

**DISTRICT OF COLUMBIA  
BOARD OF ELECTIONS AND ETHICS**

In Re:	)	
	)	Administrative Order
Sandi Stevens	)	No. 26-015
Candidate.	)	Re: Appeal of Preliminary Determination
	)	
	)	

**MEMORANDUM OPINION AND ORDER**

This matter came before the District of Columbia Board of Elections (“the Board”) on Monday, March 30, 2026, and involved an appeal from a Board Executive Director’s preliminary determination that a nominating petition filed by Sandi Stevens (“Candidate Stevens”) lacked a sufficient number of signatures. Board Chairman Gary Thompson and Karyn Greenfield presided over the hearing on this matter. The candidate was not present.

**BACKGROUND**

On January 23, 2026, Candidate Stevens submitted her Declaration of Candidacy form for the office of Delegate to the U.S. House of Representatives.<sup>1</sup> At that time, she was provided with petition forms to be used in support of placing her name on the June 16, 2026 Democratic Primary Election ballot. At the top of each petition sheet is a section in which the office covered by the petition and the candidate’s name must be entered. That section is followed by blank lines allowing up to ten registered voters to sign and print their names and addresses. The last section of the sheet consists of an affidavit to be completed by the individual who gathered (*i.e.*, the petition’s circulator). The language in that section is set forth below:

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<sup>1</sup> By that form, Candidate Stevens identified an email address that she agreed should be used for communicating with her with respect to her candidacy.

CIRCULATOR’S AFFIDAVIT (TO BE COMPLETED BY PERSON CIRCULATING THIS PETITION PAGE)

I, \_\_\_\_\_ residing at \_\_\_\_\_,

Printed Name of Circulator

Address of Circulator

swear or affirm : (A) that I am at least 17 year of age and will be 18 years of age on or before the next general election; (b) that I am either a resident of the District of Columbia or a resident of another jurisdiction who registered as a petition circulator with the Board prior to the circulation of this petition; (c) that I personally circulated this petition sheet; (d) that I personally witnessed the signing of each signature hereon; (e) I have not written, altered, corrected, clarified, or obscured information on the petition about the signer of the petition after the signer affixed their signature to the petition; and (f) that I have personally inquired from each signer whether he or she is a registered voter in the District of Columbia, and whether he or she is registered in the same party as the candidate.

WARNING: READ THE ABOVE AFFIDAVIT AND MAKE SURE IT IS TRUE BEFORE YOU SIGN BELOW. IF YOU ARE CONVICTED OF MAKING A FALSE STATEMENT, YOU CAN BE FINED UP TO \$1,000 AND/OR JAILED UP TO 180 DAYS [D.C. OFFICIAL CODE SECTION 22-2406].

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Date	Signature of Circulator	Circulator’s Telephone Number (Optional)
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Along with the petition forms, Candidate Stevens was provided with written instructions on gathering petition signatures and information on training offered by the Board’s Registrar of Voters on how to gather signatures. One of the documents provided to Candidate Stevens when she picked up her petitions is titled “Circulating and Filing Nominating Petitions.” That Circulating and Filing Nominating Petitions document informs candidates that they “are responsible for ensuring that each individual who circulated nominating petitions on [their] behalf complies with all pertinent rules and regulations regarding petition circulation.” The applicable rules follow, and include that the circulator affidavit on each petition sheet must be completed. The document also instructs that candidates should arrive at the Board “ready to file” and that

petition sheets should be “complete, in numerical order, and correctly assembled.” It further states that circulators should “[m]ake sure that the Circulator’s Affidavit on each petition sheet is completed correctly and signed.”<sup>2</sup>

On March 18, 2026, Ms. Stevens submitted her nominating petition in support of her ballot access effort (“Petition”). The minimum number of signatures required for ballot access for the office Candidate Stevens sought was 2,000.<sup>3</sup> As required by the election laws and regulations, the Board’s staff preliminarily reviewed the Petition to determine whether it contained on its face, i.e., without investigating whether the signatures were valid because they were made by, for example, registered voters), the minimum number of required signatures for ballot access. This preliminary determination is based on counting only those signatures that appear on sheets that contain completed circulator affidavit forms.<sup>4</sup> In Ms. Stevens’ case, 12 petition sheets, each containing 10 signatures, were rejected because the circulator affidavits for those sheets had missing information or were entirely blank.

