

THE U.S. ALLIANCE FOR ELECTION EXCELLENCE

Newly revealed documents, acquired by the Honest Elections Project, shed light on the left's latest attempt to influence the election process.

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EXECUTIVE SUMMARY

"Zuck Bucks" 2.0

In April 2022, the left-wing <u>Center for Tech and Civic Life</u> and a coalition of likeminded nonprofits and companies formed a new \$80 million initiative called the <u>U.S. Alliance</u> <u>for Election Excellence</u>. The Alliance targets local election offices, offering participants an extensive portfolio of grants, trainings, resources, and consulting services. In November of 2022, it announced its first ten member offices—dubbed "Centers for Election Excellence"—that included two counties in North Carolina, Brunswick and Forsyth.

The Alliance claims to be nonpartisan and intended only to "bring together" elections officials "around a set of common values and standards." However, documents revealed by the Honest Elections Project (HEP)—and reviewed by the John Locke Foundation—show that the Alliance is actually designed to systematically influence every aspect of election administration in target offices and push progressive voting policies. In fact, the left-wing organization Democracy North Carolina praised Brunswick and Forsyth for joining, and linked it to their push for "progressive changes to election laws and procedures."

Documents obtained by HEP expose that the Alliance is merely a continuation of CTCL's scheme to use private funding to impact election policy nationwide. In 2020, CTCL was at

the heart of the liberal effort to use \$400 million provided by Mark Zuckerberg to influence the way election offices functioned and to steer funds disproportionately to jurisdictions that voted Democratic. Alliance members are also backed by a constellation of liberal dark money groups, including eBay chairman Pierre Omidyar's Democracy Fund and Arabella Advisors' New Venture Fund, and are led and staffed by people with deep ties to the Democratic Party and partisan progressive organizations.



A Scheme to Thwart Oversight and Accountability

Through public records requests, HEP acquired communications between Alliance partners and the initial cohort of local election offices—including those in Forsyth County (NC) and Brunswick County (NC). These documents have shed light on how the Alliance is structured and its growing influence over local election offices.

Membership and grant agreements uncovered by HEP reveal an unusual and complex structure that seems designed to thwart meaningful oversight and accountability. For instance, after the Alliance had recruited its first cohort of members it announced plans to begin charging offices to join. However, the Alliance also created "scholarships" to cover those membership costs, which are instantly converted into "credits" that member offices can use to buy services from CTCL and other Alliance partners. As a result, offices receive access to funds they can spend exclusively on services provided by left-wing companies and nonprofits, entirely outside normal public funding channels. Based on documentation obtained through the public records process, these services range from "legal" and "political" consulting to public relations and guidance on recruitment and training.

"I get something and give something."

Records also reveal the Alliance to be a two-way street. According to notes from one Brunswick official, "I get something and give something." In exchange for grants and services, offices are expected to provide CTCL and its partners substantial in-kind contributions, at taxpayer expense. Offices are expected to help the Alliance develop its programming and to turn over a vast array of information regarding their inner workings. Members are expected to work with the Alliance to develop and implement an "improvement plan" that reshapes the way each office functions. And grants issued by CTCL come with significant strings attached, despite <u>public claims</u> to the contrary.

Communications obtained through the public records process also show that the group is training officials to rebut public complaints about participation in the Alliance. Emails show Sara LaVere, Board of Elections director in Brunswick, dismissing concerns raised by a Republican member of the Brunswick County Board of Elections quoting the Alliance's own talking points. She even bragged about her extensive use of trainings, documents, and materials from CTCL and other Alliance members. She also revealed that The Elections Group – part of the Alliance – helped her write columns that she published in her own name during the election.

Banning Private Funding of Elections

As of December 2022, 24 states have enacted <u>bans</u> or restrictions on private funding of local election offices. These laws are widely considered essential safeguards against the corrupting influence of dark money-funded programs like the Alliance for Election Excellence. Unfortunately, some states (<u>including</u> North Carolina)



have had private funding limits vetoed by Democratic governors, leaving their offices exposed to the influence of special interests and organizations like the Alliance for Election Excellence. Indeed, CTCL and its partners exclusively selected the first cohort of "Centers for Election Excellence" from states without private funding limits.

Banning private election funding is a necessary step to thwart the influence of private election funding, but it is not a silver bullet. Vigilant oversight by lawmakers, rigorous reporting requirements, and total transparency from election offices are also key to maintaining the integrity of elections. Indeed, documents obtained by HEP show deep preexisting relationships between Alliance partners and officials in both Forsyth and Brunswick counties. Tim Tsuji, Board of Elections director in Forsyth, serves on CTCL's advisory committee, while Sara LaVere's emails reveal she was already making use of materials and resources from CTCL's partners before being selected. Other records make it clear that the Alliance aims to grow in scale and scope, emphasizing the importance of constant vigilance.

TOP TAKEAWAYS

The Left's New Election Scheme

- A group of left-wing organizations led by the <u>Center for</u>
 <u>Tech and Civic Life</u> (CTCL) have formed a new \$80 million
 initiative called the U.S. Alliance for Election Excellence
 to target and systematically push liberal voting policies
 into local election offices.
 - CTCL was at the center of Mark Zuckerberg's \$400
 million attempt to influence the 2020 election.



- The Alliance just announced its first ten "Centers for Election Excellence," including the election offices in two counties in North Carolina: Brunswick and Forsyth.
- Through public records requests, the Honest Elections Project (HEP) has obtained—and the John Locke Foundation has reviewed—communications between the
 <u>U.S. Alliance for Election Excellence</u> and election officials in Forsyth and
 Brunswick counties.
 - These documents reveal that the Alliance is charging offices to join, then waiving the cost by offering a "scholarship" that is converted into "credits" that can be spent to purchase services from CTCL and its partners.
 - Election offices are expected to provide substantial in-kind contributions to the Alliance, at taxpayer expense, that include helping the Alliance develop its programming.
 - The Alliance offers services that touch every aspect of election administration, ranging from "legal" and "political" consultation, to public relations, guidance, and assistance with recruitment and training.
 - The Alliance is gathering detailed information on the inner workings of participating election offices and developing "improvement plans" to reshape the way they operate.
- The Alliance clearly builds on recent efforts by the left to influence election operations in local offices through private funding from liberal dark money groups.

