
OFFICE OF THE VICE PRESIDENT

Information Memorandum

TO: VICE PRESIDENT PENCE

FROM: OFFICE OF THE VICE PRESIDENT, LEGAL

SUBJECT: UNLAWFUL ELECTION CONDUCT IN SIX STATES

DATE: JANUARY 1, 2021

In six swing states—Arizona, Georgia, Michigan, Pennsylvania, Nevada, and Wisconsin—the GOP and related plaintiffs have alleged both (1) procedural violations of election laws by state or local election officials, and (2) substantive instances of election fraud. This memorandum provides state-by-state charts that summarize these allegations.

In general, there is strong evidence that state and local election officials committed numerous procedural violations that reduced transparency and/or favored Democrat candidates. However, most allegations of substantive voter fraud—defined to mean the casting of illegal ballots in violation of prevailing election laws—are either relatively small in number, or cannot be verified.

Arizona	
Allegation	Description
<u>Limited Access for Observers/Poll Watchers</u> : Election officials refused to allow legal observers to fully observe the verification of signatures in Maricopa County.	Legal observers were told to remain at a card table which was ten to twelve feet away from most of the computer monitors and screens, and the computer monitors were mostly turned away—with the few visible screens still being unreadable due to distance. ¹

¹ [Proposed] Verified Statement of Election Contest, *Ward v. Jackson et al.*, Maricopa County Superior Court Case No. CV2020-015285 (Nov. 24, 2020).

<p><u>Errors with Duplicate Ballots:</u> When original ballots could not be read by electronic ballot scanners, elections officials created duplicate ballots and then scanned those. In some instances, the officials erroneously filled out the duplicate ballots. A small number of these errors were later verified in court by comparing them to the original ballots, which officials retained.</p>	<p>On December 7th, a trial court ordered a sample of 100 duplicate ballots.² Of the initial sample of 100, two were found to have been miscounted to President Trump’s prejudice, and none to former Vice President Biden’s prejudice (with one vote being erroneously “flipped” from Trump to Biden, and the other Trump ballot simply uncounted). This was a 2% error. On December 9th, the county agreed to sample an additional 2,500 duplicate ballots, and 1,525 were sampled that same day. Of the 1,525 ballots that were sampled that day, seven were found to have been erroneously counted—with five to the prejudice of Trump, and two to the prejudice of Biden. This brought the total rate of error among duplicate ballots to just over half a percentile (0.5%), which is material, given that the candidates’ total statewide vote counts were less than half a percentile apart (0.3%). There were not enough total duplicate ballots in the state, however, to affect the outcome of the election.</p>
<p><u>Statistics-based Allegations:</u> Statistical experts identified numbers suggestive of the possibility of voter fraud, but these numbers cannot be verified.</p>	<p>Experts testified that, among other things, 86,845 ballots mailed to voters were never returned to the state, 219,135 mail-in votes were recorded by voters who never requested mail-in ballots, and 5,790 ballots were cast by individuals who later moved out of the state.³ The official count shows that Biden received 10,457 more votes than President Trump, making these numbers material. Specific instances of illegal votes, however, cannot be verified at this time.</p>

Georgia	
Allegation	Description
<p><u>Limited Access for Observers/Poll Watchers:</u></p>	<p>On Election Night at State Farm Arena, election observers, the media, and most election workers left after being told that counting was completed for the night. Video footage, however, shows some election workers actually stayed on the premises for several hours and continued to count ballots largely unobserved.⁴ Initial reports that the counted ballots were taken from suitcases have been refuted by state officials.</p> <p>Some GOP poll watchers also testified to being intimidated by people working with Democrat-affiliated groups.⁵</p>

² Petition for Writ of Certiorari at 8 n. 6, *Ward v. Jackson et al.*, No. 20-809 (Dec. 11, 2020).

³ Complaint, *Bowyer v. Ducey*, No. 20-cv-02321-DJH (D. Az. Dec. 2, 2020). This case is under lawyer Sidney Powell.

