

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

STATE BALLOT LAW COMMISSION
Docket No. 26-04

_____)
ADAM ROOF,)
Objector)
)
v.)
)
MICHAEL WALSH,)
Respondent)
_____)

DECISION

For the reasons stated in the attached Statement of Reasons, the Objection of Adam Roof is SUSTAINED on the merits and the Respondent's name shall not be printed on the Republican State Primary ballot.

STATE BALLOT LAW COMMISSION

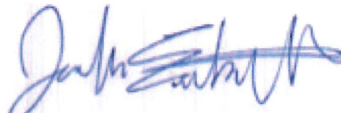
The Office of the Commission is:

State Ballot Law Commission
c/o Elections Division
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One Ashburton Place, Room 1705
Boston, Massachusetts 02108

617-727-2828



Hon. Ernest L. Sarason, Jr. (Ret.), Chair



Joseph Eisenstadt, Esq.



Jed Nosal, Esq.



Kaitlyn Sprague, Esq.

Dated: June 26, 2026

IMPORTANT:

Judicial review of this decision may be sought by civil action under G. L. c. 30A, § 14, within 5 days after receipt of this notice.

ELECTIONS DIVISION
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COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

STATE BALLOT LAW COMMISSION
Docket No. 26-04

ADAM ROOF,)
 Objector)
 v.)
 MICHAEL WALSH,)
 Respondent)

STATEMENT OF REASONS

I. INTRODUCTION

The Respondent, Michael Walsh, is a Republican candidate for Attorney General. He timely filed nomination papers with the Secretary of the Commonwealth containing a total of 10,677 certified signatures. To qualify as a candidate for Attorney General, the Respondent needed at least 10,000 certified signatures. Thereafter, an objection was filed with the State Ballot Law Commission challenging the validity of certain signatures appearing on the Respondent’s nomination papers.

The State Ballot Law Commission (Commission) has jurisdiction to determine whether he satisfies these criteria pursuant to General Laws chapter 55B, section 4.

II. OBJECTION

On June 3, 2026, an objection was filed challenging some of the Respondent’s signatures appearing on his nomination papers as being written in the same hand, not signed in person by the voter, signed by people who were not registered voters, signed by people who, although registered, were not eligible to be registered, non-genuine, fraudulently obtained and certified twice. The Objector must prove that 678 signatures filed with the Secretary of the Commonwealth are invalid. If proven, the Respondent would have an insufficient number of signatures to appear on the ballot.

III. PRELIMINARY PROCEDURAL MATTERS

On June 16, 2026, a hearing was noticed by the Commission in order to consider preliminary matters. The Commission considered several preliminary matters before hearing the Objection itself, which was continued on June 22, 2026 and June 23, 2026.

A. Respondent's Motion to Dismiss for Lack of Standing

The Respondent filed a Motion to Dismiss on the grounds that the Objector lacks standing. As a basis for this Motion, the Respondent argues that because the Objector is registered in the Democratic Party, he is not eligible to vote in the Republican Primary and since the outcome of the objection does not affect him or his choice for office, he has no standing.

In his Motion, the Respondent cites two cases in which the voter enrollment certificate of the objector was determined invalid for not specifying the objector was of the same party of the sought nomination. Madden v. Secretary, 337 Mass. 758 (1958); Kelley v. State Ballot Law Commission, 316 Mass. 512 (1944). However, the Respondent acknowledges the case law is from a prior version of the statute. As the current language of section 5 of chapter 55B of the General Laws does not specifically require an objector be registered in the same party of the respondent or not enrolled in any party, the Commission **DENIED** the Respondent's Motion to Dismiss on June 10, 2026

B. Respondent's Motions to Dismiss for Lack of Certified Mail

The Respondent filed a Motion to Dismiss the Objection based on the grounds that the Objector failed to mail a copy of his Objection by registered or certified mail, return receipt requested, as set out in G.L. c 55B, § 5 paragraph 9. This paragraph states, in part, that failure to do so shall invalidate any objection filed with the Commission. The Commission's regulations provide that "[n]ot later than the day after the objection is filed the objector shall mail a copy of the

objection to the respondent by registered or certified mail return receipt requested.” 950 CMR 59.02(4)(a).

The Objector acknowledged that the Objection was not sent by registered or certified mail, return receipt requested. The Objector presented an affidavit from an agent of the Objector, John Alexander Bausch, indicating that this agent was tasked with the responsibility to mail the Objection first class certified with a return receipt requested. Mr. Bausch’s affidavit indicates that he went to a United States Postal Service office and left the Objection with a postal clerk requesting that the Objection be mailed first class certified with a return receipt requested.¹ Mr. Bausch left the office without confirmation that the Objection was properly mailed. In the Respondent’s Motion to Dismiss, the Respondent acknowledged receiving the Objection via email and regular first class mail.

Accordingly, the Commission finds that the Objection was not mailed by registered or certified mail return receipt requested as set out in section 5 of chapter 55B of the General Laws, paragraph 9 and 950 CMR 59.02(4)(a). However, the Commission declines to grant the Motion to Dismiss based on a failure to meet the statutorily prescribed mailing requirement where actual, timely receipt of the Objection occurred, and no prejudice was demonstrated by the Respondent.²

The Commission is statutorily charged with the responsibility, as gatekeeper of ballot access, to ensure that access to the ballot is gained in a manner and process consistent with the overall statutory and constitutional standards and requirements relating to election laws and access to the ballot.

Consistent with this charge, the Commission further finds that the lack of a certified mailing

¹ The Respondent further argues that that Objector lied on the certificate of service by signing under the penalty of perjury that a copy of the Objection had been sent via certified mail. The Commission finds that the Objector intended and attempted to send via certified mail and therefore rejects this argument.

² The Commission stresses that its determination with regard to this portion of its Decision is based solely on the individual facts particular to this case. This determination is by no means intended to abrogate the statutory and regulatory notice requirements relating to the filing of objections.

had no adverse consequences whatsoever relating to the Respondent's defense of the claims made in the Objections at issue. The Respondent received a copy of the Objection via e-mail from the Objector on June 4, 2026, a day after it was filed with the Commission but a day before the deadline to file an objection. The Respondent also received the Objection from the Secretary of the Commonwealth via e-mail on June 3, 2026, the same afternoon as it was filed. Hence, the electronic notice of the Objection was received well in advance of when the Objection would have been received if only sent by certified or registered mail.

There is no claim that the Respondent was prejudiced in any way by the Objector's careless mailing. The Respondent argues that solely because of this mailing misstep, automatic dismissal is required under G.L. c 55B, § 5 paragraph 9 (and 950 CMR 59.02(4)(a) based on Section 5) which states, in part, "failure to do so [mail by registered or certified mail] shall invalidate any objections filed with the Commission."