By letter dated March 23, 2026, the Board’s Executive Director, Monica Holman Evans, informed Candidate Stevens of her preliminary determination that the Candidate did not meet the requirements to have her name appear on the ballot in the Democratic 2026 Primary Delegate

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<sup>2</sup> The Board’s website also has a Candidate Ballot Access Information tab where the Circulating and Filing Nominating Petitions document is posted and which includes links to the Board’s regulations on filing petitions. *See* <https://www.dcboe.org/dcboe/media/PDFFiles/circulating-and-filing-nominating-petitions-06152022.pdf> for that document and <https://www.dcboe.org/dcboe/media/PDFFiles/Chapter-16-CANDIDATE-NOMINATION-060822.pdf> for the relevant regulations.

<sup>3</sup> D.C. Official Code §1-1001.08(i)(1)(B).

<sup>4</sup> *See* Board regulations at 3 D.C.M.R. 1605.3-4.

contest. The letter stated that Ms. Stevens failed to file the number of signatures required pursuant to D.C. Municipal Regulations, Title 3, §§ 1605.3(a) and 1605.4.

The following day, Candidate Stevens visited the Board's offices and discussed with the Board's Registrar of Voters the process of appealing an adverse preliminary determination and the possible avenues for her to cure signature defects.

On March 26, 2026, Candidate Stevens filed a written appeal of the Executive Director's adverse determination of her eligibility. In her written appeal, Candidate Stevens noted that her petition was found to be 26 signatures short and she requested that "the Board reconsider the invalidation of these pages in light of the extraordinary circumstances under which they were submitted." The appeal then explained that during the period in question, the Candidate had been required to travel extensively to attend and support her family through the funeral services of her father-in-law, Reverend Jesse Jackson, Sr. She asked the Board to consider granting her equitable relief and accept three petition pages that had been rejected for circulator error reasons.

Just prior to noon on March 26, 2026, the Board's Office of General Counsel ("OGC") sent Ms. Stevens notice of a prehearing conference that had been set for 10:00 am on March 27, 2026. The notice, which was sent to Candidate Stevens' email address of record, advised her that the purpose of the prehearing conference would be to identify the evidence and issues that would be presented at the Board hearing on her appeal. The notice of the prehearing conference stated: "It is recommended that, in advance of the prehearing conference, you review Board orders in similar matters (*see, e.g., Snyder v. Austin*, BOE Case No. 16-017; *Abley v. Cheeks*, BOE Case No. 12-010 available in the "Administrative Orders" section under the "About Us" tab of the Board's website and at this link: [Administrative Orders | District of Columbia Board of Elections](#) )." The cases cited in the notice addressed the circumstances for curing signatures rejected on the basis of

circulator-related defects and made clear that, where the circulator affidavit was missing a date, testimony from the circulator as to when the signatures on the sheet at issue were gathered would cure that date defect. The notice also advised that the Board would hear Candidate Stevens' appeal on March 30, 2026 at 10:00 am.<sup>5</sup> The notice also warned that issues not raised during that proceeding would not be preserved.

Also, before the close of business on March 26, 2026, the Board's Registrar of Voters provided a report on her review of the Petition and sent that report via email to Candidate Stevens. The report identified each of the 12 Petition sheets that had been rejected for the reason of circulator affidavit defects. According to the report, 60 signatures were rejected because the date field on the circulator affidavit was left blank; 30 signatures were rejected because the name and address fields in that affidavit were left blank, and 30 signatures were rejected because the circulator affidavit fields were completely blank.

