

**STATE OF MICHIGAN
IN THE COURT OF CLAIMS**

DONALD J. TRUMP FOR PRESIDENT
INC., and ERIC OSTERGREN,

Plaintiffs,

v.

Case No. 20-000225-MZ

JOCELYN BENSON, in her official
Capacity as SECRETARY OF STATE

Defendant.

Mark F. (Thor) Hearne, II (P40231)
Stephen S. Davis (*pro hac* pending)
TRUE NORTH LAW, LLC
112 S. Hanley Road, Suite 200
St. Louis, MO 63105
(314) 296-4000
thor@truenorthlawgroup.com

Counsel for Plaintiffs

PLAINTIFFS' NOTICE OF SUPPLEMENTAL EVIDENCE IN SUPPORT OF THEIR COMPLAINT AND MOTION FOR EMERGENCY INJUNCTIVE RELIEF

Donald J. Trump for President, Inc., and Eric Ostergren provide the attached witness statement describing significant, substantial, and severely troubling election irregularities at the TCF Center ballot processing location in Wayne County, Michigan. This affidavit describes how Wayne County election authority workers are changing the date absent voter ballots are received. See **Exhibit A** (Affidavit of Jessica Connarn).

Jessica Connarn's affidavit describes how an election poll worker told Jessica Connarn that the poll worker "was being told to change the date on ballots to reflect that the ballots were received on an earlier date." *Id.* ¶1. Jessica Connarn also provided a photograph of a note handed to her by the poll worker in which the poll worker indicated she (the poll worker) was instructed to change the date ballots were received. *See id.*

The Trump campaign and Eric Ostergren file this notice and the accompanying affidavit and photograph supporting our request that this Court order all counting and processing of absent voter ballots cease until the election authority complies with Michigan law allowing designated challengers to meaningfully observe the election inspectors' processing of the ballots.

Dated: November 4, 2020

Respectfully submitted,

/s/ Mark F. (Thor) Hearne, II
Mark F. (Thor) Hearne, II (P40231)
Stephen S. Davis (*pro hac* pending)
TRUE NORTH LAW, LLC
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Counsel for Plaintiffs

EXHIBIT A

4. I was told to obtain a photo of the poll worker and upon returning to see if the poll worker was still at her location, I noticed the poll worker was moved up on to the adjudication stage where we were not able to communicate with her.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of November, 2020.

Jessica Connarn
JESSICA CONNARN

Subscribed and sworn to before me this 4th day of November, 2020.

Paul Garon
Notary Public

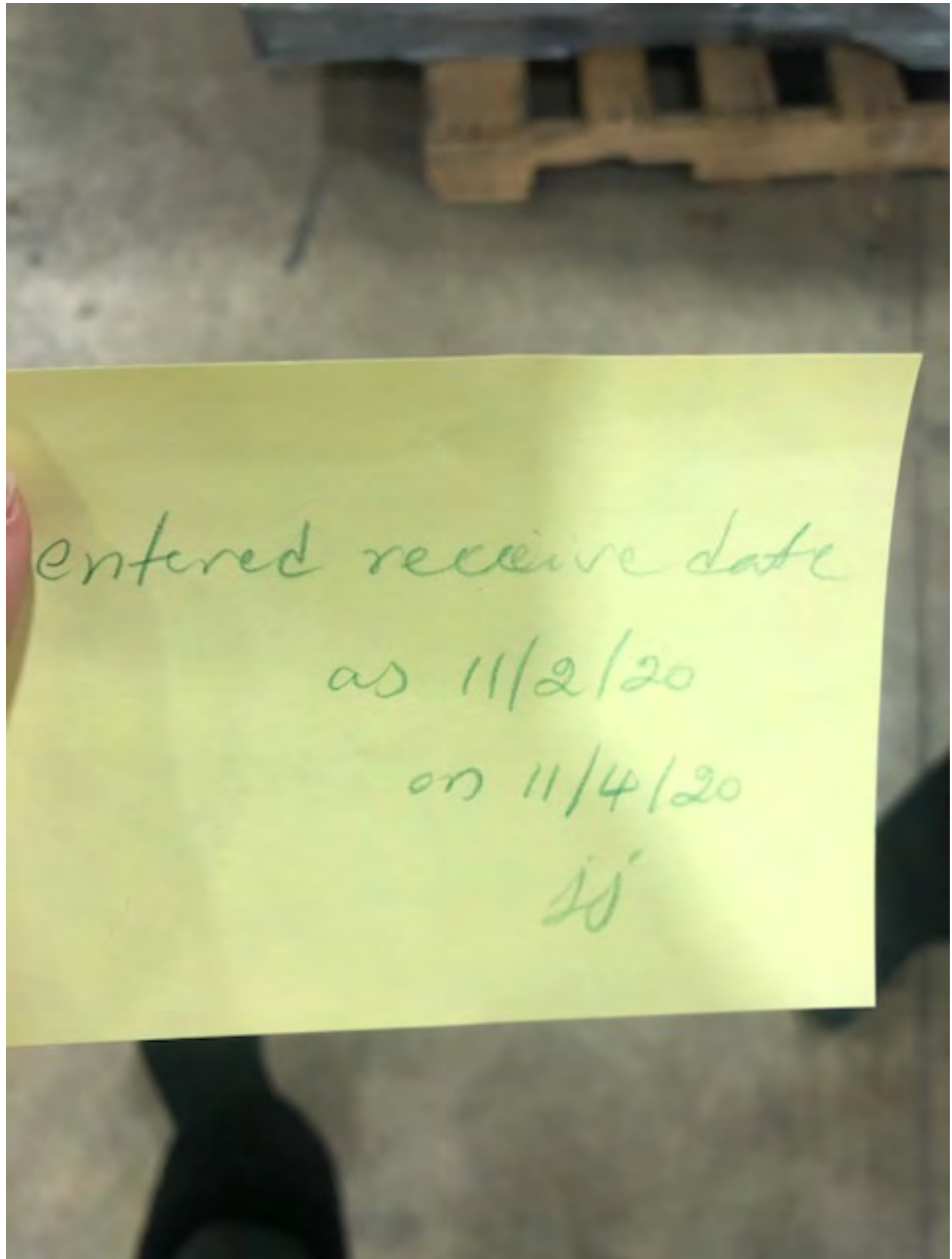
Washtenaw County, Michigan

My Commission Expires:

July 2021

11/4/2020

PAUL GARON



entered receive date
as 11/2/20
on 11/4/20
ij