UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DCCC,

Plaintiff,

v.

PETER S. KOSINSKI, in his official capacity as Co-Chair of the State Board of Elections; DOUGLAS A. KELLNER, in his official capacity as Co-Chair of the State Board of Elections; ANDREW J. SPANO, in his official capacity as Commissioner of the State Board of Elections; TODD D. VALENTINE, in his official capacity as Co-Executive Director of the State Board of Elections; and KRISTEN ZEBROWSKI-STAVISKY, in her official capacity as Co-Executive Director of the State Board of Elections,

Defendants,

and

REPUBLICAN NATIONAL COMMITTEE, NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE, and NEW YORK REPUBLICAN STATE COMMITTEE,

Proposed Intervenor-Defendants.

Case No. 1:22-cv-1029-RA

MEMORANDUM OF LAW IN SUPPORT OF MOTION TO INTERVENE

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The Court should allow Movants—the Republican National Committee, National Republican Congressional Committee, and New York Republican State Committee—to intervene as defendants in this case. If New York is violating its election laws, then it should stop. But Plaintiff's lawsuit goes much further: It tries to *change* New York's election laws by invalidating several existing statutes. *See, e.g.*, Compl. ¶¶62-66 (challenging the law that rejects non-postmarked ballots arriving more than one day after the election); ¶¶67-93 (challenging the law that permits an opportunity to cure only certain defects). Movants seek leave to intervene so they can resist Plaintiff's attempt to use federal litigation to upend the State's legislatively enacted rules.

As Plaintiff itself has observed, "political parties usually have good cause to intervene in disputes over election rules." *Issa v. Newsom*, Doc. 23 at 2, No. 2:20-cv-1044 (E.D. Cal. June 8, 2020). That is why, in recent litigation over the election rules for 2020 and 2021, the Democratic and Republican parties were virtually always granted intervention.[*] This Court should do the same for two independent reasons.

First, Movants satisfy the criteria for intervention as of right under Rule 24(a)(2). Their motion is timely: Defendants have yet to file an answer, this litigation has yet to begin in earnest, and no party will possibly be prejudiced. Movants also have a clear interest in protecting their candidates, voters, and resources from Plaintiff's attempt to invalidate New York's duly enacted election rules. Finally, no other party adequately represents Movants' interests. Defendants do not share Movants' distinct interests in conserving their resources and helping Republican candidates and voters.

Second, and alternatively, the Court should grant Movants permissive intervention under Rule 24(b). Again, this motion is timely. Movants' defenses share common questions of law and fact with the existing parties, and intervention will result in no delay or prejudice. The Court's resolution of the