Candidate Stevens did not appear at the prehearing conference. Shortly thereafter, OGC sent her an email memorializing her failure to appear at the prehearing conference and advising that, based on that failure to appear, she could present evidence and call witnesses and preserve issues for the upcoming Board hearing through a written motion filed by 4:30 p.m. that day. The email reminded her of the Board hearing and provided a link for accessing that proceeding. When the 4:30 deadline passed without any word from Ms. Stevens, OGC sent her a reminder of the Board hearing with meeting access information.

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<sup>5</sup> See 3 D.C.M.R. § 601.12 providing three days for the Board to decide adverse preliminary determination appeals).

On March 30, 2026, the Board convened a hearing on Candidate Stevens' appeal. Candidate Stevens did not appear. The General Counsel placed a summary of the case on the record and noted the lack of record evidence for overturning the adverse Preliminary Determination. The Board Chair expressed concern with affirming the Preliminary Determination as it appeared that more than enough signatures on the Petition could be easily cured. Accordingly, the Chair made a motion to reject the pending appeal unless the Candidate presented the evidence necessary to cure a sufficient number of signatures on her petition prior to 5:00 pm that day. Following the Board hearing, OGC once again emailed Candidate Stevens, informing her of the Board's determination at the hearing and of her further opportunity to cure her Petition. Notwithstanding the Board's attempt to contact Candidate Stevens, she remained nonresponsive.

### **ANALYSIS**

As indicated above, once a petition is submitted to the Board, it is reviewed preliminarily to determine whether it has a sufficient number of voter signatures on its face. For the purposes of that review, voter signatures appearing on pages with incomplete circulator affidavits are not counted. 3 D.C.M.R. §§ 1605.3(a) and 1605.4. The requirements for a complete circulator affidavit are set forth in D.C. Official Code § 1-1001.08(b)(3). That provision mandates that each nominating petition shall contain an affidavit, made under penalty of perjury and signed by the circulator of the petition, which shall note that the circulator personally circulated the petition and personally witnessed each person sign the petition.

“As the Board [has] recognized, the circulator's role in gathering signatures for a nominating petition is critical to ensuring the integrity of the collection process.” *Williams v. District of Columbia Bd. of Elections and Ethics*, 804 A.2d 316, 318-19 (D.C. 2002). Along these lines, the D.C. Court of Appeals in *Williams* instructed that “[a] genuine and complete affidavit,

... undergirds the presumptive validity of voter signatures on a petition. ... The upshot is that the presumption of validity of petition signatures depends heavily on the role of the circulator and on the truthfulness and completeness of the representations made in the circulator's affidavit.”

The Board has excused minor defects in circulator affidavits where the defect is not contrary to an express statutory requirement in instances where the integrity of the signature is bolstered by extrinsic evidence,. See *Gant v. Douglas*, Administrative Order #22-005 (issued April 22, 2022) (excusing marked-up/written over circulator affidavit dates and citing *Moore v. Butler*, Administrative Order #20-024 (issued Sept. 4, 2020) (waiving as formal error pre-signed circulator affidavit); compare *Brousseau v. Fitzgerald*, 675 P.2d 713, 715 (Ariz. 1984).<sup>6</sup> As indicated above, the 26-signature shortfall in the Petition here could be cured with some extrinsic evidence, particularly with respect to the date that the sheets with undated circulator affidavits were circulated. The Candidate, however, has not pursued her appeal and has not presented the minimal (albeit necessary) evidence that would have cured many signatures on her Petition. Accordingly, we have no choice but to uphold the Executive Director's decision finding that Candidate Stevens' Petition numerically insufficient.

### **CONCLUSION**

For the reasons set forth in this opinion, the Board of Elections concludes that the nominating Petition submitted in support of the candidacy of Sandi Stevens for the office of U.S. Delegate contains an insufficient number of signatures on its face.

Accordingly, it is therefore,

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<sup>6</sup> In *Brousseau*, the court distinguished between petition defects that are matters of form and procedure and serious matters involving more than a technicality.

**ORDERED** that Sandi Stevens be denied ballot access in the U.S. Delegate contest in the June 16, 2026 Democratic Primary Election.

Dated: March 30, 2026



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Gary Thompson  
Chairman Board of Elections