

## AFFIDAVIT

My name is Adam de Angeli and I reside at 11500 Carpenter Road, Apartment 1, Milan, MI 48160.

I registered to become a poll worker for the City of Detroit on September 1, 2020 and again on September 23. I attended poll worker training sessions on October 14 and 15, 2020, and served as a poll worker for the City of Detroit on November 3, 2020.

I have been a Republican Party precinct delegate since 2008. Since getting involved in politics, I have worked on numerous campaigns, serving at various times in every role from volunteer to senior consultant. I have been a campaign manager, treasurer, press secretary, information technology director, and state campaign manager for a presidential campaign. I have been a poll challenger and an election day operations coordinator. I was also a challenger in a recount. I worked in the U.S. House of Representatives as a legislative assistant for more than a year, and in the Michigan House of Representatives as a senior legislative assistant for more than three.

In these capacities I became very familiar with Michigan elections. I was a college freshman when the contentious 2000 presidential election occurred, and as a student of computer science took an early interest in election security.

In this statement I will carefully separate into separate paragraphs my factual eyewitness account of events and my analysis and interpretation of what these facts mean.

### **SECTION 1: Becoming a Detroit Poll Worker**

I first registered as a poll worker for the City of Detroit on September 1, 2020. I remember the date vividly because it was National Poll Worker Recruitment Day and I urged others to do the same on that day. I found the application at the City of Detroit's website at this link<sup>1</sup>:

<https://detroitmi.gov/departments/elections/become-election-day-pollworker>

It included a link to a PDF application, attached as Exhibit A.<sup>2</sup>

Neither the web page nor the application contained an email address or even mailing address where the application was to be submitted, so I called the Department of Elections and asked if there was a way to submit my application electronically. I was told I could apply online at "vote4detroit.net".

Since I was in front of my computer, I accessed the website while still on the phone. There was nothing on the page but a login screen.<sup>3</sup> I advised the elections official that there was no application at the website; nothing but a login screen. He responded: "That's strange. The website was supposed to be open today. Maybe they're still working on it. You can try again tomorrow."

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1 The web page appears to remain unchanged as of November 8, 2020 and the page is archived at <https://web.archive.org/web/20201109030056/https://detroitmi.gov/departments/elections/become-election-day-pollworker>

2 Archived at <https://web.archive.org/web/20201109030318/https://detroitmi.gov/sites/detroitmi.localhost/files/forms/2020-09/%281%29%20POLL%20WORKER%20APPLICATION-2020.pdf>

3 The web page appears to remain unchanged as of November 8, 2020 and the page is archived at <https://web.archive.org/web/20181127073658/https://www.vote4detroit.net/> and is also attached as Exhibit B.

Suspecting that conditions would not change, I drove to the Department of Elections at 2978 W Grand Blvd in Detroit and delivered my application in person. At the Department of Elections there was a man behind a counter and two women speaking with him. The man asked if I was there to apply to be a pollworker; I said yes and presented my application. He took it from me and thanked me. I was in and out of the building in under 15 seconds.

I received no response from the Department of Elections, not even an acknowledgment of receipt.

Having received no response in weeks, I eventually applied to be a poll worker in Oakland County. The County Clerk Department of Elections' website featured a link to the pollworker application. The form included an email address to submit applications. I received prompt acknowledgement of receipt and received a phone call to schedule training within 48 hours of applying.

Three weeks from the date I first applied to be a Detroit poll worker, on September 22, I received an email from a friend indicating that an online registration form was discovered at this address: <https://www.vote4detroit.net/Pollaccess/PollWorkerReg.aspx>

I applied the following day and immediately received the automated email attached as Exhibit C. It included a login link, username, and password.

I opened the link and logged in successfully. The home page displayed top-level tabs: "Home", "Training", "Work Assignment", "Messages", and "Questions/Comments". The "Home" page contained links for "Edit My Personal Information", "View Work History", "Update Username/Password", and "Review Training Materials." The "Review Training Materials" link took me to a page with no training materials (Exhibit F). The "View Work History" page was blank. The "Training" and "Work Assignment" pages were blank. The "Messages" tab contained only one message, identical to the automated email I had received (Exhibit D), and the "Questions/Comments" tab led to a web form for submitting questions and comments.

