

STATE OF MAINE
CUMBERLAND, ss.

SUPERIOR COURT
CIVIL ACTION
NO. PORSC-AP-2026-10

JANE GILBERT; MARK SAYRE;
and KAITLIN WEBBER

Petitioners,

v.

SHENNA BELLOWS, in her official
capacity as Maine Secretary of State

Respondent,

PROTECT GIRLS SPORTS IN
MAINE, a registered Ballot Question
Committee,

Intervenor.

DECISION AND ORDER

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INTRODUCTION

Petitioners Jane Gilbert, Mark Sayre, and Kaitlin Webber (“Petitioners”) have filed an action pursuant to 21-A M.R.S.A. § 905 and M.R. Civ. P. 80C appealing Secretary of State Shenna Bellows’ Determination of the Validity of a Petition for Initiated Legislation, dated March 17, 2026. In her decision, the Secretary of State (the “Secretary”) found that the citizen initiative petition at issue—known as “An Act to Designate School Sports Participation and Facilities by Sex”—was valid and supported by a sufficient number of valid signatures. Specifically, the Secretary found that the proponents of the Ballot Initiative submitted 71,033 valid signatures, which is 3,351 signatures above the 67,682 threshold.

On appeal, Petitioners argue that a host of errors and improprieties in the signature gathering process require invalidating many thousands of signatures, bringing the Ballot Initiative below the threshold for inclusion on the November 2026 ballot. Among the errors alleged, Petitioners contend that the Secretary validated hundreds and possibly thousands of signatures collected by circulators who did not personally witness all signatures on their forms and who thus submitted false oaths and affidavits, as well as validated forged signatures obtained by circulators suspected of fraudulent collection. For relief, Petitioners ask the court to remand the matter to the Secretary for invalidation of the challenged signatures or to directly reverse the Secretary's decision.

By statute, the court is required to decide this appeal "before the 40th day after the decision of the Secretary of State." 21-A M.R.S. § 905(2). The court has reviewed the record as well as the briefing submitted by Petitioners, the Secretary, and Intervenor Protect Girls Sports in Maine ("PGS"). This matter is in order for decision.

BACKGROUND

On September 19, 2025, Leyland John Strieff filed an application with the Secretary to circulate a petition for a citizens' initiative that came to be known as "An Act to Designate School Sports Participation and Facilities by Sex." On November 3, 2025, the Secretary issued to him an approved form for circulation. PGS' volunteers as well as hired individuals who solicited signatures for the petition—i.e., the circulators—prepared "circulator affidavits" to be submitted to the Secretary along

with other petition materials.

On February 2, 2026, PGS submitted to the Secretary 8,067 petitions, which the Secretary then proceeded to review. On March 17, 2026, the Secretary issued her Determination of the Validity of the Petition for Initiated Legislation. In her written Determination, the Secretary invalidated 8,659 signatures. The Secretary nevertheless found 71,033 valid signatures, a total that exceeded the constitutional threshold by 3,351. *See* Me. Const. art. IV, pt.3 §18(2). Accordingly, the Secretary found the petition to be valid. On March 27, 2026, Petitioners appealed the Secretary's decision pursuant to 21-A M.R.S. § 905 and M.R. Civ. P. 80C.

Pursuant to the statutory timeframe, the Secretary filed an administrative record exceeding 32,000 pages on April 6, 2026, which included the petition forms, circulator affidavits, and prior complaints regarding circulator misconduct reviewed by the Secretary. On April 8, 2026, Petitioner moved to supplement the record with 10 additional affidavits and attachments and further filed their merits brief on April 10, 2026. On April 17, 2026, both the Secretary and Intervenors filed their respective merits briefs and responses to Petitioners' motion to supplement the record. On April 22, 2026, Petitioners filed their reply brief.

LEGAL FRAMEWORK

The court's discussion must begin with recognizing the various constitutional rights and principles implicated in this case. The Maine Constitution grants Maine people the right to legislate by direct initiative. Me. Const. art IV, pt. 3, § 18. The Law Court has stressed the importance of such a right, declaring "the

right of the people to initiate and seek to enact legislation [to be] an absolute right.” *McGee v. Sec’y of State*, 2006 ME 50, ¶ 21, 896 A.2d 933. “[A]lthough the Legislature has the authority to enact laws providing for the implementation of the initiative right, any legislative implementation must respect the substance of the constitutional right.” *Id.* ¶ 20; Me. Const. art IV, pt. 3, § 22. The right cannot be abridged either directly or indirectly by governmental action. *McGee*, 2006 ME 50, ¶ 21, 896 A.2d 933. Accordingly, laws governing the direct initiative process “must be liberally construed to facilitate, rather than handicap, the people’s exercise of their sovereign power to legislate.” *Allen v. Quinn*, 459 A.2d 1098, 1102-03 (Me. 1983).