The Influence Of "Zuck Bucks"

- The Alliance is the latest iteration of the \$400 million attempt by Mark Zuckerberg and Priscilla Chan to fund local election operations.
 - 24 states have now passed <u>bans</u> or restrictions on "Zuck Bucks," while efforts in five other states – including <u>North Carolina</u> – were vetoed by Democratic governors
 - No jurisdictions were selected to join the program from states with a "Zuck Buck" ban or restriction in place.

stopping the private funding of election operations.

- in place.North Carolina Gov. Roy Cooper <u>vetoed</u> legislation in December 2021 aimed at
- A grant agreement also obtained through public records requests shows that CTCL's grants can total in the millions of dollars and include detailed specifications on how they can be spent, despite <u>public claims</u> that there are "almost no restrictions."





Allegations Of Bias

- Records acquired by HEP show that officials at the Brunswick County Board of Elections are being trained to reject complaints made by the public and by Republican officials
- When a Republican member of the local board of elections voiced concerns about CTCL's influence, Sara LaVere, Board of Elections director in Brunswick, issued a fervent defense of the group, discussing her extensive use of trainings, documents, and materials from CTCL.
 - o LaVere's response relied on the Alliance's own talking points.
 - LaVere admitted that The Elections Group part of the Alliance helped her write columns that she published in her own name during the election.

ADDITIONAL BACKGROUND INFORMATION

OVERVIEW AND MISSION

- The <u>U.S. Alliance for Election Excellence</u> is a collaboration of several elections-focused nonprofits and companies committed to "bringing together" election officials nationwide "around a set of common values and standards, support [for] each other, and [an effort to] keep their skills fresh."
- Documents revealed by the Honest Elections Project (HEP) show that the Alliance has developed a program to shape and influence every aspect of election policy and administration within an office chosen as a "Center for Election Excellence."
 - Email records show that the Center for Tech and Civic Life (CTCL) and other Alliance partners are gathering extensive data on the internal operations of offices selected as Alliance members and are drafting "improvement plans" for participating offices.
- The Alliance was <u>announced</u> during an early 2022 TED conference by CTCL executive director Tiana Epps-Johnson.
- The Alliance aims to create and disseminate a defined set of 'best practices' for election officials nationwide. The Alliance refers to this project as the "Values and Standards for Election Excellence" or "the Standards."

A core purpose of the Alliance is to promote the exchange of information about best practices in all directions: from the Alliance partners to centers, between centers, and from centers to the Alliance. One outcome of this exchange of information will be the creation of Values and Standards of Election Excellence ("the Standards"), which reflect nonpartisan excellence in election administration of local election departments across the country. Centers agree to contribute to the creation of the Standards by.

(Source: "Membership Agreement," U.S. Alliance For Election Excellence)

 The Alliance also aims to expand. Another initiative of the organization is to develop a nationwide certification program that will allow local election offices to be accredited as "Centers for Excellence."

Alliance Goals and Purpose: The Alliance is here to learn from election officials, inspire them to excellence, and celebrate their success. To accomplish these goals, the Alliance will develop and establish a nonpartisan, nationwide certification program so that jurisdictions meeting certain performances standards may hold themselves out as Centers for Excellence.

(Source: "Membership Agreement," U.S. Alliance For Election Excellence)

 The Alliance's inaugural 2023 cohort of Center(s) for Election Excellence were <u>chosen</u> in November 2022.

FUNDING

- Funding for the Alliance was initially <u>provided</u> by The Audacious Project. Housed within TED, The Audacious Project is a nonprofit committed to supporting "bold solutions to the world's <u>most</u> urgent challenges."
 - Over the past year, The Audacious Project has <u>provided</u> more than \$900 million towards its 2021-22 grantees.
 - Noted <u>funders</u> of The Audacious Project are the Skoll Foundation, Virgin Unite, The Valhalla Charitable Foundation, and ELMA Philanthropies.



 The Alliance has <u>committed</u> to spend \$80 million to bring together "election officials, designers, technologists, and other experts to envision, support, and celebrate excellence in U.S. election administration."

MEMBERSHIP TERMS

Membership Agreement

- According to a "Membership Agreement" acquired by HEP, the Alliance provides different services based on membership levels.
- Members taxpayer-funded election offices agree to pay dues ranging from \$1,600 to \$4,800 a year, though the membership agreement automatically enrolls applicants into a scholarship program (if allowed by law) that may cover those costs.
 - Scholarship funds are then converted behind the scenes into credits that member offices may spend on services provided by CTCL and its Alliance partners.

Membership Dues: In addition to the participation requirements detailed above, centers agree to pay yearly dues to the Alliance in the following amounts:
☐ Basic Membership: \$1,600/year ☐ Premium Membership: \$4,800/year

(Source: "Membership Agreement," U.S. Alliance For Election Excellence)

<u>Scholarships</u>: The Alliance has scholarship funds available to cover your membership dues in full, if doing so is permitted by law in your jurisdiction. By signing below, you agree to accept the Alliance's scholarship and certify that doing so complies with applicable legal requirements. The Alliance will not send you an invoice for membership dues.

(Source: "Membership Agreement," U.S. Alliance For Election Excellence)

 A basic membership includes access to election administration resources, trainings, coaching, and consulting.

Basic Membership:

- Curated access to a selection of off-the-shelf, publicly-accessible election administration resources, document templates, and training materials
- Center-specific coaching and consulting from select Alliance partners, in the form of a \$800 credit towards the fair market value of Alliance partners' hourly consulting services
- Access to numerous multi-center group coaching and consulting sessions hosted by select Alliance partners on an hourly basis
- Invitations to numerous live and recorded trainings and demos hosted by select Alliance partners, as well as
 facilitated discussions among centers concerning topics related to best practices in election administration

(Source: "Membership Agreement," U.S. Alliance For Election Excellence)

• Premium membership includes all of the basic membership benefits plus additional coaching and consulting services.