Essentially, there was no information on the web page.

The first contact I received from the Department of Elections was a phone call on October 13, at 11:38am from the phone number 313-876-0261, identified on my phone's caller ID as "Skalski Anntt". "Is is Adam de Angeli?" a male voice on the other end asked. I affirmed it was. He said he was calling from the Detroit Department of Elections.

"Have you taken your poll worker training?" he asked.

I replied that I hadn't heard from anybody since signing up three weeks ago and wasn't aware of any training.

He said that was OK, there were trainings the next day at 10am, 1pm, 5pm, the same times the following day, and continued mentioning other times when I interjected that 1pm the next would work for me.

I arrived for training the next day, October 14, at Wayne County Community College at 8200 Outer Drive West in Detroit at 1:00pm. I was asked what I was there for, and I responded I was there for poll worker training. They directed me to a room on the third floor; the room number was an even number approximately 324. They did not ask for ID or credentials.

Training began at approximately 1:42pm. As I sat waiting for the training to begin, it occurred to me that it might be wise to record the training, perhaps to listen to it again before Election Day to remind myself of any important information, or perhaps in the event that something peculiar was said. I was acting in an official capacity as a poll worker trainee at a public meeting, and had not received any non-recording notice or signed any non-disclosure agreement, so I saw problem with doing so, and recorded the entirety of the training. I will discuss the content of the training in the next section.

When I arrived home, I logged into the poll worker website. I noticed I had a new message, dated October 13, 2020 01:13pm (95 minutes after the call I had taken the prior morning).

The message was sent from Yvonne Brookins with the subject line “STRIKE TEAM”. (See Exhibit E, my inbox, retrieved 11/8/2020.)

The message contained credentials authorizing me to work as a “SUBSTITUE POLLWORKER” (sic). See Exhibit G)

Under the “Work Assignment” tab, it now stated that my assigned job title was “-EPI”. (Electronic Pollbook Inspector)

I had taken the wrong training: I had attended the standard poll worker training for ballot inspector and ballot box inspector. The Electronic Pollbook Inspector was a different role: The EPI uses the laptop pollbook to process ballot applications and record the issuing of ballots.

At approximately 5:00pm I used the “Questions/Comments” tab to indicate that I had taken the wrong training and asking about returning to take the correct training. Shortly after sending the message, it occurred to me that I might not receive a timely reply. I checked the “Training” tab for a list of upcoming trainings. It displayed approximately ten events coming up in the week ahead, but all of them were listed as “precinct chairperson training”. There were no upcoming EPI trainings listed. I remembered from the phone call that trainings were going to be offered at the same times the next day.

I therefore returned to the same location at 1:00pm on October 15 to take EPI training. The check-in attendant asked if she had seen me the day before. I told her I had taken the wrong training and needed to take EPI training. She directed me to an odd-numbered room, 331 or something close to that.

For the same reasons as before, and having been taken aback by several remarkable statements made in the prior day’s training, I once again audio-recorded the training. I will discuss the content of the training in the next section.

## COMMENTS

- Based on my observations, I conclude that there was no way for a member of the general public could have been reasonably expected to figure out how to even *apply* to become a poll worker.
- A Department of Elections official was unable to direct me to the online application. After providing me a faulty web address, I was either incorrectly or falsely advised that I could simply wait until later before the address would work.
- *To this day* (after Election Day), neither the City of Detroit website or the application home page was ever updated to provide a link to the online application.

- I was *only* able to successfully apply to become a poll worker because I had been given the link to the online application—an unlisted page on an unlisted website—by someone “in the know”. It would have been impossible for a member of the public to discover how to apply without having been given this information, particularly because the Department of Elections staff themselves could not or would not provide me the correct link.
- My first attempt to apply—by hand-delivering a paper application directly to the Department of Elections—appears to have been disregarded, and it was only because I applied online that my application was processed at all.
- It is bizarre and inexplicable why the message providing my work credentials was given the subject line “STRIKE TEAM”.
- None of these anomalies occurred in my attempt to become a poll worker for Oakland County.