The Law Court has also recognized that “[t]he circulation of direct initiative petitions is ‘core political speech,’ and any state regulation of the initiative process must be ‘narrowly tailored’ to carry out a compelling state purpose.” *Me. Taxpayers Action Network v. Sec’y of State*, 2002 ME 64, ¶ 8, 795 A.2d 75. Laws governing the initiative process should therefore be construed in a way that avoids imposing an impermissible burden on protected speech. *See id.*; *see also State v. Cropley*, 544 A.2d 302, 304 (Me. 1988).

Moreover, under the Maine Constitution, “[t]he Secretary of State is the constitutional officer entrusted with administering—and having expertise in—the laws pertaining to the direct initiative process.” *Reed v. Sec’y of State*, 2020 ME 57, ¶ 18, 232 A.3d 202. The Secretary has been granted plenary power to investigate and determine the validity of petitions. *Me. Taxpayers Action Network*, 2002 ME 64, ¶ 12 n.8, 795 A.2d 75. When assessing the Secretary’s determination of initiative

petitions, the Court's review must be deferential and limited, keeping in mind the Secretary's "broad[] authority" in the context of evaluating referendum petitions. *Knutson v. Dep't of Sec'y of State*, 2008 ME 124, ¶ 20 n.7, 954 A.2d 1054; *Passadumkeag Mountain Friends v. Bd. of Env'tl. Prot.*, 2014 ME 116, ¶ 12, 102 A.3d 1181.

By statute, an action seeking review of the Secretary's decision on a direct initiative petition "must be conducted in accordance with the Maine Rules of Civil Procedure, Rule 80C, except as modified by this section." 21-A M.R.S. § 905(2). In *Palesky v. Sec'y of State*, the Law Court held that "[t]he provisions of section 905 that could be deemed 'modifications' of Rule 80C relate to the expedited timing of the appeal." 1998 ME 103, ¶ 5, 711 A.2d 129. The *Palesky* court further concluded that 21-A M.R.S. § 905 does not require "a full de novo trial"; rather, the procedural framework for a Section 905 appeal is set forth in Rule 80C. *Id.* ¶¶ 5-6, 8. Under Rule 80C, the court is not permitted to overturn an agency's decision "unless it: violates the Constitution or statutes; exceeds the agency's authority; is procedurally unlawful; is arbitrary or capricious; constitutes an abuse of discretion; is affected by bias or error of law; or is unsupported by the evidence in the record." *Kroger v. Dep't of Env'tl. Prot.*, 2005 ME 50, ¶ 7, 870 A.2d 566; 5 M.R.S. § 11007(4). The party seeking to vacate a state agency decision has the burden of persuasion on appeal. *Anderson v. Me. Pub. Emp. Ret. Sys.*, 2009 ME 134, ¶ 3, 985 A.2d 501.

When reviewing agency decisions, the court must examine “the entire record to determine whether, on the basis of all the testimony and exhibits before it, the agency could fairly and reasonably find the facts as it did.” *Friends of Lincoln Lake v. Bd. of Envtl. Prot.*, 2010 ME 18, ¶ 13, 989 A.2d 1128. The court may not substitute its judgment for that of the agency on questions of fact. 5 M.R.S. § 11007(3). The issue is not whether the court would have reached the same result the agency did, but whether the “record contains competent and substantial evidence that supports the result reached” by the agency. *Seider v. Bd. of Examiners of Psychologists*, 2000 ME 206, ¶ 8, 762 A.2d 551.

To the extent this case requires statutory interpretation, the court “interpret[s] every statute de novo as a matter of law to give effect to the intent of the Legislature, first by examining its plain language.” *Reed*, 2020 ME 57, ¶ 14, 232 A.3d 202 (quotation marks omitted). If the plain language is unambiguous, the court interprets the statute according to its unambiguous meaning. *Id.* “If, however, a statute is ambiguous—i.e., it is reasonably susceptible to different interpretations—[the court] defer[s] to the agency's reasonable construction when the agency is tasked with administering the statute and it falls within the agency's expertise.” *Id.* (quotation marks omitted). As the Secretary is the constitutional officer with plenary power to determine the validity of petitions, the court will defer to the Secretary’s “reasonable interpretation of [an] ambiguous statute[].” *Id.* ¶ 18.

