

Exhibit A



Bay Head GOP
P.O. Box 164
Bay Head, NJ 08742
BayHeadGOP@gmail.com
BayHeadGOP.com

August 21, 2026

Ocean County Board of Elections
129 Hooper Avenue
Toms River, New Jersey 08753

Ocean County Clerk
118 Washington Avenue
Toms River, New Jersey 08753

MAIL

OC ELEC BD
SEP 1 '26 PM 3:27

Dear County Clerk/Board of Elections Chair,

We have sufficient reason to believe that the individuals on the attached list should not be voting in Bay Head. Currently, these individuals have their tax bills being sent to addresses outside of Bay Head, indicating that they could potentially be ineligible to vote here. If, in fact, they are living the majority of the year at a different location, we feel they should be voting in the municipality where they receive their tax bills.

We would appreciate you looking into this matter and removing any individuals not found to be eligible to vote in Bay Head removed from the voter rolls here. Thank you for your time and attention to this matter.

Respectfully,

Dennis J. Shaning, PhD
Bay Head GOP President
Bay Head Council President

Tier	Last Name	First Name	Middle	Party	DOB	Registered Address	Apt/Unit	Owner of Record	Tax Bill Mailing Address
	ROBERTSON	HEATHER	E	UNA					NO ARLINGTON NJ 07032
				UNA					BAYVILLE NJ 08721
				DEM					NEW YORK, NY 10280
				UNA					NEW YORK, NY 10013
	COLBY	SCOTT	J	UNA					CLARK, NJ 07066
				DEM					MADISON NJ 07940
				DEM					MADISON NJ 07940
	DRAESEL	ADA	M	DEM					CONCORD, MA 01742
				UNA					WESTFIELD NJ 07090
				UNA					NEW YORK, NY 10036
				DEM					PRINCETON, NJ 08540
				UNA					CHATHAM, NJ 07928
				DEM					PRINCETON NJ 08540
				UNA					PRINCETON NJ 08540
				DEM					PRINCETON NJ 08540
				UNA					PRINCETON NJ 08540
				UNA					SUMMIT, NJ 07901
				UNA					SUMMIT, NJ 07901
				DEM					W STAMFORD, CT 06907-1319
				UNA					MORRISTOWN, NJ 07960
				DEM					NEW YORK, NY 10024
				UNA					BRICK NJ 08724
				UNA					BRICK NJ 08724
				DEM					CRESTWOOD, NY 10707
				UNA					CRESTWOOD, NY 10707
				UNA					CHERRY HILL, NJ 08034
				UNA					WYCKOFF NJ 07481
				UNA					WYCKOFF NJ 07481
				UNA					WYCKOFF NJ 07481
				DEM					SYKESVILLE, MD 21784
				UNA					ARLINGTON, VT 05250
				UNA					BONITA SPRINGS, FL 3413
				UNA					NEW YORK, NY 10022
				UNA					WOODBRIDGE, NJ 07095
				UNA					WOODBRIDGE, NJ 07095
				UNA					COLTS NECK NJ 07722
				DEM					JACKSON NJ 08527
				UNA					JACKSON NJ 08527
				DEM					CHARLESTON SC 29403

Exhibit B

PO Box 2006
129 Hooper Ave.
Toms River NJ, 08754-2006



(732) 929-2167
Fax: (732) 506-5110
1-800-452-5254

September 15, 2026

[REDACTED]
Bay Head, NJ 08742

Dear [REDACTED]

A question has arisen regarding your domicile or residence as it relates to your right to vote in Ocean County. In order that the Board of Elections, in its capacity as the County's Commissioner of Registration, to properly determine your legal domicile, we have sent you the attached Domicile Questionnaire. Kindly fill in the requested information (with copies of documentation, where applicable) and return the form in the enclosed self-addressed, stamped envelope. You may also fax the documents to our office at (732) 506-5110 or email them to, or Susanne Dyer at Sdyer@oceancounty.nj.gov or Chris Patterson at Cpatterson@oceancounty.nj.gov.

We request that you return the Questionnaire by **Wednesday, Sept 30, 2026**. The Commissioners of the Board of Elections have a scheduled meeting for Tuesday, October 13, 2026.

The Commissioners will review your Domicile Questionnaire, submitted documents and written statements to determine your eligibility to vote in Ocean County. You are invited to attend this meeting and provide any additional information for their consideration. Please confirm your attendance or your intention to participate by phone by Friday, October 9, 2026.