As noted, Respondent does not and cannot claim that the lack of proper certified mailing created prejudice or other harm to him. Instead, it is a literal application of the specific wording of the statute upon which Respondent relies-- that mailings not made by certified mail "shall" invalidate the objection. It is the Respondent's position that this language is mandatory and requires an automatic dismissal of the Objection. The Commission does not agree first based on the well-recognized ability of agencies of the Commonwealth to excuse prescriptive service requirements where actual, timely service is proved. Cinder Prods. Corp. v. Schena Const. Co., 22 Mass. App. Ct. 927, 928 (1986). And, second, within the arguably heightened standards of ensuring the integrity of elections and access to the ballot, the Commission has authority to interpret its enabling statute, including the treatment of mandatory, statutory requirements, in a manner that does not contravene the legislative purposes of the election laws. Swift v. Board of Registrars of Voters of Quincy, 281 Mass. 271, 276 (1932). "The word 'shall' as used in statutes, although in its common

meaning mandatory, is not infrequently construed as permissive or directory in order to effectuate a legislative purpose.” Swift at 276.

The word “shall” is used throughout the election laws, but it must be interpreted in a manner that facilitates the legislative intent and purpose of the laws, to have free and fair elections, that are also free from fraud. “It is an aid to interpretation to establish tests by which to measure legislative intent. But all such tests must yield to the underlying aim of all statutory interpretation which is to discern the legislative intent disclosed by the enactment as an entirety in light of its dominant purpose and to declare its appropriate application to particular facts. The regnant design of all election laws is to provide expeditious and convenient means for expression of the will of the voters free from fraud. The right to vote is a precious personal prerogative to be sedulously guarded.” Arts. 4, 7, 8, 9 of the Declaration of Rights. “The public welfare demands that elections be protected from fraud.” Swift at 276 and 277.

The Objector concedes and the record demonstrates that the Objection was not filed as prescribed in the statute. At the same time, the record before the Commission pertaining to the Motion to Dismiss shows that the Objection was received by the Respondent in a timely manner, if not timelier than had only the statutorily prescribed process been followed. The “proof of service” that certified or registered mail is intended to provide was met here but through multiple other means. Cinder Prods. Corp. v. Schena Const. Co., 22 Mass. App. Ct. 927, 928 (1986); Mullane v. Central Hanover Bank & Trust Co., 339 U.S. 306 (1950). Receipt of the Objection is not in question, and the Respondent has not demonstrated prejudice even considering the parameters of the truncated Objection process where timely notice remains paramount. Further, the Commission’s recognition of service in the instant case in a form different from the statutory prescribed process is also consistent with the Commission’s authority to interpret the requirements governing Objections, including the treatment of the term “shall” as permissive, in a manner

consistent with the legislative purpose of the Commission as recognized by the courts “to provide expeditious and convenient means for expression of the will of the voters free from fraud.” Swift at 277. The Commission may only investigate allegations regarding the legality, completeness and accuracy of nomination papers upon the presentation of an Objection. Accordingly, the Commission will not dismiss an objection where it was properly and timely filed with this body and actual, timely service was effectuated to the Respondent without prejudice.

Respondent’s Motion to Dismiss for lack of certified mailing is **DENIED**.

C. **Respondent’s Motion to Dismiss for Failure to Timely File and Disclose the List of Challenged Signatures**

The Respondent filed a third Motion to Dismiss based on the grounds that the Objector failed to file and deliver a detailed list of all challenged signatures “showing” the page and line where each signature is located “[n]ot later than the third weekday before the date of the hearing,” which, in this case, was by June 11, 2026. Respondent objected on the grounds that the list was received via e-mail from the Objector after 5:00 p.m. on June 11, 2026 and suggests that it was not timely filed with the Commission. The record shows that the list was timely filed by hand with the Commission before 5:00 p.m. on June 11, 2026. Further, the Respondent argues that the list received was insufficient as it did not include a “key to the page numbers,” and that the Objector did not provide copies of the nomination papers on which the challenged signatures appeared.

The Commission’s regulations, 950 CMR 59.04(1)(f), state in pertinent part:

“Not later than the third weekday before the date of the hearing contained in the Secretary’s notice, the objector shall file and cause to be delivered to the respondent a list of all signatures on the respondent’s nomination paper or petition which are drawn in question by the objection, showing the page and line where each is located, and the reason why each is alleged to be improper.”

The Commission’s cases require automatic dismissal, or in this case, exclusion of signatures not supplied in a timely fashion, since the failure to supply such information “affects” the

respondent’s “substantial rights” to prepare his case. Pieroni v. Garron, SBLC 98-6 (June 18, 1998); Schmidt v. Onessimo, SBLC 86-2 at 2 (June 16, 1986); Harvey v. Turo, SBLC 82-3 (June 10, 1982). The Commission requires strict adherence to its notice and its discovery regulations. Hurst v. O’Connor, SBLC 98-2 (remand decision, June 26, 1998) (signatures raised at hearing, where objector failed to include signatures in Objector’s List of Challenged Signatures were not properly before the Commission). The Commission has long held that compliance with the 950 CMR 59.04(1)(f) is mandatory.

The Commission finds that the Objector timely filed and caused to be delivered their lists of challenged signatures showing the page and line where they appear on the nomination papers filed with the Secretary, with the stated reason why the signatures were being challenged.

The Respondent claims the filed list was defective on the grounds that it did not provide copies of the actual pages where the challenged names appeared or any of the actual names of the voters who were being challenged. Such disclosures are not required by the regulations.

The Commission further finds that the Objector provided the Respondent with the supplemental information—access to the specific nomination papers identified in the list—on June 12, 2026.³

Accordingly, the Commission finds that the Objectors complied with 950 CMR 59.04(1)(f). Respondent’s Motion to Dismiss for failure to timely file and disclose the list of challenged signatures is **DENIED**.

IV. HEARING

Evidence was received on Tuesday, June 23, 2026. Seven (7) witnesses testified and six (6) exhibits were received. The matter having been heard and after consideration of the pleadings, stipulations, evidence and arguments of the Parties, the Commission finds, rules and concludes as

³ The page and line of the particular challenged signature references the page as numbered the Secretary upon filing and the line number for each signature line on the nomination paper.

set forth in the following sections of this Decision.

V. FINDINGS OF FACT

The Commission finds the following facts:

1. The Respondent, Michael Walsh, is seeking the Republican nomination to the office of Attorney General.

2. To qualify to have his name printed on the ballot, he must have filed 10,000 certified signatures with the Office of Secretary of the Commonwealth by 5:00 p.m. on June 2, 2026.⁴

3. The Respondent filed 10,677 certified signatures with the Office of Secretary of the Commonwealth by 5:00 p.m. on June 2, 2026 as well as the other required paperwork.

4. On June 3, 2026, Adam Roof, a registered voter in the Commonwealth of Massachusetts, filed an objection before the State Ballot Law Commission alleging that some of signatures appearing on the Respondent's nomination papers were written by the same hand, were not legally signed in person by the voter, and some of the signatures were non-genuine and were fraudulently obtained.

5. The Respondent denied the allegations.

6. Aidan Carey, Political Director and Keeper of the Records of the Massachusetts GOP, provided the Commission with a copy of the Numinar database for the Weymouth voter list that was exported by Joseph Bronske on April 30, 2026.

7. Jennifer L. Naso, a forensic document examiner employed by Riley, Welch, LaPorte & Associates, Frankenmuth, MI, since 2011, testified as a forensic handwriting expert. She is a graduate of Yale University and has a Masters in Forensic Science from University of New Haven. Ms. Naso was previously employed as a documents analyst by the United States Secret Service

⁴ Other filing requirements included his written acceptance, an enrollment certificate, a receipt from the State Ethics Commission showing she filed a Statement of Financial Interest with that agency and a receipt from the Office of Campaign and Political Finance showing he filed a statement with that agency regarding spending limits.

from May 2006-2011. The Commission finds her qualified to testify about the matters before the Commission and allows the submission of her Report relating to her observations regarding nomination papers in this case.

