

## **AFFIANT REPORT**

The following are affidavits submitted by residents of Michigan in accordance with the 2020 Presidential Election and the irregularities they experienced before, during and after the election.

Affiants are listed by last name, please see the index (following) linking to each individually.

Michigan Citizens for Election Integrity

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Ryan

Arnoldy

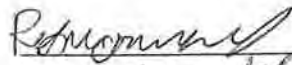
**AFFIDAVIT OF RYAN ARNOLDY**

RYAN ARNOLDY, being sworn, declares under penalty of perjury:

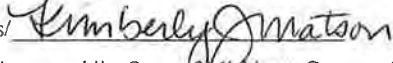
1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. I am a registered voter and credentialed Poll Challenger in the State of Michigan.
3. On November 4, 2020, I arrived at the TCF Center in Detroit Michigan to volunteer as a Poll Challenger for the GOP. I was told that the Absentee Voter Counting Board was heavily populated by Democrat challengers and was in need of GOP challengers.
4. I arrived at approximately 5:00 p.m. As I approached the entrance to the Counting Hall there was a crowd of people outside who appeared to be waiting to enter but were being denied access by Detroit Police officers.
5. I walked up to the main entryway to the Counting Hall and showed my poll challenger credentials to the Police Officer at the entrance. He told me that only media was allowed in.
6. During the time I was there, from about 5:00 pm to 6:00 pm, I saw about 15-20 people exiting the Counting Hall and about 10 people entering the same Counting Hall while I was there waiting outside the door.
7. Of those people entering, some held cameras and appeared to be media, but others who were allowed entry did not have any visible sign that they were media, no credentials or badges around their necks that I could see.
8. My second attempt to gain entry was at about 5:30 pm and again I was told I was not allowed entry into the Counting Hall.

9. I asked the Police Officer at the door why they were allowing the media in and why I was not allowed in as I have Poll Challenger credentials and the counting is continuing to go on. He again said only the media was allowed entry.
10. I asked him who had given him these instructions. The Police Officer replied that they were orders from above and that he, the Police Officer, was just there to enforce the orders from above.
11. At 6:00 pm I left TCF Hall wondering why they allowed the media in but barred Poll Challengers while the counting was continuing.

Dated: November 8, 2020

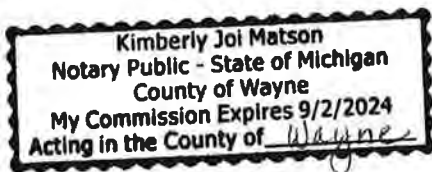
  
Ryan Arnoldy  
[Ryan Arnoldy]  
11/8/2020

Subscribed and sworn to before me on: 11/8/2020

/s/   
Notary public, State of Michigan, County of: Wayne

My commission expires:

9/2/2024



Beverly

Ballew

**AFFIDAVIT OF BEVERLY BALLEW**

Beverly Ballew, being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. I am a registered voter in the State of Michigan and the City of St. Clair Shores.
3. I was a Republican Poll Challenger on November 4, 2020.
4. I began observing on November 4, 2020 at approximately 8:30 am.
5. While observing at Table 50, I witnessed several irregularities where ballot numbers did not match what was in the voter files. I was approximately six feet away from the table except when I needed to get closer to observe.
6. I proceeded to take down my own personal notes when a floor supervisor immediately approached me and in an authoritative manner and told me I was not social distancing. I responded that he was also not social distancing.
7. With little explanation, the floor supervisor proceeded to threaten me with ejection if I did not follow his rules. I backed away and continued to observe.
8. There were several instances in which the poll workers used their bodies to prevent me from watching and observing the ballot counting process.
9. Throughout the day, I witnessed a pattern of intimidation, secrecy, and hostility by the poll workers. Poll workers would cheer, jeer and clap when poll challengers were escorted out of the TCF Center. There seemed to be collaboration between the democratic poll challengers and the City of Detroit poll workers.



Dated: November 8, 2020

*Beverly Ballew*  
Beverly Ballew

Beverly Ballew

Subscribed and sworn to before me on:

/s/ 08 November, 2020

Notary public, State of Michigan, County of:

My commission expires: 06-14-2022

*Florence Dorazio Giunno*  
Florence Dorazio Giunno

Articia

Bomer

**AFFIDAVIT OF ARTICIA BOMER**

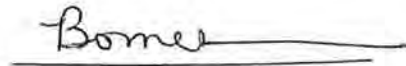
Articia Bommer, being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. I am a registered voter in the State of Michigan.
3. On November 3, 2020 I was a Republican challenger at the TCF Center in Detroit, Michigan. I arrived at approximately 9:30pm and left the next morning at approximately 6:30am.
4. When I arrived I, along with other Republican challengers, were told we needed to remain standing in one place and be six feet away from everyone. Eventually we were told we could move around the counting room.
5. I observed tables 123 and 120. At both table 123 and 120 I noticed USPS boxes of ballots beneath the table. I was able to observe that many of these ballots in the boxes were either straight ticket Republican or had votes for Donald Trump. These ballots seems to be separated from the rest of the ballots being counted.

6. I witnessed a meeting between election worker “team leads” where they gathered together and spoke, this meeting ended in a cheer. Many of these team leads wore mask or other materials supporting “Black Lives Matter” or other political causes.
7. At approximately 11:43pm I heard one of the team leads yell “this is our house tonight!” At approximately midnight, I heard this same man say racist remarks about black people who support Donald Trump. I believe these remarks were directed at me.
8. I witnessed election workers open ballots with Donald Trump votes and respond by rolling their eyes and showing it to other poll workers. I believe some of these ballots may not have been properly counted.
9. I observed a station where election workers were working on scanned ballots that had issues that needed to be manually corrected. I believe some of these workers were changing votes that had been cast for Donald Trump and other Republican candidates.
10. I observed ballots with cursive writing notes at the top right hand corner. I observed approximately 500 ballots with this writing. These ballots did not have ballot codes on them.
11. At approximately 4:03am a poll worker announced that 50 boxes of ballots were coming in. Election workers loudly cheered this announcement.

12. At approximately 4:50am I witnessed a man spraying a chemical on a ballot counting machine. He then placed twenty-seven ballots into the machine and I noticed tape on the top of the ballot where a ballot number would normally be. Throughout the night I witnessed him insert these same 27 ballots at least five times.
13. At approximately 5:15am an announcement came in for counters to clean their tables. Ballots were still throughout the counting room.
14. In between the announcing at 4:03am of 50 new boxes and the announcement at 5:15am for workers to clean their tables, I did not observe the 50 new boxes coming in or counted.
15. There were no "bag checks" for anyone taking or bringing ballots into the TCF Center.
16. On November 4, 2020 I returned to the TCF Center at approximately 10:30am. I was not allowed in.
17. I took notes documenting these issues while I was at the TCF Center.

Dated: November 8, 2020



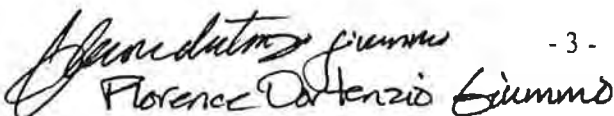
Articia Bomer  
Articia Bomer

Subscribed and sworn to before me on:

/s/ 08 November, 2020

Notary public, State of Michigan, County of: Wayne

My commission expires: 06-14-2022



- 3 -

Scott

Brigmon

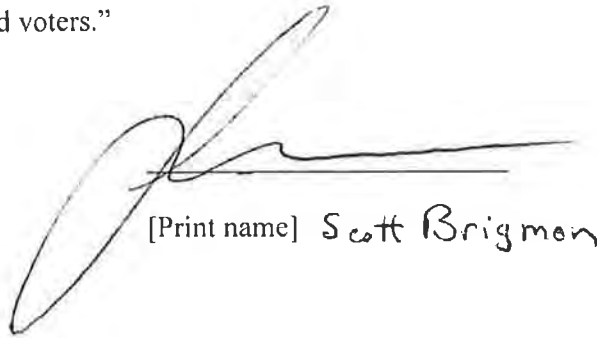
**AFFIDAVIT OF SCOTT BRIGMON**

Scott Brigmon, being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. I am a registered voter in the State of Michigan.
3. On Wednesday November 4, 2020 I arrived at the TFC Center in Detroit, Wayne County, Michigan at approximately 12:30pm. Upon arriving I received credentials as a non-partisan challenger for the counting of ballots. At that time I was told by an attorney for the City of Detroit that no more challengers could be admitted to observe counting tables until other challengers left. It was not clear to me how they determined the number of challengers present and I believe their count included Republican challengers who had already left.
4. At approximately 7:30pm I was informed by an employee of the City of Detroit that I would be admitted in a group of four non-partisan challengers. I then went to a counting table that was also being monitored by a Democrat and a Republican challenger. An envelope containing absentee ballots came to this table that had been mailed to Mount Clemons, Michigan. I challenged this ballot because it was mailed to an address outside of Detroit, but was returned to Detroit.
5. At approximately 8:30pm I went to another counting table. At this second table there was a Republican and Democrat challenger. The election workers at this table began scanning envelopes containing absentee ballots into a computer. The computer would display a profile with the voter's information after the envelope was scanned. While at this table I witnessed an envelope being scanned and the computer displayed "unlisted

voter.” The election workers manually entered information into the profile for this envelope into the computer system. I witnessed the election worker enter in a birthdate of 1/1/1900 for this envelope. The Republican challenger challenged this ballot. I witnessed a similar situation occur thirteen more times and I challenged these thirteen ballots. In all of these situations the ballot was scanned and came up as “unlisted voter,” the election worker then manually entered information into the computer including the 1/1/1900 birthdate. The Republican challenger challenged other additional ballots for the same reason. At this table I also noticed election workers manually input the same name into two separate profiles in the computer system for envelopes that scanned as “unlisted voters.”

Dated: November 7, 2020



[Print name] Scott Brigmon

Subscribed and sworn to before me on:

/s/ Wesley M. Russin

Notary public, State of Michigan, County of:

My commission expires: 9-9-2026





Cynthia

Brunell

**AFFIDAVIT OF CYNTHIA BRUNELL**

CYNTHIA BRUNELL, being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. I am a registered voter in the State of Michigan.
3. I was a Republican Party poll challenger for the November 3<sup>rd</sup> presidential election.
4. Prior to election day, I volunteered and participated in on-line training through the Republican Party.
5. On election day, I was assigned as a Republican poll challenger to a late-night shift (9pm to 5am) at the TCF Center in Detroit.
6. I arrived at the TCF Center a few minutes before 9pm on Tuesday November 3, 2020 with my husband, David Brunell, an attorney volunteer for the Republican Party.
7. I was assigned to table 21.
8. Table 21 consisted of a circle of separate work tables, staffed by five (5) individuals who performed designated functions for the opening and reviewing of absentee ballots.
9. There was also supervisor who oversaw the ballot review for Table 21 and a number of others Tables.
10. When I arrived, I was directed by the election official supervisor to sit in the center of the aisleway, 6 to 8 feet away from the circle of tables where the absentee ballots were being reviewed.

11. The election workers sitting at the circle of tables for Table 21, refused to speak to me, only occasionally stating that I should move away, that I was too close or that they weren't allowed to talk to me.
12. No one would tell me their names. One of them invited me to sit near him at his work station but the other workers quickly admonished him – leaving me sitting in the aisleway.
13. Election worker in position #1, slit open the envelope. Position #2 verified the ballot number against the voter registration data base using a lap top computer. Position #3 would pull out the inner envelope containing the ballot and re-verify the name and ballot number. Position #4 opened the ballot, removed the perforated top of the ballot and reviewed the ballot. Position #5 flattened the reviewed ballots and assembled them in bundles of 50 for actual processing.
14. Over the course of time, I was trying to keep track of ballot issues that were identified, but I couldn't see what was going on so I eventually left my aisle seat and started walking around the election workers performing their jobs in the circle of tables.
15. The ballot issues that were identified by the election workers, included ballot numbers not matching, lack of signatures, unregistered voters and ballots which indicated straight ticket selection for both political parties.
16. When I heard of an irregularity, I would write down the issue in order to keep track. As the night wore on, I started writing down names and ballot numbers.
17. Some of the irregularities that I recorded were as follows:
  - a. Voter Denise Brooks didn't sign the envelope or ballot. Her ballot was processed through the electronic ballot counter.

- b. Voter Dervorna Wilson didn't sign the envelope or ballot. Her ballot was processed through the electronic ballot counter.
  - c. Voter Kevin Douglas Merriweather II ballot numbers didn't match. His ballot was processed through the electronic ballot counter.
  - d. Voter Miles Whitfield numbers on envelope and ballot did not match. White tape was placed on his ballot. His ballot was processed through the electronic ballot counter.
  - e. Voter Stacy Denise Prichart didn't sign envelope or ballot . Her ballot was processed through the electronic ballot counter.
  - f. Voter Steven Alante Ousley Scott born in 1929 was not a registered voter. His ballot was processed through the electronic ballot counter.
18. I was never afforded an opportunity to look at any of the ballots at any point in the process, in order to ascertain for myself, if there were irregularities. I was forced to keep a distance. When the election workers identified a problem with a ballot, I would try to observe it, but was constantly told to keep a distance and if I asked to see something, they told me that were not permitted to talk to me.
19. On eleven (11) occasions, irregularities were identified. Those ballots were not segregated. On a number of occasions, the supervisor directed that some of the flagged ballots be returned to the election worker in position #3 who was instructed to place white tape over some portion of the flagged ballot. I could not identify what specific information was covered by the tape. I assumed that the white tape indicated that the ballot was flagged and would not be processed. The ballots with white tape were not separated or segregated but were bundled with the other ballots for processing and counting.
20. There was a box for rejected ballots on one of the tables, but no ballots were ever placed into the box. The supervisor instructed the worker at position #3 not

to use the rejection box because the process for dealing with flagged or irregular ballots had changed.

- 21. Twice during my shift, the supervisor removed a stack of ballots from Table 21 after they were opened at position #1 but before they were verified at position #2. I don't know what she did with those ballots but I know they were not verified or reviewed by Table 21.
- 22. To my surprise, all of the 268 ballots reviewed by the workers at Table 21 were electronically processed and only 4 were rejected. Based on the irregularities that were identified by the election workers, I had expected that at least eleven ballots would have been rejected.

Dated: November 8, 2020

  
 CYNTHIA BRUNELL  
 29251 Broadmoor  
 Livonia, MI 48154

Subscribed and sworn to before me on: *November 8, 2020.*

Is/ *Philip Needham*

Notary public, State of Michigan, County of: *Macomb*

My commission expires: *June 12, 2026*

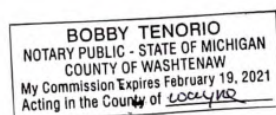
*Acting in County of Wayne*

PHILIP NEEDHAM  
 NOTARY PUBLIC, STATE OF MI  
 COUNTY OF MACOMB  
 MY COMMISSION EXPIRES Jun 12, 2026  
 ACTING IN COUNTY OF *WAYNE*

Melissa

Carone

1. My name is Mellissa A. Carone, I was contracted by Dominion Voting Services to do IT work at the TCF Center for the November 3, 2020 election, and I am a resident of Wayne County.
2. I arrived at the TCF Center at approximately 6:15 AM November 3, 2020 and worked until 4:00 AM November 4, 2020. I went home to get some sleep, then arrived back at the TCF Center at 10:00 AM in which I stayed until 1:45 PM. During this time I witnessed nothing but fraudulent actions take place.
3. The counters (which were trained very little or not at all), were handed a "batch" (stack of 50) of mail-in ballots in which they would run through the tabulator. The tabulators would get jammed 4-5 times an hour, when they jammed the computer would put out an error that tells the worker the ballot number that was jammed and gives an option to either discard the batch or continue scanning at which the counter should discard the batch, put the issue ballot on top of the batch and rescan the entire batch. I witnessed countless workers rescanning the batches without discarding them first which resulted in ballots being counted 4-5 times.
4. At approximately midnight I was called over to assist one of the counters with a paper jam and noticed his PC had a number of over 400 ballots scanned- which means one batch was counted over 8 times. This happened countless times while I was at the TCF Center. I confronted my manager, Nick Ikonomakis saying how big of a problem this was, Nick told me he didn't want to hear that we have a big problem. He told me we are here to do assist with IT work, not to run their election.
5. The adjudication process, from my understanding there's supposed to be a republican and a democrat judging these ballots. I overheard numerous workers talking during shift change in which over 20 machines had two democrats judging the ballots-resulting in an unfair process.
6. Next, I want to describe what went on during shift change, it was a chaotic disaster. It took over two hours for workers to arrive at their "assigned areas", over 30 workers were taken upstairs and told they didn't have a job for them to do. These people were chosen to be counters, in which 6 workers admitted to me that they received absolutely no training at all.
7. The night shift workers were free to come and go as they pleased, they could go out and smoke from the counting room. This is illegal, as there were boxes and stacks of ballots everywhere, anyone could have taken some out or brought some in, and No one was watching them.
8. There was two vans that pulled into the garage of the counting room, one on day shift and one on night shift. These vans were apparently bringing food into the building because they only had enough food for not even 1/3 of the workers. I never saw any food coming out of these vans, coincidentally it was announced on the news that Michigan had discovered over 100,000 more ballots- not even two hours after the last van left.
9. When a worker had a ballot that they either could not read, or it had something spilled on it, they would go to a table that had blank ballots on it and fill it out. They were supposed to be filling them out exactly like the one they had received but this was not the case at all. The workers would also sign the name of the person that the ballot belonged to-which is clearly illegal.
10. Samuel Challandes and one more young man in his mid-20 were responsible for submitting the numbers into the main computer. They had absolutely no overhead, my manager Nick would assist them with any questions but Nick was on the floor assisting with IT most of the time.



11. There was a time I overheard Samuel talking to Nick about losing tons of data, they all got on their phones and stepped to the side of the stage. I asked Nick what was going on and he told me it was all taken care of and not to worry about it. I fully believe that this was something very crucial that they just covered up.
12. I was the only republican working for Dominion Voting, and on the stage there was many terrible comments being made by the city workers and Dominion workers about republicans. I did not give out any indication that I was a republican, I have a family at home and knew I was going to have to walk to my car at the end of my shift. If anyone had an American flag on their shirt or mask, they were automatically deemed to be Trump supporters.
13. I called the FBI and made a report with them, I was told that I will be getting a call back.
14. I am doing my best to make sure something is done about this, I was there and I seen all of this take place.

On this 8<sup>th</sup> day of November, 2020, before me personally appeared Mellissa A. Carone, who in my presence did execute the foregoing affidavit, and who, being duly sworn, deposes and states that he has read the foregoing affidavit by him subscribed and knows the contents thereof, and that the same is true of his own knowledge and belief, except as to those matters he states to be on information and behalf, and as to those matters he believes them to be true.

Mellissa A. Carone *Mellissa A. Carone* 11/08/20

Notary Public, Washtenaw County, Michigan

My Commission Expires: 02 19 2021  
Feb 19, 2021

*Bobby Tenorio* 11/8/2020

BOBBY TENORIO  
NOTARY PUBLIC - STATE OF MICHIGAN  
COUNTY OF WASHTENAW  
My Commission Expires February 19, 2021  
Acting in the County of Washtenaw



William

Carzon

AFFIDAVIT OF WILLIAM CARZON

RECEIVED by MSC 11/26/2020 2:44:13 AM

William Carzon, being first duly sworn, hereby declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. I am an adult citizen, resident of Plymouth Township, and a registered voter of the State of Michigan.
3. I voted in the November 2020 Presidential Election.
4. I volunteered and was certified to be a Republican poll challenger during the absentee ballot counting on election night November 3, 2020 at the TCF center in Detroit, Michigan. I volunteered to participate as a poll challenger from November 3, 2020 starting at 10 pm through November 4, 2020 until 5:00 am.
5. On November 3, I arrived at the TCF center at around 9:30 pm and proceeded to room number 260 where I was given further instructions on the layout for each of the absentee ballot counting board groups, each consisting of 5 inspectors (if fully staffed). At approximately 10 pm I proceeded the floor of the TCF center where the counting would take place. I presented my credentials in the counting board room and spent a significant part of my time at table 18.
6. Counting began shortly after that time and I watched the process at table 18, first paying attention to the label scanning, name and ballot number announcement (operator 1) and verification of the name/number (operator 2) on the ballot. In general, table 18 followed this communication process but it was

not always easy to hear the confirmation. I also took the opportunity to walk to other counting stations throughout the night and I did not see that this discipline of announcing the name and number between operator 1 and 2 always being consistently followed.

7. During the night, on two occasions (at the start of the 10 pm shift and again later in the night), the counting board supervisors working at the TCF center were called over the TCF announcement system to meet near the front of the hall.
8. On two occasions during the night, I followed operator 5 at another counting board group as he took the ballots to a tabulator station in the center of the hall to be counted. I saw the ballots fed through the tabulator machine on at least two occasions multiple times. It is not clear if there was a count mismatch requiring the ballots to be re-run through the tabulator, and I could not clearly see that if there was a count mismatch, that the tabulator was zeroed out before re-running them.
9. On one occasion at a tabulator station, after the person operating the tabulator had run the ballots through the tabulator provided to her by operator number 5, she handed back one ballot to operator number 5 who originally brought the ballots from his counting board station to be counted. He took the ballot and then proceeded to walk back to his counting board table. I am not certain why a ballot would be handed back, and understood that after the ballots were run through the tabulator and the count matched, the ballots that were run through the

tabulator were all to be stored in the security boxes directly behind the tabulator stations for the given precinct.

10. Between approximately 1am to 4am, the counting taking place at the TCF center was at a standstill at many tables. I observed some counting board tables where some operators had their heads resting on their tables during this slow time without ballots to process. I also observed some operators at the tabulators similarly with their heads resting on their tables. I also witnessed one tabulator operator towards the back of the floor playing some sort of card game on his computer/tabulator screen. This was also witnessed by my son and another acquaintance that we both know.
11. At around 4 am, a truck arrived at the back entrance of the TCF center hall. I walked to the back of the hall to the large door opening and witnessed a white truck which had an emblem with a flag and the words *Vote Mobile* written on it. My son, who was also a poll challenger at TCF during this time, also witnessed this as we were standing together for a short time watching the truck being unloaded. White postal boxes were being taken off the truck. The white postal boxes were similar to those holding ballots that were also at the various counting board tables throughout the hall. The boxes that were unloaded from the truck had a cardboard wrap sleeve around them. I saw boxes being unloaded from the truck and placed on a dolly and rolled over to the center of the TCF hall where they were placed on tables next to the main stage area. The tables in this area

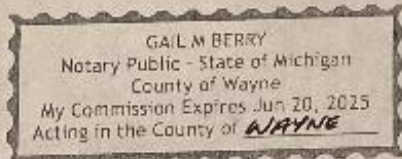
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did not have similar boxes on them when these new boxes arrived. I was able to roughly count the boxes from the truck which were placed on the tables and estimate that approximately 60 boxes were unloaded from the truck from that 4 am delivery. When the cardboard sleeve was removed from the postal boxes, the individual manila envelopes used to hold absentee ballots could be clearly seen. Shortly afterwards, over the TCF speaker/announcement system, specific counting board tables were called up and representatives then came up to get their "additional work" as it was announced over the speaker/ announcement system. I witnessed a person who distributed the ballots, handing them out to some of the respective counting board representatives who were coming up to pick them up.

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- 12. The above information is true to the best of my knowledge, information and belief.
- 13. Further affiant says not.

Dated: NOVEMBER 21, 2020 William Carzon  
William Carzon



Subscribed and sworn before me on:  
NOVEMBER 21, 2020  
[Signature]  
Notary Public, State of Michigan, County of WAYNE  
My Commission Expires: 06/20/2025  
Acting in the County WAYNE

Cynthia


Cassell

**AFFIDAVIT OF CYNTHIA CASSELL**

The Affiant, Cynthia Cassell, being first duly sworn, hereby deposes and states as follows:

1. My name is Cynthia Cassell. I am an adult citizen and resident of the State of Michigan.
2. On November 3, 2020 from around 9am-1pm, I helped surveil the exterior of the Department of Elections in the City of Detroit located on West Grand Blvd.
3. I observed organizations, including a group called "Election Defenders" handing out free food and t-shirts from large "Dominion Voting" boxes. The boxes of freebies were taken out of a Ford Focus and placed around two male employees from the Department of Elections.
4. These two men from the Department of Elections held USPS white open trays. People driving in the street and walking on the sidewalk would drop absentee ballots off in the tray.
5. Election Defenders stationed themselves very close to the employees from the Department of Elections where people dropped off ballots.
6. Campaign workers holding signs and actively campaigning, also stationed themselves close to the Department of Elections workers, certainly within 100 feet.
7. People walked or drove up and would get handed a free t-shirt that said the word "Vote" on it upon dropping off absentee ballots.

- 8. The two men from the Department of Elections with the open trays would go up to cars, lean into open windows in the cars to take the ballots, or people would use the trays as a drop box.
- 9. The trays were open; nothing seemed secure about this procedure.
- 10. I saw numerous people drop off absentee ballots and then be handed meals and t-shirts.
- 11. My account of being denied to work for the City of Detroit as an election worker, my report from my surveillance on November 3, 2020, and my experience at TCF Center on November 4, 2020 is attached to this affidavit.

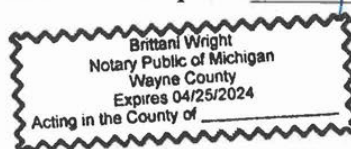
  
 \_\_\_\_\_  
 Cynthia Cassell

On this \_\_\_\_th day of November, 2020, before me personally appeared Cynthia Cassell, who in my presence did execute the foregoing affidavit, and who, being duly sworn, deposes and states that she has read the foregoing affidavit by her subscribed and knows the contents thereof, and that the same is true of her own knowledge and belief, except as to those matters she states to be on information and belief, and as to those matters she believes them to be true.

  
 \_\_\_\_\_  
 Name of Notary Public

  
 \_\_\_\_\_ County, Michigan

My Commission Expires: 04/25/2024





11/3/2020

Cynthia Cassell Surveillance of Detroit Board of Elections, 2978 W. Grand Blvd, Detroit, 48202

I arrived at 9:00 am and witnessed two black males, 20's, wearing a Detroit Election Apron collecting ballots on West Grand Blvd from cars. They were using open USPS boxes without a top. Sometimes the drivers would drop the ballot in the box, at other times the work would lean into the car and take the ballot from the occupants. Around 10:00am an SUV with World Central Kitchen workers pulled up in front of the Board of Elections entrance. The workers were giving free take-away meals to people who had dropped off their ballots. In front of the SUV was a hatchback belonging to Election Defenders, who was also giving away free T-shirts and snacks such as chips and cookies to voters.

Within 20 feet of the Election Workers collecting ballots were campaigners for Sherry Gay-Dagnogo. They were campaigning with signs.

10:30 an election worker bought out Dominion Voting boxes. In those boxes were T-shirts with the word VOTE in large letters, and something written in red in smaller letters. I was unable to read the red writing. The men with the boxes collecting ballots were giving away the t-shirts to the voters in the cars. People were also coming out of the Board of Elections and collecting T-shirts for themselves. Everyone during this time were also going to the World Central Kitchen vehicle and collecting a free meal and bottle of water.

12:30 A large commercial vehicle was circling the block giving away pizza to voters. I was on the phone with the Trump Election Attorneys giving my report so I do not have the exact wording but I believe it was Pizza To the Polls.

1:00 pm I went to TCF Center to be a poll challenger. Attached is my incident report with a democrat supervisor taking me into the Men's Room with a blank ballot.

While in the counting room I was told that I was not allowed to stand near other GOP Poll Challengers and was kept about 20' away from the counting tables. I did not notice any republican vote counters at the table. It was a very hostile environment. I was taken to the blank ballot and military vote table. I witnessed a poll worker taking a stack of military ballots and placing it under the table. The poll worker was challenged and put the ballots back.

2:30 pm I went to lunch with other GOP Poll workers. When we returned to the counting room we were locked out by the police who claimed that the room was over

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capacity. I was able to use my Press Pass to re-enter the room but was not allowed outside the press area.

I received a call to return to my surveillance at the Board of Elections. I did not witness anything of significance, and I left around 5:30 with the 3 other GOP members who were also watching the rear of the building for ballot transfers.

