

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

RICHARD VON GLAHN, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 26AC-CC00248
)	
CATHERINE HANAWAY, <i>et al.</i> ,)	
)	
Respondents.)	

**VERIFIED MOTION TO INTERVENE OF PUT MISSOURI FIRST
AND THE REPUBLICAN NATIONAL COMMITTEE**

Put Missouri First, a Missouri political action committee, and the Republican National Committee, respectfully move this Court for leave to intervene as Intervenors in the above-captioned action, pursuant to Missouri Rule of Civil Procedure 52.12. In support of this Motion, Movants state as follows:

I. Parties

1. Intervenor, Put Missouri First, is a political action committee, organized under Chapter 130, RSMo, and Article VIII, Section 23 of the Missouri Constitution. Put Missouri First has filed its Statement of Organization with the Missouri Ethics Commission, which is attached as Exhibit A hereto.

2. Intervenor Put Missouri First engages in (1) raising and expending funds to support or oppose ballot measures through independent expenditures and coordinated campaign efforts; (2) developing and disseminating public messaging and advertising to inform voters of the legal, fiscal, and policy implications of proposed initiatives; (3) forming and participating in coalitions with allied organizations, trade associations, and community stakeholders to

coordinate opposition efforts; (4) engaging in legal and regulatory advocacy, including monitoring the initiative process, challenging ballot titles and summaries, and ensuring compliance with campaign-finance and election laws; (5) conducting voter education and outreach programs to provide analytical information regarding ballot propositions; and (6) strategically organizing campaign activities and communications to ensure timely and effective opposition to initiatives that may adversely affect the public interest or existing law.

3. Intervenor Put Missouri First has intervened in the prior case filed by the Plaintiffs in this case, *People Not Politicians and Richard Von Glahn v. Missouri Secretary of State*, No. 25AC-CC07128, and continues to actively participate in that case.

4. Intervenor Put Missouri First has also intervened in *Maggard v. State of Missouri*, No. SC101581 (appeal from Judge Stumpe in case number 25AC-CC09120), which contains the same issues raised in this case.

5. In this litigation, Intervenor Put Missouri First are supporters of the congressional map lawfully passed by HB1 and currently in effect, and they oppose the unprecedented relief sought by Plaintiffs.

6. Intervenor Republican National Committee (“RNC”) is a national committee as defined by 52 U.S.C. § 30101. It manages the Republican Party’s business at the national level, supports Republican candidates for public office at all levels and all states—including in Missouri, coordinates fundraising and election strategy, and develops and promotes the national Republican platform. The RNC’s membership consists of the party chair and a national committeeman and national committeewoman from each State and territory, including multiple representatives from Missouri who are registered voters in Missouri.

7. The RNC regularly encourages registered Republicans to vote in Missouri. The RNC thus has an interest in ensuring that Missouri elections are conducted in a safe and secure manner and in accordance with law. Missouri will have a Republican on the 2026 midterm election ballots for each of Missouri's Congressional seats. In addition, Missouri will hold an auditor's election in November 2026, and half of the state senate seats and all state representative seats will be up for election with a Republican candidate running in nearly all of those races.

8. The RNC has a substantial interest in the implementation of HB1 and the outcome of this litigation, as the congressional districts established by HB1 directly affect the RNC's ability to support and elect Republican candidates in Missouri to the United States House of Representatives. The RNC opposes the unprecedented relief sought by Plaintiffs, which would disrupt the lawfully enacted congressional map and interfere with the electoral process.

II. Background

9. During an Extraordinary Session held from September 3 to September 12, 2025, the General Assembly passed House Bill 1 ("HB1").

10. Between September 12, 2025, and September 27, 2025, Plaintiff Von Glahn sent three referendum petition sample sheets to the Secretary of State for approval to circulate, denominated as 2026-R001 through 2026-R003.

11. Between September 13, 2025, and September 18, 2025, Plaintiff Von Glahn set about the process of collecting signatures on the referendum petitions whose sample sheets were pending approval by the Secretary of State.

12. On September 26, 2025, Secretary Hoskins rejected the submitted referendum sample sheets "as to form" because HB1 had not yet been signed

by the Governor.

13. On September 28, 2025, Governor Mike Kehoe signed HB1 into law.

14. On September 29, 2025, Plaintiff Von Glahn filed his fourth and final referendum petition sample sheet to the Secretary of State for approval, which was granted.

