

DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO

1437 Bannock St.
Denver, CO 80203

DATE FILED: October 30, 2023 8:22 AM

Petitioners:

NORMA ANDERSON, MICHELLE PRIOLA,
CLAUDINE CMARADA, KRISTA KAUFER,
KATHI WRIGHT, and CHRISTOPHER
CASTILIAN,

v.

Respondents:

JENA GRISWOLD, in her official capacity as
Colorado Secretary of State, and
DONALD J. TRUMP,

and

Intervenor:

COLORADO REPUBLICAN STATE CENTRAL
COMMITTEE, and DONALD J. TRUMP.

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Attorneys for Petitioners:

Mario Nicolais, Atty. Reg. # 38589
KBN Law, LLC

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Martha M. Tierney, Atty. Reg. # 27521
Tierney Lawrence Stiles LLC

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Eric Olson, Atty. Reg. # 36414
Sean Grimsley, Atty. Reg. # 36422
Jason Murray, Atty. Reg. # 43652
Olson Grimsley Kawanabe Hinchcliff & Murray LLC

[REDACTED]

Case Number: 2023CV032577

Division/Courtroom: 209

[REDACTED]

Donald Sherman
Nikhel Sus
Jonathan Maier
Citizens for Responsibility and Ethics in Washington

[REDACTED]

JOINT STIPULATED FACTS

The Parties stipulate to the following facts:

1. Petitioner Norma Anderson is a registered voter affiliated with the Republican Party who resides in Colorado.
2. Petitioner Michelle Priola is a registered voter affiliated with the Republican Party who resides in Colorado.
3. Petitioner Claudine Cmarada is a registered voter affiliated with the Republican Party who resides in Colorado.
4. Petitioner Krista Kafer is a registered voter affiliated with the Republican Party who resides in Colorado.
5. Petitioner Kathi Wright is a registered voter unaffiliated with any political party who resides in Colorado.
6. Petitioner Christoper Castilian is a registered voter unaffiliated with any political party who resides in Colorado.
7. Respondent Jena Griswold is Colorado's Secretary of State.
8. Intervenor Donald J. Trump was the 45th President of the United States. He served in that office from January 20, 2017, to January 20, 2021.
9. On January 20, 2017, Donald J. Trump took the following oath of office: "I, Donald John Trump, do solemnly swear that I will faithfully execute the office of President of the

United States, and will, to the best of my ability, preserve, protect, and defend the Constitution of the United States so help me God.”

10. Trump was a candidate for re-election in the 2020 Presidential Election.
11. The 2020 Presidential Election occurred on November 3, 2020.
12. The Electoral College met on December 14th, 2020, to cast their votes in the 2020 Presidential Election. The certified electors voted as follows: 306 for Joe Biden and 232 for Donald Trump.
13. The Electoral College votes certified on December 14th, 2020, were submitted to Congress.
14. The joint session of Congress convened on January 6, 2021, at or around 1:00 pm, to count the electoral votes. The Senate recessed at 2:13 p.m. and reconvened at 8:06 p.m. The House recessed at 2:29 p.m. and reconvened at 9:02 p.m.
15. In the early morning hours of January 7, 2021, Congress certified the Electoral College votes that had been submitted to it.
16. On November 15, 2022, Trump publicly announced his 2024 presidential campaign.
17. On October 11, 2023, Respondent Jena Griswold received a notarized statement of intent from Intervenor Trump to appear on the presidential primary ballot, along with the required filing fee and the Colorado Republican Party’s approval of his candidacy.

Date: October 30, 2023

Respectfully submitted,

/s/ Jason Murray

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Citizens for Responsibility and Ethics in Washington

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Counsel for Petitioners

CERTIFICATE OF SERVICE

I served this document on October 30, 2023, by Colorado Courts E-filing and/or via electronic mail upon all parties and their counsel:

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