

## ***COLORADO DECISION SHOWS HOW THE RIGHT TO VOTE FREELY HAS DECLINED SINCE THE 18<sup>th</sup> CENTURY***

On December 19, the Colorado Supreme Court ruled that former President Donald Trump cannot appear on the state's Republican presidential primary ballot. *Anderson v Griswold*, 2023-CO-63. Furthermore, write-in votes for him cannot be counted.

The decision underscores the extent to which a voter's right to vote for anyone he or she pleases has eroded since the United States became an independent nation. The basis for the decision is that Trump had previously signed an oath to support the Constitution and yet then engaged in insurrection. The Fourteenth Amendment, Section Three, bars such persons from holding office.

The decision does not discuss the point that when Section Three was written, the government had no ability to prevent any voter from voting for any candidate, because ballots were private; they weren't prepared by any governmental body. That is why Section Three does not say an insurrectionist cannot be elected; it says he or she cannot hold the office. Presumably the authors of Section Three (assuming they really did mean the provision to apply to presidential candidates, which is not entirely clear) assumed that if an insurrectionist were elected by the electoral college, Congress would refuse to count the votes for that candidate. The section does say that Congress, by a two-thirds vote of each house, can remove the prohibition for any particular person, which shows that the authors assumed Congress would be involved.

Even after government-printed ballots were created at the end of the 19<sup>th</sup> century, state courts almost unanimously believed that it was unconstitutional to prohibit a voter from voting for anyone.

Ironically, even the Colorado Supreme Court held that view in 1912, when it said in *Littlejohn v People ex rel Desch*, 121 P. 159, "Every qualified elector shall have an equal right to cast a ballot for the person of his own selection, and that no act shall be done by any power, civil or military, to prevent it. Such is the mandate and spirit of the (state) Constitution, and it thereby vests in the elector a constitutional right of which he cannot lawfully be deprived by any government power." This case held unconstitutional a state law which forbade write-in votes in School Director elections. The recent Trump decision does not mention the *Littlejohn* precedent.

Back then, even candidates who did not meet the constitutional qualifications to hold the office were permitted to be on the ballot. In 1892, the Prohibition Party nominated James B. Cranfill for vice-president. He was only 33 years old as of the inauguration date. Everyone who was paying attention knew about his age, because he emphasized it, to show that the party represented youth. Every state printed the Prohibition Party ticket on the ballot, with the sole exception of South Dakota, where the state Prohibition Party didn't file to be on the ballot because its officers wanted the Republican ticket to win.

Other State Supreme Courts that issued opinions upholding the right to vote for anyone were California, Florida, Georgia (numerous times), Illinois, Indiana, Iowa, Kentucky, Louisiana, Maryland, Massachusetts, Minnesota, Mississippi, Missouri, Nebraska, Nevada, New Jersey, New Mexico, New York, Oregon, and Pennsylvania. These decisions came out between 1893 and 1979.

The U.S. Constitution contains three provisions which seem to say that voters should be able to vote for anyone, even someone who doesn't meet the qualifications. The First Amendment free speech provision, if applied to voting, does not have any exceptions; it says Congress shall make "no law" restricting expression.

The Equal Protection Clause of the Fourteenth Amendment has been used by the U.S. Supreme Court many times to protect voting rights. For example, it was the basis for the decision striking down poll taxes, because due to variations in wealth, poll taxes are unequal in their effect. All voters must be treated equally, so all ballots should be counted.

The Twentieth Amendment, passed in 1933 to move the inauguration date for president from March to January, has instructions on what to do in case someone is elected president who doesn't meet the qualifications. Although this does not require states to print ineligible candidates on the ballot, it suggests that it would be normal for such candidates to be on the ballot. The amendment says the vice-president-elect should be acting president in that situation.

Colorado printed the name of Linda Jenness on its 1972 ballot, even though she was only age 31. She was the nominee of the Socialist Workers Party. Colorado's Secretary of State knew at the time about Jenness' age.