Premium Membership: Includes services included in Basic Membership, plus:

- Center-specific coaching and consulting from select Alliance partners, in the form of a \$3,040 credit towards the fair market value of Alliance partners' consulting services on an hourly basis
- Additional multi-center group coaching and consulting sessions hosted by select Alliance partners on an hourly basis
- Additional invitations to live and recorded trainings and demos hosted by Alliance partners, as well as additional facilitated discussions among centers

(Source: "Membership Agreement," U.S. Alliance For Election Excellence)

• In an email acquired from Forsyth County, an Alliance representative explained that the group decided on a membership structure so that "jurisdictions from across the country could participate," which was a "pivot" from their original vision to offer programming for free.

In addition to celebrating your work, compliance with federal, state, and local laws is a top priority for the Alliance. This means that we've been meeting with Alliance partners and our expert legal team to design a membership structure so jurisdictions from across the country can participate in the program. To be clear, this is a pivot from our original vision that would have offered Alliance programming for free, and it reflects our commitment to integrity and compliance.

(Source: Email Chain With Tim Tsuji, "Re: Next Steps With The Alliance: Membership Agreement," 11/22/22)

Members Provide Required Assistance to the Alliance

• The Membership Agreement details that local election offices must provide a significant amount of in-kind assistance to CTCL and its partners.

Centers agree to contribute to the creation of the Standards by:

- Attending and participating in events hosted by the Alliance for the purpose of defining and developing the Standards;
- Attending and participating in events hosted by the Alliance for the purpose of developing measurements, tools, trainings, and materials to help election jurisdictions achieve the Standards;
- Providing written and verbal feedback on documents, forms, templates, and trainings generated by the Alliance that are related to the Standards;
- Sharing local best practices and, where permissible, non-confidential forms, templates, and documents with the Alliance to be used as models for other election jurisdictions seeking to achieve the Standards;
- · Offering advice and support to Alliance partners and other centers;
- Sharing non-sensitive, non-confidential technical data and usage statistics and providing feedback about any Standards-related digital tools offfered by Alliance partners and implemented by the center

(Source: "Membership Agreement," U.S. Alliance For Election Excellence)

 Notes from an interview between an Alliance representative and a Brunswick County Board of Elections official note that the relationship is "a partnership. I get something and give something."

This is a partnership. I get something and give something.

2-year commitment

Start fall 2022, through 2024

(Source: "Notes From Interview 7/21/22," Brunswick County Board of Elections, 7/21/22)

Required "Improvement Plan"

- One requirement to become a Center for Election Excellence is developing an "improvement plan."
- According to notes from a Brunswick County, NC election official, the Alliance would "put together an improvement plan ... drafted by elections group," though its final implementation and approval would be left to local officials.

Schedule a site visit this fall. It's an assessment, take a snapshot of our operations. This is current state, what is future state. Put together an improvement plant. Drafted by elections group. I will have input and approval. Goal is 1stQ 2023.

(Source: "Notes From Interview 7/21/22," Brunswick County Board of Elections, 7/21/22)

SERVICES PROVIDED TO MEMBERS

- Coaching is provided by the Alliance's "elections group," who also offer "SOP" (standard operating procedures" and "can help" with "vote by mail, communications."
- Additionally, an interview between an Alliance representative and a Brunswick County election official details the different services provided by each partner:
 - Center for Civic Design = help/coaching.
 - U.S. Digital Response = off the shelf software, poll worker management systems, and custom software.
 - Stanford University = design, brainstorming, and etc.
 - o Center for Secure and Modern Elections = legal, policy, political assistance.
 - CTCL = funding.

Resources. Ready to provide access from best-in-class partners in the alliance. Providing SOP for elections department. Can help with vote by mail, communications. Center for civic design is on the ready to help/coach. Help with plain language, usability access. Technology partner US digital response USDR - provide off the shelf software. PW management system, can do custom software. Standford University Design Department - can help with design, brainstorming, etc. Center for Secure and Modern elections - legal, policy, political departments. Can help with deciphering how to implement law. Also, CTCL - have funding available to provide.

(Source: "Notes From Interview 7/21/22," Brunswick County Board of Elections, 7/21/22)

GRANT REQUIREMENTS

- A grant agreement obtained through the same public record request process shows that CTCL has stringent restrictions on how grant money issued by the Alliance to a jurisdiction can be spent.
 - Despite these restrictions, <u>public reporting</u> on CTCL's grants have claimed that they come with "almost no restrictions on how it can be spent."
 - The grant is only to be spent on physical and technological components needed for an election office, in addition to "personnel with specialized training ... whose absence could cause undesirable consequences or hamper the election security mission."



December 1, 2022

Kane County Clerk

I am pleased to inform you that based on and in reliance upon the information and materials provided by Kane County the Center for Tech and Civic Life ("CTCL"), a nonprofit organization tax-exempt under Internal Revenue Code ("IRC") section 501(c)(3), has decided to award a grant to support the work of Kane County ("Grantee").

The following is a description of the grant:

AMOUNT OF GRANT: \$2,000,000 USD

Amount	\$650,000	\$1,350,000
Disbursement date	December 2022	December 2023

PURPOSE: CTCL is dedicated to educating the public about government and democracy in the United States and to working with government agencies to develop the skills, strategies and tools to engage their citizens. CTCL has decided to make this grant to support activities that are consistent with these purposes. The grant funds must be used exclusively for the public purpose of planning and operationalizing safe and secure election administration infrastructure in Kane County ("Purpose").