8. Ms. Naso examined high resolution images of the Respondent's nomination papers. Ms. Naso concluded, based on her expert opinion, that most of the voter signatures appearing on the Respondent's nomination papers from Weymouth and Scituate were written by the same person.

9. Ms. Naso concluded that 241 certified signatures appearing on thirteen (13) of the Respondent's nomination papers from Scituate were more likely than not written by the same person.

10. Ms. Naso concluded that 690 certified signatures appearing on thirty (30) of the Respondent's nomination papers from Weymouth were more likely than not written by the same person.

11. Ms. Nason concluded that 90 certified signatures appearing on four (4) of the Respondent's nomination papers from Weymouth were more likely than not written by more than one writer, but that the signatures are non-genuine.

12. Ms. Naso further reviewed exemplars of the 780 voters identified in Findings 10 and 11 whose signatures who were certified on the Respondent's nomination papers from Weymouth and concluded that "none of the seven hundred and seventy (770) individuals whose known signatures were submitted for comparison wrote their respective signatures on the disputed petitions."

13. Ms. Naso also compared the voter names appearing on the Respondent's nomination papers from Weymouth to the list of Weymouth voter names and addresses contained in the Numinar database exported by Mr. Bronske. She observed that each of the Respondent's

nomination papers from Weymouth matched portions of the spreadsheet in the order they appear, and concluded “[t]his evidence indicates that the names and addresses on the petitions were copied from the source . . . spreadsheet in the order in which they appear.”

14. Anne Brensley, the endorsed candidate for the Republican nomination for Lieutenant Governor, testified that she engaged the services of Joseph Bronske to collect signatures on her nomination papers in connection with her candidacy for Republican nomination for Lieutenant Governor.

15. Ms. Brensley knew that Mr. Bronske was circulating nomination papers for other Republican candidates, including the Respondent.

16. Ms. Brensley later made an inquiry to the Massachusetts GOP as to whether Mr. Bronske had “run any voter list” and if so, to receive a copy of whatever he had run.

17. In response to her inquiry, Ms. Brensley received a copy of a spreadsheet from the Massachusetts GOP titled “all Weymouth voters,” which is the same list exported by Mr. Bronske.

18. Following receipt of the Weymouth voter list, Ms. Brensley compared the list to the names of voters appearing on her nomination papers that had been collected by Mr. Bronske. Ms. Brensley testified that she found the names on her nomination papers to be in the exact same order as they appeared in the spreadsheet.

19. Ms. Brensley reviewed the Respondent’s Weymouth nomination papers and observed that all the names appearing on her nomination papers and the Respondent’s nomination papers were identical to the list given to Mr. Bronske.

20. Ms. Brensley observed that, not only were the names on her nomination papers identical to the names appearing on the Bronske voters list, but the same names on her nomination papers and the Respondent’s nomination papers were in the exact same order on the numerous nomination papers submitted to the Weymouth Town Clerk.

21. Based on what Ms. Brensley discovered, which she concluded was that the signatures obtained from Mr. Bronske were forged, she did not submit any nomination papers obtained through Mr. Bronske to the Secretary of the Commonwealth. As a result, Ms. Brensley had an insufficient number of certified signatures to have her name printed on the ballot.

22. Harold Hubschman of SignatureDrive.com testified about matters relating to his experience as a signature gatherer for nomination papers and initiative petitions in Massachusetts and other states. Mr. Hubschman has been in the voter signature gathering business for over 31 years. His company has gathered millions of signatures for candidate nominating papers and initiative petitions. The Commission finds him qualified to testify about the matters before the Commission in this action.

23. Mr. Hubschman testified that he was provided with the same Numinar list, which he compared to the names on the Respondent's nomination papers. He also stated that he compared the Respondent's nomination papers with the nomination papers of Anne Manning Martin, Republican candidate for Lieutenant Governor, filed with the Secretary of the Commonwealth, which are public records that the Commission takes judicial notice.

24. Based on his review, Mr. Hubschman concluded that in the Town of Weymouth, there are 665 certified signatures on 29 pages of the Respondent's nomination papers that are in the identical order as on 29 corresponding pages of Anne Manning Martin's nomination papers, with only one deviation. Mr. Hubschman concludes the mathematical likelihood of this occurring is zero and that these signatures are likely fraudulent.

25. The Commission invalidates a total of 1,021 of the Respondent's 10,677 signatures filed with the Secretary of the Commonwealth by June 2, 2026, resulting in 9,656 remaining valid signatures.

VI. ISSUES OF LAW AND CONCLUSIONS

A. Evidentiary Standard Used by the Commission

The Commission’s findings are based on substantial evidence, which is defined as “such evidence as a reasonable mind might accept as adequate to support a conclusion.” G. L. c. 30A, § 1(6) (2024 ed.); Capezzuto v. State Ballot Law Commission, 407 Mass. 949, 952 (1990); Hershkoff v. Registrars of Voters of Worcester, 366 Mass. 570, 574 (1974); Labor Relations Commission v. University Hospital, Inc., 359 Mass. 516, 521; (1971); Almeida Bus Lines, Inc. v. Department of Public Utilities, 348 Mass. 331, 341 (1965).

In proceedings before the Commission, the objector has the burden of going forward. Hamill v. Sawyer, SBLC 90-14 (June 27, 1990). The objector must meet his burden of proof by proving his allegations by a preponderance of the evidence. DeJong v. Owens, SBLC 90-10 (June 22, 1990).

B. Scope of Commission’s Review of Challenged Signatures

Under Massachusetts General Laws, Chapter 53, section 7, “every *voter* signing a nomination paper shall sign in person as registered or substantially as registered” G. L. c. 53, § 7 (2024 ed.). The only exception to this requirement is that a voter who is physically disabled and therefore unable to sign may have another, in his presence, sign his name. G. L. c. 53, § 7 (2024 ed.). The local election officials are limited, in substance, to a comparison of the signature as found on the nomination papers to the names of those persons listed on the official lists of registered voters. McCarthy v. Secretary of the Commonwealth, 371 Mass. 667, 687 (1977); 950 CMR 55.03(1)-(4).

However, unlike the local registrars, the Commission has consistently applied a broad and equitable standard when considering the validity of certified signatures so as to facilitate the will of the voter whenever justice and fairness allow. Auger-Collins v. Callahan, SBLC 90-8 (June 22, 1990); Lam v. Conner, SBLC 90-7 (June 20, 1990). The Commission has applied the standards

analogous to those used by the courts given the nature of Commission proceedings. Id. Like a court, the Commission may receive extrinsic evidence, which the registrars could not, and may declare a signature certifiable in exercising its equitable powers whenever it finds that the signer is an eligible voter of the proper district. Jacobucci v. Kelley, SBLC 90-15 (June 29, 1990); Auger-Collins v. Callahan, SBLC 90-8 (June 22, 1990); Lam v. Conner, SBLC 90-7 (June 20, 1990); McCarthy, 371 Mass. at 684. This principle is bolstered by the consistent judicial policy of resolving voting disputes, where at all possible, in favor of the voter. McCavitt v. Registrars of Voters of Brockton, 385 Mass. 833, 837 (1982). Thus, a voter's signature should be counted unless there is "substantial doubt that the signer was a registered voter . . . eligible to sign a nomination petition." McCarthy, 371 Mass. at 684.

