



STATE OF INDIANA

Indiana Election Division

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To: Members of the Indiana Election Commission

From: J. Bradley King & Angela M. Nussmeyer, IED Co-Directors

Date: December 1, 2022

In Re: Combined State Voter Registration and HAVA Grievance (2022-08), Jones (Tippecanoe County)

Background

The administrative complaint procedures concerning the uniform and nondiscriminatory election technology and administrative requirements under Title III of the Help America Vote Act (HAVA) can be found generally in Indiana Code 3-6-4.5 and the complaint procedure is required by 52 USC 21112. Additionally, the administrative complaint procedures concerning the National Voter Registration Act (NVRA) and the state voter registration law can be found general in Indiana Code 3-7-11.

In part, Title III of HAVA centers on voting system standards, statewide voter registration system standards, provisional ballot voting, and additional requirements for first time voters who register to vote by mail. (52 USC sec. 21081 through 21085) For example, Title III of HAVA requires that voting systems meet minimum requirements to be used in a federal election and that states implement a statewide computerized voter registration list, like Indiana's statewide voter registration system. It also sets forth the standards for residency documentation for first time voters who register to vote by mail and providing and processing provisional ballots, including a requirement for states to develop a free access system to determine the outcome of the voter's provisional status.

HAVA Complaint Procedures

A person who believes there is a violation of any provision of Title III of HAVA, including a violation that has occurred, is occurring, or is about to occur, may file a complaint with the Indiana Election Division (IED). (IC 3-6-4.5-6) The complaint filed must be written, signed, and sworn before an individual authorized to administer an oath under Indiana state law. (IC 3-6-4.5-7)

The complaint must state the following:

- 1) The name and mailing address of the person alleged to be committing the violation of Title III described in the complaint;
- 2) Whether the person filing the complaint has filed a complaint concerning the violation with a county election board under their HAVA procedures found in IC 3-6-5.1; and
- 3) The nature of the injury suffered (or about to be suffered) by the person filing the complaint.

IED shall determine whether a complaint filed describes a violation of Title III if the facts set forth in the complaint are assumed to be true. If IED determines that (1) even if the facts set forth in the complaint

are assumed to be true, there is no violation of Title III; or (2) the person has not filed a sworn statement as required by IC 3-6-4.5-7, then IED shall dismiss the complaint and publish the order dismissing the matter in the Indiana Register. (IC 3-6-4.5-13) Additionally, a copy of the determination shall be sent by certified mail to the person who filed the notice; the person alleged to have committed the violation; the members of the commission; and the attorney general. (IC 3-6-4.5-14)

Alternatively, if IED determines that the complaint alleges a violation of Title III if the facts alleged in the complaint are assumed to be true and that the person has filed a sworn statement, IED shall conduct an investigation under IC 3-6-4.2 and shall submit the results of the investigation to the Indiana Election Commission (IEC). (IC 3-6-4.5-15, IC 3-6-4.5-16) The IEC shall then issue a written report based on those findings. (IC 3-6-4.5-16)

The report must contain the following information pursuant to IC 3-6-4.5-17:

- 1) indicate the date when the complaint alleging the violation was received by the election division;
- 2) contain findings of fact regarding the alleged violation and state whether a violation of Title III has occurred, or appeared to be likely to occur when the complaint was filed;
- 3) state what steps, if any, the person alleged to have committed the violation has taken to correct the violation or to prevent a reoccurrence of the violation;
- 4) suggest any additional measures that could be taken to correct a violation;
- 5) indicate the date when a violation was corrected or is expected to be corrected; and
- 6) provide any additional information or recommendations useful in resolving this complaint.

IED shall provide a copy of the IEC report by certified mail to (1) the person who filed the complaint; (2) the person alleged to have committed the violation; (3) the members of the commission; and (4) the attorney general.

NVRA or State Voter Registration Complaint Procedures

A person who has been aggrieved by a violation of the NVRA or the state voter registration law (IC 3-7), may file a complaint with the co-directors of Indiana Election Division (IED), who serve as the NVRA officials for state. (IC 3-7-11-3) The complaint filed must be written. (IC 3-7-11-3)

The complaint must state what under the NVRA or the state's voter registration law has been violated.

IED shall determine whether a complaint filed describes a violation of the NVRA or the state voter registration law if the facts set forth in the complaint are assumed to be true. If IED determines that even if the facts set forth in the complaint are assumed to be true, there is no violation of either the NVRA or the state voter registration law, then IED shall provide a copy of the determination by certified mail to (1) the person who filed the complaint; (2) the person alleged to have committed the violation; (3) the member of the commission; and (4) the attorney general. (IC 3-7-11-5)

Alternatively, if IED determines that the complaint alleges a violation of the NVRA or the state voter registration law if the facts alleged in the complaint are assumed to be true, IED shall conduct an investigation under IC 3-6-4.2 and shall submit the results of the investigation to the Indiana Election Commission (IEC). (IC 3-7-11-7) The IEC shall then issue a written report based on those findings. (IC 3-7-11-7 and IC 3-7-11-8)

The report must contain the following information pursuant to IEC 3-7-11-8:

- 1) indicate the date when the notice alleging the violation was received by IED;
- 2) contain findings of fact regarding the alleged violation of NVRA or the state voter registration law and state whether a violation of NVRA or the state voter registration law appears to have occurred;
- 3) state what steps, if any, the person alleged to have committed the violation has taken to correct a violation or to prevent a reoccurrence of a violation;
- 4) suggest any additional measures that could be taken to correct a violation;
- 5) indicate the date when a violation was corrected or is expected to be corrected; and
- 6) indicate the number of days remaining after the issuance of the IEC report until the next election will be conducted:
 - (A) for a federal office in the jurisdiction where the violation is alleged to have occurred if the notice alleges a violation of NVRA; or
 - (B) for any other office or on any public question if the notice alleges a violation of this article.

IED shall provide a copy of the IEC report by certified mail to (1) the person who filed the complaint; (2) the person alleged to have committed the violation; (3) the members of the commission; and (4) the attorney general.

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Indiana Election Commission Report on State Voter Registration Law Complaint and HAVA Grievance 2022-08 – Jones (Tippecanoe County)

Section 1: State Voter Registration Law Complaint & HAVA Grievance 2022-08

Ken Jones and Julia Vaughn (complainants) filed a state voter registration law complaint on July 25, 2022, and subsequently filed a Help America Vote Act (HAVA) Grievance with the Indiana Election Division on August 8, 2022. A copy of complaint and the HAVA grievance sworn statement (Cause No. 2022-08) is found in Exhibit A and B.

Federal and state law require a first-time voter in Indiana who registers to vote by mail to provide proof of residency prior to voting. However, a first-time voter whose registration form is submitted by hand delivery or through alternative delivery methods such as the state online voter registration application or registration through a full-service agency does not need to provide proof of residency documentation. A summary of how this federal and state law applies in Indiana is provided in the latest edition of the Indiana Voter Registration Guidebook. This summary is provided in Exhibit K. Mr. Jones and Ms. Vaughn allege that the Tippecanoe County Board of Elections and Registrations (Board) incorrectly applied the proof of residency requirement to voter registration forms that were hand-delivered to the Board.

The co-directors met to discuss the grievance, which alleges a violation of the additional residency documentation requirement found in IC 3-7-33-4.5 and 52 U.S.C. §21083(b) by the Board.

The complaint alleges the Board has been applying the requirement to individuals whose voter registration applications was not submitted by mail and that this “appears to have resulted in at least one newly registered voter whose paper voter registration form was hand-delivered to be required to cast a provisional ballot, that was not counted. At its May 13, 2022 meeting, the Board refused to open and count a voter's provisional ballot, apparently solely because the voter did not produce the proof of residency required of first-time voters who submit their form by mail, in spite of the fact that this voter did not in fact submit their registration application by mail.”

The co-directors sent letters to the Tippecanoe County Board of Elections and Registration and employees of the Board, Germany Harris and Juan Ramirez, requesting information about their voter registration practices and to respond the complaint. A copy of the letters sent on August 8, 2022, to the Board and their employees are found in Exhibit C.

Section 2: Findings of Fact

On August 5, 2022, before IED made an official request for a response from the Board, Julie A. Roush, Tippecanoe County Circuit Court Clerk and member of the Board of Elections and Registration, sent a memo to IED to “provide some background on the process used when the BER [board of elections and registration] receives a voter registration application hand-delivered by a third party on behalf of a first-time voter.” (Exhibit D) In that memo, Clerk Roush stated:

“Upon review of our process, neither a third-party delivered voter registration application nor a USPS delivered registration application is flagged as needing additional proof of residence. In

other words, while previous correspondence has indicated a theoretical belief that third-party delivered registrations should be treated the same as USPS delivered registrations (and other applications received by "mail" such as Federal Express or non-USPS couriers); the actual practice has been not to flag any of those registrations as needing additional documentation. Rather, the BER has checked the Driver's License Number or Social Security information provided on the registration application (whether delivered by third party or by USPS) against the data base in SVRS. If that check matches the applicant to the number, the BER processes the registration as complete. If the check does not match the applicant to the number, regardless of the manner of delivery, the BER conducts follow up to determine the cause of the mismatch. "The BER will attempt to contact the applicant by mail and by phone (if applicable) in order to obtain or correct a missing or incorrect SSN or DLN. If the BER is not able to obtain correct information, the registration is assigned a voter ID number and processed before the next election. (According to INSVRS Help Desk, there is no flag in SVRS that states "proof of residence is needed". The only flag available is, "Verify ID".) By clicking on the DLN/SSN Match in the system, no flag will be added to the voter's registration.

"It should be noted that there was a period of time in February and March of 2022 a member of the BER staff thought all third-party and USPS delivered applications were automatically marked as needing additional proof of residency and shared this incorrect information with a member of the League of Women Voters. In March, it was explained to the staff member that the system does not automatically require proof of residency, especially when there is an SSN or DLN match. The conversation with the League seems to have been triggered by forms of voter registration that had been modified from the federal form such that the portion that states "If you are registering to vote for the first time please refer to the application instructions on submitting copies of identification documents with this form" had been partially cut off along with the sections below that statement. Additionally, Box 6 of the federal form had been modified to add text that says "Last 4 digits of SSN, IN Driver's License# or IN State ID." (See attachments). The outcome of this alteration was the BER staff had to contact registrants to retrieve all 10 digits of their Indiana ID numbers in order to register the new voters. However, this did not result in any applicant's registration being incorrectly flagged.

"It appears our manner of processing applications received via USPS is more permissive than the law requires, however, as relevant to the LWV complaint, our manner of processing applications received via third party is not more restrictive than permitted under IC 3-7-33-4.5, IC 3-7-22-9, or NVRA."

On September 6, 2022, the Board, through attorney Douglas J. Masson, responded to the complaint. (Exhibit E) Republican board member Randall Vonderheide and Democratic board member E. Kent Moore, gave a similar response to the complaint:

Randall Vonderheide stated:

"The Complaint alleges that, on May 13, 2022, the Board rejected a voter's provisional ballot due to a failure by the voter to provide residency documentation. This is not accurate. No ballots were rejected at the May 13, 2022, meeting for failure to provide residency documentation. As reflected in the County Election Board Findings, two of the rejected provisional ballots attached to the Complaint at Exhibit E were rejected for the individual's

failure to produce a valid form of voter identification and one was rejected because the voter abandoned the polling place to pursue the option of a write in candidate. Furthermore, I am unaware of ballots having been rejected by the Board at any other time for failure to provide residency documentation.

“During my tenure as Board member, the Board has not adopted a local policy requiring first time voters whose voter registration application is delivered by third-parties other than the United States Postal Service to provide additional documentation under IC 3-7-33-4.5. I do not believe the Board has adopted such a policy.

In my capacity as President of the Board, I have inquired about the allegations in the Complaint. The Complaint references a time frame dating back to 2018. Upon information and belief, since 2018, no applications for registration have been rejected for failure to provide the additional residency documentation complained of. I do not believe any registration applications delivered by third parties have resulted in the voter being flagged in our computerized systems as being required to provide additional residency documentation as a condition of voting. I have been provided with a copy of the County's "Proof of Residency Report" dated August 1, 2022. It reflects one entry since 2018, and I have been advised that this entry is from a voter whose registration application was submitted via the United States Postal Service.”

E. Kent Moore stated:

“The Complaint alleges that, on May 13, 2022, the Board rejected a voter's provisional ballot due to a failure by the voter to provide residency documentation. This is not accurate. No ballots were rejected at the May 13, 2022, meeting for failure to provide residency documentation. As reflected in the County Election Board Findings, two of the rejected provisional ballots attached to the Complaint at Exhibit E were rejected for the individual's failure to produce a valid form of voter identification and one was rejected because the voter abandoned the polling place to pursue the option of a write in candidate. Furthermore, I am unaware of ballots having been rejected by the Board at any other time for failure to provide residency documentation.

“During my tenure as Board member, the Board has not adopted a local policy requiring first time voters whose voter registration application is delivered by third-parties other than the United States Postal Service to provide additional documentation under IC 3-7-33-4.5. I do not believe the Board has adopted such a policy.”

Clerk Roush’s response both to the allegation in the complaint about a voter being asked to cast a provisional ballot and made a correction to part of her statement in the August 5th memo. Clerk Roush stated:

“The Complaint alleges that, on May 13, 2022, the Board rejected a voter's provisional ballot due to a failure by the voter to provide residency documentation. This is not accurate. No ballots were rejected at the May 13, 2022, meeting for failure to provide residency documentation. As reflected in the County Election Board Findings, two of the rejected provisional ballots attached to the Complaint at Exhibit E were rejected for the individual's failure to produce a valid form of voter identification and one was rejected because the voter

abandoned the polling place to pursue the option of a write in candidate. Furthermore, I am unaware of ballots having been rejected by the Board at any other time for failure to provide residency documentation.

“On August 5, 2022, I submitted a memorandum to the Indiana Election Division which is attached hereto as an Exhibit. I believe the information in the Memorandum to be true and correct subject to the following corrections:

a. The modified federal forms received in our office from LWVGL representatives had not been cut off. The partially cut off information at the bottom edge of the form was a function of how the form is scanned in our office. However, Box 6 of the federal forms were modified to say "Last 4 digits of SSN, IN Driver's License t# or IN State ID." On August 22, 2022, our office received a federal form with a revised modification to Box 6 that now includes the text "Last 4 digits of Social Security Number."

b. Further review of the "Proof of Residency Report" reveals that there was no voter in the list registered in 2020. Only one voter registered in 2018 or after appears on the list, a voter who registered in 2022 whose voter registration application was received via the United States Postal Service and who was registered on May 24, 2022.”

Board employee Juan Ramirez provided in his response that based on a report he pulled on August 1, 2022, listing each registered voter who was tagged as requiring additional proof of residency, he only found one person who was registered since 2018 that was flagged as requiring to provide additional proof of residency. Mr. Ramirez’s response also explained how they process paper voter registration applications:

“When our office receives paper registration applications, whether hand delivered or via the United States Postal Service (USPS), our practice is to verify the applicant's Social Security Number, Indiana Driver's License Number, or Indiana Identification Number (unless the applicant indicates that he or she does not have any of those.) Where those numbers do not match an existing record, the application is treated as incomplete and our office initiates efforts to contact the applicant by telephone, mail, and/or email depending on what contact information the applicant has provided. (See VRG 1.3). An Incomplete Registration could also arise from the applicant's failure to provide other required information (e.g. residence address, date of birth, statement of citizenship, and signature.)

“No registration application has been rejected for failure to provide additional proof of residency, and as reflected in the "Proof of Residency Report," the only applicant registered after 2018 who is flagged as being required to provide additional residency documentation under IC 3-7-33- 4.5 is an individual whose application was received through the United States Postal Service. I was present in the office during a meeting between Germany Harris and Ken Jones, however, I was working on a different project at the time and did not hear the specifics of that discussion. In general, however, I am aware of exchanges between Germany Harris of this office, LWVGL, and the IED with respect to the proper interpretation of IC 3-7-33-4.5 and IC 3-7-22-9. Regardless of the arguments raised in that exchange, absent a change in the statutes or new guidance from IED, neither I nor this office intend to flag future applications received via a

person presenting the form on behalf of another individual as requiring additional residency documentation under IC 3-7-33-4.5.”

On the allegation that a voter was issued a provisional ballot which was improperly rejected, he stated:

“The Complaint alleges that, on May 13, 2022, the Tippecanoe County Board of Election and Registration rejected a voter's provisional ballot due to a failure by the voter to provide residency documentation. This is not accurate. No ballots were rejected at the May 13, 2022, meeting for failure to provide residency documentation. As reflected in the County Election Board Findings, two of the rejected provisional ballots attached to the Complaint at Exhibit E were rejected for the individual's failure to produce a valid form of voter identification and one was rejected because the voter abandoned the polling place to pursue the option of a write in candidate. Furthermore, I am unaware of ballots having been rejected by the Board at any other time for failure to provide residency documentation.”

Board employee Germany Harris provided in his response that based on a report he pulled on August 1, 2022, listing each registered voter who was tagged as requiring additional proof of residency, he only found one person who was registered since 2018 that was flagged as requiring to provide additional proof of residency. Mr. Harris’s response also explained how they process paper voter registration applications:

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“I believe the confusion in this case arose out of conversations between myself and Ken Jones of the League of Women Voters of Greater Lafayette. It is common for LWVGL to submit voter registration applications on versions of the federal Voter Registration Application that have been modified. Exhibit B contains two versions of this modified form. Prior to the Complaint, Box 6 of the form was modified to add the text "Last four digits SSN or Indiana DL or ID Number." This added text caused confusion in that applicants would, for example, supply only four digits of their driver's license. (A revised, but still modified, version of the federal form was submitted on August 22, 2022, with the added text reading "Last 4 digits of Social Security Number" which remains problematic in that the Indiana Driver's License Number or ID Number is also permissible.)

“In the course of discussions with Mr. Jones on how to ensure fewer Incomplete Registrations were submitted to our office, I shared with him two forms generated when a registration is incomplete. One page is a "voter registration application notice of disposition" with a box for, among other things, "the following information was incomplete or missing from your application." Our office adds a notation indicating specifically what information was missing. The

other form generated that I shared with Mr. Jones is a letter that discusses registration by mail and the need to provide a personal identification document for the individual's ballot to be counted in the next election. However, it is important to note: a) this is not sent to every individual with an incomplete registration; b) it specifies as one of the available exemptions "I did not register to vote by mailing a voter registration application to your office," and c) as the Proof of Residency Report confirms, individuals who register by third-party hand-delivery are not being flagged as requiring proof of residency.

"The complaint contains exchanges, in chronological order, from:

- a. February 8, 2022, at 11:32 a.m. (Exhibit A-Email from Brad King to Ken Jones),
- b. March 10, 2022, at 4:19 a.m. (Exhibit D - email from Valerie Warycha/Brad King to Ken Jones),
- c. March 10, 2022, at 11:00 a.m. (Exhibit E - email from Angela Nussmeyer to Ken Jones),
- d. March 10, 2022 at 11:10 a.m. (Exhibit B - email from Germany Harris to IED), and
- e. March 10, 2022, at 11:31 a.m. (Exhibit C - email from Angela Nussmeyer to me).

The emails from me reflect my reading of IC 3-7-33-4.5(a)(i) stating that the section applies to an individual who "submits an application to register to vote by mail under IC 3-7-22," suggesting that IC 3-7-22 modifies the common understanding of "mail" in some fashion; combined with IC 3-7-22-9 discussing three ways a "registration by mail form" might be received. However, particularly after the exchange with the IED in March 2022, I understand and accept that IED reads the statutes differently. No registration application has been rejected for failure to provide additional proof of residency, and as reflected in the "Proof of Residency Report," the only applicant registered after 2018 who is flagged as being required to provide additional residency documentation under IC 3-7-33-4.5 is an individual whose application was received through the United States Postal Service. Neither I nor this office intend to flag future applications received via a person presenting the form on behalf of another individual as requiring additional residency documentation under IC 3-7-33-4.5."

Mr. Harris also provided the same response as Mr. Ramirez regarding the provisional ballot issue raised in the complaint.

Under Title III of HAVA, specifically 52 U.S.C § 21083(b)(1), the law requires that:

"a State shall, in a uniform and nondiscriminatory manner, require an individual to meet the requirements of paragraph (2) if—

- (A) the individual registered to vote in a jurisdiction by mail; and
- (B)(i) the individual has not previously voted in an election for Federal office in the State; or
- (ii) the individual has not previously voted in such an election in the jurisdiction and the jurisdiction is located in a State that does not have a computerized list that complies with the requirements of subsection (a).

Paragraph (2) of the section states:

“(A) In general

An individual meets the requirements of this paragraph if the individual—

(i) in the case of an individual who votes in person—

(I) presents to the appropriate State or local election official a current and valid photo identification; or

(II) presents to the appropriate State or local election official a copy of a current utility bill, bank statement, government check, paycheck, or other government document that shows the name and address of the voter; or

(ii) in the case of an individual who votes by mail, submits with the ballot—

(I) a copy of a current and valid photo identification; or

(II) a copy of a current utility bill, bank statement, government check, paycheck, or other government document that shows the name and address of the voter.

“(B) Fail-safe voting

“(i) In person

An individual who desires to vote in person, but who does not meet the requirements of subparagraph (A)(i), may cast a provisional ballot under section 21082(a) of this title.

“(ii) By mail

An individual who desires to vote by mail but who does not meet the requirements of subparagraph (A)(ii) may cast such a ballot by mail and the ballot shall be counted as a provisional ballot in accordance with section 21082(a) of this title.”

Under paragraph (3), the section provides for certain cases where the additional residency documentation does not apply to a person:

“(A) who registers to vote by mail under section 6 of the National Voter Registration Act of 1993 (42 U.S.C. 1973gg-4) [now 52 U.S.C. 20505] and submits as part of such registration either—

(i) a copy of a current and valid photo identification; or

(ii) a copy of a current utility bill, bank statement, government check, paycheck, or government document that shows the name and address of the voter;

“(B)(i) who registers to vote by mail under section 6 of the National Voter Registration Act of 1993 (42 U.S.C. 1973gg-4) [now 52 U.S.C. 20505] and submits with such registration either—

(I) a driver's license number; or

(II) at least the last 4 digits of the individual's social security number; and

(ii) with respect to whom a State or local election official matches the information submitted under clause (i) with an existing State identification record bearing the same number, name and date of birth as provided in such registration; or

“(C) who is—

(i) entitled to vote by absentee ballot under the Uniformed and Overseas Citizens Absentee Voting Act [52 U.S.C. 20301 et seq.];

(ii) provided the right to vote otherwise than in person under section 20102(b)(2)(B)(ii) of this title; or

(iii) entitled to vote otherwise than in person under any other Federal law.”

This HAVA additional residency documentation requirement was enacted by the Indiana General Assembly into the state voter registration law under IC 3-7-33-4.5:

- “Sec. 4.5. (a) Except as provided in subsection (b), this section applies to an individual who:
- (1) submits an application to register to vote by mail under IC 3-7-22; and
 - (2) has not previously voted in:
 - (A) a general election in Indiana (or a special election for federal office in Indiana); or
 - (B) a general election (or a special election for federal office) in the county where the individual has submitted an application under this chapter if the application was received by the county voter registration office after December 31, 2002, and before January 1, 2006.
- (b) This section does not apply to an individual who complies with the requirements in any of the following:
- (1) The individual submits an application to register to vote by mail under this chapter and includes with that mailing a copy of:
 - (A) a current and valid photo identification; or
 - (B) a current utility bill, bank statement, government check, paycheck, or government document; that shows the name and residence address of the voter stated on the voter registration application.
 - (2) The individual submits an application to register to vote by mail under this chapter that includes:
 - (A) the individual's Indiana driver's license number; or
 - (B) the last four (4) digits of the individual's Social Security number;and the county voter registration office or election division matches the information submitted by the applicant with an existing Indiana identification record bearing the same number, name, and date of birth set forth in the voter registration application.
 - (3) The individual is an absent uniformed services voter or overseas voter.
 - (4) The individual is entitled to vote other than in person under the federal Voting Accessibility for the Elderly and Handicapped Act (52 U.S.C. 20102(b)(2)(B)(ii)) due to a determination by the election division that a permanent or temporarily accessible polling place cannot be provided for the individual.
 - (5) The individual is entitled to vote other than in person under any other federal law.
- (c) When a county voter registration office receives a voter registration application by mail, the office shall determine whether the applicant is subject to the requirements to provide additional documentation under this section and 52 U.S.C. 21083.
- (d) As required by 52 U.S.C. 21083, a county voter registration office shall administer the requirements of this section in a uniform and nondiscriminatory manner.
- (e) If the county voter registration office determines that the applicant:
- (1) is not required to submit additional documentation under this section; or
 - (2) has provided the documentation required under this section;
- the county voter registration office shall process the application in accordance with section 5 of this chapter.
- (f) If the county voter registration office determines that the applicant is required to submit additional documentation under this section and 52 U.S.C. 21083, the office shall process the application under section 5 of this chapter and, if the applicant is otherwise eligible to vote, add the information concerning this documentation to the voter's computerized registration entry under IC 3-7-27-20.2.
- (g) The county voter registration office shall remove the notation described in subsection (f) after the voter votes in an election for a federal office.”

After reviewing the responses from the Board and consultation among the co-directors, Co-Director Angie Nussmeyer requested a copy of the challenge affidavits and provisional forms (PRE-4/PRO-2) that were issued to each voter who completed a provisional ballot during the May 3, 2022 primary election. After Co-Directors J. Bradley King and Angie Nussmeyer reviewed affidavits and forms provided by the Board, it appears to the Co-Directors that none of the voters who completed a provisional ballot did so because they were being required by the Board to present additional residency documentation. The affidavits and forms are in Exhibit F.

Co-Directors King and Nussmeyer also reviewed the SVRS report "Proof of Residency" provided by Mr. Ramirez and Mr. Harris and Clerk Roush regarding voters in Tippecanoe County who had a "verify ID" flag present on their voter registration that would require that voter to present additional residency documentation. After reviewing the report provided by the county and speaking with Civix, the vendor who maintains SVRS on behalf of the state of Indiana, it was confirmed that the report generated by SVRS only contains voters whose registration is currently marked with the "verify ID" flag as of the date the report is generated. As previously noted, "verify ID" flags on a voter's registration record that would require the voter to present additional residency documentation to cast their ballot.

Co-Director Nussmeyer then requested from Civix a list of Tippecanoe County voters who had a "Verify ID" flag attached to their record in SVRS at any time during the first quarter of 2022, even if the "verify ID" flag was subsequently removed. (Exhibit G) This list contains many more voters than what was provided in the report from Clerk Roush, Mr. Ramirez, and Mr. Harris.

Co-Director Nussmeyer then conducted research for each voter listed in the Civix report found in Exhibit G. Seven voters had "walk-in" as the submission method (that is, how the form was delivered to the office) but "yes" was noted if the registration form was received by mail:

Vinay Jagan
Lanna Johson
Ella Chianis
Denise Jacome
Chase Johnson
Alexander Wells
Eric Zschiedrich

When "yes" is marked to note the registration was "received by mail" and the person is a first-time voter, SVRS recognizes this combination to automatically add the "verify ID" flag that would require the voter to provide proof of residency documentation. These seven voters appear to have had the "verify ID" flag misapplied to their registration, if the submission method of "walk-in" was correctly selected by the Board when entering the voter's registration request. In other words, a hand-delivered registration form (that is, walk-in as the submission method notation) should not be marked "yes" as received by mail.

In the view of Co-Director Nussmeyer, each of these entries appear to be a violation of the HAVA, as a first-time voter would only be required to present additional proof of residency if their registration had been mailed. In these seven instances, it appears the registrations were hand-delivered based on the submission method of "walk-in."

Reymarie Maborang had a “verify ID” flag on her registration record, which was lifted when it appears her registration may have been updated at the BMV. However, there is no document attached to her record in SVRS to support the BMV submission. This may be a data entry error by the county when overriding the allegedly misapplied “verify ID” flag. It is unclear whether the “verify ID” flag was misapplied to the registration record based on the conflicting data points on her record.

It appears that most, if not all, of the registration records in Exhibit G had the “verify ID” flag removed by the Board in March 2022. However, it is unclear whether this was done because the voter provided additional proof of residency documentation or the Board took corrective action when originally learning of the issue and receiving feedback from the Indiana Election Division co-directors. Co-Director King notes that there is no evidence that any of these voters provided additional proof of residency documentation since no copies of such documents are to be found in any voter’s registration record. Instead, Co-Director King believes that the evidence is clear that the Board promptly took corrective action upon learning of the issue and receiving information from the Co-Directors.

Further, the SVRS data entries appear to have some inaccuracies based on review of the documents available within the system. For example, one record contains information that the voter registration application was completed at the BMV during a credential transaction, but it was marked as being received by mail. BMV registrations are sent electronically to county users and paper copies would not be sent by mail to the county pursuant to state law. Several entries had dates that did not align to the dates on the documents contained within the system or the wrong form type may have been selected to associate to the entry made in the system.