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[*] *See, e.g.*, *Mi Familia Vota v. Hobbs*, 2021 WL 5217875 (D. Ariz. Oct. 4) (granting intervention to RNC, NRSC, DSCC, and DCCC); *New Georgia Project v. Raffensperger*, 2021 WL 2450647 (N.D. Ga. June 4) (granting intervention to RNC, NRSC, Georgia Republican Party, and NRCC); *Black Voters Matter Fund v. Raffensperger*, No. 1:20-cv-4869-SCJ, Doc. 36 (N.D. Ga. Dec. 9, 2020) (granting intervention to RNC and Georgia Republican Party); *Alliance for Retired Americans v. Dunlap*, No. CV-20-95 (Me. Super. Ct. Aug. 21, 2020) (granting intervention to the RNC, NRSC, and Republican Party of Maine); *Mi Familia Vota v. Hobbs*, Doc. 25, No. 2:20-cv-1903 (D. Ariz. June 26, 2020) (granting intervention to the RNC and NRSC); *Ariz. Democratic Party v. Hobbs*, 2020 WL 6559160 (D. Ariz. June 26, 2020) (granting intervention to the RNC and Arizona Republican Party); *Swenson v. Bostelmann*, Doc. 38, No. 20-cv-459-wmc (W.D. Wis. June 23, 2020) (granting intervention to the RNC and Republican Party of Wisconsin); *Edwards v. Vos*, Doc. 27, No. 20-cv-340-wmc (W.D. Wis. June 23, 2020) (same); *League of Women Voters of Minn. Ed. Fund v. Simon*, Doc. 52, No. 20-cv-1205 ECT/TNL (D. Minn. June 23, 2020) (granting intervention to the RNC and Republican Party of Minnesota); *Issa v. Newsom*, 2020 WL 3074351, at *4 (E.D. Cal. June 10, 2020) (granting intervention to the DCCC and Democratic Party of California); *Nielsen v. DeSantis*, Doc. 101, No. 4:20-cv-236-RH (N.D. Fla. May 28, 2020) (granting intervention to the RNC, NRCC, and Republican Party of Florida); *Priorities USA v. Nessel*, 2020 WL 2615504, at *5 (E.D. Mich. May 22, 2020) (granting intervention to the RNC and Republican Party of Michigan); *Thomas v. Andino*, 2020 WL 2306615, at *4 (D.S.C. May 8, 2020) (granting intervention to the South Carolina Republican Party); *Corona v. Cegavske*, Order Granting Mot. to Intervene, No. CV 20-OC-644-1B (Nev. 1st Jud. Dist. Ct. Apr. 30, 2020) (granting intervention to the RNC and Nevada Republican Party); *League of Women Voters of Va. v. Va. State Bd. of Elections*, Doc. 57, No. 6:20-cv-24-NKM (W.D. Va. Apr. 29, 2020) (granting intervention to the Republican Party of Virginia); *Paher v. Cegavske*, 2020 WL 2042365, at *2 (D. Nev. Apr. 28, 2020) (granting intervention to four Democratic Party entities); *Democratic Nat'l Comm. v. Bostelmann*, 2020 WL 1505640, at *5 (W.D. Wis. Mar. 28, 2020) (granting intervention to the RNC and Republican Party of Wisconsin); *Gear v. Knudson*, Doc. 58, No. 3:20-cv-278 (W.D. Wis. Mar. 31, 2020) (same); *Lewis v. Knudson*, Doc. 63, No. 3:20-cv-284 (W.D. Wis. Mar. 31, 2020) (same).

important questions in this case will have major implications for Movants as they work to ensure that candidates and voters can participate in fair and orderly elections.

Whether under Rule 24(a)(2) or (b), Movants should be allowed to intervene as defendants. Plaintiff objects to this motion. Defendants have not yet given their position.

INTERESTS OF PROPOSED INTERVENORS

Movants are political organizations who support Republicans in New York. The Republican National Committee is a national committee, as defined by 52 U.S.C. §30101, that manages the Republican Party's business at the national level, supports Republican candidates for public office at all levels, coordinates fundraising and election strategy, and develops and promotes the national Republican platform. The National Republican Congressional Committee is a national political committee that works to elect Republicans to the U.S. House. The New York Republican State Committee is a political party that works to promote Republican principles and to assist Republican candidates in obtaining election to partisan federal, state, and local office. Movants have interests—their own and those of their members—in the rules and procedures governing New York's elections, including New York's crucial June 28, 2022, primary elections, 2022 elections for the U.S. House, U.S. Senate, and Governor, among other offices. Movants have a direct interest in the implementation of a fair and orderly election process, conducted pursuant to New York law and the United States and New York Constitutions, and that this lawsuit is resolved in time for the aforesaid elections.

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ARGUMENT

I. Movants are entitled to intervene as of right.

Rule 24 is "liberally construed with all doubts resolved in favor of the proposed intervenor." *S.D. ex rel. Barnett v. U.S. Dep't of Interior*, 317 F.3d 783, 785 (8th Cir. 2003). Under Rule 24(a)(2), this Court must grant intervention as of right if four things are true: the motion is timely; movants have a legally protected interest in this action; this action may impair or impede that interest; and no existing

party adequately represents Movants' interests. *In re New York City Policing*, 2022 WL 627436, at *4 (2d Cir. Mar. 4). All four are true here.

A. The motion is timely.

This Court considers four factors in determining the timeliness of a motion to intervene: "(1) how long the applicant had notice of the interest before it made the motion to intervene; (2) prejudice to existing parties resulting from any delay; (3) prejudice to the applicant if the motion is denied; and (4) any unusual circumstances militating for or against a finding of timeliness." *Olin Corp. v. Lamorak Ins. Co.*, 325 F.R.D. 85, 87 (S.D.N.Y. 2018); *Floyd v. City of New York*, 770 F.3d 1051, 1058 (2d Cir. 2014). These factors all favor movants.