DISCUSSION

On appeal, Petitioners assert 21 challenges to the Secretary's decision, as well as move the court to take additional evidence to supplement the record. The court addresses Petitioners' Motion and each challenge in turn.

I. Motion to Take Additional Evidence

Petitioners move this court to take additional evidence to supplement the administrative record provided by the Secretary. The supplemental evidence consists of ten affidavits providing eyewitness testimony of fraudulent misconduct accompanied by photographs and videos and are marked as Exhibits A-J attached to this Motion. Additionally, Petitioners seek to admit the Central Voter Registration System (CVR) into the agency record.

Under the Administrative Procedure Act, "judicial review shall be confined to the record upon which the agency decision was based." 5 M.R.S.A. § 11006(1); *see* M.R.Civ. P. 80C(e). However, § 11006(1)(B) provides:

The reviewing court may order the taking of additional evidence before the agency if it finds that additional evidence, including evidence concerning alleged unconstitutional takings of property, is necessary to deciding the petition for review; or if application is made to the reviewing court for leave to present additional evidence, and it is shown that the additional evidence is material to the issues presented in the review, and could not have been presented or was erroneously disallowed in proceedings before the agency. After taking the additional evidence, the agency may modify its findings and decisions, and shall file with the court, to become part of the record for review, the additional evidence and any new findings or decision.

5 M.R.S.A. § 11006(1)(B). Petitioners argue the additional evidence is material evidence of circulator misconduct that was not available to Petitioners until after municipal officials and the Secretary validated the signatures, notwithstanding the

complaints of such misconduct received by the Secretary before her Determination. Pet. Mot. 5. Because Exhibits A-J and their attachments present evidence suggesting that some circulators may have falsely sworn to witnessing all the signatures collected on their petition forms, the court finds the evidence of fraud material to the issue presented for review, specifically relevant to Challenges 2 and 19 discussed below. While this information was previously brought to the attention of the Secretary before her Determination, the court finds Petitioners could not have presented the full extent of such allegations of circulator fraudulent misconduct until after the validated signatures and petition sheets were made publicly available. *Palesky v. Sec'y of State*, 1998 ME 103, ¶ 14, 711 A.2d 129 (affirming court's remand to the Secretary of State after proof of "newly discovered evidence of fraud."). However, the court declines to order the addition of the CVR as the court finds it is not necessary to reviewing the petition validation procedures conducted by the Secretary, a procedure in which a cross-check of the municipal registrars' verification of petition signers through the use of the CVR is not required.

Therefore, the court grants in part and denies in part Petitioners' motion to take additional evidence by remanding to the Secretary to consider the proffered evidence—Exhibits A through J together with their Attachments—and find additional facts.

II. Challenges 2 and 19: Allegations of Fraudulent Misconduct

Petitioners allege fraudulent misconduct by circulators and argue for the invalidation of signatures collected by circulators who falsely swore to personally

witnessing all signatures collected on their petition sheets (Challenge 2), and relatedly, invalidation of signatures that are potential forgeries or collected through fraudulent means (Challenge 19). The Secretary accepts that supplemental information provided by Petitioners, discussed *supra*, suggests that further investigation into such claims may be warranted. Resp't's Br. at 35-38. Given that Challenge 2 implicates over 1,300 validated signatures and Challenge 19 implicates two circulators responsible for 1,700 signatures in total, the court finds Challenges 2 and 19 potentially outcome-determinative, as the court recognizes these two challenges call into question "the integrity of the initiative and referendum process" and could prove fatal to the petition. *Me. Taxpayers Action Network*, 2002 ME 64, ¶ 13, 795 A.2d 75 (integrity of the initiative "in many ways hinges on the trustworthiness and veracity of the circulator.").

The court remands to the Secretary to consider the proffered evidence, find additional facts, and determine based on those facts whether any additional signatures should be invalidated.

III. Challenge 1: Registration Issue Waived

Petitioners argue the petition organizations behind the Ballot Initiative violated Maine law by failing to properly register with the Secretary and failing to properly disclose circulator compensation, as required by 21 M.R.S.A. § 903-C. Under the statute, a petition organization must register with the Secretary and complete a form that includes the ballot question title, contact information for the organization, the name and signature of a designated agent, and a list of circulators indicting the

method by which the circulators were being compensated. 21 M.R.S.A. § 903-C(1). This registration statement is required “in addition to meeting any other requirement to transact business in this State.” *Id.* Petitioners ask this court to find all four petition organizations failed to properly register, thereby invalidating over 50,000 of the 79,692 signatures submitted to the Secretary.