15. On December 9, 2025, Plaintiff Von Glahn filed signature pages for his referendum petition with the Secretary of State.

16. A determination of the sufficiency of that referendum petition has not yet occurred.

A. *Von Glahn I*

17. On September 18, 2025, Plaintiff Von Glahn, joined by Plaintiff People not Politicians, filed suit against Secretary of State Denny Hoskins, challenging Secretary Hoskins' alleged intent to reject the initial sample sheets.

18. That challenge brought by Plaintiff Von Glahn and Plaintiff People not Politicians is currently being held in abeyance pending the Secretary of State's sufficiency check. See *Von Glahn v. Hoskins*, No. 25AC-CC07128 ("*Von Glahn I*").

19. On November 11, 2025, Defendant Secretary Hoskins, represented by Attorney General Catherine Hanaway, filed a Motion to Dismiss *Von Glahn I*, arguing that the challenge was moot, unripe, and failed to state a claim.

20. On November 12, 2025, Put Missouri First intervened in *Von Glahn I*.

21. On November 24, 2025, Secretary Hoskins renewed his Motion to Dismiss or, in the alternative, requested a Judgment on the Pleadings.

22. On November 25, 2025, Intervenor Put Missouri first filed a

Motion to Dismiss *Von Glahn I*, on the grounds that Plaintiffs lacked standing, presented a question which was unripe for adjudication, improperly used Declaratory Judgment as a vehicle to bring suit, and presented a moot point.

23. On December 4, 2025, Plaintiffs filed a Motion in Opposition to the Motion to Dismiss. Plaintiffs' motion claimed that the complaint presented a ripe controversy because the Secretary had expressed his intent to reject signatures gathered before approval of the sample sheet during his sufficiency check.

24. On December 8, 2025, the Honorable Chris Limbaugh entered an order holding the case in abeyance pending the Secretary of State's sufficiency check.

25. The court stated that abeyance was necessary because the issues presented in *Von Glahn I* could be mooted by the outcome of the sufficiency check.

26. On March 6, 2026, Plaintiffs in *Von Glahn I*, filed a Motion to End the Abeyance.

27. The court denied the Motion, and the case remained in abeyance.

28. On April 1, 2026, Plaintiffs filed a writ against the Honorable Chris Limbaugh, claiming that the abeyance was an abuse of discretion and seeking a writ of prohibition to end it. *See State of Missouri ex rel. People Not Politicians v. Hon. Christopher K. Limbaugh*, No. WD88821.

29. On April 7, 2026, the Writ was denied.

B. Maggard

30. On December 23, 2025, Jake Maggard and Gregg Lombardi filed an action against the State of Missouri and Secretary of State Denny Hoskins. *See Maggard v. State of Missouri*, No. 25AC-CC09120 ("*Maggard*").

31. On January 8, 2026, Put Missouri First was granted intervention

in *Maggard*.

32. The plaintiffs in *Maggard* asserted that HB1 was suspended upon the filing of the signature pages with the Secretary of State on December 9, 2025.

33. The plaintiffs in *Maggard* also sought injunctive relief to enjoin any person from using HB1's congressional maps unless and until the referendum was approved by voters.

34. After a trial on February 10, 2026, Judge Stumpe entered Final Judgment in favor of Defendants and Intervenor Put Missouri First.

35. Plaintiffs in *Maggard* appealed to the Missouri Supreme Court.

36. Plaintiff in this case, People Not Politicians, filed an amicus brief in the Supreme Court in support of the *Maggard* Plaintiffs.

37. Intervenor Put Missouri First participated in all stages of the *Maggard* case, including oral arguments before the Missouri Supreme Court.

38. On May 12, 2026, the Supreme Court issued its opinion in *Maggard*. The Court affirmed Judge Stumpe and held that HB1 was not suspended until the Secretary of State completed his sufficiency check:

The circuit court correctly concluded the December 9 referendum petition filing did not automatically suspend HB 1 under article III, sections 49, 52(a), or 52(b) of the Missouri Constitution. This Court affirms the circuit court's judgment.

Maggard v. State, No. SC 101581, 2026 WL 1361506, at *8 (Mo. May 12, 2026)

C. The Current Action

39. On May 18, 2026, just six days after the Supreme Court's decision in *Maggard*, the same Plaintiffs in *Von Glahn I* filed the present action naming as Respondents Secretary Hoskins and Attorney General Catherine Hanaway.

