

STATE OF NEW HAMPSHIRE

ROCKINGHAM COUNTY

SUPERIOR COURT

Docket No.: _____

DANIEL RICHARD

Plaintiff

v.

CHRISTOPHER T. SUNUNU,
GOVERNOR of the “state” of NEW HAMPSHIRE,
In His Official Capacity and Personal Capacity,
and

DAVID SCANLAN,
SECRETARY OF STATE,
In His Official Capacity, and Personal Capacity,
and

JOHN FORMELLA
ATTORNEY GENERAL of the “state” of NEW HAMPSHIRE
In His Official Capacity and Personal Capacity,
and

SHERMAN PACKARD
SPEAKER OF THE HOUSE OF REPRESENTATIVES
In His Official Capacity and Personal Capacity,
and

CHUCK MORSE
PRESIDENT OF THE SENATE
In His Official Capacity and Personal Capacity,
and
KEITH N. LECLAIR
CHAIRMAN OF THE BOARD OF SELECTMAN FOR THE TOWN OF AUBURN
In His Official Capacity and Personal Capacity,
and
DANIEL A. GOONAN
TOWN ADMINSTRATOR OF THE TOWN OF AUBURN
In His Official Capacity and Personal Capacity,

Defendants

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF
DEMAND FOR JURY TRIAL

INTRODUCTION

Plaintiff Daniel Richard brings this Petition for Declaratory and Injunctive Relief against Christopher T. Sununu governor of the “state” of New Hampshire in his official and personal capacity, the Attorney General John Formella in his personal and private capacity, David Scanlan the Secretary of the “state” of New Hampshire in his official and personal capacity. The Speaker of the House of Representatives Sherman Packard in his official and personal capacity, and President of the Senate President Chuck Morse in his official and personal capacity, unconstitutional usurpation of power, exceeding lawful authority on the Rights of the Plaintiff by exercising of non-constitutional personal and

authoritative power that exceeds and in violation of limiting boundaries established by constitution at law.

Specifically, current voting laws within the State of New Hampshire and enforced by the New Hampshire Executive branch of government have been systematically designed and promulgated to permit inhabitants from other jurisdictional states to openly and freely vote within the State of New Hampshire. Altering by statute the exemption for Absentee voting and altering by statute, the manner in which votes are sorted and counted, in violation of the New Hampshire Bill of Rights and the New Hampshire Constitution.

Count I

1. On March 2, 2022, the Plaintiff filed a Remonstrance and served a lawful notice of trespass with the Secretary of State David Scanlan, the office of the Governor, the office of the Attorney General, the Clerk of the House of Representatives and the Clerk of the Senate.

On March 7, 2022 the Plaintiff filed a Remonstrance and served a lawful notice of trespass with the Town of Auburn.

On March 9, 2022 the Plaintiff attempted to vote in the Town of Auburn where the Plaintiff is qualified inhabitant and is registered to vote in said town. The Plaintiff was deprived of his right to vote by the town of Auburn.

Count II

2. The legislature has exercised undelegated powers by ignoring the voter integrity protection detailed in Part II, art. 32. and the usage and custom for more than 195 years of hand counting paper ballots. Part II, art. 32. mandates that three elected officials are to sort and count the votes in an open meeting.

The legislature has created a statutory mechanism by enacting N.H. RSA 656:40, which was written for a trial basis. Said statute introduced and authorized a new manner of counting votes not provided for by Part II, art. 32.

N.H. 656:40, authorizes and unelected body, the “Election Law Commission” oversight over the towns and cities, to authorize local use of programable electronic voting machines **exclusively, without counting the votes in an open meeting, and** without the consent of the inhabitants, required by Part II, art. 100. (Emphasis added).

The legislature cannot delegate the constitutional duties of three elected individuals, whose duty it is today under Part II, art. 32, the mandate to sort and count paper ballots by hand in an open meeting, to using electronic voting machines. The fact of the matter is the legislature has changed by statute, the counting of votes by hand as was customary prior to 1979. Said legislative act created a statutory scheme to allow the use of electronic vote counting device without the consent of the inhabitants. No one disputes that said statute was passed to make it easier to sort and count the vote. The fact of the matter is such a change was done without the consent of the voters required by Part I, art. 1 and Part II, art. 100. Said statute is defective on its face because the legislature has no delegated authority to amend the original intent of the mandatory voter integrity provision of the Constitution which is Part II art. 32.

Count III

3. The national conference of state legislatures devised system standards, testing and certification of voting equipment nationwide.

N.H. has no federal testing or certification requirement, therefore, N.H. is federally required to develop and implement its own. Instead, N.H. is supposed to have a state-specific process to test and approve equipment. Such approval must be written pursuant to the teaching of the Constitution N.H. In this case that

require and amendment of Part II, art. 32, and then the legislature of the whole could then establish such standards and rules, and not an un-elected, unaccountable Ballot Law Commission.

The Plaintiff contends the Defendants, by tampering, modifying and removing components from certain electronic machines have voided the use of these machines.

Count IV

4. The design of these violations against my rights as a 40 year Citizen of the State of New Hampshire which permits resident aliens from other incorporated states by statute N.H. RSA 21:6, RSA 21:6-a, the rights of suffrage, by co-mingling the word resident and inhabitant to imply one equals the other, thereby allowing the act of declaring a residency in this state to be a qualifying event to establishing a domicile for the purpose of voting, in direct violation of Part I, art. 11, and Part II, art. 30. As a voter qualified as the constitution provides, is defined as an inhabitant, a citizen of this State.

Count V

5. N.H. RSA Chapter 657 expands the reason (exemptions) a person may claim in order to exercise an absentee ballot in this State. It is a mechanism to circumvent the Constitutional provisions of Part I, art. 11, for voting in my State of New Hampshire, and is a violation of the laws of the land. The current two constitutional absentee exemptions authorized by Part I, art 11. have not been amended as required by Part I, art. 1. Therefore, the expansion of exemptions in N.H. RSA Chapter 657 have not been authorized by the consent of the inhabitants. Said statutory enactment violates the substantive and procedural due process of Part II, art. 100, required to amend the Part I, art. 11. And further, as no-such amendments have been proposed to the inhabitants of this State to authorize the expansion of the existing exemptions provided for by the Constitution. As there

was no disclosure, there could not be any consent of the inhabitants, therefore RSA Chapter 657, must be void under Part I, art. 1.

Count VI

6. The “state” committed voter-deception upon the **inhabitants** in 1976. The Voters’ Guide language from November 2, 1976 presented wording that was misleading and inappropriately combined into a single ballot question, thus disallowed those examining the questions the opportunity to answer each question independently. Therefore, said changes achieved by this amendment are the basis by which N.H. RSA 21: 6 and RSA 21:6-a, depend upon, **must** be struck down. See exhibit A copy of 1976 Voters Guide, Question 8.
7. All four claims stated herein, allege that the Defendants are causing me direct harm by permitting unqualified voters to vote, permitting unconstitutional exemptions for absentee voting, permitting the use of **an** unconstitutional **mode-of-operation for voting** (via the exclusive use of electronic machines), **thereby** permitting the unconstitutional amendment to the constitution, are all violative of the rights of suffrage protected by the state, as said trespass as they eliminated my vote.
8. When the Constitution is ignored and legislature is allowed to change the laws governing elections, it calls into question the integrity of such elections and the confidence of the voters.¹ When the Plaintiff is deprived of lawful elections, which are not conducted pursuant to the constitution, the Plaintiff rights are denied the protection afforded him under Part I, art 1. and Part I, art. 12. are thereby violated. The legislature’s provision to provide a mechanism for circumventing the constitutional mandates of the Constitution of New Hampshire, violate the substantive and procedural due process required under Part II, art. 100, to amend

¹ The purpose of openly counting of the ballots is not only to observe the accuracy of the count, but also to determine any inappropriate or improprieties in the ballot, which a machine cannot perform.

the Constitution, the Defendants are causing me direct harm, as said actions dilute my vote.

9. **The Defendants currently permit and have endorsed exclusive use in cities and towns of the Dominion Voting Systems machine and the Votingworks² Voting System machine using open-source software, not authorized by the legislature or the Constitution. Both of these voting systems are electronic-type machines and both are known to possess and have the ability to be compromised in their accuracy.** (Emphasis added)

State Constitutional issues

The plaintiff is asserting Six claims against the defendants specifically related to the legislative changes which violate NH Constitutional voting provision and voter qualification, specifically:

Count 1: Plaintiff was denied the right to vote.

Count 2: Plaintiff was deprived of his substantive and procedural due process rights which required to change, who and how the votes are sorted and counted.

Count 3: No constitutional authority or standard for testing or certifying electronic voting machines.

Count 4: Changing definition of a qualified voter by statute.

Count 5: Expanding the exemptions for absentee voting with out the consent of the inhabitants

Count 6: Constitutional amendment, violation of Procedural due process to amend the Constitution. There was no written disclosure to the voter, therefore no consent of the inhabitants.

PARTIES

² Part II, art. 32 has not been amended to authorize the use of vote counting machines.

