

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:22-cv-00477-JLK

PARABLE, an unincorporated nonprofit association, on behalf of itself and its members;
RON HANKS,
LAUREL IMER,
DAVE PETERS,
CHARLES W. “CASPER” STOCKHAM,
JOANN WINDHOLZ,

Plaintiffs,

v.

JENA GRISWOLD, in her official capacity as Colorado Secretary of State,

Defendant.

DECLARATION OF CHARLES HEATHERLY

I, Charles Heatherly, pursuant to 28 U.S.C. § 1746, do declare as follows:

1. I am over 18 years of age.
2. I am currently a legislative aid for a member of the Colorado House of Representatives.
3. I am a voting member of the Colorado Republican Party State Central Committee, and attended the Committee’s annual meeting on September 18, 2021.
4. I was the principal author, and moved for adoption at the September 18, 2021 meeting of the Colorado Republican Party State Central Committee, of a Resolution authorizing “the Colorado Republican Party, its members, or both” to initiate a lawsuit “at the earliest

possible date to challenge the constitutionality of Proposition 108.” A true and correct copy of that resolution, which was adopted by unanimous vote at the State Central Committee meeting on September 18, 2021, is attached as Exhibit 2 to the Complaint in this case.

5. The Resolution, approved by unanimous vote, also specifies that “a majority of the Colorado Republican Party’s State Central Committee supports choosing Republican Party nominees by a primary election at which only registered voters who are members of the Republican Party are eligible to participate.”

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 23rd day of March, 2022

/s/ Charles Heatherly

Charles Heatherly