Movants have filed this motion early—before any named defendant filed any responsive pleading. Much later intervention motions have been declared timely. *See e.g.*, *Med. Diagnostic Imaging, PLLC v. CareCore Nat'l, LLC*, 542 F.Supp.2d 296, 301, 304 (S.D.N.Y. 2008) (allowing intervention over three months after party learned of the litigation); *Hartford Fire Ins. Co. v. Mitlof*, 193 F.R.D. 154, 160 (S.D.N.Y. 2000) (finding intervention timely when sought within three months of complaint); *North Dakota v. Heydinger*, 288 F.R.D. 423, 429 (D. Minn. 2012) (motion filed one year after answer); *Idaho Farm Bureau Fed'n v. Babbitt*, 58 F.3d 1392, 1397 (9th Cir. 1995) (motion filed four months after complaint); *Laroe Ests., Inc. v. Town of Chester*, 828 F.3d 60, 67 (2d Cir. 2016) (vacating denial of intervention several years into litigation, because "the parties have not even begun discovery" would not be prejudiced by delay), *vacated and remanded on other grounds*, 137 S. Ct. 1645 (2017).

Nor will Movants' intervention cause any delay that would prejudice the existing parties. This litigation has not yet begun in earnest. The State defendants have not yet filed responsive pleadings, and this Court has not decided any dispositive motions. Movants will comply with all deadlines that govern the parties, will work to prevent duplicative briefing, and will coordinate with the parties on discovery. Although intervention would mean that Plaintiff may face some additional arguments

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against its requested relief, "these arguments do not pertain to prejudice arising from the timeliness of this motion." *Am. Small Bus. League v. U.S. Dept. of Defense*, 2019 WL 2579200, at *3 (N.D. Cal. June 24, 2019); *see also Olin*, 325 F.R.D. at 88 (rejecting possibility of prejudice from claims movant seeks to litigate). Issues "concerning the nature and duration of the case"—as opposed to the effect of an untimely intervention—"do not constitute prejudice." *Defenders of Wildlife v. Johanns*, 2005 WL 3260986, at *4 (N.D. Cal. 2005). If Movants are not allowed to intervene, however, their interests could be irreparably harmed by an order overriding New York's election rules and undermining the integrity of New York's elections. Their motion is timely.

B. Movants have protected interests in this action.

Movants also have "'direct, substantial, legally protectible'" interests in the proceeding because they are Republican Party organizations that represent candidates and voters. *New York City Policing*, 2022 WL 627436, at *5. As the Fifth Circuit recently explained in a decision reversing the denial of the Republican Party's motion to intervene, "an interest is sufficient if it is of the type that the law deems worthy of protection, even if the intervenor does not have an enforceable legal entitlement or would not have standing to pursue her own claim." *La Union del Pueblo Entero v. Abbott*, 2022 WL 884493, at *2 (5th Cir. Mar. 25). Laws like those challenged here are designed to serve "the integrity of [the] election process," *Eu v. San Fran. Cty. Democratic Cent. Comm.*, 489 U.S. 214, 231 (1989), and the "orderly administration" of elections, *Crawford v. Marion Cty. Election Bd.*, 553 U.S. 181, 196 (2008) (op. of Stevens, J.). Movants have direct and significant interests in ensuring that the State maintains fair and reliable election procedures, which naturally affect Movants' "ability to participate in and maintain the integrity of the election process." *La Union*, 2022 WL 884493, at *3.

Indeed, federal courts "routinely" find that political parties have interests supporting intervention in litigation regarding election rules. *Issa*, 2020 WL 3074351, at *3; *see, e.g.*, *Siegel v. LePore*, 234 F.3d 1163, 1169 n.1 (11th Cir. 2001); *supra* n.*. Every election cycle, party organizations like

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Movants "expend significant resources" on the election process—"conduct" that laws like those at issue here "unquestionably regulate[]." *La Union*, 2022 WL 884493, at *3. Given their inherent and intense interest in elections, usually "[n]o one disputes" that political parties "meet the impaired interest requirement for intervention as of right." *Citizens United v. Gessler*, 2014 WL 4549001, *2 (D. Col. Sept. 15, 2014). That is certainly true where, as here, "changes in voting procedures could affect candidates running as Republicans and voters who [are] members of the … Republican Party." *Ohio Democratic Party v. Blackwell*, 2005 WL 8162665, *2 (S.D. Ohio Aug. 26, 2005); *see id.* (under such circumstances, "there [was] no dispute that the Ohio Republican Party had an interest in the subject matter of this case").