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INCIDENT REPORT			
TIME:	Type of ballot: <input type="checkbox"/> Absentee <input type="checkbox"/> Early Voting <input type="checkbox"/> Election Day <input type="checkbox"/> Provisional		
NAME	CYNTHIA GAIL CASSELL		
FULL ADDRESS	[REDACTED] DETROIT, MI 48224		
PHONE	[REDACTED]		
LOCATION			
STATE	MICHIGAN	COUNTY	WAYNE
MUNICIPALITY	DETROIT	POLLING LOCATION	TCF Center
1:00 pm Nov 4, 2020 DESCRIPTION OF INCIDENT (Use back to continue if necessary)			
<p>An election worker picked up a blank ballot from the ballot table. My assignment was to follow the ballot to the counting table. The man asked why I was following him. I explained that I have to follow the ballot to the table. He tried to be funny and took me through the entire hall into the men's room. <del>At</del> He was going in I told him that a blank ballot</p>			
WHAT REMEDY OR RESPONSE, IF ANY, WAS TAKEN WITH RESPECT TO THE INCIDENT?			
<p>May not go into the men's room. He finally relented when he saw that I was serious and took the ballots to table #67. He was trying to intimidate me and sexually harass me.</p> <hr/> <p>I was asked by party workers to fill out an incident report.</p>			
Category of Incident (check all that apply)			
<input type="checkbox"/> Illegal Voting <input type="checkbox"/> Intimidation <input type="checkbox"/> Electioneering <input type="checkbox"/> Ballots <input type="checkbox"/> Machines <input type="checkbox"/> Election Workers <input type="checkbox"/> Provisional Ballots <input type="checkbox"/> Poll Opening <input type="checkbox"/> Poll Closing <input type="checkbox"/> Violence <input type="checkbox"/> Challenge <input type="checkbox"/> Other			
Is the Issue Resolved? <input type="checkbox"/> YES <input type="checkbox"/> NO		Call taken by:	

Paid For by Donald J. Trump for President, Inc.

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I, Cynthia Cassell, was hired as a Poll Worker for Absentee Ballots in Detroit as a Republican. It was very difficult to get assigned to any training class. I made several calls and finally got to the very last class at Wayne County Community College North West Campus on Saturday, October 24. I started the class and an hour through I realized they had placed me in the incorrect class. I was taken out of the class and sent to a supervisor. I was then told that they hired too many people and I can't be placed anywhere in Detroit. I did have several heated emails with the Clerk's Office, but since they were sent through their internal system, I do not have copies. For months I filled out their forms waiting for training. I was never placed in a Poll Working paid position, yet when I was in Cobo Hall as a Poll Challenger, I only saw tables of Democrats, many of them wearing political t-shirts and masks.

To follow are some of the emails confirming that I was hired.

.  
**Poll Worker Training Resources**

Inbox



**Democracy MVP <DemocracyMVP@govsubscriptions.michigan.gov>** Oct 26, 1:12 PM

to littlsecr

Hi Cynthia –

Thank you again for signing up to serve as an election worker in the upcoming election. By stepping up to serve your state and community, you are making a significant difference and helping our elections run safely and smoothly.

**If you have been hired and placed by a local clerk to work on Election Day, congratulations and thank you!**

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If you have not been hired and placed by a clerk to work on Election Day, please check-in with us and let us know where you're at in the process by filling out our [check-in form](https://www.surveymonkey.com/r/67Q78FR): <https://www.surveymonkey.com/r/67Q78FR>

In addition to mandatory training provided by clerk staff, please take a moment to review the training resources below so you are ready to serve on Election Day.

There are 8 short videos – and you can watch them all on our [Youtube playlist](#).

You can also find supplemental poll worker training resources by visiting [Michigan.gov/DemocracyMVP](https://www.michigan.gov/DemocracyMVP) and visiting our [Election Worker Resources](#) section. There, you will find informational one-pagers in addition to the videos in the [playlist](#) above.

Training videos and materials cover many key subjects, including:

- [What to Expect on Election Day](#)
- [Opening the Polls](#)
- [Processing Voters](#)
- [Closing the Polls](#)
- [Absentee Counting Boards](#)
- [Challengers](#)
- [COVID-19 Safety](#)
- [Five Facts About Voting](#)

These resources don't replace training provided by clerks. But they can help you prepare.

Thank you for being part of the team preserving and protecting democracy this fall.

All the best,  
The DemocracyMVP Team

Re: Poll Worker - #DI00271586

Inbox



**DemocracyMVP Inbox** [via mdosupport.happyfox.com](https://mdosupport.happyfox.com)

Mon, Oct 12,  
7:01 PM

to me

Dear Cynthia Cassell,

Thanks for letting us know and for your patience here - there is definitely still a need in the area we suggested you apply. We are aware that their clerk's office is still currently assessing needs, sorting through election worker applications and actively reaching out to applicants. We appreciate your patience as they continue contacting applicants to set up training - I'd advise sitting tight and waiting to hear from them for at least another week or so.

You can also proactively reach out to their elections department to check on the status of your application - although there may be a wait to speak with someone.

Hope this helps and please let me know if you have further questions.

Sincerely,

**Sarah Reinhardt**  
*Department of State Information Center*  
Michigan Department of State  
Secretary of State Jocelyn Benson  
[Michigan.gov/SOS](http://Michigan.gov/SOS)

-

**Email ID:** #DI00271586

**Subject:** Poll Worker

**Message:** Last Contact Reply

From: Cynthia Cassell

Date: Mon, Oct 12, 2020 at 02:47 PM

I have been contacted by phone once regarding training to be a poll worker. Since I work 8-6 I was going to be contacted about a weekend training class. I haven't been contacted and would like to work at Cobo Hall with the absentee ballots.

Please contact me so that I may finish this process.

Cynthia Cassell  
Extraordinary Person  
248-672-4431 | [cynthiacassell@gmail.com](mailto:cynthiacassell@gmail.com)

**detroitpollworkers@pollchief.com**

Mon, Oct 5,  
5:08 PM

to CYNTHIACASSELL

Hello CYNTHIA CASSELL

Welcome to your elections officer portal. This portal will enable you to indicate that you're interested in working in an upcoming election, to switch yourself from one

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scheduled class into a different class, to review your payroll history, to review previous messages, and to see your work assignment.

To log in, click on this link <https://www.vote4detroit.net/Pollaccess>, enter your user name 824412 and password 110807 in the appropriate boxes, then click on the **Login** button.

This will open your home page:

We recommend that once you've logged in, you click on the "**Change my username**" and "**Change my password**" and change them to something more easily memorable for you.

Then you may want to click **Update/change my personnel information** to add or to change the details we have listed for you.

Since we may be planning more than one election simultaneously, please check the dropdown menu to be sure you are working on the correct election when you click to view your work assignments or your training classes.

To access your portal, please click on the link below. You may wish to save this link to your Favorites bar in your online browser for easy access in the future. Then enter the pre-assigned user name and password.

Link to access the portal: <https://www.vote4detroit.net/Pollaccess>

Pre-assigned user name: 824412 (Don't forget to change it to a user name you can remember).

Pre-assigned password: 110807 (Don't forget to change it to a password you can remember).

Enjoy exploring your poll worker portal.

Sincerely

Detroit Election Administrator

## Poll Worker Check-In - Response Requested

Inbox



**MDOS-DemocracyMVP** <DemocracyMVP@michigan.gov>

Sun, Sep 27,  
11:18 AM

to littlsecr@umich.edu

Hi Cynthia – Hope all is well with you! This is Sally with Democracy MVP. I wanted to check in with you on your status as a Michigan poll worker and to see how the process is going for you! Thanks again for signing up to serve in Michigan and for helping to protect our elections - could you take a look at the below questions and send me a reply as soon as you can?

**Please review this email carefully and provide the requested response.**

**Please respond to this email and let us know:**

1. **Have you submitted your application to a clerk office?**
2. **Which clerk's office did you submit your application to?**
3. **Have you heard back from the clerk on next steps (hiring, training, placement etc)?**

As a reminder, serving as a poll worker in Michigan is a paid position, *not a volunteer position*. To serve as a poll worker, you must be formally hired and trained by a clerk's office.

If you have submitted your application at least one week ago but have not yet heard from the clerk's office on next steps, we want to know so we can be sure you are connected with an office that needs your help! For more details on how Democracy MVP works to connect you with a clerk's office in need, please read "**How does this process work?**" below the line.

If you still need to submit your application, a reminder of your next steps are also listed below the line. **Please submit your application to the clerk's office as soon as possible**. Most clerk's offices in Michigan conduct training in late September or October, so don't miss your window to apply!

We invite you to keep us updated on your election worker journey and also help us recruit more election workers by following and sharing Democracy MVP content on [Twitter](#), [Instagram](#), and [Facebook](#) at @DemocracyMVP.

Sincerely,

**Sally Marsh**  
*Director of Special Projects*  
Michigan Department of State  
Secretary of State Jocelyn Benson

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If you have not yet submitted your application to your clerk's office, your next steps are listed below...

*... but first, I want to explain a bit how this process works.*



## How does this process work?

Democracy MVP helps to match prospective election workers, also known as election inspectors or poll workers, with a clerk's office in Michigan who may hire them to help with elections.

We have listed instructions on how to apply below, but first, there are a few important things to note in order to participate in this process.

- 1. Democracy MVP does not hire poll workers.** Our office serves as a "matchmaker" for prospective election workers looking for a clerk's office in Michigan to work for in November. We provide you with a suggested clerk's office to apply at, and all hiring decisions are made at individual clerks' offices.
- 2. Each clerk's office operates independently from Democracy MVP.** Each clerk's office is also run independently of one another. This means that each clerk handles hiring, training and payment of poll workers differently. Clerks also do not typically share poll worker applications with other clerks, meaning that when you apply with a clerk, you are only applying to serve as a poll worker with that specific location. Once you've submitted your application to a clerk's office, all questions regarding your application status, scheduling, training, polling location placement, and pay rate should be directed to the clerk's office where you applied.

- 3. Our suggested assignments are just that - suggestions!** As a registered voter in Michigan, you are welcome to apply to serve as a poll worker at any clerk's office in Michigan. If you do not wish to work at the location we suggested, you can apply elsewhere.

You can find any clerk's contact details by visiting [Michigan.gov/Vote](https://Michigan.gov/Vote)

- 4. Michigan's poll workers are paid employees, not volunteers.** To serve as a poll worker, you must be hired by a clerk's office and trained. Please do not show up to serve as a poll worker on election day without having first been formally hired and trained by a Michigan Clerk.

If you have general questions or comments about the role of a poll worker, about the process, or if you are having difficulty applying with or contacting your suggested clerk's office, feel free to email us at [DemocracyMVP@Michigan.gov](mailto:DemocracyMVP@Michigan.gov)

## How do I become an election worker?

Your next step for becoming an election worker is to complete the official State of Michigan [State of Michigan Election Inspector Application](#) and submit the full application to your assigned clerk's office for review.

As a reminder, to become an election worker (also known as an election inspector or poll worker) in Michigan, **you must be a registered voter in Michigan** – or if you are between the ages of 16 – 17, you must be a Michigan resident.

**We have listed a suggested clerk's office for you to submit your application, as well as their contact information, in a previous email.** Please note that suggested clerk's office assignments have been made based on areas with the highest need for election workers and proximity, and that our suggested clerk may not be your personal clerk's office.

If you have a strong preference to submit an application to your local clerk over your suggested location, you can find your local clerk's information and office hours at [Michigan.gov/Vote](https://www.michigan.gov/Vote). Just input your name, birth year, and zip code, and, on the next page, select "Local Clerk."

### **Initial Training Video**

Before you attend the local clerk's training and work the polls on Election Day, please view this [introductory election inspector training video](#) from the Michigan Bureau of Elections (it's only about 10 minutes long). It will give you an overview of your role and an introduction to key items to know on Election Day.

You can view the training video here: <https://www.youtube.com/watch?v=u1cavVSNoeY&feature=youtu.be>

### **Can I sign up with a friend?**

Absolutely! While we cannot guarantee you will be selected to work together on election day, we encourage you to ask your friends, family and neighbors to sign up to serve together. If you are hoping to work at the same location, have your friend fill out our online sign-up form at [Michigan.gov/DemocracyMVP](https://www.michigan.gov/DemocracyMVP), and then you can both submit your full and complete State of Michigan Election Inspector Application (link above) to the same clerk's office.

### **What happens after I submit my application?**

Upon submission of your application, all future correspondence regarding your election worker application status, training and next steps will come from the clerk's office. Each clerk's office handles election worker hiring and assignments independently, so our office will be unable to provide status updates on your application once submitted.

**If you have submitted your application at least one week ago, but have not heard back from the clerk's office, please let us know** so we can make sure you are placed in a jurisdiction that needs your help on Election Day.

For questions, concerns or updates on election worker recruitment, feel free to reach out to us at [DemocracyMVP@Michigan.gov](mailto:DemocracyMVP@Michigan.gov) our check out our [FAQ](#) available at [Michigan.gov/DemocracyMVP](https://www.michigan.gov/DemocracyMVP). You can also help us recruit more election workers by following and sharing our Democracy MVP on [Twitter](#), [Instagram](#), and [Facebook](#) at [@DemocracyMVP](#).

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Thanks again for joining the team that is protecting and strengthening our democracy. We are fortunate to have your help in this important endeavor for our state.

Attachments area

Preview YouTube video Democracy MVP Training Video



### November Election Worker Next Steps

Inbox

**MDOS-DemocracyMVP** <DemocracyMVP@michigan.gov>

Sat, Sep 5,  
1:05 PM

to littlsecr@umich.edu

Dear Cynthia,

Thank you signing up to serve as an election worker in Michigan! You are part of an impressive team of thousands from across the state who have stepped up to serve.

**Please find your next steps for becoming an election worker listed below, as well as answers to frequently asked questions.**

Michigan's elections need help in November. You're doing your part - now help us recruit more! After you follow the below steps to become a poll worker, [follow this link](#) to share on Twitter and encourage others to join our team! You can also follow us at Democracy MVP on [Instagram](#), and [Facebook](#).

### **Your suggested clerk's office assignment and next steps:**

Wayne County – Detroit City  
Clerk Janice Winfrey  
2978 W. GRAND BOULEVARD  
DETROIT MI 48204  
313-224 3260

Your next step is to visit the Detroit Poll Worker Portal (link below) and select “Click Here to Apply Online” to submit your information directly to the Detroit City Clerk's Office.

**Detroit Poll Worker Portal: [Vote4Detroit.net/PollAccess](https://Vote4Detroit.net/PollAccess)**

You should hear from the Detroit City Clerk's office within a few days of completing the portal about signing up for a training session.

### **What if I want to work a specific assignment or polling location?**

If you have a request to work a specific assignment, job, or polling location, please communicate this with the clerk's office where you apply. If the clerk's office where you apply is not able to accommodate your request, feel free to notify us and we are happy to refer you to a different clerk's office in need.

All suggested clerk assignments have been made based on highest need areas and proximity, and that the suggested clerk may not be your personal clerk's office. **You may apply in any jurisdiction in Michigan.**

If you have a strong preference to submit an application to a different clerk, you can find your local clerk's information and office hours at [Michigan.gov/Vote](https://Michigan.gov/Vote). Just input your name, birth year, and zip code, and, on the next page, select “Local Clerk.”

### **Initial Training Video**

Before you attend the local clerk's training and work the polls on Election Day, please view this [introductory election inspector training video](#) from the Michigan Bureau of Elections (it's

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only about 10 minutes long). It will give you an overview of your role and an introduction to key items to know on Election Day.

You can expect to hear from our office with further additional training resources as we approach November.

You can view the training video

here: <https://www.youtube.com/watch?v=ulcavVSNoeY&feature=youtu.be>

**Can I sign up with a friend?**

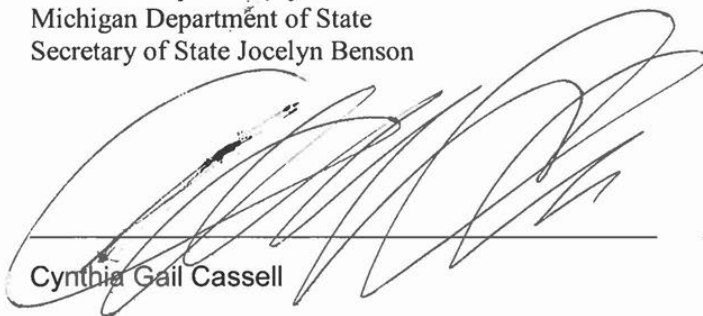
Absolutely! While we cannot guarantee you will be selected to work together on election day, we encourage you to ask your friends, family, and neighbors to sign up to serve together. If you are hoping to work at the same location, have your friend fill out our online sign-up form at [Michigan.gov/DemocracyMVP](http://Michigan.gov/DemocracyMVP), and you can both submit your full and complete State of Michigan Election Inspector Application (link above) to the same clerk's office.

For questions, concerns or updates on election worker recruitment, contact us at [DemocracyMVP@Michigan.gov](mailto:DemocracyMVP@Michigan.gov) our check out our [FAQ](#) available at [Michigan.gov/DemocracyMVP](http://Michigan.gov/DemocracyMVP).

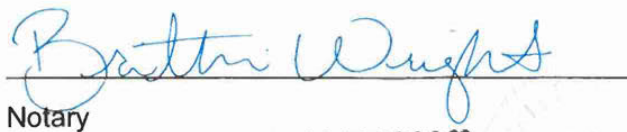
Thank you again for joining the team that is protecting and strengthening our democracy. We are fortunate to have your help this fall.

Sincerely,

**Sally Marsh**  
Director of Special Projects  
Michigan Department of State  
Secretary of State Jocelyn Benson

  
Cynthia Gail Cassell

11-10-2020  
Date

  
Notary

11/10/2020  
Date



**AFFIDAVIT OF RHONDA WEBER**

The Affiant, Rhonda Weber, being first duly sworn, hereby deposes and states as follows:

1. My name is Rhonda Weber. I am an adult citizen and resident of the State of Michigan.
2. I was asked to help provide surveillance of the Department of Elections in the City of Detroit for the November 2020 elections as suspicious activity had been reported there.
3. On election day, November 3, 2020 around 4:43pm on West Grand Blvd., I noticed that a man working for the Department of Elections was on the street and sidewalk collecting absentee ballots in a USPS mail tray. The tray was not secure; it had no lid. It was open and the man would walk around with this open tray on the sidewalk and go into the street with the ballots just loose in the tray.
4. Cars would driveway, roll down their windows, and drop ballots off into the tray.
5. I noticed multiple ballots being dropped off by one person.
6. The man from the Department of Elections simply accepted the ballots in the tray.
7. I saw a black SUV park off West Grand Blvd on the street. A woman with blonde hair had a Tupperware filled with absentee ballots. She had to make three separate trips to dump ballots in the man's USPS tray using her large open Tupperware container. The woman was not wearing anything official and it seems very odd that she would be dropping off this large number of ballots on the street on election day.
8. People who dropped off absentee ballots on the sidewalk or from the street could get free food, drinks, and t-shirts. Groups were stationed before the man with the USPS tray and

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Francis

Cizmar

11/08/2020 Francis Cizmar, being sworn under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit, and if sworn as a witness, am competent to testify to them as well.
2. I am a registered voter in the State of Michigan.
3. On November 4, 2020, I went to the TCF Center as a poll challenger. I was issued credentials when I signed into work.
4. I arrived at 6:00am and left at approx 8:30pm.
5. While I was in the counting area, I <sup>personally</sup> observed the following:
  - A) Provisional ballots were put into a box labeled "votes to be tabulated." I filed an incident report and turned it into the supervisor in the Republican poll challenger office. This incident took place at table 1CC12, Absentee Voter Counting Board 58 at 12:30pm.
  - B) "Problem ballot" boxes containing ballots were left unattended at tables 46, 48, 61, and 62. No election supervisors or poll workers were present.

1 of 6



c) At approximately 3pm, at table 55, a poll worker was seated ~~at~~ at inspector station 5. I personally observed this poll worker shuffling and re-arranging the ballots to be tabulated. This went on for at least 5 minutes. ~~I~~ I did not understand why this was needed, and I did not see the ballots being put into the box labeled "votes to be tabulated."

D) I was present when poll challengers were forcibly removed from the counting room. I recall this taking place about an hour after I was informed that ~~the~~ President <sup>Trump</sup> requested that the counting be stopped when he learned that poll challengers were being denied entry. When these ejections took place, there was a lot of shouting of approval and applause ~~in the~~ from the poll workers and election supervisors in the room.

E) At approximately 1pm, I was standing near the entrance to the counting room. About 15 feet in front of me was a group of three men, one of whom had a crutch. The men were about 6 feet tall. The man with the crutch took out his phone, held it up above his head, and began videotaping the area where the tabulating machines were located.

E) continued. The man took a video of about 10 seconds, then put the phone in his pocket. The group of three men turned to face me. I did not see any type of identification or party affiliation on any of them. I walked swiftly to an election worker and reported what I saw, which was the video taping in the area where pictures and videos were forbidden. When the three men came close to this election worker and me, the election worker told the men that videos and pictures were not allowed in the counting room. One of the men replied in a harsh tone "we didn't take any pictures or videos." The election worker replied "don't do it again" but did not ask the man to delete the video.

F) I witnessed a poll worker at inspection station 2 locating the record of an absentee voter using the Electronic Poll Book on a laptop computer. I was standing approximately 3 feet behind her to her right. After she scanned the envelope, no record came up. She then started typing the voter's name into the electronic poll books. The date of birth field was blank. The poll worker

F) Continued: typed 01/01/1900 into the date of birth field. This would indicate that the voter would be 120 years old. Certainly possible, but improbable. I challenged this record. The Election Supervisor came to the table and told the poll worker to delete the record. I could not confirm if the record had been deleted. The ballot number was 06366.

G) When the military ballots were starting to be transcribed, it was about 7pm. I was at a table where a military ballot was being transcribed. There was one person speaking the vote choice on the military ballot to another poll worker to her right who was copying the vote choices onto a standard ballot. There was a person without any identification and dressed as a regular person without a department of elections shirt/blouse on. One of the table poll workers came to my right and told me to maintain a 6 foot distance. I replied that the 6 foot order was relaxed. She insisted that I back away. I asked who this person standing between me reader and copier was. I was told she is a poll worker who needed to monitor the process. The person without poll worker credentials had both

G) Continued: elbows out to her side, preventing me from observing the ballot copying. The person who told me to keep a six foot distance said that if I did not comply I would be evicted. I left ~~the~~ the table to find another one so I could remain in the counting room. I felt very intimidated.

H) When the military ballots began to be distributed to the counting tables, Election Supervisors would grab 2, 3, maybe 4 at a time, which made it impossible for us to cover all of ~~the~~ the ballot transcribing. I believe that this was done on purpose.

I) The counting room supervisor would announce over the PA system that he needed to meet with Election Supervisors and Table Leads many times during the time I was in the counting room. This was very distracting to those of us trying to concentrate on what was going on at the tables we were trying to monitor.



Francis J. Cizmar

248 989 3013

francisjczmar@gmail.com

5 of 6

Pat

Colbeck

**STATE OF MICHIGAN**  
**IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE**

---

**CHERYL A. COSTANTINO and EDWARD P.  
McCALL, JR.,**

**Plaintiff,**

**AFFIDAVIT OF PATRICK J.  
COLBECK**

**-vs-**

**CITY OF DETROIT; DETROIT ELECTION  
COMMISSION; JANICE M. WINFREY, in  
her official capacity as the CLERK OF THE  
CITY OF DETROIT and the Chairperson of  
the DETROIT ELECTION COMMISSION;  
CATHY M. GARRETT, in her official  
capacity as the CLERK OF WAYNE  
COUNTY; and the WAYNE COUNTY  
BOARD OF CANVASSERS,**

**Defendants.**

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**FILE NO: 20-\_\_\_\_\_ -AW**

**JUDGE**

**David A. Kallman (P34200)**  
**Erin E. Mersino (P70886)**  
**Jack C. Jordan (P46551)**  
**Stephen P. Kallman (P75622)**  
**GREAT LAKES JUSTICE CENTER**  
**Attorneys for Plaintiff**  
**5600 W. Mount Hope Hwy.**  
**Lansing, MI 48917**  
**(517) 322-3207/Fax: (517) 322-3208**

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**AFFIDAVIT**

The Affiant, Robert Cushman, being first duly sworn, hereby deposes and states as follows:

1. My name is Patrick J. Colbeck, I was a poll challenger for the November 3, 2020 election, and I am a resident of Wayne County.
  
2. At approximately 5:30pm on November 3, 2020, I asked Daniel Baxter if Tabulation Computers were connected to internet. Mr. Baxter said simply "No."

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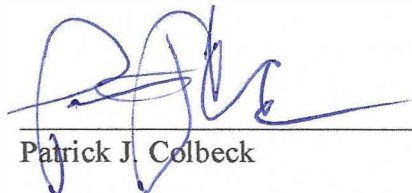
3. At approximately 5:45pm on November 3, 2020, I first asked Chris Thomas how the tabulated results were to be transferred to the County and other parties. He said he didn't know, but he would find out. I repeated this inquiry throughout the evening until Mr. Thomas responded that he would not be able to release that information until the end of the next day. Early during the morning, I was able to look at a copy of the Detroit Election manual which specified that the tabulated votes would be copied from the adjudicator computers to a series of flash drives.

4. At approximately 7:30pm on November 3, 2020, about 50% of Poll Workers left the AV Counting Board before 8pm in violation of MCL 168.792a(11). An announcement was made by Detroit Election Officials at 7:45pm calling them back but most had already left the AV Counting Board area.

5. At approximately 11pm on November 3, 2020, I asked David Nathan if any of the computers were connected to the internet. He said "No." When I asked for confirmation, he said "Trust me." I stated that he may have been misled. When I pressed for a demonstration, he repeated "Trust me." All it takes to confirm the connectivity status of a Windows computer is to roll the cursor over the LAN connection icon in the bottom right corner of the display. When there is no internet connection, a unique icon showing a cross-hatched globe appears. I proceeded to review the terminal screens for the Tabulator and Adjudicator computers and I observed the icon that indicates internet connection on each terminal. Other poll challengers can attest to this observation as required (e.g. Kristina Karamos and Randy Bishop).

6. Sometime during the evening I proceeded to examine the physical cabling connections between all of the computers in the facility. The results of this observation are captured in the attached network topology diagram. The IT technician stationed on the stage actively discouraged any close-up observation of the network. Phone usage ban discouraged taking photographs of equipment. There were no observed ethernet connections for Electronic Poll Books at AV Counting Boards, but Wi-Fi Routers were present with attached active Wi-Fi networks in area including one called "AV\_Connect" and a separate one for "CPSStaff" which were both of sufficient signal strength to be accessed outside of the Counting Board as well as inside. I did not confirm presence of internet connection for Electronic Poll Books but the "security incident" at 10am on 11/3 would seem to indicate that they were connected to internet via Wi-Fi.

7. Further affiant says not.



Patrick J. Colbeck

Bob

Cushman



**STATE OF MICHIGAN**  
**IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE**

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**CHERYL A. COSTANTINO and EDWARD P.  
McCALL, JR.,**

**Plaintiff,**

**AFFIDAVIT OF ROBERT  
CUSHMAN**

**-vs-**

**CITY OF DETROIT; DETROIT ELECTION  
COMMISSION; JANICE M. WINFREY, in  
her official capacity as the CLERK OF THE  
CITY OF DETROIT and the Chairperson of  
the DETROIT ELECTION COMMISSION;  
CATHY M. GARRETT, in her official  
capacity as the CLERK OF WAYNE  
COUNTY; and the WAYNE COUNTY  
BOARD OF CANVASSERS,**

**Defendants.**

---

**FILE NO: 20-\_\_\_\_\_ -AW**

**JUDGE**

**David A. Kallman (P34200)  
Erin E. Mersino (P70886)  
Jack C. Jordan (P46551)  
Stephen P. Kallman (P75622)**

**GREAT LAKES JUSTICE CENTER  
Attorneys for Plaintiff  
5600 W. Mount Hope Hwy.  
Lansing, MI 48917  
(517) 322-3207/Fax: (517) 322-3208**

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**AFFIDAVIT**

The Affiant, Robert Cushman, being first duly sworn, hereby deposes and states as follows:

1. My name is Robert Cushman. I am an adult citizen and resident of the State of Michigan.
2. I served and was trained to be a poll challenger for the November 2020 election in Detroit, Michigan.

3. During my observations of the normal processing of ballots on November 4<sup>th</sup> between about 7:45 a.m. and 8:30 a.m. I was substantially obstructed from performing my challenger duties of observing and making notes at Board Number 31. The persons involved either directly or indirectly involved: 1. A worker named Joe, 2. A supervisor named Miss Browner, 3. an unknown person with no credentials, 4. a Democratic Challenger with credentials and one of the AVCB leaders named David Nathan.

4. On Wednesday, November 4, 2020, Detroit election officials told us that they were going to process military ballots last. I did my best to try to observe the processing/duplication of the military ballots.

5. On November 4, 2020, I was surprised to see numerous new boxes of ballots arrive at the TCF Center in the evening. I first noticed these boxes in the distribution area after many of the military ballots had been distributed and processed. I estimate these boxes contained several thousand new ballots when they appeared.