## **SECTION 2: Poll Worker Training**

As noted above, I attend two distinct training sessions: first for poll inspector; then for electronic pollbook inspector (EPI). I audio-recorded the trainings; a true and correct copy of the recordings are attached as Exhibits H and I respectively. We were furnished printed packets of training materials. The October 14 training packet is attached in a folder labeled Exhibit J, the October 15 packet is attached in a folder labeled Exhibit K, and a “Check of Operations” document distributed at both trainings is attached in a folder labeled Exhibit L.

The election officials conducting the trainings identified themselves only by their first names. The name of the woman conducting the October 14<sup>th</sup> ballot inspector/ballot box inspector training as she introduced herself was unintelligible to my ear but present on the recording. The two trainers at the EPI training on October 15<sup>th</sup> identified themselves as “Andrea and Miss Tyra”. Andrea was wearing a City of Detroit employee uniform shirt with an embroidered nametag identifying her as “A. Johnson”. Andrea was the check-in attendant for both of the trainings I attended, and spoke for approximately the first 20 minutes of the 10/15 EPI training. Beginning when the lecture turned to usage of the electronic pollbook computers, Miss Tyra took over and lectured for the remainder of the training.

As one would expect, most of the training sessions consisted of basic instructions for performing the jobs we were assigned. There were, however, several instances I found remarkable:

- In both trainings, there were segments relating to poll challengers where the trainers made the point that poll workers could strictly enforce social distancing rules that would prevent challengers from coming within six feet of poll workers. In the April 15 EPI training, Miss Tyra indicated that she was happily aware this would impede poll challengers’ ability to perform their duties.

Beginning at 1:36:30 of Exhibit I, the following exchange occurs:

Miss Tyra: They have to wear a mask and they have to stay six feet. That's important because they can come behind your table, but if you don't have six feet, they can't come back there. [...] Any questions?

Trainee: So if they're six feet back, they can't actually see.

Miss Tyra: Exactly! Unless they got reeeally good vision or they brought their binoculars.

[Laughter]

Election Official: Six feet. That's the rule, right? And you are entitled to your six feet!

Miss Tyra then encouraged pollworkers to “call 9-1-1”, “call the police on ‘em,” and “have ‘em thrown up out of there” if poll challengers become angry and start “making a scene”.

The trainer for the October 14 training, while not actually joking about how social distancing requirements would make it impossible for poll challengers to perform their duties and create a confrontation environment conducive to a law enforcement intervention, nevertheless emphasized that poll workers could strictly enforce social distancing requirements upon poll workers.

Based on this being emphasized at both trainings, it was clear to me that this policy was well-understood and intentionally transmitted to poll workers.

- On October 16, 2020, the Secretary of State issued an updated guidance document that stated:  
  
“Challengers / Poll Watchers: While challengers’ [sic] and poll watchers’ [sic] have their rights and responsibilities established under law, election workers can strictly enforce requirements that they observe proper social distancing.” (“Polling Place Safety and Accessibility”, Michigan Department of State, Bureau of Elections, updated 10/16/2020) I do not know whether this guidance appeared in earlier versions of the document. However, this guidance became the basis for a lawsuit discussed in the next section.
- In both trainings, it was emphasized that, unlike prior elections, they overstaffed and received more applications than they needed. However, it was emphasized that “many” of the Electronic Pollbook Inspectors were minors that would be unable to discharge their duties to accompany the precinct chairperson to the Receiving Board.

In the October 14 training, this was noted in discussion of pay. Trainees were informed that they could make an extra \$50 if they joined the precinct chairperson in delivering the critical election materials—including the poll book, the laptop, the results tapes, tabulator SD cards, and of course, the transfer case containing the ballots-- “but I stress,” the trainer said, “you can only do this if your EPI is a teenager. Many of our EPIs will be teenagers, who can’t work until 2, 3 o’clock in the morning.” She then emphasized, however, that it was a lot of work for little pay: the benefit of being a lowly ballot inspector is that you could go home as soon as the polling place was closed. Those going to the Receiving Board could expect to be there “all night”: 2:00am, 3:00am, or later.

In the October 15 training, this was noted to inform the pubescent boys constituting the majority of trainees that they needed to notify their precinct chairperson early in the day if they were unable to deliver the materials to the Receiving Board (“because it’s late, right?” not said: due to work restrictions on minors). They could be there as late as 1:00am, she warned them.

