

FILED

October 27, 2020

**OFFICE OF
APPELLATE COURTS**

**STATE OF MINNESOTA
IN SUPREME COURT**

**Republican Party of Minnesota, and
Cheryl Nyquist,**

Supreme Court No. _____

Petitioners,

v.

**Ginny Gelms, in her official capacity as
Hennepin County Elections Manager,
and Jeff Norabrook, City of
Minneapolis Administrator of Elections**

**DECLARATION OF WILLIAM
WILLINGHAM**

Respondents.

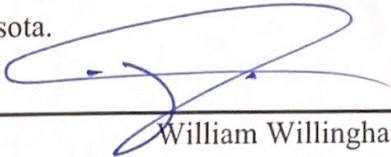
1. I, William Willingham, declare and state as follows:
2. I am an advisor for the Donald J. Trump for President Campaign in Minnesota.
3. Through this position I coordinate volunteers, including individuals witnessing the public counting of absentee ballots.
4. On October 22, 2020, I, along with a guest from the Republican National Committee, visited the Minneapolis Convention Center where absentee ballot counting was taking place.
5. I was told by a City Employee that the city would “end operations at noon and not start again until Monday morning.”
6. The City Employee elaborated that Minneapolis had been “too efficient” and too many ballots had been “processed.”

7. This meant that many ballots needed to be fed into the two scanning machines used by Minneapolis and that over the weekend a reduced staff would “feed the scanning machines.”
8. It was, and currently is, my understanding that the scanning machines referred to by the City Employee were and are machines used to tabulate absentee ballot votes.
9. Additionally, I was told that no ballot observers would be allowed in-person, for the activity described above, and viewing would only take place via the Youtube livestream of a single laptop covering the absentee ballot area.
10. After this discussion, I observed that the single laptop camera, described above, was facing away from the scanning machines, meaning that no livestream viewer would actually see the ballots being fed into the scanning machines.
11. I immediately contacted Jeff Norabrook, City of Minneapolis Administrator of Elections, and was put in touch with Grace Wachlarowicz, Assistant City Clerk, Elections & Voter Services.
12. Ms. Wachlarowicz informed me that the City was using the laptop to show the absentee ballot board and could not afford to secure a second laptop camera to show the ballots entering the scanning machines.
13. I indicated to City staff that without moving the laptop or utilizing a second laptop observers would not be able to see ballots being fed into the scanning machines and the livestream would be useless for the public.
14. I offered to provide the City with a laptop to address my concern.
15. My offer of a second laptop was rebuffed.

16. Upon information and belief, the count of absentee ballots occurred on Saturday October 24, 2020, and was not conducted in the public.

17. I am concerned that this will happen again if the Court does not clearly direct City and County officials to make the whole of absentee ballot counting public.

Executed on October, 26, 2020, at Eagan, Minnesota.


/s/ _____
William Willingham