

**DISTRICT OF COLUMBIA
BOARD OF ELECTIONS**

In Re:)	
)	Administrative Order
William Kuduk, Candidate)	No. 26-014
)	Appeal of Preliminary Determination
)	

MEMORANDUM OPINION AND ORDER

This matter came before the District of Columbia Board of Elections (“the Board”) at a special meeting on March 30, 2026. It is an appeal from the Board’s Executive Director’s preliminary determination that William Kuduk, candidate for the Democratic State Committee office of At-Large Committeewoman (“Committeewoman”) in the June 16, 2026 Primary Election (“the Primary Election”), could not have their name appear on the ballot as “Lia Lake Kuduk.” Board Chair Gary Thompson and Member Karyn Greenfield presided over the hearing on this matter. The Candidate’s counsel Mr. Bishop-Henchman and Board’s General Counsel were also present.

BACKGROUND

On January 23, 2026, Candidate Kuduk submitted a Declaration of Candidacy form (“the Declaration”) in support of her candidacy for the Committeewoman seat.¹ That form contained a field for a candidate to enter their name and another field for the candidate to enter how their name should be printed on the ballot. With respect to the latter field, the following admonition appears: “[W]hen listing your name, the Board will not permit a candidate to specify a modified form of

¹ The Declaration of Candidacy form must be filed by candidates seeking to have their names printed on the ballot. 3 DCMR § 601.1 *et seq.*

their given name that confuses or misleads voters and is otherwise not legally acceptable. For example, James Smith could be Jim Smith but not Jim ‘The Best’ Smith.”

On the Declaration, Candidate Kuduk entered “William “Lia Lake” Kuduk” as her name and “Lia Lake Kuduk” as the name that should be printed on the ballot.

On March 23, 2026, the Board’s Executive Director issued a preliminary determination finding that Candidate Kuduk was eligible to run for the Committeewoman seat.² Her determination however also notified Candidate Kuduk that her name would appear on the ballot as “William Kuduk,” thereby alerting the Candidate to the fact that the name “Lia Lake Kuduk” would not appear on the ballot.

On March 25, 2026, Candidate Kuduk sent an email to the Board’s Office of General Counsel seeking a Board hearing with respect to the Executive Director’s preliminary determination.³ In that email, Candidate Kuduk stated that she had a “substantive disagreement with the Board's placement of [her] name on the Democratic Party ballot in the June 16, 2026 Primary Election for the Democratic State Committee office of At-Large Committeewoman[.]”

Later on March 25, 2026, the Board’s Office of General Counsel (“OGC”) notified Candidate Kuduk that a prehearing conference before OGC on her appeal of the Executive Director’s preliminary determination would be held on March 26, 2026. The Candidate was informed that the purpose of the hearing was to identify the evidence she intended to submit to the Board and to confirm the issue(s) she intended to raise. Candidate Kuduk and her attorney, Mr.

² 3 DCMR § 601.6 (providing that the Board’s Executive Director or her designee will, three days after the filing of a Declaration of Candidacy, issue a preliminary determination as to a candidate’s eligibility). The preliminary determination of eligibility set forth in the Board’s regulations goes to the candidate’s qualifications for office. *See* D.C. Code §1-1001.05(a)(14) (providing that the Board issue regulations necessary to determine that candidates meet the statutory qualifications for office). It does not concern the adequacy of the candidate’s nominating petition.

³ 3 DCMR § 601.11 (providing that the candidate must appeal a preliminary determination within three days after receipt of notice of an adverse determination).

Bishop-Henchman, appeared at the prehearing conference. Mr. Bishop-Henchman explained that Candidate Kuduk had used the first name “Lia” on social media accounts since 2018 and the last name “Lake” since 2023. He noted that Advisory Neighborhood Committee meeting minutes refer to the Candidate by the name “Lia Lake,” and that in 2020 she had received a theater award based on that name. The Candidate stated that numerous individuals in the community were prepared to provide statements attesting to the fact that the Candidate is known to them as “Lia Lake.” Mr. Bishop-Henchman pointed out that the name “Lia Lake” was not being used by the Candidate to confuse voters, and there was a brief discussion of the fact that there was no other candidate seeking office through the 2026 Primary with a confusingly similar name. The Candidate also stated that she wished to preserve the argument that she be allowed to use a name that differed from the ballot name she entered on her Declaration. Specifically, she asked that the last name “Kuduk” be removed from her ballot name.

During the prehearing conference, the Candidate and her counsel were asked by the assigned OGC attorney to provide any documentary evidence and a list of potential witnesses by midday the following day. That day, Friday, March 27, 2026, OGC was provided with several public records (reports and social media postings) and unsworn witness statements showing that the Candidate used the first name “Lia” followed by either “Kuduk” and/or “Lake”. The Candidate later also provided the names of two witnesses who were prepared to present live testimony at the Board hearing as to her use of the name “Lia” followed by either “Kuduk” and/or “Lake.”

Candidate Kuduk was duly notified that a hearing would be held on March 30, 2026 on her appeal of the Executive Director’s preliminary determination.⁴ At the Board hearing, the General Counsel summarized the procedural history of the case and the assigned OGC attorney

⁴ 3 DCMR § 601.12 (providing that the Board shall hold a hearing on preliminary determination appeals within three days).

described the issues presented by Candidate Kuduk at the prehearing conference and the evidence she had offered. The Board then heard from Candidate Kuduk's attorney and the Candidate. Both reiterated that the request that the Candidate's name appear on the ballot as "Lia Lake Kuduk," and Mr. Bishop-Henchman noted that the evidence showed the Candidate's use of the name "Lia" as far back as 2018.

