

STATE OF MAINE
KENNEBEC, ss

SUPERIOR COURT
CIVIL ACTION
DOCKET NO. AP-24-01

DONALD J. TRUMP,

Petitioner,

v.

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

Respondent,

**KIMBERLEY ROSEN, THOMAS
SAVIELLO, and ETHAN STRIMLING,**

Parties-in-Interest.

**MOTION TO SUPPLEMENT THE
RECORD
(Rule 80C(e))**

Petitioner President Donald J. Trump moves to supplement the record under to Rule 80C(e) for the reasons set forth below.

Maine Rule of Civil Procedure 80C(e) allows for the Superior Court to take additional evidence on motion within 10 days after the record of the proceedings is filed. Petitioner respectfully requests the Court to allow the admission of additional evidence, namely that (1) the Secretary had a personal and professional relationship with Challenger Ethan Strimling

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and (2) that the Secretary had a personal and professional relationship with Challenger Thomas Saviello.

The Secretary failed to disclose any of this information to the Petitioner, and Petitioner was not made aware of the additional evidence until after the hearing. As an offer of proof, Petitioner submits the following:

BACKGROUND

The Secretary held a hearing on December 15, 2023, and did not disclose to the parties that she had previously made public comments containing conclusions about the factual and legal matters that were the issues at the hearing and warning that history would look kindly at those who disagreed with her. R. 824-825. Similarly, the Secretary did not disclose that she had personal and professional relationships with the Challengers.

On December 27, 2023, President Trump submitted his *Request to Disqualify the Secretary of State*, arguing that the Secretary “has already concluded that President Trump engaged in insurrection – a determination that she made well before the submission of evidence or argument in this current matter” and that “[b]ecause the Secretary has exhibited a personal bias in this matter, she should disqualify herself from further proceedings.” R. 818.

Recently, it was brought to President Trump’s attention that the Secretary not only had pre-determined the outcome of this case, but that she also had undisclosed relationships with two of the Challengers.

Challenger Ethan Strimling

Challenger Ethan Strimling (“Strimling”) is the President/CEO of a Maine non-profit

organization called LearningWorks.¹ Strimling identifies himself as he CEO of LearningWorks - his LinkedIn profile lists him as the “CEO at LearningWorks²”, his profile with Maine Magazine states that he is the CEO of Learning Works³, and until July 27, 2017, Strimling was listed as the “Noncommercial Registered Agent” of LearningWorks via the Secretary of State’s “Statement of Appointment or Change” form.⁴

On December 14, 2015, it was reported in the Portland Press Herald that the Secretary was hired to serve as the executive director of LearningWorks beginning December 16, 2015.⁵ Accordingly, this shows that Strimling and Bellows were both executives at the same company at the same time.

LearningWorks, as a non-profit organization, is required to file its tax return each year via IRS Form 990, which is called the “Return of Organization Exempt from Income Tax.” In 2015, LearningWorks filed Form 990, which not only listed the Secretary as an “interim exec.,”⁶ but also listed her on the very first page as a “principal officer;” on page 7 it further

¹ **Exhibit 1**, *Ethan Strimling*, Wikipedia (Last visited January 8, 2023, 11:56 AM), https://en.wikipedia.org/wiki/Ethan_Strimling.

² **Exhibit 2**, Screenshot of Strimling’s LinkedIn profile page (<https://www.linkedin.com/in/ethan-strimling-4a107625/>).

³ **Exhibit 3**, Screenshot of Strimling’s Biography at Maine Magazine (<https://www.themainemag.com/radio/radio-guests/ethan-strimling/>).

⁴ **Exhibit 4**, 07/27/2017 Statement of Appointment of Change for Noncommercial Registered Agent.

⁵ **Exhibit 5**, *Shenna Bellows to take temporary post as director of Learning Works*, Portland Press Herald (Dec. 15, 2015), <https://www.pressherald.com/2015/12/14/bellows-to-take-temporary-post-as-director-of-learning-works/>.

⁶ **Exhibit 6**, LearningWorks 2015 IRS Form 990, at 8.

lists Ethan Strimling as the CEO.

F Name and address of principal officer SHENNA BELLOWS 181 BRACKETT STREET PORTLAND, ME 04102

The following year, 2016, a different person was listed as “principal officer,” but again the Secretary was listed as an “interim exec.,” and in 2016, the Form 990 listed the Secretary as having earned \$69,543 for her work in that role.⁷

(13) SHENNA BELLOWS INTERIM EXEC	40 00			X				69,543
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Because the Secretary has a relationship with Strimling that she did not disclose prior to hearing a case he brought, this failure to disclose gives, at a minimum, the appearance of impropriety and should have been grounds for the Secretary to disqualify herself from hearing the case.

Challenger Thomas Saviello

Challenger Thomas Saviello (“Saviello”) also has a personal relationship with the Secretary. Indeed, Saviello gave an interview to CNN on January 2, 2024 where, when asked about Secretary Bellows, he admitted that “I know her very well personally.”⁸ While it is unclear how Saviello developed sufficient knowledge to claim to know the Secretary “very well personally,” his statement further contributes to the appearance of impropriety and

⁷ Exhibit 7, LearningWorks 2016 IRS Form 990, at 7.

⁸ Interview with CNN posted on X (formerly Twitter) at <https://twitter.com/TheMaineWire/status/1742176419470287047>.

provides an additional basis upon which the Secretary should have disqualified herself from rendering an opinion in this case.

This Court should accept President Trump's proffered information, for four reasons. First, Secretary Bellows' personal and professional relationships with two of the Challengers is highly relevant to one of President Trump's core assertions in this case – that the Secretary was a biased adjudicator who should have recused herself.

Second, due to the highly compressed timeframe of this matter, President Trump was unable to unearth this information regarding Ethan Strimling. Likewise, Mr. Saviello publicly admitted his relationship only after the conclusion of the hearing.

Third, Secretary Bellows failed to disclose these personal relationships, making it effectively impossible for President Trump to add this information to the record during the pendency of the hearing.

Fourth, Maine has a strong interest in ensuring the integrity of its proceedings, as well as maintaining public confidence in the fairness of its election. This is particularly important in this highly polarized and highly publicized presidential election. The citizens of Maine deserve to have confidence in the fairness of their elections, and that includes fair adjudication of challenges that determine who may – and who may not – appear on the ballot.

CONCLUSION

Petitioner respectfully requests the Court to allow the admission of Exhibits 1-7, and the CNN interview with Thomas Saviello, as additional evidence, to demonstrate that the

Secretary had personal and professional relationships with Challengers Strimling and Saviello that the Secretary should have disclosed.

Respectfully submitted this 8th day of January 2024.

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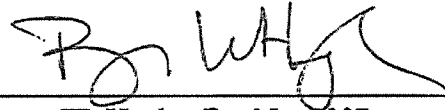
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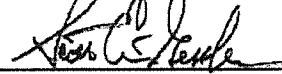
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