(Source: "Grant Agreement – Kane County (IL)," U.S. Alliance For Election Excellence, 12/1/22) 3. The amount of the grant shall be expended on the following specific election infrastructure needs: 1) Key Physical Components: Equipment and materials, facilities, and records, including voting locations, technical facilities, storage facilities, processing facilities, administrative facilities, and voting hardware; 2) Key Technological Components: Hardware and software components critical to supporting the election security mission, including computers, servers, databases, and other IT systems and assets used in election administration activities; and 3) Key Human Components: Personnel with specialized training, certification, knowledge skills, authorities, or roles whose absence could cause undesirable consequences or hamper the election security mission, including strategic, operational, and temporary/seasonal support positions. Grantee may allocate grant funds among these public purposes without further notice to or permission of CTCL.

(Source: "Grant Agreement – Kane County (IL)," U.S. Alliance For Election Excellence, 12/1/22)

- o Grantees must also report to CTCL on how they've spent their grant.
 - 10. The Grantee shall produce a brief report explaining and documenting how grant funds have been expended in support of the activities described in paragraph 3. This report shall be sent to CTCL no later than January 31, 2025 in a format approved by CTCL and shall include with the report a signed certification by Grantee that it has complied with all terms and conditions of this Grant Agreement.

(Source: "Grant Agreement – Kane County (IL)," U.S. Alliance For Election Excellence, 12/1/22)

COMPLAINTS OF BIAS

Concerns Raised In North Carolina Over The U.S. Alliance for Election Excellence

- An email chain acquired through the public records process by HEP between the Brunswick County Republican Party and Sara LaVere, Board of Elections director in Brunswick, show the influence that CTCL and the Alliance are already having on local offices.
- The Brunswick County Republican Party received complaints about the local board of elections receiving an award from CTCL.

I received a few different email announcements about the Brunswick County Board of Elections and the nomination to receive an award from *Center for Tech and Civic Life*. This name triggered my memory and discussions after the 2020 election.

In those discussions, it was metnioned that the Democrats are going to concentrate on New Hanover and Brunswick counties along with other southern counties. New Hanover looks like it may be changing to Democrat now--Beasley won. Is Brunswick County next?

I did a bit of research (attached about CTCL) and they are not what Brunswick County is all about. I added links and provided clips of speeches. I ask you to be aware of what they bring to the table. Changes they may recommend may not be in our best interests. The county system is transparent and appears to run fairly. I am a poll worker and also did election integrity training.

I am very interested in our election process. Please take a look at CTCL.

(Source: Email Chain With Sara LaVere, "Re: Brunswick County Elections Award," 11/30/22)

• A Republican member of the Board of Elections then informed LaVere that it was the third concern received by the Brunswick County Republican Party.

Subject: FW: Brunswick County Board of Elections Award

This is the 3rd concern I have received about the organization presenting BC Bd of Elections a reward FYI

(Source: Email Chain With Sara LaVere, "Re: Brunswick County Elections Award," 11/30/22)

NC Election Official Defends CTCL

- LaVere defended the group from criticism using talking points and hyperlinks provided by the Alliance specifically to rebut public criticism of the program.
 - LaVere admitted that the county had already been using materials templated by CTCL and the Center for Civic Design, such as pocket voter guides, and that she had even participated in social media and poll worker trainings conducted by CTCL.
 - LaVere also noted that The Elections Group an Alliance member helped her write columns that were published during the recent election season.

When I heard about the opportunity to participate in the Alliance for Election Excellence, I had reservations solely because of the political pushback I might receive. I decided to put that aside and take advantage of the opportunity to learn more, and I stand behind my decision to participate.

I have personally worked with the Center for Tech and Civic Life, Democracy Fund, Elections Group, and the Center for Civic Design in the past.

- Remember the pocket voter guide we introduced in the primary election? The template was created by the Center for Civic Design with assistance from the Center Tech and Civic Life.
- The two election columns I published for this election? Those were written with assistance from the Elections Group
- Most of my social media posts during the general election came from templates provided by the Elections Group
- I attended a symposium with representatives of directors' associations from across the country in 2019 which was hosted by Democracy Fund.
- I have taken many trainings over the years provided by the Center for Tech and Civic Life including social media management and poll worker training.

(Source: Email Chain With Sara LaVere, "Re: Brunswick County Elections Award," 11/30/22)

Is this the same liberal nonprofit that was behind the 2020 grants program that faced so many legal questions?

CTCL, which is founding partner of the Alliance for Election Excellence, ran a COVID-19 grant program during the pandemic. The program was open to all legitimate local election departments and grants were distributed to nearly 2,500 U.S. election departments spanning 47 states. The minimum CTCL COVID-19 Response Grant amount was \$5,000, which was awarded to smaller localities across the country. The largest grant was awarded to New York City, totaling just over \$19 million. Over half of all grants nationwide went to election departments that serve fewer than 25,000 registered voters. The grant program was optional, so the list of grantees is a reflection of those election departments that decided to opt-in.

As part of a disinformation campaign to undermine voter confidence, more than a dozen frivolous lawsuits were filed to smear the CTCL COVID-19 Response Grants programs. Every judge — rejected these challenges, with one judge issuing a strongly-worded opinion that in one case labeled these challenges a "conspiracy theory."

Dubious Claims of Nonpartisanship

- In their Membership Agreement, the Alliance claims "total" commitment to nonpartisanship and says they will "never attempt to influence the outcome of any election. Period."
 - Despite this claim, CTCL and other Alliance partners have substantial ties to the Democratic Party, to partisan political campaigns, or to left-wing "dark money" funders.

We are dedicated to supporting election officials and local governments of all size, partisanship, and geography by providing tools and resources that allow officials to conduct safe, secure, trustworthy, and inclusive elections. Our commitment to nonpartisanship is total. We will never attempt to influence the outcome of any election Period.

(Source: "Membership Agreement," U.S. Alliance For Election Excellence)

 To counteract tampering accusations, the Alliance commits to never touch live ballots or equipment, give legal advice, or require implementation of their recommendations.

In addition, Alliance partners will never:

- Touch live ballots or ballot tabulating equipment
- Give legal advice
- · Require you to implement specific advice or recommendations

(Source: "Membership Agreement," U.S. Alliance For Election Excellence)

 However, acquired documents show that the Center for Secure and Modern Elections is specifically held out as a source of "legal" support to local offices that are members of the Alliance.