The court does not reach Petitioners’ challenge to the registration paperwork because the court finds Petitioners waived the issue by failing to assert Challenge 1 in the petition for review. 5 M.R.S.A. § 11002(2). As Petitioners correctly state, the petition for review expressly notes the obligation of petition organizations to properly register with the Secretary, which must occur “prior to circulating any petitions for an initiative.” Pet. ¶ 27. Such registration paperwork, or lack thereof, should have been available online to Petitioners and the public, even if the context or strength of the challenge was developed by the production of the administrative record after the filing of the petition. The petition does not otherwise advance any challenge to the organizations’ registration documents and the court does not find such an omission to be merely a technicality of the pleading. Therefore, the court finds Petitioners’ Challenge 1 waived for failure to raise the challenge in the petition for review.¹

¹ Separately, the court notes the significance of Mainers’ rights to directly initiate legislation and agrees with the Secretary that “given the lack of notice, instruction, or prior enforcement, and the weighty speech and associational interests at stake, invalidation of tens of thousands of petition signatures may not be an appropriate remedy in the context of this specific case—even if it might be in future cases if the Secretary develops such procedures and instructions.” Resp’ts Br. at 11.

IV. Challenges 3, 6, 12-17: Secretary Concessions

For numerous challenges raised by Petitioners, the Secretary wholly concedes error in not invalidating those challenged signatures. Under the court's deferential and limited review of the Secretary's determination, the court accepts such concessions. *Knutson v. Dep't of Sec'y of State*, 2008 ME 124, ¶ 20 n.7, 954 A.2d 1054 (Secretary's broad authority in the context of evaluating referendum petitions). As outlined below, the court remands such issues to the Secretary to act in compliance with her concessions and invalidate the challenged signatures:

- **Challenge 3:** four circulators listed out-of-state addresses on their circulator affidavits but failed to consent to personal jurisdiction of Maine. The Secretary concedes 1,520 signatures collected by such circulators should have been invalidated.
- **Challenge 6:** two circulators notarized petition forms after they circulated petitions. The Secretary concedes petition forms notarized by such individuals (*De Clercq* after November 14, 2025 and *Harrington* after November 30, 2025) should have been invalidated.
- **Challenge 13:** seven petition forms containing the notarial certificate lacked the notary's signature. The Secretary concedes the 14 total impacted signatures should have been invalidated.
- **Challenge 17:** certain signers failed to write a date and instead used ditto marks to indicate the same date as the previous signer. The Secretary concedes that 37 signatures should have been invalidated.

Additionally, the Secretary partially concedes error in not invalidating further signatures challenged by Petitioners. The court finds the Secretary's partial concessions to be supported by competent and substantial evidence in the record. See *Secretary of State's Tables 14-16*. Further, pursuant to the deferential standard, the court finds no error of law, findings not supported by the evidence, or an abuse of

discretion in the Secretary's determination that some of the challenged signatures remain valid. *Caiazzo v. Sec'y of State*, 2021 ME 42, ¶ 16, 256 A.3d 260. As "the Secretary of State is the constitutional officer entrusted with administering—and having expertise in—the laws pertaining to the direct initiative process," the court must defer to the Secretary's reasonable interpretation of statutes and findings of fact supported by competent record evidence. *Reed v. Sec'y of State*, 2020 ME 57, ¶ 18, 232 A.3d 202. The court remands the issue to the Secretary to act in compliance with the identified concessions as set forth below:

- **Challenge 9:** the Secretary concedes that 5 out of the 7 challenged circulator affidavits should have been invalidated for date discrepancies between the circulator signature date and the notary certificate date.
- **Challenge 12:** the Secretary concedes that Petitioners correctly identified 275 signatures—out of 286 challenged—that were additional duplicate signatures not identified by Election staff.
- **Challenge 14:** the Secretary concedes that 14 signatures—out of 373 challenged—contain a signatory date after the circulator's oath and lack sufficient context to confirm the date was merely a typographical error.
- **Challenge 15:** the Secretary concedes that 4 signatures—out of 47 challenged—contain no date and lack sufficient context to confirm the signature was made prior to the circulator's oath.
- **Challenge 16:** the Secretary concedes that 80 signatures—out of 307 challenged—are dated before the petition was circulated and lack sufficient context to confirm the date was merely a typographical error.