- Comment: It is incredible that, while on one hand it was so difficult to impossible for members of the public to even find out how to apply, a small army of teenagers was recruited to work the polls, and assigned with particularity to be electronic pollbook inspectors. No explanation was provided as to why this particular duty, which involved staying out late at night to wait in line at

receiving boards, was disproportionately assigned to minors.

- Comment: On both the applications to work for the City of Detroit and Oakland County, applicants were required to list party affiliation. “Independent” or “non-partisan” was not an option. Upon knowledge and belief, clerks are required by law to hire an equal number of Democrat and Republican poll workers. However, Michigan does not have partisan voter registration, so this process is subject only to the affirmation of applicants, and minor employees being ineligible to vote would have no record to check against anyhow.
- Comment: It is remarkable that they were somehow “overstaffed” at the polling places but so understaffed that we were advised that it would take hours waiting in line before the Receiving Board could accept their critical materials—the transfer case, containing the ballots; the poll book, laptop computer, results tapes, and tabulator SD cards.
- In the October 14 training, it was emphasized that, although there would be phone numbers to call for troubleshooting on Election Day, we would be unlikely to get through to anyone. “Honestly speaking,” the trainer said, “it’s going to be hard to get ahold of someone, because there’s going to be 10 people calling us at the same time.” Here again, it was peculiar that some job applicants were apparently turned away, while other jobs were clearly anticipated to be under-staffed.
- In the October 15 training, we were trained to deceive voters that were listed in the poll book as having already voted absentee but who insisted they had not. We were advised to issue them a provisional ballot “to quiet them down” that would not be tabulated but would instead be destroyed by the Department of Elections.

The trainer said the following:

There’s no reason for him to vote again. At all. Ever-- that day. He’s done. But what if he gets what? Loud! Rude!

(impersonating voter) “That’s not me! I didn’t vote! I want to vote!”

And just acts the purest, right? What can you do, besides call your chairperson?

That’s what you should do. Call your chairperson. Your chairperson can issue him what type of ballot?

(Trainees: “Provisional!”)

A provisional envelope! Why?

(“Because he wants to vote.”)

But why a provisional envelope? Where’s it going? Not in the tabulator! It’s going in that envelope, right?

We have how many days? Six!

So what is the Department of Elections going to do with it?

(Throw it out.)

Destroy it! He's already voted.

The people are going to try to test the system. And some of them are going to act the... and 9-1-1 is always an option, right? It's always your first option.

But if they just insist, "that's not me, I didn't do that, I don't know who did that, that's not me" that is an option.

The last resort is to call your chairperson, and have them do the envelope, vote it because that quiets him down, that gets him out, and it doesn't what? It doesn't count. He doesn't know that, does he? Does he?

(No.)

No. He doesn't know that.

- Comment: I do not know what the trainer meant about having "six" days, but this was a clear and specific directive to mislead a voter in the event that the voter was listed as having already voted absentee. While a voter that already voted absentee certainly should not be allowed to vote a second time, it struck me that there was a distinct possibility that an absentee ballot could be have stolen or the system was otherwise incorrect, and the proper procedure would be for all provisional ballots to be carefully reviewed, not simply destroyed. I would think all ballots, including rejected ballots, should not be destroyed in any event.
- In the October 15 training, we were advised of the process for issuing ballots to voters that were not listed in the poll book because they had only registered to vote in the past three days pursuant to the new policy that eligible people could register to vote up to and on Election Day.

According to the training, the voter would "hopefully" have a receipt from the clerk's office indicating that he or she was a newly-registered voter. As shown in the training manual on Page 17, a the receipt would either direct the poll workers to issue a regular ballot, or a challenged ballot. No explanation was given as to why a voter would be given one or the other. The sample receipts shown in the manual did not appear to include security devices of any kind.