In short, because Movants' candidates will "actively seek [election or] reelection in contests governed by the challenged rules," and Movants' voters will vote in them, Movants have an interest in "demand[ing] adherence" to New York's rules. *Shays v. FEC*, 414 F.3d 76, 88 (D.C. Cir. 2005).

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C. This action threatens to impair Movants' interests.

Movants are "so situated that disposing of [this] action may as a practical matter impair or impede [their] ability to protect [their] interest." Fed. R. Civ. P. 24(a)(2). Movants "do not need to establish that their interests *will* be impaired," "only that the disposition of the action 'may' impair or impede their ability to protect their interests." *Brumfield v. Dodd*, 749 F.3d 339, 344 (5th Cir. 2014). This language from Rule 24 is "obviously designed to liberalize the right to intervene in federal actions." *Nuesse v. Camp*, 385 F.2d 694, 701 (D.C. Cir. 1967).

Here, Movants' interests will plainly "suffer if the Government were to lose this case, or to settle it against [Movants'] interests." *Mausolf v. Babbitt*, 85 F.3d 1295, 1302-03 (8th Cir. 1996). The outcome of this litigation could "change the entire election landscape for those participating as the Committees' members and volunteers" and "change what the [Movants] must do to prepare for

upcoming elections." *La Union*, 2022 WL 884493, at *4. That alone is enough to satisfy the impairment requirement. *Id.*

Not only would an adverse decision undercut democratically enacted laws that protect voters and candidates (including Movants' members), but it would also change the "structur[e] of th[e] competitive environment" and "fundamentally alter the environment in which [Movants] defend their concrete interests (e.g. their interest in … winning [election or] reelection)." *Shays*, 414 F.3d at 85-86; *see New York Policing*, 2022 WL 627436, at *6 (granting intervention based on movant's "interest that may be impaired by a decision that challenged conduct is unlawful"). These changes, especially if they occur near an election, also threaten to confuse voters and undermine confidence in the electoral process. *See Purcell v. Gonzalez*, 549 U.S. 1, 4-5 (2006). Movants will be forced to spend substantial resources fighting inevitable confusion and galvanizing participation in the wake of the "consequent incentive to remain away from the polls." *Id.*; *accord Pavek v. Simon*, 2020 WL 3183249, at *10 (D. Minn. June 15, 2020).

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The "very purpose of intervention is to allow interested parties to air their views so that a court may consider them before making potentially adverse decisions." *Brumfield*, 749 F.3d at 345. So the "best" course—and the one that Rule 24 "implements"—is to give "all parties with a real stake in a controversy … an opportunity to be heard" in this suit, *Hodgson v. United Mine Workers of Am.*, 473 F.2d 118, 130 (D.C. Cir. 1972). That includes Movants.

D. The existing parties do not adequately represent Movants' interests.

Finally, Movants are not adequately represented by the existing parties. Inadequacy is not a demanding showing. "This requirement 'is satisfied if the applicant shows that representation of his interest "may be" inadequate; and the burden of making that showing should be treated as minimal.'" *New York City Policing*, 2022 WL 627436, at *7; *see also Trbovich v. United Mine Workers of America*, 404 U.S. 528, 538 n.10 (1982). Movants need only raise "'sufficient doubt about the adequacy of

representation"' to justify intervention. *Id.* In other words, this requirement is fulfilled unless "the [State's] interests [are] so similar to those of [Movants] that adequacy of representation [is] assured." *Brennan v. N.Y.C. Bd. of Educ.*, 260 F.3d 123, 133 (2d Cir. 2001).