⁴ Justin Gray, *Georgia election officials show frame-by-frame what happened in Fulton surveillance video*, WSB-TV Atlanta, (Dec. 4, 2020), <https://www.wsbtv.com/news/politics/georgia-election-officials-show-frame-by-frame-what-really-happened-fulton-surveillance-video/T5M3PYIBYFHHFOD3CIB2ULDVDE/>

⁵ 11Alive, *Second Georgia Senate election hearing*, YouTube, <https://www.youtube.com/watch?v=hRCXUNOwOjw>

<p><u>Failure to Investigate Potential Fraud and Abuse in a Timely Manner:</u></p>	<p>Although both Republicans and Democrats alleged election improprieties during early voting, the Secretary of State did not announce an investigation for weeks and then when he did, he announced that the results of the investigation would not change the results of the election before concluding the investigation.⁶</p> <p>Similarly, although many people,⁷ have alleged issues with signature matching on absentee ballots since Election Day, the Secretary of State chose not to announce an audit on signatures until about six weeks after Election Day. This date fell on the date that the Electoral College was to vote.⁸</p>
<p><u>Questionable Signature Matching Standards:</u></p>	<p>In Georgia, signature match is the principal way that election officials verify that absentee ballots are cast by the voters who requested them. Some have argued that a consent order the Georgia Secretary of State entered into in early 2020 impacted the state's signature matching standards.⁹ However, a recently completed audit of over 15,000 mail-in ballots that were cast in Cobb County, jointly conducted by the Secretary of State and Georgia Bureau of Investigation, found that only ten absentee ballots had signature mismatches that required further direct follow-up with the voter. Upon further investigation, eight of the ten voters whose signatures appeared to be mismatches told investigators that the signatures on the ballots were their own. In the remaining two cases, one voter signed in the incorrect spot, and the other voter's wife mistakenly signed her husband's ballot envelope.¹⁰</p>

⁶ Kate Brumback, *Georgia official announces investigations, defends election*, Associated Press, (Nov. 30, 2020), <https://apnews.com/article/election-2020-georgia-state-elections-elections-voter-registration-0dda2f95b4cea6506be9fb6555195a1c>

⁷ *Secretary of State re-certifies Georgia election results; recount confirms Biden victory*, 11Alive, (Dec. 7, 2020), <https://www.11alive.com/article/news/politics/elections/georgia-election-news-live-blog-dec-7/85-885855bd-4702-49ad-a50b-1af749a1174a>

⁸ Thomas Barrabi, *Georgia secretary of state orders ballot signature match audit in Cobb County*, Fox News, (Dec. 14, 2020), <https://www.foxnews.com/politics/georgia-secretary-of-state-orders-ballot-signature-match-audit-in-cobb-county>

⁹ *AP FACT CHECK: Trump wrong on Georgia voter signature checks*, Associated Press, (Nov. 15, 2020), <https://apnews.com/article/ap-fact-check-donald-trump-georgia-elections-voter-registration-40bb602e6f0facf8eccc331e83ab36e0>

¹⁰ <https://sos.ga.gov/admin/uploads/Cobb%20County%20ABM%20Audit%20Report%2020201229.pdf>

<p><u>Election Night Errors Uncovered by Recounts:</u></p>	<p>Floyd County found roughly 2,600 votes during the recount that were not scanned due to human error. The Secretary of State's office immediately called for the resignation of a local county official.¹¹ During the recount, three other counties discovered a total of more than 3,300 uncounted votes on memory cards.¹² Combined, these uncounted votes added a net 1,400 votes to the Trump/Pence total. When the Secretary of State was confronted with errors in the election system, he chose to minimize and deflect blame.</p>
<p><u>Trump Campaign's Numerical Allegations:</u></p>	<p>The Trump Campaign has made the following numerical allegations, which OVP has not been able to verify:¹³</p> <ul style="list-style-type: none">• As many as 2,560 felons with an uncompleted sentence were allowed to register and vote in the election.• At least 66,247 underage people were allowed to register and subsequently illegally vote.• At least 2,423 individuals were allowed to vote who were not listed in the State's records as having been.• At least 4,926 individuals were allowed to vote in Georgia who were registered to vote in another stat.• At least 395 individuals were allowed to vote in Georgia who also cast ballots in another state.• At least 15,700 individuals were allowed to vote in Georgia who filed a national change of address with the Postal Service prior to November 3, 2020.• At least 40,279 individuals were allowed to vote in Georgia who had moved across county lines at least 30 days prior to Election Day and who had failed to properly re-register to vote in their new county after moving.• At least 1,043 individuals were allowed to vote who had illegally registered to vote using a postal office box.• At least 98 individuals were allowed to vote who registered after the last day permitted under law.• At least 2,664 absentee ballots were mailed to individuals prior to the earliest day permitted by law.• At least 217 individuals were allowed to vote whose absentee ballots, according to state records, were applied for, issued, and received all on the same day.• As many as 10,315 or more individuals were allowed to vote who were deceased by the time of Election Day.

