Commonwealth of Massachusetts
Superior Court

Suffolk, ss.

Michael Walsh

v. Docket No._____

State Ballot Law Commission, Adam Roof,
And Secretary William Galvin in his Official Capacity

Complaint for Judicial Review
And Declaratory and Other Relief

Now comes the Plaintiff, Michael Walsh, who makes complaint as follows:

1. Michael Walsh is a natural person, registered to vote, domiciled in Lynnfield, Massachusetts. He is an full-time practicing attorney with a substantial case load. He is a registered Republican. He is a candidate for the Republican Nomination for Attorney General for the September 1st State Primary election. He has previously been endorsed by the MassGOP's convention for the role.

2. Adam Roof is, apparently, a registered voter from Boston. He is registered as a Democrat. He is also, upon information and belief, the professional Executive Director of the Massachusetts Democratic Party.

3. The State Ballot Law Commission (SBLC) is a state commission organized under G. L. c. 55B, consisting of 5 gubernatorially appointed members including chair who must be a retired judge. The Commission members a removable at will by the Governor

4. William F. Galvin is the Secretary of the Commonwealth and the Chief Election Official of the state.

5. On or about June 1, 2026, Walsh and his campaign filed 10,723 certified signatures, contrary to the SBLC finding.

6. One way to qualify for the primary ballot is the submission of at least 10,000 certified signatures from Register Republican voters or unenrolled voters.

7. On or about June 3, 2026, Mr. Adam Roof filed an objection to Walsh's nomination papers, alleging every conceivable ground including forgery and fraud.

G. L. c. 55B s. 5 provided that a candidate whose papers are objected to must be notified by the Objector by certified mail return receipt or registered mail. It further provides that "Failure to do so shall invalidate any objection filed with the commission."

8. Mr. Roof filed a certificate of service swearing under the pains and penalties of perjury that he had in fact notified the other statutory parties, by first class mail, and notified Walsh by certified mail return receipt. Walsh later argued that this evinced an actual knowledge of the certified mail requirement.

9. It would later turn out that Mr. Roof did not do as he swore. Following Walsh's motion to dismiss on jurisdictional grounds (for service and for the form of the voter registration certificate) the Commission ordered Roof to respond to the Motion. Roof's submitted an affidavit from his deputy, Mr. Bausch, indicating that he had attempted but failed to send all of the envelopes by certified mail. He also indicated that, despite being a professional political operative at a major state political party, that he had never mailed anything certified mail before.

10. Roof also argued that Walsh had actual notice, in the form of regular first class mail and email. He argued that the statute was old and could not be read literally.

11. However the email was not sent read receipt requested. The objector had not way of confirming it was ever delivered. Emails, even business ones, routinely wind up in Spam folders or the wrong address. Moreover, the statute and regulations require that the Secretary make a separate notice to the candidate—indicating that this is beyond a simple notice provisions it is simply and expressly something that the objector must do to obtain jurisdiction

12. The Commission ultimately found as fact that Mr. Roof did not mail in accordance with the statutory text. However, based on its administrative authority to interpret the statute, the Commission found that compliance with the actual literal text of the statute was not required.

13. The Commission's first hearing was scheduled for, and held, on June 16, 2026. At that time, the Commission heard argument on the pending motions to dismiss and other discovery matters.

14. Walsh also moved to dismiss arguing as a statutory and constitutional matter that a Democratic voter and Officer, like Roof, had no standing to challenge a Republican nomination. The motion cited to Madden. Madden v. Secretary, 337 Mass. 758, 759 (1958) ("But there has been no case holding that a member of one political party has standing to enforce our election statutes in such a way as to challenge the action of

members of another political party in making a party nomination."). Despite a change in the statute, Walsh argued that since Roof cannot vote in the Republican primary, nor sign Republican nomination papers, he was not a "voter" within the meaning of the statute. Walsh also argued that any interpretation of the ballot objection statute authorizing one party's officials to challenge the other party's nomination was unconstitutional. Specifically that it would violate the Republican Party's freedom of association to control its own nomination process. The Commission denied the motion summarily the same day it was filed, but did address the matter in its final written decision.

15. As addressed herein, Walsh also moved to dismiss for failure to timely file and deliver the list of challenged signatures. The Commission, after delay, denied that motion.

