

AFFIDAVIT OF RANDALL S. CHAMPAGNE

Randall S. Champagne, 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, MI from approximately 6:00am to 1:00pm.
4. I observed unsealed ballots in the TCF center. I was told signatures had been checked the previous day for some ballots. These ballots were in white plastic boxes that were not locked in anyway.
5. I observed ballot tabulating that began at approximately 9:30am.
6. When tabulating began I was asked to stand so far away from the tabulating that it was difficult to properly observe the process. Election workers said covid was the reason for the required distance, but at times I was required to stand over six feet away.
7. Ballots were placed in the tabulating machines and after they had been counted they were placed in white plastic boxes.
8. At one point I observed a machine get jammed. Election workers then reran the box of ballots they had been counting, including what I believe were ballots that had already gone through the machine. Election workers blocked my view of the process so I could not tell if any precautions were taken to prevent ballots from being counted twice. To my knowledge no such precautions were taken.

- 9. Ballots that had been counted and placed in white plastic boxes were left unattended and unsecured. I saw no precautions being taken to make sure these ballots were not counted again.
- 10. I observed other irregularities, but was forced to stand at such a distance that I could not fully observe the process in order to challenge it.
- 11. I did not observe any process for tracking or monitoring the flow or chain of custody of ballots by election workers.
- 12. At approximately 11:30am I observed a coffee stained ballot go through the duplication process. Election workers would not allow challengers to observe the process close enough to properly monitor it.

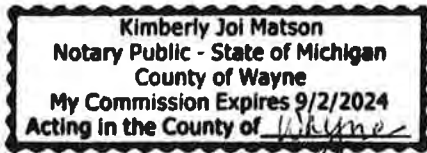
Dated: November 9, 2020



[Print name]

Randall S. Champagne
11/09/2020

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



AFFIDAVIT OF MATT SEELY


Matt 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. On November 4, 2020 I was a Republican challenger at the TCF Center in Detroit, Michigan from approximately 9:00am to 8:00pm.
4. At times, I was harassed and intimidated by others that were present in the counting room who did not have credentials displayed for any organization. They would get in the way to prevent me and other challengers from seeing the processing of ballots; they would interfere with challenges being issued; they would try to distract Republican challengers to make sure they were not able to pay close attention to the processing of ballots.
5. These challengers that did not have credentials displayed made false statements about some of the Republican challengers that resulted in the Republican challengers being removed from the counting board. Specifically, they accused a Republican lawyer of taking his mask off
6. The security team denied access to new Republican challengers to replace the challengers that were leaving the facility unless they signed out. The sign-out process was not explained to any of the challengers before they entered the TCF Center.
7. The Democrat Party set up tables in the TCF Center counting room where they were able to provide food and refreshments to the Democrat Party challengers. There is not supposed to be food or drink allowed in the counting room. This allowed the

Democrat challengers to remain in the room during lunch while the Republican challengers left and were then locked out.

- 8. At one point, the windows to the TCF Center counting room were being covered up to prevent anyone outside the room from being able to see into the counting room.
- 9. Towards the end of the processing, I witnessed election workers entering new people into the system manually with a date of 1/1/1900.
- 10. In the back of the counting room, there was two large pallets with suitcase sized metal cases. Each pallet had shrink wrap around it, but one of the pallets appeared to have had a number of cases removed. When I was looking at these pallets, someone on the security staff told me to leave the area and that if I returned, I would be ejected from the counting board.
- 11. Most of the challengers and the challenges that they tried to make were ignored by the staff overseeing the election process.
- 12. From my observations, the most efficient counting tables could process approximately one hundred ballots an hour. At no time when I was at the TCF Center was every table counting ballots. At most times approximately fifty to one hundred tables were counting ballots. Given these observations, I do not understand how over one hundred thousand ballots could have been counted during the times the TCF Center was used as a counting location.

Dated: November 9, 2020


 [Print name] MATTHEW JAMES SEELY
 11/9/2020

Subscribed and sworn to before me on:

/s/ November 9, 2020

Notary public, State of Michigan, County of:

My commission expires:
07-22-2026



MARGARET LEAR ERLE
 Notary Public, State of Michigan
 County of Wayne
 My Commission Expires 07-22-2026
 Acting in the County of Wayne

AFFIDAVIT OF BRIDGETT LYN ZELASKO

Bridgett Lyn Zelasko, 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 trained online and assigned to be a ballot challenger at the polls at TCF Center. I arrived to the TCF Center on Wednesday, November 4, 2020 at 12:13 p.m. I had received paperwork from the City Clerk to perform this duty.
4. I also received training at the TCF Center to be a ballot challenger as well.
5. When I arrived to the TCF Center, I was waiting in Room 260. Our group was missed a couple of times; however, we ultimately went down to the main entrance of where ballots are around 1:08 p.m.
6. When we attempted to go in, the individuals at the entrance stated that there were no spots available for Republicans but there were fifty-two (52) spots for Non-Partisan.
7. Thereafter, I went back up to change my designation from Republican to Non-Partisan and immediately went back down at approximately 2:05 p.m. By the time I came back down, they indicated no spots were available for Non-Partisan either.
8. At this time, I then watched the people inside put pizza boxes on the windows to impede any outside observers. The police took the pizza boxes down twice while I was there; however, they continued to put the boxes back on the windows.
9. There was a white male, well dressed, who identified himself as the chief legal officer and top lawyer for Detroit. He stated that there were not letting in any more people in to where the ballots were.