¹¹ Jason Braverman, *Georgia's election audit uncovers 2,600 uncounted ballots in presidential race*, 11Alive, (Nov. 16, 2020), <https://www.11alive.com/article/news/politics/elections/georgia-election-audit-nearly-2600-ballots-found-in-floyd-co/85-f65c3042-d4ba-4825-b1b3-a2b8ce5fb6f3>

¹² <http://www.ajc.com/politics/recount-finds-thousands-of-georgia-votes-missing-from-initial-counts/ERDRNXP3REQTM4SOINPSEP72M/>

¹³ Complaint, *Trump v. Raffensperger*, Fulton County Superior Court No. _____, (Dec. 4, 2020), <https://www.democracymocket.com/wp-content/uploads/sites/45/2020/12/Trump-v.-Raffensperger.pdf>

Michigan	
Allegation	Description
<u>Limited Access for Observers/Poll Watchers</u> : Detroit officials kicked out some Trump campaign observers, and further blocked visibility through windows by putting up paper.	During the counting of ballots, Detroit officials removed some Trump campaign observers from the TCF Center, and denied entry to others. ¹⁴ USA Today’s reporting indicates, however, that the GOP and Democrats were both allowed to have 134 observers in the room, one per table for counting absentee ballots. Paper was in fact taped up to block the windows, supposedly because election workers felt intimidated by the excluded GOP challengers taking videos through the window.
<u>Processing Invalid Ballots</u> : In affidavits, a handful of GOP observers and one election worker whistleblower allege that election workers were instructed to count numerous improperly cast ballots. ¹⁵	According to a few sworn but otherwise unverified affidavits, Detroit election workers (1) coached voters to vote for the Democrat party and then watched them vote, (2) backdated absentee ballots, (3) accepted mail-in ballots that were mailed in under names that did not match any name on the voter rolls by assigning them to other people with the same last names but who had not voted, (4) allowed people to vote in person who had previously applied for an absentee ballot but did not turn the absentee ballot in, and (5) made observers stand six feet away from the counting process, where they could not clearly see the ballots or the poll books.
<u>Statistics-based Allegations</u> : Statistical experts identified numbers suggestive of the possibility of voter fraud, but these numbers cannot be verified. ¹⁶	Experts analyzed a sample of data and found 12.23% of voters who voted by absentee ballot never requested an absentee ballot at the clerk’s office, as required by law. The experts extrapolated and determined that between 326,460 and 531,467 of the total absentee ballots were not requested by an eligible voter. The experts also allege that at least 13,248 absentee or early voters were not residents of Michigan when they voted, and that 317 of them voted in more than one state. 259 absentee ballots further illegally listed their home address as “email.”

¹⁴ Devon Link and Ashley Nerbovig, *Fact check: Videos showing crowd locked out of Detroit TCF Center with windows obstructed are missing context*, USA Today, (Nov. 10, 2020), (<https://www.usatoday.com/story/news/factcheck/2020/11/10/fact-check-videos-crowd-locked-out-detroit-center-lack-context/6195038002/>); see also Tresa Baldas et al, *Get to TCF: What really happened inside Detroit’s ballot counting center*, Detroit Free Press, (Nov. 6, 2020), <https://www.freep.com/story/news/local/michigan/detroit/2020/11/06/tcf-center-detroit-ballot-counting/6173577002/>

¹⁵ Complaint, *Constantino v. Detroit*, Wayne County Circuit Court No. 20-014780-AW (Nov. 8, 2020), <https://assets.documentcloud.org/documents/20403147/wayne-county-michigan-election-fraud-lawsuit.pdf>

¹⁶ Petition for Extraordinary Writs, *Johnson v. Benson*, No. ____ (Mich. 2020), <https://www.democracydocket.com/wp-content/uploads/sites/45/2020/11/Johnson-Petition-for-Extraordinary-Writs-1.pdf>