Resources, Ready to provide access from best-in-class partners in the alliance. Providing SOP for elections department. Can help with vote by mail, communications. Center for civic design is on the ready to help/coach. Help with plain language, usability access. Technology partner US digital response USDR - provide off the shelf software. PW management system, can do custom software. Stanford University Design Department - can help with design, brainstorming, etc. Center for Secure and Modern elections - legal, policy, political department. Can help with deciphering how to implement law. Also, CTCL - have funding available to provide.

(Source: "Notes From Interview 7/21/22," Brunswick County Board of Elections, 7/21/22)

CENTERS FOR ELECTION EXCELLENCE

Initial Participants

- The Alliance <u>announced</u> finalists for its "nonpartisan inaugural cohort of Centers for Election Excellence," recognizing jurisdictions "committed to leadership in election administration."
- The Alliance selects its Centers for Election Excellence based on three criteria:
 - o Excitement and willingness" for participation.
 - o Commitment to improve practices and procedures.

- Commitment to working with other members, sharing materials, and providing input.
- According to the Alliance, these jurisdictions have the opportunity to join together with a "bipartisan group of election officials" to support each other.
- The finalists include eight counties and two municipalities:
 - o Contra Costa County, CA
 - o Shasta County, CA
 - o Greenwich, CT
 - o Kane County, IL
 - o Macoupin County, IL
 - o Ottawa County, MI
 - o Clark County, NV
 - Brunswick County, NC
 - Forsyth County, NC
 - o Madison, WI
- None of the initial Centers for Election Excellence are located in states with bans or restrictions on "Zuck Bucks" in place.
 - Four of the Centers are located in states where a Democratic governor has vetoed private funding restrictions.
 - o The legislatures of Michigan, North Carolina, and Wisconsin have all passed bills to curb or eliminate the use of private funding for elections.

ALLIANCE MEMBERS

Center for Tech and Civic Life

- The <u>Center for Tech and Civic Life</u> is a political advocacy group launched to push for left-of-center election reforms.
- CTCL is led by Tiana Epps-Johnson who like the other CTCL founders is an <u>alumna</u> of the Democrat-affiliated New Organizing Institute (NOI), once <u>dubbed</u> the "Democratic Party's Hogwarts for Digital Wizardry."
 - o Epps-Johnson is also an Obama Foundation Fellow.
- The group <u>claims</u> to employ a team of "civic technologists, trainers, researchers, election administration and data experts" that connect local election officials with resources intended to "modernize" American elections.
- Major regular funders of CTCL include left-wing organizations like the <u>Skoll</u>
 <u>Foundation</u>, <u>Democracy Fund</u>, as well as Arabella Advisors' <u>New Venture Fund</u> and <u>Hopewell Fund</u>.
- In 2020, CTCL received hundreds of millions of dollars from Priscilla Chan and Mark

Zuckerberg to promote "safe and reliable" voting during the COVID-19 pandemic.

- These so-called "<u>Zuck Bucks</u>" were used to provide <u>funding</u> for nearly 2,500 election departments in 49 states.
- Republicans have <u>contended</u> that the so-called "Zuck Bucks" doled out by CTCL were used to benefit Democrats in 2020.
 - Analysis by the <u>Capital Research Center</u> found that counties that received more "Zuck Bucks" donations broke heavily for Joe Biden in Pennsylvania, Georgia, Arizona, Nevada, North Carolina, Texas, Virginia, Wisconsin, and Michigan.
 - o Moreover, spending of Zuck Bucks prompted lawsuits in Louisiana.
 - 24 states have now passed <u>bans</u> on "Zuck Bucks," while efforts in five other states
 including <u>North Carolina</u> received vetoes from Democrat governors.
- Forsyth County Board of Elections Director, <u>Tim Tsujii</u>, sits on the advisory committee of CTCL.

Other Alliance Members

- The U.S. Alliance for Election Excellence includes a range of other members that have been at the forefront of the left's attempt to influence election operations.
- The Institute for Responsive Government (IRG) & <u>Center for Secure and Modern Elections</u> (CSME) purport to be neutral elections-focused advocacy group, but are actually pushing left-wing priorities like automatic voter registration and voter "modernization" protocols.
 - CSME and IRG are run by Arabella Advisors' New Venture Fund as <u>registered</u> trade name.
 - Arabella Advisors' network including the New Venture Fund <u>raked in</u> over \$1.5 billion in donations during 2021 alone.
 - o CSME is also a party to Louisiana's <u>lawsuit</u> about the influence of "Zuck Bucks."
- The <u>Center for Civic Design</u> is a nonprofit that provides ready-made graphics and other materials that election offices can use to promote voting information.
 - The group has argued that poorly structured ballots have <u>contributed</u> to major
 Democratic losses, specifically <u>citing</u> George W. Bush's 2000 victory over Al Gore.
 - The Center <u>argues</u> that ballot measures should be written in plain English, instead of language they say is used to "purposely confuse" voters.
 - The group regularly receives donations from left-wing dark money groups, including Pierre Omidyar's <u>Democracy Fund</u> and Arabella's <u>New Venture Fund</u>.
- The <u>Stanford University's Institute of Design</u> is a school focused on developing the creative abilities of students to help "impact the world."
 - Among its competencies is a "designing for social change" <u>program</u> dedicated to empowering "leaders and practitioners in the nonprofit, philanthropy, government, and social impact fields" to work in a more effective way.