6. The main list of persons who had registered to vote on or before November 1, 2020, was listed on an electronic poll book, often referred to as the QVF. As I understand it, the Supplemental Sheets were the lists of persons who had registered to vote on November 2, 2020 or November 3, 2020.

7. I observed that none of the names on these new ballots were on the QVF or the Supplemental Sheets.

8. I saw the computer operators at several counting boards manually adding the names and addresses of these thousands of ballots to the QVF system.

9. When I asked what the possible justification was to counting ballots from unknown, unverified “persons,” I was told by election supervisors that the Wayne County Clerk’s Office had “checked them out.”

10. I challenged not one ballot, but the entire process as the names were not in the QVF or Supplemental Sheets and because the DOB’s were all wrong, all being marked as 01-01-1900.

11. An Election Supervisor near board number #86 advised me to go to the podium of election officials and ask one of them to help me. I did, and I enlisted the help of one of the leaders, a young man named Anthony Miller.

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12. Mr. Miller walked me back to board number #86 and asked what I wanted the challenge to say. I said that I did not want to challenge just one ballot, but the entire process, as I was witnessing several thousand ballots inputted illegally.

13. Mr. Miller advised the computer operator what to type in as a challenge so that it was part of the Official Record in the Poll Book for Board Number #86.

14. I challenged the authority and the authenticity of all of these ballots that were being processed late with absolutely no accompanying documentation, no corresponding name in the QVF, and no corresponding name in the Supplemental List.

15. Every ballot was being fraudulently and manually entered into the Electronic Poll Book (QVF), as having been born on January 1, 1900. This "last" batch of ballots was processed in the 8:00 p.m. to 10:00 p.m. time frame.

16. When I asked about this impossibility of each ballot having the same birthday occurring in 1900, I was told that was the instruction that came down from the Wayne County Clerk's office.

17. Mr. Miller was very clear about these late ballots and that the instructions were coming from the Wayne County Clerk's office.

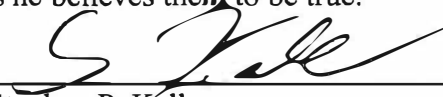
18. I was surprised and disappointed at the preponderance of dishonesty, irregularities, and fraudulent tactics at the November 3, 2020 election at the TCF Center.

19. The above information is true to the best of my information, knowledge, and belief.

20. Further affiant says not.

  
Robert Cushman

On this 7th day of November, 2020, before me personally appeared Robert Cushman, who in my presence did execute the foregoing affidavit, and who, being duly sworn, deposes and states that he has read the foregoing affidavit by him subscribed and knows the contents thereof, and that the same is true of his own knowledge and belief, except as to those matters he states to be on information and belief, and as to those matters he believes them to be true.

  
Stephen P. Kallman  
Notary Public, Eaton County, Michigan  
My Commission Expires: 11/26/2025

Kathleen

Daavettila

AFFIDAVIT OF Kathleen Daavettila

I, Kathleen Daavettila , being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. I am a registered voter in the State of Michigan.
3. On September 23, 2020 my husband and I filled out and sent in applications to work in the Detroit election for the November 3, 2020 presidential election. On the application we specified that we are not flexible to work at any polling site and would like to work at the TCF center absentee voter count board.

On October 1, 2020 both my husband and I received a voicemail from Will Griffin at the City of Detroit Elections Department, calling to let us know that our training was scheduled for October 6, 2020 at 1:30pm, and that the location of the training was the northwest Wayne County Community College Campus located at 8200 West Outer Drive, Southfield, MI and that I would be in room 101G.

On October 1, 2020 I arrived for the training at said location. Upon arrival I was told that the training was moved to a different building, which it was. When I got to the training location, I was asked where I was told to go, and I told them room 101G, so I was sent to the coordinating room at the new location. At the introduction of the training the instructor informed us that we will be working as Electronic Poll Inspectors. I raised my hand, and I asked, "What about absentee ballot counting at the TCF center, that is what I signed up for." The instructor then told me that they needed 1,100 people to work at the absentee counting board TCF center and they filled them right away, so there is no need for them right now. But that I could call 313-876-0227 and tell them when I signed up and ask where I am on the list. After this I left the training. As soon as I got out to my car, I called the number, and it rang and rang and

rang with no answer. I called multiple more times that day, and the next day, each time with no answer, and no going to voicemail.

On Wednesday November 4, 2020 my husband and I went down to the TCF absentee counter board in response to the call for more Republican poll watchers/challengers. After getting our credentials we went into the absentee counter board room. The room was larger than a football field with people everywhere. While I was in line in to check-in in the counting room, I started talking to someone in a group that was wearing our yellow GOP wristband. They had a packet of instructions with the heading relating to, "Tactics to Distract GOP Challengers", which he let me borrow to read, unfortunately I didn't get time to read anything else on it. Another man in the group started telling me, "our main job is to distract and disrupt the GOP challengers," then a woman in the group grabbed the packet of papers from my hands and said, "no, no, no, she's a republican, she doesn't need that, bye, bye."

When we checked in, we had to write our party affiliation, our name, and the time that we checked in, looking at the sign in sheet, there were over 10 times the amount of democrats than there were republicans (this was verified as we checked out later, when the person working at the table had to flip through many pages to find my name to check me out.)

The atmosphere in the room was very hostile towards me. Numerous times I had poll workers and democrat challengers screaming at me, if I took a step closer to the table to get a better view of the ballot, if another republican walked by the table or stopped to ask me a question, if my mask started to slip and show the top part of my nostril, multiple times I was told I was going to get kicked out if any of those things happened again. At one point when I was challenging a ballot where the ballot number in the computer did not match the ballot number on the ballot and envelope, the poll worker did not write that I challenged the ballot in the remarks, so I kindly asked if they needed to write my name that I challenged the ballot, as they had previously. When I

asked, about 4 or 5 democrats that happened to be right next to the table (remember I was hollered at if even one other republican even walked close to the table while I was standing next to it) started screaming at me that I am not allowed to talk to the workers at the table. A couple of minutes later a male supervisor came to our table and started hollering at me that I am not allowed to talk to the workers or interfere with the process, and that I am going to be kicked out if I do that again. I kindly apologized to him and I did not say a single word nor even make eye contact with anyone at the table for the remainder of the time that I was there.

On the contrary, multiple other democrats stopped to visit with the democrat challenger at the table, one even stood right next to her as they both watched the screen together and talked about the ballot. Nothing was said by ANYONE to them about having more than one democrat at the table. I did not say anything as I did not feel safe to (I am a small (5'3" 130lb) pregnant white woman), for fear of getting screamed and hollered at if I opened my mouth. Also, about a half an hour after the supervisor stopped to holler at me about saying something to the table worker, both the "non-partisan" and democrat challengers huddled next to the worker at the computer who was scanning the ballots, and talked to them for at least a minute. Again, I did not say anything for fear of being screamed at.

I found it interesting that every ballot that I challenged where the computer ballot number and the ballot and envelope number did not match up, the partisan challenger nor the democrat challenger ever challenged the ballot.

Each ballot that I challenged, a remark was noted in the computer that the numbers did not match up, and then the ballot was processed anyway.

Also, the entire time that I was at the TCF center, I did not see a single signature verified by any registration document.

Around 3pm more and more police officers started to show up. Around this time the doors

to the room were closed and they would not let anyone else into the room, and the windows into the room started getting covered with cardboard and paper. It was also around this time that the GOP issued a lawsuit to stop counting ballots. It started to feel more unsafe in the room, people started chanting, "stop the count!" while others chanted, "keep the count!". They continued to count ballots, I let the supervisor know that every ballot counted past the time of the lawsuit I am challenging. The supervisor said that after the process all of the ballots, they will make a blanket remark stating that all ballots after that time are being challenged.

I was not treated with respect by a single person that I had interaction with (whether I wanted that interaction or not, with random democrat challengers hollering at me) except for one male supervisor, that I spoke with when I was challenging every ballot after the lawsuit was filed.

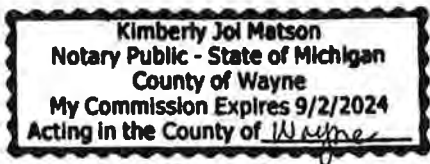
Let it be known, that I did not respond to a single person who hollered or screamed at me except for when I kindly apologized to the supervisor after I had spoken to the poll worker who had not written that I challenged the ballot.

Between 3pm and 3:57pm I witnessed three white males being thrown out by the police (all on separate occasions,) each time it happened, the entire room burst out into cheering and clapping. The outbursts that I heard around me when this happened was, "must be a Trump supporter!"

My husband and I checked out at 3:57pm, as I was in fear of safety for myself and my unborn baby. We wanted to leave before the hostility escalated any further. After we checking out, we had to leave through a back exit, directed by police.



Dated: November 8, 2020



Kathleen Daavettila 11/8/20  
Kathleen Daavettila

906 281-1635

Subscribed and sworn to before me on: 11/8/2020

1st Kimberly Matson

Notary public, State of Michigan, County of:

My commission expires:

9/2/2024

Adam

deAngeli

**AFFIDAVIT OF ADAM de ANGELI**

The Affiant, Adam de Angeli, being first duly sworn, hereby deposes and states as follows:

1. I am an adult citizen of the United States and a resident of Michigan.
2. I declare under penalty of perjury that the foregoing is true and correct.
3. I served as a poll worker in the City of Detroit on November 3, 2020.
4. I have been a Republican Party precinct delegate since 2008. Since getting involved in politics, I have worked on numerous campaigns, serving at various times in every role from volunteer to senior consultant.
5. I have been a campaign manager, treasurer, press secretary, information technology director, and state campaign manager for a presidential campaign.
6. I have been a poll challenger and an election day operations coordinator. I was also a challenger in a recount.
7. I worked in the U.S. House of Representatives as a legislative assistant for more than a year, and in the Michigan House of Representatives as a senior legislative assistant for more than three years. In these capacities, I became very familiar with Michigan elections.
8. I registered to become a poll worker for the City of Detroit on September 1, 2020 using the City of Detroit website: <https://detroitmi.gov/departments/elections/become-election-day-pollworker>. Neither the web page nor the application contained an email address or even mailing address where the application was to be submitted, so I called the Department of Elections and asked if there was a way to submit my application electronically. I was told I could apply online at “vote4detroit.net”.

9. I advised the elections official that there was no application at the website; nothing but a login screen. He responded: “That’s strange. The website was supposed to be open today. Maybe they’re still working on it. You can try again tomorrow.” The web page appears to remain unchanged as of November 8, 2020 and the page is archived at <https://web.archive.org/web/20181127073658/https://www.vote4detroit.net/>.

10. I ended up driving to the Department of Elections at 2978 W. Grand Blvd in Detroit and delivered my application in person. At the Department of Elections there was a man behind a counter and two women speaking with him. The man asked if I was there to apply to be a poll worker; I said yes and presented my application. He took it from me and thanked me. However, I later received no response from the Department of Elections, not even an acknowledgment of receipt.

11. After hearing no response in weeks, I eventually applied to be a poll worker in Oakland County. The County Clerk Department of Elections’ website featured a link to the poll worker application. The form included an email address to submit applications. I received prompt acknowledgement of receipt and received a phone call to schedule training within 48 hours of applying.

12. Three weeks from the date I first applied to be a Detroit poll worker, on September 22, I received an email from a friend indicating that an online registration form was discovered at this address: <https://www.vote4detroit.net/Pollaccess/PollWorkerReg.aspx>. I applied the following day and immediately received an automated email attached, including a login link, username, and password.

13. I opened the link and logged in successfully. The home page displayed top-level tabs: “Home”, “Training”, “Work Assignment”, “Messages”, and “Questions/Comments”. The

“Home” page contained links for “Edit My Personal Information”, “View Work History”, “Update Username/Password”, and “Review Training Materials.” The “Review Training Materials” link took me to a page with no training materials. The “View Work History” page was blank. The “Training” and “Work Assignment” pages were blank. The “Messages” tab contained only one message, identical to the automated email I had received, and the “Questions/Comments” tab led to a web form for submitting questions and comments. Essentially, there was no information on the web page.

14. On October 13, 2020 at 11:38am, a man, who introduced himself as from the Department of Elections, called from the phone number 313-876-0261, identified on my phone’s caller ID as “Skalski Anntt”.

15. The individual from the Department of Elections asked if I have taken my poll worker training. I replied that I had not heard from anyone with the City of Detroit since signing up three weeks ago and was not aware of any training.

16. The individual from the Department of Elections said trainings were available the next day at 10am, 1pm, 5pm.

#### **TRAININGS OCTOBER 14th and 15th, 2020**

17. I arrived for training the next day, October 14, 2020, at Wayne County Community College at 8200 Outer Drive West in Detroit at 1:00pm. I was asked what I was there for, and I responded I was there for poll worker training. The training took place on the third floor; the room number was an even number approximately 324. No one asked for ID or credentials.

18. Training began at 1:42pm. I recorded the training for the main purpose of listening to it again before Election Day to remind myself of any important information. I was acting in an official capacity as a poll worker and the training appeared to be a public meeting.

19. The trainer noted that we were to request six feet of space from any poll challengers. The trainer recognized this distance would make it impossible for poll challengers to perform their duties and could create a confrontational environment conducive to a law enforcement intervention.

20. When I arrived home, I logged into the poll worker website. I noticed I had a new message, dated October 13, 2020 01:13pm (95 minutes after the call I had taken the prior morning). The message was sent from Yvonne Brookins with the subject line "STRIKE TEAM." The message contained credentials authorizing me to work as a "SUBSTITUTE POLLWORKER." Under the "Work Assignment" tab, it now stated that my assigned job title was "-EPI". (Electronic Pollbook Inspector).

21. This meant I had been sent to the wrong training: I had attended the standard poll worker training for ballot inspector and ballot box inspector. The Electronic Pollbook Inspector was a different role: The EPI uses the laptop pollbook to process ballot applications and record the issuing of ballots.

22. At approximately 5:00pm, I used the "Questions/Comments" tab to indicate that I had taken the wrong training and asked about receiving the correct training. Shortly after sending the message, it occurred to me that I might not receive a timely reply. I checked the "Training" tab for a list of upcoming trainings. It displayed approximately ten events coming up in the week ahead, but all of them were listed as "precinct chairperson training." There were no upcoming EPI trainings listed. I remembered from the initial phone call with the individual from

the Department of Elections that trainings were going to be offered at the same times the following day.

23. Therefore, on October 15, 2020 at 1:00pm, I returned to the same location to take EPI training. The check-in attendant asked if she had seen me the day before. I told her I had taken the wrong training and needed to take EPI training. For the same reasons as before, and because I was taken aback by the comments the prior day, I recorded this training.

24. On October 15, 2020, the two trainers identified themselves as “Andrea and Miss Tyra.” Andrea was wearing a City of Detroit employee uniform shirt with an embroidered nametag identifying her as “A. Johnson.”

25. The training began with a lecture regarding from Andrea. Miss Tyra took over and lectured for the remainder of the training and discussed the use of the electronic pollbook computers.

26. Most of the training consisted of basic instructions for performing the jobs we were assigned. There were, however, moments I found remarkable.

27. I was instructed to tell poll challengers to stay away from me. An hour and thirty-six minutes into the training, I heard the following exchange:

Miss Tyra: They have to wear a mask and they have to stay six feet. That's important because they can come behind your table, but if you don't have six feet, they can't come back there. [...] Any questions?

Trainee: So, if they're six feet back, they can't actually see.

Miss Tyra: Exactly! Unless they got reeally good vision or they brought their binoculars

[Laughter]

Miss Tyra: Six feet. That's the rule, right? And you are entitled to your six feet!

28. Miss Tyra then encouraged poll workers to “call 9-1-1”, “call the police on ‘em,” and “have ‘em thrown up out of there.”

29. In both trainings, poll challengers were trained that poll workers could strictly enforce social distancing rules that would prevent challengers from coming within six feet of them,

30. On the October 15, 2020 EPI training, Miss Tyra indicated that she was happily aware this would impede poll challengers’ ability to perform their duties.

31. Based on my observations with just signing up and being trained, I believe that there was no way for a member of the general public to be reasonably expected to figure out how to even *apply* to become a poll worker in the City of Detroit.

32. A Department of Elections official was unable to direct me to the online application. After providing me a faulty web address, I was either incorrectly or falsely advised that I could simply wait until the address would work.

33. I was *only* able to successfully apply to become a poll worker because I had been given the link to the online application—an unlisted page on an unlisted website—by someone “in the know.”

34. I still do not know why I received an email with the subject line “STRIKE TEAM.”

35. As noted above, I attend two distinct training sessions: first for poll inspector; then for electronic pollbook inspector (EPI). I audio-recorded the trainings of the October 14th and October 15th, 2020; a true and correct copy of the recordings are attached.



36. We were furnished printed packets of training materials. The October 14 training packet is attached.

37. I am familiar that on October 16, 2020, the Secretary of State issued an updated guidance document that stated:

“Challengers / Poll Watchers: While challengers’ [sic] and poll watchers’ [sic] have their rights and responsibilities established under law, election workers can strictly enforce requirements that they observe proper social distancing.” (“Polling Place Safety and Accessibility”, Michigan Department of State, Bureau of Elections, updated 10/16/2020) I do not know whether this guidance appeared in earlier versions of the document.

38. In both trainings, it was emphasized that, unlike prior elections, the City of Detroit overstaffed and received more applications than needed. However, it was emphasized that “many” of the Electronic Pollbook Inspectors were minors that would be unable to discharge their duties to accompany the precinct chairperson to the Receiving Board.

39. In the October 14 training, this was noted in discussion of pay. Trainees were informed that they could make an extra \$50 if they joined the precinct chairperson in delivering the critical election materials—including the poll book, the laptop, the results tapes, tabulator SD cards, and of course, the transfer case containing the ballots-- “but I stress,” the trainer said, “you can only do this if your EPI is a teenager. Many of our EPIs will be teenagers, who can’t work until 2, 3 o’clock in the morning.” She then emphasized, however, that it was a lot of work for little pay: the benefit of being a lowly ballot inspector is that you could go home as soon as the polling place was closed. Those going to the Receiving Board could expect to be there “all night”: 2:00am, 3:00am, or later.

40. In the October 15 training, this was noted to inform the teenaged boys constituting the majority of trainees that they needed to notify their precinct chairperson early in the day if they were unable to deliver the materials to the Receiving Board (“because it’s late, right?” not said: due to work restrictions on minors). They could be there as late as 1:00am, she warned them.

41. It seemed notable to me that, while on one hand it was so difficult to impossible for members of the public to even find out how to apply, a large number of teenagers were recruited to work the polls and assigned with particularity to be electronic pollbook inspectors.

42. On the applications to work for the City of Detroit, applicants were required to list party affiliation. “Independent” or “non-partisan” was not an option. Upon knowledge and belief, clerks are required by law to hire an equal number of Democrat and Republican poll workers. However, Michigan does not have partisan voter registration, so this process is subject only to the affirmation of applicants, and minor employees being ineligible to vote would have no record to check against anyhow.

43. In the October 14 training, it was emphasized that, although there would be phone numbers to call for troubleshooting on Election Day, we would be unlikely to get through to anyone. “Honestly speaking,” the trainer said, “it’s going to be hard to get ahold of someone, because there’s going to be 10 people calling us at the same time.”

44. In the October 15 training, we were trained to deceive voters that were listed in the poll book as having already voted absentee but who insisted they had not. We were advised to issue them a provisional ballot “to quiet them down” that would not be tabulated but would instead be destroyed by the Department of Elections.

45. The trainer said the following:

Miss Tyra: There's no reason for him to vote again. At all. Ever-- that day. He's done. But what if he gets what? Loud! Rude! (impersonating voter) "That's not me! I didn't vote! I want to vote!" And just acts the purest, right? What can you do, besides call your chairperson? That's what you should do. Call your chairperson. Your chairperson can issue him what type of ballot?

Trainees: "Provisional!"

Miss Tyra: A provisional envelope! Why?

Trainees: "Because he wants to vote."

Miss Tyra: But why a provisional envelope? Where's it going? Not in the tabulator! It's going in that envelope, right? We have how many days? Six! So, what is the Department of Elections going to do with it?

Trainees: Throw it out.

Miss Tyra: Destroy it! He's already voted. The people are going to try to test the system. And some of them are going to act the . . . and 9-1-1 is always an option, right? It's always your first option. But if they just insist, "that's not me, I didn't do that, I don't know who did that, that's not me" that is an option. The last resort is to call your chairperson, and have them do the envelope, vote it because that quiets him down, that gets him out, and it doesn't what? It doesn't count. He doesn't know that, does he? Does he?

Trainees: No.

Miss Tyra: No. He doesn't know that.

46. This training struck me because I was not apparent to what the "six" days referred. This was a clear and specific directive to mislead a voter in the event that the voter was

listed as having already voted absentee. While a voter that already voted absentee certainly should not be allowed to vote a second time, it struck me that there was a distinct possibility that an absentee ballot could be have stolen or the system was otherwise incorrect, and the proper procedure would be for all provisional ballots to be carefully reviewed, not simply destroyed. I would think all ballots, including rejected ballots, should not be destroyed in any event.

47. In the October 15 training, we were advised of the process for issuing ballots to voters that were not listed in the poll book because they had only registered to vote in the past three days pursuant to the new policy that eligible people could register to vote up to and on Election Day. According to the training, the voter would “hopefully” have a receipt from the clerk’s office indicating that he or she was a newly registered voter. As shown in the training manual on Page 17, the receipt would either direct the poll workers to issue a regular ballot, or a challenged ballot. No explanation was given as to why a voter would be given one or the other. The sample receipts shown in the manual did not appear to include security devices of any kind.

48. It struck me that anybody could submit a forged document and be issued a regular ballot, which once inside the tabulator would be anonymous and irrevocably counted. After the training I asked other election officials if this was their policy as well. A township clerk, of Oakland Township, told me that her staff were directed to call the clerk to verify these receipts. The York Township clerk said she was embossing receipts with the township seal.

49. The Detroit officials gave no indication that any such safeguards would be in place, and indeed, as noted above, we were actually advised that it would be difficult if not impossible to get ahold of a higher-level election official for any reason.

50. Also, in the City of Detroit trainings, the description of the ballot challenge process was bizarre both for what was said and what was unsaid. We were told that challenged ballots were not to be separated into a challenged ballots envelope.

51. Instead, we were to write the ballot number on the stub onto the ballot itself, cover up the ballot number with white Post-It tape, and feed the ballot into the tabulator. Upon knowledge and belief, this was a statewide policy. Knowing that tabulated ballots are kept in a locked transfer case that is only ever opened in the event of a recount, I concluded that all challenged ballots are presumptively counted and could only be un-counted later in the event of a recount.

52. What was *unsaid* in either training was when this should be done, other than in the event described above where a voter presents a late registration directing us to process it as a challenged ballot. In fact, we were advised in both trainings that poll challengers can challenge a process or challenge a voter's eligibility; however, it was indicated that unless we discovered an error on our part, we were to disregard to the challenge and process the voter as normal.

53. I posted the complete audio recordings of both trainings and the training material packets on the Web at: <http://theadamd.com/affidavit/>

54. The statements made at the training events compelled me to share this information with others. I provided the recording to individuals who became plaintiffs in a lawsuit against the Secretary of State and Director of Elections over the poll challenger social distancing requirement. The case was 20-000211-MZ in the Court of Claims, filed on October 23.

55. An emergency motion for temporary restraining order was heard on Wednesday, October 28. The hearing was published on the Court of Claims' YouTube channel, on the web at <https://www.youtube.com/watch?v=wrosDhuGpYE>. In the hearing, the parties announced that

they had reached a settlement to change the policy to allow for poll challengers to come within six feet of poll workers as needed to perform their duties. The settlement further stipulated that the State would “provide this amended directive to local election officials in a manner most likely to ensure timely receipt”. The proposed final order is attached.

56. I never told or trained that poll challengers could come within six feet to complete their work.

57. On November 2, 2020, the day before the election, I logged into the poll worker website to find that I was now assigned to be a ballot box inspector at Precinct 366 located at Henderson Upper School at 16101 Chicago Street in Detroit. I wrote down the location but neglected to record the precinct number, erroneously thinking the street address was sufficient.

#### **ELECTION DAY NOVEMBER 3, 2020**

58. When I arrived at the school at 5:45am, I discovered there were polling stations set up for 5 precincts in the room. I located the polling site assessor, Caroline, who was in charge of the entire location. She was too busy to speak to me. There was no sign-in sheet, no list of who was assigned where, and nobody checked my credentials. After standing around uselessly for about 5 minutes, I saw a sign for precinct 374, which sounded right to me, and offered to help them set up. This precinct had two individuals, Eric and Keith, both serving as precinct chairperson for the day. I was the only one in the group assigned to be ballot box inspector, so I performed the job at that location for the entire day. At any rate, no other precinct appeared to be short-staffed.

We were given nametag stickers to wear throughout the day. Some were blue and some were red. While these were possibly intended to distinguish between Democrat and Republican poll

workers here were no instructions to use them as such, nobody appeared to be aware of the rule and it appeared that coworkers chose them randomly. The password for the tabulator was the date: “11032020.” The passwords we used in our trainings had been the dates of prior elections, e.g. “08042020.” I noted that the usage of the most obvious possible password, which was printed on the laminated instruction sheet attached to the tabulator anyway, essentially rendered this security device meaningless.

59. As we began processing voters, it became immediately obvious that there no concern for voters’ privacy, neither from the staff nor the voters themselves. The secrecy sleeves for the ballots were several inches too short for the paper, so I invariably saw the top few lines of every ballot as I tore off the stubs. About halfway through the day, we discussed this, and Eric or Keith decided we should re-fold the sleeve to make it cover the front side at the expense of coverage of the back, but ballots were often presented to me upside-down, backwards, or outside the sleeve altogether.

60. On at least three instances, voters would enter another’s voting booth to “help” the voter. In two cases it was a wife helping a husband; in another it was a mother helping her daughter.

61. In the second instance, the husband’s ballot was rejected by the tabulator, which refused to accept any ballots with stray marks or incomplete ovals, resulting in the need to spoil the ballot and issue a new one. After having spoiled the ballot, the wife, who had just completed her own ballot, took the husband’s new ballot and simply completed the entire ballot for him.

62. I asked our precinct chairpersons if it was proper for voters to be in others’ voting booths and, in that case, voting for him. I was advised that family members are

permitted to help them vote. “Isn’t that a problem for voter privacy?” I asked. “What if someone is being pressured by a family member to vote a certain way? Isn’t the whole point of the privacy of a voting booth that a voter cannot feel pressured to vote a certain way?” They acknowledged I had a point but were pretty sure about the policy and continued to allow family members to “help” voters at their voting booths.

63. Almost every voter entering the polling site carried and displayed leaflets, some for individual candidates and others that were “cheat sheet” instructions. We soon discovered they were very frequently left inside the voting booths for the next voter to find and began checking after each voter to retrieve and throw out the campaign materials.

64. Upon taking my first break, I discovered that there were piles of campaign literature at the windowsill in the hallway, in the bathroom, and on the table next to the sanitation station. Outside the entrance, campaign workers were distributing the literature to voters as they entered.

65. Unlike other locations I’ve worked in prior elections, there was no “100 foot” marking cone to indicate the limit from the entrance where electioneering was allowed. Furthermore, Michigan’s election law requires campaign workers to be 100 feet from *all* building entrances, not just the main entrance, and the campaigners were less than 20 feet from another building entrance and 10 feet directly in front of an exit.

66. I asked my precinct chairpersons about the voters displaying literature. “Isn’t that inappropriate?” I asked. “Isn’t that no different from a voter displaying a candidate’s name and logo on his shirt?” I was advised that it was not inappropriate.

67. Poll challengers arrived at our precinct at approximately 9:00am. We had received no revised guidance with respect to the 6-foot rule having been amended by the



Secretary of State, and nobody seemed aware of it. The poll challengers themselves spent most of the day at the far end of the check-in table, which was less than 6 feet from the wall.

68. At approximately 3:00pm, our polling site was visited by Marian Sheridan of the Michigan Republican Party who saw the campaign literature in the polling area and stated, “They are not allowed to do that,” she said. Marian requested that the precinct chairperson note in the poll book that most voters were displaying campaign materials inside the polling site, which I believe he did.

69. We had at least one instance where I noticed a voter was issued a ballot who was not listed in the poll book. When I heard about this, I asked the Electronic Pollbook Inspector what had happened. She indicated that she was able to verify the voter’s eligibility by visiting the Secretary of State website (mi.gov/vote) on her phone and entered the voter’s information. She represented that the voter was listed on the website as being registered in the precinct. She said he was added to the poll book as a registered voter not in poll book and was given a regular ballot.