Nevada	
Allegation	Description
<u>Illegal Use of Signature Verification Machine</u> : The Clark County Election Department illegally used a machine to verify 30% of signatures, even though law requires an employee to check the signatures. ¹⁷	AB4 requires “the clerk or an employee in the office of the county clerk shall check the signature used for the mail ballot in accordance with” detailed procedures. ¹⁸ Those procedures do not include relying on artificial intelligence software to verify matching signatures. Moreover, neither the Election Ordinance of Clark County, nor the Nevada State Constitution, make any provision for the electronic verification of signatures. Clark County is the only county in Nevada that uses the Agilis system and the only county in Nevada that does not verify signatures on absentee and mail in ballots in person.
<u>Voter Fraud</u> : When a voter showed up in person to cast a ballot, she was told that she had already voted by mail—even though she had not. ¹⁹	The voter believes that it was Clark County’s use of Agilis signature-verification software that allowed her mail-in ballot, which she had not signed or mailed, to be accepted and counted in the Election.
<u>Limited Access for Observers/Poll Watchers</u> : The Nevada Republican Party and the President’s campaign accused Clark County election officials of “restricting poll watchers.” ²⁰	The Nevada Republican Party and the President’s campaign allege that observers were restricted from entering some areas where ballots were being handled and reviewed.
<u>Statistics-based Allegations</u> : Statistical experts identified numbers suggestive of the possibility of voter fraud, but these numbers cannot be verified . ²¹	Data analysis showed that up to 42,284 Nevada voters returned more than one ballot. It also showed that almost 23,000 ballots were mailed to voters with either non-Nevada addresses or to individuals who had changed their address to a state outside of Nevada within 30 days—therefore not meeting the residency requirement to be eligible to vote. And potentially 1,506 voters who were listed as deceased may have cast ballots.

Pennsylvania	
Allegation	Description
<u>Elimination of Election Integrity Protections</u> : The Democrat	The Democrat Secretary of the Commonwealth entered into a collusive litigation settlement to illegally aid Democrats. First,

¹⁷ *Id.* (Ex. 121).

¹⁸ NRS 293.8874(1).

¹⁹ Complaint, *Stokke v. Cegavske*, No. 20-cv-02046 (D. Nev. 2020),

<https://www.democracydocket.com/wp-content/uploads/sites/45/2020/11/Stokke-v-Cegavske.pdf>

²⁰ Kristy Leonard, *Trump campaign accuses Clark County of ‘restricting observers,’ calls for changes to vote-counting process*, The Nevada Independent, (Oct. 22, 2020),

<https://thenevadaindependent.com/article/trump-campaign-accuses-clark-county-of-restricting-observers-calls-for-changes-to-vote-counting-process>

²¹ Plaintiffs’ Proposed Findings of Fact and Conclusions of Law, *Law v. Whitmer*, Nev. No. 20 OC 00163 IB (1st Jud. Dist. Ct., Dec. 3, 2020) (Ex. 49, 67, 92).

<p>Secretary of the Commonwealth colluded with Democrat plaintiffs to eviscerate election protections.</p>	<p>the Secretary illegally permitted unsecure drop boxes at locations other than the county boards of elections. The left-leaning Pennsylvania Supreme Court upheld that change.²² Second, the Secretary removed signature verification requirements and secrecy envelop requirements for mail-in ballots. The left-leaning Pennsylvania Supreme Court upheld the signature verification change, but found the change to the secrecy envelop rule contrary to law.²³ Last, the Secretary tried to extend the deadline for voters to resolve proof of identification issues with their mail-in and absentee ballots, a move that was enjoined by a state court.²⁴</p>
<p><u>Processing Invalid Ballots:</u> Democrat-majority counties voted to count illegal votes, and the Pennsylvania Supreme Court allowed it.</p>	<p>Pennsylvania law prohibits counting mail-in ballots unless the envelope is properly filled out, dated, and signed, but election boards in Democrat-majority counties like Philadelphia and Allegheny voted to count ballots that did not meet these requirements,²⁵ and further set up unlawful procedures for curing defective ballots.²⁶</p> <p>The Pennsylvania Supreme Court ultimately decided to count 2,349 signed but undated mail-in ballots, even though the Court acknowledged they were invalid.²⁷ The Court concluded that because the disputed ballots were received by 8:00 pm on Election Day, there was no danger that they were untimely or fraudulent. Therefore, according to the Court, they should be counted, even though they were technically invalid.</p>
<p><u>Lack of Observers:</u> Some Democrat counties refused to allow Republicans to observe the</p>	<p>A court eventually ordered on November 5 that all candidates, watchers, and candidate representatives be permitted to be</p>