- Comment: It struck me that anybody could submit a forged document and be issued a regular ballot, which once inside the tabulator would be anonymous and irrevocably counted. After the training I asked other election officials if this was their policy as well. One township clerk, of Oakland Township, told me that her staff were directed to call the clerk to verify these receipts. My own York Township clerk said she was embossing receipts with the township seal. The Detroit officials gave no indication that any such safeguards would be in place, and indeed, as noted above, we were actually advised that it would be difficult if not impossible to get ahold of a higher-level elections official for any reason.
- The description of the ballot challenge process was bizarre both for what was said and what was unsaid. We were told that challenged ballots were not to be separated into a challenged ballots

envelope, but instead, we were to write the ballot number on the stub onto the ballot itself, cover up the ballot number with white Post-It tape, and feed the ballot into the tabulator. Upon knowledge and belief, this was a statewide policy. Knowing that tabulated ballots are kept in a locked transfer case that is only ever opened in the event of a recount, I concluded that all challenged ballots are presumptively counted and could only be un-counted later in the event of a recount.

- What was *unsaid* in either training was when this should be done, other than in the event described above where a voter presents a late-registration directing us to process it as a challenged ballot. In fact, we were advised in both trainings that poll challengers can challenge a process or challenge a voter's eligibility; however, it was indicated that unless we discovered an error on our part, we were to disregard the challenge and process the voter as normal.

### **SECTION 3: LAWSUIT CHANGES POLL CHALLENGER POLICY**

The statements made at the training events I attended compelled me to share this information with others. I provided the recording to individuals who became plaintiffs in a lawsuit against the Secretary of State and Director of Elections over the poll challenger social distancing requirement.

The case was 20-000211-MZ in the Court of Claims, filed on October 23. An emergency motion for temporary restraining order was heard on Wednesday, October 28. The hearing was published on the Court of Claims' YouTube channel, on the web at <https://www.youtube.com/watch?v=wrosDhuGpYE>

In the short hearing, the parties announced that they had reached a settlement to change the policy to allow for poll challengers to come within six feet of poll workers as needed to perform their duties. The settlement further stipulated that the State would "provide this amended directive to local election officials in a manner most likely to ensure timely receipt". The proposed final order is attached as Exhibit M.

### **SECTION 4: WORKING AT THE POLLS**

On November 2, the day before the election, I logged into the poll worker website to find that I was now assigned to be a ballot box inspector at Precinct 366 located at Henderson Upper School at 16101 Chicago Street in Detroit. I wrote down the location but neglected to record the precinct number, erroneously thinking the street address was sufficient.

When I arrived at the school at 5:45am, I discovered there were polling stations set up for 5 precincts in the room. I located the polling site assessor, Caroline, who was in charge of the entire location. She was too busy to speak to me. There was no sign-in sheet, no list of who was assigned where, and nobody checked my credentials. After standing around uselessly for about 5 minutes, I saw a sign for precinct 374, which sounded right to me, and offered to help them set up. This precinct had two individuals, Eric and Keith, both serving as precinct chairperson for the day. We didn't know why, but didn't mind having additional help. I was the only one in the group assigned to be ballot box inspector, so I performed the job at that location for the entire day. At any rate, no other precinct appeared to be short-staffed.

We were given nametag stickers to wear throughout the day. Some were blue and some were red. While these were possibly intended to distinguish between Democrat and Republican poll workers,



there were no instructions to use them as such, nobody appeared to be aware of the rule and it appeared that coworkers chose them randomly.

The password for the tabulator was the date: "11032020". The passwords we used in our trainings had been the dates of prior elections, e.g. "08042020". I noted that the usage of the most obvious possible password, which was printed on the laminated instruction sheet attached to the tabulator anyway, essentially rendered this security device meaningless.

As we began processing voters, it became immediately obvious that there no concern for voters' privacy, neither from the staff nor the voters themselves. The secrecy sleeves for the ballots were several inches too short for the paper, so I invariably saw the top few lines of every ballot as I tore off the stubs. About halfway through the day, we discussed this and Eric or Keith decided we should re-fold the sleeve to make it cover the front side at the expense of coverage of the back, but ballots were often as not presented to me upside-down, backwards, or outside the sleeve altogether.

On at least three instances, voters would enter another's voting booth to "help" the voter. In two cases it was a wife helping a husband; in another it was a mother helping her daughter.

