

AFFIDAVIT OF  
JEFFREY A. GORMAN

JEFFREY A. GORMAN, 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 ON FACEBOOK AND OBSERVED THAT FRIENDS REGARDING CALL AFTER ELECTION <sup>WERE</sup> LOOKING FOR VOLUNTEERS. I AGREED TO VOLUNTEER
4. I WENT TO THE TCF CENTER ON WEDNESDAY, NOVEMBER 4, 2020 AT 12:30 PM

5. THERE WAS ABOUT A TEN MINUTE INSTRUCTION GIVEN FOR ALL VOLUNTEERS:

1) THERE HAD TO BE A REGISTERED VOTER IN EITHER THE ELECTRONIC BOOK OR WRITTEN BOOK, IF NOT CHALLENGE IT; AND

2) IF THERE WERE DUPLICATE BALLOTS OR XEROX'D / COPIED BALLOTS (i.e., IF MILITARY FAX VERSION), THERE MUST BE TWO PAID WITNESSES (DEMOCRAT AND REPUBLICAN), IF NOT CHALLENGE IT.

6. I TRIED TO ENTER AROUND 2:00 PM / 2:30 PM. I WAS IN THE SECOND GROUP OF ABOUT TEN PEOPLE.

7. I KNEW THAT PEOPLE HAD LEFT, BUT THEY WOULD NOT LET REPLACEMENT POLL CHALLENGERS IN.

8. THAT OUR GROUP WAS TOLD THAT IT WAS DUE TO COVID-19 WHY PEOPLE WERE NOT BEING LET IN. THIS WAS TOLD BY THE PEOPLE AT THE DOOR.

9. THERE WAS A REPRESENTATIVE THAT IDENTIFIED HIMSELF AS A HEALTH OFFICIAL AND SAID NO ONE COULD GO IN DUE TO COVID-19 RESTRICTIONS.

10. I FINALLY SIGNED IN AT 6:06 PM ON NOVEMBER 4, 2020 TO GO IN. I WAS PUT IN BOOK 1.

11. I WAS AT TCF CENTER UNTIL APPROXIMATELY 8:30 PM ON NOVEMBER 4, 2020.

12. I WAS WORKING BETWEEN TWO (2) TABLES.

13. I WOULD FOLLOW THE MILITARY BALLOTS TO THE TABLE AND WATCHED HOW IT WAS PROCESSED.

14. AT BOTH TABLES I OBSERVED NO WITNESSES AS REQUIRED.

15. I CHALLENGED THE FIRST BATCH OF BALLOTS AND THEN MORE BALLOTS CAME TO THE SECOND TABLE.

16. THERE WAS A FEMALE AT THE SECOND TABLE AND WHEN I QUESTIONED THE WITNESS ISSUE, SHE STATED SHE DID NOT KNOW WHAT THEIR AFFILIATION WAS AND I SHOULD GO ASK

17. BASED UPON THE REQUEST, I WENT TO ASK THE AFFILIATION OF THE ONE WOMAN CLAIMING TO BE A WITNESS AND SHE WOULD NOT TELL ME.

18. I THEN SPOKE TO A WOMAN IDENTIFIED AS A DEMOCRAT LAWYER AND TOLD ME THAT I DID NOT KNOW WHAT I WAS TALKING ABOUT WHEN I QUESTIONED THE BALLOTS. THIS WOMAN REFUSED TO GIVE ME HER NAME.

19. I HAD CHALLENGED THE FIRST BATCH OF ABOUT TWO TO THREE BALLOTS AS WELL AS CHALLENGED THE SECOND BATCH OF ABOUT SIX TO EIGHT BALLOTS THESE WERE ALL MILITARY ABSENTEE BALLOTS.

