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Clerk, U.S. District Court  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
HELENA DIVISION

MONTANA PUBLIC INTEREST  
RESEARCH GROUP; MONTANA  
FEDERATION OF PUBLIC  
EMPLOYEES,

Plaintiffs,

v.

CHRISTI JACOBSEN, in her official  
capacity as Montana Secretary of State;  
AUSTIN KNUDSEN, in his official  
capacity as Montana Attorney General;  
CHRIS GALLUS, in his official capacity  
as Montana Commissioner of Political  
Practices,

Defendants.

Case No. CV 23-70-H-BMM-KLD

**RESTORING INTEGRITY AND  
TRUST IN ELECTIONS'  
UNOPPOSED MOTION FOR  
LEAVE TO FILE AMICUS BRIEF  
OPPOSING PLAINTIFFS'  
MOTION FOR A PRELIMINARY  
INJUNCTION**

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## CORPORATE DISCLOSURE STATEMENT

Restoring Integrity and Trust in Elections, Inc. (RITE), is a 501(c)(4) non-profit organization. It has no parent corporation and no publicly held corporation holds a 10% or greater ownership interest in it.

### MOTION

“American elections set the course of our great nation.” *Our Mission*, Restoring Integrity and Trust in Elections. <https://riteusa.org/our-mission/> (as last visited Nov. 1, 2023). “Electoral systems must be designed, safeguarded, and implemented in a manner that reflects the will of our citizens so that electoral results enjoy the public’s full faith and confidence.” *Id.* RITE exists to defend democratically enacted election-integrity laws in litigation. *Id.*

This case falls squarely within RITE’s mission. The Plaintiffs challenge HB 892, which prohibits individuals registered to vote in Montana from “purposefully remain[ing] registered to vote in more than one place in” Montana “or another state ....” 2023 Montana Laws Ch. 742 (H.B. 892) (amending Mont. Code. Ann. §13-35-210(4)). The law thus requires Montana voters to sever political ties with other States. And it requires those who register in another State to sever their political ties with Montana. These requirements serve important purposes. First, they ensure that only individuals fully committed to Montana’s political community wield a share of its sovereign authority by voting in its elections. Second, because duplicative

registrations create opportunities for fraud and impair the smooth administration of elections, eliminating such registrations promotes public confidence in elections.

RITE's brief elaborates on these points, situating the statute within the broader constitutional and election-law framework—matters the parties will not likely have the luxury of having space to address. The *amicus* brief will also address *Common Cause Indiana v. Lawson*, 937 F.3d 944 (7th Cir. 2019), which the plaintiffs' brief cites. The *amicus* brief will discuss this decision in detail, helping to show that the case is neither relevant to any issue in this case nor persuasive on its own terms. This discussion will aid the Court, because the defendants face too many issues to dedicate substantial space on this one case.

RITE's counsel contacted counsel for the parties. Counsel for Plaintiffs and Defendants reported that no party opposes this motion.

DATED this 17th day of November, 2023



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## CERTIFICATE OF SERVICE

I certify that, on this 17th day of November, 2023, a copy of the foregoing document was served on the following persons by U.S. Certified Mail, addressed as follows:

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