10. Plaintiff, Daniel Richard an inhabitant of this State who dwelleth and hath a home at 95 Rockingham Rd. Auburn, NH.
11. Defendant, Chris Sununu, is Governor of the state of New Hampshire is being sued in his official and personal capacity. The address of the Governor's office is: Office of the Governor State House 107 North Main Street Concord, NH 03301.
12. Defendant, John Formella, is the Attorney General of the state of New Hampshire is being sued in his official and personal capacity. The address of the Attorney General's Office is 33 Capital St. Concord, NH 03301.
13. Defendant, David Scanlan is the Secretary of state of New Hampshire, and is being sued in his official and personal capacity. The address of the Secretary of State's office is: Office of the Secretary of the State House 107 North Main Street Concord, NH 03301.
14. Defendant, Sherman Packard is Speaker of the House of Representative of the state of New Hampshire, and is being sued in his official and personal capacity. The address of the office is State House 107 North Main Street Concord, NH 03301.
15. Defendant, Chuck Morse is President of the Senate of the state of New Hampshire. The address of the office is State House 107 North Main Street Concord, NH 03301.
16. Defendant, The Town of Auburn, located in Rockingham County N.H. in its official capacity
17. Defendant, Keith N. LeClair is Chairman of the Board of Selectman in his official capacity, for the Town of Auburn,
18. Defendant, Daniel A. Goonan is the Town Administrator in his official capacity, for the Town of Auburn N.H. 03032

JURISDICTION AND VENUE

19. The court has jurisdiction under N.H. RSA 491:7 and jurisdiction to grant declaratory relief RSA 491:22.
20. The Court has personal jurisdiction over the Defendants, as their offices are located in New Hampshire, and the alleged conduct is said to have occurred in New Hampshire.
21. The court has venue under N.H. RSA 507:9. Venue is proper as the Plaintiff is located in Auburn, (Rockingham County).
22. Plaintiff has standing under NH RSA 491:22.
23. This Court has subject matter jurisdiction over this Complaint pursuant to 491:7, and RSA 491:22.
24. Venue is appropriate in Rockingham County pursuant to RSA 507:9 because the Plaintiff claims he was injured in Rockingham County.

CLAIMS UPON WHICH RELIEF CAN BE GRANTED

25. The Plaintiff claims that the Defendants, knowing that they were not licensed or privileged to do so, did commit malfeasance of office by trespassing on the Plaintiffs constitutional voting rights protected by the Bill of Rights, Part I, art.1, art. 2, art. 7, art. 8, art. 11, art 12, art. 14, art. 15, art. 29, art. 37, and Part II, art. 30, art. 32 and art. 100 of the Constitution of New Hampshire bypassing the following legislation, which is now codified in statute law, NH RSA 21:6, N.H. RSA 21:6-a, and N.H. RSA 654:1, N.H. RSA 656:40. N.H. RSA 656:41. RSA:42. N.H. RSA Chapter 657.
26. The combined operation and allowances of the above-mentioned state statutes permits, those residing in N.H. who are not its citizens, whom are citizens of other states, to vote within the State of New Hampshire, and altering by statute, the manner in which votes are sorted and counted, and most importantly examined. Expanding by statute the exemptions for absentee voting, along with the state sanction of said changes, is a violation of the New Hampshire Bill of Rights and the New Hampshire Constitution.

COUNT I

N.H. CONSTITUTION BILL OF RIGHTS, Part I, art.1.
N.H. CONSTITUTION BILL OF RIGHTS, Part I, art.2.
N.H. CONSTITUTION BILL OF RIGHTS, Part I, art.12
N.H. CONSTITUTION BILL OF RIGHTS, Part I, art.15.
N.H. CONSTITUTION BILL OF RIGHTS, Part I, art.29.
N.H. CONSTITUTION BILL OF RIGHTS, Part I, art. 32.
N.H. CONSTITUTION BILL OF RIGHTS, Part I, art.37.
N.H. CONSTITUTION BILL OF RIGHT, Part II, art. 100
N.H. RSA 659:9-a City Clerk Uniform Practices
N.H. RSA 659:12 Who Can Vote.
N.H. RSA 659:13 Obtaining a Ballot.
659:40 Bribing; Intimidation; Suppression. –

27. On March 2, 2022, The Plaintiff had a meeting with Secretary of State, David Scanlan in his office with 10 other people including 3 members of N.H. House Representatives. The Plaintiff expressed his serious concerns and lack of trust over the use of election voting machines. Upon investigating such use, the Plaintiff learned that there were a number of legal issues surrounding the use of electronic voting machines. The Plaintiff delivered in person to Sec. Scanlan, a Remonstrance and a notice of trespass, as the Plaintiff believed that to be his legal remedy under Part I, art. 14, art. 32. The Plaintiff then went on to notify through service the General Court, the Governor's office, the Attorney General office, detailing the trespass upon his constitutional rights.
28. On March 7, I delivered in hand the tax collector Susan Jenkins of the Town of Auburn, an affidavit of notice of trespass, and a copy of the Remonstrance filed with the legislature.
29. On March 9, I checked in to vote with supervisor of the voter checklist and was given a ballot.
30. The Plaintiff asked where the hand counting deposit box was, so that I may have my vote counted pursuant to the Constitution of N.H. Part II, article 32.
31. The Plaintiff was informed that voting machines would be used to count the votes.
32. The Plaintiff objected and politely asked to speak with the Moderator.
33. The Plaintiff was directed to the Town Moderator, Thomas Lacroix, to voice my concerns.

34. Mr. Lacroix was respectful of my concerns and objection.
35. The Plaintiff, asked Mr. Lacroix if he had received my notice of trespass regarding the unconstitutional use of the voting machines, in which he answered yes.
36. The Plaintiff asked My. Lacroix why the town would violate the Constitution, he stated that town Attorney was in receipt of said trespass notice and had advised him ignore the trespass notice and use the machines anyway.
37. The Plaintiff stated that his refusal to count the vote as required by the Constitution, Part II, art. 32. is a denial of my right to vote, by attempted coercion, as the only option made available to me was the use of unconstitutional programable, open source, electronic voting **machines**.
38. The Plaintiff thanked Mr. Lacroix for listening to my objections citing the violation of rights to vote under the State and Federal Constitutions.
39. On or about Mar 31, the Plaintiff contacted the Attorney General's Election Law division to file a complaint for being deprived of the right to vote. The Plaintiff received an E-mail response from Myles Matterson Deputy General Counsel of the Attorney General office, with an attached complaint form. The Plaintiff drafted his response in the form of an affidavit, but was concerned that Attorney General office was involved in instructing towns within this State, to ignore the N.H. Constitution, therefore the Plaintiff chose to file this complaint instead. See attached Exhibit A.
40. Post-election, the Plaintiff called the Town of Auburn, and left a message with the receptionist, to have town legal Counsel return my phone call. Attorney Michael J. Tierney Esq. did return the Plaintiffs phone call. Atty. Tierney explained why the Plaintiff was deprived of his constitutional right to vote. The reason given, was based on the Secretary State's e-mails instructing the towns to ignore the constitution a follow the statute law and to ignore the Plaintiffs notice of trespass. In response to the phone call Atty. Tierney forward the email he received from the Asst. Secretary of State Karen Ladd legal opinion. Apparently, the Deputy Secretary of State had been e-mailing various towns on March 7, 2022, instructing them to simply to ignore multiple inhabitants notice of trespass and continue to use machines unless and until a court of law directs otherwise. See attached e-mail exhibit B. Today I am not permitted to vote in accordance with N.H. Constitution Part II, art. 32.

41. N.H. Constitution Bill of Rights, Part I, art. 14. and art. 15, the Plaintiff authority for bring this civil and criminal complaint:

“An Act relating to Attornies” passed February 17, 1791 “that the plaintiff or defendant in any cause, prosecution or suit, being a citizen of this State, may appear, plead, pursue or defend, in his proper person, or by such other citizen of this state, being of good reputable character and behavior, as he may engage and employ, whether the person so employed be admitted as an attorney at law, or not. Page 100-101 1805, and

Count II

VIOLATION OF THE CONSTITUTIONAL MANDATE OF WHO AND HOW VOTES ARE SORTED AND COUNTED SOFTWARE, PROGRAMMING, AND OF ELECTRONIC VOTING MACHINES

N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 1.
N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 2.
N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 11.
N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 12.
N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 14.
N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 15.
N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 37.

FORM OF GOV. Part II, art. 27.

FORM OF GOV. Part II, art. 30.

FORM OF GOV. Part II, art. 32.

FORM OF GOV Part II, art. 100

THE UNITED STATES CONSTITUTION

Article 1 Section 2.

Article 6,

and the 9th 10th and the 14th Amendments to the U.S. Constitution

42. I adopt all of the preceding paragraphs and incorporate them by reference, as if fully set forth herein.

43. The legislature has violated non-delegation doctrine; “The power of the *Legislative* being derived from the People by a positive voluntary Grant and Institution, can be no other, than what that positive Grant conveyed, which being only to make *Laws*, and not to make *Legislators*, the *Legislative* can have no power to transfer their Authority of making Laws, and place it in other hands.”

Locke, *Two Treatises of Government* (New York: New American Library, Laslett ed, 1963), pp 408-409. Accordingly, “[o]ne of the settled maxims in constitutional law is, that the power conferred upon the legislature to make laws cannot be delegated by that department to any other body or authority.” Cooley, *Constitutional Limitations* (1886), pp 116-117.