In the second instance, the husband's ballot was rejected by the tabulator, which refused to accept any ballots with stray marks or incomplete ovals, resulting in the need to spoil the ballot and issue a new one. After having spoiled the ballot, the wife, who had just completed her own ballot, took the husband's new ballot and simply completed the entire ballot for him while he sat at our table.

I asked our precinct chairpersons if it was proper for voters to be in others' voting booths and in that case voting for him. I was advised that family members are permitted to help them vote.

"Isn't that a problem for voter privacy?" I asked. "What if someone is being pressured by a family member to vote a certain way? Isn't the whole point of the privacy of a voting booth that a voter cannot feel pressured to vote a certain way?" They acknowledged I had a point, but were pretty sure about the policy and continued to allow family members to "help" voters at their voting booths.

Almost every voter entering the polling site carried and displayed leaflets, some for individual candidates and others that were "cheat sheet" instructions. We soon discovered they were very frequently left inside the voting booths for the next voter to find, and began checking after each voter to retrieve and throw out the campaign materials. Upon taking my first break, I discovered that there were piles of campaign literature at the window sill in the hallway, in the bathroom, and on the table next to the sanitation station. Outside the entrance, campaign workers were distributing the literature to voters as they entered. Unlike other locations I've worked in prior elections, there was no "100 foot" marking cone to indicate the limit from the entrance where electioneering was allowed. Furthermore, Michigan's election law requires campaign workers to be 100 feet from *all* building entrances, not just the main entrance, and the campaigners were less than 20 feet from another building entrance and 10 feet directly in front of an exit.

I asked my precinct chairpersons about the voters displaying literature? "Isn't that inappropriate?" I asked. "Isn't that no different from a voter displaying a candidate's name and logo on his shirt?" I was advised that it was not inappropriate.

Poll challengers arrived at our precinct at approximately 9:00am. We had received no revised guidance with respect to the 6-foot rule having been amended by the Secretary of State, and nobody seemed to

be aware of it. The poll challengers themselves spent most of the day at the far end of the check-in table, which was less than 6 feet from the wall.

At approximately 3:00pm, our polling site was visited by someone I recognized: Marian Sheridan, the Grassroots Vice Chair of the Michigan Republican Party. With her was an individual with a video camera. I forget his name but remember that he said he was a documentarian working for NBC News. He said he was following Marian but was not “with” her. We chatted briefly about the things I was witnessing. As usual, almost every voter was carrying and displaying campaign literature.

“They are not allowed to do that,” she said. I told her I agreed, but nobody was stopping them. Marian request that the precinct chairperson note in the poll book that most voters were displaying campaign materials inside the polling site, which he did.

Marian and the filmmaker went from precinct to precinct, and before long, some poll challengers confronted them and said they were not allowed to record at the location. The documentarian responded that this rule applied to poll challengers, not to him, and he was certain about that. “It was on Page 8 of the PDF,” he said. The challengers claimed that they could be intimidating voters, although I could not see any voter that appeared the least bit intimidated. They went off to discuss the matter with Caroline. I was too far away to hear the conversation, but it lasted at least 15 minutes. I later mentioned to Marian that the campaigners at the building entrance were in violation of the 100-foot rule. She said she understood, but there was nothing she could do because even if she complained to the polling site assessor they were not going to enforce the rule. She left soon after.

We had at least one instance where a voter was issued a ballot who was not listed in the poll book. When I heard about this, I asked the Electronic Pollbook Inspector what had happened. She indicated that she was able to verify the voter’s eligibility by visiting the Secretary of State website ([mi.gov/vote](http://mi.gov/vote)) on her phone and entering the voter’s information. She represented that the voter was listed on the website as being registered in the precinct, and the voter had told her he or she had voted here previously. She said he was added to the poll book as a registered voter not in poll book, and was given a regular ballot.

After the polls closed at 8:00pm, we began shutting down the precinct and began the process to close the ballot box. This involved connecting a modem to the machine to transmit the results to the city and the county. The machine appeared to connect and transit the results successfully to the Wayne County clerk’s office; however, it repeatedly failed to transmit the results to the City of Detroit. We eventually gave up, reasoning that the tabulator tapes would be delivered to the Receiving Board anyway.