The General Counsel recommended that the Board waive the regulation at 3 DCMR §1203.2 (requiring that the name of candidates that appears on the ballot be the candidate's actual name or a modified version of the candidate's given name) and allow the name that would appear on the ballot for Candidate Kuduk to be "Lia Lake Kuduk" instead of "William Kuduk".

After hearing the evidence and the General Counsel's recommendation, the Board Chair made a motion to waive the respective regulation and allow Candidate Kuduk's name to appear on the ballot as "Lia Lake Kuduk." The motion was duly seconded and passed unanimously.

ANALYSIS

The pertinent Board regulation provides that:

The name of a candidate for election shall appear on the ballot in the form designated on the Declaration of Candidacy executed and filed by the candidate . . . provided, that the name conforms to ... the given name or names, or the initial letter of a given name, if any, and surname.

... The Board may permit a candidate to specify a modified form of his or her given name or names on the ballot if the Board finds that the change shall not confuse or mislead the voters and is legally acceptable.⁵

⁵ 3 DCMR §§ 1203.1-1203.2. The regulations also provide that the use of titles, degrees, and prefixes on the ballot is prohibited.

In interpreting that regulation, we note that the term “name” should be given its plain and ordinary meaning.⁶ The D.C. Court of Appeals has opined on the meaning of the term “name”:

A person’s “name” consists of one or more Christian or given names and one surname or family name. It is the distinctive characterization in words by which one is known and distinguished from others, and description, or abbreviation, is not the equivalent of a “name.”⁷

In other words, the regulation, when given its plain and ordinary meaning, requires that candidates be identified on the ballot with only their actual name or a modified version of their actual name, and that they not be identified with descriptive words that are not or do not conform to their given name.

The Board has previously explained that the regulation at issue serves the valid election administration interests of the Board, including that the ballot not be improperly used as a billboard for political advertising and the objective of avoiding voter confusion as to the identity of the candidate. *See Rodney Grant*, BOE Case No. 24-003 (March 19, 2024) at p. 5 and cases cited therein. In the *Rodney Grant* case, the Board expressed concern that entertaining exceptions to the regulation requirement that candidates use their real names on the ballot would open the door to litigation. The Board, however, waived its regulations as the matter presented a “rare case in which the equities warrant allowing this candidate to include a nickname that is neither his actual name nor a modified version of that name.” *Id.* at 6. Factors that we relied on in that case were that the candidate had used his nickname since early childhood which tended to show that the use of the name “Red” was not intended to convey a prohibited political message. We also noted that we had

⁶ *Oversight v. U.S. Dept. of Justice*, 292 F.Supp.3d 501, 508 (D.C.D.C. 2018) (decision supported by the plain meaning of the rule and existing precedent in analyzing it was both reasonable and legally sound).

⁷ *Gore v. Newsome*, 614 A.2d 40, 43 (D.C. 1992) (citing BLACK’S LAW DICTIONARY 1023 (6th ed. 1990)). While the definition of the term “name” excludes abbreviations, the Board’s regulation expressly allows the use of an initial that conforms to a given name.

allowed the candidate to use the name “Red” as his nickname on a prior ballot and that knowledge in the community of the candidate as “Red” Grant suggested that that nickname “Red” was not likely to confuse voters and may actually help them identify him.

Here, it is undisputed that the Candidate’s given name is “William Kuduk.” That said, the overwhelming evidence is that she has been known in her professional and private life as “Lia Lake Kuduk,” and that the use of “William” as the Candidate’s first name would likely actually confuse voters.⁸ In addition, the name “Lia Lake Kuduk” is not associated with a political message. Accordingly, voters would not be confused about the identity of the candidate if their name on the ballot appeared as “Lia Lake Kuduk” and there is no improper use of the ballot associated with placing the name “Lia Lake Kuduk” on the ballot.

CONCLUSION

For these reasons, it is hereby

ORDERED that the Executive Director’s preliminary determination that Candidate Kuduk cannot use the name “Lia Lake Kuduk” in lieu of “William Kuduk” on the 2026 Primary Election ballot is **REVERSED**. Subject to any successful petition challenge that might be filed, the name to be printed on the ballot for Candidate Kuduk shall be “Lia Lake Kuduk.”

⁸ Unlike prior cases where a candidate has been known in the community by a name other than their given name for a considerable period of time, Candidate Kuduk has used the name “Lia Lake” for only several years. That said, she has provided evidence that she is widely known in the community by the name “Lia Lake” or “Lia Kuduk”. While we are hesitant to say that there is some magic period of time or extent of community knowledge of a candidate’s use of a name that is not their given name that would justify waiving our regulations, we think the evidence that voters will not be confused by the name “Lia Lake Kuduk” is sufficient here to warrant waiving our regulations. We do not, however, think that the facts justify placing on the ballot a name for Candidate Kuduk that differs from the one she identified as her preferred name on her Declaration, particularly in light of the fact that the last name of that preferred name is in fact the same as her given last name. Completing and filing the Declaration of Candidacy form is a critical part of the ballot access process. Candidates need to take seriously the information that they provide on their Declarations and be held to the representations made thereon.

Dated: March 30, 2026



Gary Thompson
Chair, D.C. Board of Elections