day of the district in which the above named individual to be the held on the day of day of the printed upon the official ballots to be used at the	PETITION OF QUALIFIED VOTERS [Must be filed with Declaration of Cendrost, When an election district induces more than a county or city, it is suggested that not use separate petition form for out-lifed loters in a county or city to facilitate the processing of filing ———————————————————————————————————			
CIRCULATOR: MUST SWEAR OR AFFIRM IN THE AFFIDAVIT ON THE REVER MINOR NOR A FÉLON WHOSE VOTING RIGHTS HAVE NOT BES SIGNER: YOUR SIGNATURE ON THIS PETITION MUST BE YOUR OWN A THAN ONE CANDIDATE.	EN RESTORED AND THAT SIHE PERSONALLY WIT	NESSED EAC	H SIGHATURE	
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COMMONWEALTH OF VIRGINIA

CONTINUE ADDITIONAL SIGNATURES AND COMPLETE AFFIDAVIT ON REVERSE S

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	Alan Schintzius			MONWEALTH OF VIRGINIA TION OF QUALIFIED VOTERS
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D 6	SIGN SECTION	RESIDENCE 307 Strc4	7676	5-
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