Additionally, several documents had the hallmark appearance of the federal form used by the League of Women Voters as documented by Clerk Roush, who noted that additional text to direct voters to enter their Indiana driver’s license number or last four of SSN was added to the form. (See Exhibit D) While it is possible those forms were, in fact, mailed into the county (submission method) and noted as “yes” to the received by mail prompt, the information contained in the complaint indicates the registration forms used at the League’s registration drives were generally hand-delivered.

After this review, and consultation among the co-directors, the election division sent the Board, through their counsel Mr. Masson, several follow up questions from Co-Director Nussmeyer. (Exhibit I) Mr. Masson did follow up to ask how many of the voter records Co-Director Nussmeyer reviewed did she see if the Verify ID flag was presently on the voter’s record. Co-General Counsel Matthew Kochevar, replying on behalf of the Co-Director Nussmeyer, answered Mr. Masson’s question in that, save one record, the Verify ID flag was not present in the voter records that were reviewed. As of the date of this report, none of the Board have replied to the follow up questions raised by Co-Director Nussmeyer.

Based upon the review of the information and records provided by the complainants, the Board, and records contained in SVRS, the co-directors of the Indiana Election Division have determined, that at least up to March 2022, the facts alleged in the complaint are true and a violation of Title III of HAVA and the state voter registration law, specifically IC 3-7-33-4.5, by one or more of the employees of the Tippecanoe County Board of Elections and Registration did occur. However, there is no evidence that the Board itself, acting under IC 3-6-5.4, authorized or directed the activity that led to the violation and there is no evidence that any individual was ultimately prevented from registering to vote or casting a regular official ballot if the voter chose to do so. Further, as of the date of this report and to the best of

the Division's knowledge, the Board's staff has cured these violations and no further violations have occurred.

Section 3: Corrective Action Made by the Board

Based on the voter registration information reviewed by Co-Directors King and Nussmeyer in Exhibit G, it appears that the Tippecanoe County Board of Elections and Registration promptly took corrective action to cure the violations in March 2022. After review of the Proof of Residency report provided by the Board, the voters with the "verify ID" flag on their record as of the date of that report appear to have the "verify ID" flag appropriately applied to first time voters that registered to vote by mail. However, only the paper records maintained by the county could confirm the data entry in the system was entered accurately.

Section 4: Additional Recommended Actions

The Indiana Election Commission recommends the Tippecanoe County Board of Elections and Registration take the following corrective actions:

- Update training materials and guidance to board staff on which individuals are subject to the HAVA additional residency documentation required under 52 U.S.C. §21083 and IC 3-7-33-4.5, which may include using the *2023 Voter Registration Guidebook* and pages from the *2023 Election Administrator's Manual*.
- Work with Civix to retrain all board employees on how to enter data into SVRS to ensure each voter registration application received by the Board is accurate in terms of receipt and submission type, proper form types, dates the specific transactions occurred, and other relevant data points and documents to make the registration information complete in SVRS.

Section 5: Date Corrective Action Needs to be Taken

The Tippecanoe County Board of Elections and Registration must implement the additional recommended actions for board staff as soon as practicable to ensure that all voter registration applications processed by the board during the next voter registration period in accordance with both federal and state voter registration laws.

Section 6: Additional Information to Resolve Complaint

Additional resources available to the Tippecanoe County Board of Elections and Registration and their employees include, but are not limited to:

- 2023 Indiana Election Administrator's Manual
- 2023 Indiana Voter Registration Guidebook
- SVRS SOPs
- Civix trainings and guides approved by the Indiana Election Division and Secretary of State

These 2023 guides can be found online under the "Election Administrator's Portal" on www.in.gov/sos/elections. The SOPs and Civix guides are on the SVRS County Share Portal that can be accessed by county users of SVRS.

Section 7: Next Election After IEC Report Issued (State Voter Registration Law Complaint Only)

Assuming this report is approved and issued by the Indiana Election Commission on January 5, 2023, the number of days remaining until the next election will be conducted in Tippecanoe County for a non-federal office or on any public question will 117 days.

ADOPTED THIS 5th DAY OF JANUARY, 2023 BY THE INDIANA ELECTION COMMISSION

Paul Okeson, Chair

Suzannah Wilson Overholt, Vice Chair

Litany A. Pyle, Member

Karen Celestino-Horseman, Member

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2022 JUL 25 PM 1:21

July 21, 2022

J. Bradley King, Co-Director
Indiana Election Division
302 West Washington Street
Room E-204
Indianapolis, IN 46204

Angela M. Nussmeyer, Co-Director
Indiana Election Division
302 West Washington Street
Room E-204
Indianapolis, IN 46204

Re: Tippecanoe County Compliance with Indiana's Voter Registration Statute and the Home Rule Act

Dear Director King and Director Nussmeyer:

We write on behalf of Common Cause Indiana and the League of Women Voters of Greater Lafayette to notify you of ongoing violations of Indiana's voter registration statute, Ind. Code § 3-7-33-4.5 and Ind. Code 3-7-22-9 (the "VR Statute"), and the Home Rule Act, Ind. Code § 36-1-3, by the Tippecanoe County Board of Elections and Registration ("the Board"). This written notice is filed pursuant to Ind. Code § 3-7-11-3, and we respectfully request that you take immediate action under Ind. Code § 3-7-11 to address and remedy these ongoing violations and bring the Board into compliance with Indiana law.

Common Cause Indiana ("CCIN") is a nonpartisan organization that works to promote open, ethical, and accountable government and strives to see that every citizen has a fair opportunity to vote. Common Cause Indiana has approximately 13,000 members who live and vote throughout the State of Indiana. The League of Women Voters of Greater Lafayette ("LWV") is a nonpartisan political organization encouraging informed and active participation in government who engages in voter registration activities.

The Indiana Election Division ("IED"), as the chief election official, is responsible for compliance with the relevant portions of the Indiana Election Code. Ind. Code § 3-7-11-1. We write to you in hope of an amicable resolution of these violations, which are set forth in detail in this letter. Should such a resolution not be achievable, Common Cause Indiana and the League of Women Voters of Greater Lafayette are prepared to move forward with litigation to protect the rights of Indiana voters. This letter serves as written notice of current and pending violations, as required by Indiana state law. *See* Ind. Code § 3-7-11-3.

I. Background

Sometime prior to February 2022, the Tippecanoe County Clerk, Julie Roush, advised her staff to require a first-time registrant whose paper voter registration form is hand-delivered on their behalf to produce additional proof of residency documentation such as is required by both federal and state law for first-time voters who submit their forms by mail. *See* 52 U.S.C. § 21083(b); Ind. Code § 3-7-33-4.5. LWV became aware of this policy when conducting voter registration drives and voter protection efforts in the county, including efforts to engage young people, first-time voters, and historically disenfranchised communities. Volunteers from the LWV contacted Common Cause Indiana late this spring to make them aware of this violation of state law and requested their help in getting the issue addressed by the appropriate authority

In response to an inquiry regarding this matter, on February 8, 2022, Co-Director King sent an email to LWV and members of the County Clerk's office¹ stating that "[t]he only time that proof of Indiana residence is required as part of the voter registration process is when a voter registration form is submitted (by the voter or anyone else) through USPS to the county voter registration office. *See* Indiana Code 3-7-33-4.5." However, the County Clerk's office continued to enforce their policy. On March 10, 2022, a member of the Board's staff, Germany Harris, sent an email to LWV and the co-directors of the IED² stating that the Board's belief is that Ind. Code 3-7-22 and Ind. Code 3-7-33-4.5 direct them to "treat registration applications presented on behalf of another the same as presented by the USPS or by mail and directs us to process in the same manner." The Board also claimed that Ind. Code 3-7-33-4.5(c) gives them the right to impose additional proof of residency requirements on registrants whose forms are hand-delivered because it allows them "to determine whether or not an applicant is subject to requirements listed in Ind. Code 3-7-33-4.5."

Both Co-Director Nussmeyer and Co-Director King responded to this assertion in separate emails³ by referencing the IED's 2022 Voter Registration Guidebook, which outlines the IED's position that the proof of residency requirements imposed by state and federal law do not apply when a form is hand-delivered, even if by a third party, "as opposed to sending the application through U.S. mail." Director Nussmeyer informed Harris and other members of the Board staff that "[i]f a person hand-delivers a registration form . . . then the Board has no legal authority to require residency documentation." Furthermore, she stated that the Board's policy "does not comply with our state and federal registration laws and should no longer be followed."⁴

Even after receiving this correspondence and clear directive from the co-directors of the IED, the Board did not stop requiring proof of Indiana residence for first-time voters whose application forms were hand-delivered in their behalf. In the Indiana primary election on May 3, 2022, this requirement imposed by the Board appears to have resulted in at least one newly registered voter whose paper voter registration form was hand-delivered to be required to cast a provisional ballot

¹ A copy of this email is attached herein as Exhibit A.

² A copy of this email is attached as Exhibit B.

³ Copies of these emails are attached as Exhibits C and D.

⁴ *See* Exhibit C.

that was not counted. At its May 13, 2022 meeting, the Board refused to open and count a voter's provisional ballot, apparently solely because the voter did not produce the proof of residency required of first-time voters who submit their form by mail, in spite of the fact that this voter did not in fact submit their registration application by mail.⁵

The Board's ongoing enforcement of its unlawful policy has a harmful impact on voter registration activities undertaken by the League of Women Voters in and around Tippecanoe County. LWV registers more than five hundred seniors at area high schools annually and regularly conducts voter registration drives at Ivy Tech Community College Lafayette and Purdue University, state institutions with more than 45,000 undergraduate students, the majority of whom are first-time voters and thus subject to the Board's unlawful policy. Common practice involves the distribution of copies of the federally-prescribed voter registration form, which are then completed by the registrant and collected and delivered to the Board by volunteers on behalf of the registrant. These young, first-time voters, including young people of color, are less likely than older registrants to have a photo ID that reflects their current address or other easily obtainable proof of residency. In their March 10 email, the Board employee acknowledged that "many students may not be able to outright satisfy the application requirements for proof of residency" under their policy.⁶

The imposition of an additional and unlawful voter identification requirement makes registering to vote and voting particularly burdensome for these eligible high school and college students because, even if they cast a provisional ballot, their vote will not be counted unless and until they again appear in person and provide proof of residency. Despite the clear direction of both co-directors King and Nussmeyer that this policy violates Indiana and federal law, the Board appears unwilling to modify its policy in future elections.

II. The Board's Policy is Unlawful and Has No Basis in Indiana or Federal Law

A. Federal Law

Congress enacted the National Voter Registration Act ("NVRA") to increase access to the "fundamental right" of voting by "establish[ing] procedures that will increase the number of eligible citizens who register to vote." 52 U.S.C. § 20501. Section 6 of the NVRA requires states to "accept and use" the "mail voter registration application form" prescribed by the Federal Election Commission (commonly referred to as the "federal form"). 52 U.S.C § 20505.

⁵ In response to requests dated May 23 and June 6 from Ken Jones of the League of Women Voters of Greater Lafayette, the Board has refused to provide that person's identity, citing § 15482(a)(5)(B) of the Help America Vote Act of 2002. On July 7, the Board provided redacted copies of affidavits concerning challenged voters in the May 3 election. This disclosure indicates that the reason for challenge for the referenced voter was initially marked as failure to provide proof of residency, but later crossed out and changed to proof of identification. *See* Exhibit F. The changed reason marked on the affidavit conflicts with the reason for rejection stated by the Board at its public meeting on May 13.

⁶ *See* Exhibit B.

The Help America Vote Act of 2002 (“HAVA”) created the Election Assistance Commission, which is responsible for maintaining the federal voter registration form. It also states the sole exception to the NVRA’s requirement that states “accept and use” the federal form on its own for registering to vote for federal elections, requiring most first-time voters who register to vote by mail to submit a government document displaying their name and registration address either with the registration form or when they request a ballot for the first-time. 52 U.S.C. § 21083(b). The federal form itself includes instructions referencing this requirement.⁷

The United States Supreme Court has held that Section 6 of the NVRA precludes states from “requiring a Federal Form applicant to submit information beyond that required by the form itself” before accepting and using the form for registration to vote in federal elections, *Arizona v. Inter Tribal Council of Ariz., Inc.*, 570 U.S. 1, 20 (2013). The instructions on the federal form make clear that additional documentation is only required of first-time voters who “are registering to vote for the first-time in [their] jurisdiction and are mailing this registration application.”⁸

When the voter signs the federal form they affirm the following: “The information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false information, I may be fined, imprisoned, or (if not a U.S. citizen) deported from or refused entry to the United States.”⁹ Therefore, every voter, whether subject to HAVA ID or not, swears to the accuracy of their address when completing the federal form.

B. Indiana Voter Registration Law

Indiana voter registration law imposes a residency documentation requirement for first-time voters that register to vote by mail. Ind. Code § 3-7-33-4.5. These requirements mirror those codified in federal law by HAVA, and are triggered by the act of submitting a mail voter registration form¹⁰ “by mail.” *Id.*; Ind. Code 3-7-22-9. Hereinafter, these requirements and the related HAVA provisions will be known as “HAVA ID.”

Indiana state law requires a county election authority to accept a mail voter registration form—the federal form established by the NVRA—whenever it is presented (1) by the United States Postal Service (“USPS”); (2) by the registrant themselves; or (3) by a third party presenting the form on behalf of the registrant. Ind. Code 3-7-22-9. This section dictates through what methods the form must be accepted—for example, voter registration officials do not have to accept a form

⁷ See EAC, *National Voter Registration Application Form for U.S. Citizens (ENG)*, available at https://www.eac.gov/sites/default/files/eac_assets/1/6/Federal_Voter_Registration_ENG.pdf.

⁸ See EAC, *National Voter Registration Application Form for U.S. Citizens (ENG)*, available at https://www.eac.gov/sites/default/files/eac_assets/1/6/Federal_Voter_Registration_ENG.pdf (emphasis added).

⁹ *Id.*

¹⁰ The Indiana Code uses multiple terms to refer to the federal form including “mail voter registration form,” “application to register to vote by mail,” “registration by mail form,” and “mail registration form.” See Ind. Code § 3-7-22; Ind. Code 3-7-33. This document uses the term from the NVRA, “mail voter registration form,” and “federal form” interchangeably.

submitted through fax or email—not how they should be treated for purposes of HAVA ID. That is covered by Ind. Code 3-7-33-4.5, which states that HAVA ID requirements apply when first-time voters submit a mail voter registration form under option one, through USPS. *See* Ind. Code 3-7-22-9.

When a county voter registration office receives a voter registration application by mail, that office is responsible for determining whether that applicant is subject to HAVA ID requirements, namely whether or not they would be considered a first-time voter, and whether any of the exceptions to HAVA ID apply. Ind. Code 3-7-33-4.5. Voter registration in Tippecanoe County is supervised by a Board of Elections and Registration, which is vested with the election-related powers and duties of the county election board, board of registration, and county executive. Ind. Code § 3-6-5.4; *see* Ind. Code 3-7-12-7. Indiana’s Home Rule statute grants local government units the powers needed for the effective operation of government as to local affairs. Ind. Code § 36-1-3-2.

Indiana state law designates the co-directors of the IED as the chief state election officials responsible for the coordination of state responsibilities under the VR Statute and invites persons aggrieved by a violation of Article 7 of the Indiana Code to file a written notice of violation with the IED. Ind. Code § 3-7-11-1; Ind. Code § 3-7-11-3.

III. The IED Must Find that the Board’s Policy Constitutes a Clear Violation of Indiana Law

First-time voters who register to vote by mail are required by federal and state law to provide proof of residency. *See* 52 U.S.C. § 21083; Ind. Code 3-7-33-4.5. However, these additional proof of residency requirements do not apply to registrants whose paper registration form is hand-delivered, whether by the registrant or a third party. Nevertheless, the Tippecanoe County Board of Elections and Registration routinely triggers a proof of residency request for all first-time voters who use the federal registration form even when the form is hand delivered, a clear violation of state law.

While the overlapping references to the “mail voter registration form” and the act of registering “by mail” in the state and federal statutory text concerning HAVA ID lend some confusion at first glance, the ultimate meaning of applicable law is unambiguous. The HAVA ID requirements only apply to individuals registering to vote using the paper mail voter registration form if it is submitted “by mail,” which is a narrowly defined method of submission. The IED has spoken to clarify any confusion held by election officials on how to apply the statutory requirements in practice. Tippecanoe County is preempted under Indiana state law from adopting its own voter registration requirements for state and federal elections.

The text of the Indiana statute is unambiguous as to what conditions trigger the application of HAVA ID requirements to paper voter registration forms. Both legal and ordinary dictionaries

define the act of “mailing” in reference to delivery via the national postal system, USPS, not any other form of hand delivery.¹¹ Therefore, requirements that only apply to voter registration forms submitted “by mail” cannot reasonably be interpreted to apply to hand delivery by a third party who is not a postal worker.

Additionally, because both HAVA and the Indiana statute explicitly declare that enhanced residency requirements apply to individuals who have submitted a mail voter registration form by mail, they impliedly preclude application of these requirements to voter registration forms that are hand-delivered. *See* Ind. Code § 3-7-33-4.5. The *expressio unius est exclusio alterius* canon of statutory interpretation directs readers to understand that when one thing is expressly mentioned, others of the same class are implicitly excluded.¹² Here, lawmakers directed county voter registration officials to accept mail voter registration forms when they are presented in three ways: via USPS, by the person registering, and by a third party. Ind. Code § 3-7-22-9. Lawmakers explicitly directed the officials to apply HAVA ID requirements to first-time voters who submitted their mail voter registration form using the first method, “by mail.” Ind. Code § 3-7-33-4.5. By singling out the first method, lawmakers implicitly excluded the other two from HAVA ID requirements.

The IED has directly addressed this question in its 2022 Voter Registration Guidebook, which explicitly clarifies that mail voter registration forms can be mailed or hand-delivered, but “[p]roof of residency requirements do not apply to a person who hand-delivers their voter registration application to the Indiana Election Division or county voter registration office.” Indiana Election Division, *2022 Indiana Voter Registration Guidebook* 16 (2022).¹³ The Guidebook further clarifies that the additional proof of residency requirement imposed by the IN statute and HAVA “applies only to voter registration applications received in the mail,” not to a registrant who registered with a full service voter registration agency or to a registrant who fills out a registration application as part of a registration drive performed by a party or organization, even when the party or organization representative hand-delivers the registration applications to the county voter registration office. *Id.* at 41 (emphasis added).

The Tippecanoe County Board of Elections and Registration is not unaware of the IED’s directives regarding the proper interpretation of Ind. Code 3-7-33-4.5. On February 8, 2022, Co-Director King responded to an inquiry on this matter by informing the Tippecanoe County Clerk and her staff that “[t]he only time that proof of Indiana residence is required as part of the voter registration process is when a voter registration form is submitted (by the voter or anyone else) through USPS to the county voter registration office.”¹⁴ On March 10, 2022, Co-Director Nussmeyer contacted another employee of the Board to inform them of the policy, referencing the Guidebook as a representation of “the view of the bi-partisan Indiana Election Division and

¹¹ *See e.g., Mail*, Merriam-Webster, <https://www.merriam-webster.com/dictionary/mail> (last visited June 15, 2022) (“a nation’s postal system”); *Mail*, Black’s Law Dictionary (11th ed. 2019) (“To deposit (a letter, package, etc.) with the U.S. Postal Service”).

¹² *See expressio unius est exclusio alterius*, Black’s Law Dictionary (11th ed. 2019).

¹³ Available at <https://www.in.gov/sos/elections/files/2022-Voter-Registration-Guidebook.FINAL.pdf>.

¹⁴ *See* Exhibit A.

the co-directors,” as the chief election officials for the state of Indiana, and asking the Board to halt implementation of their policy.¹⁵ Nevertheless, the Board has continued to require additional proof of residency documentation of voters whose registration form was hand-delivered, rather than mailed.

Furthermore, the Tippecanoe County Board of Elections and Registration does not have the legal authority to establish voter registration requirements that differ from or go beyond those codified in state and federal voter registration law under Indiana’s Home Rule Act. Ind. Code § 36-1-3-1. Because registration to vote in state and federal elections is an issue of statewide concern, a county election authority is not authorized to initiate additional requirements regarding voter registration without express statutory authority from the state, which does not exist here. *Id.*

IV. Remedy and Written Notice

For the reasons set forth above, the Tippecanoe County Board of Elections and Registration is engaged in action that violates Indiana state law. This letter is our request that the IED take all necessary steps to ensure that the Tippecanoe County Board of Elections and Registration comes into compliance with the statutory provisions of the Indiana voter registration statute and the Home Rule Act. To remedy the application of this illegal policy, we ask that the IED review all voter registrations entered by Tippecanoe County from January 1, 2018 to present to identify all current registration records that were wrongfully flagged as requiring additional proof of residency and approve them as final and complete registrations. While we are hopeful that the IED will use its authority in the next ninety days to resolve these violations by bringing the Board into compliance with the law, we are prepared to move forward with litigation if a resolution is not achieved. Accordingly, this letter serves as written notice pursuant to Ind. Code § 3-7-11-3. We look forward to your response.

Sincerely,

Common Cause Indiana
Julia Vaughn
Executive Director
P.O. Box 1603
Indianapolis, IN 46206

The League of Women Voters of Greater Lafayette
Ken Jones
Chair, Voter Services Committee
PO Box 2085
West Lafayette, IN 47996-2085

¹⁵ See Exhibit C.

EXHIBIT A

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Email
IED (King) to Jones
Feb 8 2022

Synopsis: Response from IED R-Codirector (King) to Ken J. request
To discuss the issue.

Feb 8, 2022,
11:32 AM (6
days ago)

King, Brad

to Valerie, me, Julie, Germany, Angela

Dear Mr. Jones,

Thanks for your message.

The only time that proof of Indiana residence is required as part of the voter registration process is when a voter registration form is submitted (by the voter or anyone else) through USPS to the county voter registration office. See Indiana Code 3-7-33-4.5.

Angie may have additional thoughts.

If you have further questions, please let me know.

Sincerely,

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EXHIBIT B

RETRIEVED FROM DEMOCRACYDOCKET.COM



Ken Jones <joneskp0124@gmail.com>

Proof of Address - Tippecanoe County

Germany Harris <gharris@tippecanoe.in.gov>

Thu, Mar 10, 2022 at 11:10 AM

To: "vawarycha@iec.IN.gov" <vawarycha@iec.in.gov>, "Kochevar, Matthew R" <MKochevar@iec.in.gov>

Cc: "Nussmeyer, Angela M" <ANussmeyer@iec.in.gov>, "bking@iec.in.gov" <bking@iec.in.gov>, Ken Jones

<joneskp0124@gmail.com>, Julie Roush <jroush@tippecanoe.in.gov>, Mike Smith <msmith@tippecanoe.in.gov>, Juan Ramirez <jramirez@tippecanoe.in.gov>

Good Morning everyone,

Please see (Mail Registration) IC 3-7-22-9(3) a person presenting the form on behalf of the individual who is registering.

The Indiana code cited, IC 3-7-33-4.5 additional documentation required for certain voters, includes any voter who submitted an application to vote by mail under IC 3-7-22 (Mail Registration) therefore, including Section 9(3). Subsection C of IC 3-7-33-4.5 gives Tippecanoe county the right to determine whether or not an applicant is subject to requirements listed in IC 3-7-33-4.5

We believe that IC 3-7-22-9 (3) is directing us to treat registration applications presented on behalf of another the same as presented by the USPS or by mail and directs us to process in the same manner, which triggers the requirements of IC 3-7-22-5 (5). IC 3-7-33-4.5 (1) seems to affirm documentation of residency is required by referring back to IC 3-7-22 within that section, in essence, doubling down. If IC 3-7-22-9 isn't requiring those three manners of submission to be treated the same, it would not have been written that way. This requirement is not "grossly unreasonable" (*Simmons v Byrd*, Indiana Supreme Court) in application of registration law, and special requirements for different registrants is established in precedent (see *Morris v Powell* and *League of Women Voters v Rokita*, both Indiana Supreme Court).

We understand that many students may not be able to outright satisfy the application requirements for proof of residency at the time of submitting an application for registration. However, provided that the school, of the student registering, include a signed letter stating that each student submitting a voter registration application is indeed a resident of the county, our office has stated that it would work with schools whose students cannot meet the residency requirements.

Cordially,

Germany Harris, Board Staff

Tippecanoe County Board of Elections & Registration

20 North 3rd Street

Lafayette, Indiana 47901

(765) 423-9303

gharris@tippecanoe.in.gov

"In seeking happiness for others, you will find it yourself" -Unknown

If a person is unclear concerning election law provisions, the Tippecanoe County Board of Elections and Registration office can be used as an interpretive resource. However, where your legal rights are concerned, you must consult with your attorney to be fully and properly advised.

EXHIBIT C

RETRIEVED FROM DEMOCRACYDOCKET.COM



Ken Jones <joneskp0124@gmail.com>

Proof of Address - Tippecanoe County

Nussmeyer, Angela M <ANussmeyer@iec.in.gov>

Thu, Mar 10, 2022 at 11:31 AM

To: Germany Harris <gharris@tippecanoe.in.gov>, "Warycha, Valerie S" <VaWarycha@iec.in.gov>, "Kochevar, Matthew R" <MKochevar@iec.in.gov>

Cc: "King, Brad" <bking@iec.in.gov>, Ken Jones <joneskp0124@gmail.com>, Julie Roush <jroush@tippecanoe.in.gov>, Mike Smith <msmith@tippecanoe.in.gov>, Juan Ramirez <jramirez@tippecanoe.in.gov>

Hi, Germany. The statute you cite below refers to the "mail" registration form, which is the VRG-7, VRG-11, and federal voter registration form as these forms are commonly referred to in state and federal law as the "mail-in" registration form. This statute is NOT describing the voter registration forms as being mailed if hand-delivered. It is simply referring the form type, which is known in statute as "mail-in" to distinguish it from the online registration option, for example.

Further, IC 3-7-33-4.5(a) describes the method (by mail) of receiving the "mail-in" registration form and the procedures to follow. The statute is clear that IF the "mail-in" registration form is sent by mail, then first time voters in Indiana must provide residency documentation. It excludes hand-delivered "mail-in" registration forms from this residency requirement.

If a person hand-delivers a registration form, whether it be the VRG-7, VRG-11, or federal form, then the Board has no legal authority to require residency documentation as required by state and federal law for first time voters in Indiana that register to vote using the "mail-in" form by mail. The person hand-delivering the form does NOT need to be the person registering to vote; it can be hand-delivered by a third party as not in IC 3-7-22-9(2)(3) AND IC 3-7-33-3.7. The purple VR Guidebook covers this information in detail if you need to refer to it, as it represents the view of the bi-partisan Indiana Election Division and the co-directors, who are the NVRA officials for the state of Indiana.

Your Board does not have home rule authority to establish voter registration requirements not codified in federal and state voter registration law. The procedure documented below, in my view, does not comply with our state and federal registration laws and should no longer be followed.

Angie Nussmeyer

Co-Director | Indiana Election Division

302 West Washington Street | Room E-204 | Indianapolis, Indiana 46204

o. 317. 232-3940 | c. 317.442-1495 | anussmeyer@iec.in.gov

If a person is unclear concerning election law provisions, the Election Division can serve as an interpretive source. However, where important legal rights are concerned, you must consult with your own attorney to be fully and properly advised.

Angie

From: Germany Harris <gharris@tippecanoe.in.gov>

Sent: Thursday, March 10, 2022 11:10 AM

To: Warycha, Valerie S <VaWarycha@iec.IN.gov>; Kochevar, Matthew R <MKochevar@iec.IN.gov>

EXHIBIT D

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Email
IED Co-Director (King) to Ken J

Synopsis: Reply from IED co-counsel and co-director (King) to Ken J. email of March 9 reporting there is a problem and asking for guidance.

Mar 10, 2022, 4:19
AM (3 days ago)

Warycha, Valerie S <VaWarycha@iec.in.gov>
to me, Brad, Angela

Mr. Jones,

Brad and I are working together this morning and using my computer. His answers to your questions are below.

Valerie Warycha
Co-General Counsel
Indiana Election Division
302 W. Washington Street., Room E-204
Indianapolis, IN 46204
317-232-3929
vawarycha@iec.in.gov

If a person is unclear concerning election law provisions, the Election Division can serve as an interpretive source. However, where important legal rights are concerned, you must consult with your own attorney to be fully and properly advised.

From: Ken Jones <joneskp0124@gmail.com>
Sent: Wednesday, March 9, 2022 10:09:41 PM
To: Nussmeyer, Angela M <ANussmeyer@iec.IN.gov>; King, Brad <bking@iec.IN.gov>
Subject: Proof of Address - Tippecanoe County

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Good morning,

This message is in reference to a question you both answered back in early February of this year. While I believe your guidance on the law was clear and was shared with the county clerk, there is a determination from her to ignore your guidance and require proof of address for voter registration forms using the last four digits of the SSN for identification AND being turned-in by League of Women Voters volunteers (not mailed via USPS). As a quick reminder, the situation is this:

1. The League of Women Voter conducts voter registration drives in the local high schools.
2. We collect some number of registrations that are on the federal paper form and use the last 4 digits of the SSN for identification purposes.
3. We turn all of these forms into the board of elections office in-person.
4. Staff enter the information from the forms.
5. Staff triggers an address verification for these forms by ticking the box that the form was received by mail

In my first email to you in early February, I indicated that the staff had explained that they were powerless to change the address verification requirements due to software function. I've watched them perform the work and their procedure is to tick the Receive by Mail box if the voter did not turn in the registration form in person. In my opinion they are working around the proper use of the system which appears to be designed and functioning in accordance with the law. IC 3-7-33-4.5

Each year we register about 800 high school seniors and probably 100 -150 will use the paper form and SSN. By needlessly triggering this address verification requirement it opens the door to turning away voters at the polls who in every other aspect should be able to exercise their right to vote. I can imagine that this also impacts our many Purdue Students who decide to register in Tippecanoe County. I was advised this morning by Germany Harris in the election office:

It looks like Julie is going with the statute on this one. The office will continue to require proof of residency from any first time voters whose voter registration application is delivered to the office through the use of registration drives. The office considers this as mail delivery. We will except what you can provide from the high school as proof, if you're able to.