16. Walsh also moved to strike and dismiss based on documents provided by the Secretary. The Secretary produced an access log for those who reviewed Walsh's nomination papers. That log shows that, contrary to his pleading, Mr. Roof did not personally observe the nomination papers before filing. Arguing that Roof did not have a good faith basis when he filed the objection, Walsh sought to strike and dismiss. The Commission did not even address this motion, either preliminarily or in its final decision.

17. The Commission scheduled daily afternoon hearing to start on June 16, 2026, despite a written email request on or about June 3rd not to schedule them on June 16-18 because Walsh was out of state handling a criminal sentencing in Key West Florida.

18. Following the hearing on the 16th, the Commission would adjourn two of its scheduled days of hearings, the 17th and 18th, at least as to Walsh.

19. A pair of similar objections were pending against Anne Manning Martin, a GOP candidate for Lt. Governor. One of the those objections was brought by Mr. Roof, in substantially identical terms to the Walsh objection. It also, apparently, suffered from the same certified mailing flaw.

20. A great deal of motion practice had proceeded the Commission's first hearing.

21. Roof had sought interrogatories from Walsh, and to compel answers. Walsh had opposed arguing that the jurisdictional motions must be ruled on first. The Commission overruled his argument and ordered answers to Roof's interrogatories.

22. Walsh had sought interrogatories from Roof, moving for them on or about June 12. The Commission acknowledge receipt of but did not act on the request, where Roof's were approved by the single commissioner on about 24 hours notice before an objection could even be interposed.

23. When the objections were raised again on June 22, the Commission denied the interrogatory motion, essentially finding that it was too late.

24. Under the Commission's regulations, an objector making a signature challenge must make a specific list of challenged signatures and the reason they are challenged. This list must both be "delivered," rather than served, to the respondent, and filed with the Commission. This list must be provided "no later than three weekdays prior" to the date of the Commission's first hearing.

25. Roof provided his list of challenged signatures by email on or about 6PM on Thursday, June 11, and mailed it by first class mail, contrary to the requirement to "deliver" it. The hearing, as noticed, commended on Tuesday June 16, in the afternoon.

26. Roof's list also did not have a page or key number to decipher it, and that was not provided until the following day, Friday, about noontime. The follow up, showing what page the key numbers referred to, was not provided until after the Respondent objected.

27. The Commission's case law provides that failure to timely file and deliver this list of challenged signatures requires "automatic dismissal" of an objection.

28. The Commission's regulations, despite being updated in 2016, do not provide for email service.

29. Walsh did not consent to email service.

30. The Commission's regulations, dealing with timely filing, do provide that if a filing is made by hand delivery, after business hours, it is deemed filed the next day. The regulations also provide that when an item is mailed, it is deemed filed when it is received.

31. Roof's list of challenged signatures, sent to Walsh by First Class Mail, was not received until Monday June 15.

32. Walsh's second motion to dismiss argued that the language of the regulation "no later than three weekdays" was intended to guarantee him three full business days

to prepare his defense. Resultingly that the list was due to be both filed with the Commission and "delivered" to Walsh by Thursday, June 11, at 9AM. Walsh also argued that even if email sufficed, it was sent after business hours closed, and under the regulations, must be treated as if given over on Friday—too late before the Tuesday June 16th hearing.

33. Walsh also moved to dismiss on standing grounds. Citing to a 1959 case called Madden, which indicated that the election laws of the Commonwealth had never been interpreted to allow a member of one party to interfere in the nomination of another party, Walsh sought dismissal. He also argued, despite the fact that the statute's language had changed to allow "any voter" to mount a challenge, that Roof still could not vote in the Republican Primary and had no interest. Walsh also argued that the objector statute could not constitutionally be interpreted to allow a member of one party, with no cognizable legal interest, to interfere in the selection process of another party.

34. The Commission, acting by single commission without any written opposition from Roof, denied the motion summarily. It did later work to explain its reasons in its opinion issued on June 26th.

35. The Commission also sat upon and did not act on Walsh's motion for a more definite statement, forcing him, at the last minute, to answer a vague and dissembling pleading.

36. There was a great deal of motion practice over subpoenas for witnesses.

37. Walsh's counsel also made a motion to recuse some of the Commission, since they had donated to his opponent. That oral motion was summarily denied.

38. Walsh's counsel renewed their objections and demanded rulings on the jurisdictional motions, but the Commission overruled the matter and put the case to trial on June 23.

39. The Commission heard from a number of witnesses called by Roof, including Anne Brensley, hand writing expert Jennifer Naso, Harold Hubschmann, MassGOP political director Aidan Carey.

