

AFFIDAVIT OF MARK KERSTEIN

MARK KERSTEIN, 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. ICC#23 Supervisors did not allow a challenge to open bin of approx. a dozen problem ballots and would not allow me to document any ballot numbers (AV-116. Ballots were not in EPollbook - I believe that is why they were putting them in the problem ballot bin. I was surrounded by 4-5 Dem challengers and intimidated when attempting to get the name of the supervisor who denied me the challenge. Supervisor refused to give him his name. Attempted to deflect him to a different person. That is when the D-challengers swarmed him. Supervisor then directed him to a female supervisor, who would not give him her name either and also refused to accept his challenge. D's were making a concerted effort to distract him and his fellow Republican challengers and fellow challengers were reporting the same thing.
4. At a separate table ICC#24, CB #25, I also saw two poll workers recording a duplicate ballot possibly without including a GOP counterpart. (Ballots I was able to notice #02168 and 02170)

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



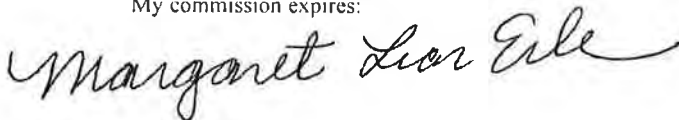
Mark KERSTEIN
Mark Kerstein

Subscribed and sworn to before me on:

1st 11-08-2020

Notary public, State of Michigan, County of:

My commission expires:



AFFIDAVIT OF MARK MODLIN

Mark Modlin, 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 Tuesday November 3, 2020 I was a Republican challenger at the TCF Center in Detroit, Michigan.
4. While acting as a challenger, I observed a ballot that I wanted to challenge and told an election worker. The election worker told me not to talk to her and to get her supervisor. Her supervisor was not nearby. I wanted to ensure that I had the ballot number and information in order to challenge the ballot. I walked closer to the station the election worker as working at. At that time, a male election worker stepped in my way and physically blocked me. The male election worker pushed me backwards. This impeded by ability to observe and challenge. The ballot I wished to challenge was processed.
5. I then spoke to a supervisor about the challenging process. There was an option on the election computer system to “quarantine” ballots, but the supervisor told me that this

option did not work. The supervisor told me there was no way to separate a challenged ballot and stop it from being processed.

- 6. The male election worker who physically blocked me was later assigned to walk around the room. He attempted to walk in front of me and block me view. He blocked the view of other challengers as well. This impeded by ability to properly observe and challenge. This election worker continued to attempt to block my view and others for approximately two hours until an announcement was made for election workers to not block the view of challengers.

Dated: November 8, 2020

Mark Modlin

[Print name] MARK MODLIN

Subscribed and sworn to before me on:

/s/ 11-08-2020

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 Mercedes

Wirsing, 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.

When the GOP challenger left the counting board room I asked if my husband and I could replace them with the two GOP challengers by the outside door and the police officer said they were not letting GOP replace GOP ^{despite, numerous} tables without GOP challengers. On Nov. 4th, there were more Democrat challengers in the counting board. "No?"

On Nov. 3rd the supervisor announced "Are there any Republican workers here working today?" I couldn't see any one raise their hand. However the Supervisor (on stage) announced "We have two Republican workers here."

Then the next day I asked the table supervisor "Are there any Republican workers here, at this table?" The table supervisor reported "I don't know their political party." I should be one Republican worker at this table. One supervisor was very aggressive and hostile, would not let me get close enough to see ballots or monitor. I witnessed numerous bins.

On Nov 3rd I witnessed ^{Thurs. Nov 5th} ~~opened~~ ballot envelopes without sleeves until 2:00 AM when we left. Mercedes Wirsing

Subscribed and sworn to before me on:

/s/ _____

Notary public, State of Michigan. County of:

My commission expires:

Printed Name:

Mercedes Wirsing

11-8-2020

MERCEDES WIRSING

All of the military ballots were opened before they arrived at counting board. ^{More than} Several birthdates were listed as 1900. I asked the supervisor "Why 1900?" She said "it was because they were in the wrong precincts." At one point #46 monitor (at ^{the} table) showed the wrong time and some of dates of military citizens had the wrong birthdates 1900 and some had 1940 at table #3.