C. **Objection Allegations that Certain Nomination Papers Contained Certified Names that are Non-Genuine**

The Objector alleges that certain signatures appearing on the Respondent's nomination papers are non-genuine. The Commission has a longstanding practice of reviewing signatures for their authenticity based upon their own comparison of the signatures on the nomination paper or petition with the exemplars contained in the voter registration books, cards, and affidavits of voter registration or other reliable documents containing known signatures put into evidence. See Hannigan v. Board of Appeals, 328 Mass. 366, 370 (1952). While the Commission has considered the expert testimony of handwriting experts and found it helpful, the testimony of such experts is not dispositive. In this case, the Objector alleges that multiple signatures were signed by the same person or persons and that they are non-genuine.

i. **Testimony of Forensic Document Examiner Jennifer Naso**

The Objector retained the services of Jennifer Naso, a forensic document examiner employed by Riley, Welch, LaPorte & Associates, Frankenmuth, MI since 2011. She is a graduate

of Yale University and has a Masters in Forensic Science from University of New Haven. Ms. Naso was previously employed as a documents analyst by the United States Secret Service from May 2006-2011. The Commission finds her qualified to testify about the matters before the Commission and allows the submission of her Report relating to her observations regarding nomination papers in this case.

Ms. Naso examined high resolution images of the Respondent's nomination papers. The Commission found her qualified to testify about the matters before the Commission and allowed the submission of her Report relating to her observations regarding nomination papers in this case. Ms. Naso concluded, based on her expert opinion, that most of the voter signatures appearing on the Respondent's nomination papers from Weymouth and Scituate were written by the same person.

Ms. Naso concluded that 241 certified signatures appearing on thirteen (13) of the Respondent's nomination papers from Scituate were more likely than not written by the same person. Her conclusions were based on the pictorial similarity in the writing and the low skill level of the writing, which was consistent throughout pages numbered 1 and 3-14 by the Secretary's Elections Division, all of which were from the Town of Scituate. While the Objector also submitted exemplars for each voter as provided by the Scituate Town Clerk's Office to the Commission, Ms. Naso did not review these exemplars. The Commission, having reviewed the nomination papers, exemplars and Ms. Naso's report, agree and invalidate the 241 certified signatures appearing on the Respondent's Scituate nomination papers numbered 1 and 3-14.

Ms. Naso concluded that 690 certified signatures appearing on thirty (30) of the Respondent's nomination papers from Weymouth were more likely than not written by the same person. Her conclusions were based on the lack of variation of the stylization of the signatures, that most were hand printed names instead of signatures, the sequencing of the signatures on the papers

as well as a comparison of the exemplar voter signatures provided by the Weymouth Town Clerk's Office.⁵ Ms. Naso concluded that 90 certified signatures appearing on four (4) of the Respondent's nomination papers from Weymouth were more likely than not written by more than one writer, but that the signatures are non-genuine.

Ms. Naso further reviewed exemplars of the voters whose signatures who were certified on the Respondent's nomination papers from Weymouth and concluded that "none of the seven hundred and seventy (770) individuals whose known signatures were submitted for comparison wrote their respective signatures on the disputed petitions."

As part of her review, Ms. Naso compared the voter names appearing on the Respondent's nomination papers from Weymouth to the list of Weymouth voter names and addresses contained in the Numinar database exported by Mr. Bronske. She observed that each of the Respondent's nomination papers from Weymouth matched portions of the spreadsheet in the order they appear, and concluded "[t]his evidence indicates that the names and addresses on the petitions were copied from the source ... spreadsheet in the order in which they appear."

The Commission, having reviewed the nomination papers, exemplars and Ms. Naso's report, agree and invalidates the 780 certified signatures appearing on the Respondent's Weymouth nomination papers numbered 15-49.

ii. Testimony of Signature Gathering Expert Harold Hubschman

The Objector presented testimony from a signature gathering expert, Harold Hubschman. Mr. Hubschman was provided a copy of the so called "Numinar list of Republican and unenrolled voters maintained by the Republican State Committee." He was also provided with the nomination papers the Respondent submitted to the Weymouth Town Clerk's Office and thereafter filed with the Secretary of the Commonwealth. Mr. Hubschman also reviewed digital copies of the

⁵ The sequencing of the names refers to voters who share the same address are not sequential and therefore do not logically align.

nomination papers submitted by the Republican Lieutenant Governor candidate Anne Manning Martin to the Weymouth Town Clerk's office and thereafter filed the Secretary of the Commonwealth's Office. Based on his review of both sets of nomination papers from Weymouth, he, like Ms. Naso, found twenty-nine (29) pages of the Respondent's nomination papers in the exact same order as candidate Anne Manning Martin. In addition to being identical on both sets of papers, they are listed in the same order as they appear in the Numinar database of Weymouth registered voters. The Respondent's nomination papers reviewed by Mr. Hubschman were numbered 15-49 by the Secretary of the Commonwealth's Elections Division. Based on this review, he concluded that the petitions exhibit overwhelming signs of fraud.

The Respondent provided testimony from two (2) witnesses regarding the Respondent's signature collection process. The first witness, Carol Mietzsch, testified that she worked on the Respondent's campaign and received the certified nomination papers and reviewed them only to ensure they were properly marked by the local election officials. She testified that she did not review the names or signatures on any nomination papers. The second witness was Paul Burke, who testified that he helped collect signatures for the Respondent and worked with Mr. Bronske. His testimony was not specific to the Respondent's nomination papers in question and instead more general about his experience in collecting signatures for various candidates, including Anne Manning Martin. The Commission did not find value in their testimony.

ii. Testimony of Anne Brensley

Anne Brensley is a candidate for the Republican nomination for Lieutenant Governor. Ms. Brensley received the Party's nomination at its State Convention.

Ms. Brensley testified that she engaged the services of Joseph Bronske to collect signatures on her nomination papers in connection with her candidacy for the Republican nomination for Lieutenant Governor. Ms. Brensley had begun to hear that there may be issues with signatures that

were being collected by Mr. Bronske, the individual Ms. Brensley engaged to collect her nomination paper signatures, which prompted her to make an inquiry to the Massachusetts State Republican Party as to whether Mr. Bronske had “run any voter list” and if so, to receive a copy of whatever he had run. In response to her inquiry, Ms. Brensley received a copy of a spreadsheet titled “all Weymouth voters,” which is the same list exported by Mr. Bronske on April 30, 2026. Following receipt of the Weymouth voter list, Ms. Brensley compared the list to the names of voters appearing on her nomination papers that had been collected by Mr. Bronske.

Ms. Brensley testified that she found the names on her nomination papers to be in the exact same order as they appeared in the spreadsheet. Ms. Brensley had knowledge that Mr. Bronske was circulating nomination papers for other Republican candidates, including the Respondent. Ms. Brensley testified that she reviewed the Respondent’s nomination papers and observed that many, if not all, of the names appearing on her nomination papers and the Respondent’s nomination papers were identical to list given to Mr. Bronske.