20. I HAD FILED AN INCIDENT REPORT IMMEDIATELY FOLLOWING MY TIME ON THE FLOOR, WHICH WAS AROUND 8:30 P.M.

21. WHILE I WAS CHALLENGING BALLOTS, I OBSERVED BALLOTS BEING BROUGHT BY A SUPERVISOR.

22. AFTER THE SUPERVISOR BROUGHT THESE BALLOTS OVER, A RED FLAG WAS RAISED DUE TO THE ISSUES WITH THE BALLOTS.

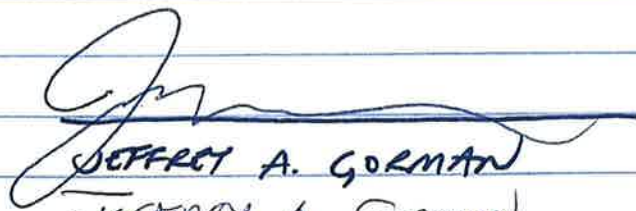
23. THEREAFTER, A WOMAN CAME IN FROM SOME OTHER LOCATION AND TOLD THE DATA WORKER, "I MADE SURE THEY WERE REGISTERED" EVEN THOUGH THE NAMES WERE NOT IN EITHER ELECTRONIC OR WRITTEN BOOK.

24. I THEN OBSERVED THEY WERE INPUTTING IN THE SYSTEM THESE NAMES AS REGISTERED (ALTHOUGH NOT IN EITHER ELECTRONIC OR WRITTEN BOOK) OR AS APPEARED ON THE PAPERWORK FOR THE BALLOT.

25. THESE AFOREMENTIONED ACTIONS WERE AGAINST THE RULES.

26. ADDITIONALLY, THEY WERE INPUTTING FICTITIOUS BIRTH DATES WITH THE NAMES ON THE PAPERWORK FOR THE BALLOT AND I OBSERVED THIS OCCUR.

DATED: NOVEMBER 8, 2020

  
JEFFREY A. GORMAN  
JEFFREY A. GORMAN

SUBSCRIBED AND SWORN TO  
BEFORE ME ON: 11/8/2020

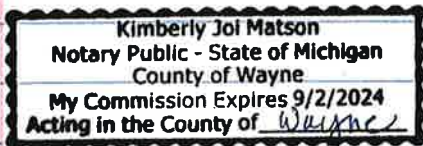
NOTARY PUBLIC, Kimberly J. Matson

STATE OF MICHIGAN;

COUNTY OF Wayne

MY COMMISSION EXPIRES: 9/2/2024

ACTING IN THE COUNTY OF: Wayne

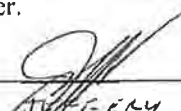


**AFFIDAVIT OF JEFFERY MOSS**


Jeffery Moss, 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 Monday November 2, 2020 from 10:00am to 8:00pm I was a Republican challenger at the TCF Center in Detroit, Michigan. I was a challenger at Table 68. I was told by election workers to back away from the table and stay six feet away from the table. I was able to move closer at times, but was told to stay six feet away.
4. On Tuesday November 3, 2020 from 10:00pm to 5:00am on Wednesday November 4, 2020 I was a Republican Challenger at the TCF Center in Detroit, Michigan. I observed a group of men walking around and intimidating Republican challengers and observers.
5. At approximately 4:00am on Wednesday November 4, I overheard that there only 16,000 outstanding ballots to count at the TCF Center.

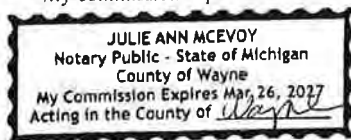
Dated: November 8, 2020

  
 \_\_\_\_\_  
 JEFFERY MOSS  
 [Print name]

Subscribed and sworn to before me on:

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

My commission expires:



I am a registered voter at this address in Michigan - 22453 Maple Avenue Farmington, MI 48336

I am working as an official election challenger approved by the Michigan Republican Party at the TCF Center in Detroit.

Today, November 3, 2020, I witnessed a duplication of a voter ballot in ICC #6, AVCB #26 at 1455 hrs without a Republican present. I asked if the table had requested Republican witness and they answered "no". The reason given for duplicate ballot was that it was returned from the scanner as being unreadable. The ballot number from the new ballot was 02038, and the number had already been removed from the old ballot. I was only able to witness the non-partisan side duplication.