40. Plaintiffs here seek the same relief they seek in *Von Glahn I* (requiring the Secretary to certify the referendum) and the same relief that was sought and denied by the Supreme Court in *Maggard* (that HB1 is

suspended and not in effect).

III. Intervention as of Right under Rule 52.12

41. Intervention generally should “be allowed with considerable liberality.” *Johnson v. State*, 366 S.W.3d 11, 20 (Mo. banc 2012) (internal citation omitted).

42. “The proposed intervenor carries the burden of establishing the presence of all three elements required for intervention as a matter of right. When an applicant satisfies these elements, however, the right to intervene is absolute and the motion to intervene may not be denied.” *State ex rel. Nixon v. American Tobacco Co.*, 34 S.W.3d 122, 127 (Mo. banc 2000) (internal citations omitted).

43. The elements of intervention as a matter of right under 52.12(a)(2), are: “(1) an interest relating to the property or transaction which is the subject of the action; (2) that the applicant’s ability to protect the interest is impaired or impeded; and (3) that the existing parties are inadequately representing the applicant’s interest.” *Id.* (internal citations omitted).

44. “The Rule ‘should be liberally construed to permit broad intervention’” and “even the requirement of a pleading may be excused.” *Allred v. Carnahan*, 372 S.W.3d 477, 482 (Mo.App. W.D. 2012) (quoting *State ex rel. St. Joseph, Mo. Ass’n of Plumbing, Heating and Cooling Contractors, Inc. v. City of St. Joseph*, 579 S.W.2d 804, 806 (Mo. App. W.D.1979)).

45. “An interest, for purposes of intervention as of right, means a concern, more than mere curiosity, or academic or sentimental desire. An interest necessary for intervention as a matter of right does not include a mere, consequential, remote or conjectural possibility of being affected as a result of the action but must be a direct claim upon the subject matter such that the intervenor will either gain or lose by direct operation of judgment.” *Allred v.*

Carnahan, 372 S.W.3d 477, 484-85 (Mo. App. W.D. 2012) (internal citations omitted).

46. By filing ten (10) days and only seven (7) business days after this action began, Intervenors have timely filed their Motion to Intervene. *Robinson v. Mo. Dep't of Health & Senior Servs.*, 672 S.W.3d 224, 233 (Mo. banc 2023) (timeliness for a Motion to Intervene considers “how far the litigation has progressed when intervention is sought, the reason for the delay, and prejudice that other parties will suffer as a result of additional delay”) (quoting *McClain v. Wagner Elec. Corp.*, 550 F.2d 1115, 1120 (8th Cir. 1977)).

A. Intervenors’ Interest Directly Relates to the Subject of the Action

47. Intervenors have a substantial interest in the subject of this case sufficient to warrant intervention as of right. As the Missouri Supreme Court stated:

‘Interest’ generally means a concern which is more than a mere curiosity, or academic or sentimental desire. One interested in the action is one who is interested in the outcome and result thereof because he has a legal right which will be directly affected thereby or legal liability which will be directly and largely diminished by the judgment or decree in such action.

In the Matter of Trapp, 593 S.W.2d 193, 204 (Mo. banc 1980).

48. Intervenor Put Missouri First is a registered political action committee with the purpose of supporting the HB1 map.

49. Intervenor Put Missouri First’s formation, reporting obligations, and expenditures are governed by Missouri’s campaign-finance statutes, which directly tie its activities to the validity and enforceability of HB1 and to the life cycle of the resolution in this case.

50. Further, the Secretary of State’s determination that the petition is

insufficient directly governs whether Intervenors must initiate statewide campaign operations, undertake additional reporting obligations, and deploy financial and organizational resources in opposition to the measure.

51. The RNC has an interest in spending resources effectively to achieve its mission.

52. 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*, No. 14-cv-2266, 2014 WL 4549001, *2 (D. Col. 2014) (unpublished opinion).

53. Both the Democratic and Republican Parties have successfully intervened in numerous election cases. See, e.g., *La Union del Pueblo Entero v. Abbott*, 29 F.4th 299, 306 (5th Cir. 2022); *Bost v. Ill. State Bd. of Elections*, 75 F.4th 682, 687 (7th Cir. 2023); *Mi Familia Vota v. Hobbs*, No. 2:21-cv-1423, 2021 WL 5217875 (D. Ariz. 2021) (unpublished opinion).

