

ARIZONA

- State officers and Maricopa County Officials failed to enforce the state law against private companies from directing federal election administration and allowed for gaps in elector ballot chain of custody through the use of “mobile” drop boxes that are stationed in unsupervised public locations.
- State officers and Maricopa County Officials failed to enforce the state law against double voting.
- State officers and Maricopa County Officials failed to enforce the state law against allowing people to vote using an address where they no longer live.

GEORGIA

- Disparate impact of Georgia voters through a private corporation directing federal election administration through grants. For example, Fulton County, flush with cash, initiated public-private coordinated voter registration drives allowing private access directly to government voter registration files, access to early voting opportunities, along with the coordinated provision of incentives for early voters and the off-site collection of ballots, establishes disparate impact. Outside of Fulton County, election officials were unable to initiate equal efforts.
- For example, Fulton County, flush with cash initiated public-private coordinated voter registration drives allowing private access directly to government voter registration files, access to early voting opportunities, along with the coordinated provision of incentives for early voters and the off-site collection of ballots, establishes disparate impact. Harding Decl., Exs. A, B, C. Outside of Fulton County, election officials were unable to initiate equal efforts.
- In addition, the private corporation money allowed for the distribution of unattended ballot drop boxes in the privately funded counties. The funded counties had a drop box every 14 square miles while unfunded counties had a drop box every 294 square miles.
- Violate Georgia absentee laws, such as Ga. Code § 21-2-386, through a settlement agreement between the Secretary of State and Democrat Party Agencies (Democrat Party of Georgia, DSCC, DCCC). This agreement created rules for processing absentee ballots that directly contradict the legislature's intent.
- Georgia's election officials did not enforce state law residency requirements on voters who changed addresses before the November 3, 2020 election.
- **Georgia's election officials did not enforce state law against double voting.**

WISCONSIN

- Wisconsin cities accepted private sector funding for election administration in return for the non-profit organization directing how elections are administered. In Wisconsin, cities and counties may only take in revenue from taxes, bonding, fines, fees or state grants. Wisconsin Statutes §§ 59.51, 65.07, and, generally, Ch. 70.
- Other than taxation revenue, Wisconsin cities are not allowed to accept other monies for election administration other than federal Help America Vote Act grants. This money must come from the Wisconsin Election Commission. Wisconsin Statutes § 5.05 (10) & (11).
- Wisconsin cities allowed for gaps in elector ballot chain of custody through the use of “mobile” drop boxes that are stationed in unsupervised public locations where Wisconsin law requires that the absentee elector must either mail the absentee ballot envelope or deliver the absentee ballot envelope to the municipal clerk. Wisconsin Statutes § 6.87 (3)(b)(1).
- The Wisconsin Elections Commission issued a directive to county and municipal clerks to not reject indefinitely confined absentee voters even if the clerk possesses reliable information that the allegedly indefinitely confined absentee voter is no longer indefinitely confined. These actions were not a valid exercise of discretion under Wis. Stat. § 6.86 (2)(a-b).
- The Wisconsin Election Commission again went beyond its discretion under Wisconsin law when it distributed guidance to county and city clerks that they could use any resources at their disposal to fill in information electors forgot on their absentee ballot certificates. Following this guidance, the Milwaukee Election Commission instructed clerks reviewing absentee envelope certifications to also “cure” or fill in missing information on the envelope. This is another invalid use of discretion under Wis. Stat. § 6.87 (6)(d).

MICHIGAN

- Michigan election officials failed to provide meaningful observation is a violation of the Michigan Constitution, Const. 1963, art 2, § 4(1)(h), as well as state statute MCL § 168.765a(12).
- Election officials violated the plain language of the law MCL § 168.765a by permitting thousands of ballots to be filled out by hand and duplicated on site without oversight from bipartisan poll challengers.
- Election officials again violated MCL § 168.765a by allowing unsecured QVF access to private corporations. Groups like Rock the Vote were allowed to have direct access to state voter files in order to register votes. This also created the opportunity to create new voters in the system.
- Numerous statewide irregularities in absentee ballot oversight led to state officials circulating guidance or ignoring laws. For instance, when a ballot is unable to be read by an election device, MCL § 168.765a dictates an observer for each party approves curing a ballot when an election official will determine the will of the voter and transfer it to a new ballot. Many times it was observed that only a Democrat observer approved the changes.
- In violation of Michigan law to secure ballots, the City of Detroit held a drive-in ballot drop off where individuals would drive up and drop their ballots into an unsecured tray. No verification was done. This was not a secured drop-box with video surveillance. To encourage this practice, free food and beverages were provided to those who dropped off their ballots using this method.
- The acceptance of private money from the Center for Tech and Civic Life is a violation of the Help America Vote Act because Counties and cities cannot spend money on federal elections without going through the proper state and federal channels under HAVA transparency rules.

PENNSYLVANIA

- Mark Zuckerberg, through his donations to the Center for Tech and Civic Life, is attempting to administer Pennsylvania's Presidential federal election through their conditional grants. Paying for federal elections is synonymous with influencing federal election policy and is a violation of the Elections Clause.
- Under the Elections Clause, counties and cities, as political subdivisions of a state, have no power to accept private money to pay for federal elections.
- The social contract of the Federal Elections Clause requires exclusively-publicly-funded federal elections, thus prohibiting such private federal election grants. According to Appellants, not even Congress can authorize the private funding of our federal elections without violating the Elections Clause.
- The second legal proposition is that the federal common law under the Elections Clause recognizes such private financing as tortious interference with the social contract embedded in the Elections Clause and recognizes citizens as a third party beneficiary of that social contract for lawsuit purposes.
- The third legal proposition is that the federal common law under the Elections Clause recognizes Article III standing, including an actual and concrete injury, for a citizen within a political subdivision to challenge the political subdivision accepting private federal election grants interfering with the citizen's Elections Clause guarantee of exclusively publicly-funded federal elections.