70. After the polls closed at 8:00pm, we began shutting down the precinct and began the process to close the ballot box. This involved connecting a modem to the machine to transmit the results to the city and the county. The machine appeared to connect and transmit the results successfully to the Wayne County clerk’s office; however, it repeatedly failed to transmit the results to the City of Detroit. We eventually gave up, reasoning that the tabulator tapes would be delivered to the Receiving Board anyway.

71. Because I was working at the ballot box, I could not see how many voters throughout the day had been listed as having already been issued absentee ballots. As we closed the poll, I saw what appeared to be about 12 orange slips of paper that were affidavits that the

voters did not have absentee ballots to surrender to the polling place. 199 people voted, and at least 5% of those people had also received an absentee ballot. However, we received zero returned absentee ballots.

72. Having worked in several elections in many counties in Michigan, it is my opinion that certified fraud examiners are needed to audit this election, including but not limited to the following anomalies:

- a. Poll workers were trained to strictly enforce social distancing rules upon challengers, contrary to a legal settlement, knowing challengers will not be able to view the processing and duplication of ballots.
- b. Poll workers were advised to deceive voters who may have been subject to errors or stolen ballots by issuing fake ballots that would be destroyed by the Department of Elections.
- c. The poll worker hiring process made it extremely difficult for the general public to apply, and the high propensity of teenagers employed as electronic pollbook inspectors and only electronic pollbook inspectors strongly suggests that poll workers were recruited in an unknown but clearly specific and possibly targeted manner.
- d. Ballot privacy was completely disregarded throughout the precinct on Election Day.
- e. Prohibitions on electioneering within 100 feet of and inside polling places were completely ignored.
- f. Absentee ballots previously issued were not reclaimed.

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- g. Workers were trained to add voters to the rolls and issue regular ballots to those that present an unverifiable paper receipt with no security devices.
- h. Workers were trained to resist the challenging of ballots and even challenged ballots were to be tabulated at the polls, and therefore could not be removed from the total except in the event of a recount.

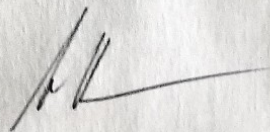


Adam de Angeli

On this 21<sup>st</sup> day of November, 2020, before me personally appeared Adam de Angeli, who in my presence did execute the foregoing affidavit, and who, being duly sworn, deposes and states that he has read the foregoing affidavit by him subscribed and knows the contents thereof, and that the same is true of his own knowledge and belief, except as to those matters he states to be on information and belief, and as to those matters he believes them to be true.

Name of Notary Public: Shane Trejo  
Oakland County, Michigan  
My Commission Expires: 11-20-22

SHANE TREJO  
Notary Public, State of Michigan  
County Of Oakland  
My Commission Expires 11-20-2022  
Acting in the County of oakland



Eugene

Dixon

### AFFIDAVIT OF EUGENE G. DIXON

The Affiant, Eugene G. Dixon, being first duly sworn, hereby deposes and states as follows:

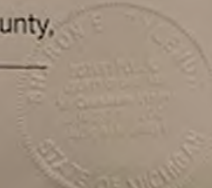
1. My name is Eugene G. Dixon. I am an adult citizen and resident of the State of Michigan.
2. I was trained and served to be an election challenger for the November 3, 2020 General Election and was credentialed by two organizations.
3. On Monday, November 2, 2020 I reported to TCF Center-Detroit to observe the preparation of mail-in and absentee ballots for tabulation. During this day the ballots were removed from their outer envelopes and voter names were marked in the electronic poll book. I asked why voter signatures on the envelopes were not verified at the tables. I was told that signature verifications were done earlier by the Detroit Department of Elections. Near the end of the day, ballots in their privacy sleeves, were placed in metal boxes, the boxes sealed, and stored at TCF Center over night to be guarded by Detroit Police officers.
4. On Tuesday, November 3, I again reported to TCF Center in the morning. I worked from 9 AM to 4 PM. During that time I observed that the procedure for tabulating ballots included carrying stacks of 200 ballots to the tabulator area, to be fed 50 at a time. Counted ballots would then go into metal bins near the tabulators. At one point I noticed an election worker carry the metal bin, containing tabulated ballots, back to where the ballots were being picked up at the table. This would have easily allowed removing tabulated ballots from the container, adding them to the pile of yet to be tabulated ballots. When I complained to a supervisor - this practice stopped.
5. The Detroit Department of Elections did not make sure that a republican was included in the five-member teams at the absent voter counting boards.
6. The Detroit Department of Elections did not make sure that a republican was present when duplicate ballots were made, to replace damaged ballots.
7. Approximately 11 PM, I returned to TCF Center and noticed there was a driveway with an open garage door in the basement tabulation area. I thought it was odd that several cars would drive in to the area, park there for a few minutes and then leave without anyone getting out of the car, as I observed.

8. At approximately 1:30 to 2:00 AM, November 4, 2020, I observed a group of approximately 100 young people, most carrying backpacks and cell phones, enter through the front doors of the TCF Center and come directly in to the area where votes were tabulated and processed. Some members from the "group" were wearing yellow, "protect the vote" sweatshirts and others were wearing all black. During this time there was no security, and no check-in for credentialing for anyone. On November 2nd and 3rd, only election workers and credentialed election challengers could enter the counting area.
9. This large group of young people were a distraction and disruptive to me and some in the group seemed to harass and intimidate election challengers. I wondered why these young people were there. They were not election workers, and they did not appear to be nor act as credentialed challengers. What was their intent? - I do not know.
10. At approximately 3:00 AM, November 4, 2020, a Detroit Department of Elections van arrived at the basement doorway adjacent to the counting area. They delivered 39 boxes of ballots, which were placed on tables in the middle of the counting room. There were already approximately 20 boxes of ballots on those tables waiting for processing and tabulation. When the 39 boxes arrived, election officials, standing in a raised area in the middle of the room, advised and announced that these 39 boxes were the last remaining mail-in/ absentee ballots for processing and tabulation. At that time it appeared to me that approximately 75 percent of the tables were idle having no ballots to process or tabulate. It appeared that once the total approximate 59 boxes were tabulated, all mail-in/absentee ballots would then be processed/tabulated and the work at TCF concluded.
11. I left the TCF Center at approximately 4:00 AM, November 4, 2020.

*Eugene G. Dixon* 11/22/2020 **EUGENE G. DIXON**

On this 22nd day of November, 2020, before me appeared Eugene G. Dixon, who in my presence did execute the foregoing affidavit, and who, being duly sworn, deposes and states that he has read the foregoing affidavit by him and knows the contents thereof, and the the same ins true of his own knowledge and belief except as to those matters he states to be on information and belief, and as to those matters he believes them to be true.

*Alvin E. Joffe* Notary Public, Oakland County, Michigan. My Commission Expires: August 16, 2023



George

Henderson

Braden

Gaicobazzi



## AFFIDAVIT OF BRADEN GAICOBAZZI

Braden Gaicobazzi being sworn, declares under penalty of perjury:

I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.

1. I am a registered voter in the State of Michigan.

2. I had the following experiences at TCF (COBO) Hall on 11/4/2020

3. I experienced: Intimidation countless times, persistent lies from some table supervisors and managers regarding rules that prohibited me from doing my job, and threats of assault. I was escorted from the room by police after about 9 or 10 hours of peacefully doing my job for simply standing my ground at a table with people who were denying me access to see ballots and threatening me. I did not resist police in any way and left peacefully.

4. I saw an online note from someone within my GOP network of friends that 35,000 ballots had been received in the middle of the night and that they needed poll watchers on November 4th. I arrived in the late morning to be trained.

5. The first thing I noticed was that at least one person outside the ballot room entrance had a BLM mask on. She appeared to be doing temperature checks. Once inside, it was apparent that many and probably most tables in the room were hostile towards people with GOP lanyards.

6. I initially worked with an honest table, but after a few hours, I moved to another table because we were low on GOP Challengers. This is because they kept kicking out GOP challengers, using the police in the room to physically remove them. In fact, early in the afternoon or later morning, someone came into the room, made an announcement, and several people appeared to be

removed from the room as the doors were locked and the windows were boarded up with cardboard. I was informed that no GOP people were allowed in and that, if we left, we could not get back in. I asked several of the 'independent' lawyers and law students who were acting as challengers and none of them seemed to believe this to be an issue.

7. I talked with several of these 'independent' lawyers/law students at length in casual, friendly conversation and, based upon their answers to basic questions about the news, it was evident that EVERY single one of the lawyers/law students that I talked to was ideologically far-left, supporting things like CHAZ/CHOP in Seattle and condoning the crime skyrocketing around the country or wanting to work in Brooklyn because they support 'progressive' changes to law to 'not prosecute rioters,' etc. Yet, they all claimed to be independent. Anyway, every time a GOP staffer was removed from the room, most of the entire room would erupt in cheers and laughter and oftentimes derogatory insults as GOP Challengers were walked out by police.

8. Throughout the day, I was on numerous occasions told that I was not allowed within 6 feet of the tables. I told them I had to step in for a moment for each ballot to ensure that numbers or names matched and assured them that it would be brief and that the lawyers said this was by lawful, but table supervisors and their broader supervisors would often step in the way and prevent me from seeing ballots while claiming I was trying to kill or endanger their ballot counters with Covid. This was obviously incorrect and even when lawyers would tell the whole table this, they would often argue with the lawyer. After the lawyer would leave, sometimes the behavior would continue.

9. For much of the day I was with one good table. However, as the night drew long I was bouncing between several tables, mostly near the back of the room, because there were not enough GOP challengers remaining in the room and many tables had no challengers watching them at all. At around 8pm at one of the tables in the second-to-last row near the right corner, a specifically egregious moment occurred.

10. The table was counting a stack of about 35 ballots that all appeared to have pink challenge stickers on them. None of these ballots appeared to be in the digital database of voters, so the people at the table were simply entering names and addresses into the computer with birthdates of 1/1/1900. I personally was able to observe the 1/1/1900 birthdates on the computer. There were also addresses and names which I could not verify because I wasn't allowed close enough to the table for long enough to compare anything. I told the table I was challenging every one of these ballots. They laughed and said I can't just do that. I then noticed that at least one of the ballots and envelopes was mismatched based on the numbers. I waited to see if the table checker (at I believe station 2) would catch this and he did not, so I spoke up requested that the ballot be reviewed/challenged. I could not see any political affiliation information on the ballot, including voting; just the numbers on the envelope and ballot.

11. At some point, another GOP volunteer went to grab a lawyer for me because a debate ensued over this. There weren't nearly enough lawyers in the room to act on our behalf. When I would try to verify the names on the envelope or check the ballot number against the envelope number to ensure everything was okay, I was given the Covid runaround and separated from the table. (I cannot tell you by whom because, throughout the day, I recall very few people at these tables were ever willing to give me their name and party affiliation or even their job title. Everyone else stonewalled and said I wasn't allowed to talk with anyone at the table and that no one at those tables was required to tell me anything, often including the table supervisors and their managers.

12. The table supervisor came over and began giving me the same speech and, while I was politely telling him I was just doing my job, another GOP staffer went to find a lawyer for me. In this time, the table swarmed with, I assume, Democrat operatives getting very close to me and then yelling at me to back off 6 feet from him for Covid and complaining about the way I was wearing my mask moving because I was being forced to talk to him so much. The

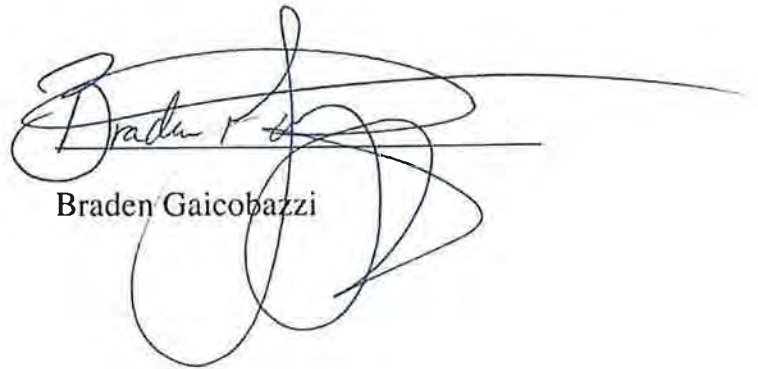
supervisors and table had no problem with these people being close to the table and seemed to be familiar with one another, as though they were all on the same team. The antagonistic staffers invented any kind of reason to prevent me from doing my job and get me agitated. Finally, a lawyer showed up who told them I was allowed to do my job; like other tables, they simply argued with him as well. Having missed several ballots due to the arguing, I stepped in for a moment to verify the next ballot number matched its envelope.

13.The table supervisor, his supervisor and several other operatives (none of them would give their names or credentials) swarmed in and began intimidating me. I was separated from the table at one point by the table supervisor's supervisor and told to stand back. He stepped closer and closer to me as I backed further away to the other side of the table. I asked him what his name and job title was and he, along with the rest of the intimidators, refused to give me any information. He made some kind of innuendo about 'playing with' him that made me uncomfortable and he then told me something to the effect that he would either 'kick my ass or kick me out'.

14.In disbelief, I asked him if he was truly threatening me because I was just doing my job. He repeated his mantras multiple times and called the cops over and had me forcibly removed. The police questioned nothing and I didn't fight them at all and left peacefully. However, I had to grab my coat and gave my unfinished notes to another GOP volunteer, Andrew, so I do not have them as I write this affidavit and don't recall if I was able to write down the table number of this final event of my evening. Once escorted out of the building, I held the door for a brief moment to ask the police how to get to my car because I had no idea where I was in relationship to the parking deck, and they said they had no idea.

15. As a final note, I did find it odd that, throughout the day/night, I saw a few dozen military ballots be counted. Although I cannot provide specific numbers or names, I can estimate that at least 80% of the military ballots I saw were straight ticket democrat or simply had Joe Biden's name filled in on them. I had always been told that military personnel tended to be more conservative, so this stuck out to me as the day went on.

Dated: November 8, 2020



Braden Gaicobazzi

Subscribed and sworn to before me on:

/s/ 28 November, 2020

Notary public, State of Michigan, County of: Wayne

My commission expires: 06-14-2022



Florence Portenzio Giunno

Janice

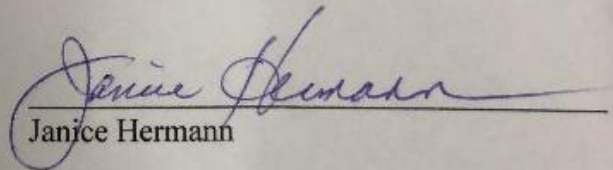
Hermaan

**AFFIDAVIT OF JANICE HERMANN**

The Affiant, Janice Hermann, being first duly sworn, hereby deposes and states as follows:

1. My name is Janice Hermann. I am an adult citizen and resident of the State of Michigan.
2. I served and was trained to be a Republican challenger for the November 2020 election in Detroit, Michigan at TCF Hall.
3. On November 4, 2020 upon arriving at TCF Hall, I noticed that the hall was very large with hundreds of tables, but there were only a small number of Republicans challenger assigned to tables.
4. Specifically, Republicans were not assigned to tables where election workers were duplicating ballots. This process entails taking the original ballot and copying the votes by hand on a new ballot so the ballot can be run through the tabulator.
5. The election supervisors and workers would not let Republican Challengers watch this process or get close enough to see the process.
6. This was highly disturbing because the vote can simply be changed by hand and then run through the tabulator. My understanding is that state law requires members of both parties to witness the duplication process to ensure its integrity.
7. This did not occur.

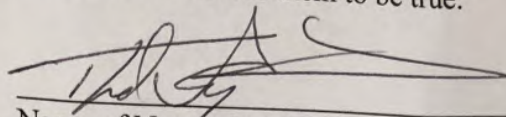
8. I tried to observe the duplication process. My polite efforts were often met with hostility. The workers would present their backs between me and the process going on, creating a "wall."
9. I saw a ballot removed from the spoiled ballot box. As the election worker was duplicating the ballot, I asked to see it to make sure it was being duplicated properly. I was shown the ballot from a far distance away, too far for me to read it. Then, the ballot was quickly disposed of. As a challenger, it was literally my job that day to watch election processes such as this, but I was repeatedly disallowed from doing so and saw alarming acts of intimidation.
10. At one point, I saw a woman wield a letter opener as a weapon to make sure the observer was not close enough to see what she was doing as she duplicated ballots. This was also witnessed by my friend who was accompanying me, along with other observers.
11. At no time did I ever see an election worker or supervisor authenticate signatures to process any ballots.
12. I saw election workers attributing names and birthdates to ballots that did not appear in the computer system.
13. I saw the election workers repeatedly set aside ballots that did not appear on the voter list, and I was given no indication of where they were taken and why.
14. I also saw election workers attribute ballots to very early birth years. Once I caught on that this was occurring habitually, I noted one voter who was supposed to have been born on May 29, 1921, began voting on January 31, 1900, and registered to vote in Michigan in 2010.
15. I also noticed a very large number of voter registrations had taken place in September and October, 2020.
16. When the election workers processed all of the military ballots, I tried to observe the duplication process of these ballots as there were no Republican challengers allowed to observe the process up close. Again, I was denied the ability to witness any duplications of military ballots.
17. I was locked out and denied access to TCF Hall without warning.
18. Further affiant says not.

  
Janice Hermann



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On this 12 th day of November, 2020, before me personally appeared Janice Hermann, who in my presence did execute the foregoing affidavit, and who, being duly sworn, deposes and states that she has read the foregoing affidavit by her subscribed and knows the contents thereof, and that the same is true of her own knowledge and belief, except as to those matters she states to be on information and belief, and as to those matters she believes them to be true.

  
\_\_\_\_\_  
Name of Notary Public:

Oakland County, Michigan

My Commission Expires: 7/31/2026

**Thad Sylvester**  
NOTARY PUBLIC, OAKLAND COUNTY, MI  
My Commission Expires 07/31/2026  
Acting in the County of Oakland



Abby

Hilminen

Abbie Helminen, being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.

2. I am a registered voter in the State of Michigan

3. On Wednesday November 4<sup>th</sup> 2020 from 10am to 330pm I was at the TCF center in Detroit, MI. When I arrived, we were not denied access, signed in at a table and indicated that I was a republican. Upon returning from lunch, most people were being denied, but I was allowed back in because they recognized myself & two friends.

4. ~~At the table~~ I witnessed at table 88 <sup>were</sup> ~~was~~ many indications of duplicate ballots on the computer screen. The ballots were then passed to the next person at the table. When I questioned this many times, I was told they have their own process and dont interrupt it. I then ~~proce~~ proceeded to write down the number of the ballot. Each time the

4 continued.

Computer indicated this, the worker would quickly scan the next ballot. Several times I would try to move a little closer to the computer to read better I was shooed & even <sup>physically</sup> pushed <sup>by a poll worker</sup> once. The democrat standing there was also telling me the ballots had matched. During these same instances I had a democrat over my shoulder and intimidating wherever I went.

5. ~~On 11/11/20~~ I noticed while also watching this table 88 was the passing of ballots that didn't come up on the computer. They were passed to another worker at the table who was checking the pile of papers for the name. The worker would separate into ~~two~~ 3 different piles. ~~Since they were~~ since they were separated, the names didn't match the list. When I asked to verify and why there were separate piles, the woman screamed at me to "Get away and don't worry, we have a different process than other tables." ~~On 11/11/20~~ I then asked the woman in the black shirt (officiator)

2 of 6

told me I wasn't allowed to challenge the process. I simply told her I wanted to observe where they were being passed and she again told me to step away from the table. Not one of these ballots were put in the spoiled ballots box. ~~Table 88~~ had a different order of passing ballots and opening them than ~~the other tables.~~

~~Table 88~~ The ballots were then picked up and carried around the table to be taken out of the envelopes. ~~Table 88~~

6. I thought signatures were supposed to be matched from the ballot to the applications, however I never saw any applications at any station.

7. There were a lot of coolers & suitcases throughout the room. A few times I tried to take pictures I was threatened to be kicked out. I have pictures that I emailed to [mieda@donaldtrump.com](mailto:mieda@donaldtrump.com).

8. When I was moving from a couple tables to another area, I noticed several

3 of 6

tables that were empty with ballots sitting there. ~~At~~<sup>At</sup> other times, all the ~~Poll~~<sup>Poll</sup> workers at the tables were on their phones. ~~It~~ It seemed odd since we were getting yelled at all the time for phones.

9. Around 2pm, ~~the~~ the room began to get very intimidating. There was a large police presence that moved into the room. At this point, people began to put cardboard on the windows to prevent others from ~~seeing~~ seeing in. It felt closed in and the room also began to get loud. All the sudden, there was a loud roar from a table where a man was using his phone. I did not witness him taking a picture but he was hauled away by police with no trouble. The alarming thing was that the whole room erupted in claps & cheers. This included ~~the~~ the poll workers.

10. There was a break from the time most tables were done and the time the military ballots arrived. It seemed quite chaotic at this point and people

were everywhere. People walked into the room from the back doors with mail trays full of ballots. People were pulling ballots from the bins and just carried here & there.

11. I observed suitcases & boxes saran wrapped in the rear of the room. It was not indicated ~~what~~ what they were, but there was a couple times that I was asked to get away from them.

12. At the point that boxes were over the windows, no one was being allowed in. Democrats outnumbered republicans by ~~about~~ <sup>at least</sup> 2:1. We were all trying to stay and cover many tables because we didn't have enough watchers.

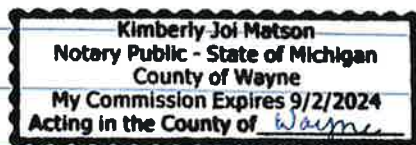
13. At 3:45, myself & a friend tried to leave at the doors we came in from. The police were lined up and said to go out the side doors. It was very intimidating & uneasy. No one was

5 of 6

at that door, so there was no place to check out.

14. From the time they stopped allowing people in the room, the amount of occupants was a lot less than there were earlier in the day. It did not seem like capacity was ~~reached~~ at ~~any~~ any more, to reach a room capacity.

Abbie Helminen  
Abbie Helminen  
11/8/2020



Sworn before me on:  
11/8/2020

Kimberly J Matson  
Acting in the state  
of Michigan, County  
of Wayne. Commission  
expires 9/2/2024



Jasom

Humes

**AFFIDAVIT**

I, Jason R Humes (Affiant), personally appear before the undersigned notary public, and under oath or affirmation make the following statements:

My name is Jason R Humes. I am an adult citizen and resident of the State of Michigan. I volunteered to be a MI-GOP poll challenger and was trained for the November 3, 2020 election. The multiple trainings included specific training for the Detroit Absentee Ballot Counting Boards taking place at TCF Center. During my observations on November 3, 2020, which started at 7 am and ended at 8 pm, I was assigned to lead the MI-GOP team at the absentee ballot adjudication review screens (approximately 12 screens / stations in total) located in the middle of the room alongside the raised platform.

I personally observed 1-2 screens from approximately 8:30 am to 7:30 pm, except for a break when the election workers took a break. Each adjudication screen had two election workers who reviewed the computer-generated overlay which included a green highlight with a large check mark if readable and a yellow highlight with no check mark if unreadable. Election workers and challengers were unable to see original voter marking of ballot unless the election workers removed the overlay. The majority of the time election workers quickly decided each ballot and did not remove the overlay to review all the markings on the ballot to see the entire intent of the voter. Each election worker adjudication team was asked by MI-GOP Poll Challengers if the team was balanced, with one declared republican and one declared democrat. Out of the approximate 12 election worker teams, only 2-3 were balanced during the day. At approximately 10 am one of the adjudication screens I was observing had an error message pop up on the screen. Within a few minutes, upon my observation, all the screens had error messages and the terminals at the raised platform were also impacted. The election IT employees were scrambling for at least 30 minutes to restore the computer system. No explanation was provided on what caused the computer issue.

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Jason R. Humes Date: 11/10/2020  
Signature of Affiant

State of Michigan

County of Oakland

Signed and sworn to (or affirmed) before me on 11/10/2020  
Date

by Jason R Humes  
Printed name(s) of individual(s) making statement

who proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Personally Known  
or  
 Produced Identification

Type of ID \_\_\_\_\_

Karel J Van Akin  
Signature of notary public

(Name of notary, typed, stamped or printed)  
Notary Public State of Michigan

Stamp/Seal

My commission expires: \_\_\_\_\_



Jessy

Jacob

**STATE OF MICHIGAN**  
**IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE**

---

**CHERYL A. COSTANTINO and EDWARD P.  
McCALL, JR.,**

**Plaintiff,**

**-vs-**

**AFFIDAVIT OF JESSY JACOB**

**FILE NO: 20-\_\_\_\_\_ -AW**

**JUDGE**

**CITY OF DETROIT; DETROIT ELECTION  
COMMISSION; JANICE M. WINFREY, in  
her official capacity as the CLERK OF THE  
CITY OF DETROIT and the Chairperson of  
the DETROIT ELECTION COMMISSION;  
CATHY M. GARRETT, in her official  
capacity as the CLERK OF WAYNE  
COUNTY; and the WAYNE COUNTY  
BOARD OF CANVASSERS,**

**Defendants.**

---

**David A. Kallman (P34200)**  
**Erin E. Mersino (P70886)**  
**Jack C. Jordan (P46551)**  
**Stephen P. Kallman (P75622)**

**GREAT LAKES JUSTICE CENTER**  
**Attorneys for Plaintiff**  
**5600 W. Mount Hope Hwy.**  
**Lansing, MI 48917**  
**(517) 322-3207/Fax: (517) 322-3208**

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**AFFIDAVIT**

The Affiant, Jessy Jacob, being first duly sworn, hereby deposes and states as follows:

1. My name is Jessy Jacob. I am an adult citizen and resident of the State of Michigan.
2. I have been an employee for the City of Detroit for decades.
3. I was assigned to work in the Elections Department for the 2020 election.
4. I received training from the City of Detroit and the State of Michigan regarding the election process.


5. I worked at the election headquarters for most of September and I started working at a satellite location for most of October, 2020.
6. I processed absentee ballot packages to be sent to voters while I worked at the election headquarters in September 2020 along with 70-80 other poll workers. I was instructed by my supervisor to adjust the mailing date of these absentee ballot packages to be dated earlier than they were actually sent. The supervisor was making announcements for all workers to engage in this practice.
7. At the satellite location, I processed voter registrations and issued absentee ballots for people to vote in person at the location.
8. I directly observed, on a daily basis, City of Detroit election workers and employees coaching and trying to coach voters to vote for Joe Biden and the Democrat party. I witnessed these workers and employees encouraging voters to do a straight Democrat ballot. I witnessed these election workers and employees going over to the voting booths with voters in order to watch them vote and coach them for whom to vote.
9. During the last two weeks while working at this satellite location, I was specifically instructed by my supervisor not to ask for a driver's license or any photo I.D. when a person was trying to vote.
10. I observed a large number of people who came to the satellite location to vote in-person, but they had already applied for an absentee ballot. These people were allowed to vote in-person and were not required to return the mailed absentee ballot or sign an affidavit that the voter lost the mailed absentee ballot.
11. Whenever I processed an absentee voter application or in-person registration, I was instructed to input the person's name, address, and date of birth into the Qualified Voter File (QVF) system.
12. The QVF system can be accessed and edited by any election processor with proper credentials in the State of Michigan at any time and from any location with internet access.
13. I worked at the satellite location until the polls closed on November 3, 2020 at 8:00 p.m. and properly completed the entry of all absentee ballots into the QVF by 8:30 p.m.

GREAT LAKES JUSTICE CENTER

- 14. I then reported to work at the TCF Center on November 4, 2020, at 8:30 a.m. to process ballots. I was instructed not to validate any ballots and not to look for any deficiencies in the ballots.
- 15. Absentee ballots that were received in the mail would have the voter's signature on the envelope. While I was at the TCF Center, I was instructed not to look at any of the signatures on the absentee ballots, and I was instructed not to compare the signature on the absentee ballot with the signature on file.
- 16. All absentee ballots that existed were required to be inputted into the QVF system by 9:00 p.m. on November 3, 2020. This was required to be done in order to have a final list of absentee voters who returned their ballots prior to 8:00 p.m. on November 3, 2020. In order to have enough time to process the absentee ballots, all satellites were instructed to collect the absentee ballots from the drop-box once every hour on November 3, 2020.
- 17. On November 4, 2020, I was instructed to improperly pre-date the absentee ballots receive date that were not in the QVF as if they had been received on or before November 3, 2020. I was told to alter the information in the QVF to falsely show that the absentee ballots had been received in time to be valid. I estimate that this was done to thousands of ballots.
- 18. The above information is true to the best of my information, knowledge, and belief.
- 19. Further affiant says not.