My request to you:

1. Germany's note is that Julie is going with the statute. I'm a layman, and I've read through IC 3-7-33-45, where in the statute is Tippecanoe's procedure allowed?

We have attached the 2022 voter registration guidebook. Please look at page 16 where it spells out the additional residency documentation. A person who hand-delivers a voter registration application, as opposed to sending the application through U.S. mail, is not required to provide the additional residency documentation. Likewise, an individual whose voter registration application is hand delivered by another person is not required to provide additional residency documentation.

2. What recourse do I have through your office to address this issue?

If you believe that a violation has occurred, you have the right to file a complaint with the county election board or with the Indiana Division. If you wish to file your complaint with the Indiana Election Division. The required form is attached.

2 Attachments

Email
IED Co-Director (King) to Ken J

RETRIEVED FROM DEMOCRACYDOCKET.COM

EXHIBIT E

RETRIEVED FROM DEMOCRACYDOCKET.COM



Ken Jones <joneskp0124@gmail.com>

Proof of Address - Tippecanoe County

Nussmeyer, Angela M <ANussmeyer@iec.in.gov>

Thu, Mar 10, 2022 at 11:00 AM

To: Ken Jones <joneskp0124@gmail.com>, "King, Brad" <bking@iec.in.gov>

Cc: "Kochevar, Matthew R" <MKochevar@iec.in.gov>, "Warycha, Valerie S" <VaWarycha@iec.in.gov>

Hi, Ken. Thanks again for bringing this to our attention.

Tippecanoe County has its own statute related to its Board of Elections and Registration (IC 3-6-5.4, generally). Unlike most counties, the county clerk is not the voter registration official for the county. Instead, the powers of the county election board, board of voter registration, and county executive as it relates to election and voter registration responsibilities is vested with the Board. The Board employs bi-partisan staff, which are equal in number, who carry out the day-to-day responsibilities of the bi-partisan board. This includes all voter registration responsibilities. The clerk would not be able to unilaterally make determinations about voter registration. In fact, under IC 3-7-12 (which are the statutes related to managing a board of voter registration, generally), if there is a disagreement between the co-directors of the voter registration board, then the matter is brought before the county election board. In this case, it would mean staff would bring a voter registration matter to the full Board of Elections and Registration, which includes the Democratic and Republican members along with the Clerk, to interpret the law.

If the facts presented below are accurate, then it appears the county clerk is allegedly advising staff to violate federal and state voter registration law by requiring an applicant whose registration form is hand-delivered to the office to provide additional residency documentation when the person is not required to do so under federal and state law. In my view, you have a few options. You can file a complaint with the county board of elections and registration and request a hearing on the matter. Alternatively or in tandem, you can file a grievance with the co-directors of the Indiana Election Division, who serve as the National Voter Registration Act (NVRA) officials for the state. I believe Brad and Valerie provided a grievance form for you to use, though I do not think it is applicable here. Instead, you would follow the procedures in IC 3-7-11, generally, which would require a written notice of the violation filed with the co-directors. IC 3-7-11-3 notes the information that should be contained within the notice a person would file with IED, and spells out the procedures that the co-directors would then follow.

I hope this information is helpful to you.

Angie

From: Ken Jones <joneskp0124@gmail.com>

Sent: Wednesday, March 09, 2022 10:10 PM

To: Nussmeyer, Angela M <ANussmeyer@iec.IN.gov>; King, Brad <bking@iec.IN.gov>

Subject: Proof of Address - Tippecanoe County

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

EXHIBIT F

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CHALLENGE AFFIDAVIT OF A VOTER BY A CHALLENGER OR MEMBER OF THE PRECINCT ELECTION BOARD / AFFIDAVIT OF A CHALLENGED VOTER

(PRE-4)

State Form 42132 (R14 / 3-22)
Indiana Election Division (IC 3-11-8-21; 3-11-8-23.5; 3-11-5-4-13.5; 3-11-5-4-13.6)

Is this an absentee ballot? Yes No

INSTRUCTIONS: After the challenger completes this side of the form, the challenged voter may complete the second page of this form. If the challenged voter does so, the challenged voter is entitled to cast a provisional ballot. Do not use this form to challenge a voter at a primary election due to the voter's party affiliation. Use PRE-6 form instead.
NOTE: THIS FORM MUST BE PRINTED DIRECTLY ON THE PRO-2 PROVISIONAL BALLOT SECURITY ENVELOPE.

STATE OF INDIANA, COUNTY OF TIPPECANOE

GENERAL INFORMATION

I, the undersigned, believe that _____, now offering to vote, is not a legal voter in this precinct, for the following reason(s):
(insert name of voter.)

Voter Eligibility - Fail Safe Procedures

- This voter's name is not included on the poll list, and is NOT entitled to vote by using a "Fail Safe" procedure.
- This voter's name is included on the poll list, but this voter does not currently reside in the precinct, and is NOT entitled to vote in this precinct by completing a VRG-4/12 form or a VRG-15 form, or other "Fail Safe" procedure.

Voter Identification

- This voter was unable or declined to present proof of identification when required by law to do so.
- This voter is identified on the poll list as required to present an additional document that confirms the voter's identity and current residence address, but has not done so.

Voter Eligibility - General Requirements

- This voter is not a U.S. citizen.
- This voter will not be eighteen (18) years of age or older at the general election.
- This voter's signature on the election day poll list does not match the signature on the voter's registration record.
- This voter's signature on the absentee ballot security envelope affidavit is missing or does not match the signature on the voter's absentee ballot application, electronic poll book, or registration record maintained in the statewide voter registration system.
- Other _____
(insert specific reason for challenging voter.)

I obtained the information from _____
(insert name of person(s) supplying information for challenge.)

CHALLENGER AFFIRMATION

I swear (or affirm) that the foregoing statements are true, to the best of my knowledge and belief, and understand that making a false statement on this affidavit is punishable under the penalties of perjury.

Signature of challenger <i>Michael Kasser</i>	Printed name <i>Michael Kasser</i>	If serving as precinct officer: <input checked="" type="checkbox"/> Inspector <input type="checkbox"/> Judge <input type="checkbox"/> Poll Clerk
Precinct <i>04</i>	Township or ward <i>Fairfield</i>	City or town <i>Lafayette</i>

AFFIRMATION OF AFFIDAVIT

STATE OF INDIANA)
COUNTY OF TIPPECANOE)

I swear (or affirm) that the above challenge affidavit of a voter was subscribed and sworn to before me this 3 day of May, 2022
Brian Leung *Bill Worve*
Signature of Official Administering Oath (Inspector, Judge, Poll Clerk, Sheriff, or Absentee Board Member Other than Challenger above) Printed Name and Title

AFFIDAVIT OF A CHALLENGED VOTER

GENERAL INFORMATION

I, the undersigned, state the following:

- that I am a citizen of the United States
- that my date of birth is _____ (mm/dd/yy) to the best of my information and belief.
- that I have been a bona fide resident of this precinct for thirty (30) days immediately before this election or I am qualified to vote in this precinct under IC 3-10-10, IC 3-10-11, or IC 3-10-12.
- that I am generally known by the name in which I desire to vote, which is _____
- that I have not voted and will not vote in _____
- that my present residence address is _____
(and, if applicable, my residence address thirty (30) days before this election was at: _____)
I moved to my residence address in this precinct on the following date: 08 / 01 / 2020 (mm/dd/yy)
- that, if applicable, if I was challenged under boxes 3 or 4 on the Affidavit of a Voter By a Challenger portion of this form, I did present proof of identification or additional documentation that complied with IC 3-5-2-40.5 or IC 3-7-33-4.5.

CHALLENGED VOTER AFFIRMATION

I swear (or affirm) that the foregoing statements are true, to the best of my knowledge and belief, and understand that making a false statement on this affidavit is punishable under the penalties of perjury.

Precinct	Township or ward	City or town
----------	------------------	--------------

AFFIRMATION OF AFFIDAVIT

STATE OF INDIANA)
COUNTY OF TIPPECANOE)

I swear (or affirm) that the above challenge affidavit of a voter was subscribed and sworn to before me this 3 day of May, 2022
Joseph Knight *Lead Judge*
Signature of Official Administering Oath (Inspector, Judge, Poll Clerk, Sheriff, or Absentee Board Member Other than Challenger above) Printed Name and Title



PROVISIONAL BALLOT SECURITY ENVELOPE

Part of State Form 42132 (R14 / 3-22)
Indiana Election Division (IC 3-11.7-1-8, 3-11.7-5-3; 3-11.5-4-13.5; 3-11.5-4-13.6)

(PRO-2)

TO THE VOTER

READ CAREFULLY AND FOLLOW THE INSTRUCTIONS BELOW.

STATE OF INDIANA)
COUNTY OF TIPPECANOE)

I, (Print your name and address below)

Name of Voter: [Redacted]

Residence Address of Voter (number and street, city, state, and ZIP code):
[Redacted]

Telephone number (optional): () - -

have cast the enclosed provisional ballot at Precinct Name: _____

at the (select one) PRIMARY GENERAL MUNICIPAL SPECIAL ELECTION

to be held on:

05/03/2022
(Insert date (mm/dd/yy) of election.)

[Redacted] Date signed (mm/dd/yy) 05/03/2022

COUNTY ELECTION BOARD FINDINGS

NOTE: Absentee voters voting by mail or traveling board do not complete PRO-2 because the application serves as the voter's response to the challenge.

The enclosed provisional ballot is determined to be:

- Valid
- Invalid due to the following reason: Voter failed to produce a valid form of voter ID, under IC 3-5-2-40.5, at the time of both casting a vote on election day and the time necessary for the completion

If invalid, this envelope may not be opened, and this ballot may not be counted. of this provisional ballot.

Dated (mm/dd/yy): 5/13/22

Tippecanoe County Election Board

TO THE PROVISIONAL BALLOT COUNTERS: After the ballot has been found valid by the county election board, open this envelope carefully. Do not deface or destroy the affidavit or the envelope. Take out the ballot enclosed for processing. If the ballot does not contain the initials of the poll clerks, the ballot shall, without being unfolded to disclose how the ballot is marked, be endorsed with the word "Rejected" and enclosed in State Form PRO-7 envelope.



CHALLENGE AFFIDAVIT OF A VOTER BY A CHALLENGER OR MEMBER OF THE PRECINCT ELECTION BOARD / AFFIDAVIT OF A CHALLENGED VOTER

(PRE-4)

State Form 42132 (R14 / 3-22)
Indiana Election Division (IC 3-11-8-21; 3-11-8-23.5, 3-11-5-4-13.5, 3-11.5-4-13.6)

Is this an absentee ballot? Yes No

INSTRUCTIONS: After the challenger completes this side of the form, the challenged voter may complete the second page of this form. If the challenged voter does so, the challenged voter is entitled to cast a provisional ballot. Do not use this form to challenge a voter at a primary election due to the voter's party affiliation. Use PRE-6 form instead.
NOTE: THIS FORM MUST BE PRINTED DIRECTLY ON THE PRO-2 PROVISIONAL BALLOT SECURITY ENVELOPE.

STATE OF INDIANA, COUNTY OF TIPPECANOE

GENERAL INFORMATION

I, the undersigned, believe that [redacted] (Insert name of voter.) now offering to vote, is not a legal voter in this precinct, for the following reason(s):

- Voter Eligibility - Fail Safe Procedures**
- This voter's name is not included on the poll list, and is NOT entitled to vote by using a "Fail Safe" procedure.
 - This voter's name is included on the poll list, but this voter does not currently reside in the precinct, and is NOT entitled to vote in this precinct by completing a VRG-4/12 form or a VRG-15 form, or other "Fail Safe" procedure.

- Voter Identification**
- This voter was unable or declined to present proof of identification when required by law to do so.
 - This voter is identified on the poll list as required to present an additional document that confirms the voter's identity and current residence address, but has not done so.

- Voter Eligibility - General Requirements**
- This voter is not a U.S. citizen.
 - This voter will not be eighteen (18) years of age or older at the general election.
 - This voter's signature on the election day poll list does not match the signature on the voter's registration record.
 - This voter's signature on the absentee ballot security envelope affidavit is missing or does not match the signature on the voter's absentee ballot application, electronic poll book, or registration record maintained in the statewide voter registration system.
 - Other _____

I obtained the information from _____ (Insert specific reason for challenging voter.)
_____ (Insert name of person(s) supplying information for challenge.)

CHALLENGER AFFIRMATION

I swear (or affirm) that the foregoing statements are true, to the best of my knowledge and belief, and understand that making a false statement on this affidavit is punishable under the penalties of perjury.

Signature of challenger <i>Michael Kaiser</i>	Printed name Michael Kaiser	If serving as precinct officer: <input checked="" type="checkbox"/> Inspector <input type="checkbox"/> Judge <input type="checkbox"/> Poll Clerk
Precinct	Township or ward	City or town

AFFIRMATION OF AFFIDAVIT

STATE OF INDIANA)
COUNTY OF TIPPECANOE)
I swear (or affirm) that the above challenge affidavit of a voter was subscribed and sworn to before me this 3 day of May, 2022
[Signature] Brian Leung Poll Clerk
Signature of Official Administering Oath (Inspector, Judge, Poll Clerk, Sheriff, or Absentee Board Member Other than Challenger above) Printed Name and Title

AFFIDAVIT OF A CHALLENGED VOTER

STATE OF INDIANA, COUNTY OF INDIANA

GENERAL INFORMATION

- I, the undersigned, state the following:
- that I am a citizen of the _____
 - that my date of birth is _____ (mm/dd/yy) to the best of my information and belief.
 - that I have been a bona fide resident of this precinct for thirty (30) days immediately preceding this election in this precinct under IC 3-10-10, IC 3-10-11, or IC 3-10-12.
 - that I am generally known by the name in _____
 - that I have not voted and will not vote in a _____
 - that my present residence address is _____ (and, if applicable, my residence address thirty (30) days before this election was at _____ I moved to my residence address in this precinct on the following date: 10/29/2020 (mm/dd/yy)
 - that, if applicable, if I was challenged under boxes 3 or 4 on the Affidavit of a Voter By a Challenger portion of this form, I did present proof of identification or additional documentation that complied with IC 3-5-2-40.5 or IC 3-7-33-4.5.

CHALLENGED VOTER AFFIRMATION

I swear (or affirm) that the foregoing statements are true, to the best of my knowledge and belief, and understand that making a false statement on this affidavit is punishable under the penalties of perjury.

[redacted]	[redacted]	[redacted]
[redacted]	Township or ward	[redacted]

AFFIRMATION OF AFFIDAVIT

STATE OF INDIANA)
COUNTY OF TIPPECANOE)
I swear (or affirm) that the above challenge affidavit of a voter was subscribed and sworn to before me this 3 day of May, 2022
William L Lapchotka William L Lapchotka
Signature of Official Administering Oath (Inspector, Judge, Poll Clerk, Sheriff, or Absentee Board Member Other than Challenger above) Printed Name and Title



PROVISIONAL BALLOT SECURITY ENVELOPE

Part of State Form 42132 (R14 / 3-22)
Indiana Election Division (IC 3-11.7-1-8; 3-11.7-5-3; 3-11.5-4-13.5; 3-11.5-4-13.6)

(PRO-2)

TO THE VOTER
READ CAREFULLY AND FOLLOW THE INSTRUCTIONS BELOW.

STATE OF INDIANA)
COUNTY OF TIPPECANOE)

I, (Print your name and address below)

Name of Voter: _____

Residence Address of Voter (number and street, city, state, and ZIP code):

Telephone number (optional): (_____) _____ - _____

have cast the enclosed provisional ballot at Precinct Name: _____

at the (select one) PRIMARY GENERAL MUNICIPAL SPECIAL ELECTION

to be held on:

May 3rd, 2022
(Insert date (mm/dd/yy) of election.)

Signature of voter _____ Date signed (mm/dd/yy) _____

COUNTY ELECTION BOARD FINDINGS

NOTE: Absentee voters voting by mail or traveling board do not complete PRO-2 because the application serves as the voter's response to the challenge.

The enclosed provisional ballot is determined to be:

Valid
 Invalid due to the following reason: voter Failed to produce a valid form of voter ID, under IC 3-5-2-40.5, at the time of both casting a vote on election day and the time necessary for the completion of this provisional ballot.

If invalid, this envelope may not be opened, and this ballot may not be counted.
Dated (mm/dd/yy): 5/13/22

Tippecanoe County Election Board

TO THE PROVISIONAL BALLOT COUNTERS: After the ballot has been found valid by the county election board, open this envelope carefully. Do not deface or destroy the affidavit or the envelope. Take out the ballot enclosed for processing. If the ballot does not contain the initials of the poll clerks, the ballot shall, without being unfolded to disclose how the ballot is marked, be endorsed with the word "Rejected" and enclosed in State Form PRO-7 envelope.



CHALLENGE AFFIDAVIT OF A VOTER BY A CHALLENGER OR MEMBER OF THE PRECINCT ELECTION BOARD / AFFIDAVIT OF A CHALLENGED VOTER

(PRE-4)

State Form 42132 (R14 / 3-22)
Indiana Election Division (IC 3-11-8-21, 3-11-8-23.5; 3-11.5-4-13.5; 3-11.5-4-13.6)

Is this an absentee ballot? Yes No

INSTRUCTIONS: After the challenger completes this side of the form, the challenged voter may complete the second page of this form. If the challenged voter does so, the challenged voter is entitled to cast a provisional ballot. Do not use this form to challenge a voter at a primary election due to the voter's party affiliation. Use PRE-6 form instead.
NOTE: THIS FORM MUST BE PRINTED DIRECTLY ON THE PRO-2 PROVISIONAL BALLOT SECURITY ENVELOPE.

STATE OF INDIANA, COUNTY OF TIPPECANOE

GENERAL INFORMATION

I, the undersigned, believe that [redacted], now offering to vote, is not a legal voter in this precinct, for the following reason(s):
(Insert name of voter.)

Voter Eligibility - Fail Safe Procedures

- 1. This voter's name is not included on the poll list, and is NOT entitled to vote by using a "Fail Safe" procedure.
- 2. This voter's name is included on the poll list, but this voter does not currently reside in the precinct, and is NOT entitled to vote in this precinct by completing a VRG-4/12 form or a VRG-15 form, or other "Fail Safe" procedure.

Voter Identification

- 3. This voter was unable or declined to present proof of identification when required by law to do so.
- 4. This voter is identified on the poll list as required to present an additional document that confirms the voter's identity and current residence address, but has not done so.

Voter Eligibility - General Requirements

- 5. This voter is not a U.S. citizen.
- 6. This voter will not be eighteen (18) years of age or older at the general election.
- 7. This voter's signature on the election day poll list does not match the signature on the voter's registration record.
- 8. This voter's signature on the absentee ballot security envelope affidavit is missing or does not match the signature on the voter's absentee ballot application, electronic poll book, or registration record maintained in the statewide voter registration system.
- 9. Other Abandoned ABS polling station & no statutory provision for primary 'write-in'

(Insert specific reason for challenging voter.)

I obtained the information from Mike Smith

(Insert name of person(s) supplying information for challenge.)

CHALLENGER AFFIRMATION

I swear (or affirm) that the foregoing statements are true, to the best of my knowledge and belief, and understand that making a false statement on this affidavit is punishable under the penalties of perjury.

Signature of challenger <u>[Signature]</u>	Printed name <u>Gorman Harris</u>	If serving as precinct officer: <input checked="" type="checkbox"/> Inspector <input type="checkbox"/> Judge <input type="checkbox"/> Poll Clerk
Precinct <u>Wabash 16</u>	Township or ward <u>Wabash</u>	City or town <u>West Lafayette</u>

AFFIRMATION OF AFFIDAVIT

STATE OF INDIANA)

COUNTY OF TIPPECANOE)

I swear (or affirm) that the above challenge affidavit of a voter was subscribed and sworn to before me this 19th day of April, 2022
[Signature] Jun Kamikoz, Board Staff

Signature of Official Administering Oath (Inspector, Judge, Poll Clerk, Sheriff, or Absentee Board Member Other than Challenger above)

Printed Name and Title

AFFIDAVIT OF A CHALLENGED VOTER

STATE OF INDIANA, COUNTY OF INDIANA

GENERAL INFORMATION

- I, the undersigned, state the following:
- 1. that I am a citizen of the [redacted]
 - 2. that my date of birth is [redacted] (mm/dd/yy) to the best of my information and belief.
 - 3. that I have been a bona fide resident of this precinct for thirty (30) days immediately before this election or I am qualified to vote in this precinct under IC 3-10-10, IC 3-10-11, or IC 3-10-12.
 - 4. that I am generally known by the name [redacted]
 - 5. that I have not voted and will not vote in [redacted]
 - 6. that my present residence address is [redacted]
(and, if applicable, my residence address thirty (30) days before this election was at [redacted]
I moved to my residence address in this precinct on the following date: [redacted] (mm/dd/yy)
 - 7. that, if applicable, if I was challenged under boxes 3 or 4 on the Affidavit of a Voter By a Challenger portion of this form, I did present proof of identification or additional documentation that complied with IC 3-5-2-40.5 or IC 3-7-33-4.5.

CHALLENGED VOTER AFFIRMATION

I swear (or affirm) that the foregoing statements are true, to the best of my knowledge and belief, and understand that making a false statement on this affidavit is punishable under the penalties of perjury.

Signature of challenged voter [redacted]	Printed name [redacted]
Precinct [redacted]	Township [redacted]
City or town <u>LAFAYETTE</u>	

AFFIRMATION OF AFFIDAVIT

STATE OF INDIANA)

COUNTY OF TIPPECANOE)

I swear (or affirm) that the above challenge affidavit of a voter was subscribed and sworn to before me this 19 day of April, 2022
[Signature] Julie Roush, Clerk

Signature of Official Administering Oath (Inspector, Judge, Poll Clerk, Sheriff, or Absentee Board Member Other than Challenger above)

Printed Name and Title



PROVISIONAL BALLOT SECURITY ENVELOPE

Part of State Form 42132 (R14 / 3-22)
Indiana Election Division (IC 3-11.7-1-8; 3-11.7-5-3; 3-11.5-4-13.5; 3-11.5-4-13.6)

TO THE VOTER

READ CAREFULLY AND FOLLOW THE INSTRUCTIONS BELOW.

STATE OF INDIANA)

COUNTY OF TIPPECANOE

I, (Print your name and address below.)

Name of Voter: _____



Residence Address of Voter (number and street, city, state, and ZIP code):

Telephone number (optional): _____

have cast the enclosed provisional ballot at Precinct Name: _____

at the (select one)

PRIMARY

GENERAL

MUNICIPAL

SPECIAL ELECTION

to be held on:

04/19/22

(Insert date (mm/dd/yy) of election.)

Signature _____

Date signed (mm/dd/yy)

04/19/22

COUNTY ELECTION BOARD FINDINGS

NOTE: Absentee voters voting by mail or traveling board do not complete PRO-2 because the application serves as the voter's response to the challenge.

The enclosed provisional ballot is determined to be:

Valid

Invalid due to the following reason: voter abandoned polling place to pursue the option of a 'write in'.

If invalid, this envelope may not be opened, and this ballot may not be counted.

Dated (mm/dd/yy):

2/13/22

Tippecanoe

County Election Board

TO THE PROVISIONAL BALLOT COUNTERS: After the ballot has been found valid by the county election board, open this envelope carefully. Do not deface or destroy the affidavit or the envelope. Take out the ballot enclosed for processing. If the ballot does not contain the initials of the poll clerks, the ballot shall, without being unfolded to disclose how the ballot is marked, be endorsed with the word "Rejected" and enclosed in State Form PRO-7 envelope.

EXHIBIT B



**ELECTION FRAUD AND ACCESSIBILITY
GRIEVANCE FORM**

**Indiana Secretary of State
HAVA Division**
Indiana Government Center South
302 West Washington Street, Room E-111
Indianapolis, Indiana 46204
Telephone: (866) 461-8683

PROCEDURE

Please complete this form below. After the form has been notarized, please submit it to the HAVA office at the address listed above. The form will be reviewed by the Election Division to determine if a violation may have occurred. If a violation may have occurred, then the complaint will be investigated.

PERSON FILING FORM

Name Ken Jones		
Address (street and number, city, state, ZIP code) LWVGL, PO Box 2085, West Layette, IN. 47996-2085		County of residence Tippecanoe
Email address (optional) joneskp0124@gmail.com	Day Telephone (765) 532-3435	Evening Telephone (765) 532-3435

NATURE OF THE GRIEVANCE

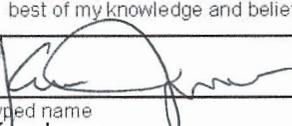
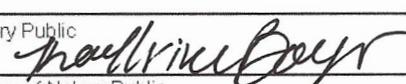
Please describe the nature of the complaint: (Attach additional Grievance sheets if necessary)

Please see attached.

Have you filed this complaint with your county election board?

Yes No

NOTARY CERTIFICATE

STATE OF <u>INDIANA</u>	} SS:
COUNTY OF <u>TIPPECANOE</u>	
I, <u>KATHRINE BOYER</u> swear or affirm that the information set forth above is true to the best of my knowledge and belief.	
Signature 	Signature of Notary Public 
Print or typed name Ken Jones	Print or typed name of Notary Public KATHRINE BOYER
Date subscribed and sworn to Notary Public July 29, 2022	County of Residence TIPPECANOE
	Date commission expires 11/8/29

Voters with disabilities needing assistance regarding accessibility issues may also contact the Indiana Protection and Advocacy Services at:

4701 N. Keystone Ave. #222
Indianapolis, IN 46205
(toll free) 800-622-4845
(TTY) 800-838-1131

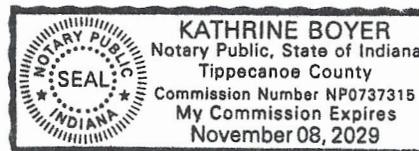


EXHIBIT C



STATE OF INDIANA Indiana Election Division

J. Bradley King, Co-Director
Angela M. Nussmeyer, Co-Director

Indiana Election Division
302 West Washington Street, Room E204
Indianapolis, Indiana 46204-2767
Phone: (317) 232-3939
Fax: (317) 233-6793

August 8, 2022
Julie Roush
Tippecanoe County Board of Elections and Registration
20 North 3rd Street
Lafayette, IN 47901
jroush@tippecanoe.in.gov

Dear Ms. Roush,

We are writing you in reference to a complaint filed with the Indiana Election Division on July 25, 2022, from the League of Women Voters of Greater Lafayette and Common Cause Indiana.

Pursuant to IC 3-7-11-4, we are required to determine if the facts alleged in the complaint from the League of Women Voters of Greater Lafayette and Common Cause Indiana allege a violation of the National Voter Registration Act (NVRA) or IC 3-7. On July 28, 2022, the co-directors determined the facts do allege a violation of IC 3-7, specifically IC 3-7-33-4.5, if assumed to be true. Based on this determination we are required by IC 3-7-11-6 to conduct an investigation.

We respectfully request that you provide the Indiana Election Division with any information regarding the alleged violations of Indiana's voter registration statutes, including the procedures the Board of Elections and Registration follows that would require a first-time voter in Indiana to provide proof of residency documentation after county registration officials process a federal or state paper voter registration form filed by mail or hand-delivery. Additional information relating to the allegations can be found in the enclosed documents.

We ask that you provide a written response and complete the attached affidavit affirming the information you provide is complete and accurate. Please file an original copy of the affidavit with the Indiana Election Division no later than close of business thirty (30) days from the date of this letter, or September 7, 2022.

Thank you for your cooperation and assistance in furthering our investigation of this matter.

Sincerely,

J. Bradley King
Co-Director

Angela M. Nussmeyer
Co-Director

Enclosure
cc: Tippecanoe County Board of Elections and Registration



STATE OF INDIANA
Indiana Election Division

J. Bradley King, Co-Director
Angela M. Nussmeyer, Co-Director

Indiana Election Division
302 West Washington Street, Room E204
Indianapolis, Indiana 46204-2767
Phone: (317) 232-3939
Fax: (317) 233-6793

August 8, 2022
Germany Harris
Tippecanoe County Board of Elections and Registration
20 North 3rd Street
Lafayette, IN 47901
gharris@tippecanoe.in.gov

Dear Mr. Harris,

We are writing you in reference to a complaint filed with the Indiana Election Division on July 25, 2022, from the League of Women Voters of Greater Lafayette and Common Cause Indiana.