44. “[T]he principal function of the separation of powers . . . is to . . . protect individual liberty[.]” *Clinton v City of New York*, 524 US 417, 482; 118 S Ct 2091; 141 L Ed 2d 393 (1998) (Breyer, J., dissenting). “[T]he accumulation of all powers, legislative, executive, and judiciary, in the same hands, whether of one, a few, or many, and whether hereditary, self-appointed, or elective, may justly be pronounced the very definition of tyranny.’ ” *46th Circuit Trial Court v Crawford Co*, 476 Mich 131, 141; 719 NW2d 553 (2006), quoting *The Federalist* No. 47 (Madison) (Rossiter ed, 1961), p 301. And as Montesquieu explained, “[w]hen the legislative and executive powers are united in the same person, or in the same body of magistrates, there can be no liberty; because apprehensions may arise, lest the same monarch or senate should enact tyrannical laws, to execute them in a tyrannical manner.” Baron de Montesquieu, *The Spirit of the Laws* (London: J. Nourse and P. Vaillant, 1758), Book XI, ch 6, p 216.
45. The “Ballot Law Commission” is a creation of the legislature of an un-elected body, which was created by the following unconstitutional statutes; RSA 656:40, RSA 656:41, RSA 656:42. The legislature has delegated to an unelected “Ballot Law Commission, judicial power, legislative power, and executive powers to this un-elected body.
46. The legislature cannot amend the Constitution of N.H. by statute, it therefore cannot delegate by statute N.H. RSA 656:40 any authority to a mayor or alderman of any city, or any selectman of any town, the authority to apply to an unelected “Ballot Law Commission” for permission to use electronic voting machines.
47. N.H. RSA 656:41 grants to an unelected body the “Ballot Law Commission” the authority to police (executive power) the machines, to examine the devices, to

review current and new devices to determine whether the devices require upgrading.

48. There are no established standards or qualifications for the Ballot Law Commission to be qualified to examine electronic voting machines, in order to account such factors as hardware and software standards, policies and procedures, safety requirements, security requirements, and usability. There are no established N.H. standards or laws defining qualifications for examiners of electronic voting machines.
49. N.H. RSA 656:42 grants to an unelected body the “Ballot Law Commission” the authority makes rules, enforced as law. (Legislative Power). The “Ballot Law Commission” rules are not law and cannot be so, Part I, art 12.
50. N.H. RSA 665:1 was enacted in 2003 which delegates to the “Ballot Law Commission” the authority to act as a tribunal, to hear and decide ballot law disputes, and whose decisions shall be final as questions both of law and fact, and no court shall have jurisdiction to review such decisions.
51. The Ballot Law Commission existence violates separation of powers, Part I, art. 37, as this un-elected body has been delegated by statute, legislative power, executive power, and judicial power, by N.H. RSA 656:40, RSA 656:41 and 656:42, which is repugnant and contrary to the Constitution of N.H.
52. Part II, art. 32 was written and ratified in 1784 when there was no electricity or technology. The original intent of this article was used for 195 years, until 1979. The Constitution of N.H. is clear that three individual bodies are required to preserve the integrity of the vote. Such usage and custom were the sorting and counting by three elected officials, the moderator, the selectman and town or city clerk, whose duty it shall be, to sort and count paper ballots by hand by the three

elected officials aforesaid. This is the original intent under the aforesaid common law, *Wooster v. Plymouth*, 62 N.H. 193, 200 (1882).³

53. The use of voting machines comes into existence in 1979 with the following legislative act, NH RSA 656:40. Prior to said statutory changes, voting was conducted by paper ballot, ink, and hand counting which preserve constitutional voter integrity. The use of electronic examination (sorting and counting) of Ballots instead of the human examination by the three individuals elected to perform such a task.
54. Under non delegation doctrine, the legislature cannot delegate the constitutional duties of those three elected individuals, whose duty it is today, the requirement to sort and count the ballots, and not the use of an unconstitutional electronic counting device. No one disputes that said statute was passed to make it easier to sort and count the vote, and such a change was done without the consent of the voters. Said statute is defective on its face because the legislature has no delegated authority to amend the original intent of the mandatory voter integrity provision of the Constitution Part II art. 32, the manner in which votes are to be sorted and counted.
55. NH RSA 656:40 is also defective, as even if the legislature had the authority to pass such a statute, it cannot delegate any discretionary powers of the legislature to an unelected body, “the ballot law commission”. The commission cannot delegate authority to the towns, which the commission its self does not possess. The “Ballot Law Commission” has no authority to make law authorizing the use of electronic voting machines.

³ *Wooster v. Plymouth*, 62 N.H. 193, 200 (1882) below. (quotations omitted, alterations in original) “In interpreting an article in our constitution, we will give the words the same meaning that they must have had to the electorate on the date the vote was cast. In doing so, we must place [ourselves] as nearly as possible in the situation of the parties at the time the instrument was made, that [we] may gather their intention from the language used, viewed in the light of the surrounding circumstances.”

56. The legislature with no authority to do so, enacted NH RSA 656:40 in 1979, which only authorized temporary statutory use of electronic vote counting machines on a trial basis with no end date. 40 years is no longer a trial basis.
57. The fact is, the original intent of the founders was paper ballots and hand counting, and such was used for more than 200 years in this State. Part II, art 32. original intent has not been amended. The legislature is prohibited from exercising undelegated powers, and such legislative actions are a direct violation of the due process required to amend the Constitution of New Hampshire as required in Part II, article 100.
58. The Defendants' sanctioning of the discretionary use of voting machine at the local level also violate the 14th amendment equal protection clause by authorizing unconstitutional use of programmable, open source, electronic vote counting machines in some towns, cities, or other political subdivision of the State or not, depriving the Plaintiff of a lawful count of all the ballots within this State as required by the constitutional voting process established by the people in Part II, art. 32. and the equal protection clause of the N.H. Bill of Rights, Part I, art. 1.
59. The Plaintiff believes that he has been disfranchised, and his vote diluted by said legislative acts, and said injury continues to this day, as said statute and unconstitutional use of programmable, opensource, electronic voting machines is still in effect.
60. Said legislative actions are prohibited, as such actions are repugnant and contrary to Part I, art. 1, art. 2, art. 7, art. 8, art. 11, art.12, art. 15, and Part II, art. 5, art. 30, art. 32, art. 100, and the U.S. Const. Article 1 Section 2, Article 6, and the 9th and 10th Amendments to the U.S. Constitution, which prohibit the legislature from amending the Constitution of New Hampshire without the consent of the inhabitants of this State.

Count III

N.H. CONSTITUTION BILL OF RIGHTS, Part I, art. 1.

N.H. CONSTITUTION BILL OF RIGHTS, Part I, art. 12.
N.H. CONSTITUTION BILL OF RIGHTS, Part I, art. 15.
N.H. CONSTITUTION BILL OF RIGHTS, Part I, art. 29.
N.H. CONSTITUTION BILL OF RIGHTS, Part I, art. 37.
N.H. CONSTITUTION FORM OF GOV. Part II, art. 2.
N.H. CONSTITUTION FORM OF GOV. Part II, art. 5.
N.H. CONSTITUTION FORM OF GOV. Part II, art.32
The 14th Amendment to U.S. Constitution
N.H. RSA 656:42 et seq.

61. I adopt all of the preceding paragraphs and incorporate them by reference, as if fully set forth herein.
62. Part II, art. 2. *“The Supreme Legislative power, within this State, shall be vested in the Senate and House of Representatives,”*. Part II, art. 5 states twice that the legislature’s actions must not be repugnant or contrary to the Constitution; *“That clause, which confers upon the ‘general court’ the authority ‘to make laws’, provides at the same time that they must not be ‘repugnant or contrary to the constitution....’”* *Id.* 210 Merrill v. Sherburne 1818. Mason’s Manual of Legislative Rules of Procedure, Chapter 45, § 518, *A Legislative Body Cannot Delegate Its Powers*, 1. ***“The power of any legislative body to enact legislation or to do any act requiring the use of discretion cannot be delegated to a minority, to committee, to officers or members or to another body.”*** (Emphasis added.)
63. Federal law states in title 29 CFR 1910.399 that if you tamper with any electronic device, you void any safety certification required for use. There is no rule, regulation, or statute referencing any recognized authority or qualified person, to officially certify, the modifications or changes made to a previously listed, labeled, and certified by a nationally recognized testing laboratory (NTRL).

Count IV

N.H. CONSTITUTION BILL OF RIGHTS Part I, art I.
N.H. CONSTITUTION BILL OF RIGHTS Part I, art 7

N.H. CONSTITUTION BILL OF RIGHTS Part I, art 11.
N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 14.
N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 15.
N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 12
N.H. CONSTITUTION BILL OF RIGHTS Part II, art. 30

64. I adopt all of the preceding paragraphs and incorporate them by reference, as if fully set forth herein.

65. The legislature has changed the constitutional definition of a qualified voter by statute, violating the procedural and substantive due process required by Part II, art. 100 to amend the voter qualification, defined by the Constitution of N.H. The laws of land define those people who poses political rights in this State. The word used to define a citizen of this State who possesses political rights, is called an Inhabitant and this word is used in twenty-five places in the Constitution of N.H.⁴

66. The right to elect or be elected is defined as an inhabitant. Part I, art. 11, specifically defines a Qualified voter as an inhabitant in four places; “*All elections are to be free, and every inhabitant of the state of 18 years of age and upwards shall have an equal right to vote in any election. **“Every person shall be considered an inhabitant for the purposes of voting in the town, ward, or unincorporated place where he has his domicile.”***... -see art. 11 above.
(Emphasis added)

67. The founding fathers in 1783, after writing Part I, article 11, included in Part II, the form of government, its very own article, the specific constitutional definition of the word inhabitant (a person with political rights) in Part II, article 30: *And **every person qualified as the constitution provides, shall be considered an inhabitant for the purpose of electing or being elected** into any office or place within this State, in that town, parish and plantation where he **dwelleth and hath***

⁴ Inhabitant is used in Part I, art. 11, art. 12, and Part II, art. 4, art. 5, art. 9, art. 9-a, art. 10, art. 11, art. 14, art. 27, art. 28, art. 29, art. 30, art. 31, art. 32, art. 42 art. 51, art. 56, art. 71, art. 72, of the Constitution of N.H.

his home. was the original text before the 1976 amendment by Question 8 of the Voters' Guide.