So far, the Colorado Supreme Court is the only court that has ruled Trump off the ballot, but there are many other cases pending, and they are moving so fast, this issue of *B.A.N.* won't attempt to list these cases and describe their status.

## TRUMP WILL APPEAL TO U.S. SUPREME COURT

On December 20, former President Donald Trump said he will appeal *Anderson v Griswold* to the U.S. Supreme Court. Other than the argument about the right of voters to vote for anyone they wish, he has many potential arguments:

- (1) there is a federal law against insurrection, but Trump was never criminally charged with insurrection, much less convicted;
- (2) Section Three is not self-executing, and Congress has never passed a law setting out guidelines on how it is to be applied;
- (3) he did not take the oath mentioned in Section three (the presidential oath is a different oath);
- (4) the January 6 events were not an insurrection; or if they were, he did not personally trespass into the Capitol;
- (5) Section Three does not apply to presidential primaries, which are not elections to public office. They are elections to choose delegates to national party conventions.
- (6) Section Three does not apply to presidential candidates. It mentions other offices but not president, although it has a catch-all application to "officers of the United States."
- (7) the issue is a "political question" which does not belong in court.

## UTAH BALLOT ACCESS WIN

On December 7, at a federal court hearing, Utah officials said the state will not enforce the January 8 petition deadline for independent presidential candidates. The hearing was in a lawsuit filed by Robert F. Kennedy, Jr., *Maxfield v Henderson*, 4:23cv-112. In 2022, Utah had moved that deadline from August to January, even though the U.S. Supreme Court had ruled in 1983 in *Anderson v Celebrezze* that early petition deadlines for independent presidential candidates are unconstitutional.

## SOUTH AFRICA BALLOT ACCESS WIN

On December 4, the highest court in South Africa, the Constitutional Court, struck down the petition requirements for independent candidates for Parliament, a petition of 15% of the voters. The ruling said that until the law is amended, the requirement will be 1,000 signatures.

## JUSTICE SANDRA DAY O'CONNOR DIES

On December 1, former U.S. Supreme Court Justice Sandra Day O'Connor died. She had been one of the last justices to write anything favorable about minor parties. In 2005, in *Clingman v Beaver*, she wrote, "Although the State has a role to play in regulating elections, it is not a wholly independent or neutral arbiter. Rather, the State is itself controlled by the political party or parties in power, which presumably have an incentive to shape the rules of the electoral game to their own benefit...As such restrictions become more severe, and particularly where they have discriminatory effects, there is increasing cause for concern that those in power may be using electoral rules to erect barriers to electoral competition. In such cases, applying heightened scrutiny helps to ensure that such limitations are truly justified and that the State's asserted interests are not merely a pretext for exclusionary or anticompetitive restrictions."

*Clingman v Beaver* was not a ballot access case. Instead, it was a case on whether the Libertarian Party had a constitutional right to tell the state that it wanted all primary voters to be able to vote in its primary. The state granted that the party had a right to invite independents into its primary, but it didn't permit members of other parties to choose a Libertarian primary ballot. *Clingman* is the most recent decision from the Supreme Court that talks about minor parties.

## INDIANA BALLOT ACCESS WIN

On December 7, an Indiana state trial court struck down a ballot access restriction passed in 2021. It says no one can get on a primary ballot unless the last two times the individual voted in a primary, he or she voted in the primary of the party whose nomination is being sought. *Rust v Morales*, Marion Superior Court, 49D12-2309-PL-36487.

Even though Indiana has had government-printed ballots longer than any other state except Massachusetts, this was only the second time an Indiana ballot access law had been struck down by a state court.