Ms. Brensley testified that not only were the names of voters on her nomination papers identical to the names appearing on the Bronske voters list, but the same names on both sets of nomination papers were written in the exact same order on the numerous nomination papers submitted to the Weymouth Town Clerk that she reviewed.

Ms. Brensley further noticed that some of the names on her nomination papers, which also appeared on the spreadsheet, were for voters whom had died before the date her nomination papers were circulated for signature collection.

Based on what Ms. Brensley discovered, she did not submit any nomination papers obtained through Mr. Bronske to the Secretary of the Commonwealth, resulting in Ms. Brensley not having a sufficient number of certified signatures to have her name printed on the ballot.

VII. CONCLUSION

The Commission, therefore, finds, rules and concludes that the Objector has met his burden of proof and the Commission sustains the Objectors' challenges to 1,021 of the Respondent's 10,677 signatures on the Respondent's nomination papers. As a result, the Respondent does not have sufficient signatures to have his name printed on the Republican Party Primary ballot and the Secretary is ordered to NOT print the Respondent's name on the primary ballot as a Republican candidate for the office of Attorney General.

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

STATE BALLOT LAW COMMISSION
Docket No. 26-04

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 v.)
 MICHAEL WALSH,)
 Respondent)

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I. INTRODUCTION

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The State Ballot Law Commission (Commission) has jurisdiction to determine whether he satisfies these criteria pursuant to General Laws chapter 55B, section 4.

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On June 16, 2026, a hearing was noticed by the Commission in order to consider preliminary matters. The Commission considered several preliminary matters before hearing the Objection itself, which was continued on June 22, 2026 and June 23, 2026.

A. Respondent's Motion to Dismiss for Lack of Standing

The Respondent filed a Motion to Dismiss on the grounds that the Objector lacks standing. As a basis for this Motion, the Respondent argues that because the Objector is registered in the Democratic Party, he is not eligible to vote in the Republican Primary and since the outcome of the objection does not affect him or his choice for office, he has no standing.

In his Motion, the Respondent cites two cases in which the voter enrollment certificate of the objector was determined invalid for not specifying the objector was of the same party of the sought nomination. Madden v. Secretary, 337 Mass. 758 (1958); Kelley v. State Ballot Law Commission, 316 Mass. 512 (1944). However, the Respondent acknowledges the case law is from a prior version of the statute. As the current language of section 5 of chapter 55B of the General Laws does not specifically require an objector be registered in the same party of the respondent or not enrolled in any party, the Commission **DENIED** the Respondent's Motion to Dismiss on June 10, 2026

B. Respondent's Motions to Dismiss for Lack of Certified Mail

The Respondent filed a Motion to Dismiss the Objection based on the grounds that the Objector failed to mail a copy of his Objection by registered or certified mail, return receipt requested, as set out in G.L. c 55B, § 5 paragraph 9. This paragraph states, in part, that failure to do so shall invalidate any objection filed with the Commission. The Commission's regulations provide that "[n]ot later than the day after the objection is filed the objector shall mail a copy of the

objection to the respondent by registered or certified mail return receipt requested.” 950 CMR 59.02(4)(a).

The Objector acknowledged that the Objection was not sent by registered or certified mail, return receipt requested. The Objector presented an affidavit from an agent of the Objector, John Alexander Bausch, indicating that this agent was tasked with the responsibility to mail the Objection first class certified with a return receipt requested. Mr. Bausch’s affidavit indicates that he went to a United States Postal Service office and left the Objection with a postal clerk requesting that the Objection be mailed first class certified with a return receipt requested.¹ Mr. Bausch left the office without confirmation that the Objection was properly mailed. In the Respondent’s Motion to Dismiss, the Respondent acknowledged receiving the Objection via email and regular first class mail.

Accordingly, the Commission finds that the Objection was not mailed by registered or certified mail return receipt requested as set out in section 5 of chapter 55B of the General Laws, paragraph 9 and 950 CMR 59.02(4)(a). However, the Commission declines to grant the Motion to Dismiss based on a failure to meet the statutorily prescribed mailing requirement where actual, timely receipt of the Objection occurred, and no prejudice was demonstrated by the Respondent.²

The Commission is statutorily charged with the responsibility, as gatekeeper of ballot access, to ensure that access to the ballot is gained in a manner and process consistent with the overall statutory and constitutional standards and requirements relating to election laws and access to the ballot.

Consistent with this charge, the Commission further finds that the lack of a certified mailing

¹ The Respondent further argues that that Objector lied on the certificate of service by signing under the penalty of perjury that a copy of the Objection had been sent via certified mail. The Commission finds that the Objector intended and attempted to send via certified mail and therefore rejects this argument.

² The Commission stresses that its determination with regard to this portion of its Decision is based solely on the individual facts particular to this case. This determination is by no means intended to abrogate the statutory and regulatory notice requirements relating to the filing of objections.

had no adverse consequences whatsoever relating to the Respondent's defense of the claims made in the Objections at issue. The Respondent received a copy of the Objection via e-mail from the Objector on June 4, 2026, a day after it was filed with the Commission but a day before the deadline to file an objection. The Respondent also received the Objection from the Secretary of the Commonwealth via e-mail on June 3, 2026, the same afternoon as it was filed. Hence, the electronic notice of the Objection was received well in advance of when the Objection would have been received if only sent by certified or registered mail.

There is no claim that the Respondent was prejudiced in any way by the Objector's careless mailing. The Respondent argues that solely because of this mailing misstep, automatic dismissal is required under G.L. c 55B, § 5 paragraph 9 (and 950 CMR 59.02(4)(a) based on Section 5) which states, in part, "failure to do so [mail by registered or certified mail] shall invalidate any objections filed with the Commission."

As noted, Respondent does not and cannot claim that the lack of proper certified mailing created prejudice or other harm to him. Instead, it is a literal application of the specific wording of the statute upon which Respondent relies-- that mailings not made by certified mail "shall" invalidate the objection. It is the Respondent's position that this language is mandatory and requires an automatic dismissal of the Objection. The Commission does not agree first based on the well-recognized ability of agencies of the Commonwealth to excuse prescriptive service requirements where actual, timely service is proved. Cinder Prods. Corp. v. Schena Const. Co., 22 Mass. App. Ct. 927, 928 (1986). And, second, within the arguably heightened standards of ensuring the integrity of elections and access to the ballot, the Commission has authority to interpret its enabling statute, including the treatment of mandatory, statutory requirements, in a manner that does not contravene the legislative purposes of the election laws. Swift v. Board of Registrars of Voters of Quincy, 281 Mass. 271, 276 (1932). "The word 'shall' as used in statutes, although in its common

meaning mandatory, is not infrequently construed as permissive or directory in order to effectuate a legislative purpose.” Swift at 276.

The word “shall” is used throughout the election laws, but it must be interpreted in a manner that facilitates the legislative intent and purpose of the laws, to have free and fair elections, that are also free from fraud. “It is an aid to interpretation to establish tests by which to measure legislative intent. But all such tests must yield to the underlying aim of all statutory interpretation which is to discern the legislative intent disclosed by the enactment as an entirety in light of its dominant purpose and to declare its appropriate application to particular facts. The regnant design of all election laws is to provide expeditious and convenient means for expression of the will of the voters free from fraud. The right to vote is a precious personal prerogative to be sedulously guarded.” Arts. 4, 7, 8, 9 of the Declaration of Rights. “The public welfare demands that elections be protected from fraud.” Swift at 276 and 277.