40. The Commission also heard witnesses called by Walsh, including Carole Mietzch, Paul Burke, and Adam Roof.

41. The Commission denied, without argument or opposition, Walsh's written motion to disqualify Jennifer Naso as an expert. Appended to that motion was a decision from

the Ontario Superior Court, in Canada, finding Ms. Nash not credible as an expert based on several "inexplicable" deviations from professional norms. It also pointed to Ms. Naso's evasiveness on cross and other matters which damaged her credibility.

42. Walsh's motion to disqualify Naso as an expert also pointed to a strong and growing consensus by federal courts that much of handwriting analysis cannot pass the test for reliable expert testimony from Daubert v. Merrill Dow Pharmaceuticals.

43. Walsh would also later move orally to disqualify Harold Hubschmann, a professional signature gatherer, from being qualified as an expert. The Commission denied that motion.

44. Mr. Hubshmann also had a financial motive for hist testimony. Aside from a near monopoly he has in this state for this kind of work, allowing him to command premium money for his services, he also worked for Walsh's opponent. Mr. Hubschmann was paid $100,000 by Walsh's opponent and is likely owed a great deal more.

45. Walsh also objected to Ms. Anne Brensley, an attorney who professionally consults for real estate development, giving expert testimony she was not qualified to give. The Commission summarily denied that motion.

46. Brensley was not a member of the Walsh campaign. She did not collect the signatures being questioned, nor was she one of the signers whose signatures was being collected. Brensley did not work for Joe Bronkse. She had no first hand knowledge of the campaign and no expertise in the subject matter. In essence, Ms. Brensley's testimony was that she was the victim of fraud. Both Walsh's expertise and relevancy objections were rejected by the Commission out of hand.

47. Ms. Naso testified that there were indications of fraud. However she was unable to compare two specific signatures and explain her conclusion that they were all written by a single hand.

48. Due to delays by Roof in obtaining his evidence, Ms. Naso also admitted that she did not have any known exemplars from Scituate. Walsh moved to strike any consideration of the Scituate signatures (likely enough to keep Walsh on the ballot) since a known exemplar is foundational in hand writing analysis. On both a professional front and a legal one, working from a known exemplar has long been categorically required. Commonwealth v. Coe, 115 Mass. 481 (1874); Bacon v. Williams, 13 Gray 525 (1859), Commonwealth v. Eastman, 1 Cush. 189 (1848); Marcy v. Barnes, 16 Gray 161 (1860); King v. Donahue, 110 Mass. 155 (1872). The Commission denied the motion summarily.

49. Ms. Naso testified that her profession works on a 9 point scale of certainty. She said that "indications" of fraud are below a "probability." On cross exam she admitted that her level of certainty would not pass the preponderance of the evidence, i.e. that it did not pass the more-likely-than-not test, or not more than 50% certain.

Evidence Supports Same Writer	Strength	SWGDOC Conclusion	Strength	Evidence Supports Different Writer
Strongest	←←←←	Identification		
	←←←	Strong Probability		
	←←	Probable		
	←	Indications		
	•	No Conclusion	•	
		Indications Did Not	→	
		Probably Did Not	→→	
		Strong Probability Did Not	→→→	
		Elimination	→→→→	Strongest

50. Ms. Naso's 30+ page report also finds only "indications" of fraud. Her report was only provided to Walsh's counsel during her direct testimony. The sole accommodation the Commission offered for this belated disclosure was a 15 minute recess to review the report during cross.

51. The professional standard Ms. Nash worked under, written by a national group she contributes too, explains the 9 point scale. SWGDOC Standard Terminology for Expressing Conclusions of Forensic Document Examiners, s.4.1 provides, in relation an "indications" as follows (emphasis added):

> indications (evidence to suggest)—a body of writing has few features which are of significance for handwriting comparison purposes, but those features are in agreement with another body of writing. Examples—There is evidence which indicates (or suggests) that the John Doe of the known material may have written the questioned material **but the evidence falls far short of that necessary to support a definite conclusion**. DISCUSSION—**This is a very weak opinion**, and a report may be misinterpreted to be an identification by

some readers if the report simply states, “The evidence indicates that the John Doe of the known material wrote the questioned material.” There should always be additional limiting words or phrases (such as “may have” or “but the evidence is far from conclusive”) when this opinion is reported, to ensure that the reader understands that the opinion is weak. Some examiners doubt the desirability of reporting an opinion this vague, and certainly they cannot be criticized if they eliminate this terminology. But those examiners who are trying to encompass the entire “gray scale” of degrees of confidence may wish to use this or a similar term."

