

Brandie Draves  
Currituck County Board of Elections Director  
2795 Caratoke Highway  
Currituck, NC 27929

Dear Ms. Draves:

I request that the Currituck County Board of Elections issue a subpoena to NC Senate District 3 candidate Valerie Jordan for the following information, which would prove the location of her permanent residence:

- 1) 2020 and 2021 tax returns
- 2) NCDOT paystubs and reimbursements
- 3) Personal bank statements
- 4) Auto insurance policy for the Lexus with the license plate "DOT 5"
- 5) Amazon Prime order history since December 2020

Thank you for your efforts to protect the integrity of the 2022 election and for your dedication to public service.

Sincerely,

A handwritten signature in black ink, appearing to read "Bobby Hanig". The signature is fluid and cursive, with a large initial "B" and a long horizontal stroke at the end.

Rep. Bobby Hanig

PROTESTOR CERTIFICATION

15. By signing this protest application, you affirm the following:

I, Robert Otho Hanig, swear, under penalty of perjury, that the information provided in this protest filing is true and accurate to the best of my knowledge, and that I have read and understand the following:

(initial)

*ROH*  
*ROH*  
*ROH*  
*ROH*

I have reviewed the statutes and administrative rules governing election protests, including all deadlines.

My protest must originate with a filing at the county board of elections.

I must timely serve all Affected Parties.

I must prove by *substantial evidence* either the existence of a defect in the manner by which votes were counted or results tabulated or the occurrence of a violation of election law, irregularity, or misconduct, either of which were sufficient to cast doubt on the apparent results of the election.

*ROH*  
*ROH*

It is a crime to interfere unlawfully with the conduct and certification of an election.

It is a crime to interfere unlawfully with the ability of a qualified individual to vote and to have that vote counted in the election.

*ROH*

The facts I allege in connection with this protest are true and accurate to the best of my knowledge, and I have a good faith basis to protest the conduct and results of the election.

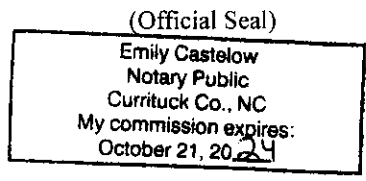
Submitting fraudulently or falsely completed declarations is a Class I felony under Chapter 163 of the General Statutes. This notice is provided pursuant to S.L. 2013-381, s. 5.4.

Signature of Protestor: *Robert Otho Hanig* Date: 8-15-2022  
(This signature must be signed in the presence of a notary)

State of North Carolina, County of Currituck

Sworn to (or affirmed) and subscribed before me this the 15 day of Aug, 2022

*Emily Castelow*  
Official Signature of Notary



*Emily Castelow* Notary Public  
Printed Name

My commission expires: 10-21-2024

Date/Time Filed with County Board: *Daniel* 8/15/22 4:04pm  
(completed by the county board)

NOTE: The county board must provide the State Board with a complete copy of a filed protest within one business day after it is filed. In addition, the county board shall provide a copy of the election audit with this copy of the protest.

Please direct any questions to your county board of elections or the North Carolina State Board of Elections & Ethics Enforcement, PO Box 27255, Raleigh, NC 27611-7255.

**PROTESTOR**

1. Provide your preferred contact information:

Name: Robert Hanig  
Email: obxncpoolguy@gmail.com  
Mailing Address: 102 Orchard Lane, Powells Point, NC 27966

County of Residence: Currituck  
Phone: (252) 207-5479

NOTE: You will be deemed to consent to service at all of the above addresses (including email), unless you attach an addendum indicating otherwise.

2. Are you represented by counsel?  Yes  No

NOTE: If you answered Yes, above, your counsel must complete and you must attach the Counsel Certification Addendum.

3. Mark all that describe you:

- Candidate for the office of North Carolina Senate District 3
- Registered voter eligible to participate in the protested election contest
- Neither of the above\*

*\*If you select this option, you are not eligible to file a protest.*

**PROTEST SCOPE**

4. List all election contests subject to your protest and calculate the margin of votes separating the apparent winner from the runner-up as of the date of filing. Your response does not waive your right to contest the validity of the current vote count. If your protest concerns all contests on the ballot, you must include the vote margin for each contest.