V. Challenges 4, 5, 7, 8, 10, 11, 18, 20, 21: Secretary Discretion

Petitioners raise numerous other challenges that the Secretary contends, and the court agrees, fail as a matter of law. For many of the challenges discussed below, the court finds Petitioners failed to demonstrate that the Secretary's findings are not

supported by competent evidence. Petitioners carry the burden on appeal to demonstrate no competent evidence supports the Secretary's determination. *Seider v. Bd. of Examiners of Psychologists*, 2000 ME 206, ¶ 9, 762 A.2d 551.

In **Challenge 4**, Petitioners argue all signatures collected by a circulator named "Cairo" should be invalidated on the basis that her circulator affidavit fails to include the circulator's full name as statutorily required. Pet. Br. at 20; *see* 21-A M.R.S.A. § 903-A(4)(A). The Secretary argues, absent affirmative evidence to the contrary, the court cannot properly conclude that Cairo is not the circulator's full name. Resp't's Br. at 13. In fact, Intervenors attach Exhibit 1, an affidavit executed by Cairo, which presents that Cairo is in fact her full legal name. Because the court finds the Cairo's circulator affidavit contains, as required, "the circulator's printed name," the court finds that Challenge 4 fails as a matter of law.

In **Challenge 5**, Petitioners identify two individuals, Robert De Clercq and Patrick Harrington, who performed services for the direct initiative campaign in the form of circulating petitions *and* later notarized circulator affidavits. Pet. Br. at 20-23. Because the individuals served "dual circulator-notary" roles, Petitioners argue the notarial acts are "void" and the circulators "never lawfully qualified as circulators and their petition sheets must be invalidated." *Id.* at 21. While Petitioners point to *Reed v. Sec'y of State* for support, the Secretary distinguishes the Court's decision in *Reed* from the issue raised in Challenge 5.² 2020 ME 57, 232 A.3d 202.

² As the Secretary notes, and as discussed by the court *supra*, Challenge 6 is implicated by *Reed* and the Secretary concedes error by not invalidating De Clercq and Harrington's notarization of circulator oaths after acting as circulators.

Pursuant to 21-A M.R.S.A. § 903-E(1), notaries and other notarial officers are prohibited from “administer[ing] an oath or affirmation to the circulator of a petition under section 902” if that notary is providing any other services to initiate or promote “the direct initiative or people’s vote referendum for which the petition is being circulated.” In *Reed*, the Court upheld the Secretary’s interpretation of § 903-E(1) as allowing for petition forms to be voided if the notary who notarized the circulator’s oath on the petition had previously acted as a circulator. *Reed*, 2020 ME 57, ¶ 19, 232 A.3d 202. Here, the Secretary argues that the statutory restriction upheld by *Reed* does not implicate Petitioners’ challenge regarding circulator *affidavits* (rather than *oaths* contained on the petition forms) and thus the notarial conflict-of-interest rule does not extend to circulator affidavits. Resp’t’s Br. at 15. The court finds the Secretary’s interpretation of § 903-E(1) reasonable and finds that Challenge 5 fails as a matter of law.

In **Challenge 7**, Petitioners argue all signatures collected by Hope Angel should be invalidated on the basis that she deprived signers of the opportunity to read the contents of the petition as required by 21 M.R.S.A. § 901-A(1) and points to a sworn affidavit for support. *See* Exhibit F (“Madanes Aff.”) The Secretary contends that the proffered evidence—the affidavit’s allegation that the circulator “fold[ed] the Petition on a clipboard in a manner that prevented signers from seeing the initiative summary” and a number of people signed the petition in that manner—fails to make a prima facie showing of circulator misconduct. Resp’t’s Br. at 16. And, even if there existed a prima facie case, the proper course of action for the court would be to remand

on the issue, as opposed to the invalidation of impacted signatures. *Id.* at 17. The court agrees on both counts. The court finds Petitioners have failed to demonstrate a prima facie violation of § 901-A(1) and finds Challenge 7 fails as a matter of law.