If we do not hear from you by that date, your right to vote may be challenged for the November 3, 2026 General Election and future elections. If you wish to discuss the matter or have any questions, you can call Susanne Dyer at (732) 929-2058, or Chris Patterson at (732) 929-2170. If you wish to be removed as a registered voter in Ocean County, please complete the attached Letter of Removal.

Thank you for your attention to this extremely significant matter.

Very truly yours,

George Gilmore, Chairman
Ocean County Board of Elections

Exhibit C

OCEAN COUNTY BOARD OF ELECTIONS

DOMICILE QUESTIONNAIRE

HEATHER E ROBERTSON
BAY HEAD NJ 08742-5008

1. a. List your home address _____

b. How long have you resided at the above address? _____

c. On a weekly basis, how much time do you spend at the above address? _____

2 a. Do you rent or own the property? _____

b. If you own the property, do you file for a homestead rebate from that address? _____

(If yes, supply a copy of your latest rebate tax form blocking out social security numbers and financial information, if available)

3 a. Do you own or rent any other property besides the one listed above? _____

If, so, provide all addresses: _____

b. If the answer to 3a is yes, do you live at any of the above addresses? _____

c. If yes, specify the amount of time you live at the addresses listed in 3b _____

d. Do you file a homestead rebate for any address listed on 3a? _____

(Provide a copy of form(s) blocking out social security numbers and financial information, if available)

4. Do you reside at any other address besides the ones listed above, in which you do not rent or own the property? _____

If so, provide all addresses: _____

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5. a. If you are employed, name and address of your employer: _____
b. At what address are you listed with your employer? _____
6. Are you registered to vote from any other address in this state or any other state?
If yes, list the address(s): _____
7. List the address you use for federal income tax purposes:
(If available, provide a copy of latest return blocking out social security numbers and financial information)
8. List the address used for state income tax purposes:
(If available, provide a copy of latest return blocking out social security numbers and financial information)
9. List the address used for social security purposes: _____
10. a. If you own an automobile(s), provide the address listed on the registration for each car owned: _____
b. If you own a boat, provide the address listed on the registration: _____
11. If you have a driver's license, please provide the address listed, the license number and the latest date of issuance of the license: _____
12. If you have car insurance, provide the address listed on all insurance policies: _____
13. Provide the address you use for purposes of receiving mail: _____

-3-

14. Provide the address used for any legal documents besides the ones listed above:
i.e. wills, trust deeds, etc. _____

15. If you have children of school age, please list the name(s) and address(es) of the
schools they attend: _____

16. If you have children, list their addresses: _____

COMMENTS SECTION

If you wish to elaborate on any of the above responses or provide additional
information, please do so below.

I hereby certify that the foregoing information is true.

Signature of Voter

Exhibit D

PO Box 2006
129 Hooper Avenue
Toms River NJ 08754-2006



(732) 929-2167
Fax (732) 506-5110
1 (800) 452-5254

Ocean County Board of Elections

REQUEST TO BE REMOVED FROM VOTER FILES

Name: _____

Address: _____

Dear Voter;

If you wish to be removed from the active voter registration rolls in Ocean County, please complete and sign the affirmation below and mail it back in the self-addressed envelope. This will enable the Board of Elections to process your request. *(Please note that a Power of Attorney cannot sign for you.)*

Very Truly Yours,

Wyatt Earp, Secretary Commissioner

Stamp

AFFIRMATION: I do hereby request the Ocean County Board of Elections to remove my name from the active voter-roles. Please check off one of the following:

- _____ *I no longer live in New Jersey*
 _____ *I no longer live in Ocean County*
 _____ *I wish to be removed from the Voter File for other reasons*

Original Signature or Mark of Voter (*A Power of Attorney cannot sign for voter.*)

_____ Date

Print Voter's Name

_____ Date of Birth

Current Street Address

Apt #

Town

Zip

If assistance was provided to the voter while filling out this form, please complete and sign below:

Printed Name of Assistor

Signature of Assistor

_____ Date

Exhibit E

LEAGUE OF WOMEN VOTERS OF
NEW JERSEY, SCOTT COLBY, ADA
DRAESEL, and HEATHER
ROBERTSON,

Plaintiffs,

v.

THE OCEAN COUNTY BOARD OF
ELECTIONS and GEORGE GILMORE,
in his capacity as Chairman of the Ocean
County Board of Elections,

Defendants.