<b>Protested Contest(s)</b>	<b>Current Vote Margin</b> <small>(subtract runner-up totals from apparent winner's totals)</small>
<b>Example: Mayor of Townsville</b>	<b>75</b>
North Carolina Senate District 3	NA

5. This protest alleges (select at least one):

- A defect in the manner by which votes were counted or results tabulated sufficient to cast doubt on the apparent results of the election.
- A violation of election law, irregularity, or misconduct sufficient to cast doubt on the apparent results of the election.

**FACTUAL BASIS & LEGAL ARGUMENT**

6. Provide all factual allegations in support of your protest. If any fact you allege is outside the scope of your personal knowledge, you may attach affidavits from those who have personal knowledge of that fact. All facts you allege in connection with this protest must be true and accurate to the best of your knowledge, and brought in the sincere belief that the facts alleged form a good faith basis to protest the conduct and results of the election.

Valerie Jordan claims to live at 137 Red Oak Ln., Warrenton, NC, which is in NC Senate District 3, but the evidence demonstrates that she never moved to this address or established permanent residency here and therefore is ineligible to run for this office.

- Exhibit A – Jordan purchased a house at 600 Oleander Rd., Raleigh, NC on January 16, 1998.
- Exhibit B – Jordan registered to vote at this address on July 6, 1998.
- Exhibit C – Jordan has paid municipal property taxes on this property since 1998, including last year.

- Exhibit D – Gov. Roy Cooper appointed Jordan to the DOT Board in March 2017; Jordan’s profile on the DOT website still shows her as being from Warren County, but a “long-time resident of Raleigh.”
- Exhibit E – On Statements of Economic Interest beginning in 2017 upon her appointment to the DOT Board, Jordan only listed ownership (100% ownership) in one property – and that being in Raleigh.
- Exhibit F – On Statements of Economic Interest in 2017, 2018, and 2019, Jordan states that she lives with one other adult, Marquita Jordan (her daughter) and one unemancipated minor, “BDJ” (her grandson).
- Exhibit G – On Statements of Economic Interest in 2020 and 2021, Jordan continues to list one property (with 100% ownership) in Raleigh, but states that no adults or unemancipated minors live with her.
- Exhibit H – On her 2022 SEI, Jordan states that another adult does live in her household, Percy Alston, and she lists ownership in multiple properties, including the Raleigh property, plus three properties in Warren County (Note: Jordan never declares rental income on any of her SEI’s; Also note: Exhibit L shows that Jordan owned the properties in Warren County in prior years but did not disclose this ownership in prior SEI’s).
- Exhibit I – Jordan changed her voter registration to 137 Red Oak Ln., Warrenton in December 2020. She did not vote in the 2021 municipal election in Warren County.
- Exhibit J – Jordan’s stepfather, Percy Alston, has owned 137 Red Oak Ln. since August 1989.
- Exhibit K – Jordan still listed her address as 600 Oleander Rd., Raleigh on a political contribution she made on October 31, 2021, nearly a year after she claimed to move to Warrenton.
- Exhibit L – 600 Oleander Rd., Raleigh is listed as the mailing address for the properties Jordan owns in Warren County and in tax documents.
- Exhibit M – While Jordan claims to only live with one other adult on her 2022 SEI, Percy Alston, there are currently six people registered to vote at 137 Red Oak Ln., including Valerie Jordan, Percy Alston, and four others.
- Exhibit N – Zillow states that the house at 137 Red Oak Ln. is 2,160 square feet, matching other records, with one bathroom.
- Exhibit O – Two adults are registered to vote at 600 Oleander Rd.
- Exhibit P – For 23 straight days – from July 20, 2022 until August 11, 2022 – a Lexus with the license plate “DOT 5” and a Ford Explorer with the license plate “DOT 5A” were photographed every morning at 600 Oleander Rd., Raleigh – the Lexus always in the driveway, the Explorer always on the road beside the house. These photographs indicate that the owner of the vehicles, particularly the Lexus in the driveway, stayed at this house for those 23 nights. The vehicles were also photographed there at different times of day, including afternoons, evenings, and nights. Valerie Jordan is the DOT Division 5 Board Member and these are her vehicles.
- Exhibit Q – Letter to the Currituck County Board of Elections requesting a subpoena to Valerie Jordan for the following information: 1) 2020 and 2021 tax returns, 2) NCDOT paystubs and reimbursements, 3) Personal bank statements, 4) Auto insurance policy for the Lexus with the license plate “DOT 5,” and 5) Amazon Prime order history since December 2020.