The state is appealing to the State Supreme Court. On December 15, the Supreme Court expedited the case. It will be argued on February 12 at 9 a.m. All the briefs will be in by January 19. The Supreme Court so far has refused to stay the lower court decision. The plaintiff hopes to seek the Republican nomination for U.S. Senate in the May 7, 2024 primary. The law allows the party to waive the law, but the party refused to do that for him.

Rust's last two primary votes were in 2016 (when he chose the Republican ballot) and 2012 (when he chose the Democratic ballot).

The lower court decision depends in part on a U.S. Supreme Court decision in 1973, *Kusper v Pontikes*, 414 U.S. 51, which struck down an Illinois law that wouldn't let voters vote in a primary if the voter had voted in a different party's primary two years earlier.

The lower court also said the law violates the 17<sup>th</sup> amendment, which was passed in 1913 and lets voters choose U.S. Senators.

And it said the law violates the Equal Protection Clause of the 14<sup>th</sup> Amendment, because the law allows the county party to waive the requirement, and in the 2024 election waivers have been granted to other candidates.

## LEGISLATIVE NEWS

**California:** on December 20, State Senator Dave Min (D-Irvine) said he will soon introduce a bill to provide that the Secretary of State may remove ineligible presidential candidates from the ballot. He hopes it passes with an urgency clause, so that Donald Trump's name might possibly be removed from the November 2024 ballot.

The California Constitution, Art. IV, sec. 2(c), says "A person is ineligible to be a member of the Legislature unless the person is an elector and has been a resident of the legislative district for one year immediately preceding the election." This part of the Constitution is not enforced.

In 2012, when a candidate filed a lawsuit to force the state to enforce it against one of her opponents, the State Court of Appeals said that ineligible legislative candidates should still appear on the ballot, and if someone is elected who does not meet that qualification, the remedy is for the legislature to refuse to seat the individual. After redistricting, there are always incumbents who don't live in their new district. They usually move, but not in time to meet the one-year rule. It would be the height of hypocrisy for the legislature to pass a bill removing ineligible presidential candidates, but leaving ineligible legislative candidates on the ballot.

**New York:** on December 22, Governor Kathy Hochul signed A4282B/S3505B. These identical bills move the date of most local partisan elections from November of odd years, to November of even years. As a result, the general election ballot in even years, which is already confusing due to bad ballot format, will be even longer and more confusing.

The bill does not pertain to New York City, which will continue electing its Mayor and other city officers in November of odd years. The state will also continue to elect Supreme Court Justices in November of odd years.

## MORE LAWSUIT NEWS

**California:** On December 12, the U.S. Supreme Court refused to hear *Boydston v Weber*, 23-439. This was a case challenging aspects of the California presidential primary. It was filed by voters who believe that because California holds presidential primaries for its six qualified parties, the Constitution requires that California hold a presidential primary just for independent voters. That ballot would contain the name of all the presidential candidates listed in the six partisan presidential primaries.

**Florida:** on December 5, a Democratic voter filed a federal lawsuit against the state Democratic Party, over its decision to list only President Joe Biden on the Democratic presidential primary ballot. *Steinberg v Democratic Party of Florida*, n.d., 4:23cv-518. The party rules say the party will list all "recognized" candidates, and the lawsuit argues that Congressman Dean Phillips, who is seeking the Democratic nomination, is clearly "recognized". The case will be heard on January 10. Phillips is not a plaintiff.

**Georgia:** on December 20, U.S. District Court Judge Steve C. Jones, an Obama appointee, will hear *Pendergrass v Raffensperger* again. This is the case that concerns whether Georgia's U.S. House districts comply with the Voting Rights Act. The original plan was already struck down, and now the judge will decide whether the plan enacted in December 2023 is also illegal. The longer it takes to settle the boundaries, the more likely it is that the state will need to reduce the number of signatures.

**Maine:** on December 21, a state trial court ruled that Chris Christie should not be on the Republican presidential primary ballot. He needed 2,000 signatures of registered Republicans, and he submitted 6,000. However, he didn't separate all the signatures by town, and so many of them were never checked by the town clerks. *Christie v Fellows*, Kennebec Superior Court.