²² Sam Gringlas, *Pennsylvania Supreme Court Extends Vote By Mail Deadline, Allows Drop Boxes*, NPR, (Sept. 17, 2020), <https://www.npr.org/2020/09/17/914160122/pennsylvania-supreme-court-extends-vote-by-mail-deadline-allows-drop-boxes>

²³ Marc Levy, *Ballots can't be tossed out over voter signature, court says*, Associated Press, (Oct. 23, 2020), <https://apnews.com/article/election-2020-donald-trump-pennsylvania-elections-courts-b7a57deead8ae82d54ad55726a018f92>; Kelly Mena, *'Naked' ballot rules put thousands of Pennsylvania mail-in votes at risk, Philadelphia official warns*, CNN, (Sept. 22, 2020), <https://www.cnn.com/2020/09/22/politics/pennsylvania-warning-secrecy-envelope-2020-election/index.html>

²⁴ Matthew Santoni, *Trump Contests Pa. Extension For Fixing Voter ID Issues*, Law 360, (Nov. 5, 2020), <https://www.law360.com/articles/1326200/trump-contests-pa-extension-for-fixing-voter-id-issues>

²⁵ Jeremy Roebuck and William Bender, *Trump's campaign is challenging mail and provisional ballots at record rates in Philly and its suburbs*, The Philadelphia Inquirer, (Nov. 11, 2020), <https://www.inquirer.com/news/philadelphia-election-results-trump-legal-challenges-pennsylvania-mail-ballots-provisional-20201111.html>

²⁶ Nydia Han and Heather Grubola, *Lawsuits filed over curing ballots in Pennsylvania during 2020 election*, 6 Action News Philadelphia, (Nov. 4, 2020), <https://6abc.com/pennsylvania-ballots-votes-voting-pa/7647945/>

²⁷ *In re: Canvass of Absentee and Mail-in Ballots of November 3, 2020 General Election*, No. 31 EAP 2020 (Pa. 2020), <https://law.justia.com/cases/pennsylvania/supreme-court/2020/35-eap-2020.html>

processing and counting of mail ballot and envelopes. ²⁸	present to observe Philadelphia’s vote canvassing process within a distance of six feet.
<u>Unlawful Curing of Defective Ballots</u>	Democrat election officials in Montgomery County notified when their ballots were defective so they could cure them, even though they had no statutory authority to do so. Law-abiding Republican counties did not extend the same (unlawful) opportunity to Republicans. In addition, the office of the Secretary of the Commonwealth issued guidance right before Election Day stating that voters with defective mail-in ballots could be issued provisional ballots, despite a legal requirement that the voter must swear that the provisional ballot is the only ballot cast. The Democrat party then targeted its voters with printed handbills informing them of this invented right to re-vote. ²⁹
<u>Voters Receive Pre-Filled Ballots:</u> Two voters allegedly received pre-filled ballots.	The two ballots, discovered in Brownsville and Farmington, had been filled out before voters received them, the county District Attorney said. ³⁰ The District Attorney opened an investigation.
<u>Mail Carrier Throws Away Ballots</u>	A temporary postal worker discarded nine military general election ballots. ³¹ Her supervisors were informed and she was fired.

Wisconsin	
Allegation	Description
<u>Municipalities Dispensed with Application Requirements:</u> A total of 170,140 absentee ballots were issued and cast in Milwaukee County (108,947) and Dane County (61,193) without the required written application. ³²	Wisconsin Statute § 6.86(1) prohibits, with limited exceptions, municipal clerks from issuing an absentee ballot unless the clerk receives a written application from a qualified voter during the 14-day in-person absentee voting period. Instead, in both Dane and Milwaukee Counties, the Canvassing Boards found that the Clerk's receipt of form EL-122 (the "Envelope" in which the absentee ballot is placed by the voter after it has already been received by the voter and after it has been completed) was sufficient to satisfy the statutory written application requirement. ³³

²⁸ Keith Schweigert, *Judge reverses Philadelphia Court ruling, orders all campaign representatives can observe vote counting process from distance of 6 feet*, Fox 43, (Nov. 5, 2020), <https://www.fox43.com/article/news/politics/judge-reverses-philadelphia-court-ruling-orders-all-campaign-representatives-can-observe-vote-counting-process-from-distance-of-6-feet/521-fa696748-c738-495f-aa64-4f3efb2e134e>

²⁹ Complaint, *Metcalf v. Wolf*, No. ____, (Pa. Cmwlth. 2020).