Susan L. Mills  
SUSAN L. MILLS  
Notary Public  
Exp. October 27, 2025

Respectfully,  
Jennifer L. Seidl  
Jennifer L. Seidl  
22453 Maple Avenue  
Farmington, MI 48336



State of New Jersey )  
County of Monmouth ) ss:

John M. Downing, Jr. being duly sworn, deposes and says:

1. I am a volunteer with Lawyers for Trump. I was in Detroit on November 3 and 4, 2020. I called about 60 volunteer poll challengers on November 4, 2020 to ask them to go to Cobo Convention Center to act as vote-count watchers, known as "poll challengers."

2. At about 2:30 p.m. Eric Torrison, another Republican volunteer and I went to Cobo Convention Hall because one of the poll challengers, Karen, had called me several times from 10:30 am to 2:00 p.m. to say that about 20 poll challengers were on the rooftop waiting go in, but were being denied access to the building. Karen was upset. They were all on the roof top parking deck (where they parked because there was free parking) of the Convention Center, and were not being allowed into the building.

3. At 3:20 pm on Nov. 4, 2020 Mr. Torrison and I went to the rooftop of the Convention Center via elevator that was manned by a security guard on the main floor. There were at least 19 Republican challengers waiting on the roof and asking to be let in to the building.

4. I spoke to a security guard, Daniel Sims, who was guarding the door.

5. I asked Mr. Sims three times to allow the people on the roof in. Each time he refused. I video-taped the requests in a 10- minute video that I have on my cell phone.

6. Mr. Sims said that he could not let the volunteers in because his bosses had told him that they could not come in due to "Covid regulations." I asked what Covid regulations, and he said "no comment."

7. The people on the roof all wore masks and all said that they had no symptoms and had not been near anyone with Covid symptoms in the past several days.

8. I suggested to Mr. Sims that if Covid restrictions were the reason that the Republicans were not allowed in, then Mr. Sims should allow Republicans in alternately with Democrats coming out. Mr. Sims did not respond to this request.

9. Mr. Sims said that he was instructed by his supervisors, the Cobo Convention Center general manager, Claude Molinari, and building public safety manger, Bruce Smith, that he was not to allow people in because of Covid restrictions.

10. We went to the main floor and asked security guard Bridgit Sewell if we could see Mr. Molinari. She called Mr. Molinari's assistant, Ms. Leece, who told Ms. Sewell that Mr. Molinari was not available. Officer Sewell called Mr. Smith. In about 30 minutes Mr. Smith arrived on a Segway machine.

11. When we asked to Mr. Smith why the people on the roof were not being admitted. Mr. Smith first said they were not allowed in because they did not use the Level A, Washington Street basement parking garage. He provided no reason why they should use the basement parking garage. Neither Mr. Smith nor Mr. Sims had tried to re-direct the people to the Level A, Washington Street parking area, despite the volunteers' repeated requests to come in from 10:30 to about 3:21 p.m.

12. We asked Mr. Smith whether the people on the rooftop would be admitted to the building if they used the Washington Street entrance. He said they would be let in.

13. Mr. Smith did not say anything about any Covid restrictions, as Mr. Sims kept repeating to the people on the roof from about 10:30 a.m to 3:21 p.m.

14. Mr. Torrison and I went to the Level A Parking garage through an elevator and spoke and spoke to security guard Mr. Bryce (a slim black male, about 30 years old, who had been there at about 3:15 pm).

15. Mr. Bryce said that no one was allowed in through the Garage A, Washington Street entrance. We said that Mr. Smith said they could enter through Garage A. Mr. Bryce then said that if Mr. Smith said it was OK, then it was OK with Mr. Bryce.

16. At about 4:45 Mr. Torrison and I returned to the rooftop to tell the volunteers on the roof that they should come in through the Garage A, Washington Street. But the volunteers were gone. Only two people were on the rooftop-- Officer Pryde, a black female officer and officer Van Sickle a white male officer who were then stationed on the rooftop. (They had not been there at 3:20 pm.)