  
 \_\_\_\_\_  
 Jessy Jacob

On this 7th day of November, 2020, before me personally appeared Jessy Jacob, who in my presence did execute the foregoing affidavit, and who, being duly sworn, deposes and states that she has read the foregoing affidavit by her subscribed and knows the contents thereof, and that the same is true of her own knowledge and belief, except as to those matters she states to be on information and belief, and as to those matters she believes them to be true.

  
 \_\_\_\_\_  
 Stephen P. Kallman  
 Notary Public, Eaton County, Michigan  
 My Commission Expires: 11/26/2025

Kristina

Karamo



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INCIDENT REPORT			
TIME:	Type of ballot: <input checked="" type="checkbox"/> Absentee <input type="checkbox"/> Early Voting <input type="checkbox"/> Election Day <input type="checkbox"/> Provisional		
NAME	Kristina Karamo		
FULL ADDRESS	13430 Rosemary Blvd. Oak Park, MI 48237		
PHONE	248-798-2943	E-MAIL	Kristina.Karamo@gmail.com
LOCATION			
STATE	Michigan	COUNTY	Wayne
MUNICIPALITY	Detroit	POLLING LOCATION	TCF Center Absentee Counting
DESCRIPTION OF INCIDENT (Use back to continue if necessary)			
<p>① On 11/3/2020 I asked for the tabulation numbers for each counting machine between 9pm-10pm. I wanted ensure that when the new shift started, they were starting at the right point, so we would know that the count is balanced. I was given the run around regarding who I should talk to. Only to be denied this information.</p> <p>② Very early on 11/4/2020 I was standing at the adjudication table. A ballot came on the screen, the voter voted straight party Republican and straight party Democrat. One of the women at the table whose job it is to inspect the ballot, decided to give it to the Democrats. The voter made no other votes on the ballot. Only two filled in circles for straight party for each the Republican &amp; Democratic party. <span style="border: 1px solid black; padding: 2px;">Continue on Back</span></p>			
WHAT REMEDY OR RESPONSE, IF ANY, WAS TAKEN WITH RESPECT TO THE INCIDENT?			
<p>For incident number #2, I reported what happened to attorney onsite for the GOP named Brian. He also wrote on the report which was turned in to the G.O.P staff that was there about 7am on 11/04/2020.</p> <p style="text-align: right;">more on back</p>			
Category of Incident (check all that apply)			
<input checked="" type="checkbox"/> Illegal Voting <input type="checkbox"/> Intimidation <input type="checkbox"/> Electioneering <input type="checkbox"/> Ballots <input type="checkbox"/> Machines <input checked="" type="checkbox"/> Election Workers <input type="checkbox"/> Provisional Ballots <input type="checkbox"/> Poll Opening <input type="checkbox"/> Poll Closing <input type="checkbox"/> Violence <input checked="" type="checkbox"/> Challenge <input type="checkbox"/> Other			
Is the Issue Resolved? <input type="checkbox"/> YES <input type="checkbox"/> NO		Call taken by:	

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10f3

Continued....

Per election law the ballot should have been tossed out. However the worker insisted because the circle for Democrats, they should get the vote. That is illegal because each mark was a filled in circle which is an intentional mark. So I went to get her supervisor, who then asked the worker what they thought. The law is clear on what they are to do. So I got the supervisor's supervisor and he did the same thing. This supervisor was overseeing the entire 10pm-5am shift. He asked the worker what she thought. So I asked the worker why not give it to the Republicans. He then began to scream at me, telling me not to talk with her. Then he instructed her to "push it through", when the ballot legally should have been rejected. I said I'm challenging the ballot. He continued to yell at me that I could do what I want to do. But he continued to tell the worker to push it through. I insisted that they wait for me to challenge it, and to get the GOP attorney the head supervisor refused and told the worker to count the ballot.

- ③. I also witnessed ballots being delivered between 3:00am-3:30am 11/4/2020
- ④. I witnessed workers using their body to shield challenges from seeing the duplication process
- ⑤ conservatives were severely outnumbered, so more people showed up to help us the weren't allowed in and the doors were chained shut which is a safety hazard in case of fire or other emergency.
- ⑥ I witnessed addresses and names being keyed in that were not in the pollbook which were given the birthday 01/01/1900. which is false. Also this voter isn't on the voter roles.

2 of 3

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Kristina E. Karamo  
signature

11/10/2020  
Date

Marian E Sheridan  
NOTARY PUBLIC - STATE OF MICHIGAN  
COUNTY OF OAKLAND  
December 12, 2022  
Acting in the County of Oakland

Marian Sheridan

Brett

Kinney

State of Michigan  
Affidavit

I, Brett Kinney am a Michigan registered voter at 15845 Knurlwoode Romulus, MI 48174

I have been serving on Nov. 3, 2020 as a poll challenger for the Trump for President campaign committee and Michigan Republican Party at the TCF center in Detroit canvass

At approximately 1:20 pm I observed a ballot being duplicated at AVCB 37 and I approached Elections supervisor I asked him "Is there a Republican supervisor present to witness this ballot duplication. He said "It's not required and he does not have to look for one. The supervisor continued to duplicate the ballot I was challenging

I have witnessed this at approximately 1:20 on Nov. 3 2020  
Signed by Brett Kinney 11-3-2020

Susan L. Mills

Susan L. Mills, Notary Public

Cristy

Klamer

### AFFIDAVIT OF KRISTY KLAMER

Kristy Klammer, being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. I am a registered voter in the State of Michigan.
3. I was at the TCF Center in Detroit Michigan from 7:00am to 10:00pm on Tuesday, November 3, 2020 and from 8:30am on Wednesday November 4, 2020 to 4:30am Thursday on November 5, 2020.
4. I along with many others were intimidated, harassed, verbally attacked, or met with resistance consistently on November 4, 2020 from Democrat challengers, independents, a lawyer, team leaders, and supervisors. I experienced a lawyer, 2 team leaders, and 3 others come as a group to come intimidate me after challenging a ballot in which I was met with much resistance. It never got put in the computer. I was told by a Democrat lawyer that I couldn't keep challenging the ballots and was told I might get escorted out. I was told by the same Democrat lawyer that I could not challenge every ballot. I asked the lawyer nicely, as she began aggressively accusing me & trying to bait me, if she was trying to intimidate me. She said "don't put words in my mouth. You're a liar." I walked away. I witnessed two other people experiencing a similar situation both times I stepped in to try to deescalate the situation. I was repeatedly lied to by different people and told things like I shouldn't be watching the ballots being duplicated and should "just let them do their job."
5. The events described above impaired my ability to properly observe and challenge.

6. At one point I had about 8-10 Democrat challengers all near me. I had two big guys come stand close to me and say "I think we're going to stand right here." My friend was silently raising her hand to challenge a ballot and no one was coming. A crowd drew and a man started attacking her verbally. I began to see a pattern of intimidation against Republican challengers. I also noticed a tactic of fake befriending & trying to ask lots of questions to Republican challengers to either gather info or distract you while trying to observe.
7. I walked around the whole room many times. At one point I walked around the whole room and saw about 3 confrontations.
8. Around early afternoon tensions began to rise there seemed to be a literal shift in the room. I noticed the team leaders, after one of their many meetings (I couldn't figure out why they met so often & it was frustrating because they were unavailable to us for a while during that time), began to become more aggressive. There seemed to be a distinct difference. There was a specific team leader that was helping to eject Republican challengers and really enjoyed making it a big scene as the police would escort out. He would walk with them and one time said "you wanted to go outside is that what you want." He was trying to get everyone riled up and he seemed to love the applause that would break out every time one of our attorneys or other Republicans were escorted out. I never saw a Democrat escorted out.
9. I witnessed an Asian Republican man being teamed up against (4-5 people). This man was being told he wasn't allowed to watch a ballot being duplicated.



10. I had a democrat challenger ask me where I lived. After sharing with her she said "Why did you come here?" I told her that they needed more Republicans here. She said "I'm sure there is fraud everywhere I think I'll go to your town next time."
11. I stayed along with 10-12 other people until 4:30am on Thursday 11/5 morning to make sure all the ballots were properly secured. They let the election workers go around 11:30. There was a big line of election workers that formed to sign something. Two women heard them offer \$300 for the election workers to stay. The election workers then had some meetings with the supervisors & team leaders meanwhile the tables were left with the ballots not being secured in anyway. We did our best to be at as many tables as we could for the securing process.
12. After checking all of the tables we found about 8 or so that were "locked," but they were not latched so you could just open them. They were not secure. I wrote down the numbers and as a team we made sure they were properly latched/locked. There were multiple tables where the ballots seemed to not add up. So much so that election workers at one table took everything out and were recounting it.
13. I observed 46 ballots processed that were not in the computer system. For these ballots election workers manually entered information including birthdates of "1/1/1900." These ballots were the following:  
**Precinct# 57** Theresa Mccants #3647, Danielle Murphy #3224, Latoya Flowers #3641, Lawanda Williams #6051, Antoine Stubbs #4207, Dajuan Sample #2278, Sabrina Nellems #3162, Leroy Simmons #3165, Shanese Scott #0721, Clanecia Sailor #4327, Yevette Polk #5318, Brian Reed #4326, Deborah Witcher #2280, Lakirra Thompson #4323, Dundre Thomas Jr. #1122, Kathleen Smiley #0757,

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Anthony Norris #4324, Paulette Pace #3591, Tranel Patterson #1368, Crystal Martin- Patterson #1237, Rasheed Jabbaar #3163, Nushamm Jabrell #4328, Antoine Garrison #3167, Jerisha Frazier #1302, Robert Loury #4206, Jarmane Keys Jr #4325, Matthew Jordeen #4276, Christopher Kent #1383, Condrea Mashatt #5322, Michael Moore Jr. #2300, Traci Armond #2096, Ariana Driscoll #1366, Gerald Bryant #0958, Diana Morrison #1121, Angel-Renee Taylor #1358, Derrick Mason #1176, Katia Butler #3161,

**Precinct #74** Eric Gaskin #2689, Lavonia Perryman #1488, Francisco Williams #1489, Hector Collazo #2183, Andrew Radke #1822, Brennan Jessie #2182, Hannah Gates #0260.

**Precinct #68** Mary Perkins-Randle #4251

**Precinct #66** Jasmine Anderson #5452

November 23  
Dated: ~~November 9~~, 2020

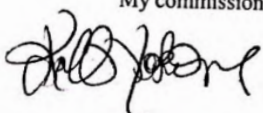
Kristy Ann Klamer  
[Print name] Kristy Ann Klamer

Subscribed and sworn to before me on:

/s/ November 23, 2020

Notary public, State of Michigan, County of: Wayne

My commission expires: 6/28/2023



KATHI YOKOM  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF WAYNE  
MY COMMISSION EXPIRES Jun 28, 2023  
ACTING IN COUNTY OF Oakland



Stephanie

Krause


**AFFIDAVIT OF STEPHANIE KRAUSE**

Stephanie Krause, being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. I am a registered voter in the State of Michigan.
3. I was a Republican Poll Challenger on November 4, 2020 at TCF Center in Detroit Michigan.
4. I experienced intimidation the entire time from 8:30 am to 12:00pm., that I was on the floor attempting to observe.
5. Any time I would approach a table to observe, Democratic poll challengers would block the viewing; the Democratic challengers would try to distract us from observing the information on the monitor.
6. I did attempt to speak with other Republican poll challengers to discuss how to effectively observe, but we were told we could not converse amongst ourselves.
7. If masks of Republican poll challengers slipped off their noses, they were escorted from the premises, but if a Democratic poll challenger's mask slipped, they were allowed to stay.
8. As I was speaking with another Republican poll challenger, a woman suddenly appeared and claimed the other Republican poll challenger was "harrassing" her. He was not, he was speaking to me. The police however came and escorted him away.

9. I left for lunch and was denied re-entry. I was never permitted re-entry. Democratic poll watchers were permitted re-entry, but Republican poll challengers were told the building was "at capacity".
10. After I was denied re-entry, I stayed in the lobby in case we could relieve other Republican poll challengers.
11. No new Republican poll challengers were permitted to enter, but Democratic poll challengers were permitted to enter, as well as ACLU and press.
12. Around 2:30 or 2:40 in the afternoon, the poll workers took used pizza boxes and taped them to the windows so no one could see what was occurring on the floor.
13. I was effectively prevented to poll watch or challenge. It was literally impossible to observe or make challenges. When I inquired as to why my challenges were not accepted, I was told the rules "no longer applied".
14. I left the TCF Center at approximately 6:30pm on November 4, 2020

15. Dated: November 8, 2020

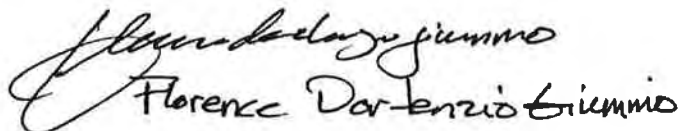
  
Stephanie Krause  
Stephanie Krause

Subscribed and sworn to before me on:

/s/ 08 November, 2020

Notary public, State of Michigan, County of:

My commission expires: 06-14-2022

  
Florence Dar-Enzio Giunno

David

Langer

**AFFIDAVIT OF DAVID LANGER**

DAVID LANGER being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. I am a registered voter in the State of Michigan.
3. AT TCF on Wednesday arrived at approx. 12:30 pm prohibited entry to the counting floor. Told to wait. Kept door closed. Waited until approx. 10:30 pm when returned home.


Dated: November 8, 2020



David Langer  
DAVID LANGER  
586 214-5507

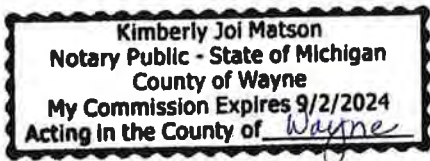
11/08/2020

Subscribed and sworn to before me on: 11/8/2020

1st   
Notary public, State of Michigan, County of: Wayne

My commission expires:

9/2/2024



Zachary

Larsen



**STATE OF MICHIGAN**  
**IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE**

---

**CHERYL A. COSTANTINO and EDWARD P.  
McCALL, JR.,**

**Plaintiff,**

**-vs-**

**CITY OF DETROIT; DETROIT ELECTION  
COMMISSION; JANICE M. WINFREY, in  
her official capacity as the CLERK OF THE  
CITY OF DETROIT and the Chairperson of  
the DETROIT ELECTION COMMISSION;  
CATHY M. GARRETT, in her official  
capacity as the CLERK OF WAYNE  
COUNTY; and the WAYNE COUNTY  
BOARD OF CANVASSERS,**

**Defendants.**

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**AFFIDAVIT OF ZACHARY  
LARSEN**

**FILE NO: 20-\_\_\_\_\_ -AW**

**JUDGE**

**David A. Kallman (P34200)**  
**Erin E. Mersino (P70886)**  
**Jack C. Jordan (P46551)**  
**Stephen P. Kallman (P75622)**  
**GREAT LAKES JUSTICE CENTER**  
**Attorneys for Plaintiff**  
**5600 W. Mount Hope Hwy.**  
**Lansing, MI 48917**  
**(517) 322-3207/Fax: (517) 322-3208**

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**AFFIDAVIT**

The Affiant, Zachary Larsen, being first duly sworn, hereby deposes and states as follows:

1. My name is Zachary Larsen, I am over the age of eighteen, have personal knowledge of the facts stated in this Affidavit and, if sworn as a witness, I am competent to testify to these facts.

2. I am an attorney in private practice and licensed in the State of Michigan. Prior to my entry into private practice, I served as an Assistant Attorney General for eight years from January 2012 through January 2020, where I was recognized with an award for the quality of my work and served the state on several high-priority litigation matters.

3. In September 2020, I volunteered to serve as a poll challenger for the Michigan Republic Party's election day operations to ensure the integrity of the vote and conformity of the election process to the election laws of Michigan.

4. In preparation for my service, I attended an elections training, reviewed materials relating to the conduct of elections, and read pertinent sections of Michigan's election law.

5. On Election Day, Tuesday, November 3, 2020, I served as a roving attorney and credentialed poll challenger with a group of attorneys and visited approximately 20-30 voting precincts in Lansing, East Lansing, and Williamston, Michigan to confirm that the election was conducted in accordance with law, and on a few occasions, to address complaints raised by specific voters.

6. During my visits to precincts on Election Day, I was allowed to visually inspect the poll book without touching it at every precinct where we asked to review it. In each instance, I was allowed to stand a respectful distance behind the election officials while remaining close enough to read relevant names and numbers.

7. The following day, on Wednesday, November 4, 2020, I arrived at the former Cobo Center, now known as the TCF Center, in Detroit, Michigan to serve as a poll challenger for the absent voter count occurring in Detroit and arrived between 9:30 and 9:45 a.m.

8. Prior to my admission to the floor where the absent voter count was occurring, I received credentials from the Michigan Republican Party and further instruction regarding the process for handling ballots at absent voter counting boards (“AVCBs”).

9. Thereafter, I received a temperature scan from election officials that confirmed I did not have an elevated temperature. I arrived inside, and I was “checked in” by an election official who reviewed my driver’s license and confirmed my credentials and eligibility to serve as a challenger. I was admitted at approximately 10:30 a.m.

10. When I arrived at a counting table and began to observe the process, I noticed immediately that part of the process that was being implemented did not conform to what I had been told in my training and the materials that I had received.

11. Specifically, the information I had received described the process that was supposed to be occurring at the tables as follows.

12. A first election official would scan a ballot. If the scan did not confirm a voter in the poll book, that official would then check the voter against a paper copy “supplemental poll book.”

13. The official would then read the ballot number to a second election official and hand the ballot to that official, who would remove the ballot (while still in the secrecy sleeve) and confirm the ballot number. That second official would then hand the ballot (in the secrecy sleeve) to a third official who would tear the stub off of the ballot, and place the stub in a ballot stub envelope, then pass the remaining ballot to a fourth official.

14. The fourth official would then remove the ballot from the secrecy sleeve, flatten the ballot to ensure it was capable of processing, and visually inspect for rips, tears, or stains before placing the ballot in the “ballots to be tabulated box.” However, if that fourth official identified a

concern, she would place the ballot back in its envelope and into a “problem ballots” box that required additional attention to determine whether they would be processed and counted. A copy of a diagram that I had received on this process is attached as Exhibit A to this affidavit.

15. What I observed immediately was that the secrecy of the ballot was not being respected.

16. Instead, the second official at the table where I was observing was repeatedly placing her fingers into the secrecy sleeve to separate the envelope and visually peek into the envelopes in a way that would allow her to visually observe the ballot and identify some of the votes cast by the voter.

17. Sometimes, the third official whose job was merely to remove the stub from the ballot would likewise remove the ballot from the secrecy sleeve or otherwise peek to observe the ballot. Sometimes a ballot would be removed completely from the secrecy sleeve and then placed back inside and passed along this process.

18. I conferred regarding this issue with another challenger at a nearby table, and he indicated he had observed similar irregularities regarding the use of the secrecy sleeves.

19. When that challenger raised the issue with a supervisor, and he was immediately asked “why does it matter?” and “what difference does it make?”

20. Beyond the legal requirements for maintaining ballot secrecy, both of us were concerned that the violations of the secrecy of the ballot that we witnessed could be or were being used to manipulate which ballots were placed in the “problem ballots” box.

21. Later that morning, at another table, a challenger identified concerns that ballots were being placed into “problem ballots” boxes purportedly based on the reason that the voter had failed to place the ballot in the secrecy sleeve, while other ballots at the same table were being

passed along and placed into the “ballots to be tabulated” box that also did not have secrecy sleeves.

22. I personally observed that several ballots were placed into the “problem ballots” boxed and marked with a sticky note indicating that they were “problem ballots” merely because of the lack of a secrecy sleeve.

23. When I spoke with a supervisor regarding this issue, he explained that these ballots were being placed in the “problem ballots” box for efficiency.

24. From my experience at the first table I had visited (addressed in Paragraphs 15 through 17 above), I had also witnessed ballots that were placed into the “ballots to be tabulated” box that had arrived without a secrecy sleeve. So the differentiation among these ballots despite both ballots arriving in secrecy sleeves was perplexing and again raised concerns that some ballots were being marked as “problem ballots” based on who the person had voted for rather than on any legitimate concern about the ability to count and process the ballot appropriately.

25. Just before noon, I arrived at another table (which I later contemporaneously noted as AVCB # 23), and I conferred with the Republican challenger who had been observing the process from a viewing screen and watching the response of the computer system as ballots were scanned by the first official.

26. I asked the challenger if she had observed anything of concern, and she immediately noted that she had seen many ballots scanned that did not register in the poll book but that were nonetheless processed. Because she needed to leave for lunch, I agreed to watch her table.

27. As I watched the process, I was sensitive to her concern that ballots were being processed without confirmation that the voter was an eligible voter in the poll book, so I stood at the monitor and watched.

28. The first ballot scanned came in as a match to an eligible voter. But the next several ballots that were scanned did not match any eligible voter in the poll book.

29. When the scan came up empty, the first official would type in the name “Pope” that brought up a voter by that last name.

30. I reviewed the running list of scanned in ballots in the computer system, and it appeared that the voter had already been counted as having voted. Then the first official appeared to assign a number to a different voter as I observed a completely different name that was added to the list of voters at the bottom of a running tab of processed ballots on the right side of the screen.

31. That same official would then make a handwritten notation on her “supplemental poll book,” which was a hard copy list that she had in front of her at the table.

32. The supplemental poll book appeared to be a relatively small list.

33. I was concerned that this practice of assigning names and numbers indicated that a ballot was being counted for a non-eligible voter who was not in either the poll book or the supplemental poll book. From my observation of the computer screen, the voters were certainly not in the official poll book. Moreover, this appeared to be the case for the majority of the voters whose ballots I had personally observed being scanned.

34. Because of this concern, I stepped behind the table and walked over to a spot behind where the first official was conducting her work.

35. Understanding health concerns due to COVID-19, I attempted to stand as far away from this official as I reasonably could while also being able to visually observe the names on the supplemental poll book and on the envelopes.

36. Partly inhibiting my ability to keep a distance, the tables were situated so that two counting tables were likely a maximum of eight feet apart. In other words, you could not stand more than four feet behind one without being less than four feet from another.

37. As soon as I moved to a location where I could observe the process by which the first official at this table was confirming the eligibility of the voters to vote, the first official immediately stopped working and glared at me. I stood still until she began to loudly and aggressively tell me that I could not stand where I was standing. She indicated that I needed to remain in front of the computer screen.

38. I responded, "Ma'am, I am allowed by statute to observe the process." As I did, a Democratic challenger ran towards me and approached within two feet of me, saying "You cannot speak to her! You are not allowed to talk to her." I responded, "Sir, she spoke to me. I was just answering her."

39. The first official again told me that the only place I was allowed to observe from was at the computer screen. A second official at the table reiterated this. I said that was not true.

40. Both officials then began to tell me that because of COVID, I needed to be six feet away from the table. I responded that I could not see and read the supplemental poll book from six feet away, but I was attempting to keep my distance to the extent possible.

41. Just minutes before at another table, a supervisor had explained that the rules allowed me to visually observe what I needed to see and then step back away. Likewise, on Election Day, I had been allowed to stand at equivalent distance from poll books in Lansing and East Lansing precincts without any problem. With this understanding, I remained in a position where I would be able to observe the supplemental poll book until I could do so for the voter whose ballots had just been scanned and did not register in the poll book.

42. Both officials indicated that I could not remain in a position that would allow me to observe their activities and they were going to get their supervisor.

43. This seemed particularly concerning because the Democratic challenger who raised concerns over my verbal response to the official had been positioned behind the second official (the one who confirms ballots as described in Paragraph 13) no further away than I was from the first official at that time and had not been stationed at the computer screen as the officials repeatedly told me was the only place that I could stay.

44. When the supervisor arrived, she reiterated that I was not allowed to stand behind the official with the supplemental poll book, and I needed to stand in front of the computer screen. I told her that was not true, and that I was statutorily allowed to observe the process, including the poll book.

45. The supervisor then pivoted to arguing that I was not six feet away from the first official. I told her I was attempting to remain as far away as I could while still being able to read the names on the poll book.

46. In an attempt to address her concerns, I took a further step away from the table and indicated I would try to keep my distance, and that I thought I was about six feet away from the first official. The supervisor then stood next to the chair immediately to the left of the first official and indicated that I was “not six feet away from” the supervisor and that she intended to sit in the chair next to the official with the poll book, so I would need to leave.

47. This supervisor had not been at the table at any time during the process, and she had responsibility for numerous ACVBs. Further, the supervisor’s choice of chairs was approximately three feet to the left of the first official and therefore in violation of the six-foot distance rule.



48. Accordingly, I understood that this was a ruse to keep me away from a place where I could observe the confirmation of names in the supplemental poll book. The supervisor began to repeatedly tell me that I “needed to leave” so I responded that I would go speak with someone else or fill out a challenge form.

49. I went to find another attorney serving as a challenger and returned to discuss the matter further with the supervisor. When I returned, she reiterated her assertions and insisted that there was nowhere where I could stand in conformity with the six-foot rule that would allow me to observe the supplemental poll book. Ultimately, to avoid further conflict with the supervisor, I agreed that I would leave that counting table and move to another table.

50. Between 1:30 p.m. and 2 p.m., my colleague and I decided to return to the suite that housed the Republican challengers to get lunch. We left the counting floor and went up to the Republicans second-floor suite.

51. About 30 to 45 minutes later, an announcement was made that challengers needed to return to the floor. As we attempted to return, we were made aware that the officials admitting people had limited the number of election challengers to another 52 people who would be allowed inside. I displayed my credentials and walked up to near the door where a small crowd was gathering to be let in.

52. Shortly thereafter, a man came out to announce that no one would be let in (despite the prior announcement) because the room had reached the maximum number of challengers. As he was asked why we would not be let in, he explained that the maximum number of challengers were determined from the number of names on the sign-in sheet, regardless of how many people had left the room.

GREAT LAKES JUSTICE CENTER


53. Many Republican challengers had left the room for lunch without signing out, including myself and my colleague. Accordingly, we were being arbitrarily “counted” towards this capacity limitation without actually being allowed into the room to observe.

54. When challengers raised this issue with the man at the door, he refused to discuss any solutions such as confirming the identify of challengers who had been previously admitted.


55. To the best of my recollection, I was never informed that if I left the room and failed to sign out that I would be refused admission or that there would be no means of confirming that I had been previously admitted.

56. The above information is true to the best of my information, knowledge, and belief.

57. Further affiant says not.

  
\_\_\_\_\_  
Zachary Larsen

On this 8th day of November, 2020, before me personally appeared Zachary Larsen, who in my presence did execute the foregoing affidavit, and who, being duly sworn, deposes and states that he has read the foregoing affidavit by his subscribed and knows the contents thereof, and that the same is true of his own knowledge and belief, except as to those matters he states to be on information and belief, and as to those matters he believes them to be true.

  
\_\_\_\_\_  
Stephen P. Kallman  
Notary Public, Eaton County, Michigan  
My Commission Expires: 11/26/2025

John

McGrath

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN

ANGELIC JOHNSON and SARAH  
STODDARD,

Plaintiffs,

v.

JOCELYN BENSON, in her official capacity  
as Michigan Secretary of State; and  
JEANNETTE BRADSHAW, in her official  
capacity as Chair of the Board of State  
Canvassers for Michigan,

Defendants.

No. 1:20-cv-1098

Hon. Janet T. Neff

**DECLARATION OF JOHN McGRATH**

I, John McGrath, make this declaration under 28 U.S.C. § 1746 and based on my personal knowledge and upon information and belief where noted.

1. I am an adult citizen of the United States and a resident of Michigan.
2. I volunteered to be an election challenger for a non-partisan group for the November 2020 election.
3. On Wednesday, November 4, 2020, I worked at the TCF Center in Detroit.
4. At around 3:00am, tens of thousands of absentee ballots arrived from Wayne County. Upon information and belief, these ballots were received after the election deadline of 8pm on November 3, 2020.
5. During the counting of these ballots, and the ballots I observed being counted on November 4, 2020 until the time I left at 9:30pm, I saw numerous ballots assigned to "Unlisted Voters."

6. Unlisted Voters are ballots with names of people not registered on any absentee voter list and yet these ballots were all being counted the same as those voters who were registered.

7. The Unlisted Voters had no dates of birth in the system in contrast to the registered voters who already had Dates of Birth either the electronic poll book or on the paper supplemental sheets.

8. Workers continually entered the default Date of Birth, January 1, 1900, into the computer system in order to process these votes.

9. There were an inordinate number of Unlisted Voter ballots.

10. I witnessed election supervisors lock volunteers and republican challengers out of the counting room at TCF Center.

11. I was able to enter the counting room at around 6:30 pm.

12. I saw ballots being processed for Absent Voter Counting Board (AVCB) #73 without any election challengers present. AVCB #73 had nearly completed their work when I reached their table.