68. In 1808, twenty years after the ratification of the U.S. Constitution, the N.H. legislature passed An Act to determine who shall be legal Voters in town meetings, and to secure to the inhabitants of this State their rights of suffrage. Approved December 21, 1808 [chapter 49] defined who was a citizen of this State (a person native born or naturalized to the State). It defined how a citizen of the United States (a citizen of another state by birth or naturalization), becomes a citizen of this State upon meeting the residency requirements of this State. Said residency requirement was identical (two years) to Federal durational residency requirement to become a citizen of the United States under the federal law, and such was the law of the land until 1973.
69. N.H. HB 363 in 1973 amended [chapter 54] and removed the descriptive language from the statutes, that only a Citizen of the State of New Hampshire could vote in our elections, thus allowing resident aliens (citizens of other states residing in N.H.) the right to vote in New Hampshire elections.
70. The original law of 1808 Chapter 49:
- Section 1. *Be it enacted by the Senate and House of Representatives in General Court convened. That every male inhabitant of each town and parish with town privileges, and places unincorporated in this State, (being a natural born or naturalized citizen of the United States) of twenty-one years of age and upwards, excepting paupers and persons excused from paying taxes at their own request, shall have a right, at the annual and other meetings of **the inhabitants** of said towns and parishes, to vote in the town or parish wherein he dwells and hath his home; — provided however, **That no person shall be considered an inhabitant in any town or parish in this State for the purpose of voting, unless he has resided in such place six months, or has become a free-holder.***
71. Sec. 2. *And be it further enacted, That no person, not being a citizen of this State or of the United States, shall be entitled to vote at any town meeting for the choice*

of State, County or town officers, unless he shall have resided within this State two years and shall have made oath before some Justice of the Peace, or other person authorized to administer oaths — That he will bear faith and true allegiance to the State of New Hampshire, and to the United States, and will support the Constitutions thereof. Provided however, That no person, not a citizen of this State or of the United States, shall be considered qualified to fill any County or State office.

72. The last printing of the original 1808 public policy [chapter 49] version was in 1955, and was in effect until 1973. Chapter 54. Section 1. “natural born” had been amended to read “being a native.” The original prohibition clause in Section 2. was amended into NH RSA 54:7 Aliens, “No alien not naturalized shall be entitled to vote at any town-meetings.” ⁵These state statutes refer to state citizenship, as federal naturalization law applies to foreign nationals not born or naturalized in the United States of America.

“The right or privilege of voting is one arising under the constitution of the state, and not under the constitution of the United States.” The qualifications are different in the different states. Citizenship, age, sex, residence, are variously required in the different states, or may be so. If the right belongs to any particular person, it is because such person is entitled to it by the laws of the state where he offers to exercise it, and not because of citizenship of the United States.” UNITED STATES V. ANTHONY. June 18, 1873.

73. Non-Citizen of this State; Persons in the State not its citizens are either: (a) Citizens of other States; or (b) Resident Aliens.
74. ***“One who has been for many years a citizen of a state is still a citizen thereof although residing temporarily in another state, but without any purpose of***

⁵ This is referring to naturalization law referenced in chapter 49, sec.2. as previously stated,.

abandoning citizenship in the former". Steigleder v. McQuesten, 198 U.S. 141 (1905)

75. "*Residence and Citizenship* are wholly different things within the meaning of the Constitution and the laws defining and regulating the jurisdiction of the circuit courts of the United States; ***and a mere averment of residence in a particular State is not an averment of Citizenship in that state for the purposes of jurisdiction.***" Steigleder v. McQuesten, 198 U.S. 143. (Emphasis added)
76. The 1973 N.H. legislature passed HB 363 which is the beginning of the problem, as it was proposed for a nonexistent problem, (see exhibit B, archive copy of May 22, 1973 Senate Committee on Ex. Depts., Munic. & County Govt's.) Rep Sanborn's language in the bill is a series of negligent or mis-statements "Some 8 or 10 years ago in N.H. law," is grossly inaccurate. The public policy was 165 years old in 1973 and the removal of the definition of "being a" and "native or naturalized" abolishes State Citizenship definition and the power of Sovereign State to naturalize Resident Aliens unto its self. This denies the State of New Hampshire the highest exercise of its Sovereign power as a State to choose who are its Citizens.
77. Rep. Sanborn's claims that his children were born in foreign country has no bearing on the proposed removal of descriptive language in the statute. Children born abroad of American parents; citizens of the United States have always inherited the nationality of their parents, as detailed by the first Naturalization Act of 1790:
- "And the children of citizens of the United States that may be born beyond Sea, or out of the limits of the United States, shall be considered as natural born citizens: Provided, that the right of citizenship shall not descend to persons whose fathers have never been resident in the United States"* An act to establish a uniform Rule of Naturalization (March 26, 1790).

78. Rep. Sanborn confesses that “This does nothing to their voting rights except that it is a technicality and the law needs to be corrected to include the rights of a voter born outside this country of American parents.” (See exhibit B)
79. If existing public policy does nothing to their voting rights why is such an amendment being proposed when the federal law governs the issue and the remedy. Rep. Sanborn propose is a solution, for a nonexistent problem?
80. Sen. Johnson: “This merely establishes the right to a child born overseas of American parents to vote?” (See exhibit B)
81. Rep. Sanborn: “That is correct. I am sure that if we’re challenged the federal law would find the error in New Hampshire law.” (See exhibit B) HB 363 is void for lack of jurisdiction. The General Court cannot amend the Constitution of N.H. in direct violation Part II, art. 100. and surrender the sovereignty of the State to decide for itself who are its citizens. The stated purpose of the amendment was to confer voting privileges of foreign-born children of American parents. Children born of Citizens of New Hampshire living outside of this country are automatically considered natural born citizens of New Hampshire and citizens of the United States, under federal naturalization law and the 14th Amendment. This statutory change cannot achieve its stated goal as the remedy is in federal jurisdiction.
82. The stated purpose and the consequence of the redaction of the original descriptive text allows resident aliens (who are citizens of the United States) (citizens of any of the 49 other states and federal territory) to move to our State and vote in are election without the 189-year requirement that they be naturalized to the State, and become a Citizen of the State of New Hampshire, in order to qualify as an inhabitant of this State.

83. NH RSA 21:6, NH RSA 21:6-a, alter by statute the Constitutional voter qualifications, by allowing unqualified resident aliens the right to vote, in violation of Part I, art. 11.⁶
84. Residents have no constitutional right of suffrage. This statute co-mingles the word resident and inhabitant to imply one equals the other. Said statutes have created a mechanism where all that is needed to vote in N.H. is a declaration of residency, in the form of preprinted affidavit, which is provided by the state at the polling station. In turn a potentially unqualified voter receives a bona fide ballot, which is then counted as legitimate vote.
85. Under the Constitution of New Hampshire Part II, art. 5 and federal immigration law, a resident is an alien to the State, or the United States, as they are not a citizen thereof. Part II, art. 5 provides that those residing within the State shall be subject to our laws, our courts, and taxation, as residents (aliens), are those people who are not citizens of this State, therefore they are not qualified to vote as that right is reserved to those persons defined by the Constitution of N.H. as an inhabitant of this State.
86. The word resident only appears in this one place (Part II, art. 5) in the Constitution of N.H. The word resident does not appear in Part I, the Bill of Rights. The words used in the Bill of Rights to describe those people who possess said rights, and whom are entitled to the protection of the State, are called citizens of this State, and those who possess political rights within this State are called inhabitants. NH RSA 21:6 and NH RSA 21:6-a, is repugnant and contrary to the constitutions, as it conveys political rights by allowing the act of declaring a residency to be a qualifying event to establishing a domicile for the purpose of voting, in direct violation of Part I, art. 11, and Part II, art. 30.

⁶ **NH RSA 21:6 Resident; Inhabitant.** – “A resident or inhabitant or both of this state and of any city, town, or other political subdivision of this state shall be a person who is domiciled or has a place of abode or both in this state and in any city, town, or other political subdivision of this state”,...

NH RSA 21:6-a Residence. —“Residence or residency shall mean a person's place of abode or domicile.” Reinforces 21:6 by statute, the right suffrage for a resident, that which Constitution does not provide.