The Objector concedes and the record demonstrates that the Objection was not filed as prescribed in the statute. At the same time, the record before the Commission pertaining to the Motion to Dismiss shows that the Objection was received by the Respondent in a timely manner, if not timelier than had only the statutorily prescribed process been followed. The “proof of service” that certified or registered mail is intended to provide was met here but through multiple other means. Cinder Prods. Corp. v. Schena Const. Co., 22 Mass. App. Ct. 927, 928 (1986); Mullane v. Central Hanover Bank & Trust Co., 339 U.S. 306 (1950). Receipt of the Objection is not in question, and the Respondent has not demonstrated prejudice even considering the parameters of the truncated Objection process where timely notice remains paramount. Further, the Commission’s recognition of service in the instant case in a form different from the statutory prescribed process is also consistent with the Commission’s authority to interpret the requirements governing Objections, including the treatment of the term “shall” as permissive, in a manner

consistent with the legislative purpose of the Commission as recognized by the courts “to provide expeditious and convenient means for expression of the will of the voters free from fraud.” Swift at 277. The Commission may only investigate allegations regarding the legality, completeness and accuracy of nomination papers upon the presentation of an Objection. Accordingly, the Commission will not dismiss an objection where it was properly and timely filed with this body and actual, timely service was effectuated to the Respondent without prejudice.

Respondent’s Motion to Dismiss for lack of certified mailing is **DENIED**.

C. **Respondent’s Motion to Dismiss for Failure to Timely File and Disclose the List of Challenged Signatures**

The Respondent filed a third Motion to Dismiss based on the grounds that the Objector failed to file and deliver a detailed list of all challenged signatures “showing” the page and line where each signature is located “[n]ot later than the third weekday before the date of the hearing,” which, in this case, was by June 11, 2026. Respondent objected on the grounds that the list was received via e-mail from the Objector after 5:00 p.m. on June 11, 2026 and suggests that it was not timely filed with the Commission. The record shows that the list was timely filed by hand with the Commission before 5:00 p.m. on June 11, 2026. Further, the Respondent argues that the list received was insufficient as it did not include a “key to the page numbers,” and that the Objector did not provide copies of the nomination papers on which the challenged signatures appeared.

The Commission’s regulations, 950 CMR 59.04(1)(f), state in pertinent part:

“Not later than the third weekday before the date of the hearing contained in the Secretary’s notice, the objector shall file and cause to be delivered to the respondent a list of all signatures on the respondent’s nomination paper or petition which are drawn in question by the objection, showing the page and line where each is located, and the reason why each is alleged to be improper.”

The Commission’s cases require automatic dismissal, or in this case, exclusion of signatures not supplied in a timely fashion, since the failure to supply such information “affects” the

respondent’s “substantial rights” to prepare his case. Pieroni v. Garron, SBLC 98-6 (June 18, 1998); Schmidt v. Onessimo, SBLC 86-2 at 2 (June 16, 1986); Harvey v. Turo, SBLC 82-3 (June 10, 1982). The Commission requires strict adherence to its notice and its discovery regulations. Hurst v. O’Connor, SBLC 98-2 (remand decision, June 26, 1998) (signatures raised at hearing, where objector failed to include signatures in Objector’s List of Challenged Signatures were not properly before the Commission). The Commission has long held that compliance with the 950 CMR 59.04(1)(f) is mandatory.

The Commission finds that the Objector timely filed and caused to be delivered their lists of challenged signatures showing the page and line where they appear on the nomination papers filed with the Secretary, with the stated reason why the signatures were being challenged.

The Respondent claims the filed list was defective on the grounds that it did not provide copies of the actual pages where the challenged names appeared or any of the actual names of the voters who were being challenged. Such disclosures are not required by the regulations.

The Commission further finds that the Objector provided the Respondent with the supplemental information—access to the specific nomination papers identified in the list—on June 12, 2026.³

Accordingly, the Commission finds that the Objectors complied with 950 CMR 59.04(1)(f). Respondent’s Motion to Dismiss for failure to timely file and disclose the list of challenged signatures is **DENIED**.

IV. HEARING

Evidence was received on Tuesday, June 23, 2026. Seven (7) witnesses testified and six (6) exhibits were received. The matter having been heard and after consideration of the pleadings, stipulations, evidence and arguments of the Parties, the Commission finds, rules and concludes as

³ The page and line of the particular challenged signature references the page as numbered the Secretary upon filing and the line number for each signature line on the nomination paper.

set forth in the following sections of this Decision.

V. FINDINGS OF FACT

The Commission finds the following facts:

1. The Respondent, Michael Walsh, is seeking the Republican nomination to the office of Attorney General.

2. To qualify to have his name printed on the ballot, he must have filed 10,000 certified signatures with the Office of Secretary of the Commonwealth by 5:00 p.m. on June 2, 2026.⁴

3. The Respondent filed 10,677 certified signatures with the Office of Secretary of the Commonwealth by 5:00 p.m. on June 2, 2026 as well as the other required paperwork.

4. On June 3, 2026, Adam Roof, a registered voter in the Commonwealth of Massachusetts, filed an objection before the State Ballot Law Commission alleging that some of signatures appearing on the Respondent's nomination papers were written by the same hand, were not legally signed in person by the voter, and some of the signatures were non-genuine and were fraudulently obtained.

5. The Respondent denied the allegations.

6. Aidan Carey, Political Director and Keeper of the Records of the Massachusetts GOP, provided the Commission with a copy of the Numinar database for the Weymouth voter list that was exported by Joseph Bronske on April 30, 2026.

7. Jennifer L. Naso, a forensic document examiner employed by Riley, Welch, LaPorte & Associates, Frankenmuth, MI, since 2011, testified as a forensic handwriting expert. She is a graduate of Yale University and has a Masters in Forensic Science from University of New Haven. Ms. Naso was previously employed as a documents analyst by the United States Secret Service

⁴ Other filing requirements included his written acceptance, an enrollment certificate, a receipt from the State Ethics Commission showing she filed a Statement of Financial Interest with that agency and a receipt from the Office of Campaign and Political Finance showing he filed a statement with that agency regarding spending limits.

from May 2006-2011. The Commission finds her qualified to testify about the matters before the Commission and allows the submission of her Report relating to her observations regarding nomination papers in this case.

8. Ms. Naso examined high resolution images of the Respondent's nomination papers. Ms. Naso concluded, based on her expert opinion, that most of the voter signatures appearing on the Respondent's nomination papers from Weymouth and Scituate were written by the same person.

9. Ms. Naso concluded that 241 certified signatures appearing on thirteen (13) of the Respondent's nomination papers from Scituate were more likely than not written by the same person.

10. Ms. Naso concluded that 690 certified signatures appearing on thirty (30) of the Respondent's nomination papers from Weymouth were more likely than not written by the same person.

11. Ms. Nason concluded that 90 certified signatures appearing on four (4) of the Respondent's nomination papers from Weymouth were more likely than not written by more than one writer, but that the signatures are non-genuine.