- 10. Then the Election Coordinator (black male) then stated if the Republicans did not sign out when they completed their shift, then "too bad, too sad." He additionally stated that they were not going to allow anymore people in due to COVID-10; however, the press continued to go in.
- 11. I ultimately left at 3:45 p.m. and shortly thereafter individuals locked the TCF Center doors to the outside.
- 12. I was denied complete access to perform my ballot challenger role.
- 13. When I attempted to leave by getting on the elevator to the parking structure, there was a man that would not let me on. His refusal to let me in the elevator forced me to access my car by walking the circular ramp up. I finally arrived to my car at 5:15 p.m.

Dated: November 9, 2020

Bridgett Lyn Zelasko
Bridgett Lyn Zelasko

Bridgett Lyn Zelasko
November 9, 2020

Subscribed and sworn to before me on:

/s/ *November 9, 2020*

Notary public, State of Michigan, County of:

My commission expires: *07-22-2026*

MARGARET LEAR ERLE
Notary Public, State of Michigan
County of Wayne
My Commission Expires 07-22-2026
Acting in the County of *Wayne*

Margaret Lear Erle

AFFIDAVIT OF TRACY TOPINI

Tracy Topini, 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 and 4, 2020 I was a Republican Challenger at the TCF Center in Detroit, MI from approximately 10:00pm on November 3 to 5:00am on November 4.
4. I observed Democrat challengers and individuals from an organization called "Election Protection" approach and surrounded Republican challengers in an intimidating and argumentative manner. For every one Republican Challenger I saw four or five others.
5. Many of the Democrat challengers and non-partisan challengers did not wear credentials.
6. I was told by Democrat and non-partisan challengers to stand six feet away from a counting table due to covid, even though they were much closer than six feet to me. This impaired my ability to observe and challenge the ballots.
7. At one point, I spoke in my native language to a friend of mine who was also a Republican challenger.

- 8. A black male challenger who was not wearing credentials approached us and asked us “where were you born; where do you live,” “you both speak the same language and other challengers speak the same language, you must know each other, you are lying.” I believe this was designed to obstruct our ability to observe and challenge. He also put his fingers two to three inches from my face. These actions obstructed my ability to observe and challenge the process.
- 9. At approximately 12:00 to 12:30 I observed two ballots marked for Donald Trump and one marked for Jo Jorgenson at my table and a nearby table.

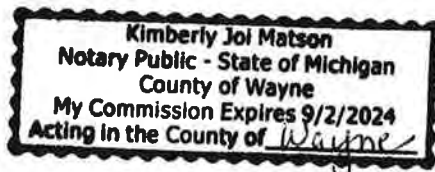
Dated: November 9, 2020

Tracy Topini

 [Print name]

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

Tracy Topini
11-9-2020



AFFIDAVIT OF DEBORAH JEAN FUQUA-FREY

Deborah Jean Fuqua-Frey, 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 arrived at the TCF Center Building around 12:00 p.m.
4. I was not allowed to enter the building where I was to be a Michigan Republican challenger and I did not in fact enter.
5. I witnessed persons who identified themselves as Democrat poll challengers being allowed to enter, and in fact enter the building.
6. I also witnessed people representing special interest groups specifically AFL-CIO, Black Lives Matter with masks on that had it on the mask, Media, and UAW.
7. I repeatedly called out "discrimination" when non-Michigan Republican people were let in by security staff.
8. I remained outside until 8:00 p.m., after which I left without having been able to perform my duty as a Michigan Republican challenger.

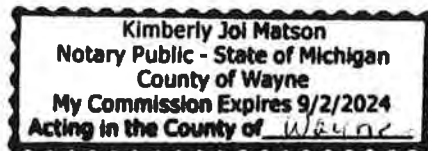
Dated: November 9, 2020

Deborah Jean Fuqua-Frey
 Deborah J. Fuqua-Frey
 11-9-2020

Subscribed and sworn to before me on: 11/9/2020

Kimberly J. Matson
 Notary public, State of Michigan, County of: *Wayne*
 My commission expires:

9/2/2024



AFFIDAVIT OF DANIEL UNGAR

I, Daniel Ungar, 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 went to the TCF Center, Detroit, MI to volunteer with the MI GOP as to the vote counting process in Detroit. I arrived around 12:30 pm and went to Room #260 where a GOP representative informed me that the GOP needed attorneys to supervise and/or answer questions from the GOP poll challengers. I am a licensed attorney in the State of Michigan.
4. I and two other attorneys accompanied the GOP representative down to the ballot counting room. As I was signing in at the ballot counting room, a male election worker who identified himself as the "supervisor" (also may be known as "Jerome") told the Detroit female election worker who was checking me in not to let me or the other two attorneys in as the GOP had too many poll challengers already on the floor. The supervisor also admitted out loud that there were more Democratic poll challengers on the floor than the maximum number allowed and that the Democrats had more poll challengers than the GOP. I did not personally observe this supervisor refusing to allow more Democratic poll challengers in the room but did personally witness the supervisor restricting my entry into the ballot counting room.
5. The supervisor said that the GOP was over its 134 limit of poll challengers. I asked the supervisor how he arrived at the number "134" and he was unable to provide me with

an explanation even though I specifically asked him if the restricted number was related to a “fire code” rule.