Because I was working at the ballot box, I did not see how many voters throughout the day had been listed as having already been issued absentee ballots. As we closed the poll, I saw what appeared to be about 12 orange slips of paper that were affidavits that the voters did not have absentee ballots to surrender to the polling place, and zero returned absentee ballots.

## COMMENTS

- I was never advised of any updated guidance with respect to poll challenger social distancing rules, and saw no evidence that any of my coworkers had been made aware of the change.
- Poll workers were encouraged to summon the police to expel poll challengers demanding the right to exercise their duties under state law.

- Voters were permitted to display campaign literature inside the polling place seemed improper to me, but nobody did anything to prevent it even after objections were raised.
- The 100-foot rule was not enforced.
- There was no meaningful protection of voter privacy, and no voter seemed to mind.
- 0% of those who had been issued absentee ballots were able to surrender them to the precinct.
- As an aside: Of the 199 people that cast their ballots at our precinct that day, every one of them was able to provide ID. Not one needed to use the affidavit that they were voting without ID.

## CONCLUSION

Michigan voters, and indeed, the American people as a whole, are entitled to free, fair, open, and transparent elections. This is not just for the result of the election itself, but for the American people to have confidence in the result.

The numerous anomalies I witnessed above appear to constitute systemic irregularities so pervasive that it is impossible to know how many ballots were impacted.

These anomalies include:

- Poll workers were trained to strictly enforce social distancing rules upon challengers, encourage to have police expel poll challengers demanding their right to perform their duties, and never advised of the policy being changed as a the result of a subsequent legal settlement. On information and belief, poll challengers were impeded at the polls, at absent voter counting boards, at subsequent Board of Canvassers meetings.
- Poll workers were advised to deceive voters who may have been subject to errors or stolen ballots by issuing fake ballots that would be destroyed by the Department of Elections.
- The poll worker hiring process made it extremely difficult for the general public to apply, and the high propensity of teenagers employed as electronic pollbook inspectors and only electronic pollbook inspectors strongly suggests that poll workers were recruited in unknown but clearly specific and possibly targeted manner.
- Ballot privacy was completely disregarded throughout the precinct on Election Day.
- Prohibitions on electioneering within 100 feet of and inside polling places were completely ignored.
- Approximately 5% of voters had been previously issued absentee ballots and none of these ballots were reclaimed at the polls.
- Workers were trained to add voters to the rolls and issue regular ballots to those that present an unverifiable paper receipt with no security devices.
- Workers were trained to resist the challenging of ballots and even challenged were to be tabulated at the polls, and therefore could not be removed from the total except in the event of a recount.

Certified Fraud Examiners are needed to audit this election. They need to review whether these anomalies demonstrate fraud according to Benford's Law.

Anomalies that occurred in this election were *exactly* the sort of anomalies that were *anticipated in advance*: poll workers being selected from "reliable" sources to prevent a genuine partisan balance of staff, poll challengers being impeded, absentee voters showing up without ballots to surrender, and electioneering taking place inside the polling places.

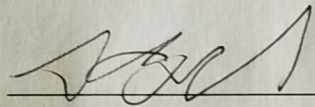
An election could be set aside for widespread anomalies. A re-vote is a simple remedy, no more complex than the runoff election currently happening in Georgia.

If the City of Detroit endeavored to have a fair and open process for a clean election that the public would have every reason to trust, it could hardly have been more incompetent.

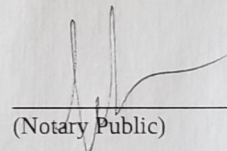
If, however, it endeavored to do everything possible to either corrupt or create the appearance of corruption in its electoral process, it couldn't have been more competent.

Based on this appearance of corruption, I was personally motivated and not in any way pressured to produce this statement.

I, Adam de Angeli, being duly sworn do hereby affirm according to law, depose and say that the facts set forth above are true and correct to the best of my knowledge, information, and belief. I furthermore swear the the audio recordings, photographs of training materials, and captures of web pages are authentic and not manipulated in any way.



Sworn and subscribed before me this 9<sup>th</sup> day of November, 2020.

  
\_\_\_\_\_  
(Notary Public)

SHANE TREJO  
Notary Public, State of Michigan  
County Of Oakland  
My Commission Expires 11-20-2022  
Acting in the County of WASHINGTON