As then-Judge Garland explained, courts "often conclude[] that governmental entities do not adequately represent the interests of aspiring intervenors." *Fund for Animals, Inc. v. Norton*, 322 F.3d 728, 736 (D.C. Cir. 2003). "[T]he government's representation of the public interest generally cannot be assumed to be identical to the individual parochial interest of a [private movant] merely because both entities occupy the same posture in the litigation." *Utah Ass'n of Counties v. Clinton*, 255 F.3d 1246, 1255-56 (10th Cir. 2001). Here, too, Defendants necessarily represent "the public interest," rather than Movants' "particular interest[s]" in protecting their resources and the rights of their candidates and voters. *Coal. of Ariz./N.M. Counties for Stable Economic Growth v. DOI*, 100 F.3d 837, 845 (10th Cir. 1996). Movants' "private interests are different in kind from the public interests of the State or its officials," and "[n]either the State nor its officials can vindicate such an interest while acting in good faith." *La Union*, 2022 WL 884493, at *5. While all political parties want what's best for the country, the reality is that they have very different ideas of what that looks like and how best to accomplish it.

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This tension is stark in the context of elections. Defendants have no interest in the election of particular candidates or the mobilization of particular voters, or the costs associated with either. Instead, state officials, acting on behalf of all New York citizens and the State itself, must consider "a range of interests likely to diverge from those of the intervenors." *Meek v. Metro. Dade Cty.*, 985 F.2d 1471, 1478 (11th Cir. 1993). Those interests include:

- "the expense of defending the current [laws] out of [state] coffers," *Clark v. Putnam Cty.*, 168 F.3d 458, 461 (11th Cir. 1999);
- "the social and political divisiveness of the election issue," *Meek*, 985 F.2d at 1478;
- officials' "own desires to remain politically popular and effective leaders," *id.*;

- the State's interest in "'maintaining...its relationship with the federal government and with the courts' that routinely hear challenges to the State's elections laws," *La Union*, 2022 WL 884493, at *6; and
- even the interests of Plaintiff, *In re Sierra Club*, 945 F.2d 776, 779-80 (4th Cir. 1991).

The State "may have an interest in defending its ... practices" under its currently operative statutes, but it may also "have an equally strong or stronger interest in bringing such litigation to an end by settlement." *Brennan*, 260 F.3d at 133; *accord New York Policing*, 2022 WL 627436, at *7. Or it may "prefer to not resolve this case on the merits at all," such as by moving for dismissal "on sovereign-immunity and standing grounds." *La Union*, 2022 WL 884493, at *5. That too would prevent Defendants from adequately representing Movants' interests. *Id.* Given this range of possibilities, adequate representation of Movants' interests is far from "all but assured."

"Though we 'cannot say for sure that the state's more extensive interests will in fact result in inadequate representation,' we can say that 'surely they might, which is all that [Rule 24(a)(2)] requires.'" *Id.* at *6. That "satisfie[s] the minimal burden of showing inadequacy." *Id.* At the very least, Movants will "serve as a vigorous and helpful supplement" to Defendants and "can reasonably be expected to contribute to the informed resolutions of these questions." *NRDC v. Costle*, 561 F.2d 904, 912-13 (D.C. Cir. 1977). Movants affirmatively seek to preserve New York's voting safeguards, including the laws challenged here, and bring a wealth of knowledge and experience to the table. Movants thus should be granted intervention under Rule 24(a)(2).

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II. Alternatively, Movants are entitled to permissive intervention.

Even if Movants were not entitled to intervene as of right under Rule 24(a), this Court should grant them permissive intervention under Rule 24(b). Exercising broad judicial discretion, courts grant permissive intervention when the movant has a "claim or defense that shares with the main action a common question of law or fact." Fed. R. Civ. P. 249B); *see Olin*, 325 F.R.D. at 87. The "principal guide" is "whether the intervention will unduly delay or prejudice the adjudication of the original

parties' rights." *BNP Paribas v. Kurt Orban Partners LLC*, 2021 WL 355136, at *2 (S.D.N.Y. Feb. 2); Fed. R. Civ. P. 24(b)(3). The rule "is to be liberally construed." *Olin*, 325 F.R.D. at 87 (quoting *Degrafinreid v. Ricks*, 417 F.Supp.2d 403, 407 (S.D.N.Y. 2006)). "Unlike Rule 24(a), subsection (b) 'does not require a showing of inadequacy of representation.'" *Ariz. Democratic Party*, 2020 WL 6559160, at *1.