Pursuant to IC 3-7-11-4, we are required to determine if the facts alleged in the complaint from the League of Women Voters of Greater Lafayette and Common Cause Indiana allege a violation of the National Voter Registration Act (NVRA) or IC 3-7. On July 28, 2022, the co-directors determined the facts do allege a violation of IC 3-7, specifically IC 3-7-33-4.5, if assumed to be true. Based on this determination we are required by IC 3-7-11-6 to conduct an investigation.

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Thank you for your cooperation and assistance in furthering our investigation of this matter.

Sincerely,

J. Bradley King
Co-Director

Angela M. Nussmeyer
Co-Director

Enclosure
cc: Tippecanoe County Board of Elections and Registration



STATE OF INDIANA
Indiana Election Division

J. Bradley King, Co-Director
Angela M. Nussmeyer, Co-Director

Indiana Election Division
302 West Washington Street, Room E204
Indianapolis, Indiana 46204-2767
Phone: (317) 232-3939
Fax: (317) 233-6793

August 8, 2022
Juan Ramirez
Tippecanoe County Board of Elections and Registration
20 North 3rd Street
Lafayette, IN 47901
jramirez@tippecanoe.in.gov

Dear Mr. Ramirez,

We are writing you in reference to a complaint filed with the Indiana Election Division on July 25, 2022, from the League of Women Voters of Greater Lafayette and Common Cause Indiana.

Pursuant to IC 3-7-11-4, we are required to determine if the facts alleged in the complaint from the League of Women Voters of Greater Lafayette and Common Cause Indiana allege a violation of the National Voter Registration Act (NVRA) or IC 3-7. On July 28, 2022, the co-directors determined the facts do allege a violation of IC 3-7, specifically IC 3-7-33-4.5, if assumed to be true. Based on this determination we are required by IC 3-7-11-6 to conduct an investigation.

We respectfully request that you provide the Indiana Election Division with any information regarding the alleged violations of Indiana's voter registration statutes, including the procedures the Board of Elections and Registration follows that would require a first-time voter in Indiana to provide proof of residency documentation after county registration officials process a federal or state paper voter registration form filed by mail or hand-delivery. Additional information relating to the allegations can be found in the enclosed documents.

We ask that you provide a written response and complete the attached affidavit affirming the information you provide is complete and accurate. Please file an original copy of the affidavit with the Indiana Election Division no later than close of business thirty (30) days from the date of this letter, or September 7, 2022.

Thank you for your cooperation and assistance in furthering our investigation of this matter.

Sincerely,

J. Bradley King
Co-Director

Angela M. Nussmeyer
Co-Director

Enclosure
cc: Tippecanoe County Board of Elections and Registration

EXHIBIT D

Julie A. Roush
clerk@tippecanoe.in.gov



INDIANA ELECTION DIVISION

Phone: 765.423.9326

Fax: 765.423.9194

2022 AUG -5 PM 2:47 www.tippecanoe.in.gov/clerk

Tippecanoe County Clerk of the Courts

301 Main Street • PO Box 1665, Lafayette, Indiana 47902

MEMORANDUM

TO: IED
FROM: TIPPECANOE COUNTY CLERK
DATE: 8/5/2022
RE: Complaint from League of Women Voters of Greater Lafayette under IC 3-7-11-3

Dear Members of the Indiana Election Division:

On or about July 21, 2022, the League of Women Voters of Greater Lafayette submitted a complaint to the Indiana Election Division under IC 3-7-11-3 concerning the practices of the Tippecanoe County Board of Election and Registration. On July 27, 2022, the Tippecanoe County Attorney emailed the attorneys for the IED inquiring about the process, citing IC 3-7-11-6 suggesting that, if the IED determined that the complaint stated a claim, the next step would be an investigation. On July 27, 2022, Mr. Kochevar indicated that the IED had not yet discussed the process but that it would be helpful to identify a person to whom any IED request for information and responses should be directed.

Please let this Memorandum confirm that requests for information and responses should be directed to my attention. (Julie Roush, Tippecanoe County Clerk c/o Tippecanoe County Board of Elections and Registration, 20 N. 3rd Street, Lafayette, IN 47901; phone: 765-423-9724; email: jroush@tippecanoe.in.gov.)

I would also like to provide some background on the process used when the BER receives a voter registration application hand-delivered by a third party on behalf of a first-time voter. Upon review of our process, neither a third-party delivered voter registration application nor a USPS delivered registration application is flagged as needing additional proof of residence. In other words, while previous correspondence has indicated a theoretical belief that third-party delivered registrations should be treated the same as USPS delivered registrations (and other applications received by "mail" such as Federal Express or non-USPS couriers); the actual practice has been not to flag any of those registrations as needing additional documentation. Rather, the BER has checked the Driver's License Number or Social Security information provided on the registration application (whether delivered by third party or by USPS) against the data base in SVRS. If that check matches the applicant to the number, the BER processes the registration as complete. If the check does not match the applicant to the number, regardless of the manner of delivery, the BER conducts follow up to determine the cause of the mismatch. The BER will attempt to contact the applicant by mail and by

phone (if applicable) in order to obtain or correct a missing or incorrect SSN or DLN. If the BER is not able to obtain correct information, the registration is assigned a voter ID number and processed before the next election. (According to INSVRS Help Desk, there is no flag in SVRS that states "proof of residence is needed". The only flag available is, "Verify ID".) By clicking on the DLN/SSN Match in the system, no flag will be added to the voter's registration.

Correct Registration - Task List
 Exempt: E - Voter Accessibility - 11 The Voters, Handicapped Act
Verify ID - HAVA Requirement:
DLN/SSN Match - Remove Verify ID Flag
No DLN/SSN Match - HAVA Requirement Not Met

It should be noted that there was a period of time in February and March of 2022 a member of the BER staff thought all third-party and USPS delivered applications were automatically marked as needing additional proof of residency and shared this incorrect information with a member of the League of Women Voters. In March, it was explained to the staff member that the system does not automatically require proof of residency, especially when there is an SSN or DLN match. The conversation with the League seems to have been triggered by forms of voter registration that had been modified from the federal form such that the portion that states "If you are registering to vote for the first time please refer to the application instructions on submitting copies of identification documents with this form" had been partially cut off along with the sections below that statement. Additionally, Box 6 of the federal form had been modified to add text that says "Last 4 digits of SSN, IN Driver's License # or IN State ID." (See attachments). The outcome of this alteration was the BER staff had to contact registrants to retrieve all 10 digits of their Indiana ID numbers in order to register the new voters. However, this did not result in any applicant's registration being incorrectly flagged.

It appears our manner of processing applications received via USPS is more permissive than the law requires, however, as relevant to the LWV complaint, our manner of processing applications received via third party is not more restrictive than permitted under IC 3-7-33-4.5, IC 3-7-22-9, or NVRA.

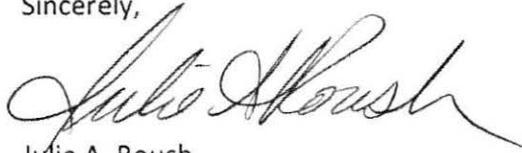
On 8/1/2022, I ran the *Proof of Residency* report, and found that 33 voters were on it. Only one voter on the list registered in 2022, after the May election, and another one in 2020. Other than those two registrants, none of the others were from 2018 or after. Twenty-three of them were from 2008. (See attached list.) The one that registered in 2022 by mail did not provide a DLN and their SSN did not show a match in the system. Correspondence was sent out requesting the missing and/or incorrect information, but nothing was sent back. No working phone number was provided. Regardless, the registrant's application was processed and completed, but with the "Verify ID" flag.

I also looked at the list of Incomplete Registrations listed in the Hopper in SVRS. That list showed that 21 registrants were incomplete. This list is not specific to mail-in or

third-party delivered registrations. In most cases, the reason for the incompleteness is that the given SSN or DLN either did not match any record in SVRS or were missing entirely. While researching the present complaint, I was able to contact one incomplete registrant who hadn't responded to previous contact attempts. His SSN did not match. When I contacted him, he advised that he made up a SSN because he did not remember it and that he was not a U.S. citizen. He said he filled out an application at a local high school because, "the guy and [his] friends pressured him to apply." His registration was canceled. Efforts to contact the remaining individuals on the Incomplete Registration list continue.

Based on the above, we believe that there has been no violation of NVRA. We would therefore respectfully request a determination of no violation under IC 3-7-11-5 or IC 3-7-11-8.

Sincerely,

A handwritten signature in cursive script, appearing to read "Julie A. Roush".

Julie A. Roush
Tippecanoe County Clerk

Attachment 1: Modified Federal Form and Original Federal Form
Attachment 2: Proof of Residency Report

RETRIEVED FROM DEMOCRACYDOCKET.COM

Proof of Residency Report

All Precincts

Tippecanoe County

<u>Name</u>	<u>Address</u>	<u>DOB</u>	<u>Reg Date</u>
ELOFF, JIMMIE	10 JOYE CT	04/24/1982	10/02/2000
MURPHY, MICHAEL	1309 HASP WAY	06/01/1990	10/15/2008
ABRAMS-HARRIS, ZYANNE	40 CORVETTE CT APT D	01/18/2000	05/24/2022
LEUCH, NICK	3204 LONGLOIS DR	11/21/1989	09/05/2008
HAMRICK, MELISSA	814 N 14TH ST APT 106	01/04/1978	03/16/2016
BARRETT, SARAH	127 S 27TH ST	02/03/1990	04/16/2008
THOMPSON, CASSANDRA	1632 SKYLINE RD	04/16/1989	10/12/2012
DEL REAL, DIANA	1101 HORNBEAM CIR E	09/03/1989	08/14/2008
GALBURTA, JOHN	2560 ECKMAN DR APT 12	04/23/1992	09/27/2016
MURILLO, CARINA	202 EQUESTRIAN DR	08/01/1981	10/15/2008
DAVENPORT, JOSEPH	6810 STATE ROAD 26 E	07/11/1954	04/16/2008
SWINDLE, SHON	11133 US HIGHWAY 231 S	10/01/1989	06/25/2008
DUNFORD, ALICE	6505 PIN OAKS DR	11/18/1934	10/03/2008
DOAN, ERIN	2410 SOLANO CT	05/23/1986	10/15/2008
LEITEM, DARL	2945 STATE ROAD 225 E	08/11/1985	09/30/2010
GEISLER, MICHAEL	3819 S 175 W	07/02/1964	08/27/1984
BENNETT, SANFORD	1300 W STADIUM AVE	08/14/1986	06/28/2008
JOHNSON, SARAH	801 DAVID ROSS RD	10/11/1986	04/16/2008
NELSON, BRADLEY	320 BROWN ST APT 622	05/23/1988	04/16/2008
MILLAR, JACOB	312 SHARON RD	04/09/1990	12/19/2008
BAWCUM, MICHAEL	640 N RUSSELL ST	11/15/1987	04/16/2008
BROWN, GREG	1160 W STADIUM AVE APT 400	11/24/1989	09/04/2008
HELMER, NADEZHDA	201 N MARTIN JISCHKE DR	06/14/1996	09/30/2015
JOHNSON, JAWANA	107 MACARTHUR DR	01/29/1989	04/16/2008
JUANG, WESLEY	201 N MARTIN JISCHKE DR APT SW	01/20/1994	09/27/2016
LEE, SEUNG SEOB	1016 W STADIUM AVE APT 1347	01/17/1988	09/04/2008
MARK, JOSHUA	1016 W STADIUM AVE	06/22/1991	07/22/2009
RISTICH, SAMUEL	1016 W STADIUM AVE	10/22/1989	09/06/2008
SCHIPPEN, MICHAEL	314 N RUSSELL ST # 25	03/26/1987	10/15/2008
FEE, JUSTEN	7436 TURNER RD	05/29/1989	04/16/2008
WANG, ANGEL	8720 W 700 S	04/01/1980	10/15/2008
GLOYESKE, REBECCA	3526 CANTERBURY DR	05/25/1990	04/13/2008
HUBBLE, RYAN	808 W 500 S	10/29/1987	10/07/2008

MODIFIED FEDERAL FORM RECEIVED BY
TIPPECANOE BOARD OF ELECTION AND REGISTRATION

RETRIEVED FROM DEMOCRACYDOCKET.COM

Processed

Voter Registration Application

Before completing this form, review the General, Application, and State specific instructions.

Are you a citizen of the United States of America? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Will you be 18 years old on or before election day? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If you checked "No" in response to either of these questions, do not complete form. (Please see state-specific instructions for rules regarding eligibility to register prior to age 18.)		This space for office use only.				
1	<input type="checkbox"/> Mr. <input checked="" type="checkbox"/> Miss <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms.	Last Name	First Name Middle Name(s)	<input type="checkbox"/> Jr <input type="checkbox"/> II <input type="checkbox"/> Sr <input type="checkbox"/> III <input type="checkbox"/> IV		
2	Home Address		Apt. or Lot #	City/Town	State	Zip Code
3	Address Where You Get Your Mail If Different From Above			City/Town	State	Zip Code
4	Date of Birth	Telephone Number (optional)	ID Number - (See Item 6 in the instructions for your state) Last 4 digits of SSH, IN Driver's License # or IN State ID #			
	Month Day Year		6 [Redacted] <i>askyad</i>			
	Choice of Party (See Item 7 in the instructions for your State)	Race or Ethnic Group (See Item 8 in the instructions for your State)				
9	I have reviewed my state's instructions and I swear/affirm that: <input checked="" type="checkbox"/> I am a United States citizen <input checked="" type="checkbox"/> I meet the eligibility requirements of my state and subscribe to any oath required. <input checked="" type="checkbox"/> The information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false information, I may be fined, imprisoned, or (if not a U.S. citizen) deported from or refused entry to the United States.		11 [Redacted] Please sign full name (or put mark) ▲			
	Date:		3 / 4 / 00 Month Day Year			

If you are registering to vote for the first time: please refer to the application instructions for information on submitting

RETRIEVED FROM DEMOCRATIC VOTER REGISTRATION BASKET.COM

Voter Registration Application

Before completing this form, review the General, Application, and State specific instructions.

Are you a citizen of the United States of America? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Will you be 18 years old on or before election day? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If you checked "No" in response to either of these questions, do not complete form. (Please see state-specific instructions for rules regarding eligibility to register prior to age 18.)		This space for office use only.			
1	<input type="checkbox"/> Mr. <input checked="" type="checkbox"/> Miss <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms:	Last Name: [REDACTED] First Name: [REDACTED]	Middle Name(s):	<input type="checkbox"/> Jr <input type="checkbox"/> II <input type="checkbox"/> Sr <input type="checkbox"/> IV	
2	Home Address	Apt. or Lot #	City/Town	State IN	Zip Code 47905
3	Address Where You Get Your Mail If Different From Above		City/Town	State	Zip Code
4	Date of Birth Month Day Year [REDACTED]	5	Telephone Number (optional) [REDACTED]	6	
7		8		6	
Choice of Party (See Item 7 in the instructions for your State)		Race or Ethnic Group (See Item 8 in the instructions for your State)		ID Number - (See Item 6 in the instructions for your state) Last four digits SSN or Indiana DL or ID Number [REDACTED]	
9 I have reviewed my state's instructions and I swear/affirm that: <input type="checkbox"/> I am a United States citizen <input type="checkbox"/> I meet the eligibility requirements of my state and subscribe to any oath required. <input type="checkbox"/> The information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false information, I may be fined, imprisoned, or (if not a U.S. citizen) deported from or refused entry to the United States.			[REDACTED SIGNATURE] Please sign full name (or put mark) ▲		
			Date: [REDACTED] / [REDACTED] / [REDACTED] Month Day Year		

If you are registering to vote for the first time: please refer to the application instructions for information on submitting copies of valid identification documents with this form

RETRIEVED FROM DEMOCRATICBOOKS.COM

FEDERAL FORM WITH INDIANA STATE INSTRUCTION

RETRIEVED FROM DEMOCRACYDOCKET.COM

Voter Registration Application

Before completing this form, review the General, Application, and State specific instructions.

Are you a citizen of the United States of America? <input type="checkbox"/> Yes <input type="checkbox"/> No Will you be 18 years old on or before election day? <input type="checkbox"/> Yes <input type="checkbox"/> No If you checked "No" in response to either of these questions, do not complete form. (Please see state-specific instructions for rules regarding eligibility to register prior to age 18.)		This space for office use only.			
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2	Home Address	Apt. or Lot #	City/Town	State	Zip Code
3	Address Where You Get Your Mail If Different From Above		City/Town	State	Zip Code
4	Date of Birth Month Day Year	5 Telephone Number (optional)	6 ID Number - (See item 6 in the instructions for your state)		
7	Choice of Party (see item 7 in the instructions for your State)	8 Race or Ethnic Group (see item 8 in the instructions for your State)			
9	I have reviewed my state's instructions and I swear/affirm that: <input type="checkbox"/> I am a United States citizen <input type="checkbox"/> I meet the eligibility requirements of my state and subscribe to any oath required. <input type="checkbox"/> The information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false information, I may be fined, imprisoned, or (if not a U.S. citizen) deported from or refused entry to the United States.		Please sign full name (or put mark) ▲ Date: _____ Month Day Year		

If you are registering to vote for the first time: please refer to the application instructions for information on submitting copies of valid identification documents with this form.

Please fill out the sections below if they apply to you.

If this application is for a **change of name**, what was your name before you changed it?

A	<input type="checkbox"/> Mr. <input type="checkbox"/> Miss Last Name <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms.	First Name	Middle Name(s)	<input type="checkbox"/> Jr <input type="checkbox"/> II <input type="checkbox"/> Sr <input type="checkbox"/> IV
---	--	------------	----------------	--

If you were registered before but this is the first time you are registering from the address in Box 2, what was your address where you were registered before?

B	Street (or route and box number)	Apt. or Lot #	City/Town/County	State	Zip Code
---	----------------------------------	---------------	------------------	-------	----------

If you live in a rural area but do not have a street number, or if you have no address, please show on the map where you live.

C	<ul style="list-style-type: none"> ■ Write in the names of the crossroads (or streets) nearest to where you live. ■ Draw an X to show where you live. ■ Use a dot to show any schools, churches, stores, or other landmarks near where you live, and write the name of the landmark. 	NORTH ↑																		
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;">Example</td> <td style="width: 10%; text-align: center;">Route #2</td> <td style="width: 10%; text-align: center;">● Grocery Store</td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">Woodchuck Road</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="text-align: center;">Public School ●</td> <td></td> <td></td> <td style="text-align: center;">X</td> <td></td> <td></td> </tr> </table>	Example	Route #2	● Grocery Store						Woodchuck Road				Public School ●			X			
Example	Route #2	● Grocery Store																		
		Woodchuck Road																		
Public School ●			X																	

If the applicant is unable to sign, who helped the applicant fill out this application? Give name, address and phone number (phone number optional).

D	
---	--

Mail this application to the address provided for your State.

State Instructions

- be at least 18 years old
- not have been convicted of a felony, and without having been restored to the rights of citizenship, or confined in prison on conviction of a criminal offense

Mailing address:

Secretary of State
P.O. Box 83720
State Capitol Bldg.
Boise, ID 83720-0080

Illinois

Updated: 09-03-2019

Registration Deadline — Online Registration is available until 16 days before the election and in-person registration is available through Election Day.

6. ID Number. Illinois requires either the Driver's License (or Secretary of State ID Card) or the last 4 digits of Social Security Number. For people who do not have either of those items, and have not registered in Illinois before, a mail in registration form should be accompanied by a copy of other identifying information: you must send, with this application, either (i) a copy of a current and valid photo identification, or (ii) a copy of a current utility bill, bank statement, government check, paycheck, or other government document that shows the name and address of the voter. If you do not provide the information required above, then you will be required to provide election officials with either (i) or (ii) described above the first time you vote at a voting place.

7. Choice of Party. Leave Blank. Exception: for primary elections, unless a voter only wishes to vote on

public questions, a party preference should be indicated.

8. Race or Ethnic Group. Leave blank.

9. Signature. A signature is required. If signature is missing from registration form, you will be notified your registration is incomplete.

To register in Illinois you must:

- be a citizen of the United States
- be a resident of Illinois and of your election precinct at least 30 days before the next election
- be at least 18 years old on or before the next General Election or Consolidated Election
- cannot be serving a sentence of confinement in any penal institution as a result of conviction of any crime
- not claim the right to vote anywhere else

Preregistration for 17 Year Olds. Illinois permits registration by a 17 year old person who will be 18 on or before the General Election (or the Consolidated Election, the odd year election for city, township, school board and other local offices) to register and vote in the General Primary (or Consolidated Primary) which will nominate candidates for that next following General Election (or Consolidated Election).

Mailing address:

State Board of Elections
2329 S. MacArthur Boulevard
Springfield, IL 62704

Indiana

Updated: 03-01-2006

Registration Deadline — 29 days before the election.

6. ID Number. Your state voter ID number is your ten digit Indiana issued driver's license number. If you do not possess an Indiana driver's license then provide the last four digits of your social security number. Please indicate which number was provided. (Indiana Code 3-7-13-13)

7. Choice of Party. Leave blank.

8. Race or Ethnic Group. Leave blank.

9. Signature. To register in Indiana you must:

- be a citizen of the United States
- have resided in the precinct at least 30 days before the next election
- be at least 18 years of age on the day of the next general election
- not currently be in jail for a criminal conviction

Mailing address:

Election Division
Office of the Secretary of State
302 West Washington Street,
Room E-204
Indianapolis, IN 46204-2743

Iowa

Updated: 10-31-2020

Registration Deadline — Must be delivered by 5 p.m. 10 days before the election, if it is a general election; 11 days before all others.* Registration forms which are postmarked 15 or more days before an election are considered on time even if received after the deadline.

*If you fail to meet the voter registration deadlines above you can register and vote by following the guidelines for election day registration. You can find these on the Iowa Secretary of State's website: <https://sos.iowa.gov/elections/voterinformation/edr.html>.

EXHIBIT E

Law Offices of
HOFFMAN, LUHMAN & MASSON, PC

*200 Ferry Street, Suite C
Post Office Box 99
Lafayette, Indiana 47902
Telephone: (765) 423-5404
Fax (765) 742-6448
Email: djm@hlblaw.com*

DOUGLAS J. MASSON
MATTHEW A. SALSBERY

J. FREDERICK HOFFMAN (1922-2003)
DAVID W. LUHMAN, *Of Counsel*

September 6, 2022

VIA EMAIL AND U.S. Mail

J. Bradley King
Angela M. Nussmeyer
Indiana Election Division
302 West Washington Street, Room E204
Indianapolis, IN 46204-2767

Re: LWVGL and Common Cause NVRA Complaint against Tippecanoe County Board of
Election and Registration

Dear Mr. King and Ms. Nussmeyer:

In response to your correspondence dated August 8, 2022, directed to members and employees of the Tippecanoe County Board of Election and Registration with respect to IED's investigation of the complaint filed by the League of Women Voters of Greater Lafayette and Common Cause Indiana, please find affidavits from the following:

1. Randall Vonderheide – Republican Member
2. E. Kent Moore – Democratic Member
3. Julie Roush – Clerk/Member
4. Joseph Bumbleburg – Deputy to the Democratic Member
5. Ryan Munden – Deputy to the Republican Member
6. Germany Harris – Democratic employee
7. Juan Ramirez – Republican employee

Very truly yours,

HOFFMAN, LUHMAN & MASSON, PC

/s/Douglas J. Masson
Douglas J. Masson
DJM

AFFIDAVIT OF RANDALL VONDERHEIDE

Comes now Randall L. Vonderheide, under the penalties for perjury, and swears or affirms as follows:

1. I am over 18 years of age and am competent to testify to the matters described herein.
2. I am a resident of Tippecanoe County, Indiana.
3. I have been provided with the complaint filed with the Indiana Election Division from the League of Women Voters of Greater Lafayette (LWVGL) and Common Cause.
4. During the time period relevant to the events described in the complaint, I have served as the Republican member of the Tippecanoe County Board of Election and Registration appointed under IC 3-6-5.4-4(a)(1). I presently serve as the President of the Board.
5. As a Board of Election member, I do not maintain day-to-day management oversight of office employees of the Tippecanoe County Board of Election and Registration.
6. I have no personal knowledge of the interactions described in the Complaint with respect to the discussions between representatives of LWVGL and employees of the Tippecanoe County Board of Election and Registration. Any knowledge of those events was obtained after those interactions.
7. The Complaint alleges that, on May 13, 2022, the Board rejected a voter's provisional ballot due to a failure by the voter to provide residency documentation. This is not accurate. No ballots were rejected at the May 13, 2022, meeting for failure to provide residency documentation. As reflected in the County Election Board Findings, two of the rejected provisional ballots attached to the Complaint at Exhibit E were rejected for the individual's failure to produce a valid form of voter identification and one was rejected because the voter abandoned the polling place to pursue the option of a write in candidate. Furthermore, I am unaware of ballots having been rejected by the Board at any other time for failure to provide residency documentation.
8. During my tenure as Board member, the Board has not adopted a local policy requiring first-time voters whose voter registration application is delivered by third-parties other than the United States Postal Service to provide additional documentation under IC 3-7-33-4.5. I do not believe the Board has adopted such a policy.
9. In my capacity as President of the Board, I have inquired about the allegations in the Complaint. The Complaint references a time frame dating back to 2018. Upon information and belief, since 2018, no applications for registration have been rejected for failure to provide the additional residency documentation complained of. I do not believe any registration applications delivered by third-parties have resulted in the voter being flagged in our computerized systems as being required to provide additional residency documentation as a condition of voting. I have been provided with a copy of the County's "Proof of Residency Report" dated August 1, 2022. It

reflects one entry since 2018, and I have been advised that this entry is from a voter whose registration application was submitted via the United States Postal Service.

Further your affiant saith not.

Dated this 6th day of September, 2022.

Randall L. Vonderheide

Randall L. Vonderheide

RETRIEVED FROM DEMOCRACYDOCKET.COM

AFFIDAVIT OF E. KENT MOORE

Comes now E. Kent Moore, under the penalties for perjury, and swears or affirms as follows:

1. I am over 18 years of age and am competent to testify to the matters described herein.
2. I am a resident of Tippecanoe County, Indiana.
3. I have been provided with the complaint filed with the Indiana Election Division from the League of Women Voters of Greater Lafayette (LWVGL) and Common Cause.
4. During the time period relevant to the events described in the complaint, I have served as the Democratic member of the Tippecanoe County Board of Election and Registration appointed under IC 3-6-5.4-4(a)(1).
5. I have no personal knowledge of the interactions described in the Complaint with respect to the discussions between representatives of LWVGL and employees of the Tippecanoe County Board of Election and Registration.
6. The Complaint alleges that, on May 13, 2022, the Board rejected a voter's provisional ballot due to a failure by the voter to provide residency documentation. This is not accurate. No ballots were rejected at the May 13, 2022, meeting for failure to provide residency documentation. As reflected in the County Election Board Findings, two of the rejected provisional ballots attached to the Complaint at Exhibit E were rejected for the individual's failure to produce a valid form of voter identification and one was rejected because the voter abandoned the polling place to pursue the option of a write in candidate. Furthermore, I am unaware of ballots having been rejected by the Board at any other time for failure to provide residency documentation.
7. During my tenure as Board member, the Board has not adopted a local policy requiring first-time voters whose voter registration application is delivered by third-parties other than the United States Postal Service to provide additional documentation under IC 3-7-33-4.5. I do not believe the Board has adopted such a policy.

Further your affiant saith not.

Dated this 31 day of August, 2022.



E. Kent Moore

AFFIDAVIT OF JOSEPH BUMBLEBURG

Comes now Joseph Bumbleburg, under the penalties for perjury, and swears or affirms as follows:

1. I am over 18 years of age and am competent to testify to the matters described herein.
2. I am a resident of Tippecanoe County, Indiana.
3. I have been provided with the complaint filed with the Indiana Election Division from the League of Women Voters of Greater Lafayette (LWVGL) and Common Cause.
4. During the time period relevant to the events described in the complaint, I have served, pursuant to IC 3-6-5.4-6, as a deputy to the Democratic member of the Tippecanoe County Board of Election and Registration.
5. I have no personal knowledge of the interactions described in the Complaint with respect to the discussions between representatives of LWVGL and employees of the Tippecanoe County Board of Election and Registration.
6. The Complaint alleges that, on May 13, 2022, the Board rejected a voter's provisional ballot due to a failure by the voter to provide residency documentation. This is not accurate. No ballots were rejected at the May 13, 2022, meeting for failure to provide residency documentation. As reflected in the County Election Board Findings, two of the rejected provisional ballots attached to the Complaint at Exhibit E were rejected for the individual's failure to produce a valid form of voter identification and one was rejected because the voter abandoned the polling place to pursue the option of a write in candidate. Furthermore, I am unaware of ballots having been rejected by the Board at any other time for failure to provide residency documentation.
7. During my tenure as deputy, the Board has not adopted a local policy requiring first-time voters whose voter registration application is delivered by third-parties other than the United States Postal Service to provide additional documentation under IC 3-7-33-4.5. I do not believe the Board has adopted such a policy.

Further your affiant saith not.

Dated this 31 day of August, 2022.