13. I challenged three of the last few ballots that were being processed.

14. The Election Supervisor of AVCB #73 asked me why I was challenging the initial ballot. I informed her that it is an "Unlisted Voter" who is not registered on either the electronic nor paper list/roll of registered voters. She said, "Ok" and instructed the poll worker at the laptop computer to make note of the challenge for that ballot. I also wrote down the names on the ballots and the ballot numbers I challenged on my report.

15. Since there were no more ballots at County Board #73 at that time, I looked around for another table working on ballots. I eventually noticed another AVCB where

election workers were again processing ballots with no election challengers present. This table was AVCB #56.

16. I went over to the monitor to see what AVCB #56 was working on and saw they were processing the ballot for yet another “Unlisted Voter.” I immediately informed the Supervisor that I was challenging this ballot. She asked why, and I told her.

17. While I talked with the Supervisor, the poll worker started working on the next ballot which was another “Unlisted Voter.” I informed the Supervisor that I was challenging this ballot too for the same reason. Then the next ballot was also “Unlisted Voter,” and I informed the Supervisor again that I was challenging this ballot.

18. The Supervisor then told me that I don't have to keep telling her I am challenging each ballot and that she would note that I am challenging these and all subsequent “Unlisted Voter” ballots. I affirmed to her my challenge of all “Unlisted Voter” ballots for this AVCB. She said she would have this noted.

19. Although the Supervisor agreed to do this, I continued to write down the names and numbers of “Unlisted Voter” ballots that kept appearing. While doing so, I was approached by a woman who asked why I was challenging these ballots. I asked who she was, and she identified herself as a Democrat election challenger. I told her the reason why I was challenging all the “Unlisted Voter” ballots for AVCB #56. She started telling me why she thought the ballots should be processed but while I listened to her, I missed the ballot number of the next “Unlisted Voter.” I asked the Supervisor for this number since the last two digits of the ballot numbers were hidden on the computer monitor. The Supervisor refused to tell me the ballot number that I had missed.

20. “Unlisted Voter” ballots kept appearing, one after the other.

21. I tried to notate the ballots, but I was again approached by a man in a business suit who introduced himself as a lawyer with the Democrat party. The man asked how I was credentialed. I explained that I was with a non-partisan group. He then told me that the challenges I was making will not amount to anything. These two individuals tried to engage me in conversation in an effort to distract me from notating the “Unlisted Voter” ballots that poll workers were processing very quickly.

22. At this point, I had noted approximately two dozen “Unlisted Voter” ballots that were processed at AVCB #56. I was again approached by a challenger with the Democrat party. She asked me who I was with. I explained that I was with a non-partisan group. She then accused me of being a Republican. It was another attempt to engage me in conversation and distract me from documenting challenges.

23. A large number of ballots were being processed very quickly, so it was impossible for me to catch all “Unlisted Voter” ballots.

24. I do recall clearly that one of the “Unlisted Voter” ballots at this AVCB came from Saginaw, Michigan which is not even in Wayne County.

25. When AVCB #56 got to the end of processing these ballots, I noted that the total number of ballots processed was 1,454.

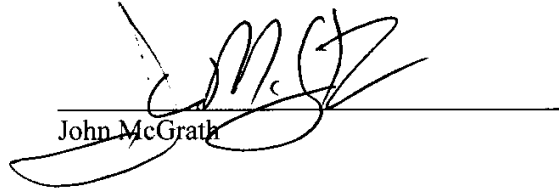
26. Due to COVID-19 regulations, I stood far away from the table with the election workers and the table supervisor would not let me use the corner of the table nearest me to write on. However, I frequently saw the Supervisor standing closer to the poll workers than I would have been had she let me use the corner of the table nearest me to write on.

27. In hindsight, I question whether my challenges of “Unlisted Voters” for AVCB #56 were notated as the Supervisor indicated they would be.

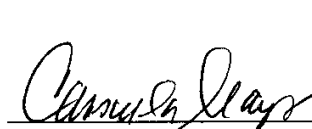
28. If they were not notated as the Supervisor indicated they would be, it means my challenges were not handled in good faith.

29. The above information is true to the best of my information, knowledge, and belief.

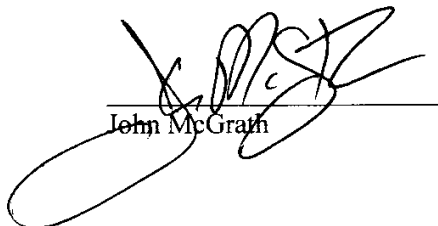
30. Further affiant says not.

  
John McGrath

On this 20<sup>th</sup> day of November, 2020, before me personally appeared John McGrath, who in my presence did execute the foregoing affidavit, and who, being duly sworn, deposes and states that he has read the foregoing affidavit by him subscribed and knows the contents thereof, and that the same is true of his own knowledge and belief, except as to those matters he states to be on information and belief, and as to those matters he believes them to be true.

  
Notary Public, Oakland County, Michigan  
My Commission Expires: April 1, 2025

CONSUELA MAYS  
NOTARY PUBLIC - MICHIGAN  
WAYNE COUNTY  
MY COMMISSION EXPIRES APRIL 01, 2025  
ACTING IN WAYNE COUNTY

  
John McGrath



Mordechae

Mendelbaum

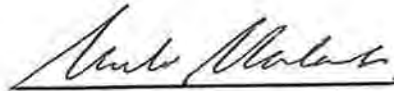
**AFFIDAVIT OF MORDECHAI MANDELBAUM**

Mordy Mandelbaum, being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. I am a registered voter in the State of Michigan.
3. I was a credentialed Republican challenger at Cobo Hall Tuesday night, November 3 and Wednesday, November 4.
4. I observed a poll worker completing a ballot without a spoiled ballot present. I asked: “[w]hat are you doing?” The poll worker did not respond.
5. I believe poll workers were duplicating ballots to incorrect precincts in order to run two ballots through for the same person. This was very common throughout the night. I observed this approximately 20-30 times at the table I was watching.
6. Duplicate of ballot #00239 at Table AVCB 8 ( ballot # 01570) was duplicated to the wrong ballot. The poll worker brought a precinct #6 ballot instead of the correct precinct. The new duplicate ballot was # 01571. Because of this suspected mismatch, I asked to see these ballots side by side and was denied access to view these ballots.

7. I spoke to a fellow challenger, who overheard poll workers talking about ganging up on her by strongly discouraging her to challenge.
8. An absentee ballot challenger representing the Democratic party approached me and asked if I wanted her to relieve me since "we are here for the same job" and then proceeded to tell me that she was going to go back to watching me. I replied that we were here to watch the ballots and not the other challengers.

Dated: November 8, 2020



Mordechai Mandelbaum

Mordechai Mandelbaum

Subscribed and sworn to before me on: *November 8, 2020*

Is: *Philip Needham*

Notary public, State of Michigan, County of: *Macomb*

My commission expires: *06/12/2026*

PHILIP NEEDHAM  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF MACOMB  
MY COMMISSION EXPIRES Jun 12, 2026  
ACTING IN COUNTY OF *WAYNE*

Whitney

Meyers

**AFFIDAVIT OF WHITNEY MEYERS**

Whitney Meyers, being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. On November 3, 2020 I was stationed as a volunteer for the Republican Party outside of the Detroit Department of Elections at 2978 W. Grand Blvd. I was there three times throughout the day. To the best of my recollection I was there from approximately 7:30am to 9:00am, from approximately 11:00am to 2:00pm and from approximately 6:45pm to 8:20pm.
3. On the street in front of the Department I witnessed workers with “Detroit Elections” aprons on collecting ballots from cars. I witnessed multiple drivers in cars drop off multiple ballots, including more ballots than people in the car.
4. I also witnessed workers with “Detroit Elections” aprons handing t-shirts and food into cars dropping off ballots. The t-shirts appeared to be from a non-profit voting advocacy group.
5. At 8:00pm workers from the Detroit Department of Elections locked the front door of the office, said they were accepting no more ballots and ceased to collect ballots from cars.

6. There was a ballot drop box in front of the Department of Elections office. After 8:00pm and after workers of the Detroit Department of Elections announced they were accepting no more ballots I witnessed an individual place ballots into the drop box before workers from the Detroit Department of Elections had a chance to place a lock on it. Nothing was done to find or separate these ballots.
  
7. As workers from the Detroit Department of Elections were retrieving ballots from the drop box after 8pm and after it was announced that they were no longer accepting ballots, I witnessed a worker from the Detroit Department of Elections named "Travis" accept a ballot from a woman on the street and place it with the other ballots. I confronted him about this, but he did not remove the ballot.

Dated: November 7, 2020

*Whitney Meyers*

[Print name]

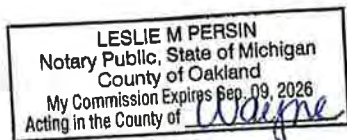
Whitney Meyers

Subscribed and sworn to before me on:

/s/ *Leslie M Persin*

Notary public, State of Michigan, County of:

My commission expires: *9-9-2026*



Matthew

Mikolajczak

RECEIVED by MSC 11/26/2020 2:44:13 AM

Matthew Mikolajczak

PH#: 734-513-9780

Email: [MattM-ERI@att.net](mailto:MattM-ERI@att.net)

Zip Code: 48375

State: Michigan

County of Incident: Wayne

Name of polling place: TCF

November 3<sup>rd</sup> – 7:00 am to 10PM shift

Incident #1

Opening announcement - "how many republican poll workers are here? From where I was standing - Board #41 - I could not see even one raised hand. There was not a republican worker to be found at the board tables near or around me. My wife and I had volunteered to be republican poll workers and were told poll workers were no longer needed. As there were 134 boards at TCF – there should have been at least 134 republicans assigned as poll workers with one seated at each of those boards.

The 25 tabulator machines required two poll workers as well – so an additional 50 poll workers – 25 which should have been republicans. The tabulator actually counts the ballots – and there was no equal representation at these sites.

With this obvious unfair worker representation – how was counting even allowed to take place?

The Michigan SOS claims there was equal representation – where is the proof or list of republican poll workers? As I understand it now - the assistant of the ex- mayor of Detroit filled these poll worker positions. My wife and I ended up working at TCF as poll challengers.

DANIELA VEBER  
NOTARY PUBLIC, WAYNE COUNTY, MI  
My Commission Expires 06/15/2025  
Acting in the County of OHIO



RECEIVED by MSC 11/26/2020 2:44:13 AM

Matthew Mikolajczak

PH#: 734-513-9780

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Zip Code: 48375

State: Michigan

County of Incident: Wayne

Name of polling place: TCF

November 3<sup>rd</sup> – 7:00 am to 10PM shift

Incident #2

11/3/20 at 8:07 AM

Board #41 board monitor was flashing "Backup Overdue!" in RED LETTERS right hand lower corner of monitor. This message was not occurring on surrounding board monitors - just this one. I told board supervisor - Tonya Anderson - she said she would inquire with IT. I never got a response as to why this was happening. Later in the day I noticed multiple monitors flashing same message on other nearby board monitors.

11/4/2020 11:38am - flashing message "Backup Overflow" on most board monitors.

*Matthew Mikolajczak*

*Daniela Veber*

DANIELA VEBER  
NOTARY PUBLIC, WAYNE COUNTY, MI  
My Commission Expires 06/15/2025  
Acting in the County of WAYNE

RECEIVED by MSC 11/26/2020 2:44:13 AM

Matthew Mikolajczak

PH#: 734-513-9780

Email: [MattM-ERI@att.net](mailto:MattM-ERI@att.net)

Zip Code: 48375

State: Michigan

County of Incident: Wayne

Name of polling place: TCF

Incident #3

11/3/20 at 10:26 am

Board #41 monitor pop up – Microsoft has prevented a hack attempt. I went to area supervisor – Tonya Anderson and showed her (she witnessed) and she proceeded to get IT worker to view. By the time IT arrived pop up was gone. Darrell Finken was the area poll challenger and was made aware of the Microsoft message (message gone by time he arrived), Raphael Washington was the team leader of the board.

Jean Kordenbrock – Trump lawyer - was made aware of incident and was present at board #41 ( message had vanished before she arrived). I was asked if I would sign affidavit and I said I would. I gave my contact info to Trump legal team. The supervisor – Tonya Washington verified she had seen the message. Tonya said it was just the firewall protecting the system and she sees this all the time with her home computer. Tonya mentioned the message said prevented – so nothing to worry about. She has Norton on her computer at home and it works just fine. Issue is why were these board computers on a non local, secure intranet system? I asked IT tech and he said he only worked on tabulator network and had nothing to do with board network.

*Matthew Mikolajczak*

*Daniela Veber*

DANIELA VEBER  
NOTARY PUBLIC, WAYNE COUNTY, MI  
My Commission Expires 06/15/2025  
Acting in the County of WARREN

RECEIVED by MSC 11/26/2020 2:44:13 AM

Matthew Mikolajczak

PH#: 734-513-9780

Email: [MattM-ERI@att.net](mailto:MattM-ERI@att.net)

Zip Code: 48375

State: Michigan

County of Incident: Wayne

Name of polling place: TCF

Incident #4

11/3/20 Tabulator ICC10 , AVCB # 46 , 3:50PM

Multiple batch runs of what appeared to be same ballots 2/3 times. I couldn't see software being zeroed between runs and the operator - refused to let me see count - intrusion of her space.

4:08PM Operator was pulling ballots from jam midstream - not zeroing and just continuing runs. Multiple batch jams - ballot reshuffles with pulling and placing of ballots into stack and midstream restarts. Over counts and under counts - from what I could occasionally see from six feet away.

*Matthew Mikolajczak*

*Daniela Veber*

DANIELA VEBER  
NOTARY PUBLIC, WAYNE COUNTY, MI  
My Commission Expires 06/15/2025  
Acting in the County of WAYNE



RECEIVED by MSC 11/26/2020 2:44:13 AM

Matthew Mikolajczak

PH#: 734-513-9780

Email: [MattM-ERI@att.net](mailto:MattM-ERI@att.net)

Zip Code: 48375

State: Michigan

County of Incident: Wayne

Name of polling place: TCF

Incident #5

Nov 3rd, 2020

At around 4:30PM the TCF poll lead came over the loudspeakers and asked for our attention. He congratulated us on having processed 60,000 ballots from the opening (which didn't start until around 10am). Shortly thereafter ~5:00PM - about 40% of the counting floor workers headed for the upstairs break area for lunch/dinner and refreshments.

At around 7:00 PM I heard that the count was now at 128,000 ballots processed. How could 68,000 additional ballots get processed in 2.5 hours - with a reduced work crew? It took 6.5 hours to process 60,000 earlier?

The floor was starting to shut down at 7:15pm for supposed cleaning and many poll workers were actually putting coats on leaving - not through the front doors but via the upstairs refreshment room escalator - well before their 8:00PM scheduled work end time. After around 10/15 minutes of this mass exodus, the TCF lead came over the loudspeaker system and had to warn them to stay at their boards or they wouldn't get paid. Some workers came back down to their respective boards via the escalator from the upstairs break area. On Wednesday -when I exited from those upstairs doors because of the crowds, chanting and window covering going on at the front entrance - I realized that the upstairs area had public access doors people could exit from - or potentially bring stuff in with them - under coats or in lunch coolers. I don't know if anyone was watching those upstairs doors - be it TCF security, poll watchers, poll challengers or police. Definitely a potential breach of sequester policy and an open opportunity for ballot fraud.

*Matthew Mikolajczak*

*Daniela Veber*  
DANIELA VEBER  
NOTARY PUBLIC, WAYNE COUNTY, MI  
My Commission Expires 06/15/2025  
Acting in the County of OSHTON

RECEIVED by MSC 11/26/2020 2:44:13 AM

Matthew Mikolajczak

PH#: 734-513-9780

Email: [MattM-ERI@att.net](mailto:MattM-ERI@att.net)

Zip Code: 48375

State: Michigan

County of Incident: Wayne

Name of polling place: TCF

Incident #6

11/4/20 from 11:30AM to 4:30PM

Observed new, hostile attitude by most poll workers – even negative verbal comments. Lots of workers demanding to stay six feet away – telling me I had to stay six feet away. I used the paper saying we were allowed to get closer to review the counts – but workers seemed to block screens and impede monitoring at every opportunity. Tabulator supervisors were NOT helpful and claimed the same six foot distancing demand. After I stood my ground, showed them paper explaining our rights - they left. I believe these people were trying to intimidate new people that were not aware of their rights to get closer than six feet. Democrat lawyers, there everywhere on Wednesday, were also interjecting (harassing) me for trying to read the tabulator counts. They called security and the tabulator operator – much to my surprise – told security I was only doing my job and he left. Then supposed poll watchers ( they had no credentials I could see) – basically young women agitators began harassing me and another tabulator watcher saying we were spreading covid (verbal harassment and intimidation)– I showed them my paper stating our rights and told them to stand away from me. After the agitators left my wife and I were watched by two democrat lawyers for over an hour standing directly behind us while we were trying to monitor the tabulators.

In general, they were removing jammed ballots and just continuing on with the runs. We were told they were supposed to remove the jam, reset the tabulator and run the entire stack. That was not the procedure that was being followed at TCF – either day I worked there or at any tabulator site I watched.

I also noticed – way too frequently, the jams occurred at ballot 27 in the count (on different tabulator machines, different operators). The operator would remove the jam – usually a dog eared corner on the document or left over piece of removed top ballot – and then just proceed with the count. I could not get close enough to see what the vote on the dog eared ballot was (Trump or Biden) – but this scenario sure occurred way too frequently. I wondered if the board people were purposely dog earring the ballot to create the jam and get the Trump vote removed. A fellow poll challenger said he observed there were typically about 1 or 2 Trump votes per batch he could discern while watching the boards. Were these the ballots purposely used to jam the tabulators? I don't know and I was not allowed – stopped by supervisors - to talk to the operators or ask questions of them. I did notice the one performance indicator was at 46/47 – meaning – I think - the average run was 46 or 47 ballots. The batches were supposed to be 50 ballots – so, if this was the case, these machine count averages weren't very good. Or were the Trump ballots not being counted ..... I don't know. Would have helped to have the tabulator user manuals available at poll challenger training sessions so we understood what we were watching and what tampering could have been going on.

*Matthew Mikolajczak*

*Janiela Yeber*  
JANIELA YEBER  
NOTARY PUBLIC, WAYNE COUNTY, MI  
My Commission Expires 06/15/2025  
Acting in the County of Wayne

RECEIVED by MSC 11/26/2020 2:44:13 AM

Matthew Mikolajczak

PH#: 734-513-9780

Email: [MattM-ERI@att.net](mailto:MattM-ERI@att.net)

Zip Code: 48375

State: Michigan

County of Incident: Wayne

Name of polling place: TCF

Suggestions:

NO BLACK pens or markers should have been allowed on the counting floor – just like phones/cameras or any communicating electronics. Red pens should have been used for any administrative purposes stopping board workers from filling in Biden on republican straight ticket ballots and allowing challengers and watchers to be sure no candidate selection tampering was occurring.

Tabulator screen counts, control buttons, should have been done in much larger, bold fonts allowing for observation from 10 feet minimum. Control buttons presses/selections should have been shown in writing on screen for at least 5 seconds (again bold and very large font). Tabulator screen wasn't even 20% utilized – making any monitoring impossible from more than a foot away. Ridiculous.

Need a mandate that every tabulator be manned with one republican and one democrat.

Tabulator user manuals should have been available at training sessions. When the workers are not allowed to answer questions and poll watchers/challengers not allowed to talk to workers – very difficult to credibly watch what is happening and why.

*Matthew Mikolajczak*

*Daniela Veber*

DANIELA VEBER  
NOTARY PUBLIC, WAYNE COUNTY, MI  
My Commission Expires 06/15/2025  
Acting in the County of DAKOTA

Phillip

O'Hallaren

Nov. 20. 2020 5:45PM Village Health

No. 1957 P. 1

### Village Health

Urgent and Family Care

12150 30 Mile Rd. Washington, MI 48065

PH: (586) 752-7256

FAX: (586) 331-2323

### FACSIMILE TRANSMITTAL SHEET

DATE: 11-20-2020

ATTN: ERIN

FAX NUMBER: 248-429-1465

RE: AFFIDAVITS - PHILIP + CYNTHIA O'HALLORAN

NUMBER OF PAGES, INCLUDING COVER: 15 INCLUDING COVER SHEET.

COMMENTS:

From: PHIL O'HALLORAN 248-260-0522

- ① AFFIDAVIT - PHILIP M. O'HALLORAN - 3 pgs.
- ② STATEMENT - PHILIP M. O'HALLORAN - 2 pgs.
- ③ DECLARATION PHILIP M. O'HALLORAN - 5 pgs.
- ④ OAKLAND COUNTY OBSERVATION - CYNTHIA O'HALLORAN - 2 pgs.
- ⑤ STATEMENT - SATELLITE CYNTHIA O'HALLORAN - 2 pgs.

THANK YOU!

**Confidentiality statement:**

The attached information is CONFIDENTIAL and is protected under the Privacy Act of 1974. It is intended for the use of the addressee(s) identified above. This faxed material must be destroyed appropriately when its use is no longer required. If the reader of this message is not the intended recipient(s) or the employee or agent responsible for delivering the attached information to the intended recipients(s), please note that any dissemination distribution, or copying of this communication is strictly prohibited. Anyone who receives this communication on error should notify Village Health immediately and return the original message to the address as the top of the cover sheet via U.S. mail.

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Nov. 20. 2020 5:45PM Village Health

No. 1957 P. 2

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**Affidavit of Philip M. O'Halloran**

Philip M. O'Halloran, being sworn, declares under penalty of perjury:

I Philip M. O'Halloran, a register voter in and citizen of the State of Michigan make the following statement of record.

Re: Movements of white Penske moving truck on November 4<sup>th</sup>.

At 3:15 pm on November 4<sup>th</sup>, I spoke with Andre Gilbert on the floor of the TCF Center. He is an official working for the Department of Elections, who assured me that there would be no further ballots brought over from the Department of Elections or anywhere else. I asked if all the drop boxes had been emptied and ballots had been brought to the TCF Center. He answered that they had. I asked if the drop boxes were still capable of having ballots placed inside, and he said that they had been locked and that they were scheduled to be pulled off the streets in a few days. I asked if any ballot was found at the postal service and delivered late, would it be counted and he said "absolutely not".

At approximately 5:30pm on Wednesday, November 4<sup>th</sup>, 2020, I drove to the alley off 3<sup>rd</sup> Avenue due south of West Grand Blvd and due west of the Detroit Department of Elections (DOE). I was with three other people who were Republican election observers watching the election-related activities outside the Department of Elections.

We observed the comings and goings in the alley for several minutes when I remarked to the others that there was a white Penske Truck parked on 3<sup>rd</sup> Avenue and pointing in the direction of West Grand Blvd., that was similar, if not identical, to the one that we'd seen transporting pallets of completed 2020 General Election ballots from DOE to the TCF AV Counting Board.

Several minutes later I noticed that there was a heavy duty white pickup truck behind the white Penske truck and inside there were two heavy set black males in their twenties who appeared to be watching the Penske truck. They were just sitting idle, not doing anything but looking straight ahead at the truck.

Our group decided to depart the area, but before I left, I walked south along 3<sup>rd</sup> Ave. to the light/stop sign? and crossed over to the side of the street where the Penske (lic plate 2352303) and pickup (City of Detroit #186227) were parked.

I then photographed the truck and the passenger side of the pickup, which had both its passenger side wheels on the sidewalk, the same as did the Penske truck and another, white pickup further down the street toward West Grand Blvd. (see photo).

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I walked around the front of the pickup and politely addressed the two occupants "excuse me, I'm doing some election observing. Could you tell me what's in the truck right there? Are there any ballots in there?". The driver responded "No, it's empty". I left the area shortly afterward.

Later in the evening, I returned with my wife, Cindy at approximately 9:30 pm, at which time we noted that both the Penske truck and the pickup truck were still in the same location and, notably, the two occupants were also still seated in the pickup. We suspected that they had been there for the past four hours or more and wondered why they were essentially guarding an empty delivery truck into the night hours.

My wife and I left the area and proceeded to TCF Center, where we attempted to enter to perform challenger duties for the GOP, but were denied entry to the building by security. We left soon after this and decided to drive back to the DOE. As we approached, we witnessed the white Penske truck driving West on first W. Milwaukee Avenue and then West Grand Blvd. We surmised that it had turned into the alley behind the DOE, possibly picked up a load at the building's rear loading area and then turned right onto 2<sup>nd</sup> Avenue, and right onto W. Milwaukee. The white pickup was no longer present. We followed the Penske truck from a distance down the Lodge Freeway and onto Steve Yzerman Drive and watched it slowly back into one of the service entrances behind the TCF Center and, after several minutes, it disappeared inside the TCF Center (see photos and video).

At this time, we proceeded to the front of TCF and managed to enter the building. We went down the stairs to the entrance to the AV Counting Board where we were denied entry by members of a 6-8-person Special Operations team of tactical Detroit Police officers led by a Sgt. Barrick. After what was, at times, a heated discussion between the election authorities who barred our entry and a GOP official named Brian Szmytke and an ensuing more civil discussion with the police and later Sgt. Barrick, I informed the Sergeant of my concerns that the white Penske truck MAY be delivering ballots to the TCF Center, which we had observed it doing on at least one occasion prior to Election Day. I explained that the truck would enter through the garage door (sally port) at the rear of the TCF Counting Board room. I added that, if there are ballots in the truck, and if they arrived *after* the close of the polls at 8 pm on November 3<sup>rd</sup>, that such delivery and subsequent counting of these late ballots would be a crime (see video).

The sergeant agreed to look into it but admitted that he would not be searching the truck himself, but rather would refer it to Detroit police investigators. I asked how soon that could take place. He didn't answer definitively. At this point, Mr. Szmytke, asked the sergeant if he could check to see if the truck was inside the building as I had claimed. Sgt. Barrick agreed to do this. I then proceeded to my car and drove again to the rear of the TCF Center on Steve Yzerman Drive to confirm that the truck was not leaving. I watched if for perhaps half an hour and then left the area. I was unable to learn what the sergeant found, if anything, regarding the white Penske truck.

Signature page attached

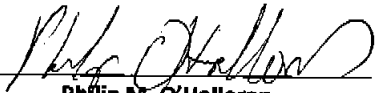
Nov. 20. 2020 5:46PM Village Health

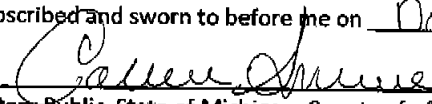
No. 1957 P. 4

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**Affidavit of Philip M. O'Halloran**

Signature page

Dated November 20th, 2020   
Philip M. O'Halloran

Subscribed and sworn to before me on November 20th 2020  
  
Notary Public State of Michigan, County of Oakland.

My Commission Expires: 12-30-2024

CATHERINE SWETCH  
Notary Public, State of Michigan  
County of Oakland  
My Commission Expires Dec. 30, 2024  
Acting in the County of Oakland



Nov. 20. 2020 5:46PM Village Health

No. 1957 P. 5

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Statement of Philip M. O'Halloran regarding observations on October 8<sup>th</sup>, 2020

I, Philip M. O'Halloran, a Republican was performing volunteer election observations with my wife, Cynthia O'Halloran, outside the Adams Butzell Detroit Absent Voter Satellite Center at 10500 Lyndon St. on the above date.

We entered the facility and spoke for a while with two election workers there. This went smoothly and we returned to our car. While I was observing the surveillance camera system outside, my wife and I noted a young lady, who looked to be between the ages of 18 and 23, walk from her car in front of us toward the facility's entrance. She was openly carrying 3 ballots as if she was dropping them off inside. Several moments later she came out of the building (without the ballots) and returned to her car. My wife noted several dreadlocks throughout her hair and she had khaki pants and a light pastel button down blouse. She appeared to have a Millato complexion and a bigger-boned body appearance.

Less than an hour later, after we had left the above facility and gone to Northwest Activity Center Absent Voter Satellite Center, 18100 Meyers Rd., we were talking with a supervisor, a Ms. Outlaw, who was explaining the system and answering our questions.

While we were conversing with Ms. Outlaw inside the center, someone walked in the door approximately 15 feet to our right and began walking in the direction of Ms. Outlaw. My wife noted that it was the same girl with braids that we had seen at the Adams Butzell Center. At the same time, I also turned to look at her and noted that she was carrying what I estimated to be at least 5-6 ballots openly in one hand. This struck me as suspect since Michigan law requires only immediate family members or people living together to handle ballots, other than their own, with a few other exceptions that didn't seem to apply here.