52. The whole 9 point scale, cross-referenced in Ms. Naso’s testimony, is laid out in the technical standard. The SWGDOC standard, although being nominally surpassed by the ANSI standard, the ANSI standard expressly adopts and cross-references the SWGDOC writings.

Identification (Definite Conclusion of Identity)
The highest degree of confidence expressed by document examiners. The examiner has no reservations and is certain, based on the evidence, that the writer of the known samples also wrote the questioned document.
Highly Probable
The evidence points very strongly to the same writer, possessing distinct similarities, but falls just short of the absolute certainty required for a definite identification.
Probable
The evidence indicates rather strongly toward the questioned and known writings having been written by the same individual.
Indications
A weak suggestion or evidence of similarity that leans toward the same writer, but is limited by the lack of quantity or quality of the comparison samples.
No Conclusion
Also referred to as "inconclusive" or "neutral." The evidence presents limited or conflicting support, or the combination of features is not sufficient to outweigh the similarities and differences, preventing the examiner from reaching a stronger opinion.
Indications Did Not Write
A weak suggestion or limited evidence pointing away from the writer, but not strong enough to form a conclusive opinion.
Probably Did Not Write
The evidence points rather strongly against the known writer being the author of the questioned document, though falling short of elimination.

Highly Probable Did Not Write
The evidence points very strongly toward a different author, with significant disparities in the writing characteristics.
Elimination (Definite Conclusion of Non-Identity)
The highest degree of confidence expressed for non-authorship. The examiner is certain, based on definitive dissimilarities, that the known writer did not write the questioned document.

53. The Commission, in its decision, openly and actually misstated the evidence given by Ms. Naso. They also put inappropriate weight on the testimony.

54. Ms. Naso, in both her testimony and her written report, gave the weakest possible positive conclusion.

55. She also testified that it was less likely, than probable, that the signatures were fraudulent.

56. Harold Hubschmann testified, over objection, that he is a professional signature gatherer and an expert. In his opinion, it is almost impossible that hundreds of signatures could be produced in the same order on different candidates nomination papers.

57. Mr. Hubschman's testimony was impeached on two important points. Mrs. Mietzch, Walsh's witnesses, testified that Hubschman had trained her about collecting signatures during a prior attempt at a ballot question. Mr. Hubschmann had told Mrs. Mietzch expressly that lining signatures up, so that every signer signs every petition in order, was the way to get the best bang for buck.

58. Mr. Hubschman's testimony was also impeached by Paul Burke, from Quincy. Mr. Burke testified that he personally collected signatures for Walsh, Manning Martin and Gubernatorial Candidate Michael Minogue. He explained about getting each voter to sign all three papers in the same order and occasionally needing to harangue people to get all three signatures. He testified that he's been doing this as a volunteer for more than 20 years. He indicated that he was working with Mr. Bronske as a favor. He further testified to having personally collected "hundreds" of signatures for Walsh in Weymouth.

59. Paul Burke was the only percipient witnesses to give first hand testimony.

60. The Objector, in fact, publicly posted Walsh's nomination papers (and others) claiming that they were openly fraudulent. He attempted to label this matter "petition gate" and sought to find people who would come forward and say their signature had been forged. No such witness was presented to the Commission.

61. In fact, Walsh tendered affidavits from people from Weymouth, whose signatures had been challenged. However, the Commission's regulations, in derogation of their statute, does not allow affidavits into evidence.

62. The crux of the Objector's case, despite trying to put the Respondent to the trouble and expense of proving thousands of signatures for which the Objector could not and did not even attempt to make a case, was Mr. Joe Bronske. Bronske, formerly chair of the Weymouth RTC, was hired by Walsh and others to collect signatures.

63. Ms. Anne Brensley testified that she was a GOP Lt. Governor candidate who did not make the ballot because Mr. Bronske both defrauded her and forged signatures on her nomination papers. Over objection about both relevance and expertise, she was allowed to testify that Walsh' signatures were fraudulent. She based this conclusion solely upon a list regarding of Weymouth voters.