The requirements of Rule 24(b) are met here. As explained, Movants filed a timely motion. *Supra* I.A. And Movants will raise defenses that share many common questions with the parties' claims and defenses. Plaintiff alleges that the challenged laws are unconstitutional. Movants directly reject that allegation and assert that Plaintiff's desired relief would undermine the interests of Movants and their members. This obvious clash is why courts allow political parties to intervene in defense of state election laws. *See, e.g.*, *Swenson*, *supra*, at 4 ("[T]he [RNC and Republican Party of Wisconsin] have a defense that shares common questions of law and fact with the main action; namely, they seek to defend the challenged election laws to protect their and their members' stated interests—among other things, interest in the integrity of Wisconsin's elections."); *Priorities USA*, 2020 WL 2615504, at *5 (recognizing that the permissive-intervention factors were met when the RNC "demonstrate[d] that they seek to defend the constitutionality of Michigan's [election] laws, the same laws which the plaintiffs allege are unconstitutional"). In fact, as Plaintiff's "direct counterparts," Movants are "uniquely qualified to represent the [plaintiff's] 'mirror-image' interests." *DNC v. Bostelmann*, 2020 WL 1505640, at *5.

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Movants' intervention will not unduly delay this litigation or prejudice anyone. Movants swiftly moved to intervene at this case's earliest stage, and their participation will add no delay beyond the norm for multiparty litigation. Plaintiff puts the legality of New York's law at issue, after all, and it "can hardly be said to be prejudiced by having to prove a lawsuit [it] chose to initiate." *Security Ins. Co. of Hartford v. Schipporeit, Inc.*, 69 F.3d 1377, 1381 (7th Cir. 1995). Movants also commit to submitting

all filings in accordance with whatever briefing schedule the Court imposes, "which is a promise" that undermines claims of undue delay. *Emerson Hall Assocs., LP v. Travelers Casualty Ins. Co. of Am.*, 2016 WL 223794, *2 (W.D. Wis. Jan. 19, 2016).

Allowing Movants to intervene will promote consistency and fairness in the law, as well as efficiency in this case. It will allow "the Court … to profit from a diversity of viewpoints as [Movants] illuminate the ultimate questions posed by the parties." *Franconia Minerals (US) LLC v. United States*, 319 F.R.D. 261, 268 (D. Minn. 2017). Any prejudice from granting intervention would be no greater than the prejudice from denying intervention. *See Stringfellow v. Concerned Neighbors in Action*, 480 U.S. 370, 377 (1987) ("[W]hen an order prevents a putative intervenor from becoming a party in *any* respect, the order is subject to immediate review."); *Jacobson v. Detzner*, 2018 WL 10509488 (N.D. Fla. July 1, 2018) ("[D]enying [Republican Party organizations'] motion [to intervene] opens the door to delaying the adjudication of this case's merits for months—if not longer"). Where a court has doubts, "the most prudent and efficient course" is to allow permissive intervention. *Lac Courte Oreilles Band of Lake Superior Chippewa Indians of Wis. v. United States*, 2002 WL 32350046, *3 (W.D. Wis. Nov. 20, 2002).

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CONCLUSION

The Court should grant the motion and allow Movants to intervene as defendants.

Respectfully submitted,

Dated: March 31, 2022

s/ Paul DerOhannesian II

Tyler Green*
Cameron T. Norris*
James P. McGlone*
CONSOVOY MCCARTHY PARK PLLC
3033 Wilson Blvd., Ste. 700
Arlington, VA 22201
(703) 243-9423
tyler@consovoymccarthy.com
cam@consovoymccarthy.com
jim@consovoymccarthy.com
*pro hac vice forthcoming

Paul DerOhannesian II (PD0523)
DEROHANNESIAN & DEROHANNESIAN
159 Wolf Road, Suite 305
Albany, NY 12207
(518) 465-6420
Fax: (518) 427-0614
paul@derolaw.com

Counsel for RNC, NRCC, and NYGOP

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