54. The RNC has a “direct and substantial interest” in this case because the outcome will “affect” its “ability to participate in and maintain the integrity of the election process” in Missouri. *La Union del Pueblo*, 29 F.4th at 306. Further, voter confidence has “independent significance,” *Crawford*, 553 U.S. at 197, because it “is essential to the functioning of our participatory democracy,” *Purcell v. Gonzalez*, 549 U.S. 1, 4, 127 S. Ct. 5, 166 L.Ed.2d 1 (2006). Voter confidence has a direct effect on voter turnout, *see id.*, which is key to the RNC’s mission to elect Republican candidates.

55. Intervenors’ interests are not abstract or ideological, but immediate and concrete.

56. Further, Intervenors have already invested resources to defend the HB1 map through litigation and by educating voters, coordinating coalition opposition, and communicating the legal and policy defects of the proposal.

57. Intervenors, to date, have raised and expended dollars in support of the HB1 map and intend to continue their actions going forward.

58. Intervenors' fundraising, communications, and expenditure decisions are heavily impacted by the validity or potential lack thereof of HB1.

59. Furthermore, Intervenor Put Missouri First was a party in *Maggard* and is currently a party in *Von Glahn I*. Intervenor Put Missouri First has expended time, funds, and efforts to uphold and implement HB1 in those cases, and judges in each case have concurred that Intervenor Put Missouri First has an interest that directly relates to the subject of the current action.

60. Accordingly, Intervenors have "a direct claim upon the subject matter such that the intervenor will either gain or lose by direct operation of judgment." *State ex rel. Nixon v. Am. Tobacco Co.*, 34 S.W.3d 122, 128 (Mo. 2000).

B. Intervenors' Ability to Protect Their Interests Will be Practically Impaired as a Direct Result of this Litigation

61. If this Court were to declare that Secretary Hoskins has already made a determination on the sufficiency of the referendum, or to order him to immediately issue a certificate in accordance with that determination, Intervenors would be required to immediately alter their campaign, legal, and organizational strategies in response to a judicially imposed change in the statutory referendum timelines.

62. Such an order would require significant and unavoidable expenditures of time, money, personnel, and strategic focus. Intervenors would be required to reassess the referendum's legal posture, prepare for immediate judicial review of any certificate issued, coordinate with counsel regarding the effect of accelerated certification, revise voter-facing communications, adjust

fundraising timelines, and determine whether expanded campaign operations must begin immediately rather than after completion of the ordinary statutory process.

63. Further, if this Court were to restrain Respondents from taking any further steps to implement the HB1 map, or mandate the usage of the old map, until a certificate were issued, Intervenors would be required to immediately deploy substantial financial, legal, and organizational resources in an attempt to protect HB1's implementation during the ensuing delay.

64. Such a restraint would impose significant and unavoidable expenditures because Intervenors would be required to respond to a judicially created interruption in HB1's implementation. Intervenors would need to revise public messaging concerning whether HB1 remains operative, coordinate voter education regarding the effect of the order, expend funds on media and outreach to prevent confusion concerning the governing congressional map, coordinate with allied organizations and stakeholders affected by the delay, and devote additional legal resources to monitoring and responding to the continued litigation over HB1's sufficiency and alleged suspension.

65. Furthermore, the relief sought by Plaintiffs would negate the opinion of the Supreme Court in *Maggard*, in which Put Missouri First was a party and an active participant at all levels. The relief sought by Plaintiffs in this case would also harm Intervenors' interests in *Von Glahn I*.

66. Therefore, the outcome of this litigation directly determines the extent, timing, and urgency of Intervenors' legal, financial, and operational obligations.

67. A judicial determination that HB1's map may not be implemented or mandated would materially diminish the value of Intervenors' past

expenditures and undermine the efficacy of Intervenors' advocacy efforts in support of HB1.

C. The Existing Parties are Inadequate to Protect Intervenors' Interests

68. “[O]nce a proposed intervenor establishes an interest in the underlying litigation and that such an interest may be impaired or impeded if intervention is not permitted, the third element is satisfied upon a ‘minimal showing’ that there is a divergence of interest between the proposed intervenor and the party.” *Allred*, 372 S.W.3d at 486.

a. The State's Institutional Role Differs Fundamentally from Intervenors' Advocacy Interests.

69. The Secretary of State and Attorney General are defending the validity of the State's administrative action through their institutional obligation to represent the interests of the Respondents in their official capacities as elected officials, not the interests of private citizens or organizations that support the passage and implementation of the HB1 map.

70. The State's interest is limited to ensuring that its procedures were lawful, that its officials acted within their statutory authority, and that the integrity of the election process is maintained.

71. Plaintiffs' interest is in striking down HB1 and, in the alternative, withholding the effects of it from impacting this year's election cycle.

72. By contrast, Intervenors' interests are operational and mission-specific: to support and see the implementation of HB1 while simultaneously opposing and preventing the referendum from adversely affecting the policy and regulatory landscape.

73. Intervenors' position stems not merely from procedural concerns, but from substantive policy consequences of enjoining the HB1 map and

speeding up the statutory deadlines.

74. Neither Plaintiffs nor the Respondents share or represent those substantive objectives of Intervenors.

75. Therefore, there is “a divergence of interest between the proposed intervenor and the party” sufficient to show inadequate representation may exist. *Merch. v. Grand Lodge of Ancient Free & Accepted Masons*, 685 S.W.3d 455, 464 (Mo. App. W.D. 2024), reh’g and/or transfer denied (Jan. 30, 2024), transfer denied (Apr. 2, 2024).

b. The State’s Defense Is Limited to Procedural Integrity, Not the Broader Policy Impact of the Outcome.

76. In this action, the State’s primary objective is to demonstrate that the Secretary’s review of the referendum petition has and continues to comply with administrative, statutory, and constitutional requirements.

77. Further, that the Attorney General’s actions have and continue to comply with statutory and constitutional requirements.

78. Similarly, Plaintiffs’ primary objective is to defeat HB1 and prevent its map from going into effect either by receiving a sufficiency certificate or using this Court to force a future judicial review.

79. Intervenors, by contrast, have a direct and practical interest in ensuring that HB1’s map appears on the ballot to vindicate the time, money, and resources they have and intend to continue to spend.

80. Accordingly, Intervenors’ interests cannot be properly represented by Respondents because, unlike the State, suspension of HB1’s map would undermine policies that Intervenors, their contributors, and affiliated organizations seek to preserve. That difference matters. The State may choose not to raise arguments concerning the substantive harms caused by the suspension of HB1, the costs of changing the map on the reversal of the

interested parties, or the broader election implications—all of which are central to the Intervenor’s missions.

81. Plaintiffs, on the other hand, seek to invalidate the entire implementation of HB1 and seek an improvidently accelerated certificate so that they may skip forward to judicial review and advance their interests in other litigations. This would cause direct and immediate harm to Intervenor’s aforementioned purposes and interests as opponents of Plaintiffs in other litigations.

82. Because the Plaintiffs’ claims and Respondents’ defenses do not encompass those substantive dimensions, their representation cannot be deemed adequate under Rule 52.12(a)(2). *Ainsworth v. Old Sec. Life Ins. Co.*, 694 S.W.2d 838, 841 (Mo.App. W.D. 1985) (holding inadequate representation exists where a party may come short of an Intervenor’s single-minded purpose in litigation).

c. Existing Parties’ Goals and Obligations Will Lead to Strategic or Policy Divergences.

83. Respondents must balance competing interests, including neutrality toward proponents and adherence to statutory duties.

84. It cannot, for instance, engage in advocacy that is partisan or policy-driven.

85. Intervenor’s are under no such constraint.

86. Intervenor’s only goals are to support implementation of the HB1 map and to ensure the State continues with said implementation.

87. Conversely, Plaintiffs seek the complete halting of HB1’s map implementation and a reversion to the old map.

88. As such, Intervenor’s will assert positions, marshal evidence, and pursue arguments that Plaintiffs and Respondents will not advance.

89. Furthermore, if the litigation proceeds to appeal or settlement discussions, the State might elect to narrow its defense, stipulate to certain facts, or refrain from further review for institutional reasons unrelated to, and potentially counter to, Intervenors' objectives.

90. The State may agree to a consent order or settlement that accelerates the certification timeline without regard to the impact on Intervenors' campaign operations and expenditures.

91. The Attorney General, representing both Secretary Hoskins and the State, may have conflicting institutional interests between defending the sufficiency process and any broader executive priorities, which could lead to a narrowed defense.

92. Finally, the State has no financial stake in Intervenors' past or future expenditures; only Intervenors can represent and defend that concrete financial interest.

93. Because a different approach to the conduct of litigation is present between the State and Intervenors, the State cannot adequately protect Intervenors' interests. *Trbovich v. United Mine Workers of Am.*, 404 U.S. 528, 539, 92 S. Ct. 630, 637, 30 L. Ed. 2d 686 (1972) (holding inadequate representation existed when a differing approach to litigation between a party and Intervenor exists).