**SUPERIOR COURT OF
NEW JERSEY
CHANCERY DIVISION
MERCER COUNTY**

Civil Action

CERTIFICATION OF JESSICA BURNS

I, Jessica Burns, hereby certify the following:

1. I have personal knowledge of the matters in this certification, and this is what I would testify to if called as a witness in Court.
2. I am over eighteen years of age and am otherwise competent to testify.
3. I am a resident of and registered voter in Monmouth County, New Jersey.
4. I am the Executive Director of the League of Women Voters of New Jersey (“LWVNJ”). I have held this position since 2016.
5. LWVNJ is a nonpartisan statewide non-profit organization that was founded in Newark in April 1920. LWVNJ, currently headquartered in Trenton,

includes independently incorporated 501(c)(3) and 501(c)(4) organizations and is a state affiliate of the League of Women Voters.

6. LWVNJ and its members are dedicated to helping the people of New Jersey exercise their right to vote as protected by the law. LWVNJ encourages informed and active participation in government, works to increase understanding of major public policy issues, and seeks to influence public policy through education and advocacy. LWVNJ is a predominantly volunteer organization and has 30 member chapters around the state, including in Ocean County.

7. LWVNJ has approximately 1,597 individual members, many of whom are registered voters and regularly vote in state and federal elections. LWVNJ has active members in Ocean County and nearly every county in New Jersey.

8. LWVNJ's mission is to empower voters and defend democracy, including through voter registration, education, and get-out-the-vote efforts. During every election cycle, LWVNJ conducts voter-registration drives, historically staffs nonpartisan voter-registration tables at naturalization ceremonies, educates incarcerated and formerly incarcerated individuals about their voting rights, staff a voter assistance hotline, and works with local high schools and universities to register young voters. It also maintains an online database called VOTE411, a nonpartisan and free digital voter resource with information available in both

English and Spanish, including registration information, voter guides, mail-in ballot information, candidate information, polling rules and locations.

9. These voter engagement efforts can be successful only if eligible New Jerseyans trust that they will not be improperly challenged or disenfranchised. Our work to educate, assist, and empower voters is significantly impaired when voters are fearful about exercising their rights.

10. This work is also inhibited by voter confusion. When advocacy groups or election officials spread inconsistent, false, or misleading information about voter eligibility, voters are deterred from participating in elections.

11. LWVNJ's mission is also impacted when voters are forced to undertake burdensome and complex procedures in order to vote (including being required to re-register), or when voters are prevented from voting entirely, because supporting these voters requires additional investments of our time and resources.

12. If the Ocean County Board of Election's public challenge process is allowed to go forward, election officials and private actors across the state will see a green light to engage in similar tactics to dissuade or prevent voters from registering or casting ballots based on their party affiliation or other reasons.

13. LWVNJ members who receive their tax bills at mailing addresses separate from their registered addresses and members who have political affiliations that don't align with views that predominate among local officials will be

particularly chilled. These members, and indeed all LWVNJ members, have reason to fear violations of their voting rights if the challenge process is not stopped.

14. I certify that the foregoing statements are true and am aware that if any of the above statements are willfully false, I will be subject to punishment.

Dated: October 7, 2026

A handwritten signature in black ink that reads "Jesse Burns". The signature is written in a cursive, slightly slanted style. Below the signature is a horizontal line.

Jessica Burns

Exhibit F

LEAGUE OF WOMEN VOTERS OF
NEW JERSEY, SCOTT COLBY, ADA
DRAESEL, and HEATHER
ROBERTSON,

Plaintiffs,

v.

THE OCEAN COUNTY BOARD OF
ELECTIONS and GEORGE GILMORE,
in his capacity as Chairman of the Ocean
County Board of Elections,

Defendants.

**SUPERIOR COURT OF
NEW JERSEY
CHANCERY DIVISION
MERCER COUNTY**

Civil Action

CERTIFICATION OF SCOTT COLBY

I, Scott Colby, hereby certify the following:

1. I have personal knowledge of the matters in this certification, and this is what I would testify to if called as a witness in Court.
2. I am over eighteen years of age and am otherwise competent to testify.
3. I am a full-time resident of and registered voter in Bay Head, New Jersey.
4. I grew up, went to school, and met my wife in Bay Head, New Jersey.
5. Although I later moved to Madison, New Jersey, my wife and I decided to retire in Bay Head late last year.

6. We therefore once again made Bay Head our official, full-time residence.

7. We sold our home in Madison and updated the address on our licenses, bank accounts, insurance policies, and voter registration cards to the one associated with our new home in Bay Head.