17. Officer Pryde and Van Sickle were uncooperative and refused to tell us when the challengers had left the roof, despite our persistent questioning.

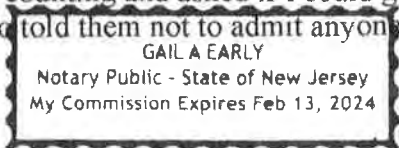
18. We spoke again to Daniel Sims to pinpoint exactly when the police arrived on the roof-top.

19. Officer Pryde said that it was actually Mr. Bruce Smith who locked the door to the roof.

20. At about 5:00 p.m on November 4, 2020 were told in the staging room that they were letting lawyers into the counting room via Garage A. We tried to find a garage but could not find it.

21. We returned to the main door of the counting room. Three or four heavily armed Detroit police were guarding the front door. Approximately 4 large windows had cardboard on the inside of the windows to block the view into the counting room.

22. I advised the white female and two black males in heavily armed gear that I was an attorney and wanted to observe the counting and asked if I could go in. They refused. They said that it was that their sergeant who told them not to admit anyone.



*John M. Downing Jr.*  
John M. Downing, Jr.

*On 11/7/2020 JOHN M. DOWNING JR appeared & PWORN to the document in my presence.*

**AFFIDAVIT OF JOYCE SANKEY**

Joyce Sankey, 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 TCF Center in Detroit, MI at approximately 1:30 pm on November 4, 2020.
4. I was directed to room 260 to get trained to be a poll challenger.
5. I was denied access to the room where the votes being counted.
6. I was denied access for 5 hours.
7. I observed that as a group of GOP observers would approach the room, the doors were closed and access was denied.
8. I observed Democratic observers approach the room and permitted access.
9. The GOP observers were forced to wait in room 260 up the stairs from the room far from the room where the votes were being counted.
10. The Democratic observers were allowed to remain at a table just outside the room where the votes were being counted.
11. At 4:00pm, I was informed to take off the green band that identified me as a GOP observer because those of us with the green bands were being harrassed. I was also told the Democratic challengers were putting on green bands posing as GOP.
12. I was informed that the only way I would get in to observe would be as an "independent".
13. I never gained access.

14. A "health inspector" claimed the room was at capacity. This was disputed and that is when the people inside blocked the windows.

Dated: November 8, 2020

*Joyce M. Sankey*  
Joyce M. Sankey  
Joyce Sankey 11/8/20

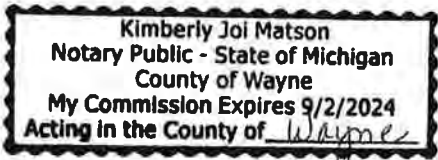
Subscribed and sworn to before me on: 11/8/2020

*Kimberly J. Matson*

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

My commission expires:

*9/2/2024*



**AFFIDAVIT OF KAREN OSTIN**

Karen Ostin, 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 2, 2020 I was a challenger at the TCF Center in Detroit, Michigan for the Republican Party. I was there from 9:00am until 9:00pm.
4. I was at table 20 and challenged a ballot and was told the ballot number was all 0's and then ending with 212. Approximately fifteen minutes later I challenged another ballot and was given the same ballot number. The names on these two ballots were different. I was given no explanation for this duplicate number.
5. On Wednesday November 4, 2020 I returned to the TCF Center at approximately 11:00am. I was told, along with other Republican challengers, that we could not enter the counting room. The election workers stated that the room was full.
6. After being told the room was full, I observed people leaving the room. When asked about this, election workers would not explain why more Republican challengers

could not enter. The election workers would not show us the sign-in book to be able to determine how many Republican challengers were in the counting room.

7. I stayed at TCF Center from until 3:00pm on November 4, 2020 and was never allowed to enter the counting room.

Dated: November 8, 2020



[Print name]

KAREN OSTIN

Subscribed and sworn to before me on:

/s/ *Jessica M. G.* 11-8-2020

Notary public, State of Michigan, County of:

