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*Id.*

Chief Justice Chase also mistakenly relied on Section 5, which authorizes congressional legislation. *Id.* But *authorizing* Congress to enact legislation does not *deprive* states of their inherent authority and obligation to enforce the U.S. Constitution. *See supra* Part V.A. Chase stated that the exclusive role for Congress in removing disqualifications “gives to [C]ongress absolute control over the whole operation of the amendment.” *Griffin’s Case*, 11 F. Cas. at 26. But that does not follow. Rather, Section 3’s grant of exclusive authority to Congress to *remove* the disqualification, coupled with the absence of such language regarding the *disqualification itself*, reinforces that Section 3’s disqualification requirement, may (and must) be enforced by state courts with or without congressional action. *See Anderson*, 2023 CO 63, at ¶ 104.

## VI. CONCLUSION

In sum, Petitioners’ Objection is fully supported by both the applicable legal standards and properly pled facts. For that reason, Candidate Trump’s Motion to Dismiss Objectors’ Petition should be denied.

Respectfully submitted,

By: /s/ Caryn C. Lederer  
One of the Attorneys for Petitioners-Objectors

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**BEFORE THE STATE BOARD OF ELECTIONS SITTING AS THE STATE OFFICERS  
ELECTORAL BOARD FOR THE HEARING AND PASSING UPON OF OBJECTIONS  
TO THE CERTIFICATES OF NOMINATION AND NOMINATION PAPERS OF  
CANDIDATES FOR THE REPUBLICAN NOMINATION FOR THE OFFICE OF  
PRESIDENT OF THE UNITED STATES TO BE VOTED UPON AT THE MARCH 19,  
2024 GENERAL PRIMARY ELECTION**

**Steven Daniel Anderson; Charles J. Holley;  
Jack L. Hickman; Ralph E. Cintron;  
Darryl P. Baker,**

Petitioners-Objectors,

v.

Case No. 24 SOEB GP 517

**Donald J. Trump,**

Respondent-Candidate.

**PROOF OF SERVICE**

Counsel for Objectors hereby certifies that Objectors' Response in Opposition to Trump's Motion to Dismiss was filed with the State Officers Electoral Board via email at [generalcounsel@elections.il.gov](mailto:generalcounsel@elections.il.gov) and Hearing Officer Judge Clark Erickson via email at [ceead48@icloud.com](mailto:ceead48@icloud.com), and served on Candidate Trump via his counsel at [AMerrill@watershed-law.com](mailto:AMerrill@watershed-law.com), before 5:00 p.m. on January 23, 2024.

/s/ Caryn C. Lederer  
Caryn C. Lederer