

January 9, 2024

VIA HAND DELIVERY
Tamara Rueda, Clerk
Kennebec County Superior Court
Capital Judicial Center
1 Court Street, Suite 101
Augusta, ME 04330

Re: Trump V. Bellows
Docket No. AP-24-01

Dear Ms Rueda,

I have attached my signed amicus brief for consideration by the Kennebec County Superior Court.

Respectfully,



Mary Anne Royal
141 Lebanon Road
Winterport ME 04496
kayakmomma3@gmail.com

AUGUSTA COURTS
JAN 9 '24 PM 12:17

STATE OF MAINE)
KENNEBEC, ss)
)
DONALD J. TRUMP,)
Petitioner,)
)
v)
)
SHENNA BELLOWS, in her official)
capacity as Secretary of State,)
STATE OF MAINE,)
Respondent.)
)
KIMBERLEY ROSEN, THOMAS)
SAVIELLO, and ETHAN)
STRIMLING,)
Parties-in-Interest.)

AMICUS BRIEF
Royal Challenger
In Support of Respondent

AUGUSTA COURT
JAN 9 '24 PM 12:11

Introduction

The record of the hearing held on December 15, 2023 includes my closing argument where I declare that Donald J Trump did provide aid and support to the enemies of the Constitution of the United States. I would like to ask the Court to consider the argument I make herein to further support that and the decision made by Secretary of State Shenna Bellows.

Addendums to My Closing Argument

For the purposes of my argument I abbreviate Amendment 14 Section 3 to read: No person shall hold any office who, having previously taken an oath to support the Constitution of the United States, ...or shall have given aid or comfort to the enemies thereof.

1. I contend that the definition of "thereof" as used in Section 3, "of that or it" (Merriam-Webster), "of or about the thing just mentioned" (Cambridge

Dictionary), "of the thing that has been mentioned" (Britannica) refers to the Constitution itself, not the country of the United States. As written in Section 3, "of the United States" is a prepositional phrase that modifies the word "Constitution";

2. I argue further that only citizens of the United States would qualify as enemies of the Constitution because a person of foreign nationality would hold allegiance to their own constitution, if lucky enough to have one. Not until the adoption of the 14th Amendment did the Constitution clearly state who was a citizen although the Framers did use the term citizen liberally, e.g., "No Person except a natural born Citizen, or a Citizen of the United States, at the time of the Adoption of this Constitution, shall be eligible to the Office of President." Section 1, Article 2, United States Constitution. For my purposes natural born suffices as a definition of citizen. Those of foreign nationality may be enemies of the country of the United States, they may break the laws of the United States but they cannot be viewed as enemies of the Constitution of the United States for they cannot rebel per se against the Constitution. They are not citizens of the United States. I would further argue that the post-Civil War legislators who drafted Section 3 understood that citizens of those states that passed Ordinances of Secession or similar resolutions were still citizens of the United States from the perspective of the United States Constitution itself. They were not citizens of a foreign country. Those citizens who interrupted the Constitutionally mandated certification of votes on January 6, 2021 were enemies of the Constitution;

3. In addition I would point to the use of the word "or" as a coordinating conjunction used to connect words or phrases. The drafters did not use and. They used or. Either

condition being met would be reason to deny an individual the possibility of ever holding office;

4. By violating his Constitutionally mandated oath to preserve, protect and defend the Constitution as evidenced by his actions, or lack thereof, on January 6, 2021 Donald J Trump was himself an enemy of the Constitution. John Bingham in 1866 speaking on the floor of the House addressed such broken oaths and future possibilities,

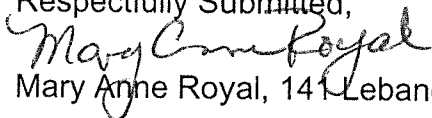
https://archive.org/stream/onecountryonecon00bing/onecountryonecon00bing_djvu.txt ;

5. This violation of his oath of office to preserve, protect and defend the Constitution of the United States and having given aid and comfort to other enemies of the Constitution on January 6, 2021 are necessary and sufficient conditions to declare that Donald J Trump is disqualified from holding office. To do otherwise would be to turn one's back on the Constitution itself. To render the Presidential Oath of Office meaningless. To violate one's own oath to support the Constitution.

Conclusion

I hold that because the enemies of the Constitution of the United States can only be citizens of the United States and because Donald J Trump as President of the United States provided aid and comfort to those enemies on January 6, 2021, in violation of his oath of office, Secretary of State Shenna Bellows' decision finding the primary petition of Donald J Trump to be invalid is the correct remedy. And in fact is the only remedy for such a willful violation of the Presidential Oath of Office and for having given aid and comfort to the enemies of the Constitution.

Respectfully Submitted,



Mary Anne Royal, 141 Lebanon Road, Winterport, Maine 04496

Dated January 9, 2024

Certificate of Service

1- I certify that on January 9 2024 the foregoing was served at Superior Court via hand delivery to 1 Court Street, Suite 101, Augusta, Maine and a courtesy copy sent via email to all parties and their counsel of record:

Office of the Secretary
Attn: Shenna Bellows, Secretary of State
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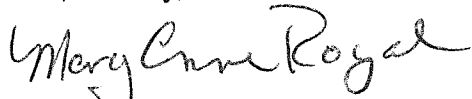
Donald J Trump
% The Law Offices of Bruce W. Hepler, LLC
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SUPERIOR COURT
CIVIL ACTION
DOCKET NO. AP-24-01

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Respectfully,

A handwritten signature in cursive script that reads "Mary Anne Royal".

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Winterport, ME 04496
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Certificate of Service

I certify that on January 9 2024 the foregoing was served at Kennebec County Superior Court via hand delivery to 1 Court Street, Suite 101, Augusta, Maine and a courtesy copy sent via email to Intervenor or their counsel of record:

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Respectfully,



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Certificate of Service

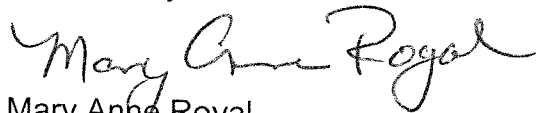
I certify that on January 9 2024 the foregoing was served at Kennebec County Superior Court via hand delivery to 1 Court Street, Suite 101, Augusta, Maine and a courtesy copy sent via email to other interested parties included in the Secretary of State's email of her decision.

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Respectfully,



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