64. The Commission incorrectly wrote that Ms. Brensley did not have sufficient signatures because of Mr. Bronske. Atty Tassinari, the director of the Elections division, wrote an affidavit to the Superior Court less than a month ago that Ms. Brensley, simply did not have enough signatures, regardless of Mr. Bronske's efforts or lack thereof.

65. The Commission was also categorically loose with important details. The Commission wrote that Walsh submitted 10,677 signatures. This is manifestly incorrect and shorts Walsh about 50 signatures since he submitted 10,723 according a paper receipt signed by the Elections Division. This may be a cut and paste error from the Manning Martin decision, which has a number of findings and ruling which are identical to the opinion in Walsh's case.

66. There was some testimony about a list of Weymouth voters, which was apparently extracted from a MassGOP database. The list, was admitted into evidence without display or examination, and the Commission subsequently refused (or did not act upon) a request for a copy. To this date Walsh has not been provided a copy, nor been

able to test it. It was not displayed to the Commission, simply brandished on a thumb drive.

67. The logic goes that the order of the names on the list of Weymouth voter is the same as on Walsh's nomination papers, Brensley's nomination papers, and Manning Martin's nomination papers. This, therefore, is evidence that Mr. Bronske forged the signatures after obtaining the list.

68. Much was made about the database in the Manning Martin cases. Including a showing that the list was not extracted from the database until April 30th, by the database owner (which is not actually the MassGOP but one of its adherents). This logic falls against the testimony of Mr. Burke that he collected names in the same order, and was doing so al the way back into February, before the list was extracted from the database. The Manning Martin case also featured evidence suggesting that a list would, by a signature collector like Bronske, be typed up and then input into the database to show validity rate and enable payment—being in substance a showing that the list followed the signatures, not the other way around.

69. Most egregiously, in the Manning Martin case, testimony came out that the list had been altered by Ms. Brensley. And that it was altered right before Ms. Brensley brought a superior court action to seeking to extend the ballot deadlines and give her more time.

70. The Commission, appears, erroneously, to have transported finding on testimony from the Manning Martin case into the Walsh case, without giving Walsh an opportunity test or challenge any of it.

71. The Commissions decision does not address or describe any of the testimony from Walsh's witnesses. Even those who, if credible, would directly undermine the logic the Commission adopted and require the opposite conclusion.

72. Mr. Paul Burke, a disabled retired firefighter from Quincy, testified that he knows Joe Bronske. He testified that he volunteers collecting signatures and has done so for 20 years. He testified that he collected signatures from the middle of February up until the about April 30th. He swore he collected for Manning Martin, Walsh, and GOP Gubernatorial Candidate Michael Minogue. He said that he collected at both the South Shore Plaza, once a week, and the East Bridgewater Sportsman Club. He testified that in this cycle he always collected in the same order, Minogue, Manning

Martin, and Walsh so that the signers just signed three papers in the same order. He testified that he collected hundreds of signatures from Weymouth. He testified that he gave over the signatures he collected to Joe Bronske weekly.

73. Burke was the only first hand testimony about Walsh's signatures that were challenged. His credible testimony undermined the Objector's entire case. Yet the Commission did not even address it, at all.

74. The Commission also noted, in their decision, that Naso did not have the Scituate exemplars. Presumably because she could not and did not make any professional observations of them, according to the professional standards and the case law. Nonetheless, the Commission, on their own steam, make observations that Walsh's Scituate signatures must be thrown out.

75. This is contrary to decades of case law from the Commission:

> The most common expert testimony heard by the Commission is that of a handwriting expert. Although the members of the Commission are not handwriting experts, the members have the authority to decide questions of genuineness by comparing the signatures on the petition with the standards contained in the voter registration books, cards, and affidavits of voter registration put into evidence. *See Hannigan v. Bd.of Appeals*, 328 Mass. 366, 370 (1952). **However, despite this power, the Commission has in the past made its determination as to genuineness based on its own examination of the disputed signatures only when supported by other evidence introduced by the objector, which is usually in the form of expert handwriting testimony or testimony by purported signers.** *DiGiustini v. White*, S.B.L.C. 90-11, at 6–7. Since the Commission began writing statements of reasons for all of its decisions in 1978, **the Commission has never invalidated a nomination based solely on its own members' uncorroborated examination of challenged signatures**. *DiGiustini v. White*, S.B.L.C. 90-11, at 6–7. The practice of the Commission, therefore, has been to listen to the testimony presented by the expert as to comparisons between the signatures on the petitions and signatures on various other official records and affidavits.