Joseph Bumbleburg

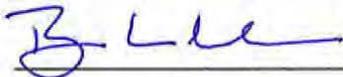
AFFIDAVIT OF RYAN MUNDEN

Comes now Ryan C. Munden, under the penalties for perjury, and swears or affirms as follows:

1. I am over 18 years of age and am competent to testify to the matters described herein.
2. I am a resident of Tippecanoe County, Indiana.
3. I have been provided with the complaint filed with the Indiana Election Division from the League of Women Voters of Greater Lafayette (LWVGL) and Common Cause.
4. During the time period relevant to the events described in the complaint, I have served, pursuant to IC 3-6-5.4-6, as a deputy to the Republican member of the Tippecanoe County Board of Election and Registration.
5. I have no personal knowledge of the interactions described in the Complaint with respect to the discussions between representatives of LWVGL and employees of the Tippecanoe County Board of Election and Registration.
6. The Complaint alleges that, on May 13, 2022, the Board rejected a voter's provisional ballot due to a failure by the voter to provide residency documentation. This is not accurate. No ballots were rejected at the May 13, 2022, meeting for failure to provide residency documentation. As reflected in the County Election Board Findings, two of the rejected provisional ballots attached to the Complaint at Exhibit E were rejected for the individual's failure to produce a valid form of voter identification and one was rejected because the voter abandoned the polling place to pursue the option of a write in candidate. Furthermore, I am unaware of ballots having been rejected by the Board at any other time for failure to provide residency documentation.
7. During my tenure as deputy, the Board has not adopted a local policy requiring first-time voters whose voter registration application is delivered by third-parties other than the United States Postal Service to provide additional documentation under IC 3-7-33-4.5. I do not believe the Board has adopted such a policy.

Further your affiant saith not.

Dated this 31st day of August, 2022.



Ryan C. Munden

AFFIDAVIT OF GERMANY HARRIS

Comes now Germany Harris, under the penalties for perjury, and swears or affirms as follows:

1. I am over 18 years of age and am competent to testify to the matters described herein.
2. I am a resident of Tippecanoe County, Indiana.
3. Since March of 2020, I have been employed with the Tippecanoe County Board of Elections and Registration, appointed to the position by the Board upon nomination of the Democratic County Chairman pursuant to IC 3-6-5.4-7.
4. In that position, among other duties, I process registration applications submitted to the Board.
5. I am in receipt of a letter from the co-director of the Indiana Election Division investigating a complaint submitted by the League of Women Voters of Greater Lafayette and Common Cause Indiana ("Complaint"). This affidavit is intended to respond to that letter.
6. The investigation letter requests information regarding the allegations in the Complaint, particularly having to do with "the procedures the Board of Elections and Registrations follows that would require a first-time voter in Indiana to provide proof of residency documentation after county registration officials process a federal or state paper voter registration form filed by mail or hand-delivery."
7. Attached as Exhibit A is the "Proof of Residency Report" from our systems. The Complaint references the period from 2018 to the present. The Proof of Residency Report reveals one person registered since 2018 who is flagged as being required to provide proof of residency. That individual's registration was received via the United States Postal Service and did not provide a driver's license number or last four digits of a social security number that matched an existing Indiana identification record or otherwise demonstrate an applicable exemption. (See SOP VRG 50.1.)
8. When our office receives paper registration applications, whether hand delivered or via the United States Postal Service (USPS), our practice is to verify the applicant's Social Security Number, Indiana Driver's License Number, or Indiana Identification Number (unless the applicant indicates that he or she does not have any of those.) Where those numbers do not match an existing record, the application is treated as incomplete and our office initiates efforts to contact the applicant by telephone, mail, and/or email depending on what contact information the applicant has provided. (See VRG 1.3). An Incomplete Registration could also arise from the applicant's failure to provide other required information (e.g. residence address, date of birth, statement of citizenship, and signature.)
9. I believe the confusion in this case arose out of conversations between myself and Ken Jones of the League of Women Voters of Greater Lafayette. It is common for LWVGL to submit voter registration applications on versions of the federal Voter Registration Application that have

been modified. Exhibit B contains two versions of this modified form. Prior to the Complaint, Box 6 of the form was modified to add the text "Last four digits SSN or Indiana DL or ID Number." This added text caused confusion in that applicants would, for example, supply only four digits of their driver's license. (A revised, but still modified, version of the federal form was submitted on August 22, 2022, with the added text reading "Last 4 digits of Social Security Number" which remains problematic in that the Indiana Driver's License Number or ID Number is also permissible.)

10. In the course of discussions with Mr. Jones on how to ensure fewer Incomplete Registrations were submitted to our office, I shared with him two forms generated when a registration is incomplete. One page is a "voter registration application notice of disposition" with a box for, among other things, "the following information was incomplete or missing from your application." Our office adds a notation indicating specifically what information was missing. The other form generated that I shared with Mr. Jones is a letter that discusses registration by mail and the need to provide a personal identification document for the individual's ballot to be counted in the next election. However, it is important to note: a) this is not sent to every individual with an incomplete registration; b) it specifies as one of the available exemptions "I did not register to vote by mailing a voter registration application to your office," and c) as the Proof of Residency Report confirms, individuals who register by third-party hand-delivery are not being flagged as requiring proof of residency.
11. The complaint contains exchanges, in chronological order, from:
 - a. February 8, 2022, at 11:32 a.m. (Exhibit A – Email from Brad King to Ken Jones),
 - b. March 10, 2022, at 4:19 a.m. (Exhibit D – email from Valerie Warycha/Brad King to Ken Jones),
 - c. March 10, 2022, at 11:00 a.m. (Exhibit E – email from Angela Nussmeyer to Ken Jones),
 - d. March 10, 2022 at 11:10 a.m. (Exhibit B – email from Germany Harris to IED), and
 - e. March 10, 2022, at 11:31 a.m. (Exhibit C – email from Angela Nussmeyer to me).

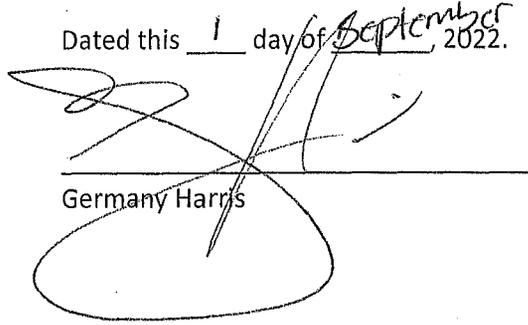
The emails from me reflect my reading of IC 3-7-33-4.5(a)(1) stating that the section applies to an individual who "submits an application to register to vote by mail under IC 3-7-22," suggesting that IC 3-7-22 modifies the common understanding of "mail" in some fashion; combined with IC 3-7-22-9 discussing three ways a "registration by mail form" might be received. However, particularly after the exchange with the IED in March 2022, I understand and accept that IED reads the statutes differently. No registration application has been rejected for failure to provide additional proof of residency, and as reflected in the "Proof of Residency Report," the only applicant registered after 2018 who is flagged as being required to provide additional residency documentation under IC 3-7-33-4.5 is an individual whose application was received through the United States Postal Service. Neither I nor this office intend to flag future applications received via a person presenting the form on behalf of another individual as requiring additional residency documentation under IC 3-7-33-4.5.

12. The Complaint alleges that, on May 13, 2022, the Tippecanoe County Board of Election and Registration rejected a voter's provisional ballot due to a failure by the voter to provide residency documentation. This is not accurate. No ballots were rejected at the May 13, 2022, meeting for failure to provide residency documentation. As reflected in the County Election

Board Findings, two of the rejected provisional ballots attached to the Complaint at Exhibit E were rejected for the individual's failure to produce a valid form of voter identification and one was rejected because the voter abandoned the polling place to pursue the option of a write in candidate. Furthermore, I am unaware of ballots having been rejected by the Board at any other time for failure to provide residency documentation.

Further your affiant saith not.

Dated this 1 day of September, 2022.



A handwritten signature in black ink, appearing to read "Germany Harris", is written over a horizontal line. The signature is stylized and somewhat illegible.

Germany Harris

RETRIEVED FROM DEMOCRACYDOCKET.COM

Proof of Residency Report

All Precincts

Tippecanoe County

<u>Name</u>	<u>Address</u>	<u>DOB</u>	<u>Reg Date</u>
E... JIMMIE	10 JOYE CT	04/24/1982	10/02/2000
MURPHY, MICHAEL	1309 HASP WAY	06/01/1990	10/15/2008
ABRAMS-HARRIS, ZYANNE	40 CORVETTE CT APT D	01/18/2000	05/24/2022
LEUCH, NICK	3204 LONGLOIS DR	11/21/1989	09/05/2008
HAMRICK, MELISSA	814 N 14TH ST APT 106	01/04/1978	03/16/2016
BARRETT, SARAH	127 S 27TH ST	02/03/1990	04/16/2008
THOMPSON, CASSANDRA	1632 SKYLINE RD	04/16/1989	10/12/2012
DEL REAL, DIANA	1101 HORNBEAM CIR E	09/03/1989	08/14/2008
GALBURTA, JOHN	2560 ECKMAN DR APT 12	04/23/1992	09/27/2016
MURILLO, CARINA	202 EQUESTRIAN DR	08/01/1981	10/15/2008
DAVENPORT, JOSEPH	6810 STATE ROAD 26 E	07/11/1954	04/16/2008
SWINDLE, SHON	11133 US HIGHWAY 231 S	10/01/1989	06/25/2008
DUNFORD, ALICE	6505 PIN OAKS DR	11/18/1934	10/03/2008
DOAN, ERIN	2410 SOLANO CT	05/23/1986	10/15/2008
LEITEM, DARL	2945 STATE ROAD 225 E	08/11/1985	09/30/2010
GEISLER, MICHAEL	3819 S 175 W	07/02/1964	08/27/1984
BENNETT, SANFORD	1300 W STADIUM AVE	08/14/1986	06/28/2008
JOHNSON, SARAH	801 DAVID ROSS RD	10/11/1986	04/16/2008
NELSON, BRADLEY	320 BROWN ST APT 622	05/23/1988	04/16/2008
MILLAR, JACOB	312 SHARON RD	04/09/1990	12/19/2008
BAWCUM, MICHAEL	640 N RUSSELL ST	11/15/1987	04/16/2008
BY...N, GREG	1160 W STADIUM AVE APT 400	11/24/1989	09/04/2008
HELMER, NADEZHDA	201 N MARTIN JISCHKE DR	06/14/1996	09/30/2015
JOHNSON, JAWANA	107 MACARTHUR DR	01/29/1989	04/16/2008
JUANG, WESLEY	201 N MARTIN JISCHKE DR APT SW	01/20/1994	09/27/2016
LEE, SEUNG SEOB	1016 W STADIUM AVE APT 1347	01/17/1988	09/04/2008
MARK, JOSHUA	1016 W STADIUM AVE	06/22/1991	07/22/2009
RISTICH, SAMUEL	1016 W STADIUM AVE	10/22/1989	09/06/2008
SCHIPPEN, MICHAEL	314 N RUSSELL ST # 25	03/26/1987	10/15/2008
FEE, JUSTEN	7436 TURNER RD	05/29/1989	04/16/2008
WANG, ANGEL	8720 W 700 S	04/01/1980	10/15/2008
GLOYESKE, REBECCA	3526 CANTERBURY DR	05/25/1990	04/13/2008
HUBBLE, RYAN	808 W 500 S	10/29/1987	10/07/2008

Voter Registration Application

Before completing this form, review the General, Application, and State specific instructions.

Filed

Are you a citizen of the United States of America? Yes No

Will you be 18 years old on or before election day? Yes No

If you checked "No" in response to either of these questions, do not complete form.
(Please see state-specific instructions for rules regarding eligibility to register prior to age 18.)

This space for office use only. **AUG 22 2022**

1 Last Name: [Redacted] First Name: [Redacted] Middle Name(s): [Redacted]

Jr II
 Sr III
 IV

2 Home Address: [Redacted] Apt. or Lot #: [Redacted] City/Town: [Redacted] State: [Redacted] Zip Code: [Redacted]

3 Address Where You Get Your Mail If Different From Above: [Redacted] City/Town: [Redacted] State: [Redacted] Zip Code: [Redacted]

4 Date of Birth: [Redacted] (Month Day Year) 5 Telephone Number (optional): [Redacted]

6 ID Number - (See item 6 in the instructions for your state)
Last 4 digits of Social Security Number: [Redacted]

7 Choice of Party (see item 7 in the instructions for your State): [Redacted] 8 Race or Ethnic Group (see item 8 in the instructions for your State): [Redacted]

9 I have reviewed my state's instructions and I swear/affirm that:

- I am a United States citizen
- I meet the eligibility requirements of my state and subscribe to any oath required.
- The information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false information, I may be fined, imprisoned, or (if not a U.S. citizen) deported from or refused entry to the United States.

Please sign full name (or put mark) ▲
Date: [Redacted] (Month Day Year)

If you are registering to vote for the first time: please refer to the application instructions for information on submitting copies of valid identification documents with this form.

Voter Registration Application

Before completing this form, review the General, Application, and State specific instructions.

Filed

Are you a citizen of the United States of America? Yes No

Will you be 18 years old on or before election day? Yes No

If you checked "No" in response to either of these questions, do not complete form.
(Please see state-specific instructions for rules regarding eligibility to register prior to age 18.)

This space for office use only. **MAR 11 2022**

1 Mr. Miss Mrs. Ms. Last Name: [Redacted] First Name: [Redacted]

TIPPECANOE COUNTY BOARD OF ELECTIONS AND REGISTRATION

Jr II
 Sr III
 IV

2 Home Address: [Redacted] Apt. or Lot #: [Redacted] City/Town: [Redacted] State: [Redacted] Zip Code: [Redacted]

3 Address Where You Get Your Mail If Different From Above: [Redacted] City/Town: [Redacted] State: [Redacted] Zip Code: [Redacted]

4 Date of Birth: [Redacted] (Month Day Year) 5 Telephone Number (optional): [Redacted]

6 ID Number - (See item 6 in the instructions for your state)
Last four digits SSN or Indiana DL or ID Number: [Redacted]

7 Choice of Party (see item 7 in the instructions for your State): [Redacted] 8 Race or Ethnic Group (see item 8 in the instructions for your State): [Redacted]

9 I have reviewed my state's instructions and I swear/affirm that:

- I am a United States citizen
- I meet the eligibility requirements of my state and subscribe to any oath required.
- The information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false

Please sign full name (or put mark) ▲

AFFIDAVIT OF JUAN RAMIREZ

Comes now Juan Ramirez, under the penalties for perjury, and swears or affirms as follows:

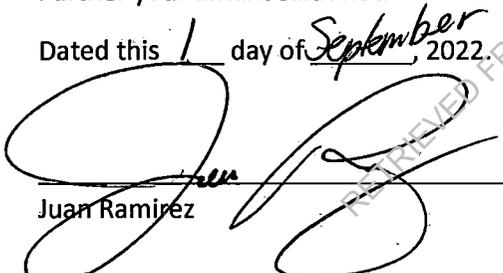
1. I am over 18 years of age and am competent to testify to the matters described herein.
2. I am a resident of Tippecanoe County, Indiana.
3. Since May 2020, I have been employed with the Tippecanoe County Board of Elections and Registration, appointed to the position by the Board upon nomination of the Republican County Chairman pursuant to IC 3-6-5.4-7.
4. In that position, among other duties, I process registration applications submitted to the Board.
5. I am in receipt of a letter from the co-director of the Indiana Election Division investigating a complaint submitted by the League of Women Voters of Greater Lafayette and Common Cause Indiana ("Complaint"). This affidavit is intended to respond to that letter.
6. The investigation letter requests information regarding the allegations in the Complaint, particularly having to do with "the procedures the Board of Elections and Registrations follows that would require a first-time voter in Indiana to provide proof of residency documentation after county registration officials process a federal or state paper voter registration form filed by mail or hand-delivery."
7. Attached as Exhibit A is the "Proof of Residency Report" from our systems. The Complaint references the period from 2018 to the present. The Proof of Residency Report reveals one person registered since 2018 who is flagged as being required to provide proof of residency. That individual's registration was received via the United States Postal Service and did not provide a driver's license number or last four digits of a social security number that matched an existing Indiana identification record or otherwise demonstrate an applicable exemption. (See SOP VRG 50.1.)
8. When our office receives paper registration applications, whether hand delivered or via the United States Postal Service (USPS), our practice is to verify the applicant's Social Security Number, Indiana Driver's License Number, or Indiana Identification Number (unless the applicant indicates that he or she does not have any of those.) Where those numbers do not match an existing record, the application is treated as incomplete and our office initiates efforts to contact the applicant by telephone, mail, and/or email depending on what contact information the applicant has provided. (See VRG 1.3). An Incomplete Registration could also arise from the applicant's failure to provide other required information (e.g. residence address, date of birth, statement of citizenship, and signature.)
9. No registration application has been rejected for failure to provide additional proof of residency, and as reflected in the "Proof of Residency Report," the only applicant registered after 2018 who is flagged as being required to provide additional residency documentation under IC 3-7-33-

4.5 is an individual whose application was received through the United States Postal Service. I was present in the office during a meeting between Germany Harris and Ken Jones, however, I was working on a different project at the time and did not hear the specifics of that discussion. In general, however, I am aware of exchanges between Germany Harris of this office, LWVGL, and the IED with respect to the proper interpretation of IC 3-7-33-4.5 and IC 3-7-22-9. Regardless of the arguments raised in that exchange, absent a change in the statutes or new guidance from IED, neither I nor this office intend to flag future applications received via a person presenting the form on behalf of another individual as requiring additional residency documentation under IC 3-7-33-4.5.

10. The Complaint alleges that, on May 13, 2022, the Tippecanoe County Board of Election and Registration rejected a voter's provisional ballot due to a failure by the voter to provide residency documentation. This is not accurate. No ballots were rejected at the May 13, 2022, meeting for failure to provide residency documentation. As reflected in the County Election Board Findings, two of the rejected provisional ballots attached to the Complaint at Exhibit E were rejected for the individual's failure to produce a valid form of voter identification and one was rejected because the voter abandoned the polling place to pursue the option of a write in candidate. Furthermore, I am unaware of ballots having been rejected by the Board at any other time for failure to provide residency documentation.

Further your affiant saith not.

Dated this 1 day of September, 2022.


Juan Ramirez

Proof of Residency Report

All Precincts

Tippecanoe County

<u>Name</u>	<u>Address</u>	<u>DOB</u>	<u>Reg Date</u>
E... JIMMIE	10 JOYE CT	04/24/1982	10/02/2000
MURPHY, MICHAEL	1309 HASP WAY	06/01/1990	10/15/2008
ABRAMS-HARRIS, ZYANNE	40 CORVETTE CT APT D	01/18/2000	05/24/2022
LEUCH, NICK	3204 LONGLOIS DR	11/21/1989	09/05/2008
HAMRICK, MELISSA	814 N 14TH ST APT 106	01/04/1978	03/16/2016
BARRETT, SARAH	127 S 27TH ST	02/03/1990	04/16/2008
THOMPSON, CASSANDRA	1632 SKYLINE RD	04/16/1989	10/12/2012
DEL REAL, DIANA	1101 HORNBEAM CIR E	09/03/1989	08/14/2008
GALBURTA, JOHN	2560 ECKMAN DR APT 12	04/23/1992	09/27/2016
MURILLO, CARINA	202 EQUESTRIAN DR	08/01/1981	10/15/2008
DAVENPORT, JOSEPH	6810 STATE ROAD 26 E	07/11/1954	04/16/2008
SWINDLE, SHON	11133 US HIGHWAY 231 S	10/01/1989	06/25/2008
DUNFORD, ALICE	6505 PIN OAKS DR	11/18/1934	10/03/2008
DOAN, ERIN	2410 SOLANO CT	05/23/1986	10/15/2008
LEITEM, DARL	2945 STATE ROAD 225 E	08/11/1985	09/30/2010
GEISLER, MICHAEL	3819 S 175 W	07/02/1964	08/27/1984
BENNETT, SANFORD	1300 W STADIUM AVE	08/14/1986	06/28/2008
JOHNSON, SARAH	801 DAVID ROSS RD	10/11/1986	04/16/2008
NELSON, BRADLEY	320 BROWN ST APT 622	05/23/1988	04/16/2008
MILLAR, JACOB	312 SHARON RD	04/09/1990	12/19/2008
BAWCUM, MICHAEL	640 N RUSSELL ST	11/15/1987	04/16/2008
BY...N, GREG	1160 W STADIUM AVE APT 400	11/24/1989	09/04/2008
HELMER, NADEZHDA	201 N MARTIN JISCHKE DR	06/14/1996	09/30/2015
JOHNSON, JAWANA	107 MACARTHUR DR	01/29/1989	04/16/2008
JUANG, WESLEY	201 N MARTIN JISCHKE DR APT SW	01/20/1994	09/27/2016
LEE, SEUNG SEOB	1016 W STADIUM AVE APT 1347	01/17/1988	09/04/2008
MARK, JOSHUA	1016 W STADIUM AVE	06/22/1991	07/22/2009
RISTICH, SAMUEL	1016 W STADIUM AVE	10/22/1989	09/06/2008
SCHIPPEN, MICHAEL	314 N RUSSELL ST # 25	03/26/1987	10/15/2008
FEE, JUSTEN	7436 TURNER RD	05/29/1989	04/16/2008
WANG, ANGEL	8720 W 700 S	04/01/1980	10/15/2008
GLOYESKE, REBECCA	3526 CANTERBURY DR	05/25/1990	04/13/2008
HUBBLE, RYAN	808 W 500 S	10/29/1987	10/07/2008

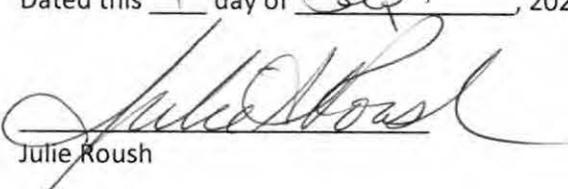
AFFIDAVIT OF JULIE ROUSH

Comes now Julie Roush, under the penalties for perjury, and swears or affirms as follows:

1. I am over 18 years of age and am competent to testify to the matters described herein.
2. I am a resident of Tippecanoe County, Indiana.
3. I have been provided with the complaint filed with the Indiana Election Division from the League of Women Voters of Greater Lafayette (LWVGL) and Common Cause.
4. During the time period relevant to the events described in the complaint, I have served as the County Clerk of Tippecanoe County and, by virtue of that office, as member of the Tippecanoe County Board of Election and Registration under IC 3-6-5.4-4(a)21).
5. The Complaint alleges that, on May 13, 2022, the Board rejected a voter's provisional ballot due to a failure by the voter to provide residency documentation. This is not accurate. No ballots were rejected at the May 13, 2022, meeting for failure to provide residency documentation. As reflected in the County Election Board Findings, two of the rejected provisional ballots attached to the Complaint at Exhibit E were rejected for the individual's failure to produce a valid form of voter identification and one was rejected because the voter abandoned the polling place to pursue the option of a write in candidate. Furthermore, I am unaware of ballots having been rejected by the Board at any other time for failure to provide residency documentation.
6. On August 5, 2022, I submitted a memorandum to the Indiana Election Division which is attached hereto as an Exhibit. I believe the information in the Memorandum to be true and correct subject to the following corrections:
 - a. The modified federal forms received in our office from LWVGL representatives had not been cut off. The partially cut off information at the bottom edge of the form was a function of how the form is scanned in our office. However, Box 6 of the federal forms were modified to say "Last 4 digits of SSN, IN Driver's License # or IN State ID." On August 22, 2022, our office received a federal form with a revised modification to Box 6 that now includes the text "Last 4 digits of Social Security Number."
 - b. Further review of the "Proof of Residency Report" reveals that there was no voter in the list registered in 2020. Only one voter registered in 2018 or after appears on the list, a voter who registered in 2022 whose voter registration application was received via the United States Postal Service and who was registered on May 24, 2022

Further your affiant saith not.

Dated this 1 day of Sept, 2022.


Julie Roush



Tippecanoe County Clerk of the Courts

301 Main Street • PO Box 1665, Lafayette, Indiana 47902

MEMORANDUM

TO: IED
FROM: TIPPECANOE COUNTY CLERK
DATE: 8/5/2022
RE: Complaint from League of Women Voters of Greater Lafayette under IC 3-7-11-3

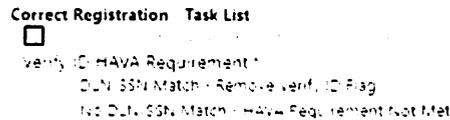
Dear Members of the Indiana Election Division:

On or about July 21, 2022, the League of Women Voters of Greater Lafayette submitted a complaint to the Indiana Election Division under IC 3-7-11-3 concerning the practices of the Tippecanoe County Board of Election and Registration. On July 27, 2022, the Tippecanoe County Attorney emailed the attorneys for the IED inquiring about the process, citing IC 3-7-11-6 suggesting that, if the IED determined that the complaint stated a claim, the next step would be an investigation. On July 27, 2022, Mr. Kochevar indicated that the IED had not yet discussed the process but that it would be helpful to identify a person to whom any IED request for information and responses should be directed.

Please let this Memorandum confirm that requests for information and responses should be directed to my attention. (Julie Roush, Tippecanoe County Clerk c/o Tippecanoe County Board of Elections and Registration, 20 N. 3rd Street, Lafayette, IN 47901; phone: 765-423-9724; email: jroush@tippecanoe.in.gov.)

I would also like to provide some background on the process used when the BER receives a voter registration application hand-delivered by a third party on behalf of a first-time voter. Upon review of our process, neither a third-party delivered voter registration application nor a USPS delivered registration application is flagged as needing additional proof of residence. In other words, while previous correspondence has indicated a theoretical belief that third-party delivered registrations should be treated the same as USPS delivered registrations (and other applications received by "mail" such as Federal Express or non-USPS couriers); the actual practice has been not to flag any of those registrations as needing additional documentation. Rather, the BER has checked the Driver's License Number or Social Security information provided on the registration application (whether delivered by third party or by USPS) against the data base in SVRS. If that check matches the applicant to the number, the BER processes the registration as complete. If the check does not match the applicant to the number, regardless of the manner of delivery, the BER conducts follow up to determine the cause of the mismatch. The BER will attempt to contact the applicant by mail and by

phone (if applicable) in order to obtain or correct a missing or incorrect SSN or DLN. If the BER is not able to obtain correct information, the registration is assigned a voter ID number and processed before the next election. (According to INSVRS Help Desk, there is no flag in SVRS that states “proof of residence is needed”. The only flag available is, “Verify ID”.) By clicking on the DLN/SSN Match in the system, no flag will be added to the voter’s registration.



It should be noted that there was a period of time in February and March of 2022 a member of the BER staff thought all third-party and USPS delivered applications were automatically marked as needing additional proof of residency and shared this incorrect information with a member of the League of Women Voters. In March, it was explained to the staff member that the system does not automatically require proof of residency, especially when there is an SSN or DLN match. The conversation with the League seems to have been triggered by forms of voter registration that had been modified from the federal form such that the portion that states “If you are registering to vote for the first time please refer to the application instructions on submitting copies of identification documents with this form” had been partially cut off along with the sections below that statement. Additionally, Box 6 of the federal form had been modified to add text that says “Last 4 digits of SSN, IN Driver’s License # or IN State ID.” (See attachments). The outcome of this alteration was the BER staff had to contact registrants to retrieve all 10 digits of their Indiana ID numbers in order to register the new voters. However, this did not result in any applicant’s registration being incorrectly flagged.

It appears our manner of processing applications received via USPS is more permissive than the law requires, however, as relevant to the LWV complaint, our manner of processing applications received via third party is not more restrictive than permitted under IC 3-7-33-4.5, IC 3-7-22-9, or NVRA.

On 8/1/2022, I ran the *Proof of Residency* report, and found that 33 voters were on it. Only one voter on the list registered in 2022, after the May election, and another one in 2020. Other than those two registrants, none of the others were from 2018 or after. Twenty-three of them were from 2008. (See attached list.) The one that registered in 2022 by mail did not provide a DLN and their SSN did not show a match in the system. Correspondence was sent out requesting the missing and/or incorrect information, but nothing was sent back. No working phone number was provided. Regardless, the registrant’s application was processed and completed, but with the “Verify ID” flag.

I also looked at the list of Incomplete Registrations listed in the Hopper in SVRS. That list showed that 21 registrants were incomplete. This list is not specific to mail-in or

third-party delivered registrations. In most cases, the reason for the incompleteness is that the given SSN or DLN either did not match any record in SVRS or were missing entirely. While researching the present complaint, I was able to contact one incomplete registrant who hadn't responded to previous contact attempts. His SSN did not match. When I contacted him, he advised that he made up a SSN because he did not remember it and that he was not a U.S. citizen. He said he filled out an application at a local high school because, "the guy and [his] friends pressured him to apply." His registration was canceled. Efforts to contact the remaining individuals on the Incomplete Registration list continue.

Based on the above, we believe that there has been no violation of NVRA. We would therefore respectfully request a determination of no violation under IC 3-7-11-5 or IC 3-7-11-8.

Sincerely,

A handwritten signature in cursive script, appearing to read "Julie A. Roush".