87. The aforesaid actions by the Defendants are in fact prohibited, as such actions are repugnant and contrary to Part I, art. 1, art. 2, art. 7, art. 8, art. 11, art. 12, art. 15, and Part II, art. 5, art. 30, art. 32, art. 100, of the N.H. Constitution, and Article 1 Section 2, Article 6, the 9th and 10th Amendments to the U.S. Constitution, which prohibit the legislature from amending the Constitution of New Hampshire without the consent of the inhabitants of this State.

Count V

EXPANDING BY STATUTE THE EXEMPTIONS FOR ABSENTEE VOTING

N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 1.
N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 2.
N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 11.
N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 12.
N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 14.
N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 15.
N.H. CONSTITUTION FORM OF GOV. Part II, art. 27.
N.H. CONSTITUTION FORM OF GOV. Part II, art. 30.
N.H. CONSTITUTION FORM OF GOV. Part II, art. 100

THE UNITED STATES CONSTITUTION

Article 1 Section 2.

Article 6,

and the 9th 10th and 14th Amendments to the U.S. Constitution

88. I adopt all of the preceding paragraphs and incorporate them by reference, as if fully set forth herein.

89. Absentee voting did not exist in this State until Part I, article 11 was amended in 1942. Part I, art 11, has been amended 7 times since 1903. Absentee voting was not permitted until the 1942 amendment, which was submitted to the inhabitants as required by the constitution. Said amendment was submitted to the inhabitants for their consent as required by Part I, art. 1, and art. 12, and Part II, art. 100. Absentee voting in Part I, art. 11 was amended again in 1956 by the same aforesaid manner. The 1942 and 1956 amendments of Part I, art. 11 (the creation

of absentee voting) and their precedence, reaffirm Part I, art. 1, that all government of right originates from the people and is founded in their consent.

90. The current NH RSA chapter 657 begins with HB 1266 which was passed before the 2020 election, under the Covid 19 lock down, which led to the current N.H. RSA Chapter 657. Said exemption become HB 144 and SB 31 which amends RSA Chapter 657. Said statutes expand the exceptions by which absentee voting may be claimed or exercised, in direct violation of the current constitutional requirements defined by Part I, art. 11. N.H. RSA Chapter 657 expands constitutional exemptions for absentee voting without the due process required to amend or alter the constitutional requirements, without the consent of the voters as required by the Constitution.

91. The Bill of Rights, Part I, art 11. Delegates to the general court that it:

*“shall provide by law for voting by **“qualified” voters** who at the time of the biennial or state elections, or of the primary elections therefor, or of city elections, or of town elections by official ballot, **are absent from the city or town of which they are inhabitants**, or who by **reason of physical disability are unable to vote in person**, in the choice of any officer or officers to be elected or upon any question submitted at such election.”*

This section makes two important points. First that voters must be **“qualified”** as the constitution provides, Part I, art. 11 and Part II, art. 30; qualified voters are called **“inhabitants”** and not residents. (Emphasis added).⁷

92. NH RSA 657:1, grants by statute the following exemptions for absentee voting, that which the constitution does not provide, in direct violation of the mandate detailed in Part II. art. 27 and Part II, art. 30. which reaffirm the fact that voting laws must be written pursuant to the Constitutions. Here are the new statutory exemptions:

⁷ This is only place in the N.H. Constitution that instructs the legislature to act relative to voting.

Eligibility
Section 657:1

657:1 Absence, Religious Observance, and Disability Absentee Voting. –

I. Any person who will be absent on the day of any state election from the city, town, or unincorporated place in which he or she is registered to vote or who cannot appear in public on any election day because of his or her observance of a religious commitment or who is unable to vote there in person by reason of physical disability may vote at such elections as provided in this chapter. A person who is unable to appear at any time during polling hours at his or her polling place because of an employment obligation shall be considered absent for purposes of this chapter. For the purposes of this section, the term "employment" shall include the care of children and infirm adults, with or without compensation.

II. When the National Weather Service has issued a winter storm warning, blizzard warning, or ice storm warning for election day applicable to the city, town, or unincorporated place:

(a) A person who otherwise would have voted in person but has concerns for his or her safety traveling in the storm, shall be considered absent for purposes of this chapter and may vote absentee on the day immediately prior to the election.

(b) A person who cares for children or infirm adults who reasonably anticipates that school, child care, or adult care will be canceled, who otherwise would have voted in person but will be deterred from voting by the need to care for children or infirm adults, shall be considered absent for purposes of this chapter and may vote absentee on the day immediately prior to the election.

93. Former Secretary of State William Gardner stated publicly, the absentee voting expansion of exemptions by statute has increase absentee voting participation from an average of 4% of the total in 2014, 2016, 2018 to a new total of 30.6% in 2020. HB 1266 was passed under a state of emergency declared for Covid-19 in 2020 which led to a dramatic increase after its passage. The Plaintiff believes that such unconstitutional changes to absentee voting exceptions have disenfranchised the Plaintiff, and diluted his vote, by said legislative acts. The legislature has no delegated authority to amend, nor to grant absentee rights or exceptions by statute. Burt v. Speaker (2020). The opposite is true, said legislative actions are prohibited, as such actions are repugnant and contrary to Part I, art. 1, art. 2, art. 7, art. 8, art. 11, art.12, art. 14. art. 15, and Part II, art. 5, art. 30, art. 32, art. 100, and Article 1 Section 2, Article 6, and the 9th and 10th Amendments to the U.S. Constitution,

which prohibit the legislature from amending the Constitution of New Hampshire without the consent of the inhabitants of this State.

94. The Plaintiff has been injured by Such actions which have subjected the Plaintiff to unconstitutional laws, taxes, representation and changes to our form of government not consented to by the inhabitants of this State and secured by the State and Federal Constitutions.

95. I adopt all of the preceding paragraphs and incorporate them by reference, as if fully set forth herein.

Count VI

VIOLATION OF SUBSTANTIVE AND PROCEDURAL DUE PROCESS REQUIRED TO AMEND THE CONSTITUTIONAL VOTER QUALIFICATION

1976 Voters' Guide, Question 8 (see exhibit C)

N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 1.

N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 2.

N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 11.

N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 12.

N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 14.

N.H. CONSTITUTION BILL OF RIGHTS Part I, art. 15.

N.H. CONSTITUTION Part II, art. 27.

N.H. CONSTITUTION Part II, art. 30.

N.H. CONSTITUTION Part II, art. 32.

N.H. CONSTITUTION Part II, art. 100

THE UNITED STATES CONSTITUTION

Article 1 Section 2.

Article 6,

and the 9th 10th and 14th Amendments to the U.S. Constitution

96. I adopt all of the preceding paragraphs and incorporate them by reference, as if fully set forth herein.

97. The petition now before this court alleges that the 1976 Question 8, as submitted to the voters, incorrectly stated the effect of the proposed amendments, and failed to give the voters an accurate idea of the question or questions to be voted upon. The Plaintiff seeks a declaratory judgment as to the validity of the adoption of the amendments involved, claiming they are defective on their face, and the Plaintiff

claims that said question would be declared unconstitutional under *Gerber v. King*, 107 NH 495. *CONCRETE, INC. v. RHEAUME BUILDERS* 101 N.H. 59 (1957), *Penrod v. Crowley*, 82 Idaho 511)

98. N.H. RSA 21:6 and RSA 21:6-a rely on this change to constitutional definition of a qualified voter. Question 8 was not properly presented to the inhabitants of this State. Question 8 was confusing and impossible to answer correctly and its resulting changes and damages could not have been understood by the voters.

99. A constitutional convention was convened in 1974. Said convention drafted and proposed to the voters', "Question 8" with its 5 sub-questions, with one yes or no choice. This resulted in multiple constitutional amendments which were not disclosed to the voters, nor could the voters have understood such confusing questions, choices, or outcomes. Here is Question 8:

100. QUESTION: 8. Are you in favor of amending the Constitution to make the following changes relating to elections:

- a) to reduce the minimum age of voters to eighteen;
- b) to make domicile rather than being an inhabitant a prerequisite for voting privilege;
- c) to repeal certain provisions relating to voting in unincorporated places;
- d) to specify that ballots and notification of winners in biennial election contest will be handled by the Secretary of State; and
- e) to provide the right to vote by absentee ballot in biennial or state elections, or in the primary elections therefor, or in city elections or town elections by official ballot?
- f) The voters were given one yes or no choice for all five questions. See attached exhibit A.

101. The actual outcome of Question 8 removes all reference to the words "dwell" and "dwelleth and hath a home" which are repealed in three places in the

constitution in which it had been used for the previous one hundred ninety-three years, with no disclosure to the voters.

102. The passage of Question 8 amended Part I, Article 13, Article 28, and it also amended Article 30, which removed all reference to “dwell” and “dwelleth and hath a home.” Exchanging the words “dwelleth and hath his home” for “domicile” was not disclosed to the voters, but rather question b) proposed a different outcome which is evidenced by these bad faith actions by all the elected officials involved and the Defendants for failure to act after lawful notice of trespass. The amendment replaced the common-law definition of “dwell” and “dwelleth and hath a home”⁸ for domicile which was not a question presented to the inhabitants.

103. The contention made in support of the petition is that an affirmative vote on the question before the voters was a vote for a change which the amendments proposed by the Legislature would not accomplish. Analysis of the question voted upon confirms this view.

104. **Question a)**

Voters who examined the 1976 "Voters' Guide" could not have learned the true intent of questions as proposed to them in Question 8 of the voters' guide. It is a fact that the constitution as amended is different from its stated objective, as detailed in this claim.