In Challenges 8, 10 and 11, Petitioners argue three issues in which circulators allegedly committed disqualifying affidavit errors. Pet. Br. at 22-24. In response, the Secretary argues that a lack of notarization date on a circulator affidavit is de minimis error not warranting invalidation of signatures (Challenge 8), an exact one-year discrepancy between the circulator signature and the notarial certificate date is merely typographical error (Challenge 10), and failure of an out-of-state notary to provide their commission number is not a proper basis to invalidate the circulator's signature (Challenge 11). Resp't's Br. at 17-19. The court finds the Secretary "could have fairly and reasonably found the facts as it did" when the Secretary determined that such errors in Challenge 8 are "not the sort of substantive defects that cast doubt on whether the oath was administered" and, in Challenge 10, such errors are "non-material defects in form" that do not warrant invalidation of all signatures. *See Friends of Lincoln Lake v. Bd. of Env'tl. Prot.*, 2010 ME 18, ¶ 13, 989 A. 2d 1128.

Moreover, the court agrees with the Secretary's contention that although the circulator affidavit form requests the Commission number for out-of-state notaries as a method to assist Election staff in the verification process, neither 21-A M.R.S.A. § 903-A(4) nor 4 M.R.S.A. § 1916(1) requires the inclusion of a Commission number. The court declines to find the Secretary committed any error of law, abuse of

discretion, or finding of fact not supported by the record when the Secretary found that the omissions or typographical errors presented in Challenges 8, 10, and 11 did not cast doubt on the circulators' or signatories' substantive compliance with the law. *Id.* ¶ 12. Thus, the court finds Petitioners have failed to carry their burden of persuasion regarding Challenges 8, 10, and 11.

In **Challenge 18**, Petitioners assert that at least 59 signatures should be invalidated because they do not appear to be from registered Maine voters, and requests that the court remand to the Secretary to review whether the 59 signatories Petitioners challenge are shown as registered voters according to the State's electronic central voter registration system (CVR). As the Secretary argues, the petition validation procedures as outlined by the Maine Constitution and Title 21-A place the responsibility for verifying whether petition signers are registered voters with municipal registrars, rather than the Secretary, and do not otherwise require the Secretary to use CVR to cross-check the registration status of every petition signer already verified by the municipal registrar. Resp't's Br. at 21. The court agrees that, as a matter of law, the Secretary "cannot commit reversible error in a petition validation decision by relying on municipal certification decisions" and accordingly, Petitioners' Challenge 18 fails. *Id.*

In **Challenges 20** and **21**, Petitioners seek to invalidate hundreds of signatures for failure of the signer to include their complete street address (Challenge 20) or their municipality (Challenge 21). As Petitioners note, 21 M.R.S.A. § 902 provides that direct initiative petitions "must be signed in the same manner as are

nonparty nomination petitions under [21-A M.R.S.A. § 354(3) & (4)],” which in turn provides that “the voter or the circulator of the petition must write or print the voter’s residence address and municipality of registration.” § 354(4). The Secretary contends that the “longstanding interpretation of § 354(4) in the context of both direct initiatives and candidate petitions, dating back to at least the 1990s, is that a failure to provide a residential street address does not automatically invalidate a signature” nor does the failure to list the municipality invalidate a signature. Resp’t’s Br. at 24-25. The municipal registrars confirm that signatories are registered voters primarily by comparing the signatures on the petition to the signatures contained on the signer’s voter registration application, and a listed residential address and municipality provides further information to confirm the signatory is a registered voter.

The Secretary argues the court should defer to the Secretary’s reasonable interpretation as it allows registrars to certify signatures even in the absence of a residence address or municipality, thereby effectuating the purpose of the statute. The court finds such an interpretation “facilitate[s], rather than handicap[s], the people’s exercise of their sovereign power to legislate.” *Allen v. Quinn*, 459 A.2d 1098, 1102-03 (Me. 1983). Accordingly, the court finds Petitioners’ Challenges 20 and 21 fail.

CONCLUSION

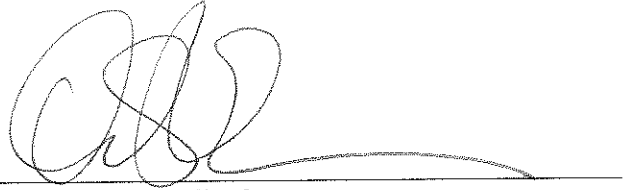
For the foregoing reasons, the entry is: this matter is REMANDED to the Secretary of State for further proceedings consistent with this Order, which may include correcting the concessions identified herein, taking new evidence, and developing further findings of fact as necessary. The

Secretary is ordered to issue a new Determination of Validity within 30 days of this Order.

The clerk is directed to incorporate this order into the docket by reference. M.R.

Civ. P. 79(a).

Dated: April 24, 2026



Deborah P. Cashman
Justice, Maine Superior Court

Entered on the Docket: 04/24/2026