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*Attorneys for Plaintiffs*

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
HELENA DIVISION

MONTANA PUBLIC INTEREST  
RESEARCH GROUP et al.,

Plaintiffs,

vs.

CHRISTI JACOBSEN, in her  
official capacity as Montana  
Secretary of State, et al.,

Defendants,

and

REPUBLICAN NATIONAL  
COMMITTEE et al.,

Defendant-  
Intervenors.

CV 23-70-H-BMM-KLD

STATEMENT OF STIPULATED FACTS

Pursuant to the Court's scheduling orders, *see* ECF Nos. 4, 56, and L.R. 16.2(b)(3), the parties met and conferred and Plaintiffs hereby submit the following statement of stipulated facts:

**I. House Bill 892**

1. Montana law prohibited double voting prior to the enactment of House Bill 892 ("HB892"). *See* Mont. Code Ann. § 13-35-210(1) (2021) ("No person may vote more than once at an election.").

2. HB892 amended section 13-35-210 of the Montana Code to state: "A person or elector may not purposefully remain registered to vote in more than one place in this state or another state any time, unless related to involvement in special district elections. A person or elector previously registered to vote in another county or another state shall provide the previous registration information on the Montana voter registration application provided for in 13-2-110." *Id.* § 13-35-210(5) (2023).

3. HB892 further amended section 13-35-210 of the Montana Code to state: "A person who violates this section shall, on conviction, be fined up to \$5,000, be imprisoned for up to 18 months, or both." *Id.* § 13-35-210(6).

4. HB892's legislative sponsor, Rep. Lyn Hellegaard, stated to the House State Administration Committee that the purpose of HB892 was to "clarify what double voting means in Montana law and that voting in Montana and another state is defined as the same election."

5. HB892 was signed into law on May 22, 2023.

## II. Parties

6. Plaintiff Montana Public Interest Group (“MontPIRG”) is a student-led organization that focuses on, among other issues, registering young voters.

7. Plaintiff Montana Federation of Public Employees (“MFPE”) is Montana’s largest union, representing tens of thousands of working Montanans.

8. MFPE is politically active and encourages its members to register and vote.

9. Defendant Christi Jacobsen is the Montana Secretary of State.

10. Defendant Austin Knudsen is the Montana Attorney General.

11. Defendant Chris Gallus is the Montana Commissioner of Political Practices.

12. Defendant-Intervenor the Republican National Committee (“RNC”) is a national committee as defined by 52 U.S.C. § 30101.

13. The RNC manages the Republican Party’s business at the national level, supports Republican candidates, and coordinates fundraising and election strategy throughout the United States.

14. Defendant-Intervenor the Montana Republican Party is a recognized political party in Montana that works to promote Republican values and assist Republican candidates in federal, state, and local races.

Dated: March 18, 2024

Respectfully submitted,

By: /s/ Raph Graybill  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 18<sup>th</sup> day of March, 2024, a copy of the foregoing document was served on the following persons by the following means:

1, 2, 3 CM/ECF  
           Hand Delivery  
           Mail  
           Overnight Delivery Service  
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