105. In point of fact, no article of the constitution was proposed by the Legislature to voters in the Question 8 of the 1976 voters' guide.

106. In this connection Question 8 was misleading for the aforesaid reasons. It failed to disclose the actual outcome of the vote. An ordinary voter could not have understood multiple questions as proposed or the outcome of a single yes vote, or a yes vote for one question and no vote for another.

107. Voters' Guide language⁹ from November 2, 1976 presented wording that was misleading and inappropriately combined into a single ballot question thus

⁹ “several constitutional provisions governing the right to vote and to hold office are unnecessarily complicated and confusing. For example, although the voting age is already 18 and the reference in the Constitution to

disallowed those examining the questions the opportunity to answer each question independently. It admits that the 1st portion of the question is already law. So why is it there? Question 8, a) to reduce the voting age of voters to eighteen;

The first question is already law as ratified the inhabitant of N.H in 1974. The legislature submitted a proper amendment with one question and one answer, see the attached copy of the November 5, 1974 Voters' Guide. This is the question presented to the voters, 6; **Are you in favor of amending the New Hampshire Constitution to conform with the Federal requirements allowing eighteen-year-olds to vote?** (Emphasis added).

This was 1 yes or no question. This amendment was passed in the affirmative by the voters by 71.9% as preserved in the State archives. This Voters Guide also states; AT THE PRESENT TIME: The State Constitution provides that in order to vote, a person must be twenty-one and ***an inhabitant of the district where he votes***. The 26th Amendment was ratified on July 1, 1971.

108. The voter examining 1976 Question 8 was only presented with one yes or no choice for five questions. A voter could not say no to the rest of the questions if the first question asked repeats the same question already approved of by the recent amendments of the State and Federal Constitutions over the voting age. The Plaintiff believes this apparent deception is intentional as the office of the Governor, the office of the Attorney General, the office the Secretary of State, and the office of legislative services are supposed to prevent such legislative actions that our repugnant or contrary to the constitutions.

Question b)

109. The following is the question and expected outcome of a yes answer to Question b) which stated as its intended purpose "**b) to make domicile rather than**

"inhabitant" is already interpreted to mean a person's "domicile" neither of these facts is clear in the Constitution." – Voters Guide, November 2, 1976

being an inhabitant a prerequisite for voting privilege;” the voters were told on the second page of the voters’ guide that IF THE AMENDMENT IS ADOPTED: ...the following changes will occur:

“b) Every eligible New Hampshire citizen may choose one place within the state to exercise the right to vote.”

110. Said question failed to achieve its stated objective. The word Domicile is not exchanged for inhabitant, which in fact must remain as it is required in twenty-five places in the Constitution. Said amendment after the election ends up replacing the words used in common law “dwelleth and hath his home.” See, *Newburger v. Peterson*, 344 F. Supp. 559 (D.N.H. 1972) “*But it is also stipulated that New Hampshire's venerable common law of domicile, as embodied in State v. Daniels*, 44 N.H. 383 (1862).

No mention of a citizen of this State becomes part of this amendment in any way, which stated as an outcome by the voters’ guide.

111. The 1974 N.H. Constitutional Convention voted for replacing domicile for inhabitant. The voters of 1976 were presented the same Question 8, b) **to make domicile rather than being an inhabitant a prerequisite for voting privilege;**”

Since the outcome of the changes achieved by the passage of question 8 are different than that which is stated in 1976 voters’ guide, the voters could not have known what they were actually voting for. Such confusing or deceptive language, or lack of clear intent was ruled unconstitutional by *Gerber vs King* 107 N.H. 495 (1967), *CONCRETE, INC. v. RHEAUME BUILDERS* 101 N.H. 59 (1957), *Penrod v. Crowley*, 82 Idaho 511)

112. The word Inhabitant and its definition were not amended or repealed and still appear in 25 places in constitution as stated above. The voters were not presented the amendment as ratified. The effects of Question 8 now appear in the

constitution foot notes: *“Amended 1976 twice deleting reference to electing and substituting “is domiciled” for “dwelleth and hath his home.”* This change was not submitted to the constitutional convention or the voters in 1976 voters’ guide.

113. If inhabitant is already interpreted to mean a person’s “domicile” why is it there and with 3 other questions? The word domicile does not exist in the Constitution until this amendment is passed. The amendment fails to achieve its stated objective and domicile is inserted to replace its common law definition of “dwelleth an hath his home” and it does not replace the word inhabitant. See *Gerber vs King* 107 N.H. 495 (1967), *CONCRETE, INC. v. RHEAUME BUILDERS* 101 N.H. 59 (1957), *Penrod v. Crowley*, 82 Idaho 511), and

Question c)

114. *c) to repeal certain provisions relating to voting in unincorporated places;*

The voters were told on the second page of the voters’ guide that IF THE AMENDMENT IS ADOPTED: ...the following changes will occur; *c) Provisions relating to voting in unincorporated places will be covered in a more appropriated part of the Constitution.*

115. In point of fact, no article of the constitution was proposed by the Legislature to voters in question c) of the voters’ guide. Said question is defective on its face, as none of the relevant articles to unincorporated voting were presented to voters to consider, thereby depriving the inhabitants of the knowledge of actual changes proposed, so that inhabitants accept or reject such a change, as required by Part I, art 1.

116. In this connection Question 8 was misleading for the aforesaid reasons, as it also failed to disclose the actual outcome of the vote. An ordinary voter could not have understood multiple questions as proposed or the outcome of one yes or no vote, as there was no ability to vote no for one question and yes for another.

Question d)

117. *d) to specify that receipt and counting of ballots and notification of winners in biennial election contest will be handled by the Secretary of State: and...* the voters were told on the second page of the voters' guide that IF THE AMENDMENT IS ADOPTED: ...the following changes will occur: *The Secretary of State will be constitutionally required to examine the records or the votes cast and to notify winners of elections.*

118. In point of fact, no article of the constitution was proposed by the Legislature to voters in question d) of the voters' guide. Said question is defective on its face, as none of the relevant articles to amending to powers of the Secretary of State were presented to voters to consider, thereby depriving the inhabitants of the knowledge of actual changes proposed, so that inhabitants may consent to as required by Part I, art 1.

119. In this connection Question d) was misleading for the aforesaid reasons, the Secretary of State already possessed such constitutional authority, and an ordinary voter could not have understood the questions proposed or the outcome of a yes vote, or a yes vote for one question and no vote for another.

Question e)

120. The following is the question and the expected outcome of a yes answer to Question e) which stated, as its intended purpose: *"e) to provide the right to vote by absentee ballot in biennial or state elections, or in the primary elections therefor, or in city elections or town elections by official ballot?"*

The voters were told on the second page of the voters' guide that IF THE AMENDMENT IS ADOPTED: ...the following changes will occur: *The right of every person entitled to and wishing to vote by absentee ballot in the specified elections will be constitutionally guaranteed.*

121. This is voter deception by adding proposed changes mixed with words in phases already incorporated permitted within the constitution, by bad faith state

actors. Absentee voting is already law since 1942 by amendment of Part I, art. 11 and amendment of 1956 of Part I, art. 11.

122. Article 11 of Part I was not in the voter guide which was repealed with no consent.
123. Article 13 of Part II was not in the voters' guide and was repealed with no consent. This also repealed an article referencing the word dwell.
124. Article 28 of Part II was not in the voter's guide and was repealed with no consent. This also repealed an article referencing the word dwell.
125. Article 30 Part II was not in the voters' guide and neither was twice deleting reference to electing. Also, substituting "is domiciled" for "dwelleth and hath his home" is misleading as the said word and phrase are synonymous.
126. This is an attempt to redefine the definition of dwelleth and hath his home to the word domicile. Also,
127. Article 31 Part II was not in the voters' guide and was repealed with no consent.
128. Also, the 1976 Voters' guide, Question 8 as presented to the voters, is illegal under the current NH RSA 663:3 Form of Ballot: *A constitutional question shall include, in the text of the question, the text of the article of the constitution as it is proposed to be amended.* See *Gerber vs King* 107 N.H. 495 (1967), *CONCRETE, INC. v. RHEAUME BUILDERS* 101 N.H. 59 (1957), *Penrod v. Crowley*, 82 Idaho 511), and

CONSTITUTIONAL ISSUES

129. The Plaintiff claims that he has been disenfranchised and his vote diluted by the state's passage and use of the following statutes, NH RSA 21:6, NH RSA 21:6-a, and NH RSA 654:1. NH RSA 654:13, NH RSA 656:40, NH RSA Chapter 657. Each of these statutes has the same constitutional conflict. That flaw is the intentional exercise of undelegated powers by bad faith state actors, altering the

constitutional mandates (voting requirements and definitions), by legislative and executive actions, in direct violation of the procedural due process required to amend the relevant articles of the Constitution of N.H. No branch of government has any delegated authority to amend the laws of the land, *Burt v. Speaker* (2020).

The legislature may not, even in the exercise of its "absolute" internal rulemaking authority, violate constitutional limitations. Id. at 284, 288. Indeed, "[n]o branch of State government can lawfully perform any act which violates the State Constitution." LaFrance, 124 N.H. at 176. Therefore, "[a]ny legislative act violating the constitution or infringing on its provisions must be void because the legislature, when it steps beyond its bounds, acts without authority." Id. at 177.