8. I previously received tax bills in Madison, New Jersey before I moved to Bay Head.

9. My wife and I both received a letter from George Gilmore and the Ocean County Board of Elections.

10. When I initially received the letter, I felt dismayed, annoyed, and upset, particularly because it became clear that Dennis Shaning, a neighbor of mine and a member of my sailing club, had given our names to Mr. Gilmore.

11. My initial dismay aside, I felt I had no choice but to fill out the Domicile Questionnaire to ensure that I was not disenfranchised.

12. Filling out the questionnaire took many hours over several days. I had to find several documents, make copies of them, and purchase black pens to redact financial data.

13. I felt particularly uncomfortable providing the Board of Elections with my tax returns, which contain highly sensitive information, like my financials and

my Social Security number. I had to figure out how to appropriately redact these documents before submitting them.

14. I feel as though I have no choice but to attend the meeting on October 13, 2026 because I do not trust that I will be able to vote in the general election if I don't.

15. While I am determined to vote on November 3, 2026, I fear that the Board may place additional hurdles in my way at the polls, including by forcing me to vote on a provisional ballot. The process of voting provisionally seems confusing. I also worry that I may just not be able to vote at all.

16. I know others who received the same letter from the Board of Elections and Mr. Gilmore, particularly those with significant personal and employment-related obligations, who are unable to meet the Board's demands and thus feel forced to effectively forfeit their right to vote this November.

17. I know several elderly members of the Bay Head community who received the letter. From my understanding, they may be simply too scared to even try to vote in this November's election because they fear they will get in trouble or be subjected to embarrassment or other additional demands in public in view of their community.

18. I certify that the foregoing statements are true and am aware that if any of the above statements are willfully false, I will be subject to punishment.

Dated: 10/07/2026

Scott Colby
Scott Colby (Oct 7, 2026 20:52:36 EDT)

Scott Colby

Exhibit G

LEAGUE OF WOMEN VOTERS OF
NEW JERSEY, SCOTT COLBY, ADA
DRAESEL, and HEATHER
ROBERTSON,

Plaintiffs,

v.

THE OCEAN COUNTY BOARD OF
ELECTIONS and GEORGE GILMORE,
in his capacity as Chairman of the Ocean
County Board of Elections,

Defendants.

**SUPERIOR COURT OF
NEW JERSEY
CHANCERY DIVISION
MERCER COUNTY**

Civil Action

CERTIFICATION OF ADA DRAESEL

I, Ada Draesel, hereby certify the following:

1. I have personal knowledge of the matters in this certification, and this is what I would testify to if called as a witness in Court.
2. I am over eighteen years of age and am otherwise competent to testify.
3. I am a full-time resident and registered voter in Bay Head, New Jersey.
4. I am 84 years old and I live by myself.
5. My late husband and I bought our first house in Bay Head about 53 years ago. We started living in Bay Head full time roughly 25 years ago.

6. Bay Head is my community. My late husband was an episcopal priest, and I am very involved in my local church, All Saints Bay Head. I know almost everyone in town.

7. My tax bills are sent to the home of my daughter and son-in-law in Concord, Massachusetts. They manage the bills for me.

8. Voting is very important to me. I don't think I have missed an election. I have always been a registered Democrat.

9. When I received the letter from the Ocean County Board of Elections raising questions about my voter registration, I was totally dumbfounded. I had no idea what it meant. I remember there were a lot of documents and forms. I was confused and nervous.

10. It was so overwhelming that I gave everything to my son-in-law. I hope he'll be able to help me but I don't know what he plans to do.

11. I know the County Board of Elections has scheduled a meeting for October 13th to make decisions related to the letter, but I already had plans to visit my daughter and son-in-law in Massachusetts that week so I can't attend.

12. Since I don't know what my son-in-law plans to do with the questionnaire and I can't attend the meeting, I'm worried my right to vote could be at risk. I really don't know what will happen during the process.

13. I've now received several copies—probably five or six—of the same letter from the Ocean County Board of Elections. It's upsetting each time they arrive. I feel like I'm being harassed.

14. On October 6, 2026, shortly after 5:00 pm, I even got a call from someone who I believe was from the Ocean County Board of Elections Office. The person was asking for personal information about where I live. It made me very uneasy. I decided not to pick up if they call again.

15. I've gone to the same polling place, year after year, for decades, and now I'm being questioned about my eligibility. I am stunned. I am undone by it. It makes me wonder about the right to vote—what it means, and whether it is really protected.

16. I certify that the foregoing statements are true and am aware that if any of the above statements are willfully false, I will be subject to punishment.