**Minnesota:** on December 1, the Eighth Circuit again upheld the wording on independent candidate petitions. The petition says that the signer does not intend to vote in the upcoming primary for the particular office relevant to the petition. *Independence-Alliance Party of Minnesota v Simon*, 23-1074. The same court had already reached a similar conclusion in a Libertarian Party case. The wording can't be enforced because voting is secret, but the wording makes it difficult to collect signatures. The decision is by Judge Raymond W. Gruender, a Bush Jr. appointee; and is signed by Judges David Stras and Jonathan A. Kobes, Trump appointees.

**Oregon:** on December 13, U.S. District Court Judge Ann Aiken, a Clinton appointee, refused to enjoin the new provision of the state Constitution that prohibits legislators from running for re-election if they have more than ten unexcused absences from a legislative session. *Linthicum v Wagner*, 6:23cv-1624.

**Tennessee:** on November 29, the League of Women Voters filed a lawsuit against the new law that requires signs at polling places for primaries, warning voters that they can't vote in a partisan primary if they are not "bona fide" members of that party. Tennessee does not have registration by party. The lawsuit claims the law is impossibly vague. *Ashe v Hargett*, m.d., 3:23cv-1256.

**national:** on December 15, a U.S. District Court in Delaware issued a Temporary Restraining Order against the website NoLabels.com, which is not associated with No Labels. *No Labels v NoLabels.com*, 1:23cv-1384.

## CHART ON PAGE FOUR

The page 4 chart shows which candidates are on presidential primary ballots, for the Democratic, Republican, and Libertarian Parties. There was no room to list three Democrats who are only on in Nevada: Brent Foutz, John Haywood, and Stephen Leon.

**PRESIDENTIAL PRIMARY CANDIDATES ON BALLOT**

<b>DEMOCRAT</b>	AL	AR	CA	GA	ME	MI	MN	NV	NH	NC	OH	OK	SC	TX	UT	VT
Joe R. Biden	X	X	X	X	X	X	X	X		X	X	X	X	X	X	X
R Boddie			X						X							
Teresa Bukovinac									X							
Eban Cambridge			X				X		X							
Gabriel Comejo			X				X	X	X					X	X	
Super Crystairoc								X								
Mark S. Greenstein									X							X
Tom Koos									X							
Paul LaCava									X							
Star Locke									X					X		
Frank Lozada	X	X					X	X	X					X	X	
Stephen Lyons	X	X	X					X	X			X				
Raymond Moroz									X							
Derek Nadeau									X							
Jason Palmer							X	X	X						X	X
Arman Perez-Serrato	X	X	X				X	X	X			X		X		
Dean Phillips	X	X	X	X	X	X	X		X		X	X	X	X	X	X
Mark Prascak			X					X								
Donald Picard								X	X							
Paperboy Prince									X							
Richard Rist									X							
Vermin Supreme									X							
Cenk Uygur							X					X		X		X
John Vail									X							
Mariane Williamson	X	X	X	X		X	X	X	X		X	X	X	X	X	X
<b>REPUBLICAN</b>																
Scott Ayers									X							
Ryan Binkley	X	X	X	X	X	X			X	X	X	X	X	X	X	X
Doug Burgum	X	X	X	X	X				X				X			
Bob Carney									X							
John Anthony Castro								X	X				X			
Chris Christie	X	X	X	X		X	X		X	X	X	X	X	X	X	X
Ron DeSantis	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X
Heath Fulkerson								X								
Nikki Haley	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Asa Hutchinson	X	X	X	X		X			X	X		X		X		
Peter Jedick									X							
Perry Johnson				X					X							
Donald Kjornes								X	X							
Mary Maxwell									X							
Glenn McPeters									X							
Scott Merrell									X							
Darlus Mitchell									X							
Mike Pence								X	X							
Vivek Ramaswamy	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X
Tim Scott				X					X	X				X		
Hirsh Singh									X	X						
Sam Sloan									X							
David Stuckenberg	X	X	X	X					X			X	X	X		
Rachel Swift	-		X						X							
Donald Trump	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X
<b>LBRTARIAN</b>																
Charles Ballay	--	--	X	--	--	--	--	--	--	X	--		--	--	--	--
David Dunlap	--	--		--	--	--	--	--	--	X	--		--	--	--	--
Jacob Hornberger	--	--		--	--	--	--	--	--	X	--	X	--	--	--	--
Lars Mapstead	--	--		--	--	--	--	--	--	X	--		--	--	--	--
Chase Oliver	--	--		--	--	--	--	--	--	X	--	X	--	--	--	--
Michael Rectenwald	--	--		--	--	--	--	--	--	X	--		--	--	--	--
Joshua Smith	--	--		--	--	--	--	--	--	X	--		--	--	--	--
Mike ter Maat	--	--		--	--	--	--	--	--	X	--		--	--	--	--