12. Ms. Naso further reviewed exemplars of the 780 voters identified in Findings 10 and 11 whose signatures who were certified on the Respondent's nomination papers from Weymouth and concluded that "none of the seven hundred and seventy (770) individuals whose known signatures were submitted for comparison wrote their respective signatures on the disputed petitions."

13. Ms. Naso also compared the voter names appearing on the Respondent's nomination papers from Weymouth to the list of Weymouth voter names and addresses contained in the Numinar database exported by Mr. Bronske. She observed that each of the Respondent's

nomination papers from Weymouth matched portions of the spreadsheet in the order they appear, and concluded “[t]his evidence indicates that the names and addresses on the petitions were copied from the source . . . spreadsheet in the order in which they appear.”

14. Anne Brensley, the endorsed candidate for the Republican nomination for Lieutenant Governor, testified that she engaged the services of Joseph Bronske to collect signatures on her nomination papers in connection with her candidacy for Republican nomination for Lieutenant Governor.

15. Ms. Brensley knew that Mr. Bronske was circulating nomination papers for other Republican candidates, including the Respondent.

16. Ms. Brensley later made an inquiry to the Massachusetts GOP as to whether Mr. Bronske had “run any voter list” and if so, to receive a copy of whatever he had run.

17. In response to her inquiry, Ms. Brensley received a copy of a spreadsheet from the Massachusetts GOP titled “all Weymouth voters,” which is the same list exported by Mr. Bronske.

18. Following receipt of the Weymouth voter list, Ms. Brensley compared the list to the names of voters appearing on her nomination papers that had been collected by Mr. Bronske. Ms. Brensley testified that she found the names on her nomination papers to be in the exact same order as they appeared in the spreadsheet.

19. Ms. Brensley reviewed the Respondent’s Weymouth nomination papers and observed that all the names appearing on her nomination papers and the Respondent’s nomination papers were identical to the list given to Mr. Bronske.

20. Ms. Brensley observed that, not only were the names on her nomination papers identical to the names appearing on the Bronske voters list, but the same names on her nomination papers and the Respondent’s nomination papers were in the exact same order on the numerous nomination papers submitted to the Weymouth Town Clerk.

21. Based on what Ms. Brensley discovered, which she concluded was that the signatures obtained from Mr. Bronske were forged, she did not submit any nomination papers obtained through Mr. Bronske to the Secretary of the Commonwealth. As a result, Ms. Brensley had an insufficient number of certified signatures to have her name printed on the ballot.

22. Harold Hubschman of SignatureDrive.com testified about matters relating to his experience as a signature gatherer for nomination papers and initiative petitions in Massachusetts and other states. Mr. Hubschman has been in the voter signature gathering business for over 31 years. His company has gathered millions of signatures for candidate nominating papers and initiative petitions. The Commission finds him qualified to testify about the matters before the Commission in this action.

23. Mr. Hubschman testified that he was provided with the same Numinar list, which he compared to the names on the Respondent's nomination papers. He also stated that he compared the Respondent's nomination papers with the nomination papers of Anne Manning Martin, Republican candidate for Lieutenant Governor, filed with the Secretary of the Commonwealth, which are public records that the Commission takes judicial notice.

24. Based on his review, Mr. Hubschman concluded that in the Town of Weymouth, there are 665 certified signatures on 29 pages of the Respondent's nomination papers that are in the identical order as on 29 corresponding pages of Anne Manning Martin's nomination papers, with only one deviation. Mr. Hubschman concludes the mathematical likelihood of this occurring is zero and that these signatures are likely fraudulent.

25. The Commission invalidates a total of 1,021 of the Respondent's 10,677 signatures filed with the Secretary of the Commonwealth by June 2, 2026, resulting in 9,656 remaining valid signatures.

VI. ISSUES OF LAW AND CONCLUSIONS

A. Evidentiary Standard Used by the Commission

The Commission’s findings are based on substantial evidence, which is defined as “such evidence as a reasonable mind might accept as adequate to support a conclusion.” G. L. c. 30A, § 1(6) (2024 ed.); Capezzuto v. State Ballot Law Commission, 407 Mass. 949, 952 (1990); Hershkoff v. Registrars of Voters of Worcester, 366 Mass. 570, 574 (1974); Labor Relations Commission v. University Hospital, Inc., 359 Mass. 516, 521; (1971); Almeida Bus Lines, Inc. v. Department of Public Utilities, 348 Mass. 331, 341 (1965).

In proceedings before the Commission, the objector has the burden of going forward. Hamill v. Sawyer, SBLC 90-14 (June 27, 1990). The objector must meet his burden of proof by proving his allegations by a preponderance of the evidence. DeJong v. Owens, SBLC 90-10 (June 22, 1990).

B. Scope of Commission’s Review of Challenged Signatures

Under Massachusetts General Laws, Chapter 53, section 7, “every *voter* signing a nomination paper shall sign in person as registered or substantially as registered” G. L. c. 53, § 7 (2024 ed.). The only exception to this requirement is that a voter who is physically disabled and therefore unable to sign may have another, in his presence, sign his name. G. L. c. 53, § 7 (2024 ed.). The local election officials are limited, in substance, to a comparison of the signature as found on the nomination papers to the names of those persons listed on the official lists of registered voters. McCarthy v. Secretary of the Commonwealth, 371 Mass. 667, 687 (1977); 950 CMR 55.03(1)-(4).

However, unlike the local registrars, the Commission has consistently applied a broad and equitable standard when considering the validity of certified signatures so as to facilitate the will of the voter whenever justice and fairness allow. Auger-Collins v. Callahan, SBLC 90-8 (June 22, 1990); Lam v. Conner, SBLC 90-7 (June 20, 1990). The Commission has applied the standards

analogous to those used by the courts given the nature of Commission proceedings. Id. Like a court, the Commission may receive extrinsic evidence, which the registrars could not, and may declare a signature certifiable in exercising its equitable powers whenever it finds that the signer is an eligible voter of the proper district. Jacobucci v. Kelley, SBLC 90-15 (June 29, 1990); Auger-Collins v. Callahan, SBLC 90-8 (June 22, 1990); Lam v. Conner, SBLC 90-7 (June 20, 1990); McCarthy, 371 Mass. at 684. This principle is bolstered by the consistent judicial policy of resolving voting disputes, where at all possible, in favor of the voter. McCavitt v. Registrars of Voters of Brockton, 385 Mass. 833, 837 (1982). Thus, a voter's signature should be counted unless there is "substantial doubt that the signer was a registered voter . . . eligible to sign a nomination petition." McCarthy, 371 Mass. at 684.

C. Objection Allegations that Certain Nomination Papers Contained Certified Names that are Non-Genuine

The Objector alleges that certain signatures appearing on the Respondent's nomination papers are non-genuine. The Commission has a longstanding practice of reviewing signatures for their authenticity based upon their own comparison of the signatures on the nomination paper or petition with the exemplars contained in the voter registration books, cards, and affidavits of voter registration or other reliable documents containing known signatures put into evidence. See Hannigan v. Board of Appeals, 328 Mass. 366, 370 (1952). While the Commission has considered the expert testimony of handwriting experts and found it helpful, the testimony of such experts is not dispositive. In this case, the Objector alleges that multiple signatures were signed by the same person or persons and that they are non-genuine.

i. Testimony of Forensic Document Examiner Jennifer Naso

The Objector retained the services of Jennifer Naso, a forensic document examiner employed by Riley, Welch, LaPorte & Associates, Frankenmuth, MI since 2011. She is a graduate

of Yale University and has a Masters in Forensic Science from University of New Haven. Ms. Naso was previously employed as a documents analyst by the United States Secret Service from May 2006-2011. The Commission finds her qualified to testify about the matters before the Commission and allows the submission of her Report relating to her observations regarding nomination papers in this case.