- <u>The Elections Group</u> provides advice, resources, and "direct management support" for elections officials.
 - o In 2020, CTCL <u>paid</u> The Elections Group \$250,000 to consult on the awarding of its "Zuck Bucks" grants.
 - o In 2021, the Georgia Star <u>reported</u> that Fulton County (GA) was considering awarding The Elections Group a \$570,000 contract to revamp their voting systems.
 - Jennifer Morrell <u>left</u> her consultant position with the Democracy Fund to co-found The Elections Group.
- Prototyping Systems Lab, a member of the Alliance, is a design lab <u>based out</u> of the University of California, Davis.
 - The lab's participation in the Alliance is an <u>offering</u> of its chief professor's –
 Thomas Maiorana assistance in the development of "rapid prototyping at a systems scale."
 - The lab has <u>worked</u> in the past with Stanford University's design school in projects to protect voter participation in the Fall 2020 election.
- Formed during the COVID-19 pandemic, <u>U.S. Digital Response (USDR)</u> helps state and local governments by providing tech strategists, software, and talent.
 - o Through 2021, the group touts that it <u>worked</u> on more than 300 projects with governments in 37 U.S. states and territories.
 - o In 2020, USDR received a <u>grant</u> from CTCL's "Zuck Bucks" award to assist local governments with developing online election tools.

APPENDIX

"Membership Agreement," U.S. Alliance For Election Excellence



U.S. Alliance for Election Excellence

Membership Agreement

We're thrilled you're here. This document lays out the rules and guidelines for participation in the U.S. Alliance for Election Excellence (the "Alliance"). This is a legal document. Please read it carefully, and please ask any questions you may have. You must consult your legal counsel to ensure that your participation complies with all applicable laws in your jurisdiction. If you have any questions for us, please feel free to reach out to our team to discuss in more detail.

Alliance Goals and Purpose:

The Alliance is here to learn from election officials, inspire them to excellence, and celebrate their success. To accomplish these goals, the Alliance will develop and establish a nonpartisan, nationwide certification program so that jurisdictions meeting certain performance standards may hold themselves out as Centers for Excellence.

Commitment to Nonpartisanship:

We are dedicated to supporting election officials and local governments of all size, partisanship, and geography by providing tools and resources that allow officials to conduct safe, secure, trustworthy, and inclusive elections. Our commitment to nonpartisanship is total. We will never attempt to influence the outcome of any election. Period.

In addition, Alliance partners will never:

- Touch live ballots or ballot tabulating equipment
- Give legal advice
- Require you to implement specific advice or recommendations

Benefits of Membership:

At this point in time, centers can choose to join the Alliance at the basic membership level or premium membership level. Both tiers reflect a paid membership model.

Basic Membership:

- Curated access to a selection of off-the-shelf, publicly-accessible election administration resources, document templates, and training materials
- Center-specific coaching and consulting from select Alliance partners, in the form of a \$800 credit towards the fair market value of Alliance partners' hourly consulting services
- Access to numerous multi-center group coaching and consulting sessions hosted by select Alliance partners on an hourly basis
- Invitations to numerous live and recorded trainings and demos hosted by select Alliance partners, as well as facilitated discussions among centers concerning topics related to best practices in election administration

Premium Membership: Includes services included in Basic Membership, plus:

- Center-specific coaching and consulting from select Alliance partners, in the form of a \$3,040 credit towards the fair market value of Alliance partners' consulting services on an hourly basis
- Additional multi-center group coaching and consulting sessions hosted by select Alliance partners on an hourly basis
- Additional invitations to live and recorded trainings and demos hosted by Alliance partners, as well as additional facilitated discussions among centers

Obligations of Membership:

Centers agree to pay annual membership dues to the Alliance and to make non-monetary (but highly significant) contributions to the broader activities of the Alliance. These non-monetary contributions are key components of Alliance membership, and—in addition to membership dues—are offered as bona fide consideration in exchange for the fair market value of Alliance partners' services.

Non-Monetary Contributions

A core purpose of the Alliance is to promote the exchange of information about best practices in all directions: from the Alliance partners to centers, between centers, and from centers to the Alliance. One outcome of this exchange of information will be the creation of Values and Standards for Election Excellence ("the Standards"), which reflect nonpartisan excellence in election administration for local election departments across the county. Centers agree to contribute to the creation of the Standards by:

- Attending and participating in events hosted by the Alliance for the purpose of defining and developing the Standards;
- Attending and participating in events hosted by the Alliance for the purpose of developing measurements, tools, trainings, and materials to help election jurisdictions achieve the Standards;
- Providing written and verbal feedback on documents, forms, templates, and trainings generated by the Alliance that are related to the Standards;
- Sharing local best practices and, where permissible, non-confidential forms, templates, and documents with the Alliance to be used as models for other election jurisdictions seeking to achieve the Standards;
- Offering advice and support to Alliance partners and other centers;
- Sharing non-sensitive, non-confidential technical data and usage statistics and providing feedback about any Standards-related digital tools offered by Alliance partners and implemented by the center; and

Membership Dues

In addition to the participation requirements detailed above, centers agree to pay yearly dues to the Alliance in the following amounts:

Basic Membership: \$1,600/year
Premium Membership: \$4,800/yea

Membership is valid for one calendar year and is renewable on an annual basis. If desired, you may pre-pay for more than one year of membership; simply contact us for arrangements.

Scholarships:

The Alliance has scholarship funds available to cover your membership dues in full, if doing so is permitted by law in your jurisdiction. By signing below, you agree to accept the Alliance's scholarship and certify that doing so complies with applicable legal requirements. The Alliance will not send you an invoice for membership dues.

If you would like to decline the scholarship, simply contact us for arrangements.

Termination:

Participation can be terminated by any party for any reason. Refunds of Alliance member dues will be offered on a pro-rated basis based upon the Alliance partner services utilized as of the termination date.			
	embership, please sign and date below.		
Signature:	Date:		
Printed Name:			
Signed on behalf of:			
Legal counsel to signatory:			
Signature:	Date:		
Printed Name:			
Signed on behalf of:			

Email Chain With Tim Tsuji, "Re: Next Steps With The Alliance: Membership Agreement," 11/22/22

Next steps with the Alliance: Membership agreement

Sophie Lehman <sophie@techandciviclife.org>

Tue 11/22/2022 4:38 PM

To: Tsujii, Tim <tsujiidt@forsyth.cc>

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Tim.