### 2024 PRESIDENTIAL PETITIONING

STATE	REQUIREMENTS		SIGNATURES OR REGIS. OBTAINED					Deadline
	FULL PARTY	CAND	LIB'T	GREEN	CONSTI	RFK JR	NO LABELS	
Ala.	*42,458	5,000	0	0	0	0	finished	Aug. 15
Alaska	(reg) 5,000	3,614	already on	*200	already on	*50	already on	Aug. 7
Ariz.	34,116	(es) #43,000	already on	*already on	0	*2,000	already on	Aug. 17
Ark.	10,000	5,000	already on	already on	0	0	already on	Aug. 1
Calif.	(reg) (es) 75,000	219,403	already on	already on	*234	0	*28,000	Aug. 9
Colo.	10,000	12,000	already on	already on	already on	0	already on	Aug. 7
Conn.	no procedure	#7,500	already on	*0	*0	*0	*0	Aug. 7
Del.	(est.) (reg) 760	(est.) 7,600	already on	*720	*243	0	*35	Aug. 20
D.C.	no procedure	(est.) #5,200	can't start	already on	can't start	can't start	can't start	Aug. 7
Florida	0	145,040	already on	already on	already on	0	already on	Sept. 1
Georgia	69,884	#7,500	already on	can't start	can't start	can't start	can't start	July 9
Hawaii	861	*5,798	already on	*520	0	0	0	Aug. 7
Idaho	17,359	1,000	already on	0	already on	0	*10,000	Aug. 30
Illinois	no procedure	#25,000	can't start	can't start	can't start	can't start	can't start	June 24
Indiana	no procedure	#36,944	already on	0	0	0	0	July 1
Iowa	no procedure	#3,500	already on	0	0	0	0	Aug. 16
Kansas	20,180	5,000	already on	0	0	0	finished	Aug. 5
Ky.	no procedure	#5,000	0	0	0	0	0	Sept. 6
La.	(reg) 1,000	#pay fee	already on	already on	*161	0	0	Aug. 23
Maine	(reg) 5,000	#4,000	(rg) *finished	already on	0	0	already on	Aug. 1
Md.	10,000	10,000	already on	*1,700	0	*1,200	0	Aug. 5
Mass.	(est) (reg) 49,000	#10,000	already on	(reg) 3,991	(reg) 330	0	0	July 30
Mich.	44,478	30,000	already on	already on	already on	0	0	July 18
Minn.	(est) 130,000	#2,000	0	0	0	0	0	Aug. 20
Miss.	be organized	1,000	already on	already on	already on	0	already on	Sept. 6
Mo.	10,000	10,000	already on	*5,400	*1,600	*800	*1,000	July 29
Mont.	5,000	#5,000	already on	already on	0	0	*500	Aug. 14
Nebr.	6,605	2,500	already on	0	0	*500	*2,000	Aug. 1
Nev.	10,096	10,096	already on	*4,100	already on	0	already on	July 5
N. Hamp.	18,575	#3,000	*0	*0	*0	*0	*0	Aug. 7
N.J.	no procedure	#800	0	0	0	0	0	July 29
N. M.	3,562	3,562	already on	already on	0	0	0	June 27
N.Y.	no procedure	#45,000	can't start	can't start	can't start	0	can't start	May 28
No. Car.	13,757	82,542	already on	already on	*18,000	*400	already on	May 18
No. Dak.	7,000	4,000	*6,300	0	0	0	0	Sept. 2
Ohio	40,345	5,000	*2,250	*250	0	0	finished	Aug. 7
Okla.	35,592	pay fee	already on	0	0	0	0	July 15
Oregon	28,576	23,737	already on	already on	already on	0	already on	Aug. 27
Penn.	no procedure	5,000	can't start	can't start	can't start	can't start	can't start	Aug. 1
R.I.	17,884	#1,000	0	0	0	0	0	Sept. 6
So. Car.	10,000	10,000	already on	already on	already on	*600	finished	July 15
So. Dak.	3,502	3,502	already on	*4,100	0	0	already on	Aug. 6
Tenn.	56,083	275	*in court	0	0	0	*6,000	Aug. 20
Texas	80,778	113,151	already on	already on	can't start	can't start	can't start	May 19
Utah	2,000	#1,000	already on	*already on	already on	*already on	already on	Jan. 6
Vermont	be organized	#1,000	already on	0	0	0	0	Aug. 1
Virginia	no procedure	#5,000	*0	*0	*0	*0	*0	Aug. 23
Wash.	no procedure	#1,000	can't start	can't start	can't start	can't start	can't start	July 27
West Va.	no procedure	#7,948	already on	already on	0	0	0	Aug. 1
Wisc.	10,000	#2,000	already on	already on	already on	*0	*0	Aug. 6
Wyo.	3,879	3,879	already on	0	already on	0	*1,000	Aug. 27
TOTAL STATES ON			*35	*19	12	*1	12	