Ms. Naso examined high resolution images of the Respondent's nomination papers. The Commission found her qualified to testify about the matters before the Commission and allowed the submission of her Report relating to her observations regarding nomination papers in this case. Ms. Naso concluded, based on her expert opinion, that most of the voter signatures appearing on the Respondent's nomination papers from Weymouth and Scituate were written by the same person.

Ms. Naso concluded that 241 certified signatures appearing on thirteen (13) of the Respondent's nomination papers from Scituate were more likely than not written by the same person. Her conclusions were based on the pictorial similarity in the writing and the low skill level of the writing, which was consistent throughout pages numbered 1 and 3-14 by the Secretary's Elections Division, all of which were from the Town of Scituate. While the Objector also submitted exemplars for each voter as provided by the Scituate Town Clerk's Office to the Commission, Ms. Naso did not review these exemplars. The Commission, having reviewed the nomination papers, exemplars and Ms. Naso's report, agree and invalidate the 241 certified signatures appearing on the Respondent's Scituate nomination papers numbered 1 and 3-14.

Ms. Naso concluded that 690 certified signatures appearing on thirty (30) of the Respondent's nomination papers from Weymouth were more likely than not written by the same person. Her conclusions were based on the lack of variation of the stylization of the signatures, that most were hand printed names instead of signatures, the sequencing of the signatures on the papers

as well as a comparison of the exemplar voter signatures provided by the Weymouth Town Clerk's Office.⁵ Ms. Naso concluded that 90 certified signatures appearing on four (4) of the Respondent's nomination papers from Weymouth were more likely than not written by more than one writer, but that the signatures are non-genuine.

Ms. Naso further reviewed exemplars of the voters whose signatures who were certified on the Respondent's nomination papers from Weymouth and concluded that "none of the seven hundred and seventy (770) individuals whose known signatures were submitted for comparison wrote their respective signatures on the disputed petitions."

As part of her review, Ms. Naso compared the voter names appearing on the Respondent's nomination papers from Weymouth to the list of Weymouth voter names and addresses contained in the Numinar database exported by Mr. Bronske. She observed that each of the Respondent's nomination papers from Weymouth matched portions of the spreadsheet in the order they appear, and concluded "[t]his evidence indicates that the names and addresses on the petitions were copied from the source ... spreadsheet in the order in which they appear."

The Commission, having reviewed the nomination papers, exemplars and Ms. Naso's report, agree and invalidates the 780 certified signatures appearing on the Respondent's Weymouth nomination papers numbered 15-49.

ii. Testimony of Signature Gathering Expert Harold Hubschman

The Objector presented testimony from a signature gathering expert, Harold Hubschman. Mr. Hubschman was provided a copy of the so called "Numinar list of Republican and unenrolled voters maintained by the Republican State Committee." He was also provided with the nomination papers the Respondent submitted to the Weymouth Town Clerk's Office and thereafter filed with the Secretary of the Commonwealth. Mr. Hubschman also reviewed digital copies of the

⁵ The sequencing of the names refers to voters who share the same address are not sequential and therefore do not logically align.

nomination papers submitted by the Republican Lieutenant Governor candidate Anne Manning Martin to the Weymouth Town Clerk's office and thereafter filed the Secretary of the Commonwealth's Office. Based on his review of both sets of nomination papers from Weymouth, he, like Ms. Naso, found twenty-nine (29) pages of the Respondent's nomination papers in the exact same order as candidate Anne Manning Martin. In addition to being identical on both sets of papers, they are listed in the same order as they appear in the Numinar database of Weymouth registered voters. The Respondent's nomination papers reviewed by Mr. Hubschman were numbered 15-49 by the Secretary of the Commonwealth's Elections Division. Based on this review, he concluded that the petitions exhibit overwhelming signs of fraud.

The Respondent provided testimony from two (2) witnesses regarding the Respondent's signature collection process. The first witness, Carol Mietzsch, testified that she worked on the Respondent's campaign and received the certified nomination papers and reviewed them only to ensure they were properly marked by the local election officials. She testified that she did not review the names or signatures on any nomination papers. The second witness was Paul Burke, who testified that he helped collect signatures for the Respondent and worked with Mr. Bronske. His testimony was not specific to the Respondent's nomination papers in question and instead more general about his experience in collecting signatures for various candidates, including Anne Manning Martin. The Commission did not find value in their testimony.

ii. Testimony of Anne Brensley

Anne Brensley is a candidate for the Republican nomination for Lieutenant Governor. Ms. Brensley received the Party's nomination at its State Convention.

Ms. Brensley testified that she engaged the services of Joseph Bronske to collect signatures on her nomination papers in connection with her candidacy for the Republican nomination for Lieutenant Governor. Ms. Brensley had begun to hear that there may be issues with signatures that

were being collected by Mr. Bronske, the individual Ms. Brensley engaged to collect her nomination paper signatures, which prompted her to make an inquiry to the Massachusetts State Republican Party as to whether Mr. Bronske had “run any voter list” and if so, to receive a copy of whatever he had run. In response to her inquiry, Ms. Brensley received a copy of a spreadsheet titled “all Weymouth voters,” which is the same list exported by Mr. Bronske on April 30, 2026. Following receipt of the Weymouth voter list, Ms. Brensley compared the list to the names of voters appearing on her nomination papers that had been collected by Mr. Bronske.

Ms. Brensley testified that she found the names on her nomination papers to be in the exact same order as they appeared in the spreadsheet. Ms. Brensley had knowledge that Mr. Bronske was circulating nomination papers for other Republican candidates, including the Respondent. Ms. Brensley testified that she reviewed the Respondent’s nomination papers and observed that many, if not all, of the names appearing on her nomination papers and the Respondent’s nomination papers were identical to list given to Mr. Bronske.

Ms. Brensley testified that not only were the names of voters on her nomination papers identical to the names appearing on the Bronske voters list, but the same names on both sets of nomination papers were written in the exact same order on the numerous nomination papers submitted to the Weymouth Town Clerk that she reviewed.

Ms. Brensley further noticed that some of the names on her nomination papers, which also appeared on the spreadsheet, were for voters whom had died before the date her nomination papers were circulated for signature collection.

Based on what Ms. Brensley discovered, she did not submit any nomination papers obtained through Mr. Bronske to the Secretary of the Commonwealth, resulting in Ms. Brensley not having a sufficient number of certified signatures to have her name printed on the ballot.

VII. CONCLUSION

The Commission, therefore, finds, rules and concludes that the Objector has met his burden of proof and the Commission sustains the Objectors' challenges to 1,021 of the Respondent's 10,677 signatures on the Respondent's nomination papers. As a result, the Respondent does not have sufficient signatures to have his name printed on the Republican Party Primary ballot and the Secretary is ordered to NOT print the Respondent's name on the primary ballot as a Republican candidate for the office of Attorney General.