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

Mercedes Wirsing
Mercedes Wirsing
11-8-2020

Subscribed and sworn to before me on:
1st November 8, 2020

Notary public, State of Michigan, County of:

My commission expires:
07-22-2026

AFFIDAVIT OF MICHAEL CASSIN

Michael Cassin, 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 credentialed as an independent challenger at Cobo Hall on Wednesday, November 4.
4. I was outside the ballot counting door for approximately 4 to 5 hours, Wednesday afternoon. At one point during this time, I was told 10 people could get into the counting area. Nine were let in. The 10th person in line, Adam Chesney, said he was number 10 and was told by the gatekeeper: “[o]h, you’re a mathematician, and you’re not getting in”. The gatekeeper closed the door and refused access to Mr. Chesney.
5. I was later allowed into the counting area.
6. I made approximately 6 documented challenges. There was no Republican assisting with duplicating ballots. The poll workers would not accept any of these challenges and would not write them in the book. I asked a poll worker if there was a Republican available. The poll worker said they did not know. I said: “[d]you ask for one?” The poll worker said: “[n]o, you can ask if you want..” Because I didn’t want to be put into a compromising position and risk being ejected from the counting area, I said “[n]o, how about if you ask, I cannot ask.” I believe the poll worker was trying to get me kicked out from the counting area.

7. I observed poll workers entering birthdates of 1-1-1900 while manually entering voters into the system. The computer screen displayed a voter not in precinct alert. The poll worker entered the name anyway.
8. I believe none of my challenges were accepted while I was in the counting area.
9. I observed a Republican military ballot transfer. Poll workers refused to allow an Election Integrity Fund (EIF) challenger and me to view this transfer. All 5 poll workers were crowded around the ballot, blocking our access and refused the challenge. One of the poll workers, very irate, summoned the police to have the EIF challenger ejected. The officer said the EIF challenger was not doing anything wrong. I took the EIF challenger's place and the poll workers deliberately blocked me from viewing. Three poll workers, shoulder to shoulder, had their hands on the ballot at all times. I finally asked supervisor Yolanda to look at the ballot and transfer, and she grudgingly showed it to me.
10. Every time a challenger got ejected from the counting area (as a result of poll workers getting under the challenger's skin, for example), many poll workers cheered, waved, yelled obscenities, etc. Supervisors were waving a red flag as a taunting device and were extending the middle finger to these challengers who were being ejected. The

only challengers I witnessed getting ejected were Republicans and Independents.

Dated: November 8, 2020

Michael J. Cassin n.

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

Michael J. Cassin

Margaret Lear Erle

MICHAEL CASSIN

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

11/08/2020

Notary public, State of Michigan, County of:
My commission expires: *07-22-2026*

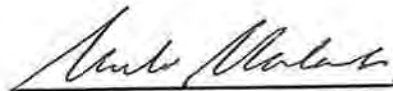
AFFIDAVIT OF MORDECHAI MANDELBAUM

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 Manzelbaum

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

by: *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*

Affidavit of Patricia Rose

State of Michigan

County of Oakland

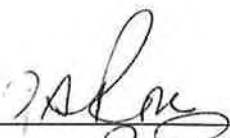
The undersigned, Patricia Rose, being duly sworn, hereby deposes and says:

1. I am over the age of 18, and am a resident and registered voter of the State of Michigan, and
2. I suffer no legal disabilities and have personal knowledge of the facts set forth below.
3. On November 4th, 2020, in response to a request from the Michigan Republican Party, I, along with my husband, Gary T. Rose, volunteered to become Official Election Challengers at the TCF Center in Downtown Detroit to watch the process of handling and counting Absentee Voter Ballots in the 2020 Presidential Race.
4. While randomly observing the Tabulation area, where ballots from the various Precinct Pre-Processing Counting Boards were sent to be tallied, we noticed a female election worker feeding ballots in stacks of about 50, into one of the many Canon scanner tabulators in the area.
5. **The ballot stack she was feeding in kept getting jammed. Rather than stop and go seek the assistance of a supervisor or technical support person, she removed the remaining ballots in the in-feed tray, and kept taking the scanned ballots off the top feed and adding them back to the stack, reinserting the whole stack again, and scanning them in again.**
6. **That process happened 3 times in a row at that one scanner. My husband raised his hand at about the same time as I observed some other Challengers around me raising their hand as well.**
7. **No supervisor came to our aid. We observed her feeding in the same stack a fourth time.**
8. At that point, my husband and I walked down to the center of the long Tabulation area to an elevated platform where the supervisor was likely to be. We located the area supervisor and told him of the problem.
9. **He then summoned a "tech guy" who came and stood next to him. I started describing the problem to the tech guy who stopped me and said he couldn't talk to me. So, I turned a few degrees and addressed these concerns to the supervisor who then repeated those same concerns to the tech guy.**
10. The supervisor asked which tabulator was involved. We walked back down to the area and identified Tabulator ICC#8.
11. Many moments later, the tech guy opened up the top of her tabulator, apparently cleaned or adjusted some parts, closed the top and walked away, as did the Supervisor, with no more words to us. They just walked away.
12. After the batch was tallied by the tabulator, the scanned ballots were rubber banded together with an identifying sheet on the top of the stack and placed into a precinct steel box with a lid on top.
13. I asked the woman if I could have some identifying numbers for that batch because I was concerned about how many times that batch had been put through the tabulator. The numbers

involved were: ICC#8, Batch #50 into Box 38. She showed me the identifying numbers. Then she placed the stack into the box.

14. I observed other batches being rerun at ICC#4: Batch#48, into Box#18; Also, at ICC#4, Batch #44 going into Box #18 and Batch#39 going into Box #18.
15. No technical or supervisory assistance was offered to the election worker at ICC#4, despite the fact that multiple batches had to be re-run through the tabulator.
16. While trying to observe the numbers attached to the batches at ICC#4, I asked the election worker is she could read the numbers to me. At that point, another election worker and 2 Democrat Challengers yelled that I cannot talk to the election worker. So, I took one step forward into the work space to collect the data I needed to identify the batches, the same 3 women pounced on me again verbally and said I was not allowed to get near the election worker either. At that point, other GOP Challengers surrounded me and informed me that I was within my rights to obtain that identifying data. I followed the rules by taking one step into the restricted area, and stepped back out all within one minute's time. I found the comments made by the other election worker and the Democratic challengers to be very hostile and threatening. They were speaking loudly and moving aggressively toward me. I believe they were trying to intimidate me, and mislead me into believing that I could not legally obtain this data. A GOP attorney came to my assistance and told me that I was allowed to do this and that I should fill out an incident report and file it with the Michigan GOP, which I did at about 2:30 pm and left at Room 260 upon my departure.
17. The reasons for re-running the batches of ballots through the tabulator remains unknown to me.
18. At around 2:30, I saw some police officers gathered in front of the entrance door, where other Election Challengers were attempting to get inside to observe the absentee ballot counting process, but they were not let in due to having reached excess capacity from a Covid-19 formula, we were told by police.
19. I asked the police captain that, if my husband and I were allowed to go out, whether they would allow 2 more GOP Challengers to come in, and he said no.
20. We waited until the commotion died down a little bit, signed out, and then left for return home.
21. Both my husband and I could not figure out why the Tabulator operators would rerun the entire batch if there was a jam, instead of immediately calling a technician or supervisor for assistance. They did not request assistance and did not receive any until I requested it for them.

Executed this 6th day of November, 2020.

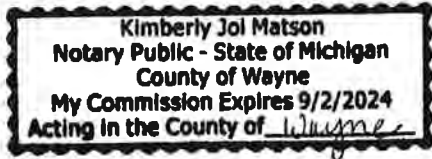
By: 
 Patricia Rose *PS. Rose*
 11/8/2020

NOTARY ACKNOWLEDGEMENT

State of Michigan

County of Wayne

Kimberly J. Matson 11/8/2020
Notary Public



Kimberly J. Matson, Notary
Title and Rank

My commission expires: 9/2/2024