94. Similarly, Plaintiffs will make decisions that will be adverse and in opposition to the interests and litigation decisions of Intervenors.

III. Permissive Intervention Should be Granted.

95. In the alternative, and without waiving any of the arguments regarding Intervention as of Right, Intervenors should be granted permissive intervention pursuant to Rule 52.12(b), which authorizes the Court to allow intervention where, as here, proposed intervenors filed a timely motion and

their claims and/or defenses have a question of law or fact in common with the existing litigation.

96. By filing ten (10) days and only seven (7) business days after the filing of this action, Intervenors have timely filed their Motion to Intervene. *Robinson v. Mo. Dep't of Health & Senior Servs.*, 672 S.W.3d 224, 233 (Mo. banc 2023) (timeliness for a Motion to Intervene considers “how far the litigation has progressed when intervention is sought, the reason for the delay, and prejudice that other parties will suffer as a result of additional delay”) (quoting *McClain v. Wagner Elec. Corp.*, 550 F.2d 1115, 1120 (8th Cir. 1977)).

97. As discussed *supra*, Intervenors' defenses have questions of fact and law in common with this case. This Verified Motion contains dozens of factual statements related to the questions of law and fact in common with this case. Intervenors have dedicated and will continue to dedicate resources to support the implementation of the HB1 map, which is the underlying matter in this case. The result of this case will thus directly impact Intervenors and will impose additional expenses and reporting requirements on Intervenors if Plaintiffs or Respondents prevail.

98. This Court has broad discretion to grant permissive intervention where the claim or defense and the main action have a question of law or fact in common.

99. For these reasons, this Court should grant permissive intervention if it does not grant intervention as a matter of right.

100. No hearings have been conducted in the docket thus far.

101. The intervention will not delay or impede adjudication of this case.

102. Accordingly, Intervenors seek to intervene in accordance with Missouri Supreme Court Rule 52.12(a) and (b)(2).

103. Respondents do not object to Intervention. Plaintiffs have not

consented to Intervention.

104. In accordance with Supreme Court Rule 52.12 (c), Intervenors have attached their responsive pleadings, consisting of Answers, hereto as Exhibit 1.

WHEREFORE, Movants Put Missouri First and the Republican National Committee respectfully request this Court grant their Motion to Intervene and for such other relief as this Court deems appropriate.

Respectfully submitted,

ELLINGER BELL LLC

By: /s/ Marc H. Ellinger

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Committee

CERTIFICATE OF SERVICE

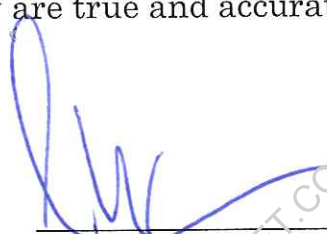
I hereby certify that a true and accurate copy of the foregoing was served via the Court's electronic filing system on May 28, 2026 on all parties of record.

/s/ Marc H. Ellinger

VERIFICATION

State of Missouri)
) ss
County of St. Louis)

I, Matt Belz, Treasurer of Put Missouri First, hereby appear under oath and verify that I have personal knowledge of the facts in the above Verified Motion to Intervene and that they are true and accurate to my best knowledge and belief.



Matt Belz

Subscribed and sworn to before me, the undersigned, a Notary Public in and for the county and state aforesaid, on this 26th day of May 2026.



Notary Public

My Commission Expires:

JENESA MAGGART
Notary Public - Notary Seal
State of Missouri
Commissioned for St. Louis County
My Commission Expires: June 16, 2027
Commission Number: 15413314

VERIFICATION

State of District of Columbia

County of N/A) ss

I, Michael J. Ambrosini, Chief of Staff of the RNC, hereby appear under oath verify that I have personal knowledge of the facts in the above Verified Motion to Intervene and that they are true and accurate.

Michael J. Ambrosini

Michael J. Ambrosini

Subscribed and sworn to before me, the undersigned, a Notary Public in and for the county and state aforesaid, on this 28 day of May 2026.

Elizabeth Pretuman

Notary Public

My Commission Expires:

DISTRICT OF COLUMBIA

Signed and sworn to (or affirmed) before me on

5/28/26 by Elizabeth Pretuman

Date

Name of

Elizabeth Pretuman

Signature of Notarial Officer

Notary Public

My commission expires: 11/14/30

