



January 2, 2024

Via Electronic Mail

Emily Cook
Maine Secretary of State
148 State House Station
Augusta, Maine 04333
emily.cook@maine.gov

Freedom of Access Act Request: Shenna Bellows' Election Interference

Dear Ms. Cook:

America First Legal Foundation is a national, nonprofit organization working to promote the rule of law in the United States, prevent executive overreach, and ensure due process and equal protection for all Americans, all to promote public knowledge and understanding of the law and individual rights guaranteed under the Constitution and laws of the United States. To that end, we file requests for public records with federal and State governments on issues of pressing concern, then disseminate the information we obtain, making documents broadly available to the public, scholars, and the media. Using our editorial skills to turn raw materials into distinct work, we distribute that work to a national audience through traditional and social media platforms. AFL has over 188,000 followers on X, and our Founder and President has over 560,000 followers on X.

I. Background

On December 28, 2023, the State of Maine Secretary of State, Shenna Bellows, issued a self-styled “decision” on three challenges to the nomination petition of Donald J. Trump for the Republican primary for President of the United States.¹ The first two challenges, one filed by Mary Ann Royal, and one filed by Kimberley Rosen, Thomas Saviello, and Ethan Strimling, contested Mr. Trump’s qualification for office under Section Three of the Fourteenth Amendment to the U.S. Constitution. The third challenge, filed by Paul Gordon, contested Mr. Trump’s qualification under the Twenty-Second Amendment. Apparently for the purpose of 2024 Presidential election

¹ See Secretary’s Ruling, In re Challenges of Rosen et al to Primary Nomination Petition of Donald J. Trump, Republican Candidate for President of the United States (Me. Dep’t of the Sec’y of State Dec. 28, 2023), <http://tinyurl.com/yvnbbez6>.

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interference, Ms. Bellows, a partisan Democrat party operative, “found” that the former President’s primary petition is invalid, ostensibly because “the declaration on his candidate consent form is false because he is not qualified to hold the office of the President under Section Three of the Fourteenth Amendment.”

Ms. Bellows’s course of conduct raises obvious questions of unlawful bias, taint, and prejudice. It also suggests the possibility of illegal coordination with leftist dark money entities funded by, *inter alia*, the Tides Foundation, that are engaged in efforts to undermine and prevent a fair and open 2024 Presidential election.² Notably, at least one of the entities that may be coordinating with Ms. Bellows has admitted to engaging in concerted efforts to undermine and overturn the 2016 Presidential election, and his organization Free Speech for People, has asked election officials in all 50 states to remove Trump from the ballot.³ Moreover, as intervenors in the case, Citizens for Responsibility and Ethics in Washington (“CREW”), represented the petitioners who sued to remove Trump from the Colorado Republican presidential primary ballot, and Ms. Bellows significantly relied on the arguments and evidence presented in that case.⁴

Accordingly, America First Legal requests the following records under Maine’s Freedom of Access Act, 1 M.R.S.A. §§ 400–14.

II. Requested Records

- A. All communications to or from Shenna Bellows containing the word “Trump.” You should search all her official and personal email and other messaging accounts. The time frame for this request is August 1, 2023, to December 30, 2023.
- B. All communications to or from Shenna Bellows containing the domain “eop.gov”. You should search all her official and personal email and other messaging accounts. The time frame for this request is August 1, 2023, to December 30, 2023.
- C. All communications to or from Shenna Bellows containing the domain “@freespeechforpeople.org”. You should search all her official and personal email and other messaging accounts. The time frame for this request is August 1, 2023, to December 30, 2023.
- D. All communications to or from Shenna Bellows containing the domain “@citizensforethics.org”. You should search all her official and personal

² FREE SPEECH FOR PEOPLE, 2022 END OF YEAR REPORT at 3 (Feb. 2023) (available at <http://tinyurl.com/mryxbwh2>).

³ Art Keene, *A Few Questions for John Bonifaz*, AMHERST INDEP. (July 19, 2019), <http://tinyurl.com/c3va226z>; Nicholas Bogel-Burroughs, *What to Know About the Efforts to Remove Donald Trump From the 2024 Ballot*, N.Y. TIMES (Dec. 29, 2023) <http://tinyurl.com/2de34ed2>.

⁴ See, e.g., Secretary’s Ruling at 17 n.11, 23, 31.

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III. Fee Waiver

Per 1 M.R.S.A. § 408-A(11)(B), America First Legal requests a fee waiver on the grounds that release of the requested public records is in the public interest because doing so is likely to contribute significantly to public understanding of the operations or activities of government and is not primarily in the commercial interest of the requester. Federal agencies such as the Departments of State, Defense, Education, Energy, Health and Human Services, Justice, Interior, and Homeland Security routinely grant America First Legal fee waivers. And, as a non-profit organization, America First Legal has no commercial interest in this request. If America First Legal's request for a fee waiver is not granted in full, please contact us immediately.

IV. Conclusion

To accelerate your release of responsive records, we welcome production on an agreed rolling basis. Please provide responsive records in an electronic format by email. Alternatively, please provide responsive records in native or PDF format on a USB drive to America First Legal Foundation, 611 Pennsylvania Ave SE #231, Washington, DC 20003.

Thank you in advance for your cooperation.

Sincerely,

/s/ Michael Ding
America First Legal Foundation