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SECRETARY OF STATE

The Honorable Paul D. Pate
Secretary of State
First Floor, Lucas Building
321 E. 12th St.
Des Moines, IA 50319

Dear Secretary Pate:

I write to object to Ginny Caligiuri's nomination petitions for U.S. Representative in Iowa's 2nd Congressional District.

Pursuant to *Iowa Code* § 43.20, nomination petitions for U.S. Representative in Iowa's 2nd Congressional District must be signed by as few as 2 percent of the total vote for the party's candidate for President, in a minimum of 12 separate counties of the district they aim to represent, as shown by the last election. Mrs. Caligiuri's petitions, as filed, reached that threshold in exactly 12 counties. One of these 12 counties in which Mrs. Caligiuri attempted to reach the minimum threshold was Washington County, for which a minimum of **124 signatures** are required.¹ Mrs. Caligiuri submitted **133 signatures** as counted by the Iowa Secretary of State's Office. Of the 133 signatures filed in Washington County, **at least 14** are invalid, and therefore must be disqualified. Of the invalid signatures, nine are duplicates or triplicates, and five are from addresses outside of Washington County.

Once these 14 signatures are disqualified, Mrs. Caligiuri will have **119 signatures, putting her below the minimum threshold for Washington County**. This, in turn, will put her under the minimum threshold of 12 counties reached in the 2nd Congressional District. Therefore, her petitions do not meet the required minimum standard prescribed by *Iowa Code* § 43.20 and must be rejected.

Below is a detailed description of **14 known** invalid signatures, and why they must be disqualified. Following the description, please find an exhibit that serves as proof of disqualification.

Duplicate Signatures from Washington County:

Note: All signatures from Washington County, including duplicate signatures, are located in Exhibit A. The first occurrence of a signature is highlighted in yellow, the duplicate or triplicate signature is highlighted in pink.

1. On page 11, line 1, Patricia Lipski signed and has a duplicate signature on page 1, line 17.

2. On page 11, line 2, John Wesley Gish signed and has a duplicate signature on page 1, line 15.
3. On page 12, line 1, Abe Miller signed and has a duplicate signature on page 1, line 13.
4. On page 14, line 1, Merle Miller signed and has a duplicate signature on page 11, line 8.
5. On page 16, line 2, Jared M Schneider signed and has a duplicate signature on page 1, line 16.
6. On page 18, line 1, Jeffrey Allan Garrett signed and has a duplicate signature on page 11, line 6.
7. On page 19, line 2, Jack Seward, Jr. signed and has a duplicate signature on page 15, line 1.
8. On page 19, line 7, Brenda Charlene Barthelman signed and has a duplicate signature on page 18, line 2.
9. On page 19, line 12, Merle Miller again signed and has a triplicate signature on page 11, line 8.

Signatures from Outside Washington County on Washington County Petitions:

Note: All signatures from outside the county are highlighted in blue and are located in Exhibit A. Proof of residency outside of Washington County is located in Exhibits B and C.

Also note this required disclaimer: Required For Federal and Statewide Petitions: *Petition pages shall contain signatures from only one county. The name of the county must appear on each petition page. This petition page contains the signatures of eligible electors from _____ county.*

1. Marilyn Schrock signed on page 3, line 5. Her listed address is 1676 500th St. SW, Kalona. This address is north of the Washington County line and is located in Johnson County. Attached, please find exhibit B, page 1, which is signed by the Johnson County Auditor's office, affirming that this address is located in Johnson County.
2. Elmer Miller signed on page 3, line 6. His listed address is 1864 Johnson Washington Rd. SW, Kalona. This address is north of the Washington County line and is located in Johnson County. Please find exhibit B, page 2, which is signed by the Johnson County Auditor's office, affirming that this address is located in Johnson County.
3. Kerry Unkrich signed on page 5, line 8. His/Her listed address is 1952 105th St., Winfield. This address is southeast of the Washington County line and is located in Henry County. Attached, please find exhibit C, page 1, which is signed by the Henry County Auditor, affirming that this address is located in Henry County.

4. Wallace Unkrich signed on page 5, line 7. His listed address is 1954 105th St., Winfield. This address is southeast of the Washington County line and is located in Henry County. Attached, please find exhibit C, page 1, which is signed by the Henry County Auditor, affirming that this address is located in Henry County.
5. Unknown signer (illegible, but assumed to be Merle Unkrich) signed on page 3, line 6. The listed address is 1062 James Ave., Winfield. This address is southeast of the Washington County line and is located in Henry County. Attached, please find exhibit C, page 2, which is signed by the Henry County Auditor, affirming that this address is located in Henry County.

Iowa Code § 43.20 and the Secretary of State's Candidate Guide explicate the guidelines for signature collection, and the signature requirements are fixed and clearly delineated in the table found in Exhibit D.

It is clear that due to the invalidity of these 14 signatures, they must be disqualified and removed from the total that Mrs. Caliguiri claimed from Washington County. Furthermore, due to the insufficient number of petition signatures, Mrs. Caliguiri does not qualify to be placed on the ballot for the Republican Primary on June 5th, 2018, for U.S. House of Representatives in Iowa's 2nd Congressional District.

Respectfully Submitted,



Matthew E. Evans

Peters for Congress
Campaign Manager

¹ <https://sos.iowa.gov/elections/pdf/candidates/2018rep2sigchart.pdf>