Congratulations on your designation as a finalist in the inaugural cohort of Centers for Election Excellence! We're excited for the public announcement on Wednesday – we'll be cheering you on.

In addition to celebrating your work, compliance with federal, state, and local laws is a top priority for the Alliance. This means that we've been meeting with Alliance partners and our expert legal team to design a membership structure so jurisdictions from across the country can participate in the program. To be clear, this is a pivot from our original vision that would have offered Alliance programming for free, and it reflects our commitment to integrity and compliance.

You'll receive a membership agreement after the Thanksgiving holiday. The agreement will include the benefits and obligations of Alliance membership along with a basic membership option and a premium option. The agreement will also describe scholarship options available to jurisdictions on a purely voluntary basis where such support is consistent with applicable law.

After you receive the membership agreement, we and our legal team will be available to talk through any questions you and your local counsel may have.

Thank you for your patience on this matter. As I've shared, compliance is a top priority for the Alliance and we look forward to sharing the membership agreement with you soon.

Нарру	Thanksgiv	ing,	
Sophie			
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Sophie Lehman (she/her)
Associate Director
Center for Tech and Civic Life
www.techandciviclife.org

"Notes From Interview 7/21/22," Brunswick County Board of Elections, 7/21/22

Notes from Interview 7/21/22 Whitney May

This is a partnership. I get something and give something.

2-year commitment

Start fall 2022, through 2024

What I can expect to get

3 buckets of commitment

Coaching. They commit to help us improve our office operation. Will have a coach from elections group. Noah and Jennifer Morrell Chris Piper Tina Barton TJ

Schedule a site visit this fall. It's an assessment, take a snapshot of our operations. This is current state, what is future state. Put together an improvement plan. Drafted by elections group. I will have input and approval. Goal is 1stQ 2023.

Resources. Ready to provide access from best-in-class partners in the alliance. Providing SOP for elections department. Can help with vote by mail, communications. Center for civic design is on the ready to help/coach. Help with plain language, usability access. Technology partner US digital response USDR - provide off the shelf software. PW management system, can do custom software Stanford university design department - can help with design, brainstorming, etc. Center for Secure and Modern elections - legal, policy, political department. Can help with deciphering how to implement law. Also, CTCL - have funding available to provide.

Community Space. 3rd Bucket - create space for us and other centers to connect and learn.

Across country - primarily zoom meetings. Stanford facilitates sessions. 15-25 in total for cohort. Maybe have sub-cohorts on specific topics. Maybe based on size.

Funds for travel available. So important to go to other offices to see how they're organized, how they use color coding, etc.

My commitment, expectations from me

Committing to continue to improve operations. They provide us the resources and coaching; work happens by me and my team.

Share feedback and materials. Love to draft something and get feedback from us. Be open to sharing our materials with other centers. Create best practices, etc. Open to visiting other departments and having visitors

3rd bucket

Of, by, and for election officials. 5-year bold strategy, building from scratch. Want 15-25 centers to be the biggest partners.

- 1. Need my help envisioning and defining values and standards for election excellence. What is the north star. Standards any election department can achieve. Participating in workshops and conversations. Will take 1-6 hours per month.
- 2. Part of hypothesis for 5-year strategy is to incentivize buy in from all election offices. Incentive would be to create certification program. Celebrate offices that use standards. CERA certifies individual, this would certify the office/department. 1-6 hours per month.

They want a diverse group. Want a program that can work in any size department, any political climate.

August is paperwork month. Will formalize with paperwork. Who do we want buy in from? My board, and Karen.

Communications. When this goes public, mid-October, this is the first co-hort. There will be people who want us to succeed and cheer us on. There will also be those who are not happy about it. There will be negative media attention.



U.S. Alliance for Election Excellence

December 1, 2022

Kane County Clerk John A. Cunningham 719 S. Batavia Ave. Bldg. B Geneva, IL 60134

I am pleased to inform you that based on and in reliance upon the information and materials provided by Kane County the Center for Tech and Civic Life ("CTCL"), a nonprofit organization tax-exempt under Internal Revenue Code ("IRC") section 501(c)(3), has decided to award a grant to support the work of Kane County ("Grantee").

The following is a description of the grant:

AMOUNT OF GRANT: \$2,000,000 USD

Amount	\$650,000	\$1,350,000
Disbursement date	December 2022	December 2023

PURPOSE: CTCL is dedicated to educating the public about government and democracy in the United States and to working with government agencies to develop the skills, strategies and tools to engage their citizens. CTCL has decided to make this grant to support activities that are consistent with these purposes. The grant funds must be used exclusively for the public purpose of planning and operationalizing safe and secure election administration infrastructure in Kane County ("Purpose").

Before CTCL transmits these funds to Grantee, CTCL requires that Grantee review and sign this agreement ("Grant Agreement") and agree to use the grant funds in compliance with the Grant Agreement and with United States tax laws and the laws and regulations of your state and jurisdiction ("Applicable Laws"). Specifically, by signing this letter Grantee certifies and agrees to the following:

- Grantee is a local government unit or political subdivision within the meaning of IRC section 170(c)(1).
- This grant shall be used only for the Purpose described above, and for no other purposes.