Julie A. Roush
Tippecanoe County Clerk

Attachment 1: Modified Federal Form and Original Federal Form

Attachment 2: Proof of Residency Report

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**MODIFIED FEDERAL FORM RECEIVED BY
TIPPECANOE BOARD OF ELECTION AND REGISTRATION**

RETRIEVED FROM DEMOCRACYDOCKET.COM

Processed

Voter Registration Application

Before completing this form, review the General, Application, and State specific instructions.

Are you a citizen of the United States of America? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Will you be 18 years old on or before election day? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If you checked "No" in response to either of these questions, do not complete form. (Please see state-specific instructions for rules regarding eligibility to register prior to age 18.)		This space for office use only.			
1	<input type="checkbox"/> Mr. <input checked="" type="checkbox"/> Miss <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms.	Last Name	First Name Middle Name(s)	<input type="checkbox"/> Jr <input type="checkbox"/> II <input type="checkbox"/> Sr <input type="checkbox"/> IV	
2	Home Address	Apt. or Lot #	City/Town	State	Zip Code
			Lafayette	IN	47905
3	Address Where You Get Your Mail If Different From Above		City/Town	State	Zip Code
4	Date of Birth	Telephone Number (optional)	ID Number - (See Item 6 in the instructions for your state) Last 4 digits of SSN, IN Driver's license # or IN State ID #		
	Month Day Year		6 [Redacted] <i>asky...</i>		
X	Choice of Party (see Item 7 in the instructions for your State)	X	Race or Ethnic Group (see Item 8 in the instructions for your State)		
9	I have reviewed my state's Instructions and I swear/affirm that: <input type="checkbox"/> I am a United States citizen <input type="checkbox"/> I meet the eligibility requirements of my state and subscribe to any oath required. <input checked="" type="checkbox"/> The information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false information, I may be fined, imprisoned, or (if not a U.S. citizen) deported from or refused entry to the United States.		11 [Redacted Signature]		
			Please sign full name (or put mark) ^		
	Date:		3 / 4 / 22		
			Month Day Year		

If you are registering to vote for the first time: please refer to the application instructions for information on submitting

RETRIEVED FROM DEMOCRACYCKET.COM

Voter Registration Application

Before completing this form, review the General, Application, and State specific instructions.

Are you a citizen of the United States of America? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Will you be 18 years old on or before election day? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If you checked "No" in response to either of these questions, do not complete form. (Please see state-specific instructions for rules regarding eligibility to register prior to age 18.)		This space for office use only.			
1	<input type="checkbox"/> Mr. <input checked="" type="checkbox"/> Miss <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms:	Last Name: [REDACTED] First Name: [REDACTED]	Middle Name(s): [REDACTED]	<input type="checkbox"/> Jr <input type="checkbox"/> II <input type="checkbox"/> Sr <input type="checkbox"/> IV	
2	Home Address	Apt. or Lot #	City/Town	State	Zip Code
	[REDACTED]		[REDACTED]	IN	47905
3	Address Where You Get Your Mail If Different From Above		City/Town	State	Zip Code
4	Date of Birth		5 Telephone Number (optional)	6 ID Number - (See item 6 in the instructions for your state) Last four digits SSN or Indiana DL or ID Number	
	Month Day Year [REDACTED]		[REDACTED]	[REDACTED]	
7	Choice of Party (See item 7 in the instructions for your State)		8 Race or Ethnic Group (See item 8 in the instructions for your State)		
9	I have reviewed my state's instructions and I swear/affirm that: <input type="checkbox"/> I am a United States citizen <input type="checkbox"/> I meet the eligibility requirements of my state and subscribe to any oath required. <input type="checkbox"/> The information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false information, I may be fined, imprisoned, or (if not a U.S. citizen) deported from or refused entry to the United States.			Please sign full name (or put mark) 	
				Date: <u>11</u> / <u>19</u> / <u>21</u> Month Day Year	

If you are registering to vote for the first time: please refer to the application instructions for information on submitting copies of valid identification documents with this form

RETRIEVED FROM DEMOCRACYDOCKET.COM

FEDERAL FORM WITH INDIANA STATE INSTRUCTION

RETRIEVED FROM DEMOCRACYDOCKET.COM

Voter Registration Application

Before completing this form, review the General, Application, and State specific instructions.

Are you a citizen of the United States of America? <input type="checkbox"/> Yes <input type="checkbox"/> No Will you be 18 years old on or before election day? <input type="checkbox"/> Yes <input type="checkbox"/> No If you checked "No" in response to either of these questions, do not complete form. (Please see state-specific instructions for rules regarding eligibility to register prior to age 18.)		This space for office use only.			
1	<input type="checkbox"/> Mr. <input type="checkbox"/> Miss <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms.	Last Name	First Name	Middle Name(s)	<input type="checkbox"/> Jr <input type="checkbox"/> II <input type="checkbox"/> Sr <input type="checkbox"/> III <input type="checkbox"/> IV
2	Home Address		Apt. or Lot #	City/Town	State
3	Address Where You Get Your Mail If Different From Above			City/Town	State
4	Date of Birth		5 Telephone Number (optional)	6 ID Number - (See item 6 in the instructions for your state)	
		_____ Month Day Year			
7	Choice of Party <small>(see item 7 in the instructions for your State)</small>		8 Race or Ethnic Group <small>(see item 8 in the instructions for your State)</small>		
9	I have reviewed my state's instructions and I swear/affirm that: <ul style="list-style-type: none"> ■ I am a United States citizen ■ I meet the eligibility requirements of my state and subscribe to any oath required. ■ The information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false information, I may be fined, imprisoned, or (if not a U.S. citizen) deported from or refused entry to the United States. 				
Please sign full name (or put mark) ▲					
Date: _____ Month Day Year					

If you are registering to vote for the first time: please refer to the application instructions for information on submitting copies of valid identification documents with this form.

Please fill out the sections below if they apply to you.

If this application is for a change of name, what was your name before you changed it?

A	<input type="checkbox"/> Mr. <input type="checkbox"/> Miss <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms.	Last Name	First Name	Middle Name(s)	<input type="checkbox"/> Jr <input type="checkbox"/> II <input type="checkbox"/> Sr <input type="checkbox"/> III <input type="checkbox"/> IV
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If you were registered before but this is the first time you are registering from the address in Box 2, what was your address where you were registered before?

B	Street (or route and box number)	Apt. or Lot #	City/Town/County	State	Zip Code
---	----------------------------------	---------------	------------------	-------	----------

If you live in a rural area but do not have a street number, or if you have no address, please show on the map where you live.

C	Write in the names of the crossroads (or streets) nearest to where you live. Draw an X to show where you live. Use a dot to show any schools, churches, stores, or other landmarks near where you live, and write the name of the landmark.		NORTH ↑
	Example _____ _____ Public School ●	Route #2	● Grocery Store Woodchuck Road _____ _____ X

If the applicant is unable to sign, who helped the applicant fill out this application? Give name, address and phone number (phone number optional).

D	
---	--

Mail this application to the address provided for your State.

State Instructions

- be at least 18 years old
- not have been convicted of a felony, and without having been restored to the rights of citizenship, or confined in prison on conviction of a criminal offense

Mailing address:

Secretary of State
P.O. Box 83720
State Capitol Bldg.
Boise, ID 83720-0080

Illinois

Updated: 09-03-2019

Registration Deadline — Online Registration is available until 16 days before the election and in-person registration is available through Election Day.

6. ID Number. Illinois requires either the Driver's License (or Secretary of State ID Card) or the last 4 digits of Social Security Number. For people who do not have either of those items, and have not registered in Illinois before, a mail in registration form should be accompanied by a copy of other identifying information: you must send, with this application, either (i) a copy of a current and valid photo identification, or (ii) a copy of a current utility bill, bank statement, government check, paycheck, or other government document that shows the name and address of the voter. If you do not provide the information required above, then you will be required to provide election officials with either (i) or (ii) described above the first time you vote at a voting place.

7. Choice of Party. Leave Blank. Exception: for primary elections, unless a voter only wishes to vote on

public questions, a party preference should be indicated.

8. Race or Ethnic Group. Leave blank.

9. Signature. A signature is required. If signature is missing from registration form, you will be notified your registration is incomplete.

To register in Illinois you must:

- be a citizen of the United States
- be a resident of Illinois and of your election precinct at least 30 days before the next election
- be at least 18 years old on or before the next General Election or Consolidated Election
- cannot be serving a sentence of confinement in any penal institution as a result of conviction of any crime
- not claim the right to vote anywhere else

Preregistration for 17 Year Olds. Illinois permits registration by a 17 year old person who will be 18 on or before the General Election (or the Consolidated Election, the odd year election for city, township, school board and other local offices) to register and vote in the General Primary (or Consolidated Primary) which will nominate candidates for that next following General Election (or Consolidated Election).

Mailing address:

State Board of Elections
2329 S. MacArthur Boulevard
Springfield, IL 62704

Indiana

Updated: 03-01-2006

Registration Deadline — 29 days before the election.

6. ID Number. Your state voter ID number is your ten digit Indiana issued driver's license number. If you do not possess an Indiana driver's license then provide the last four digits of your social security number. Please indicate which number was provided. (Indiana Code 3-7-13-13)

7. Choice of Party. Leave blank.

8. Race or Ethnic Group. Leave blank.

9. Signature. To register in Indiana you must:

- be a citizen of the United States
- have resided in the precinct at least 30 days before the next election
- be at least 18 years of age on the day of the next general election
- not currently be in jail for a criminal conviction

Mailing address:

Election Division
Office of the Secretary of State
302 West Washington Street,
Room E-204
Indianapolis, IN 46204-2743

Iowa

Updated: 10-31-2020

Registration Deadline — Must be delivered by 5 p.m. 10 days before the election, if it is a general election; 11 days before all others.* Registration forms which are postmarked 15 or more days before an election are considered on time even if received after the deadline.

*If you fail to meet the voter registration deadlines above you can register and vote by following the guidelines for election day registration. You can find these on the Iowa Secretary of State's website: <https://sos.iowa.gov/elections/voterinformation/edr.html>.

Proof of Residency Report

All Precincts

Tippecanoe County

<u>Name</u>	<u>Address</u>	<u>DOB</u>	<u>Reg Date</u>
ELOFF, JIMMIE	10 JOYE CT	04/24/1982	10/02/2000
MURPHY, MICHAEL	1309 HASP WAY	06/01/1990	10/15/2008
ABRAMS-HARRIS, ZYANNE	40 CORVETTE CT APT D	01/18/2000	05/24/2022
LEUCH, NICK	3204 LONGLOIS DR	11/21/1989	09/05/2008
HAMRICK, MELISSA	814 N 14TH ST APT 106	01/04/1978	03/16/2016
BARRETT, SARAH	127 S 27TH ST	02/03/1990	04/16/2008
THOMPSON, CASSANDRA	1632 SKYLINE RD	04/16/1989	10/12/2012
DEL REAL, DIANA	1101 HORNBEAM CIR E	09/03/1989	08/14/2008
GALBURTA, JOHN	2560 ECKMAN DR APT 12	04/23/1992	09/27/2016
MURILLO, CARINA	202 EQUESTRIAN DR	08/01/1981	10/15/2008
DAVENPORT, JOSEPH	6810 STATE ROAD 26 E	07/11/1954	04/16/2008
SWINDLE, SHON	11133 US HIGHWAY 231 S	10/01/1989	06/25/2008
DUNFORD, ALICE	6505 PIN OAKS DR	11/18/1934	10/03/2008
DOAN, ERIN	2410 SOLANO CT	05/23/1986	10/15/2008
LEITEM, DARL	2945 STATE ROAD 225 E	08/11/1985	09/30/2010
GEISLER, MICHAEL	3819 S 175 W	07/02/1964	08/27/1984
BENNETT, SANFORD	1300 W STADIUM AVE	08/14/1986	06/28/2008
JOHNSON, SARAH	801 DAVID ROSS RD	10/11/1986	04/16/2008
NELSON, BRADLEY	320 BROWN ST APT 622	05/23/1988	04/16/2008
MILLAR, JACOB	312 SHARON RD	04/09/1990	12/19/2008
BAWCUM, MICHAEL	640 N RUSSELL ST	11/15/1987	04/16/2008
BROWN, GREG	1160 W STADIUM AVE APT 400	11/24/1989	09/04/2008
HELMER, NADEZHDA	201 N MARTIN JISCHKE DR	06/14/1996	09/30/2015
JOHNSON, JAWANA	107 MACARTHUR DR	01/29/1989	04/16/2008
JUANG, WESLEY	201 N MARTIN JISCHKE DR APT SW	01/20/1994	09/27/2016
LEE, SEUNG SEOB	1016 W STADIUM AVE APT 1347	01/17/1988	09/04/2008
MARK, JOSHUA	1016 W STADIUM AVE	06/22/1991	07/22/2009
RISTICH, SAMUEL	1016 W STADIUM AVE	10/22/1989	09/06/2008
SCHIPPEN, MICHAEL	314 N RUSSELL ST # 25	03/26/1987	10/15/2008
FEE, JUSTEN	7436 TURNER RD	05/29/1989	04/16/2008
WANG, ANGEL	8720 W 700 S	04/01/1980	10/15/2008
GLOYESKE, REBECCA	3526 CANTERBURY DR	05/25/1990	04/13/2008
HUBBLE, RYAN	808 W 500 S	10/29/1987	10/07/2008

EXHIBIT F



CHALLENGE AFFIDAVIT OF A VOTER BY A CHALLENGER OR MEMBER OF THE PRECINCT ELECTION BOARD / AFFIDAVIT OF A CHALLENGED VOTER

(PRE-4)

State Form 42132 (R14 / 3-22)
Indiana Election Division (IC 3-11-8-21; 3-11-8-23.5; 3-11.5-4-13.5; 3-11.5-4-13.6)

Is this an absentee ballot? Yes No

INSTRUCTIONS: After the challenger completes this side of the form, the challenged voter may complete the second page of this form. If the challenged voter does so, the challenged voter is entitled to cast a provisional ballot. Do not use this form to challenge a voter at a primary election due to the voter's party affiliation. Use PRE-6 form instead.
NOTE: THIS FORM MUST BE PRINTED DIRECTLY ON THE PRO-2 PROVISIONAL BALLOT SECURITY ENVELOPE.

STATE OF INDIANA, COUNTY OF TIPPECANOE

GENERAL INFORMATION

I, the undersigned, believe that Gisselle H. Acuna, now offering to vote, is not a legal voter in this precinct, for the following reason(s):
(Insert name of voter.)

Voter Eligibility - Fail Safe Procedures

- This voter's name is not included on the poll list, and is NOT entitled to vote by using a "Fail Safe" procedure.
- This voter's name is included on the poll list, but this voter does not currently reside in the precinct, and is NOT entitled to vote in this precinct by completing a VRG-4/12 form or a VRG-15 form, or other "Fail Safe" procedure.

Voter Identification

- This voter was unable or declined to present proof of identification when required by law to do so.
- This voter is identified on the poll list as required to present an additional document that confirms the voter's identity and current residence address, but has not done so.

Voter Eligibility - General Requirements

- This voter is not a U.S. citizen.
- This voter will not be eighteen (18) years of age or older at the general election.
- This voter's signature on the election day poll list does not match the signature on the voter's registration record.
- This voter's signature on the absentee ballot security envelope affidavit is missing or does not match the signature on the voter's absentee ballot application, electronic poll book, or registration record maintained in the statewide voter registration system.
- Other _____
(Insert specific reason for challenging voter.)

I obtained the information from _____
(Insert name of person(s) supplying information for challenge.)

CHALLENGER AFFIRMATION

I swear (or affirm) that the foregoing statements are true, to the best of my knowledge and belief, and understand that making a false statement on this affidavit is punishable under the penalties of perjury.

Signature of challenger <u>Michael Kaiser</u>	Printed name <u>Michael Kaiser</u>	If serving as precinct officer: <input checked="" type="checkbox"/> Inspector <input type="checkbox"/> Judge <input type="checkbox"/> Poll Clerk
Precinct	Township or ward	City or town

AFFIRMATION OF AFFIDAVIT

STATE OF INDIANA)
COUNTY OF TIPPECANOE)

I swear (or affirm) that the above challenge affidavit of a voter was subscribed and sworn to before me this 3 day of May, 2022.

Signature of Official Administering Oath (Inspector, Judge, Poll Clerk, Sheriff, or Absentee Board Member Other than Challenger above)
Brian King

Printed Name and Title
Brian King Poll Clerk

AFFIDAVIT OF A CHALLENGED VOTER

STATE OF INDIANA, COUNTY OF INDIANA

GENERAL INFORMATION

I, the undersigned, state the following:

- that I am a citizen of the United States.
- that my date of birth is 01 / 04 / 1980 (mm/dd/yy) to the best of my information and belief.
- that I have been a bona fide resident of this precinct for thirty (30) days immediately before this election or I am qualified to vote in this precinct under IC 3-10-10, IC 3-10-11, or IC 3-10-12.
- that I am generally known by the name in which I desire to vote, which is Gisselle H. Acuna
- that I have not voted and will not vote in any other precinct in this election.
- that my present residence address is 521 S. 5th St. Lafayette, IN 47905
(and, if applicable, my residence address thirty (30) days before this election was at: _____)
I moved to my residence address in this precinct on the following date: 10 / 29 / 2020 (mm/dd/yy)
- that, if applicable, if I was challenged under boxes 3 or 4 on the Affidavit of a Voter By a Challenger portion of this form, I did present proof of identification or additional documentation that complied with IC 3-5-2-40.5 or IC 3-7-33-4.5.

CHALLENGED VOTER AFFIRMATION

I swear (or affirm) that the foregoing statements are true, to the best of my knowledge and belief, and understand that making a false statement on this affidavit is punishable under the penalties of perjury.

Signature of challenged voter <u>Gisselle H. Acuna</u>	Printed name <u>Gisselle H. Acuna</u>	
Precinct <u>20</u>	Township or ward <u>Fairfield</u>	City or town <u>Lafayette</u>

AFFIRMATION OF AFFIDAVIT

STATE OF INDIANA)
COUNTY OF TIPPECANOE)

I swear (or affirm) that the above challenge affidavit of a voter was subscribed and sworn to before me this 3 day of May, 2022.

Signature of Official Administering Oath (Inspector, Judge, Poll Clerk, Sheriff, or Absentee Board Member Other than Challenger above)
William L Lapcheska

Printed Name and Title
William L Lapcheska



PROVISIONAL BALLOT SECURITY ENVELOPE
 Part of State Form 42132 (R14 / 3-22)
 Indiana Election Division (IC 3-11.7-1-8; 3-11.7-5-3; 3-11.5-4-13.5; 3-11.5-4-13.6)

(PRO-2)

TO THE VOTER

READ CAREFULLY AND FOLLOW THE INSTRUCTIONS BELOW.

STATE OF INDIANA)
)
 COUNTY OF TIPPECANOE)

I, (Print your name and address below.)

Name of Voter: Gisselle H Aana

Residence Address of Voter (number and street, city, state, and ZIP code):

521 S 3rd St, Lafayette, IN 47905

Telephone number (optional): () - -

have cast the enclosed provisional ballot at Precinct Name: Fairfield 20

at the (select one) PRIMARY GENERAL MUNICIPAL SPECIAL ELECTION

to be held on

May 3rd, 2022
 (Insert date (mm/dd/yy) of election.)

Signature of voter	Date signed (mm/dd/yy) ____/____/____
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COUNTY ELECTION BOARD FINDINGS

NOTE: Absentee voters voting by mail or traveling board do not complete PRO-2 because the application serves as the voter's response to the challenge.

The enclosed provisional ballot is determined to be:

Valid
 Invalid due to the following reason: Voter Failed to produce a valid form of voter ID, under IC 3-5-2-40.5, at the time of both casting a vote on election day and the time necessary for the completion of this provisional ballot.

If invalid, this envelope may not be opened, and this ballot may not be counted.

Dated (mm/dd/yy): 5/13/22

Tippecanoe County Election Board

TO THE PROVISIONAL BALLOT COUNTERS: After the ballot has been found valid by the county election board, open this envelope carefully. Do not deface or destroy the affidavit or the envelope. Take out the ballot enclosed for processing. If the ballot does not contain the initials of the poll clerks, the ballot shall, without being unfolded to disclose how the ballot is marked, be endorsed with the word "Rejected" and enclosed in State Form PRO-7 envelope.



CHALLENGE AFFIDAVIT OF A VOTER BY A CHALLENGER OR MEMBER OF THE PRECINCT ELECTION BOARD / AFFIDAVIT OF A CHALLENGED VOTER

(PRE-4)

State Form 42132 (R14 / 3-22)
Indiana Election Division (IC 3-11-8-21; 3-11-8-23.5; 3-11.5-4-13.5; 3-11.5-4-13.6)

Is this an absentee ballot? Yes No

INSTRUCTIONS: After the challenger completes this side of the form, the challenged voter may complete the second page of this form. If the challenged voter does so, the challenged voter is entitled to cast a provisional ballot. Do not use this form to challenge a voter at a primary election due to the voter's party affiliation. Use PRE-6 form instead.
NOTE: THIS FORM MUST BE PRINTED DIRECTLY ON THE PRO-2 PROVISIONAL BALLOT SECURITY ENVELOPE.

STATE OF INDIANA, COUNTY OF TIPPECANOE

GENERAL INFORMATION

I, the undersigned, believe that Kirk Freeman, now offering to vote, is not a legal voter in this precinct, for the following reason(s):
(Insert name of voter.)

Voter Eligibility - Fail Safe Procedures

- 1. This voter's name is not included on the poll list, and is NOT entitled to vote by using a "Fail Safe" procedure.
- 2. This voter's name is included on the poll list, but this voter does not currently reside in the precinct, and is NOT entitled to vote in this precinct by completing a VRG-4/12 form or a VRG-15 form, or other "Fail Safe" procedure.

Voter Identification

- 3. This voter was unable or declined to present proof of identification when required by law to do so.
- 4. This voter is identified on the poll list as required to present an additional document that confirms the voter's identity and current residence address, but has not done so.

Voter Eligibility - General Requirements

- 5. This voter is not a U.S. citizen.
- 6. This voter will not be eighteen (18) years of age or older at the general election.
- 7. This voter's signature on the election day poll list does not match the signature on the voter's registration record.
- 8. This voter's signature on the absentee ballot security envelope affidavit is missing or does not match the signature on the voter's absentee ballot application, electronic poll book, or registration record maintained in the statewide voter registration system.
- 9. Other Advised ABS polling station & no statutory provision for primary 'write-in'
(Insert specific reason for challenging voter.)

I obtained the information from Mike Smith
(Insert name of person(s) supplying information for challenge.)

CHALLENGER AFFIRMATION

I swear (or affirm) that the foregoing statements are true, to the best of my knowledge and belief, and understand that making a false statement on this affidavit is punishable under the penalties of perjury.

Signature of challenger	Printed name <u>Gorman Harris</u>	If serving as precinct officer: <input checked="" type="checkbox"/> Inspector <input type="checkbox"/> Judge <input type="checkbox"/> Poll Clerk
Precinct <u>Wabash 116</u>	Township or ward <u>Wabash</u>	City or town <u>West Lafayette</u>

AFFIRMATION OF AFFIDAVIT

STATE OF INDIANA)
COUNTY OF TIPPECANOE)
I swear (or affirm) that the above challenge affidavit of a voter was subscribed and sworn to before me this 19th day of April, 2022
Jun Kamikere Z, Board Staff
Signature of Official Administering Oath (Inspector, Judge, Poll Clerk, Sheriff, or Absentee Board Member Other than Challenger above) Printed Name and Title

AFFIDAVIT OF A CHALLENGED VOTER

STATE OF INDIANA, COUNTY OF INDIANA

GENERAL INFORMATION

- I, the undersigned, state the following:
- 1. that I am a citizen of the United States
 - 2. that my date of birth is 06 / 29 / 1968 (mm/dd/yy) to the best of my information and belief.
 - 3. that I have been a bona fide resident of this precinct for thirty (30) days immediately before this election or I am qualified to vote in this precinct under IC 3-10-10, IC 3-10-11, or IC 3-10-12.
 - 4. that I am generally known by the name in which I desire to vote, which is KIRK S. FREEMAN
 - 5. that I have not voted and will not vote in any other precinct in this election.
 - 6. that my present residence address is 1200 Redway Avenue, Lafayette, Indiana 47904
(and, if applicable, my residence address thirty (30) days before this election was at: _____)
I moved to my residence address in this precinct on the following date: _____ (mm/dd/yy)
 - 7. that, if applicable, if I was challenged under boxes 3 or 4 on the Affidavit of a Voter By a Challenger portion of this form, I did present proof of identification or additional documentation that complied with IC 3-5-2-40.5 or IC 3-7-33-4.5.

CHALLENGED VOTER AFFIRMATION

I swear (or affirm) that the foregoing statements are true, to the best of my knowledge and belief, and understand that making a false statement on this affidavit is punishable under the penalties of perjury.

Signature of challenged voter	Printed name <u>KIRK S. FREEMAN</u>
Precinct <u>Fairfield-11</u>	City or town <u>LAFAYETTE</u>

AFFIRMATION OF AFFIDAVIT

STATE OF INDIANA)
COUNTY OF TIPPECANOE)
I swear (or affirm) that the above challenge affidavit of a voter was subscribed and sworn to before me this 19 day of April, 2022
Julie Roush, Clerk
Signature of Official Administering Oath (Inspector, Judge, Poll Clerk, Sheriff, or Absentee Board Member Other than Challenger above) Printed Name and Title



PROVISIONAL BALLOT SECURITY ENVELOPE
 Part of State Form 42132 (R14 / 3-22)
 Indiana Election Division (IC 3-11.7-1-8; 3-11.7-5-3; 3-11.5-4-13.5; 3-11.5-4-13.6)

(PRO-2)

TO THE VOTER

READ CAREFULLY AND FOLLOW THE INSTRUCTIONS BELOW.

STATE OF INDIANA

COUNTY OF TIPPECANOE

KIRK STEPHENSON FREEMAN
 1200 RIDGEWAY AVE
 LAFAYETTE, IN 47904-2455

FF 11

I, (Print your name and address below.)

Name of Voter: KIRK S. FREEMAN



Residence Address of Voter (number and street, city, state, and ZIP code):

1200 Ridgeway Avenue

Telephone number (optional): (765) 429-7035

have cast the enclosed provisional ballot at Precinct Name: _____

at the (select one)

PRIMARY

GENERAL

MUNICIPAL

SPECIAL ELECTION

to be held on:

04/19/22

(Insert date (mm/dd/yy) of election.)

Signature of voter

[Handwritten Signature]

Date signed (mm/dd/yy)

04.19.2022

COUNTY ELECTION BOARD FINDINGS

NOTE: Absentee voters voting by mail or traveling board do not complete PRO-2 because the application serves as the voter's response to the challenge.

The enclosed provisional ballot is determined to be:

Valid

Invalid due to the following reason: voter abandoned polling place to pursue the option of a 'write in'.

If invalid, this envelope may not be opened, and this ballot may not be counted.

Dated (mm/dd/yy): 03/13/22

Tippecanoe

County Election Board

TO THE PROVISIONAL BALLOT COUNTERS: After the ballot has been found valid by the county election board, open this envelope carefully. Do not deface or destroy the affidavit or the envelope. Take out the ballot enclosed for processing. If the ballot does not contain the initials of the poll clerks, the ballot shall, without being unfolded to disclose how the ballot is marked, be endorsed with the word "Rejected" and enclosed in State Form PRO-7 envelope.



CHALLENGE AFFIDAVIT OF A VOTER BY A CHALLENGER OR MEMBER OF THE PRECINCT ELECTION BOARD / AFFIDAVIT OF A CHALLENGED VOTER

(PRE-4)

State Form 42132 (R14 / 3-22)
Indiana Election Division (IC 3-11-8-21; 3-11-8-23.5; 3-11.5-4-13.5; 3-11.5-4-13.6)

Is this an absentee ballot? Yes No

INSTRUCTIONS: After the challenger completes this side of the form, the challenged voter may complete the second page of this form. If the challenged voter does so, the challenged voter is entitled to cast a provisional ballot. Do not use this form to challenge a voter at a primary election due to the voter's party affiliation. Use PRE-6 form instead.
NOTE: THIS FORM MUST BE PRINTED DIRECTLY ON THE PRO-2 PROVISIONAL BALLOT SECURITY ENVELOPE.

STATE OF INDIANA, COUNTY OF TIPPECANOE

GENERAL INFORMATION

I, the undersigned, believe that Charlotte R. Herbert, now offering to vote, is not a legal voter in this precinct, for the following reason(s):
(Insert name of voter.)

- Voter Eligibility - Fail Safe Procedures**
- This voter's name is not included on the poll list, and is NOT entitled to vote by using a "Fail Safe" procedure.
 - This voter's name is included on the poll list, but this voter does not currently reside in the precinct, and is NOT entitled to vote in this precinct by completing a VRG-4/12 form or a VRG-15 form, or other "Fail Safe" procedure.

- Voter Identification** *Poll worker scratch out and corrected.*
- This voter was unable or declined to present proof of identification when required by law to do so.
 - This voter is identified on the poll list as required to present an additional document that confirms the voter's identity and current residence address, but has not done so.