Michelle Tassinari, Paul Lazour et al, *Massachusetts Election Administration, Campaign Finance, and Lobbying Law,* MCLE (5th Ed. 2020) (emphasis added).

76. Thus this is the first time since the Commission's creation in the 1880s that the Commission has discarded signatures, on its own untrained eye, without affirmative expert assistance.

77. The Commission did not at all address how Walsh's case degraded the evidence presented by Roof. Nor did they the address the irreconcilable conflict between the first-hand percipient witness testimony of Paul Burke, who collected "hundreds" of legitimate signatures, and armchair quarterbacking by Naso and Hubschmann.

78. The Commission also misapplied the governing standards of law.

79. The McCarthy case (1977) requires that signatures be counted unless there is "substantial doubt" that the voter did not sign or was no eligible to sign.

80. Ms. Naso did not, and could not, go signature by signature. This is required by the Hebert case (Mass. App. Ct. 1980) which notes that good signatures can be mixed in with bad ones. Hebert v. State Ballot Law Commission, 10 Mass. App. Ct. 275, 279 (1980) (noting that even though bad signatures may be mixed with good ones, the honest signers still have a right to have their signature counted).

81. Nonetheless, on slim evidence, of a list of uncertain dates and unproven integrity, from one town (Weymouth) invalidate signatures from multiple towns.

82. The Commission also failed to adhere to the rule of Hebert, instead invalidating entire sheets.

83. The Commission did not, in denying the motion to dismiss for the late list of challenged signatures, find when the signatures should have been delivered or filed.

84. The Commission misstated the evidence given by the hand writing examiner, stating it to be strong and more complete than it was.

85. The Commission did not address the affirmative evidence provided by Walsh, especially the testimony of Mr. Paul Burke.

86. The Commission did not rule on the motions to strike and dismiss, for the false pleading that Roof had personally examined the nomination papers before filing.

87. The Secretary (and the Commission) also incorrectly did not count so-called "zeros.". Walsh submitted a stack of nomination papers, approximately an inch high, containing sheets where the Town Clerks did not certify any signatures. Walsh estimates that there may be 200 signatures there, which were incorrectly not certified by the Town Clerks. The Commission and the Elections Division take the position that they cannot add to the certified signature count. However this is contrary to the case law, about the broader standard applied to Court and Commission review of signatures. It is also contrary to some of the Commission's case law, which at least allows for the possibility.

88. The Commission's decision was arbitrary and capricious.

89. The Commmission's decision was a contrary to law and the constitutions of the State and United States.

90. The Commission's decision was against the substantial weight of the evidence.

91. The Commission's decision was unauthorized by law, it not having any jurisdiction over the objections.

92. The Commission wrongly delayed, and then denied, the motion to dismiss on jurisdictional standing and voter certificate

93. The Commission wrongly delayed, and then denied, the motion to dismiss for failure to provide a timely signature list.

94. The Commission wrongly denied the motion to dismiss for standing on both statutory and constitutional grounds.

95. The Commission's decision wrongly arrogates power to itself, for the first time in about 142 years, to disqualify signatures on its own steam without positive expert assistance.

96. The Commission was also not a neutral decision maker. It's members showed partisanship. So to is the slanted nature of its decision, such as refusing to

acknowledge or discuss Walsh's affirmative evidence. So to is the fact that it sustained almost every objection by Roof, denied every objection by Walsh. The Commission gave Roof interrogatories but denied Walsh the same. The Objector was allowed to present his case at leisure, while Walsh was confined in his cross examinations (despite three afternoons of unused scheduled hearing dates) and forced to hurry up his cross examination. The Commission, just recently stocked to full membership by appointments by Her Excellency, is also stocked with partisans who have donated to both Walsh's Opponent, and to Governor Healey and Lt. Governor Driscoll. Walsh was denied regular process and his jurisdictional objections left hanging while discovery and later testimony proceeded. Walsh was denied subpoenas for his own case.

97. The Court has jurisdiction over timely appeals under G. L. c. 55B and G. L. c. 30A.
98. The Court also has jurisdiction under G. L. c. 56 s. 59 to review certification of signatures.
99. The Court can also give relief in the nature of mandamus, prohibition, certiorari, and declaratory relief.
100. The Commission's decision is manifestly and palpably wrong.
101. The Decision must be set aside and an order enter restoring Walsh to the September 1 Primary ballot.

Respectfully Submitted,
/S/ Michael Walsh
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