#partisan label permitted. "RFK Jr" = Robert F. Kennedy, Jr. "Deadline" column shows the deadline for the latest way to get on.

\* means entry changed since Dec. 1, 2023 issue. Forward Party is not on chart because it isn't running anyone for president.

**MINOR PARTIES AND INDEPENDENTS  
IN STATE ELECTIONS, NOVEMBER 2023**

Below are vote totals for independents and minor parties, in the legislative elections of November 7, 2023:

**2023 STATE SENATE ELECTIONS**

PARTY	Miss.	New Jersey	Virginia
Libertarian	8,945	2,337	1,108
Soc. Workers	-	821	-
independent	15,396	3,668	5,587
Green	1,077	-	-

**2023 STATE HOUSE ELECTIONS**

PARTY	Miss.	New Jersey	Virginia
Green	1,075	979	-
Libertarian	9,280	1,860	4,997
Soc. Workers	-	1,121	-
independent	8,036	10,053	28,664

In Mississippi, an independent candidate was elected to the State House. Shanda Yates, 64<sup>th</sup> district, won as an independent with 62.1%.

**MINOR PARTY WINS IN NOVEMBER  
2023 PARTISAN ELECTIONS**

The last *B.A.N.* listed partisan elections won by the Forward and Working Families Parties in November 2023 and said this issue would carry the Green and Libertarian list:

Libertarian Party: Indiana: Patricia Warner, Claypool Town Clerk; Susan Klinefelter, Etna Green Town Council. New York: Keith Redhead, Ava Supervisor; Kathleen Redhead, Ava Tax Collector. Pennsylvania: Walter Nesic and David Bails, Houston Council; Daniel Sherman, Slippery Rock Twp., Butler Co., Auditor; Benjamin Breedlove, Jackson Twp., Cambria Co., Constable; Joshua Sloan, Bally Boro, Constable; William Schroeder, Cranberry Twp., Venango Co., Auditor; Eric Pikiewicz, North East Twp., Erie Co., Auditor; Kathryn Divittorio, Corry Area School District; Tom Williams, Hazle Twp., Luzerne Co., Auditor; Alexis Matthews, Liberty Twp., Centre Co., Auditor; Charles Martin, Spring Twp., Centre Co., Auditor; Charles Johnson, Walker Twp., Centre Co., Auditor; Timothy Fink, Clinton Twp., Lycoming Co., Auditor; Tina Kline, Montoursville Boro Council; Joseph Winter, Washington Twp., Northampton Co., Auditor; Neil Belliveau and Nick Liberty, Conewego Twp., Adams Co., Auditors; Caleb Shreve, Straban Twp., Adams Co., Auditor; Christopher Burneisen, Oil City Constable; Elijah Sretching, Northumberland Boro Council.

Green Party: Connecticut: Leif Smith, Constable, Redding; Leif Smith, Zoning Bd alternate, Redding; Dianisi Torres, Windham, Board of Education short term; Kristen Epp and Daniel Phipps, Bd. of Assessment Appeals, Windham; Douglas Lary & Michael Westerfield, Willimantic Tax District; Dagmar Noll, Windham Zoning Bd. Alternate. Pennsylvania: Michael Bagdes-Canning, Cherry Valley Boro Mayor; Tara Yaney, Edgewood, Boro Council.

**ADDENDUM TO VOTER REGISTRATION  
CHART ON DEC 2023 *B.A.N.***

The last *B.A.N.* carried a chart of the number of registered voters in each party in each state, but there was no room in that issue to breakdown the "other" column, so here it is: Alaska: Alaskan Independence 18,984, Moderate 381, Owl 85, Alliance 59, Progressive 244, Patriots 232. California: Amer. Indp. 825,981, Peace & Freedom 131,305, Common Sense 25,017, Amer. Solidarity 455. Colorado: Center 1,268, Unity 3,285, Approval Voting 4,873. Connecticut: Independent Party 29,535. Delaware: Independent Party 10,562, Amer. Delta 492, American 530, Conservative 772, Liberal 686, Natural Law 79, Reform 45, Socialist Workers 135, Nonpartisan 1,173, Mandalorian 84. Florida: Independent Party 218,991, Socialism & Liberation 1,626, Ecology 2,774, People's 951, Reform 1,294, Coalition with Purpose 1,986, Boricua 2,781, Forward 359. Kentucky: Socialist Workers 527, Reform 195. Louisiana: Independent Party 132,419, Reform 844, Conservative 801, Socialist 86, Amer. Solidarity 12, Forward 31. Maine: Forward 31. Maryland: Working Class 4,155. Nebraska: Legal Marijuana Now 5,643. New Jersey: Conservative 14,754, Natural Law 5,652, Reform 1,577, Socialist 7,737. New Mexico: Indp. Amer. 4,523. New York: Independence 332,879, SAM 461, Conservative 154,034. Oregon: Independent Party 141,720, Progressive 3,637. Utah: United Utah 2,300, Indp. Amer. 66,035.

**AURORA PARTY NOMINATES CORNEL  
WEST**

On December 14, the Aurora Party of Alaska, which is qualified for the presidential election but no other office, nominated Cornel West for president. The Green Party had paid to get the Aurora Party on the ballot, but will now do its own presidential petition, which is just starting.

**RUSSIA DISQUALIFIES INDEPENDENT  
CANDIDATE**

On December 23, the Central Electoral Commission of Russia ruled that Yekaterina Duntsova, the leading candidate running against incumbent Vladimir Putin, is disqualified because of various paperwork errors. It is still possible someone else may get on the ballot to oppose Putin.