- Voter Eligibility - General Requirements**
- This voter is not a U.S. citizen.
 - This voter will not be eighteen (18) years of age or older at the general election.
 - This voter's signature on the election day poll list does not match the signature on the voter's registration record.
 - This voter's signature on the absentee ballot security envelope affidavit is missing or does not match the signature on the voter's absentee ballot application, electronic poll book, or registration record maintained in the statewide voter registration system.
 - Other _____

(Insert specific reason for challenging voter.)

I obtained the information from _____
(Insert name of person(s) supplying information for challenge.)

CHALLENGER AFFIRMATION

I swear (or affirm) that the foregoing statements are true, to the best of my knowledge and belief, and understand that making a false statement on this affidavit is punishable under the penalties of perjury.

Signature of challenger <u>Michael Kaiser</u>	Printed name <u>Michael Kaiser</u>	If serving as precinct officer: <input checked="" type="checkbox"/> Inspector <input type="checkbox"/> Judge <input type="checkbox"/> Poll Clerk
Precinct <u>04</u>	Township or ward <u>Fairfield</u>	City or town <u>Lafayette</u>

AFFIRMATION OF AFFIDAVIT

STATE OF INDIANA)
COUNTY OF TIPPECANOE)
I swear (or affirm) that the above challenge affidavit of a voter was subscribed and sworn to before me this 3 day of May, 2022.
Ben Hunt Brian Leung Bill Worke
Signature of Official Administering Oath (Inspector, Judge, Poll Clerk, Sheriff, or Absentee Board Member Other than Challenger above) Printed Name and Title

AFFIDAVIT OF A CHALLENGED VOTER

STATE OF INDIANA, COUNTY OF INDIANA

GENERAL INFORMATION

- I, the undersigned, state the following:
- that I am a citizen of the United States.
 - that my date of birth is 09 / 01 / 1995 (mm/dd/yy) to the best of my information and belief.
 - that I have been a bona fide resident of this precinct for thirty (30) days immediately before this election or I am qualified to vote in this precinct under IC 3-10-10, IC 3-10-11, or IC 3-10-12.
 - that I am generally known by the name in which I desire to vote, which is Charlotte R Herbert
 - that I have not voted and will not vote in any other precinct in this election.
 - that my present residence address is 1732 N 9th St, Lafayette IN, 47904
(and, if applicable, my residence address thirty (30) days before this election was at: _____)
I moved to my residence address in this precinct on the following date: 08 / 01 / 2020 (mm/dd/yy)
 - that, if applicable, if I was challenged under boxes 3 or 4 on the Affidavit of a Voter By a Challenger portion of this form, I did present proof of identification or additional documentation that complied with IC 3-5-2-40.5 or IC 3-7-33-4.5.

CHALLENGED VOTER AFFIRMATION

I swear (or affirm) that the foregoing statements are true, to the best of my knowledge and belief, and understand that making a false statement on this affidavit is punishable under the penalties of perjury.

Signature of challenged voter <u>Charlotte R Herbert</u>	Printed name <u>Charlotte R Herbert</u>
Precinct <u>04</u>	Township or ward <u>Fairfield</u> City or town <u>Lafayette</u>

AFFIRMATION OF AFFIDAVIT

STATE OF INDIANA)
COUNTY OF TIPPECANOE)
I swear (or affirm) that the above challenge affidavit of a voter was subscribed and sworn to before me this 3 day of May, 2022.
Ben Hunt Joseph Knight Lead Judge
Signature of Official Administering Oath (Inspector, Judge, Poll Clerk, Sheriff, or Absentee Board Member Other than Challenger above) Printed Name and Title



PROVISIONAL BALLOT SECURITY ENVELOPE

Part of State Form 42132 (R14 / 3-22)
Indiana Election Division (IC 3-11.7-1-8; 3-11.7-5-3; 3-11.5-4-13.5; 3-11.5-4-13.6)

(PRO-2)

TO THE VOTER

READ CAREFULLY AND FOLLOW THE INSTRUCTIONS BELOW.

STATE OF INDIANA)
COUNTY OF TIPPECANOE)

I, (Print your name and address below.)

Name of Voter: Charlotte Rose Heibert

Residence Address of Voter (number and street, city, state, and ZIP code):

1732 N 9th Street, Lafayette, IN, 47904

Telephone number (optional): () -

have cast the enclosed provisional ballot at Precinct Name: _____

at the (select one) PRIMARY GENERAL MUNICIPAL SPECIAL ELECTION

to be held on:

05/03/2022
(Insert date (mm/dd/yy) of election.)

Signature of voter: Charlotte Rose Heibert Date signed (mm/dd/yy) 05/03/2022

COUNTY ELECTION BOARD FINDINGS

NOTE: Absentee voters voting by mail or traveling board do not complete PRO-2 because the application serves as the voter's response to the challenge.

The enclosed provisional ballot is determined to be:

Valid

Invalid due to the following reason: Voter failed to produce a valid form of voter ID, under IC 3-5-2-40.5, at the time of both casting a vote on election day and the time necessary for the completion of this provisional ballot.

If invalid, this envelope may not be opened, and this ballot may not be counted.

Dated (mm/dd/yy): 5/13/22

Tippecanoe County Election Board

TO THE PROVISIONAL BALLOT COUNTERS: After the ballot has been found valid by the county election board, open this envelope carefully. Do not deface or destroy the affidavit or the envelope. Take out the ballot enclosed for processing. If the ballot does not contain the initials of the poll clerks, the ballot shall, without being unfolded to disclose how the ballot is marked, be endorsed with the word "Rejected" and enclosed in State Form PRO-7 envelope.

EXHIBIT G

CODE_NAME	CODE_NAME	MAIL_IN	REGISTRATION_DATE	PROCESSED_DATE	LAST_NAME	FIRST_NAME	MIDDLE_NAME
Cancelled	Mail	1	3/17/2022	3/17/2022	Aven Aven Aven	Alexia Alexia Alexia	
Active	Mail	1	3/22/2022	3/22/2022	Vinarcik	Amelia	H
Active	Mail	1	3/18/2022	3/18/2022	McBride	Ava	Francesca
Active	Mail	1	3/7/2022	3/17/2022	Brown	Katelynn	Grace
Active	Mail	1	3/21/2022	3/21/2022	Pierce	Owen	Michael
Active	Mail	1	3/21/2022	3/21/2022	Tetzloff	Cole	S
Active	Mail	1	3/17/2022	3/17/2022	Brody	Myranda	Leigh
Active	Mail	1	3/7/2022	3/17/2022	Wilkinson	Alexus	Renee
Active	BMV	1	3/7/2022	6/5/2022	Vazquez	Ghermayoni	
Active	Mail	1	3/17/2022	3/17/2022	Barnes	Jada	Monay
Active	Mail	1	3/4/2022	3/17/2022	Wending	Jenna	L
Active	BMV	1	3/17/2022	6/2/2022	Valiant	Paul	Andrew
Active	Mail	1	3/18/2022	3/18/2022	Sandifur	Josephine	Marie
Active	Mail	1	3/7/2022	3/7/2022	Hensley	Reed	Lynn

Active	BMV	1	3/17/2022	6/16/2022 Taylor	Bryson	John
Active	Mail	1	3/18/2022	3/18/2022 Jagan	Vinay	
Active	Mail	1	3/7/2022	3/17/2022 Colenburg	Shannon	Allen
Active	Mail	1	3/18/2022	3/18/2022 Ramos	Natalia	
Active	Mail	1	3/7/2022	3/17/2022 Cazares	Jesse	James
Active	Mail	1	3/7/2022	8/1/2022 Allen	Kelcy	S
Active	Mail	1	3/18/2022	3/18/2022 Miller	Griffin	
Active	Mail	1	3/7/2022	3/17/2022 Delgado	Ethan	Edwards
Active	Mail	1	3/7/2022	3/7/2022 Herrera Ledezma	Anthony	
Active	Mail	1	3/17/2022	3/17/2022 Tapia	Natalia	
Active	Mail	1	1/6/2022	3/17/2022 Gaffney	Elias	B
Active	Mail	1	3/18/2022	3/18/2022 Johnson	Lanna	
Active	Mail	1	3/7/2022	3/17/2022 Barrett	Seionna	Nicole

Active	BMV	1	3/17/2022	6/23/2022 Stutzman	Preston	Dominick
Active	Mail	1	3/7/2022	3/17/2022 Grigsby	Jorlah	Lynne
Active	Mail	1	3/21/2022	3/21/2022 Jackson	Hallie	Dilyn
Active	Mail	1	3/7/2022	3/17/2022 Swisher	Cameron	M
Active	Mail	1	3/17/2022	3/17/2022 Rubio	Atina	Prudenciana
Active	Mail	1	3/18/2022	3/18/2022 Murry	Joshua	R
Active	Mail	1	3/21/2022	3/21/2022 Corwin	Kyla	Nicole
Active	Mail	1	3/18/2022	3/18/2022 Ramirez	Grace	Carmen
Active	Mail	1	3/17/2022	3/17/2022 Ray	Lynn	Patrick
Active	Mail	1	2/24/2022	3/17/2022 Holmes	Ryan	T
Active	Mail	1	3/7/2022	3/17/2022 Prickett	Madison	E
Active	Mail	1	3/18/2022	3/18/2022 Meza	Evelyn	
Active	Mail	1	3/4/2022	3/17/2022 Nelson	Isaac	Malachi
Active	Mail	1	3/17/2022	3/17/2022 Roper	Keazja	D E

Active	Mail	1	3/18/2022	3/18/2022 Taylor	Jacob	Logan
Active	Mail	1	3/18/2022	3/18/2022 Chianis	Ella	Rose
Active	Mail	1	3/18/2022	3/18/2022 Tague	Kiersten	M
Active	Mail	1	3/17/2022	3/17/2022 Wagner	Shaun	Ian
Active	Mail	1	3/10/2022	3/17/2022 Rudolphi	Christopher	Joseph
Active	Mail	1	3/7/2022	3/17/2022 Gallegos	Arianna	Collette
Active	Mail	1	2/28/2022	3/17/2022 Acuna	Gisselle	H
Active	Mail	1	3/7/2022	3/9/2022 Anderson	Kaige	Michael
Active	Mail	1	3/17/2022	3/17/2022 Baker	Kaylen	
Active	Mail	1	3/7/2022	3/9/2022 Bush	Isabel	Grace
Active	Mail	1	3/4/2022	3/17/2022 Cadwallader	Noah	Lewayne
Active	Mail	1	3/4/2022	6/7/2022 Calhoon	Mackenzie	Paige
Active	Mail	1	3/21/2022	3/21/2022 Chubb	Emily	Elizabeth
Active	Mail	1	3/18/2022	3/18/2022 Corwin	James	Michael
Active	Mail	1	3/18/2022	3/18/2022 Durnil	Nicholas	Tyler

Active	Mail	1	3/18/2022	3/18/2022 Eads	Mackenzie	Marie
Active	Mail	1	3/7/2022	3/17/2022 Escobedo	Michael	
Active	Mail	1	3/7/2022	3/17/2022 Gaeta	Yoselin	Glarirido
Active	Mail	1	3/21/2022	3/21/2022 Gilman	Aiden	L
Active	Mail	1	3/7/2022	3/17/2022 Griffith	Jana	Lanell
Active	Mail	1	3/21/2022	3/21/2022 Hamby	Isaak	John
Active	Mail	1	3/21/2022	3/21/2022 Hameed	Eshan	
Active	Mail	1	3/21/2022	3/21/2022 Harford	Abigail	Hope
Active	Mail	1	3/18/2022	3/18/2022 Hedrick	Joshua	Carl
Active	Mail	1	3/7/2022	3/17/2022 Hernandez	Ricardo	Anthony
Active	Mail	1	3/4/2022	6/7/2022 Hill	Isaiah	Jamari
Active	BMV	1	3/18/2022	5/27/2022 Jacome	Denise	
Rejected	Mail	1	3/7/2022	3/21/2022 Janvier	Annabella	
Active	Mail	1	3/18/2022	3/18/2022 Johnson	Chase	Y
Active	Mail	1	3/7/2022	3/17/2022 Karger	Aldrein	S

Active	Mail	1	3/4/2022	3/17/2022	Kochell	Ashton	William
Active	BMV	1	3/18/2022	3/18/2022	Mabborang	Reymarie	Bautista
Active	Mail	1	3/17/2022	3/17/2022	Manning	Kelsey	Elaine
Active	Mail	1	3/18/2022	3/18/2022	Marillo	Erick	
Active	Mail	1	3/21/2022	3/21/2022	Million	Emily	Grace
Active	Mail	1	3/18/2022	3/18/2022	Minich	Simon	Alastair
Active	Mail	1	3/7/2022	3/17/2022	Olvera	Alexandro	
Active	Mail	1	3/4/2022	3/17/2022	Orellana	Adrian	Adan
Active	Mail	1	3/21/2022	3/21/2022	Owen	Wyatt	D
Active	Mail	1	3/7/2022	3/17/2022	Piris	Anthony	Jesus
Active	Mail	1	3/7/2022	3/17/2022	Pulley	Brandi	JoAnn
Active	Mail	1	3/18/2022	3/18/2022	Ramirez	Sabine	Ruby
Active	Mail	1	3/7/2022	3/17/2022	Ray	Daniel	James
Active	Mail	1	3/7/2022	3/17/2022	Reese	Eddie	
Active	Mail	1	3/18/2022	3/18/2022	Robertson	Faith	Marie

Active	Mail	1	3/4/2022	3/17/2022 Robinson	Danyla	Ericka
Active	Mail	1	3/17/2022	3/17/2022 Rubsam	Ash	D B
Active	Mail	1	3/17/2022	3/17/2022 Sanders	Makiah	Jinea
Active	Mail	1	3/7/2022	3/22/2022 Santos Gonzalez	Cyndia	Marie
Active	Mail	1	3/17/2022	3/17/2022 Schuler	Samuel	
Active	Mail	1	3/18/2022	3/18/2022 Shaw	J'oshua	
Active	Mail	1	3/4/2022	3/17/2022 Sims	Trevon	Pierre
Active	Mail	1	3/21/2022	3/21/2022 Slade	Makayla	Elizabeth
Active	Mail	1	3/7/2022	3/7/2022 Smith	Aaliyah	Jordan
Active	Mail	1	3/17/2022	3/17/2022 Smith	Shavonna	Pierra Auri
Active	Mail	1	3/7/2022	3/9/2022 Soto	Viviana	
Active	Mail	1	3/4/2022	3/17/2022 Velasco	Martrell	Deshawn
Active	BMV	1	3/17/2022	9/14/2022 Viveros	Jazdy	Teresa
Active	Mail	1	3/18/2022	3/18/2022 Wells	Alexander	

Active	Mail	1	3/22/2022	3/22/2022 Woker	Wyatt	
Active	Mail	1	3/11/2022	3/17/2022 Wood	Micah	Randall
Active	BMV	1	3/17/2022	8/11/2022 Zschiedrich	Eric	Joseph

RETRIEVED FROM DEMOCRACYDOCKET.COM

DOB	1: Form Type	1: Received Method	1: Date Received	1: Verify ID Flag	Created by	Changed by
1/18/2003	Fed	Mail	10/15/2021	Yes	Gharris	
	Fed	Mail	3/17/2022	No	GHarris	
	BMV		8/2/2022			
8/17/2003	Fed	Mail	3/22/2022		Jramirez	
2/25/2004	Fed	Mail	3/18/2022		Gharris	Jroush
12/16/2003	Fed	Mail	7/10/2021		Jramirez	Msmith
2/19/2003	Fed	Mail	3/21/2022		gharris	
2/15/2003	Fed	Mail	3/21/2022			
10/18/2003	Fed	Mail	12/6/2021		gharris	
	Fed	Mail	3/17/2022		gharris	
5/24/2004	fed	mail	7/10/2021		jramirez	
7/2/2004	fed bmv	mail	3/7/2022		jramirez	
			6/3/2022			
9/5/2003	fed	mail	3/4/2022		jramirez	
10/18/2003						
6/7/1983	fed	mail	10/12/2021		gharris	
	fed	mail	3/17/2022		jramirez	
	bmv		6/1/2022		jramirez	
11/7/2003	fed	mail	3/18/2022		gharris	
9/16/2003	fed	mail	3/7/2022		jramirez	

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4/13/2004	fed	mail	12/3/2021	gharris
	fed	mail	3/17/2022	jramirez
	bmv		6/14/2022	jramirez
5/5/2003	fed	walk-in	10/6/2021	gharris
	fed	mail	3/18/2022	jramirez
3/16/2004	fed	mail	3/7/2022	jramirez
7/31/2003	fed	mail	9/28/2021	gharris
	fed	mail	3/18/2022	jramirez
9/12/2003	fed	mail	7/10/2021	jramirez
10/14/2003	fed	mail	3/4/2022	jramirez
2/4/2003	fed	mail	10/6/2021	gharris
	fed	mail	3/18/2022	jramirez
9/18/2003	fed	mail	6/4/2022	jramirez
12/31/2003	fed	mail	7/10/2021	jramirez
5/15/2003	fed	mail	10/6/2021	gharris
	fed	mail	3/17/2022	jramirez
6/28/1998	fed	mail	1/6/2022	gharris
8/27/2003	fed	walk-in	10/6/2021	gharris
	fed	mail	3/18/2022	jramirez
1/5/2004	fed	mail	3/7/2022	jramirez
	?	?	3/10/1910	jramirez

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4/24/2003	fed	mail	12/3/2021	jamirez
	fed	mail	3/17/2022	jamirez
	bmv		6/22/2022	jamirez
12/31/2003	fed	mal	3/7/2022	jamirez
7/15/2003	fed	mal	3/21/2022	gharris
8/26/2003	fed	mail	3/7/2022	jamirez
2/22/2004	fed	mail	12/6/2021	gharris
	fed	mail	3/17/2022	jamirez
3/3/2003	fed	mail	10/5/2021	gharris
	fed	mail	3/18/2022	jamirez
12/12/2003	fed	mail	3/21/2022	gharris
12/7/2003	fed	mail	12/3/2021	jamirez
	fed	mail	3/16/2022	jamirez
9/13/2002	fed	mail	11/29/2021	jamirez
	fed	mail	3/17/2022	jamirez
12/13/2002	fed	mail	2/23/2022	gharris
3/5/2004	fed	mail	7/10/2021	jamirez
11/2/2003	fed	mail	3/18/2022	gharris
8/22/2002	fed	mail	3/4/2022	jamirez
6/2/2004	fed	mail	7/10/2021	jamirez

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fed	mail	3/17/2022	jramierz
2/27/2003 fed	mail	3/18/2022	gharris
11/29/2002 fed	walk-in	10/6/2021	gharris
fed	mail	3/18/2022	jramirez
9/30/2004 fed	mail	3/18/2022	gharris
10/12/2003 fed	mail	12/6/2021	gharris
fed	mail	3/17/2022	jramirez
1/15/1998 fed	mail	3/10/2022	gharris
1/26/2003 fed	mail	3/7/2022	jramirez
1/4/1980 fed	mail	2/28/2022	jramirez
8/27/2003 fed	mail	3/4/2022	jramirez
2/12/2003 fed	mail	10/21/2021	gharris
fed	mail	3/17/2022	gharris
12/12/2003 fed	mail	3/9/2022	jramirez
4/8/2004 fed	mail	3/4/2022	jramirez
9/6/2003 fed	mail	3/4/2022	jramirez
12/2/2002 fed	mail	3/21/2022	gharris
10/1/2003 fed	mail	8/12/2021	gharris
5/6/2004 fed	mail	3/18/2022	gharris

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6/3/2004 fed	mail	3/18/2022	gharris
1/21/2004 fed	mail	3/7/2022	jramirez
4/5/2004 fed	mail	7/10/2021	jramirez
7/22/2003 fed	mail	3/21/2022	gharris
2/23/2004 fed	mail	7/10/2021	jramirez
12/26/2003 fed	mail	3/21/2022	gharris
8/8/2004 fed	mail	3/21/2022	gharris
1/31/2004 fed	mail	3/21/2022	gharris
4/27/2004 fed	mail	3/18/2022	gharris
10/10/2003 fed	mail	3/7/2022	jramirez
9/18/2003 fed	mail	3/4/2022	jramirez
2/10/2004 fed	walk-in	12/3/2021	jramirez
fed	mail	3/16/2022	jramirez
bmv		5/26/2022	jramirez
9/27/1996 fed	mail	3/7/2022	jramirez
9/28/2003 fed	walk-in	10/6/2021	gharris
fed	mail	3/18/2022	jramirez
5/13/2004 fed	mail	7/10/2021	jramirez

RETRIEVED FROM DEMOCRACYDOCKET.COM

5/18/2004 fed	mail	3/4/2022	jramirez
3/15/1986 fed bmv	mail	12/6/2021	jramirez jramirez
7/2/2004 fed	mail	12/3/2021	gharris
full service agency	mail	3/16/2022	jramirez
8/14/2003 fed	mail	8/12/2021	gharris
12/2/2003 fed	mail	3/21/2022	gharris
3/1/2002 fed	mail	10/19/2021	gharris
fed	mail	3/18/2022	jramirez
10/13/2003 fed	mail	3/17/2022	jramirez
2/2/2004 fed	mail	3/4/2022	jramirez
2/11/2004 fed	mail	3/21/2022	gharris
10/6/2003 fed	mail	3/4/2022	jramirez
5/19/2004 fed	mail	3/17/2022	jramirez
2/21/2003 fed	mail	10/12/2021	gharris
fed	mail	3/18/2022	jramirez
3/30/2004 fed	mail	3/7/2022	jramirez
5/18/2004 fed	mail	3/7/2022	jramirez
3/28/2004 fed	mail	3/18/2022	gharris

RETRIEVED FROM DEMOCRACYDOCKET.COM

12/11/2003 fed	mail	3/4/2022	jramirez
?	?	3/4/2022	jramirez
9/14/2003 fed	mail	9/14/2021	jramirez
fed	mail	3/17/2022	jramirez
7/21/2003 fed	mail	12/6/2021	gharris
fed	mail	3/17/2022	jramirez
9/5/2003 fed	mail	3/4/2022	jramirez
7/17/2003 vrg-7	mail	10/6/2021	gharris
fed	mail	3/17/2022	jramirez
9/21/2003 fed	mail	3/18/2022	gharris
2/11/2003 fed	mail	3/4/2022	jramirez
6/3/2004 fed	mail	3/21/2022	gharris
3/31/2004 fed	mail	3/4/2022	jramirez
4/27/2004 fed	mail	12/3/2021	gharris
fed	mail	3/17/2022	jramirez
6/30/2004 fed	mail	7/10/2021	jramirez
8/19/2003 fed	mail	3/4/2022	jramirez
7/18/2004 fed	mail	12/3/2021	jramirez
fed	mail	3/17/2022	jramirez
bmv		9/13/2022	
1/21/2003 fed	walk-in	10/6/2021	gharris

RETRIEVED FROM DEMOCRACYDOCKET.COM

fed	mail	3/18/2022	jramirez
4/6/2003 fed	mail	3/22/2022	jramirez
3/25/2004 fed	mail	3/11/2022	jramirez
7/4/2004 fed	walk-in	12/29/2021	gharris
fed	mail	8/24/2021	jramirez
bmv		8/10/2022	jramirez

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1: Notes

Incomplete

Verify ID Override on 3/17

Transfer to Porter County'

Verify ID override on 3/22/22; Scan document of fed form shows signed date of 9/28/21

Verify ID override on 3/18/22 by Gharris

Verify ID override on 3/17/22 by Jramirez; document scan shows date signed 3/4/22 - why 7/10/21 as date received?

Verify ID override on 3/21/22 by Gharris

verify ID override on 3/21/22 by gharris

cancelled on 3/16/22; only one doc scanned with a signed date of 11/23/21 and scan date of 12/7/21

verify ID Override on 3/17/22

form scan date on 3/4/22 but date received as 7/10/21 and voter signed on 3/4/22?; appears was made incomplete?; verify ID override on 3/17/22 by jra

verify ID flag removed on 3/17/22 by jramirez

BMV registration cancelled previous address

verify ID flag removed on 3/17/22 by jramirez

form signed on 9/28 and scanned on 10/19/21; cancelled with 3/17/22 entry

verify flag removed on 3/17/22 by jramirez

verify ID flag removed on 3/18/22

verify ID flag removed on 3/7/22 by jramirez

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doc signed on 11/23/21; scanned on 12/7/21; made incomplete; cancelled by 3/17 entry
verify ID flag removed on 3/17/22

walk-in is delivery method but says received by mail and requires ID for residency?; also made incomplete by gharris
verify ID flag removed on 3/18/22 by jramirez

made incomplete by jramirez on 3/7; verify ID flag removed on 3/17

made incomplete by gharris on 9/29/21
verify ID flag removed by jramirez

made incomplete on 3/7/22; verify ID flag removed by jramirez on 3/17/22 - received date shows 7/10/21 but voter signed on 3/4/22?

verify ID flag removed on 8/1/22 by jroush; made incomplete on 3/7/22 & 3/17/22 & 6/7/22 by jramirez; appears to have been moved to pending on 6/7,

DLN/SSN not issued; approved by jramirez - ?; made incomplete on 10/6/21 by jramirez; rejected on 3/16/22 by jramirez
verify ID flag removed on 3/18/22

verify ID flag removed on 3/17/22 by jramirez

verify ID flag removed on 3/7/22 by jramirez; voter signed form on 3/4/22 but registration date is July 2021?