³⁰ *Fayette DA: Two voters received pre-filled ballots*, Pittsburgh Post-Gazette, (Oct. 31, 2020), <https://liber.post-gazette.com/local/south/2020/10/31/Fayette-County-election-pre-filled-ballots-Richard-Bower-district-attorney-KDKA/stories/202010310053>

³¹ Viktoria Hallikaar, *Luzerne County says a temporary worker threw out military ballots*, Fox 56, (Sept. 25, 2020), <https://fox56.com/news/local/luzerne-county-responds-to-umova-ballot-investigation>

³² Complaint, *Trump v. Evers*

³³ *Id.*

<p><u>Absentee Ballots with Incomplete Certifications:</u> A total of 5,517 absentee ballots with incomplete or incorrect EL-122 Ballot Envelopes on which municipal clerks in Milwaukee County (2,215) and Dane County (3,302) added missing information were illegally counted.³⁴</p>	<p>Wisconsin Statute § 6.87(6d) requires absentee ballots with a certificate missing the address of a witness not be counted. Municipal clerks in Milwaukee County and Dane County illegally added missing witness information to ballot certifications. In accordance with Wisconsin Statute § 6.84(2), absentee ballots accompanied by incomplete certifications or those ballots which municipal clerks in Milwaukee County and Dane County added missing information are illegal and invalid.³⁵</p>
<p><u>Absentee Ballots Improperly Issued to Voters Claiming Indefinite Confinement Status:</u></p>	<p>In March 2020 the Dane County Clerk and Milwaukee County Clerk concluded that during the COVID-19 emergency and based upon the Governor’s Stay at Home order, all voters within the county could declare themselves “indefinitely confined” due to illness for purposes of obtaining an absentee ballot. This designation further allowed voters claiming it to circumvent the state’s photo ID requirements.</p> <p>On March 31, 2020, the Wisconsin Supreme Court granted the GOP’s request for preliminary injunctive relief, concluding that the Dane County Clerk could not direct voters that anyone could request an absentee ballot as indefinitely confined due to the pandemic and governor’s stay-at-home order. The Court concluded that under Wisconsin law declaring oneself indefinitely confined or disabled for an indefinite period is an individual determination that only an individual elector can make and that determination may be based only upon age, physical illness, or infirmity, and that the mere presence in the community of a communicable disease, such as COVID-19, does not itself entitle all electors in Wisconsin to obtain an absentee ballot.</p>
<p><u>Absentee Ballot Cast for Dead Voter</u></p>	<p>A woman was charged with election fraud after a police investigation found that she submitted an absentee ballot for her deceased spouse. Investigators said the suspect not only confessed, she also listed herself as the voter’s witness on the ballot envelope.³⁶ The attempted fraud was caught, and the ballot was not counted.</p>
<p><u>Illegal Correcting of Ballots</u></p>	<p>Clerks corrected or cured missing witness address information on mail-in envelopes, which Republicans contend violated a state law stating that “[i]f a certificate is missing the address of a witness, the ballot may not be counted.”³⁷ The guidance permitting the address correction procedure had been in place since 2016.</p>

³⁴ *Id.*

³⁵ *Id.*

³⁶ Ben Jordan, *Cedarburg woman charged with election fraud, accused of submitting dead partner’s ballot*, TMJ4, (Nov. 24, 2020), <https://www.tmj4.com/news/election-2020/cedarburg-woman-charged-with-election-fraud-accused-of-submitting-dead-partners-ballot>

³⁷ Wisconsin clerks altered ballot information according to guidance (jsonline.com)

<p><u>Improper Completion or Delivery of Absentee Ballots by Madison Clerk:</u></p>	<p>In an event dubbed “Democracy in the Park, a total of 17,271 absentee ballots were collected by employees of the City of Madison on September 26, 2020, and October 3, 2020, at 206 separate locations.”³⁸ Representatives of the City Clerk’s Office registered voters, received ballots, helped in the completion of Ballot Envelopes, instructed on the ballot process, and acted as witnesses for voters. The creation of 206 separate locations for the Clerk’s Office did not comply with Wisconsin Statute § 6.855(1) in numerous respects. As such, the activities conducted were illegal.³⁹</p>
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³⁸ *Id.*

³⁹ *Id.*