7. List all individuals, if any, you may call as witnesses to substantiate facts listed in Prompt 6. If there are multiple individuals, summarize the facts of which the individual has personal knowledge.

Nathan Babcock

8. Cite any statute or case, administrative rule or decisions, and election policy or procedure that supports your claim set out under Prompt 5.

The NC Constitution states that qualification for North Carolina Senator “shall have resided in the State as a citizen for two years and in the district for which he is chosen for one year immediately preceding his election.” (N.C. Const. Art. II, § 2)

RELIEF

9. What effect do you believe the facts alleged in response to Prompt 6, if proven, will have on the electoral outcome in the protested contest(s)? Your response should account for the current vote margin calculated in response to Prompt 4.

- The electoral outcome of the protested contest(s) will change. (The facts demonstrate Valerie Jordan is ineligible for NC Senate District 3 as she does not meet the residency requirement.)
- The electoral outcome of the protested contest(s) will not change.
- I am uncertain whether the outcome of the contest(s) will change.
- Other: The facts demonstrate Valerie Jordan is ineligible for NC Senate District 3 as she does not meet the residency requirement.

10. What relief do you seek?

- Correct the vote count
- A new election
- Other: Valerie Jordan should be replaced on the ballot with an eligible Democratic candidate.

ASSISTANCE

11. List all persons who assisted you in preparing the contents of this protest and indicate the nature of the assistance provided:

Nathan Babcock and Dylan Watts obtained the information about Valerie Jordan's property ownership, SEI submissions, voter registration history, political contribution history, and photographs of her vehicle parked at her house in Raleigh.

Note: For protestors represented by an attorney, this protest is the initial filing in a proceeding as defined by N.C. State Bar Rules. See 27 N.C.A.C. 02 Rule 1.00(n).

12. Has any candidate, political party, organization, or person acting on behalf of the same requested that you bring this protest?

- Yes – I am a candidate for NC Senate District 3 and I am filing this on behalf of myself.
- No

13. Have you received any financial or other benefit or promise of future financial or other benefit in exchange for filing this protest?

- Yes
- No

AFFECTED PARTIES & SERVICE

You must serve copies of all filings on every person with a direct stake in the outcome of this protest ("Affected Parties"). Affected Parties include every candidate seeking nomination or election in the protested contest(s) listed under Prompt 4, not only the apparent winner and runner-up. If a protest concerns the eligibility or ineligibility of particular voters, all such voters are Affected Parties and must be served. Address information for registered voters is available from the county board of elections or using the Voter Lookup at [www.ncsbe.gov](http://www.ncsbe.gov).

Materials may be served by personal delivery, transmittal through U.S. Mail or commercial carrier service to the Affected Party's mailing address of record on file with the county board of elections or the State Board, or by any other means affirmatively authorized by the Affected Party. If you know the Affected Party is represented by an attorney, service must be made on his or her counsel. Service must occur within one (1) business day of filing materials with the county board of elections. If service is by transmittal through the U.S. Mail or commercial carrier service, service will be complete when the properly addressed, postage-paid parcel is deposited into the care and custody of the U.S. Mail or commercial carrier service. It is your responsibility to ensure service is made on all Affected Parties.

14. List all Affected Parties, including their service address:

<i>Affected Party</i>	<i>Service Address</i>
Valerie Jordan	600 Oleander Rd., Raleigh, NC 27603