6. I personally did not observe any election worker physically counting the number of GOP poll challengers. Even though the GOP representative explained to the election supervisor that the group of individuals he was with were not “poll challengers” but rather lawyers who were there to assist the poll challengers, the supervisor refused to admit us.
7. The election supervisor included supervisory personnel of the GOP in the 134 allotment of partisan poll challengers for the GOP.
8. I then left the ballot counting room and hung out for a while in the building. Around 2:30-3:00 pm I received credentials from the Election Integrity Fund, a non-partisan voter watchdog organization, in one of the hallways upstairs. I then went back downstairs in an attempt to again enter the ballot counting room. At this time, there was a crowd of people outside the ballot counting room and the doors were locked. There was a lot of confusion as to what was happening any why they were not allowing people in. Several minutes later a man came out and announced that he had a statement to make. He introduced himself as Lawrence Garcia, corporation council for the City of Detroit and also an Election Commissioner. He announced to the group of individuals trying to gain access to the ballot counting room that “they are no longer admitting people to the room.”
9. Mr. Garcia introduced the “political organization coordinator” who was the supervisor that had denied me entry earlier (a/k/a Jerome). Jerome announced, “All groups are

above capacity and that no poll challengers are allowed in, including non-partisan poll challengers.”

10. A person from the group shouted out to the supervisor that poll challengers were in fact leaving and that the numbers were coming down. The supervisor responded to the group and said: “We have a book where people sign in. People are supposed to sign out, and if they do not sign out, that is their choice.” He repeated, “If people do not sign out, it is not our fault.”
11. The supervisor’s comment was clearly understood as an admission that he knew there were fewer than the allotted number of poll challengers on the floor because signed-in poll challengers had left the room, and that he was solely relying on poll challengers’ failure to sign out to make a false determination that the number of poll challengers permitted on the floor exceeded the allotted 134.
12. Also, around this time, I observed Detroit election workers attempting to cover the windows that separated the ballot counting room from the lobby outside to prevent those outside the room from seeing what was happening inside.
13. I went back up to Room 260 and I filled out an incident report regarding the City of Detroit election personnel’s refusal to admit poll challengers to the ballot counting room even when they knew that people left without signing out.
14. Around 4pm I went back downstairs to the entrance to the ballot counting room and soon thereafter, an election worker came out of the locked door and announced that they were now going to permit 6 non-partisan poll challengers in the ballot counting room. I was one of the 6 non-partisan poll challengers permitted to sign in, on behalf of the Election Integrity Fund. I signed in at 4:03 pm.

15. During my poll challenger activities, I witnessed the following: I was at the table for Precinct 80 (I believe they were processing military ballots) and noticed that there were two identical envelopes; same address, same handwriting with two names: one was “ [REDACTED] ” and the other one was “ [REDACTED] .” These two names could not be found in the data base and consequently, an election worker decided to enter their names into the data base. Because there was no identifying information as to these two voters, the election worker entered into the data base the birth date of one of the ballots as “November 3, 2020” (the date of the election) and the date of birth entered for the second ballot was “1/1/1900.” A third ballot with the name of “ [REDACTED] ’ was also data supplemented with a birth date of “1/1/1900.”
16. As to the two [REDACTED] ballots, the “ [REDACTED] ” ballot was a single page that did not look like a ballot because it did not have any options for any elected position. It only had write-in spaces for the positions of President, Senator and Representative. I observed this ballot as follows: In the President category, someone had written in “Biden/Harris; in the Senator category someone had written in the word “(Democrat)”; and in the representative category someone had written in the word “(Democrat).” Another election worker then took a blank (real) ballot and filled out that ballot as follows: For President, Biden/Harris was filled in; for Senator, Gary Peters was filled in; for Representative, the Democratic candidate was selected. I raised an objection to the process of tabulating this ballot and my challenge was dismissed.
17. I heard the election workers state that the second ballot ([REDACTED]) did not contain a ballot inside of the envelope. I also personally did not observe a ballot in the envelope. The supervisor in that area then stated that a second ballot should be (and was) filled

out exactly like the first ballot. These ballots were sent off for tabulating. I raised an objection to the process of tabulating this ballot and my challenge was dismissed.

Dated: November 9, 2020



Daniel Ungar

DANIEL UNGAR 11/09/2020

Subscribed and sworn to before me on: 11/9/2020

Kimberly Matson

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

My commission expires:

9/2/2024