And, as all government of right originates from the people and is founded in their consent, Part I, art. 1.

130. Citing *Wooster v. Plymouth* (1882):

"The distinctive character of our bill of rights as the first chapter of constitutional law in which the people, as the original sovereigns, before delegating certain public powers in the second chapter, reserve for themselves, as subjects of their collective body politic, certain rights which they do not give to that body,..."

The division of the constitution into two parts was not made without a purpose, and the name of each part is not without significance. The first is a "bill of rights:" the second is a "form of government." The second is, in general, a grant of powers, made by the people to "magistrates and officers of government," who are declared (in Part I, art. 8) to be the grantors' "agents." The first contains a list of rights not surrendered by the people when they formed themselves into a state. Part I, arts. 1, 2, 3; Part II, art. 1. By the reservation of these, they limited the powers they granted in the second part, and exempted themselves, to the stipulated

extent, from the authority of the government they created.” Wooster v. Plymouth (1882).

131. The Constitution of New Hampshire Bill of Rights establishes in Part I, art. 1, that “**all government of right originates from the people, is founded in consent**,...(emphasis added)

132. Bill of Rights, Part I, art. 2. Established the entire purpose of a written constitution, by the declaration of enumerated natural rights, the people defined the very reason a government was created for in the first place, the protection of said rights: “**All men have certain natural, essential, and inherent rights among which are, the enjoying and defending life and liberty; acquiring, possessing, and protecting, property; and, in a word, of seeking and obtaining happiness.**” (Emphasis added)

133. The people as the original sovereigns, declared in Part I, Bill of Rights, art. VII that all power not delegated to the State or Federal government by either the State or Federal Constitutions is retained by the people:

“**The people of this State, have the sole and exclusive right of governing themselves as a free, sovereign and independent State, and do, and forever hereafter shall exercise, and enjoy every power, jurisdiction and right pertaining thereto**, which is not, or may not hereafter be by them expressly **delegated** to the United States of America in Congress assembled.” (Emphasis added)

134. Article 6 of the United States Constitution, and the 9th and 10th Amendments of the U.S. Constitution reinforce the principal that all power not delegated to the State by the people, or delegated by the States to the Federal government, is reserved to the people as it is not delegated.

135. Article 6 of the United States Constitution: “**This Constitution, and the laws which shall be made in pursuance thereof;**” (Emphasis added)

136. The 9th Amendment of the U.S. Constitution: **“The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people.”** (Emphasis added)
137. 10th amendment of the U.S. Constitution: **“The powers not delegated to the United States by the Constitution, nor prohibited by it to the states, are reserved to the states respectively, or to the people.”** (Emphasis added)
138. Part I, article VII, the sovereignty of the people is reinforced by Part I, art. VIII: **“All power residing in, and being derived from, the people, all the magistrates and officers of government are their substitutes and agents, and at all times accountable to them.”** (Emphasis added)
139. The Constitution of New Hampshire is a social compact, a trust indenture. The people are the creator, and beneficiary of the trust; and by their allegiance and financial support, they are entitled to the protection of the laws of the land by the State. Public officials are defined by Part I, article 8, as public servants (trustees), who swear an oath under Part II, art. 84. to uphold the Constitution. In exchange trustees receive an emolument in kind, establishing a fiduciary duty upon the trustees, to uphold the provisions of the trust indenture, the Constitution of N.H. In law, the process of choosing of a domicile within the jurisdiction of a specific government is called “animus manendi.” That choice makes you a consenting party to the “civil contract” “social compact” and “private law” that attaches to and therefore protects all “inhabitants” and things physically situated on or within that specific territory, venue, and jurisdiction.
140. Part I, art 12 establishes that Taxation and Protection are reciprocal and that **“every member of the community has a right to be protected by it, in the enjoyment of his life, liberty, and property; he is therefore bound to contribute his share in the expense of such protection,”** (Emphasis added)
141. The second part of Part I, art. 12 is the private right of the people by its declaration in the Bill of Rights, which established a prohibition upon Part II, form

of government from violating the consent clause of Part I, art. 1. And Part I, art. 12:

“But no part of a man’s property shall be taken from him, or applied to public uses, without his own consent, or that of the representative body of the people (voters). Nor are the inhabitants of this State controllable by any other laws than those to which they, or their representative body, have given their consent.”
(Emphasis added).

142. Due process of law, Part I, art. 14: *Every subject of this State is entitled to a certain remedy, by having recourse to the laws, for all injuries he may receive in his person, property, or character; to obtain right and justice freely, without being obliged to purchase it; completely, and without any denial; promptly, and without delay; conformably to the laws.*

143. Part I, article 15, the second part, declares that people shall not be deprived of due process of law or put out of the protection of the law; *“No subject shall be arrested, imprisoned, despoiled, or deprived of his property, immunities, or privileges, put out of the protection of the law, exiled or deprived of his life, liberty, or estate, but by the judgment of his peers, or the law of the land;”* Part II art. 101 defines the articles of the Constitution of N.H. “some of the Laws of the Land.”

The clause of the fifteenth article of the bill in which it is reserved "is so manifestly conformable to the words of Magna Charta, that we are not to consider it as a newly invented phrase, first used, by the makers of our constitution; but we are to look at it as the adoption of one of the great securities of private right, handed down to us as among the liberties and privileges which our ancestors enjoyed at the time of their emigration, and claimed to hold and retain as their birthright. These terms, in this connection, cannot, we think, be used, in their most bald and literal sense, to mean the law of the land at the time of the trial; because the laws

may be shaped and altered by the legislature, from time to time; and such a provision, intended to prohibit the making of any law impairing the ancient rights and liberties of the subject, would under such a construction be wholly nugatory and void. **The legislature might simply change the law by statute,** and thus remove the landmark and barrier intended to be set up by this provision in the bill of rights. It must therefore have intended the ancient established law and course of legal proceedings, by an adherence to which our ancestors in England, before the 197 settlement of this country, and the emigrants themselves and their descendants, had found *197 safety for their personal rights." *Jones v. Robbins*, 8 Gray 329, 342, 343, 344. **"This provision of the bill of rights was unquestionably designed to restrain the legislature, as well as the other branches of government, from all arbitrary interference with private rights."** (emphasis added) It was adopted from Magna Charta, and was justly considered by our forefathers, long before the formation of our constitution, as constituting the most efficient security of their rights and liberties." *Mason's argument for the plaintiff in Dartmouth College v. Woodward*, *Farrar's Report*, 56. In the decision of that case, this court said, — "The object of the clause in our bill of rights seems always to have been understood in this state to be the protection of private rights." 1 N.H. 129. *Wooster v. Plymouth* (1882). This case has been cited 48-times since 1882, last cited in 2019 and it currently represents' New Hampshire common law and constitutional standard.

144. No constitutional convention has been convened for the purpose of amending the legislature's power. The legislature has no delegated power to change by statute the voting laws established by the people in the Constitution and required in Part II, art.30.
145. Nor have any proposed amendments, been submitted to the people for their consent to change the laws of the land defined by the Constitution by the inhabitants.

146. Part II, art. 5 states twice that the legislature's actions must not be repugnant or contrary to the Constitution; "*That clause, which confers upon the 'general court' the authority 'to make laws', provides at the same time that they must not be 'repugnant or contrary to the constitution....'*" *Id.* 210 Merrill v. Sherburne 1818
147. Part II, art. 27. states that voter qualifications are defined by the constitution: "**The freeholders and other inhabitants of each district, qualified as in this constitution is provided...**" (Emphasis added)
148. Part II, art. 30. states that "**Every person qualified as the constitution provides,**" (Emphasis added). These articles reaffirm the sovereignty of the people, that the laws of land governing voting, were created by the people under the authority of Part I, art. 1, that all government of right originates from the people, is founded in their consent, and not the consent of the legislature. Public servants who are defined by Part I, art.8, don't have any authority to change the qualifications for voting established by the inhabitants.
149. This is important: the Constitution of N.H. Part II, art. 32, defines who, and how the votes are to be sorted and counted. Part I, art. 32 went in to effect on June 2, 1784. It Defines that the moderator will receive the votes of all the inhabitants in such towns or wards, and that it shall be the duty of the selectman to attend, and that the moderator, in said open meeting, shall sort and count the votes in the presence of the selectman and town or city clerk. This provision of the constitution remains as it did in 1784, as it has not been amended. See foot note 7, *Wooster v. Plymouth*, 62 N.H. 193, 200 (1882)
150. Part II, article 100, establishes the due process required by the Constitution of New Hampshire in which it may be amended, therefore, preserving the mandate in Part I, art. 1, and art. 12 that all government of right originates from the people and is founded in their consent.
151. "*A Law repugnant to the Constitution is void.*" Marbury v. Madison, 5 U.S. 137 (1803)