When I glanced back at Ms. Outlaw she appeared to be concerned that we were viewing the young lady with the ballots and moved quickly to *physically interpose herself* between us and the woman so that we could no longer see the ballots. She appeared to be holding her hands up, palms facing the young woman in a signal to move back toward the door she came in through. At the same time, the young woman glanced quickly at my wife and I with a look of concern. She stepped back toward the door and, at the non-verbal direction of Ms. Outlaw, placed the ballots into a small box that was just inside the door.

At this point, Ms. Outlaw returned to us and resumed the conversation before we left the room. While walking out I looked down into the small box to view clearly the stack of half a dozen or so ballots that the young lady had brought in and confirmed that they appeared to be completed ballots with a signature on the outside. She soon led us upstairs, where I asked to view the surveillance equipment that was monitoring the outside drop-boxes.

There, I asked her where ballots were stored after collection and she stated that they were stored in a locked room, to which only she has the key. I then asked about a hypothetical situation, in which a person was seen by staff to be inserting, say, one hundred ballots into the

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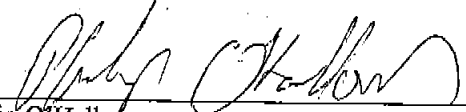
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drop box or submitting them to the center's staff. I asked what her staff's response would be and she said that this would definitely raise concerns, since it would not be viewed as legal.

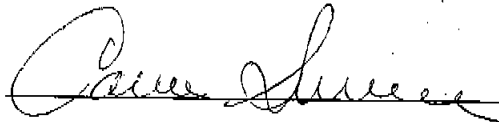
I said that was reassuring but then raised the issue of the young woman carrying six ballots into the center that we had witnessed downstairs. She paused before responding "she...works for me". I asked her why she was bringing them inside the center instead of upstairs to the locked room. She paused again and stated "she got them from the locked room". I stated, "but, wait, I thought only you have the key, right?" At this point she said something to the effect of "where are we going with this?", after which I said I was just trying to understand why she would be bringing ballots into the AV Center from the locked room upstairs. She did not have an answer and with the conversation apparently at an impasse, my wife and I thanked her for her time and left the facility not long afterward.

I declare under penalty of perjury, that the foregoing statements are true and correct.

DATED this 20<sup>th</sup> day of November 2020.

  
Philip O'Halloran

On this 20<sup>th</sup> day of November, 2020, before me personally appeared Philip O'Halloran, who in my presence did execute the foregoing affidavit, and who, being duly sworn, deposes and states that he has read the foregoing affidavit by him subscribed and knows the contents thereof, and that the same is true of his own knowledge and belief, except as to those matters he states to be on information and belief, and as to those matters he believes them to be true.



Notary Public, Oakland County, Michigan  
My Commission Expires: 12-30-2024

CATHERINE SWETICH  
Notary Public, State of Michigan  
County of Oakland  
My Commission Expires Dec. 30, 2024  
Acting in the County of Oakland

Nov. 20. 2020 5:47PM Village Health

No. 1957 P. 7

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**DECLARATION OF PHILIP O'HALLORAN**

I, Philip O'Halloran, under penalty of perjury, declare as follows:

1. I am at least 18 years of age, and I have personal knowledge of the facts as stated in this Declaration.
2. I am registered to vote in the state of Michigan.
3. On or around October 8th my wife Cynthia O'Halloran and I went to the Detroit Department of Elections on West Grand Blvd. in Detroit. I wanted to participate in the political process and exercise my rights as poll challenger during the signature verification and ballot handling process, which was being done differently than in prior elections in which I had volunteered. I was also concerned about the possible use of the Relia-vote ballot processing system. My wife signed up as a poll worker and shared my concerns. We also wanted to learn about other opportunities, namely when and where we could observe the processing of absentee ballots and learn about the entire procedure, including the camera monitoring of the thirty or so drop boxes located throughout the city. We met Mr. Caven West, Deputy Director to the Detroit City Clerk. Mr. West was either unable or unwilling to provide us access to observe the signature verification process and procedure regarding ballot security. Mr. West was either unwilling or unable to answer many of our questions related to other opportunities to participate in the process. Mr. West gave me his email address and offered to track down the information we were seeking if I sent him a follow up email detailing our requests. He refused to provide us with his phone number.
4. On October 12, 2020 I sent an email to Mr. West. The email (a copy of which is attached hereto) outlined our request to observe the processing of absentee ballots and view the ballot storage procedure. Mr. West still has not responded to that email.
5. On October 22, 2020 my wife, Steve Potter, Georgia Dixon and myself again went to the Detroit Department of Elections for answers. We were told Mr. West was out sick. We met with Mr. George Azzouz and Mr. Daniel Baxter. Here again, they were either unable or unwilling to provide us with many answers or meaningful access. Again, we were told to memorialize our requests via email and they assured us they would respond.

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- Specifically, they stated they would provide the detailed written procedure, followed by the DOE in the processing of absent voter ballots.
6. On October 26, 2020 I forwarded the email I had sent Mr. West to Mr. Azzouz and Mr. Baxter and again, emphasized our concerns and requests for access (also attached).
  7. On October 27, 2020 I received a less than fulsome response from Mr. Azzouz. It was still unclear how the signatures were being verified and we were still not able to ascertain when and where we could observe the signature verification process and ballot security and storage.
  8. My wife and I were repeatedly denied access to observe the signature verification process and to observe the storage and security procedure for absentee ballots.
  9. On November 1<sup>st</sup> Steve Potter and I again visited the DOE and met with a supervisor, who, after we showed our challenger credentials, did permit us to view a single signature verification. When Mr. Azzouz and Mr. Baxter saw this, they were unhappy with the supervisor and Mr. Azzouz let her know this. Upon further questioning, Mr. Azzouz did inform us, finally, that all ballots were stored in a locked room and that it was under 24/7 camera surveillance.
  10. On November 3, 2020 at approximately 2:30 p.m. I was present at the TCF Center located at 1 Washington Blvd., Detroit, Michigan 48226.
  11. TCF Center was used as the Detroit Department of Elections Central Counting Board, where absentee ballots are processed and counted.
  12. I was duly authorized and eligible to serve as a poll challenger at the TCF Center.
  13. I'm not sure when this occurred but I was given several blank incident reports and told to fill them out should I witness anything irregular.
  14. I was told during my training by the Republican party not to aggressively engage anyone verbally and to avoid speaking directly to poll workers but to direct questions and concerns to their supervisors.
  15. On November 3<sup>rd</sup>, at 2:45 p.m., a man knocked on the outside door next to the garage at the back of the TCF AV Counting Board. Several moments later, Daniel Baxter arrived and opened the door for him and two people entered with a Dodge Caravan (IL plates 118078). They brought in ten USPS trays of ballots. There were no signatures or hand-off paperwork at the ballot receiving table.

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16. At 3:25 p.m., four men walked in carrying two USPS trays from a Department of Elections van, plates 090490. They would not answer questions about where the ballots were from.
17. At 5:10 p.m., five USPS trays arrived at the back entrance, side door, DOE van plate 118078.
18. On either November 3<sup>rd</sup> or 4<sup>th</sup> (I can't recall for certain which day). I asked a supervisor a mundane procedural question, but our conversation was almost immediately interrupted by at least two loud and intrusive Democrats (lawyers or challengers – I did not see visible credentials) who stated that I could not ask her this question. I found such antagonistic behavior to be a frequent occurrence. Poll workers were told by Democrat operatives, some of whom refused to provide credentials on request, that their six-foot separation privileges or other rules were being violated (they were not). The poll worker would then protest loudly against the false injustice and I, or a GOP colleague, would soon look for a counting board with more cooperative workers.
19. On a later occasion, I was performing my duties as a challenger watching a poll worker compare the numbers on the ballot envelope and identification tab. I would lean in for about 1-2 seconds to match the numbers and then would swiftly step back to a six-foot separation. I did this with extreme deference to the poll worker, probably at the cost of accuracy in my observations. At one point, a heavy-set black male came walking very fast toward me and yelled “get back SIX FEET!” I told him I already was approximately six feet back but he loudly insisted I had to get back further and used his own height as a visual guide. I took a step back and was about to resume my duties when the poll worker – a large man in his thirties – whose work I had been observing, turned to the first man and said “THANK you. I was about to ELBOW him!” and he made a motion to me with his elbow. He then turned to me and said angrily: “you ‘bout to get an elbow!” I left that counting board not long afterward.
20. At the October 29<sup>th</sup> challenger conference on the floor of the counting board at TCF hosted by the chief election contractor for the City of Detroit, Chris Thomas, I had asked him if we would be permitted to challenge from the raised platform in the center of the counting board known as “the stage”. He had responded that he would “take that under advisement”. He never got back to me. On either November 3<sup>rd</sup> or 4<sup>th</sup> I asked fellow GOP



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challenger, Bob Cushman to join me in going up onto the stage. On it were maybe a dozen computers, apparently used to monitor the vote counts coming in from dozens of tabulators below. We asked a few of the half a dozen or so staff on the stage to explain the process to us but they declined. I then approached Mr. Thomas, seated at the back corner of the stage. He looked up and before I could complete a sentence angrily yelled "you get the hell down offa here!" I protested briefly that we should have a right as challengers to view this aspect of the vote count but then complied with his instructions.

21. On November 4<sup>th</sup> in the afternoon I was monitoring the transfer of the military ballots when we noted that a poll worker approached the tables adjacent to the ballot receiving tables, where a large (estimate 3,000) blank ballots were laying in several open postal trays. The worker picked up at about 3 blank ballots, without signing them out to anyone or logging them anywhere and walked back to her counting board. I followed her and then spoke with her supervisor despite loud objections from Democrats (whether challengers, lawyers or uncredentialed operatives, I don't know). I showed the supervisor that this worker had simply laid the ballots on the table in a haphazard, insecure fashion and I asked if there were several duplications that she was about to perform. She stated that there were not and that she was merely saving steps by pre-positioning the blank ballots in the event she needed them for a duplication. I alerted a GOP lawyer who took over the situation.
22. At around the same time frame I was told by a challenger that a fellow GOP challenger was being blocked from viewing duplications being performed by two Democrats. Those blocking her were two very large male Democrats who stood shoulder to shoulder. I was told that when the female GOP challenger asked to be permitted to see the process, they refused to comply and even blocked her by placing a large bin that blocked her access from the side. I came upon the situation as the challenger was walking away from the table appearing very distraught and I was able to confirm the shoulder to shoulder positioning of the two Democrats standing behind the duplicators.
23. On November 4<sup>th</sup>, several GOP challengers chanted "Stop the count" to alert the DOE management to our exasperation at being unable to perform our duties, even despite our lawyers pleadings. The chanting ended in less than two minutes. I then heard multiple loud hostile comments from poll workers and Dem operatives such as "throw 'em all

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out!” and “call the police!” About 20 police officers subsequently arrived. There were no scuffles that I could see.

24. My firm impression, based on multiple interactions involving both myself and my observations of other GOP challengers, between poll workers -- including several wearing “BLM” masks and/or tee shirts -- Democrat operatives, including lawyers and many uncredentialed persons acting in a thuggish manner, is that there was coordination of their actions and that the tactic of working together to make and support specious accusations against GOP challengers was deliberate and designed to intimidate, with the threat of police action against us, which was successful in several instances. I believe that the ultimate goal of the organizers of this reprehensible, flagrantly undemocratic behavior was to prevent we Republican challengers from adequately performing our duties. It was quite a successful ploy.

25. I also affirm that in many previous elections, in which I served as a challenger for the GOP, dating back to the mid 1990’s and in jurisdictions as diverse as Southfield, Rochester and Detroit, I have NEVER seen hostile, orchestrated obstruction of my ability to perform my lawful duties as a Republican challenger. In fact, as recently as August 4<sup>th</sup> of this year at the primary on the same TCF floor in Detroit, I was always treated with respect and was never hampered in any way in doing my job. Until November 3<sup>rd</sup> my interactions with poll workers, supervisors and election officials have always been cordial and professional. Therefore, I conclude that the well of good will and professionalism was poisoned deliberately by those with an agenda other than ensuring fair and honest AV Counting Board proceedings.

26. I declare under penalty of perjury, that the foregoing statements are true and correct.

DATED this 20<sup>th</sup> day of November 2020.

  
Philip O'Halloran

On this 20 day of November, 2020, before me personally appeared Philip O'Halloran, who in my presence did execute the foregoing affidavit, and who, being duly sworn, deposes and states that he has read the foregoing affidavit by him subscribed and knows the contents thereof, and that the same is true of his own knowledge and belief, except as to those matters he states to be on information and belief, and as to those matters he believes them to be true.

CATHERINE SWETICH  
Notary Public, State of Michigan  
County of Oakland  
My Commission Expires Dec. 30, 2024  
Acting in the County of Oakland



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No. 1957 P. 12

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OAKLAND COUNTY ELECTION  
OBSERVATION REGARDING CELL PHONE  
USE IN POD 2

I, Cynthia A. O'Halloran, under penalty of perjury, declare as follows:

I worked at Oakland County Elections on Tuesday, Nov. 3, 2020 as a duplicator for Military Absentee Voter ballots. The location was 2111 Pontiac Lake Rd, Waterford, MI, and I worked in Pod 2.

I observed a man walk into Pod 2 in the late afternoon/early evening and hold out a cell phone with his arms fully extended in front of him at eye level. He was about 10-15 feet to my right front. He held it out for approximately 1 minute. He was not texting. I thought it was unusual that he had his arms extended in that position for that long.

Note: a tabulator machine was located approximately 30 feet in front of him at 12'oclock at the opposite end of Pod 2.

Description of the man: Caucasian, mid to late 30's in age, 5'8 or 5'9 height, medium build (carried a few extra pounds). Dark hair, blue or green eyes.

I alerted people nearby "Hey, that man has a cell phone in here!" "We aren't allowed to have phones!" I'm sure he heard me. Then someone behind me said, "Oh, yeah that is the IT guy," so I assumed I should not worry or question his use of a cell phone further.

I did recognize that it was indeed the IT guy, who my supervisor Heather referred to at the beginning of the election process. The same man came back at the end of the night to sit at or near what I believe was the adjudication area. I, along with a supposed female Republican poll watcher, waited for the tally numbers to come out.

I left the Oakland County Election site approximately 11p.m or 11:15pm. I proceeded to walk to the lit parking area to where my vehicle was located. In the dark (what I would call the median), center of the horseshoe driveway, was an individual pacing with a lit cigarette. There was only one other vehicle at the time who was fortunately leaving when I was walking to my car. The median area was extremely dark, however, the person with the lit cigarette was moving quickly in my direction.

I suddenly felt very scared and walked even quicker to my vehicle. He was about 20-30 feet away and I started saying prayers. Fortunately, my car was parked where the other car was backing out and leaving. I made it to my vehicle safely and noticed that the individual who was carrying the lit cigarette was the same IT guy who has holding up his cell phone in Pod 2. He proceeded in the direction of some other vehicles.

Respectfully submitted,

*Cynthia A. O'Halloran*

Dyanna

Papsdorf

AFFIDAVIT OF

Dyanna Papsdorf being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.

2. I am a registered voter in the State of Michigan.

3. November 4 - TCF center around 2-10 PM

- no republican representation for poll workers during transferring military ballots
- differences between numbers on the ballot as on the envelope
- a number of people / ballots entered in the system that were not on the computer system or the paper list.
- denied access to the ~~room~~ processing room
- processing a ballot that had tabs ripped off
- a vast difference between the treatment of the dems/non partisan vs GOP
- many of my friends that wanted to help were locked out of the building
- entire room erupting in applause when a GOPer kicked out

Dated: November 8, 2020

Dyanna Papsdorf  
914-294-9513  
Nov. 8, 2020  
Dyanna Papsdorf

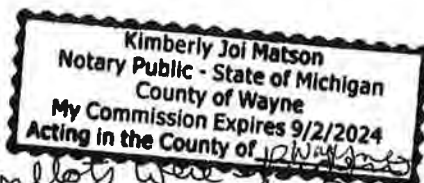
Subscribed and sworn to before me on: 11/8/2020

Kimberly Matson

Notary public, State of Michigan. County of: Wayne

My commission expires:

9/2/2024



- Military ballots 24 out of 26 ballots were for Biden RP

Bonnie

Pettibone

State of Michigan

Affidavit

#43-1:10

1) I, Bonnie Pettibone, am a Michigan Voter registered at 1933 Downham Dr Wixom

2) I have been serving November 3, 2020 as a Poll Challenger for the Trump for President Campaign Committee + the Michigan Republican Party, at the TCF, Detroit Canvass

3) at approx. 1:10P I observed a ballot being duplicated at AUCB 43 + I approached the supervisor and asked if there was a republican there to witness this duplication? He said he didn't know. The inspectors continued to duplicate the ballot.

signed by: Bonnie Pettibone Printed name:

date 11-3-20

Bonnie Pettibone

Susan L. Mills, Public Notary

Susan L. Mills

exp. October 27, 2025

David

Piontak



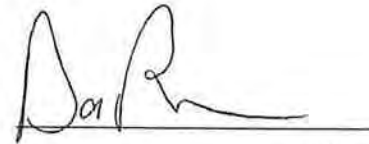
**AFFIDAVIT OF DAVID PIONTEK**

David, being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. I am a registered voter in the State of Michigan, in the city of Livonia.
3. I was a Republican Poll Challenger on November 4, 2020 at the TCF Center in Detroit Michigan.
4. I began observing at approximately 10:30 am at table 51.
5. There was a bin marked "problem ballots" and I asked the table captain where those ballots were going. The table captain stated those ballots were going to be further looked at. I asked if I could get the numbers of those ballots, and the table captain stated that he would only allow me to get the number of the top ballots, because he wasn't going to allow me to slow the process down. I followed the "problem ballots" and observed a poll worker drop them on the central processing table with no supervision.
6. The table captain, George, stated there were 32 "problem ballots." I stated that I wanted to challenge those ballots that they refused to allow me to inspect. I further stated that I would like the challenged ballots to be recorded in the poll back, but George refused and said "we will put it in the computer."
7. I proceeded to write an incident report and handed it off to the Michigan Republican Party at the TCF Center.
8. After a lengthy break, the poll workers returned to begin counting the overseas military absentee ballots.

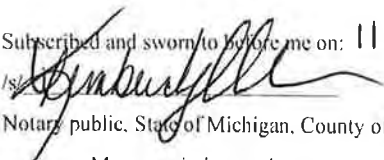
- 9. On two separate occasions, I witnessed a poll worker make a mistake while duplicating a ballot. The poll worker set the invalid ballots aside. The table captain George brought two new ballot and the poll workers began duplicating the ballots, but did not properly secure the two spoiled ones. I repeatedly asked where those spoiled ballots would go, and George had no answer.
- 10. At approximately 7:52 pm, the problem ballots that were sent to the central processing table came back to table 51, where I was a poll challenger. The poll worker began scanning a problem ballot and a computer prompt with the words "unlisted person" came up. I witnessed the poll worker manually enter six of these ballots into the system and assign each one a fictitious birth date of 01-01-1900. Since, the poll workers were moving so quickly, I was able to capture just one name, " \_\_\_\_\_ ." Her ballot number was 5430.
- 11. Throughout the day, I witnessed a pattern of intimidation, secrecy, and hostility by the poll workers. Poll workers would cheer, jeer and clap when poll challengers were escorted out of the TCF Center. There seemed to be collaboration between the democratic poll challengers and the City of Detroit poll workers.

12. Dated: November 7, 2020  
8 02P



David Piontek



Subscribed and sworn to before me on: 11/8/20  
/s/   
Notary public, State of Michigan, County of:  
My commission expires:

**Kimberly A. Moin**  
**NOTARY PUBLIC - STATE OF MICHIGAN**  
**County of Wayne**  
**My Commission Expires 10/23/2024**  
**Acting in the County of \_\_\_\_\_**

Terry

Poplawski

**AFFIDAVIT OF TERRY POPLAWSKI**

TERRY POPLAWSKI being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. I am a registered voter in the State of Michigan.
3. At TCF on Wednesday arrived at approx. 12:00 pm as poll challenger. I was prohibited from entry to the counting floor. Told to wait as they were already over capacity. Kept door closed. Waited until approx. 4:45 pm when returned home.

Dated: November 8, 2020

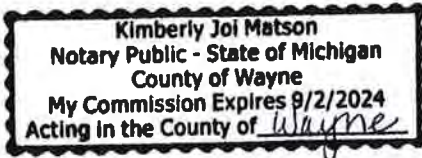
*Terry L. Poplawski*

TERRY POPLAWSKI

248 661-5141 *Terry L. Poplawski*

Subscribed and sworn to before me on: *11/8/2020*  
*Kimberly J. Matson*  
 Notary public, State of Michigan, County of: *Wayne*  
 My commission expires:  
*9/2/2024*

*11/8/20*



Kline

Preston

**IN RE: PRESIDENTIAL ELECTION  
NOVEMBER 3-4, 2020  
DETROIT, MICHIGAN**

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**I hereby depose and testify under penalty of perjury as follows:**

1. That I was an attorney for the GOP in Michigan on November 3-4, 2020.
2. That I am competent to testify based on my personal knowledge, experience and observations.
3. That my testimony is true.
4. That I am an attorney and I am licensed in the State of Tennessee and I have been continuously licensed in Tennessee since 1995. That I am also licensed in the United States Supreme Court, Sixth Circuit of Appeals, United States District Courts for the Northern and Southern Districts of Illinois, United States District Court for the Eastern District of Michigan, United States District Court for the Northern District of Indiana, United States District Court for the Southern District of Ohio, United States District Court for the Eastern District of Wisconsin, United States District Courts for the Middle and Western Districts of Tennessee, United States District Court for Nevada, United States District Court for Arizona, United States District Court for Nebraska, United States District Court for the Western District of Kentucky, and by the Association of Russian Jurists.
5. That my legal experience includes having written fourteen (14) books on various subjects of the law including the following: *In Re: The December 4, 2011 Parliamentary Elections Of The Russian Federation, The Law on*

*Copyright of the Russian Federation, The Copyright Legislation of the Russian Federation (2011), Reporter of All Russian Appellate Copyright Cases, Volumes I-IV, The Civil Code of the Russian Federation, Volumes I-IV, The Art of Gittin' Paid, and The Law on Advertising of the Russian Federation.*

6. That I was present on November 4, 2020 at TCF Center in Detroit, Michigan as an attorney for the GOP and observed processing of ballots at the Detroit Department of Elections Central Counting Boards for the majority of the day and into the evening.
7. That I worked with Jason R. Humes who was the leader of the MI-GOP floor team that day.
8. That at approximately 7:00 p.m. on November 4, 2020, it was brought to my attention by various poll challengers who personally observed that there were problem ballots that were not in the poll books that were being moved between the elevated restricted area to the center table which was not accessible to any poll challengers. The elevated restricted area contained approximately twenty (20) computers and twenty (20) Detroit Department of Elections employees who had no oversight by poll challengers. They were located on an elevated stage and their computers were well above eyesight.
9. That Jason R. Humes effectively challenged all of these problem ballots and requested that they be sequestered in order to preserve and record his timely, well-stated challenge to these ballots. He made this request to

Messrs. Daniel Baxter and Chris Thomas. Mr. Humes explained the challenge in detail as set forth in his sworn statement dated November 10, 2020.


10. That Mr. Humes challenged the problem ballots on the following bases:

1. **After the problem ballots were removed from each AB on Tuesday and Wednesday, we were denied all access to observe the ballots including how they resolved each ballot issue;**
2. **Ballots were not in the electronic poll book or supplemental printed poll book before the ballots were opened;**
3. **The ballots were all open and removed to an area with no access to observe;**
4. **Signature verification could not be assured given access to the absentee voter application was not available at TCF.**

11. That the entire set-up of the administration and calculation of ballots on November 4, 2020 at the Detroit Department of Elections in the TCF Center was improper because a central part of their procedure was hidden and obscured in plain sight by the raised stage on which unknown functions were performed involving ballots which were not subject to observation, review, scrutiny or challenge.



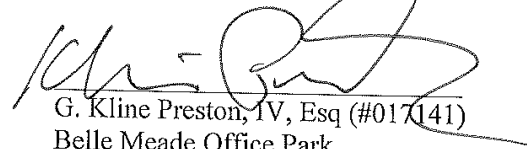
RECEIVED by MSC 11/26/2020 2:44:13 AM

  
G. Kline Preston, IV, Esq.

11/10/20  
Date

Respectfully submitted,

**KLINE PRESTON LAW GROUP**



G. Kline Preston, IV, Esq (#017141)  
Belle Meade Office Park  
4515 Harding Pike, Suite 107  
Nashville, TN 37205  
Tel: 615-279-1619  
Fax: 866-610-9565  
[kpreston@klineprestonlaw.com](mailto:kpreston@klineprestonlaw.com)

Christopher

Schornak

**AFFIDAVIT OF CHRISTOPHER SCHORNAK**

Christopher Schornak, being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. I am a registered voter in the State of Michigan.
3. I went to the TCF Center in Detroit to be a poll challenger, Election Integrity Fund, Non Partisan Participant on November 4, 2020. I arrived at approximately 10:30am.
4. At each counting board, the poll workers attempted to block me from observing. I was verbally abused and intimidated by not only the Democratic poll challengers but the ACLU and other organizations.
5. I primarily attempted to observe counting board 88 and 89.
6. I observed ballots that were not in the electronic log or the paper poll log. These would be considered spoiled ballots . I observed these ballots be counted.
7. I observed a poll worker attempt to match the voter to the paper log. When she was unable to make the match, she would put the spoiled ballots into a separate pile and go away from the counting board for a while. She would return approximately 20-30 minutes later and return the spoiled ballots to the pile of ballots to be counted.
8. I observed this same poll worker do this same process over many tables and over many hours.
9. I attempted to challenge these ballots to a supervisor and was told "We are not talking to you, you cannot challenge this".

10. I went back and spoke to the attorney of the Election Integrity Fund and was instructed to challenge. After much opposition, I was finally able to log challenges.
11. Ballot #7909 was reassigned to Ballot #0976 at counting board 88 @ 11:35 am, the ballot number did not match the electronic record. The voter's name was
12. Another poll challenger Abbie Heilmanen also observed this challenge.
13. Ballot # 5748, reassigned to ballot #505 Board #89, the ballot number did not match the ballot book or electronic record. The voter's name was
14. Another poll challenger Abbie Heilmanen also observed this challenge.
15. I attempted to make other challenges but was denied access to ballot numbers or names.
16. There was a stack of at least 40 ballots that could not be authenticated with the ballot book or electronic record, but was told they would not be challenged because they just had to be counted.
17. This was similar amongst the eight tables that I observed.
18. I observed that the military ballot duplication process was only performed by two Democrats rather than one Democrat and one Republican.
19. I also observed that none of the poll workers had any identification as to their name or party affiliation as required by regulation. I asked if there were any Republicans present and was told "no".

20. When I asked for the number of ballots that had been counted or processed at each counting board, I was denied information. I was told I had to get it online. I requested a print out and was told to access it online. Therefore, I was unable to get a total vote count from each counting board.

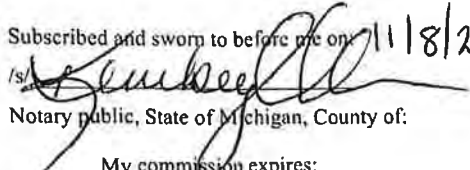
Dated: November 8, 2020



Christopher Schornak

Subscribed and sworn to before me on 11/18/20

/s/

  
Notary public, State of Michigan, County of:

My commission expires:

Kimberly A. Moin  
NOTARY PUBLIC - STATE OF MICHIGAN  
County of Wayne  
My Commission Expires 10/23/2024  
Acting in the County of \_\_\_\_\_



Alexandra

Seely

Alexandra Seely, being Sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if Sworn as a witness, am competent to testify to them as well.

2. I am a registered voter in the State of Michigan

3. I was a ~~vote~~ <sup>Poll</sup> challenger for Wayne County MI at TCF Center on November 4<sup>th</sup> 2020, ~~at~~ from 10am - 3:30pm

4. I challenged 10 votes at table 23, they would not take out the log to record my challenges. I had to write names and ballot numbers on my own.

5. I ~~requested~~ <sup>asked</sup> to make incident reports they would not allow me and said they will make a note in the computer, they did not and proceeded to keep counting

6. I was harassed and threatened to be thrown out multiple times. Accused of taking photos when I never did and told I would be thrown out. No one had name tag except GOP challengers.

7. They told everyone to go to lunch if they haven't ate. Only the ballot centers could stay in the room to eat. Challengers and others had to leave the room to eat. Then they would not allow them back in and said they were at max capacity. Prior to this the room was packed after it was almost less than half.