made incomplete by gharris; rejected by gharris on 3/16 for missing DLN/SSN (though her document shows last 4 of SSN) cancelled and superseded by sec
verify ID flag removed by jramirez

was made incomplete by gharris; verify ID flag removed by jramirez on 3/17/22

marked as walk-in submission, but received by mail, which triggered the verify ID flag; originally marked incomplete by gharris;
verify ID flag removed on 3/18/22 by jramirez

marked incomplete on 3/7/22 by jramirez; verify ID flag removed by jramirez on 3/17/22 - not sure reason for 10/12/22 activity; only one registration in c
10/12/22 verify ID flag removed by jramirez

marked incomplete on 12/6/21 by jramirez; rejected on 3/16/22 by jramirez
verify ID flag removed on 3/17/22 by jramirez

verify ID flag removed on 3/17/22 by jramirez

verify ID flag removed on 3/21/22 by gharris

made incomplete on 3/7/22 by jramirez; verify ID flag removed on 3/17/22 by jramirez

made incomplete on 12/6/21 by gharris; rejected by jramirez on 3/16/22
verify ID flag removed on 3/17/22 by jramirez

made incomplete on 10/5/21 by gharris; rejected on 3/16/22 by jramirez
verify ID flag removed on 3/18/22 by jramirez

verify ID flag removed on 3/21/22 by gharris

made incomplete by jramirez on 12/6/21; rejected on 3/16/22
verify ID flag removed on 3/18/22

made incomplete on 11/29/21; rejected on 3/16/22 by jramirez
verify ID flag removed on 3/17/22 by jramirez

made incomplete on 2/24/22; verify ID flag removed on 3/17/22 by jramierz

made incomplete on 3/7/22 by jramierz; verify ID flag removed on 3/17/22 - not sure why registration data is for July 2021 when only doc is signed on 3/4

verify ID flag removed on 3/18/22 by gharris

made incomplete on 3/4/22 by jramirez; verify ID removed on 3/17/22 by jramirez

made incomplete on 3/7/22 by jramirez; rejected on 3/16/22 - not sure why received date is 7/10/21 on the record? Voter signed doc on 3/4/22 accordin

verify ID flag removed on 3/17/22

verify ID flag removed on 3/18/22 by gharris

notes received by mail but delivery method is walk-in; required ID for this record; made incomplete - no scanned doc on SVRS record; rejected on 3/17/22
verify ID flag removed on 3/18/22 by jramirez

verify ID flag removed on 3/18/22

incomplete on 12/6/21 by gharris; rejected on 3/16/22 by jramire
verify ID flag removed on 3/17/22 by jramirez

made incomplete on 3/10/22 by gharris; verify ID flag removed on 3/17/22 by jramirez

incomplete on 3/7/22; verify ID flag removed by jramirez on 3/17/22

made incomplete on 2/28/22 by gharris; verify ID removed on 3/17/22 by gharris

made incomplete on 3/7/22 by jramirez; verify ID removed on 3/9/22 by jramirez

made incomplete on 10/21/21 by gharris; rejected on 3/16/22 by gharris
verify ID flag removed on 3/17/22

made incomplete on 3/7/22; moved to pending on 3/9; verify ID flag removed on 3/9/22

made incomplete on 3/4/22 by jramirez; verify ID flag removed on 3/17/22 by jramirez

made incomplete on 3/4/22 by jramirez; moved to pending on 6/7/22 by jramirez; verify ID removed on 6/7/22 by jramirez - incomplete notes the app is

verify ID flag removed on 3/21/22 by gharris

verify ID flag removed on 3/18/22 by gharris - not sure why 8/12/21 received date in system when form signed by voter on 3/17/22

verify ID flag removed on 3/18/22 by gharris

verify ID flag removed on 3/18/22 by gharris

made incomplete on 3/7/22 by jramirez; verify ID flag removed on 3/17/22 by jramirez

incomplete on 3/7/22 by jramirez; verify ID flag removed on 3/17 by jramirez

verify ID flag removed on 3/21/22

made incomplete on 3/7/22; verify ID flag removed on 3/17/22 by jramirez - not sure why the 7/10/21 date for received when voter signed doc on 3/4/21

verify ID flag removed on 3/21/22 by gharris

verify ID flag removed on 3/21/22 by gharris

verify ID flag removed on 3/21/22 by gharris

verify ID flag removed on 3/18/22 by gharris

made incomplete on 3/7/22 by jramirez; verify ID flag removed on 3/17/22 by jramirez

made incomplete on 3/4/22 by jramirez; verify ID flag removed on 6/7/22 by jramirez

marked incomplete on 12/6/21; notes walk-in as submission method but then says received as mail; rejected on 3/16/22

verify ID flag removed on 3/18/22 ;cancelled on 6/9/22 due to bmv registration

3/16/22 note that DLN/SSN not issued on the record; VR form is missing the DLN/SSN - not sure why proof of residency document was sent to the voter r:

noted as walk-in submission, but received by mail?; made incomplete by gharris; cancelled on 3/16/22 when new entry made below

verify ID flag removed on 3/18/22 by jramirez

made incomplete on 3/7/22 by jramirez; verify ID flag removed on 3/17/22 by jramirez - not sure why the received by date is in July when voter signed do

made incomplete on 3/4/22; verify ID removed on 3/17/22 by jramirez

made incomplete on 12/16/21 by jramirez; cancelled on 3/16/22 due to next entry - verify ID was on record until next record entered, though not sure how not sure why received by is noted as mail with a bmv record? But there are not BMV docs in SVRS on the voter's record

made incomplete on 12/3/21 by gharris; cancelled with next entry

verify ID removed on 3/17/22 by jramirez - not sure why the VRG-6 form is used as the forms type; it's not included in voter's document. Only the federal

verify ID removed on 3/18/22 by gharris; not sure why received date is 8/12/21 when form was signed by voter on 3/17/22

verify ID removed on 3/21/22

made incomplete by gharris on 10/19/21; rejected on 3/25/22 for next entry

verify ID removed by jramirez on 3/18/22

made incomplete on 3/7/22; verify ID removed by jramirez on 3/17/22

made incomplete on 3/4/22 by jramirez; verify ID removed on 3/17/22 by jramirez

verify ID removed on 3/21/22 by gharris

made incomplete on 3/7/22; verify ID removed on 3/17/22 by jramirez

made incomplete on 3/16/22; verify ID removed on 3/17/22 by jramirez

made incomplete on 10/12/21 by gharris; rejected on 3/16/22 by jramirez for next entry

verify ID flag removed on 3/18/22

made incomplete on 3/7/22; verify ID flag removed on 3/17/22

made incomplete on 3/7/22 by jramirez; verify ID removed on 3/17/22 by jramirez

verify ID removed on 3/18/22 by gharris

made incomplete by jramirez on 3/16/22; verify ID removed on 3/17/22 by jramirez
no NVRA type but 10/12/22 verify ID flag removed - ? Voter signed fed form on 3/3/22

made incomplete on 12/8/21 by jramirez; rejected on 3/16/22 from next entry
verify ID flag removed on 3/17/22 (also not a federal form; state VRG_7)

made incomplete on 12/6/21 by gharris; rejected by jramirez on 3/16/22 with next entry
verify ID flag removed on 3/17/22 by jramirez

made incomplete on 3/7/22; verify ID flag removed on 3/22/22 by jramirez

made incomplete on 10/6/21 by gharris; rejected on 3/16/22 by jramirez with next entry - scanned form is the fed form, however
verify ID removed on 3/17/22 by jramirez

verify ID removed on 3/18/22 by gharris

made incomplete on 3/4/22 by jramirez; verify ID removed on 3/17/22 by jramirez

verify ID removed on 3/21/22 by gharris

verify ID removed on 3/7/22 by jramirez

made incomplete on 12/3/21 by gharris; rejected with next entry
verify ID removed on 3/17/22 by jramirez

verify ID removed on 3/9/22; note voter signed form on 3/4/22 so not sure why 7/10/21 receipt date...

verify ID removed on 3/17/22 by jramirez; made incomplete on 3/4/22 by jramirez

made incomplete on 12/3/21 by jramirez; rejected on 3/16/22 by next entry
verify ID flag removed on 3/17/22 by jramirez
BMV registration - not sure why it says received by mail....

says received by mail but submission method is walk-in; made incomplete on 10/6/21 by gharris; rejected by jramirez on 3/16/22 for next entry

verify ID flag removed on 3/18/22 by jramirez

verify ID flag removed on 3/22/22 by jramirez;

verify ID flag removed on 3/17/22 by jramirez; made incomplete on 3/11/22

submission method walk-in but received by mail indicated; made incomplete on 12/29/21 by gharris but rejected on 3/16/22 by jramirez for next entry

verify ID flag removed on 3/17/22 by jramirez; not sure why the received date is 8/24/21 when voter signed on 12/5/21

bmv app

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missing DLN/SSN, but voter's scanned document shows 4-digit SSN?

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ather than treating as an incomplete? Verify ID remains on record

EXHIBIT H

According to Civix query, Preston Stutzman had a verify ID flag associated with his record. Civix confirmed that the verify ID flag is added to a first time voter's record when the submission type of "mail" is selected for the registration form.

Based on the documents provided by Tippecanoe County, the scanned VR document has the "hallmark" of the LWV federal form where it prompts the voter to enter DLN or SSN in the ID number box. The county should confirm whether this form was hand-delivered or mailed, based on their recollection.

The VR form was signed by the voter on 12/2/21 and appears to have been entered into SVRS and marked incomplete by Juan Ramirez on or around 12/6/21. According to the status history for the 12/6/21 entry, the registration was rejected on 3/16/22 by Juan Ramirez.

The registration details for the 12/6/21 submission notes that the voter is to "Personal ID Required" (marked Yes) for HAVA purposes and it has not yet been provided (marked No).

The second notation in the registration history appears to be an override of the 'verify ID' flag, which a county user would likely need to cancel the original registration and resubmit. See the registration details for the 3/17 entry where the override notes the verify ID flag was removed.

The voter then registered to vote at the BMV in June 2022 for his current registration.

There is no vote history associated with this record.

The county would need to confirm whether the registration was mailed or hand-delivered or if this was marked as "mailed" delivery due to their misapplication of the law. Additionally, the county would need to provide insight into their activities on or around March 17, 2022, regarding the proof of residency change – did the voter provide the documents or did the county manually override and adjust to correct their error?

Registration History for Preston Stutzman

The screenshot displays the Indiana Statewide Voter Registration System interface. At the top, there is a navigation bar with links for Home, Voter Search, Voter Overview, Application, Absentee, Hopper, and Reports. The current page is titled "Voter Overview" and shows the following details for Preston Stutzman:

- Name: STUTZMAN, PRESTON D
- Voter ID: 9370582337
- Date of Birth: 04/24/2003
- Status: ACTIVE
- County: TIPPECANOE
- Precinct: PERRY 04
- Split: 1
- Address: 6411 Oriole Dr, Lafayette IN 47905-8723
- Verified: (indicated by a green checkmark)

Below the voter details is a "Registration History" table with the following columns: Last Name, First Name, Residence Address, City, Status, ID, County, Start Date, End Date, Created By, and Changed By.

Last Name	First Name	Residence Address	City	Status	ID	County	Start Date	End Date	Created By	Changed By
Stutzman	Preston D	6411 Oriole Dr	Lafayette	Active	937058233...	Tippecanoe	6/23/2022		jramirez2	AutoActivate_11...
Stutzman	Preston D	6411 Oriole Dr	Lafayette	Cancelled	042420032...	Tippecanoe	3/17/2022	6/30/2022	jramirez2	AutoActivate_11...
Stutzman	Preston D	6411 Oriole Dr	Lafayette	Cancelled	042420032...	Tippecanoe	3/16/2022	3/24/2022	jramirez2	AutoActivate_10...

Documents for Preston Stutzman

INDIANA STATEWIDE VOTER REGISTRATION SYSTEM

Home Voter Search Voter Overview Application Absentee Hopper Reports

www-20220322.001b | 10/4/2022

Voter Overview 🔍

Name: STUTZMAN, PRESTON D Status: **ACTIVE** Address: 6411 Oriole Dr **Verified**
 Voter ID: 9370582337 County: TIPPECANOE Lafayette IN 47905-8723
 Date of Birth: 04/24/2003 Precinct: PERRY 04
 Split: 1

Documents

Document Type	Description	Date	County
BMV	BMV	6/22/2022	Tippecanoe
VRG-7 Half Sheet	INDIANA VOTER REGISTRATION APPLICATION (HALF SHEET)	12/6/2021	Tippecanoe

Document for Preston Stutzman; VRG-7 Half Sheet scanned on 12/6/21

Document Detail

County: Tippecanoe
 Document Type: VRG-7 Half Sheet
 Description: VRG-7 Half Sheet
 Comment:
 Scan Date: 12/6/2021
 Signature Date:
 Image:

Voter Registration Application
 Before completing this form, review the General, Application, and State specific instructions.

Are you a citizen of the United States of America? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		This space for office use only.	
Will you be 18 years old on or before election day? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
<small>If you checked "No" in response to either of these questions, do not complete form. (Please see state-specific instructions for rules regarding eligibility to register prior to age 18.)</small>			
1	<input type="checkbox"/> Mr. <input type="checkbox"/> Miss <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. Last Name Stutzman	First Name Preston	Middle Name(s) Dominick <input type="checkbox"/> Jr <input type="checkbox"/> Sr <input type="checkbox"/> III <input type="checkbox"/> IV
2	Home Address 6411 Oriole Dr	Apt. or Lot #	City/Town Lafayette State IN Zip Code 47405
3	Address Where You Get Your Mail If Different From Above		City/Town State Zip Code
4	Date of Birth 4/24/03 Month Day Year	5 Telephone Number (optional) (765) 418-5716	6 ID Number - (See Item 6 in the Instructions for your state) Last four digits SSN or Indiana DL or ID Number 2504
7	Choice of Party (see Item 7 in the Instructions for your State)	8 Race or Ethnic Group (see Item 8 in the Instructions for your State)	
9 I have reviewed my state's instructions and I swear/affirm that: ■ I am a United States citizen ■ I meet the eligibility requirements of my state and subscribe to any oath required. ■ The information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false information, I may be fined, imprisoned, or (if not a U.S. citizen) deported from or refused entry to the United States.		Signature: <u>Preston Stutzman</u> Please sign full name (or put mark) ▲ Date: <u>12/2/21</u> Month Day Year	

If you are registering to vote for the first time: please refer to the application instructions for information on submitting copies of valid identification documents with this form.

Personal Information

NVRA Tracking ID: Federal
 Submission Method: Mail

Gender: U
 Name: Stutzman, Preston Dominick
 Date of Birth: 4/24/2003
 Voter ID Source: DOBSSN
 Voter ID: 042420032504
 SSN4: 2504
 Phone:
 Email:

Military: No
 Overseas: No
 Protected: No

Addresses

Residence Address: [6411 Oriole Dr](#) ✓verified
 Lafayette IN 47905-8723
 Tippecanoe
 Mailing Address: [6411 Oriole Dr](#) ✓verified
 Lafayette IN 47905-8723
 Previous Address: No Address Given

Registration Information

Date Received: 12/3/2021
 Received by Mail: Yes
 Missing Postmark: No
 Personal ID Required: Yes
 Personal ID Document: Not Yet Provided
 Copy on File: No
 US Citizen: Yes
 18 on Election Day: Yes
 Precinct Effective Date:
 Help Name:
 Help Address:
 Help City/Town:
 Help Phone:
 Signature Provided: Yes
 Temp Voter: No
 District Assignment Type: POINT ADDRESS
 Precinct Split: 1

Overrides

There are no overrides associated to this registration.

Status History for 12/6/21 Registration

You are viewing a registration different than the voter's current registration.
The selected registration has a status of CANCELLED.

Voter Overview

Name: STUTZMAN , PRESTON D
Voter ID: 9370582337
Date of Birth: 04/24/2003

Status: **ACTIVE**
County: TIPPECANOE
Precinct: PERRY 04
Split: 1

Address: 6411 Oriole Dr **verified**
Lafayette IN 47905-8723

Status History

Status	Voter ID	Effective Date	Expiration Date	Created By	Changed By
Rejected	042420032...	3/16/2022	3/24/2022	jramirez2	jramirez2
Incomplete	042420032...	12/6/2021	3/16/2022	jramirez2	jramirez2

Registration Details for 3/17/22 Entry (assuming Fed VR Form?)

Personal Information

NVRA Tracking ID: Federal
Submission Method: Mail

Gender: U
Name: Stutzman, Preston Dominick
Date of Birth: 4/24/2003
Voter ID Source: DOBSSN
Voter ID: 042420032504
SSN4: 2504
Phone: 765-418-5716
Email:

Military: No
Overseas: No
Protected: No

Addresses

Residence Address: 6411 Oriole Dr **verified**
Lafayette IN 47905-8723
Tippecanoe
Mailing Address: 6411 Oriole Dr **verified**
Lafayette IN 47905-8723
Previous Address: No Address Given

Registration Information

Date Received: 3/17/2022
Received by Mail: Yes
Missing Postmark: No
Personal ID Required: No
Personal ID Document: Not Yet Provided
Copy on File: No
US Citizen: Yes
18 on Election Day: Yes
Precinct Effective Date: 3/17/2022
Help Name:
Help Address:
Help City/Town:
Help Phone:
Signature Provided: Yes
Temp Voter: No
District Assignment Type: POINT ADDRESS
Precinct Split: 1

Overrides

Date	Type	Status	Reason	User
3/17/2022	Verify ID	Approved	Verify ID HAVA requirement met	jramirez2

Status History for 3/17/22 Registration

You are viewing a registration different than the voter's current registration.
The selected registration has a status of CANCELLED.

Voter Overview

Name: STUTZMAN , PRESTON D
Voter ID: 9370582337
Date of Birth:04/24/2003

Status: **ACTIVE**
County: TIPPECANOE
Precinct:PERRY 04
Split: 1

Address: 6411 Oriole Dr 
Lafayette IN 47905-8723

Status History

Status	Voter ID	Effective Date	Expiration Date	Created By	Changed By
Cancelled	042420032...	6/30/2022	6/30/2022	AutoActivate_109	AutoActivate_109
Active	042420032...	3/24/2022	6/30/2022	AutoActivate_101	AutoActivate_101
Pending	042420032...	3/17/2022	3/24/2022	jramirez2	AutoActivate_100

Status History for 6/22/22 BMV Registration

STATEWIDE VOTER REGISTRATION SYSTEM

Home Voter Search Voter Overview Application Absentee Hopper Reports www-20220322.001b | 10/4/2022

Voter Overview

Name: STUTZMAN , PRESTON D
Voter ID: 9370582337
Date of Birth:04/24/2003

Status: **ACTIVE**
County: TIPPECANOE
Precinct:PERRY 04
Split: 1

Address: 6411 Oriole Dr 
Lafayette IN 47905-8723

Status History

Status	Voter ID	Effective Date	Expiration Date	Created By	Changed By
Active	937058233...	6/30/2022		AutoActivate_112	AutoActivate_112
Pending	937058233...	6/23/2022	6/30/2022	jramirez2	AutoActivate_100
Incomplete	937058233...	6/23/2022	6/23/2022	jramirez2	jramirez2

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EXHIBIT I

From: [Kochevar, Matthew R](#)
To: [Doug Masson](#)
Cc: [Nussmeyer, Angela M](#)
Subject: RE: Follow Up on Jones Complaint
Date: Thursday, October 13, 2022 4:47:00 PM

Doug,

Except for one, of the records we did check in SVRS we did not see the Verify ID when we checked them. But we did see that the Verify ID flag had been applied when the application was entered into SVRS and then the flag was removed.

Matthew R. Kochevar
Co-General Counsel
Indiana Election Division
302 W. Washington St., Room E-204
Indianapolis, Indiana 46204

317-232-3942
mkochevar@iec.in.gov

If a person is unclear concerning election law provisions, the Election Division can serve as an interpretive source. However, where important legal rights are concerned, you must consult with your own attorney to be fully and properly advised.

From: Doug Masson <djm@hlblaw.com>
Sent: Thursday, October 13, 2022 8:57 AM
To: Kochevar, Matthew R <MKochevar@iec.IN.gov>
Subject: RE: Follow Up on Jones Complaint

****** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ******

Hi Matthew:

I'm trying to get the requested information from my clients. One of the initial responses I received when I forwarded this question indicates some confusion about what is being requested, so I will try to work through this with them.

As an initial matter, however, can you tell me whether you are seeing the Verify ID flag on these voters currently? If I am reading the spreadsheet you sent correctly, Anabella Janvier is the only one with that flag presently, and I assume that's related to her being the only one on the list coded as "rejected." I just want to make sure we don't have a bunch of people being asked for residency documents for current voting if that's not what the County folks are expecting.

Thanks for any information you can provide.

---Doug

From: Kochevar, Matthew R <MKochevar@iec.IN.gov>

Sent: Tuesday, October 11, 2022 5:23 PM

To: Doug Masson <djm@hlblaw.com>; Germany Harris <gharris@tippecanoe.in.gov>; Juan Ramirez <jramirez@tippecanoe.in.gov>

Cc: Nussmeyer, Angela M <ANussmeyer@iec.IN.gov>

Subject: Follow Up on Jones Complaint

Dear Mr. Masson,

The Indiana Election Division continues to investigate the HAVA complaint filed by Ken Jones and the League of Women Voters of Greater Lafayette against the Tippecanoe County Election Board. After reviewing the affidavits submitted by the members of the board as well as Democratic and Republican employee of the board, Germany Harris and Juan Ramirez, Co-Director Angie Nussmeyer has some additional questions for the board, Germany, and Juan.

Co-Director Nussmeyer has received a report of all the voter registration applications received by the board during the first quarter of 2022 that were marked as being received by mail (see attached). After reviewing the report and researching some of the individuals' SVRS records who are listed in the report, Co-Director Nussmeyer has found some voter registration applications that were marked in SVRS as being received by mail though there is no clear indication that the application was in fact received by mail, and that the Verify ID flag was added to the record indicating that the voter would need to present additional residency documentation. Some records were initially marked as incomplete though the scan of the application in the SVRS record appears to contain all the information necessary to process the application. A review of some of the records also show that in March 2022, the Verify ID flag was removed from those SVRS record, and in some cases the application as reprocessed. SVRS shows that both Germany and Juan removed those flags.

Co-Director Nussmeyer has the following questions:

1. Were the applications for the individuals in the excel list marked as being received by mail because they were in fact mailed to the county election board and not hand delivered to the office either by the applicant or a 3rd party?
2. Why were some of the applications marked as incomplete when it appears the application was completely filled out and signed by the applicant?
3. Many of the Verify ID flags appear to be manually removed by Germany or Juan for most in March 2022. What prompted the manual change to the records?

Understanding the county election board and their employees have many duties and responsibilities during this period of early voting and preparing for election day, we ask how long would the board need to respond to these questions?

Sincerely,

Matthew R. Kochevar
Co-General Counsel
Indiana Election Division

302 W. Washington St., Room E-204
Indianapolis, Indiana 46204

317-232-3942
mkochevar@iec.in.gov

If a person is unclear concerning election law provisions, the Election Division can serve as an interpretive source. However, where important legal rights are concerned, you must consult with your own attorney to be fully and properly advised.

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EXHIBIT K

2023 Indiana Voter Registration Guidebook Pages 17-20

HAVA Residency Documentation for Certain Voters

The section below applies to certain first time voters who submitted an application to register to vote by mail, and who are required by the federal Help America Vote Act to provide proof of *residency*. This section should not be conflated with Indiana's voter ID law, which requires specific types of identification to verify a person's *identity* to cast a ballot on Election Day or absentee in-person at the Clerk's office or other early voting location.

Proof of residency requirements do not apply to a person who 1) hand-delivers their state or federal "mail-in" voter registration application to the Indiana Election Division or county voter registration office, 2) registers to vote online at indianavoters.com, including using the ABS-VPD combined form for voters with print disabilities; 3) is an absent uniformed services or overseas voter, or 4) is entitled to vote absentee under federal law due to a determination by the Indiana Election Division that a permanent or temporarily accessible polling place cannot be provided for the individual or any other reason under federal law. (IC 3-7-33-4.5(b))

HAVA Residence Documentation: Voters Who Registered to Vote by Mail on or after January 1, 2003 and no later than December 31, 2005

As implemented by Indiana law, HAVA requires that an individual who, on or after January 1, 2003, and no later than December 31, 2005, submitted an application to register to vote by mail and who had not previously voted in a general election (or a special election for federal office) in the county as of the date the registration application is received, must provide additional residence documentation to the county voter registration office prior to voting.

The documentation required to provide proof of residency may be either: (1) a current and valid photo identification; or (2) a current utility bill, bank statement, government check, paycheck, or government document. Proof of residency documentation must show the name and residence address of the voter at the address shown on the voter's registration. Identification documents may be submitted in the mail with the registration application; in person or by mail at the county voter registration office at a later date; or at the polls on Election Day. (IC 3-7-22-5(5); IC 3-7-33-4.5)

Even among this group of first-time voters who register by mail, this HAVA additional documentation requirement does not apply to everyone. Specifically, this documentation requirement does not apply to:

- 1) an absent uniformed services voter;
- 2) an overseas voter; or
- 3) an individual entitled to vote absentee under federal law due to a determination by the Indiana Election Division that a permanent or temporarily accessible polling place cannot be provided for the individual, or for any other reason under federal law.

In addition to absent uniformed services voters or overseas voters whose exemptions are described above, this additional HAVA residence documentation requirement does not apply to an individual who submits a registration application that includes the individual's Indiana driver's license number or the last four digits of the individual's Social Security number if the county voter registration office matches this information in SVRS with an **existing** Indiana identification record bearing the same number, name, and date of birth set forth in the voter registration application.

HAVA Residence Documentation: Voters Who Registered to Vote by Mail on or after January 1, 2006

If an individual submits an application to register to vote by mail on or after January 1, 2006, and has not previously voted in a general election (or special election for federal office) anywhere within Indiana, as of

the date this application is received, the individual must provide the HAVA additional documentation described above to the county voter registration office before voting.

In addition to absent uniformed services voters or overseas voters whose exemptions are described above, this additional HAVA documentation requirement does not apply to an individual who submits a registration application that includes the individual's Indiana driver's license number or the last four digits of the individual's Social Security number if the county voter registration office matches this information in SVRS with an existing Indiana identification record bearing the same number, name, and date of birth set forth in the voter registration application. (IC 3-7-33-4.5)

County Voter Registration Officials, additional resources are available:

- ***Standard Operating Procedure VRG 50.1 Processing First Time Voters in SVRS***

Additional Residence Documentation Requirements and Processing of Voter Registration Applications

If the county voter registration office determines that the applicant is required to submit additional residence documentation, but has not done so, the office shall process the voter registration application but make a notation in the statewide voter registration system that additional residence documentation is required for that voter. This notation within the system is currently "Verify ID."

Once the voter submits the residence documentation, the county voter registration office shall remove this notation on the voter's registration record and enter the following information about the documentation provided:

- 1) the date the documentation was provided;
- 2) whether the documentation was:
 - a. presented to a precinct election board by a voter voting in person at the polling place;
 - b. filed with the county voter registration office by the applicant as part of the original filing of the application to register to vote, or in a subsequent filing received by the county voter registration office; or
 - c. filed with the county voter registration office by the county election board after the person applied to cast an absentee ballot; and
- 3) a brief description of the type of documentation provided.

The SVRS provides each county voter registration office with a coding system for identifying the types of residence documentation. (IC 3-7-33-4.5; IC 3-7-27-20) This coding system is set forth below and is available in the current version of the *Election Day Handbook* produced by the Indiana Election Division:

Type of Documents	Document Code
Indiana Driver's License or Bureau of Motor Vehicles ID Card	DL
Current and Valid Photo ID	PH
Current Utility Bill	UB
Bank Statement	BK
Government Check.....	GV
Paycheck	PY
Other Government Document	GD

To reduce as many problems as possible at the polls, every effort should be made to obtain the residence documentation from voters required to give it prior to Election Day.

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Additional HAVA Residence Documentation and Absentee Voting

If a voter who is required to provide additional residence documentation prior to voting submits an absentee ballot application to vote absentee by mail, the county election board shall include a notice (ABS-12) in the absentee ballot envelope (inner envelope with the ballots ABS-6 mailed to the voter). The ABS-12 informs the voter that the voter must file the additional documentation with the county voter registration office not later than the close of polls on Election Day at 6:00 p.m. (prevailing local time), for the absentee ballot to be counted.

If the absentee voter is voting before an absentee voter board (either in the clerk's office, a satellite facility, or a traveling board), the absentee voter board, shall, upon accepting the completed absentee ballot from the voter, provide the voter with the ABS-12. If the voter **does** present the required residency documentation prior to voting absentee in person, the county voter registration office shall immediately remove the flag from voter's registration record in SVRS to reflect that the residency documentation requirement has been met. If the voter **does not** present the required residency document before receiving the absentee ballot, the county election board shall add a notation on the absentee ballot application indicating additional HAVA documentation is required. The text of the notation must substantially conform with the language set forth in (IC 3-11-10-28; IC 3-11.5-4-3.5(c))

When an absentee voter subject to the additional residency documentation requirement returns a voted absentee ballot by mail, the county election board shall contact the county voter registration office to determine if the additional identification documents have been filed with the county voter registration office by the voter. If the voter **has** filed the documents, the county election board shall add a notation to the voter's absentee ballot application indicating that the required documents have been filed and that the absentee ballot may be counted if the ballot otherwise complies with this article.

If the voter **has not** filed the documents with the county voter registration office, the county election board shall add a notation on the absentee ballot application substantially as follows: *"Inspector (or absentee ballot counters): As of (insert date the absentee ballot application was approved) this voter was required to provide additional identification documentation with the county voter registration office before this ballot may be counted. Check the poll list and county election board certification to see if the voter has filed this information. If not, process as a provisional ballot if the ballot otherwise complies with Indiana law."* (IC 3-11.5-4-12; IC 3-11.5-4-3.5(c))

If the absentee ballot was made provisional, then the voter's ballot will not be counted unless the voter provides the documents to the county voter registration office prior to the close of the polls on Election Day at 6:00 p.m. prevailing local time. (IC 3-7-33-4.5; 3-11.7-2-1(b); IC 3-11.7-5-2(c); IC 3-11.7-5-3)

Additional Residence Documentation and Voting on Election Day

The county voter registration office shall indicate on each precinct's poll list or electronic pollbook used on election day whether any voter on the list is required to provide additional residence documents before voting in person or by absentee ballot. (IC 3-7-29-1) The county voter registration office may continue to receive identification documentation after the preparation of the poll list or downloading of information into the electronic pollbook.

In addition, the county voter registration office shall visit the appropriate post office not later than noon (local prevailing time) on Election Day to accept delivery of mail containing identification documentation. (IC 3-11-10-11; IC 3-11.5-4-7)

All absentee ballots are counted at a central location in the county. When absentee ballot counters are preparing an absentee ballot to be counted, they must determine if the absentee voter is not required to file additional residence information with the county voter registration office under IC 3-7-33-4.5. If the absentee ballot counters find that the voter has not filed the additional information required to be filed with the county voter registration office under IC 3-7-33-4.5, the absentee ballot shall be processed as a provisional ballot under IC 3-11.7. (IC 3-11.5-4-12)

If a voter offers to vote at the polls on Election Day, and the poll list or electronic pollbook indicates that the voter is required to present this HAVA additional residence documentation prior to voting, the poll clerk shall advise the voter that the voter must present one of the documents identified above in section (a). If a voter presents the required document, the poll clerk shall add a notation to the poll list or in the electronic pollbook indicating the type of document presented by the voter, using the statewide system document coding method described above. (IC 3-11-8-10.3(b)(5); IC 3-11-8-25.2)

NOTE: These documents may be presented as electronic communications (for example, using a smartphone, tablet computer, or in printed form).

After an election, the county voter registration office shall unseal the precinct election material and record on the county voter registration record information on the poll list regarding residence documentation provided by voters at the polling place prior to voting. (IC 3-10-1-31.1) This will remove the flag indicating the need to supply additional documentation for future elections.

If a voter is required to provide HAVA additional residence documentation, but does not do so at the polling place, the precinct election officials shall allow the voter to vote a provisional ballot after the voter and the officials complete the forms required for casting provisional ballots. The voter's provisional ballot, whether cast at an Election Day voting location or sent as an absentee ballot, will not be counted unless the voter provides the residency documentation to the county voter registration office prior to the close of the polls on Election Day at 6:00 p.m. prevailing local time. (IC 3-7-33-4.5; IC 3-11.7-2-1(b); IC 3-11.7-5-2(c), IC 3-11.7-5-3)

County Voter Registration Officials, additional resources are available:

- ***Standard Operating Procedure VRG 50.1 Processing First Time Voters in SVRS***
- ***Standard Operating Procedure VRG 16.1 Absentee Log for information***
- ***Standard Operating Procedure VRG 36.1 Absentee Ballot Cancelled Due to Cancelled Registration***