152. Where rights secured by the Constitution are involved, there can be no rulemaking or legislation which would abrogate them. *Miranda v. Arizona*, 384 U.S. 436 (1966)
153. The Plaintiff claims that said statutory enactments “NH RSA 21:6”, “NH RSA 21:6-a”, and “NH RSA 654:1. NH RSA 654:13 and NH RSA 656:40, NH RSA Chapter 657,” are all a violation of the substantive and procedural Due Process required to amend the Constitution, as such due process is protected by the laws of land cited above. Such legislative enactments have changed or altered the constitutional definitions of Part I, art. 11, Part II, art. 30 and art. 32 by statute, that which requires an amendment. Such legislative actions are a direct violation of the due process required to amend the Constitution of New Hampshire as required by Part II, article 100, and the 14th amendment. Said statutory changes have never been submitted to the inhabitants for their consent as required by Part I, art. 1.
154. The Plaintiff is now deprived of the following constitutional rights and continues to suffer irreparable psychological and emotional pain, resulting in physical pain. The Plaintiff is further injured by the cost, and the time and labor necessary to fight the unconstitutional encroachments upon his rights, which the Defendants swore an oath to protect. Said injuries include:
- a. Deprivation of substantive and procedural due process of law
 - b. Abolishing all effective means of redress of grievances
 - c. Alterations to the voter qualifications required by the Constitution without the consent of the inhabitants
 - d. changes to our statutory voting laws
 - e. changes to our laws
 - f. changes to our form of government
 - g. changes to our representation at the State and Federal level
 - h. changes to our taxes

Criminal Complaint

155. I adopt all of the preceding paragraphs and incorporate them by reference, as if fully set forth herein.
156. The Plaintiff did give lawful notice, and service upon the Defendants, for trespass upon Plaintiffs constitutional rights detailed in this claim. Said notices are as follows
157. May 20, 2019, the Plaintiff filed a Remonstrance with the office of the Secretary of State, the office Governor, the Clerk of the Senate, and the Clerk of the House of Representatives, protesting statutory changes to mandatory Constitutional voting laws.
158. On February 24, 2022 a Remonstrance was filed with the office of the Secretary of State, the office Governor, the office of the Attorney General, the Clerk of the Senate, and the Clerk of the House of Representatives, protesting statutory changes to mandatory Constitutional voting laws, protesting the unconstitutional use of electronic voting machines.
159. Attorney John Formella was Governor Sununu was the personal Attorney at the time of the filing of the first Remonstrance on May 20, 2019. Therefore, both Governor Sununu and A.G. Formella have prior knowledge of the substance of the Remonstrance, and notice of trespass.
160. Governor Sununu of the “state” of New Hampshire and the “state” legislative bodies of 2016-2018 and the “state” legislative body of 2018-2020 knowing that they were not licensed or privileged to do so, did enact by legislative fiat and governor Sununu did sign HB 1264 (2018) into law (amending N.H. RSA 21:6, and RSA 21:6-a).

HB 1266 (2020) amended the excuses for absentee voting, changing the voter qualification requirements of the Constitution of New Hampshire and the Federal

Constitution five months before an election by enacting statutes that are repugnant and contrary to the Constitutions.

161. HB 1266 was justified by the Emergency declaration Christopher Sununu, acting under color of law, has used the repeated citation of his Executive and Emergency orders to continue and unlimited renewal of emergency management powers (hereafter referred to as EMP) as such are repeated encroachments by the Governor on the Plaintiff's rights, and has caused a constitutional crisis now before this court as detailed in this complaint, as such continued renewal has been used to justify the following state actions separate from the stated purpose of the emergency orders.
162. Christopher T. Sununu, having knowledge that he had no authority to do so, did in fact conspire with others to alter the voting qualifications of the Constitutions, the State and Federal, in direct violation of his oath, and he did violate the due process required to amend the Constitution of New Hampshire without the consent of the Inhabitants as required by the Constitution of New Hampshire Bill of Rights, Part I, art. 1, art. 12, and Part II, Art. 100.
163. Whereas, Christopher T. Sununu, knowing he had no authority to do so, did in fact conspire with others, by sanctioning the 2018 and 2020 elections in direct violation of the aforesaid constitutional articles, and therefore the Plaintiff requests the Court declare said elections void for fraud as such actions our Malfeasance of office, and such actions are repugnant and contrary to the Constitutions State and Federal.
164. The Attorneys for Speaker Sherman Packard, and President Chuck testified on their behalf, at trial in the Merrimack County Superior Court case # 217-2021-CV-00178 in 2021 and before the New Hampshire Supreme Court case # 2021-0325, in 2022, that they possess the discretion to ignore constitutional voting laws they swore an oath to uphold and defend. They acknowledged in open court to

depriving the Plaintiff of his constitutional rights, and the Plaintiff further complains that they conspired to do so.

165. The Defendants, knowing that they were not licensed or privileged to do so, did grant the rights of suffrage to unqualified resident aliens, after a lawful notice by the Plaintiff, by way of remonstrance and notice of trespass upon the Plaintiff's constitutional protected rights.

166. The Defendants, knowing that they were not licensed or privileged to do so, did authorize the continued use of unconstitutional electronic voting machines, after a lawful notice by the Plaintiff, by way of remonstrance and notice of trespass upon the Plaintiff's constitutional protected rights.

167. The Defendants, knowing that they were not licensed or privileged to do so, did sanction the unconstitutional counting of absentee ballots, by allowing absentee exceptions not provided for by the Constitution of N.H.

168. All acts claimed of in this complaint are incorporated into this. That the Defendants' actions have deprived the Plaintiff of the protection of the laws, as required by the Bill of Rights, Part I, art. 14. and art. 15.

169. The Plaintiff charges that the Defendants, knowing that they were not licensed or privileged to trespass upon the Plaintiff's constitutional rights as stated in this complaint, did violate Title 643: ABUSE OF OFFICE: Section 643:1 Official Oppression, of the criminal code.

170. The Plaintiff further charges that such aforesaid actions by the Defendants violated the due process protection and the equal protection clauses of the 14th Amendment, and 18 U.S. Code § 241 Conspiracy against rights and 18 U.S. Code § 242, deprivation of Rights under the Color of Law.

Relief Sought

1. The Plaintiffs seeks relief from the physical, phycological trauma, and public embarrassment experienced from the Defendants continued violation described

here with regard to their intentional failures to provide relief to allow his vote to count.

2. Plaintiff Demands a Trial by Jury.
3. The Plaintiff seeks injunctive relief restraining the Defendants from exclusively using electronic means of vote counting in place of the requirements of Part II, art. 32.
4. The Plaintiff seeks injunctive relief restraining the Defendants from ignoring the hand counting required by N.H. Constitution, should electronic vote counting continue.
5. The Plaintiff seeks to enjoin the Defendants from using electronic open-source voting machines.
6. The Plaintiff seeks injunctive relief restraining the Defendants from entering any contractual agreements used for voting without legislative approval of the body of the whole.

Count I

7. The Plaintiff seeks injunctive or declaratory relief enjoining the Town Defendants from prohibiting the Plaintiffs right to vote in accordance with the teaching of the Constitution of N.H. – requiring my vote to be hand counted.

Count II

8. The Plaintiff seeks a declaratory judgement striking down N.H. RSA 656:40, N.H. RSA 656:41, RSA 656:42, declaring the legislatures statutory authorization of electronic voting machines unconstitutional, and be voided for being repugnant and contrary to the Constitution.

Count III

9. The Defendants do not possess and they have not established any independently recognized testing procedures or authorities to determine the functional validity of changes or modification made to electronic voting machines. The Plaintiff seeks to strike down N.H. RSA 656:40, N.H. RSA 656:41, N.H. RSA: 656:42, in as much

as the Plaintiff seeks declaratory and injunctive relief, prohibiting the use of Dominion/Di bold voting machines as currently used and described. Until and unless a professionally recognized standards are devolved and implemented to protect any and all changes of previously listed and label electronic equipment. Until such lawful standards are implement, the Defendants must be enjoined from using such questionable electronic equipment.

Count IV

10. The Plaintiff seeks a declaratory and injunctive relief striking down N.H. RSA 21:6, RSA 21:6-a, RSA 654:1, declaring that said statutory authorization of comingling the word resident and inhabitant to mean the same thing, redefining the definition of a qualified voter by statute. The Plaintiff seeks an acknowledgment of the differences.
11. The Plaintiff seeks a declaratory judgement from the Court, that use of the word resident within the statutes, grants the right of suffrage to resident aliens be declared unconstitutional in direct violation of Part I, art. 1, art. 2, art. 11, art. 14, art. 15, and Part II, art.30.

Claim V

12. The Plaintiff seeks a declaratory and injunctive relief striking down N.H. RSA Chapter 657, and declaring said statutory authorization for expanding the exemptions for absentee voting by statute, be declared unconstitutional, thereby suspending or declaring such as being repugnant and contrary to Part I, art. 1, art. 2, art. 11, art. 12, art. 14, art. 15.

Claim VI

13. The Plaintiff seeks a declaratory judgement striking down the effects of the 1976 amendments resulting from the outcome of Question 8 of the 1976 Voters Guide, declaring said question 8, be declared un-constitutional, thereby suspending or

declaring such as being repugnant and contrary to, Part I, art.1, art. 11, art. 12, art. 14, art. 15, Part II, art. 100

14. And any other relief this court find just and Proper.

VERIFICATION

I, Daniel Richard, swear under pains and penalties that foregoing is true and accurate to the best of my knowledge and belief.

/s/ Daniel Richard

Daniel Richard

CERTIFICATION OF SERVICE

I Daniel Richard hereby swear that on November 23, 2022, I did e-mail or hand deliver a copy of this complaint to the Defendants.

Dated August 22, 2022

/s/ Daniel Richard

Daniel Richard