8. After they ejected them it was half full

8. They wouldn't let anyone in for almost 2 hours after.

1 of 4

9. People started to notice and become upset. They were banging off the <sup>windows</sup> ~~doors~~ and doors. Then trump <sup>resident</sup> released the ~~law suit~~ <sup>Statement</sup> and they covered up the windows and doors.
10. I had 6 ballots that were sent to the wrong precinct. They made duplicate ballots on spot and had everyone witness then took the originals to go to the correct "precinct".
11. 5 ballots wouldn't scan into the computer and the officiator said to keep scanning them then took them from the table I don't know where they went from there. They also would not put them in the spoiled <sup>ballot bin</sup>.
12. They wouldn't let any other GOP people near the table to be an observer of my challenges. They would threaten to throw me and GOP lawyers out that would come up to me to ask how I was doing.
13. I was called a bigot and a cunt. She covered her <sup>name tag</sup>.
14. There was backpacks and suitcases that were saran wrapped. In the back of the <sup>counting</sup> room over by escalators.
15. The ballot numbers did not match the envelope ballot number I would challenge they would not record it or allow me to make an incident report they would put a piece of tape over the ballot number attached to ballot and write the number on <sup>envelope</sup> ~~envelope~~. Then would count it. I would get yelled at for challenging and saying I can't speak out. Then they would try to hide the ballot numbers



from me. I had a man scream in my face to back up and be 6ft away when I already was or he'd throw me out.

16. Two GOP lawyers were thrown out trying to help me and they said because they weren't wearing masks ~~correctly~~ correctly.

17. Before I started challenging at my table there was a man who took a photo of the monitor with the birthdays 1/1/1900. They ejected him after and would not document his challenges. Everyone was cheering and yelling. I personally witnessed this <sup>including</sup> ~~the picture~~.

18. I was ~~the~~ trying to leave at 3:30 pm because I had to be at work by 4. They locked us in, had the windows all covered and my table at that moment in time said they had 5,000 votes left to count and no one in the room had started military votes yet. Fifteen minutes later they called for Joe Biden winning Michigan.

19. They made all GOP challengers wear their credentials on a long, narrow white piece of paper when democrats' challengers only had a <sup>small</sup> lime green circle sticker. Then democrats pretended to be GOP so there would be less GOP and more democrats. It was visible that there was people with more green circle stickers than white lanyards.

20. In reference to #14 I was standing with my father and my father asked a security guard

About the Saran wrapped bags and the Security guard said Dont worry about it and that we needed to walk away. My dad asked again what are those? Security guard said if we did not walk away he would call the police over to arrest us.

21. I had a persons ~~bag~~ ~~whose~~ had two different ballots and they counted both would not let me document. They said they documented in the computer

22. There was covers, backpacks, duffle bags every where even at the counting tables.

23. When the military ballots came in they came through back double doors at the counting room then I left the room. They were <sup>packing in boxes</sup> squared ~~shipped~~ ~~bags~~

~~with~~ with an open top on wheels and navy color. They did not match suitcases in the back but unsure if they were pulled from there

24. When ~~the~~ people were trying to leave they tried to make us go out a different door & not sign the book to signat by the main door. I signed the signout book and when I exited the main doors and people were screaming and asking me questions & cameras in my face.

X Alexandra Seely <sup>NOV 8/2020</sup>  
Alexandra Seely  
Print

Barbara Harrell  
Notary Public

BARBARA A. HARRELL  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF OAKLAND  
MY COMMISSION EXPIRES Aug 4, 2025  
ACTING IN COUNTY OF Wayne

Ulrike

Sherer

**AFFIDAVIT OF ULRIKE SHERER**

Ulrike Sherer, being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. I am a registered voter in the State of Michigan.
3. I was a Republican Poll Challenger on November 3, and November 4, 2020.
4. On November 3, 2020 I was observing at TCF Center in Detroit Michigan.
5. I began observing @ 7:00 am on November 3, 2020
6. I observed several irregularities.
7. There was no signature comparison being conducted on absentee ballots. There were stacks of ballots in “post office” bins in their envelopes, on tables identified by precinct number.
8. The person that was at the e-poll computer would scan the envelope and pass it to another person who separated the envelope from the secrecy envelope that contained the ballot.
9. The next person would take the ballot out, roll it to flatten it, tear off the perforated stub with the ballot number and then put the ballot into a box identified as the “tabulation box” that was then taken to a tabulator. The tables had 5 poll workers at each table. Each poll worker was supposed to have a separate job in the verification process. This did not happen. Each of the 5 poll workers just opened the ballots and put them in the tabulation box.
10. The first ballot I observed was scanned, but had no corresponding name on the data base, but he had a voter number. However, his date of birth was 1921 but he registered

to vote in 1900. When I challenged the ballot, the poll worker said it does not matter. When I asked the supervisor, the supervisor refused to take action. I then wanted to fill out an incident report and requested a ballot number and name and the supervisor refused me the information and told me “we don’t do that here”.

11. The next ballot I observed was allegedly the wife of the previous voter born 1924, registered to vote in 1900. Same denied process to challenge. They flipped the ballots over so I was unable to retrieve the information for my challenge report.
12. A poll worker told me that they had ballots on Tuesday that they had “partially processed on Monday”. With these repeat ballots, they were divvied up amongst poll workers, they each individually processed the ballots without going through the 5 step process that each ballot was supposed to be confirmed. Therefore, the separation of the ballot envelope and the ballot number eliminated any traceability.
13. Specifically, there was no post mark verification; there was no ballot review for stray marks; there was no verification of the voter existing in the data base; there was no signature comparison or authentication.
14. These non-verified ballots were then placed in a box and then a separate worker took the box to the tabulator, without any review.
15. As a challenger I was prohibited from observing the postmarks.
16. As a challenger I was prohibited from observing the ballot duplication process by poll workers moving in front of me to block me from watching the duplication process. During duplication the poll workers duplicating the ballots hovered over the ballots blocking observation.

17. Once the duplicate was made, they deposited the original into an envelope and we were not able to see what happened to the envelope. Upon inquiry as to the disposition of the originals, it was clear that too much inquiry would result into dismissal from the site.
18. On November 4, 2020, I returned to TCF at 6:30am.
19. I observed incomplete and inconsistent E-poll documentation.
20. The E-poll system allowed ballot acceptance even when date of birth and/or voter registration dates were suspect.
21. Ballots were processed on November 4, 2020 without being verified as being in E-poll or the absentee voter list. It can be observed that these ballots were sequential, highly suggestive of fraud.
22. I also experienced attempts at intimidation. When the voting stopped, Republican poll watchers arrived and the poll workers blocked the windows so it could not be seen what was occurring inside. We were also told we could not speak to press.
23. The newly arrived poll workers called us on the phone informing us that they were present, but were barricaded onto the roof and being denied entry. When I attempted to inquire about their entry, I was told they were “rioters”
24. Other forms of intimidation were body blocking, deprivation of chairs to sit in. Then when Republican poll challengers left to get food or drink, they were denied re-entry. I was also told a SWAT team was there to make sure we did not “argue too much”.

25. Dated: November 7, 2020

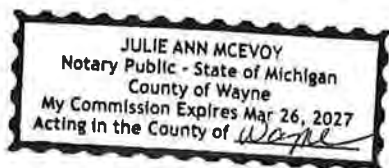
  
ULRIKE SHERER  
Ulrike Sherer

Subscribed and sworn to before me on:

/s/ *Julie Ann Mcevoy* 11-8-2020

Notary public, State of Michigan, County of:

My commission expires:



Jennifer  
(unavailable)

Seidl



Andrew

Sitto

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

---

CHERYL A. COSTANTINO and EDWARD P.  
McCALL, Jr.,

Plaintiff,

AFFIDAVIT OF ANDREW  
SITTO

-vs-

CITY OF DETROIT; DETROIT ELECTION  
COMMISSION; JANICE M. WINFREY, in  
her official capacity as the CLERK OF THE  
CITY OF DETROIT and the Chairperson of  
the DETROIT ELECTION COMMISSION;  
CATHY M. GARRETT, in her official  
capacity as the CLERK OF WAYNE  
COUNTY; and the WAYNE COUNTY  
BOARD OF CANVASSERS,

Defendants.

---

FILE NO: 20-\_\_\_\_\_ -AW

JUDGE

David A. Kallman (P34200)  
Erin E. Mersino (P70886)  
Jack C. Jordan (P46551)  
Stephen P. Kallman (P75622)

GREAT LAKES JUSTICE CENTER  
Attorneys for Plaintiff  
5600 W. Mount Hope Hwy.  
Lansing, MI 48917  
(517) 322-3207/Fax: (517) 322-3208

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AFFIDAVIT

The Affiant, Andrew Sitto, being first duly sworn, hereby deposes and states as follows:

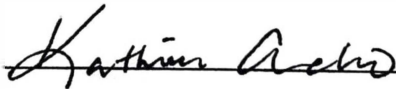
1. My name is Andrew Sitto and I was a poll challenger for the November 3, 2020 election.
2. I arrived at the TCF Center at 9:30 p.m. on November 3, 2020.
3. I reported to the counting room, which is a large room on the main floor of the TCF Center. The room is about 100 yards long and about 50 yards wide with windows.

4. The poll challengers watch the counters who were sitting at tables comparing paper ballots to Michigan electronic poll book or registered voter list (sometimes called the QVF) on computer screens. Each counter compares the ballot to an electronic database on his/her computer to determine if the ballot correlates to a person who is registered to vote.
5. I was standing in the center of the room where there were replacement or duplicate ballots for damaged ballots. I remained in this location from about 10:00 p.m. until about 4:30 a.m. If a counter needed a duplicate ballot, they would come to this central location to take a duplicate ballot.
6. At approximately 4:30 a.m., I thought everyone was going to go home as our shift had ended.
7. There were two men in charge of the counting, one in his 30s and one in his 50s.
8. At approximately 4:30 a.m., on November 4, 2020, the man in his 50s got on the microphone and stated that another shipment of absentee ballots would be arriving and would have to be counted.
9. I heard other challengers say that several vehicles with out-of-state license plates pulled up to the TCF Center a little before 4:30 a.m. and unloaded boxes of ballots.
10. At approximately 4:30 a.m., tens of thousands of ballots were brought in and placed on eight long tables. Unlike the other ballots, these boxes were brought in from the rear of the room.
11. The same procedure was performed on the ballots that arrived at approximately 4:30 a.m., but I specifically noticed that every ballot I observed was cast for Joe Biden.
12. While counting these new ballots, I heard counters say at least five or six times that all five or six ballots were for Joe Biden. All ballots sampled that I heard and observed were for Joe Biden.
13. There was a shift change at 5:00 a.m. for the poll challengers. Many challengers decided to leave at the 5:00 a.m. shift change. I decided not to leave and continued to monitor the ballot counting.
14. Upon information and belief, the TCF Center was the only place where absentee ballots were being counted.

- 14. Upon information and belief, the TCF Center was the only place where absentee ballots were being counted.
- 15. I filled out about six or seven incident reports about what occurred at the TCF Center.
- 16. At approximately 2:00 p.m. on November 4, 2020, election officials covered windows to the counting room with cardboard to block the view.
- 17. A little after 2:00 p.m., I exited the glass enclosed room to take a break in the lobby area of the TCF Center. When I tried to go back into the counting room, security guards refused to allow me back in to monitor the counting
- 18. Previously, people could come and go freely into the counting room.
- 19. The above information is true to the best of my information, knowledge, and belief.
- 20. Further affiant says not.

  
 \_\_\_\_\_  
 Andrew Sitto

On this 7th day of November, 2020, before me personally appeared Andrew Sitto, who in my presence did execute the foregoing affidavit, and who, being duly sworn, deposes and states that he has read the foregoing affidavit by him subscribed and knows the contents thereof, and that the same is true of his own knowledge and belief, except as to those matters he states to be on information and belief, and as to those matters he believes them to be true.

  
 \_\_\_\_\_  
 Notary Public, Macomb County,  
 My Commission Expires: 7/1/2027

Michigan



Great Lakes Justice Center

Emily

Steffans

**AFFIDAVIT OF EMILY A. STEFFANS**

EMILY A. STEFFANS, being sworn, declares under penalty of perjury:

1. I am personally familiar with the facts stated in this Affidavit and, if sworn as a witness, am competent to testify to them as well.
2. I am a registered voter in the State of Michigan.
3. On November 4, 2020, I volunteered as a poll challenger for the GOP.
4. I arrived at the TCF convention center between 8 and 8:30 am.
5. After a temperature check at the entrance, I was given directions to room 260 which is the room where GOP volunteers went to become credentialed as a challenger.
6. After about 20 minutes of training I received my credentials and paperwork and wristband for entry.
7. I entered the ABC board room.
8. A gentleman with the GOP walked me around the room and explained the process and what to look for.
9. There were not enough GOP volunteers present to have one at each table.
10. I went table to table witnessing the process.
11. I was told during my training that only one volunteer per party was allowed to observe a table at any given time.
12. In many instances there were more than one democrat volunteer challenger at a table.
13. When I moved from table to table I was followed by two to three democrat volunteers.
14. I know they were democrat volunteers because they had green dot stickers on their clothing.
15. Within the first hour I observed poll workers duplicate a ballot.

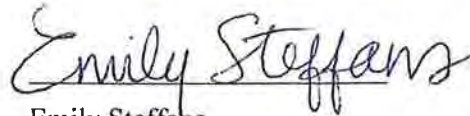
16. During the process two workers used their bodies to block seeing the duplication process.
17. On numerous occasions I was told by poll workers that I needed to stay six feet from them. When I asked if I could come closer because I could not see the screen to verify whether the voter and ballot numbers matched I was told I could not.
18. On numerous occasions, I was told I could only stand at the screen while democrat observers were permitted to move freely around the table.
19. When I asked a question about why a ballot was being placed in a particular box I was told I was not allowed to talk to the poll worker and did not receive an answer.
20. Democrat volunteers were verbally aggressive with me.
21. I was accused by a democrat volunteer of being part of a "cult" for my support of Trump.
22. I witnessed this individual putting large pieces of cardboard over the window so people trying to get in could not see what was happening on the inside where I was.
23. I observed a republican contender being prevented from watching during a duplication. He tried to get closer to the table and move around so he could see, but when he did, three people swarmed him to block his view. The table leader told him to move back and that he was close enough. He said repeatedly that he needed to see the duplication but they would not let him. A man with an election watcher badge told the poll workers they needed to let him see it and the poll workers responded by telling the man with the badge that he needed to go away.
24. A worker arrived at the table and joined the group of people pushing the GOP challenger back. At that point, I intervened and said to the poll workers that they

needed to let the GOP challenger see the duplication. In response, that worker went and got the police. When he returned with them he said I needed to stop talking and that if I did not I would be escorted out.

25. At that point I had watched two GOP people escorted out by the police. When they were escorted out democrat volunteers and poll workers at the table cheered.

26. This made me afraid to further pursue the issue with the duplication any further and to challenge any ballots.

Dated: November 7, 2020

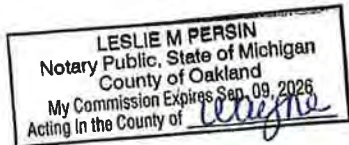
  
Emily Steffans

Subscribed and sworn to before me on:

/s/ Leslie M Persin

Notary public, State of Michigan, County of:

My commission expires: 9-9-2026





Christopher

Thomas



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STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

CHERYL A. COSTANTINO and,  
EDWARD P. MCCALL, JR.,

Case No. 20-014780-AW

Plaintiffs,

Hon. Timothy M. Kenny

vs.

CITY OF DETROIT; DETROIT ELECTION  
COMMISSION; JANICE WINFREY, in her official  
capacity as the CLERK OF THE CITY and the  
Chairperson of the DETROIT ELECTION COMMISSION;  
CATHY M. GARRETT, in her official capacity as the  
CLERK OF WAYNE COUNTY; and the WAYNE COUNTY  
BOARD OF CANVASSERS,

Defendants.

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Being duly sworn, Christopher Thomas, deposes and states the following as true, under oath:

1. I am a Senior Advisor to Detroit City Clerk Janice Winfrey beginning on September 3, 2020 until December 12, 2020. In this capacity I advise the Clerk and management staff on election law procedures, implementation of recently enacted legislation, revamped absent voter counting board, satellite offices and drop boxes, Bureau of Election matters and general preparation for the November 3, 2020 General Election.

2. I served in the Secretary of State Bureau of Election for 40 years beginning in May 1977 and finishing in June 2017. In June 1981 I was appointed Director of Elections and in that capacity implemented four Secretaries of State election administration, campaign finance and lobbyist disclosure programs.

3. In 2013, I was appointed to President Barack Obama's Commission on Election Administration and served until a final report was submitted to the President and Vice-President in January 2014.

4. I am a founding member of the National Association of State Election Directors and served as its president in 1997 and 2013.

5. On November 2, 3 and 4, 2020, I worked at the TCF Center absent voter counting boards primarily as liaison with challenger parties and organizations. I provided answers to questions about processes at the counting board tables, resolved disputed about process and directed leadership of each organization or party to adhere to Michigan Election Law and Secretary of State procedures concerning the rights and responsibilities of challengers. I have reviewed the complaint and affidavits in this case.



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6. It is clear from the affidavits attached to the Complaint that these challengers do not understand absent voter ballot processing and tabulating. It is clear also that they did not operate through the leadership of their challenger party, because the issues they bring forward were by and large discussed and resolved with the leadership of their challenger party. The leadership on numerous occasions would ask me to accompany them to a particular counting board table to resolve an issue. I would always discuss the issue with counting board inspectors and their supervisors and the challengers. The affiants appear to have failed to follow this protocol established in a meeting with challenger organizations and parties on Thursday, October 29, 2020 at the TCF Center where a walk-through of the entire process was provided. A few basics are in order: The Qualified Voter File (QVF) is a statewide vote registration file and was not available to counting boards. E-pollbook (EPB) is a computer program used in election day precincts to create the poll list of voters casting ballots. Supplemental poll lists contain names of voters who cast an absent voter ballot on Sunday, Monday and Tuesday. At the processing tables no ballots are scanned. A poll list is not used to confirm whether any specific voter's ballot is counted.

7. To increase the accuracy of the poll list, the Detroit Department of Elections employed the Secretary of State e-pollbook (EPB) to assist in creating the poll list. For each of the counting boards, the EPB held all the names of voters who requested and returned an absent voter ballot by mid-afternoon Sunday, November 1. The download on Sunday was necessary to prepare for the pre-processing granted by a recently enacted law that allows larger municipalities to process ballots, but not to tabulate them, for 10 hours on Monday. (To clarify some apparent confusion by Plaintiffs, Wayne County does not tabulate City of Detroit absent voter ballots.)

8. Absent voter ballots received Sunday after the download to EPB, all day Monday until 4 p.m. and Tuesday by 8 p.m. were not in the EPB. They would be added either by manually



entering the voter names into the EPB or on supplemental paper poll lists printed from the Qualified Voter File (QVF).

9. Zachery Larsen is raising an issue about return ballot envelopes where the barcode on the label would not scan and the voter's name was not on the supplemental list. He was observing the correction of clerical errors, not some type of fraud. In every election, clerical errors result in voters being left off the poll list, whether it is a paper poll list or the EPB. These errors are corrected so that voters are not disenfranchised. Michigan law ensures that voters are not disenfranchised by clerical errors.

10. On Wednesday, November 4 it was discovered that the envelopes for some ballots that had been received prior to November 3 at 8 p.m., had not been received in the QVF. They would not scan into the EPB and were not on the supplemental paper list. Upon reviewing the voters' files in the QVF, Department of Elections staff found that the final step of processing receipt of the ballots was not taken by the satellite office employees. The last step necessary to receive a ballot envelope requires the satellite employee to enter the date stamped on the envelope and select the "save" button. They failed to select "save".

11. A team of workers was directed to correct those clerical errors by entering the date the ballots were received in the satellite office and selecting "save". This action then placed the voter into the Absent Voter Poll List in the QVF so that the ballot could be processed and counted. None of these ballots were received after 8 p.m. on election day. Most were received on Monday, November 2<sup>nd</sup> – the busiest day for the satellite offices.

12. The return ballot envelopes for each of these voters are marked with the date received and initialed by satellite employees who verified the voter signatures. By entering the date on which the ballot was received, no QVF data was altered. The date field was empty because





the satellite workers did not select 'save', thus failing to complete the transaction. The "backdating" allegation is that on November 4 the staff entered the correct dates the ballots were received – all dates were November 3 or earlier. The date of receipt was not backdated.

13. These return ballot envelopes were discussed with several Republican challengers. Two challengers were provided a demonstration of the QVF process to show them how the error occurred, and they chose not to file a challenge to the individual ballots.

14. The inspectors at the counting boards were able to manually enter voters into the EPB. The return ballot envelope could easily be observed and every key stroke of the EPB laptop operator was clearly visible on the large screen at one corner of the table. The Department of Elections, at some expense, provided large monitors (see attached photo) to keep the inspectors safe and provide the challengers with a view of what was being entered, without crossing the 6-foot distancing barrier. Instead of creating problems for challengers, the monitors made observing the process very transparent.

15. The EPB has an "Unlisted Tab" that allows inspectors to add the names of voters not listed. The EPB is designed primarily for use in election day polling places and reserves the Unlisted Tab to enter voters casting provisional ballots. In polling places, voters are verified by providing their date of birth. Consequently, the EPB is designed with a birthdate field that must be completed to move to the next step. When using this software in an absent voter counting board, a birthdate is not necessary to verify voters, as these voters are verified by signature comparisons (a process which was completed before the ballots were delivered to the TCF Center). Inspectors at the TCF Center did not have access to voters' birthdates. Therefore, due to the fact that the software (but not the law or the Secretary of State) requires the field be completed to move to the next step, 1/1/1900 was used as a placeholder. This is standard operating procedure and a standard date used



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by the State Bureau of Elections and election officials across the state to flag records requiring attention. The date of 1/1/1900 is recommended by the Michigan Secretary of State for instances in which a placeholder date is needed.

16. When Republican challengers questioned the use of the 1/1/1900 date on several occasions, I explained the process to them. The challengers understood the explanation and, realizing that what they observed was actually a best practice, chose not to raise any challenges.

17. Ballots are delivered to the TCF Center after they are processed at the Department of Elections main office on West Grand Boulevard. On election day, ballots are received from the post office and the satellite offices. It takes several hours to properly process ballots received on election day. It appears that some of the affidavits submitted by Plaintiffs are repeating false hearsay about ballots being delivered, when actually television reporters were bringing in wagons of audio-video equipment. All ballots were delivered the same way— from the back of the TCF Hall E.

18. Early in the morning on Wednesday, November 4, approximately 16,000 ballots were delivered in a white van used by the city. There were 45 covered trays containing approximately 350 ballots each. The ballots were not visible as the trays had a sleeve that covered the ballots.

19. The ballots delivered to the TCF Center had been verified by the City Clerk's staff prior to delivery in a process prescribed by Michigan law. Thus, when Jessy Jacob complains that she "was instructed not to look at any of the signatures on the absentee ballots, and I was instructed not to compare the signature on the absentee ballot with the signature on file" it was because that part of the process had already been completed by the City Clerk's Office in compliance with the statutory scheme.





20. It would have been impossible for any election worker at the TCF Center to count or process a ballot for someone who was not an eligible voter or whose ballot was not received by the 8:00 p.m. deadline on November 3, 2020. No ballot could have been “backdated,” because no ballots received after 8:00 p.m. on November 3, 2020 were ever at the TCF Center. No voter not in the QVF or in the “Supplemental Sheets” could have been processed, or “assigned” to a “random name” because no ballot from a voter not in one of the two tracking systems, was brought to the TCF Center.

21. Mr. Larsen complains he was not given a full opportunity to stand immediately behind or next to an election inspector. As stated, monitors were set up for this purpose. Moreover, election inspection were instructed to follow the same procedure for all challengers. The Detroit Health Code and safety during a pandemic required maintaining at least 6-feet of separation. This was relaxed where necessary for a challenger to lean in to observe something and then lean back out to return to the 6-foot distancing. The inspectors could see and copy the names of each person being entered into the e-pollbook. If an inspector did not fully accommodate a challenger’s reasonable request and the issue was brought to the attention of a supervisor, it was remedied. Announcements were made over the public address system to inform all inspectors of the rules. If what Mr. Larsen says is accurate, any inconvenience to him was temporary, had no effect on the processing of ballots, and certainly was not a common experience for challengers.

22. Jessy Jacob alleges she was instructed by her supervisor to adjust the mailing date of absentee ballot packages being sent out to voters in September 2020. The mailing date recorded for absentee ballot packages would have no impact on the rights of the voters and no effect on the processing and counting of absentee votes.







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voters who registered to vote on those days, but the vast majority are voters who applied for and voted an absent voter ballot.

29. Plaintiffs use “QVF” in place of “EPB”. The QVF is a statewide voter registration file; an EPB for a counting board is a file of the voters who applied for and returned an absent voter ballot for that counting board.

30. There is no “election rule” requiring all absent voter ballots be recorded in the QVF by 9:00 p.m. on November 3, 2020.

31. Plaintiffs also misunderstand the process when they state ballots were “filled out by hand and duplicated on site.” Instead, ballots were duplicated according to Michigan law. Michigan election law does not call for partisan challengers to be present when a ballot is duplicated; instead, when a ballot is duplicated as a result of a “false read,” the duplication is overseen by one Republican and one Democratic inspector coordinating together. That process was followed.

32. Regarding access to TCF Hall E by challengers, there is also much misinformation contained in the statements of challengers. Under the procedure issued by the Secretary of State there may only be 1 challenger for each qualified challenger organization at a counting board. Detroit maintains 134 counting board, thus permitting a like number of challengers per organization.

33. In mid-afternoon on Wednesday, I observed that few challengers were stationed at the counting board tables. Rather, clusters of 5, 10 or 15 challengers were gathered in the main aisles at some tables. I conducted a conversation with leaders of the Republican Party and Democratic Party about the number of challengers in the room and their locations. It became clear that more than 134 challengers were present for these organizations. No one was ejected for this





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reason, but access to Hall E was controlled to ensure that challenger organizations had their full complement and did not exceed the ceiling any further than they already had.

34. Challengers were instructed to sign out if they needed to leave Hall E. For a short period of time—a few hours—because there were too many challengers in Hall E for inspectors to safely do their jobs, new challengers were not allowed in until a challenger from their respective organization left the Hall. However, as stated above, each challenger organization, including Republican and Democrat, continued to have their complement of challengers inside of the Hall E.

35. As stated previously, challengers are expected to be at their stations next to a counting board. Unfortunately, this was not the behavior being displayed. Instead, challengers were congregating in large groups standing in the main aisles and blocking Election Inspectors' movement. In one instance, challengers exhibited disorderly behavior by chanting "Stop the Vote." I believed this to be inappropriate threatening of workers trying to do their jobs. Such action is specifically prohibited in Michigan election law. Nevertheless, challengers were permitted to remain.

36. The laptop computers at the counting boards were not connected to the Internet. Some of the computers were used to process absent voter ballot applications in mid-October and were connected to the QVF. On election day and the day after election day, those computers were not connected and no inspector at the tables had QVF credentials that would enable them to access the QVF.

37. The Qualified Voter File has a high level of security and limitation on access to the file. For example, it is not true that a person with QVF credentials in one city is able to access data in another city's file within the QVF. That is not possible.

38. A point of much confusion in these claims is centered on the law that permits a city clerk to verify the signatures on absent voter ballots before election day. Inspectors at absent voter counting boards do not verify the signatures on the return ballot envelopes. Department of Elections staff may use a voter's signature on an application to verify the voter's signature on return ballot envelope. Or the staff may use the voter's signature in the QVF to make the comparison. Often using the QVF is more efficient than the application signatures.

39. I am not aware of any valid challenge being refused or ignored or of any challengers being removed because they were challenging ballots. Ballot challengers are an important part of the democratic process and were fully able to participate in the process at the TCF Center.

40. In conclusion, upon reviewing Plaintiffs' Complaint, Affidavits, and Motion, I can conclude based upon my own knowledge and observation that Plaintiffs' claims are misplaced and that there was no fraud, or even unrectified procedural errors, associated with processing of the absentee ballots for the City of Detroit.

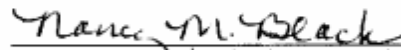
I affirm that the representations above are true.

Further, Affiant sayeth not.

Date: November 11, 2020

  
CHRISTOPHER THOMAS

Subscribed and sworn to before me  
this 11<sup>th</sup> day of NOVEMBER, 2020.

  
Notary Public NANCY M. BLACK  
County of: VAN BUREN, STATE OF MICHIGAN  
My Commission Expires: 09-05-2025  
ACTING IN BERRIEN COUNTY, MICHIGAN



Case 1:20-cv-01083-JTN-PJG ECF No. 31-4, PageID.898 Filed 11/18/20 Page 13 of 13



Rhonda

Weber

(Unavailable)