Dated: 10/08/2026


Ada draesel (Oct 8, 2026 12:27:35 EDT)

Ada Draesel

Exhibit H

LEAGUE OF WOMEN VOTERS OF
NEW JERSEY, SCOTT COLBY, ADA
DRAESEL, and HEATHER
ROBERTSON,

Plaintiffs,

v.

THE OCEAN COUNTY BOARD OF
ELECTIONS and GEORGE GILMORE,
in his capacity as Chairman of the Ocean
County Board of Elections,

Defendants.

**SUPERIOR COURT OF
NEW JERSEY
CHANCERY DIVISION
MERCER COUNTY**

Civil Action

CERTIFICATION OF HEATHER ROBERTSON

I, Heather Robertson hereby certify the following:

1. I have personal knowledge of the matters in this certification, and this is what I would testify to if called as a witness in Court.
 2. I am over eighteen years of age and am otherwise competent to testify.
 3. I am 57 years old and am a full-time resident of and registered voter in Bay Head, New Jersey.
 4. I have been connected to Bay Head, New Jersey for my entire life.
- After coming here during the summer for 33 years, I moved here full-time. I have now lived and voted in Bay Head full-time for 24 years.

5. My license, voter registration card, health insurance policy, and car insurance forms all list my Bay Head address.

6. I have been very involved in the Bay Head community. I was appointed by the current mayor to serve as a member of the town's planning board. I have also been appointed to be a member of the town's environmental commission.

7. I am also engaged in Bay Head's business community. I am a partner in a small communal needlepoint shop called Bay Head Needlepoint. While this role is not my primary employment, I do it because I enjoy being involved in the Bay Head community.

8. As a result of my town service and community presence, I am quite well-known in Bay Head. On a recent occasion of a medical emergency at my home, the Chief of Police himself accompanied the emergency response after recognizing the address of the emergency as mine.

9. Indeed, I personally know the Bay Head GOP President—Dennis Shaning—who apparently crafted the initial list of voters that includes me. I have been in his house and worked to get him elected to Bay Head's Town Council.

10. Mr. Shaning knows for a fact that I live in Bay Head and have lived here for a very long time. He made a conscious choice to include me on that list

anyway. In fact, I'm listed first. He knows several of the people on that list personally.

11. Because I take voting seriously, I have always registered to vote where I live. The only times I voted via mail or absentee ballot were when I was in college and during the COVID-19 pandemic.

12. My property tax bill used to be delivered to an address in North Arlington, New Jersey. That address is connected to my parents' former home.

13. After my mother's passing, I went to Borough Hall and actually changed my tax address to my home in Bay Head. I had done this before I received Mr. Gilmore's letter.

14. When I received the letter from the Ocean County Board of Elections, I was taken aback. The letter did not indicate that it was prompted by a mismatch between my tax address and my home address. The letter only indicated that the Board had "significant reason" to question my right to vote in Bay Head. I found that language very aggressive.

15. I completed and mailed back the Domicile Questionnaire because I am determined to vote in the November general election. I sent the Questionnaire via USPS Priority Mail because I wanted a tracking number and delivery notification.

16. I happened to have a lockbox/firebox that I have kept for nearly 30 years that includes among its contents four old licenses, all with Bay Head, New Jersey addresses; old passports; my car registration in Bay Head; and other important documents, including my car insurance policy, Social Security card, and New Jersey voter registration card.

17. I copied these documents so I could submit them with my Domicile Questionnaire.

18. I even made copies of my dog's medical prescriptions because I was so determined to prove to the Board that I am a Bay Head resident.

19. That said, I did not send the Board of Elections my tax returns. This was a conscious choice. I did not want them to have that private information.

20. While I feel annoyed that my right to vote is being interfered with, I still plan on voting in November. I know I am legitimately registered to vote in Bay Head and plan to vote in accordance with that belief.

21. I do worry that I will be forced to vote on a provisional ballot when I go to the polls on November 3, 2026. I've seen people vote provisionally before, and it's always been a really big mystery to me whether their votes actually get counted. The voters I've seen have had to step aside and fill out a form. It seems like a more burdensome process than just voting normally.

22. I have not decided whether I will attend the Board's meeting on October 13, 2026. Because the meeting is at 2pm, I would have to take off work for part of a day in order to go.

23. I personally know Republicans who have their tax bills mailed outside Ocean County but who did not receive this letter from the Ocean County Board of Elections.

24. I certify that the foregoing statements are true and am aware that if any of the above statements are willfully false, I will be subject to punishment.

Dated: 10/08/2026


Heather Robertson (Oct 8, 2026 07:43:38 EDT)

Heather Robertson