- 3. The amount of the grant shall be expended on the following specific election infrastructure needs: 1) Key Physical Components: Equipment and materials, facilities, and records, including voting locations, technical facilities, storage facilities, processing facilities, administrative facilities, and voting hardware; 2) Key Technological Components: Hardware and software components critical to supporting the election security mission, including computers, servers, databases, and other IT systems and assets used in election administration activities; and 3) Key Human Components: Personnel with specialized training, certification, knowledge, skills, authorities, or roles whose absence could cause undesirable consequences or hamper the election security mission, including strategic, operational, and temporary/seasonal support positions. Grantee may allocate grant funds among these public purposes without further notice to or permission of CTCL.
- 4. Grantee shall not use any part of this grant to make a grant to another organization, except in the case where the organization is a local government unit or political subdivision within the meaning of IRC section 170(c)(1) or a nonprofit organization tax-exempt under IRC section 501(c)(3), and the subgrant is intended to accomplish the Purpose of this grant. Grantee shall take reasonable steps to ensure that any such subgrant is used in a manner consistent with the terms and conditions of this Grant Agreement, including requiring that subgrantee agrees in writing to comply with the terms and conditions of this Grant Agreement.
- 5. Grantee is authorized to receive this grant from CTCL and certifies that (a) the receipt of these grant funds does not violate any Applicable Laws, and (b) Grantee has taken all required, reasonable and necessary steps to receive, accept and expend the grant in accordance with the Purpose and Applicable Law.
- Grantee agrees to use all grant funds exclusively for charitable or educational purposes consistent with Code Sections 501(c)(3) and 170(c)(2)(B).
- 7. This grant is not earmarked or designated for transmittal to any other entity or person, whether or not mentioned in any proposal or other correspondence between Grantor and Grantee. Grantee accepts full discretion and control of the grant and its disposition and responsibility for complying with this Agreement's terms and conditions.
- 8. Grantee agrees that grant funds will not be used: (i) to attempt to influence the outcome of any specific public election, or to participate in, or intervene in (including the publishing or distributing of statements) any political campaign on behalf of (or in opposition to) any candidate for public office; (ii) to attempt to influence the selection, nomination, election or appointment of any individual to any public office or office in a political organization within the meaning of Code Section 527(e)(2); (iii) for any activity that is in violation of federal, state or local law or any effort to induce or encourage violations of law or public policy; (iv) to cause any private inurement or improper private benefit to occur; or (v) in any manner inconsistent with charitable

- and educational purposes defined under Code Section 501(c)(3).
- The grant project period of June 15, 2022 through December 31, 2024 represents the
 dates between which covered costs may be applied to the grant. The Grantee shall
 expend the amount of this grant for the Purpose by December 31, 2024.
- 10. The Grantee shall produce a brief report explaining and documenting how grant funds have been expended in support of the activities described in paragraph 3. This report shall be sent to CTCL no later than January 31, 2025 in a format approved by CTCL and shall include with the report a signed certification by Grantee that it has complied with all terms and conditions of this Grant Agreement.
- 11. This grant may not supplant previously appropriated funds. The Grantee shall not reduce the budget of the Kane County Clerk ("the Election Department") or fail to appropriate or provide previously budgeted funds to the Election Department for the term of this grant. Any amount supplanted, reduced or not provided in contravention of this paragraph shall be repaid to CTCL up to the total amount of this grant.
- 12. CTCL may discontinue, modify, withhold part of, or ask for the return all or part of the grant funds if it determines, in its sole judgment, that CTCL is required to do so to comply with applicable laws or regulations.

Your acceptance of and agreement to these terms and conditions and this Grant Agreement is indicated by your signature below on behalf of Grantee. Please have an authorized representative of Grantee sign below, and return a scanned copy of this letter to us by email at nareth@techandciviclife.org.

On behalf of CTCL, I extend my best wishes in your work.

Sincerely,

Tiana Epps Johnson

tiana m. johnyon

Executive Director

Center for Tech and Civic Life

GRANTEE

Ву: _____

Title: _____

Date:

Email Chain With Sara LaVere, "Re: Brunswick County Elections Award," 11/30/22

RE: Brunswick County Board of Elections Award △ S Reply S Reply All → Forward □ ··· □ ·· □ grpelton@usa.net Wed 11/30/2022 11:49 AM To 'Sara Lavere (1) Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message CAUTION: This email originated from outside of Brunswick County Government. Do not click links or open attached Let me digest what you have here. From: Sara Lavere <sara.lavere@brunswickcountync.gov> Sent: Wednesday, November 30, 2022 11:21 AM To: grpelton@usa.net If elections were properly funded, we may not be in need of groups like this to step in and bridge the gap. Take, for example, the State Board of Elections. The General Assembly is not funding the SBOE to the extent they need to modernize our registration database and provide adequate support for the county BOEs. They are having to lay off county support personnel because they were only funded because a federal HAVA grant was received. When we received the grant in 2020 from the Center for Lech and Givic Life, there were no strings attached. Lompleted an application, decided how the money would be spent, received the money, and spent it as intended - to fund the part time staff necessary to manage the magnitude of absentor voting When I heard about the opportunity to participate in the Alliance for Election Excellence, I had reservations solely because of the political pushback I might receive. I decided to put that aside and take advantage of the opportunity to learn more, I have personally worked with the Center for Tech and Civic Life, Democracy Fund, Elections Group, and the Center for Civic Design in the past. . Remember the packet voter guide we introduced in the primary election? The template was created by the Center for Civic Design with assistance from the Center for Tech and Civic Life. The two election columns I published for this election? Those were written with assistance from the Elections Group Most of my social media posts during the general election came from templates provided by the Elections Group I attended a symposium with representatives of directors' associations from across the country in 2019 which was hosted by Democracy Fund. I have taken many trainings over the years provided by the Center for Tech and Civic Life including social media management and poll worker training. Private funding to the election department is corrosive and corrupts the process. Why is it necessary? Philianthropic funding is often used to supplement common government services from the parks department to local libraries. Unfortunately, our Congress and many states have declined to make the kind of predictable investments in funding to election departments that are truly necessary to run accessible and secure elections. According to a recent study from MIT, public spending on election administration ranks near the bottom, about the same as what local governments spend on Is this the same liberal nonprofit that was behind the 2020 grants program that faced so many legal questions? CTCL, which is the founding partner of the Alliance for Election Excellence, ran a COVID-19 grant program during the pandemic. The program was open to all legitimate local election departments and grants were distributed to nearly 2,500 U.S. election departments spanning 47 states. The minimum CTCL COVID-19 Response Grant amount was \$5,000, which was awarded to smaller localities across the country. The largest grant was awarded to New York City, totaling just over \$19 million. Over half of all grants nationwide went to election departments that serve fewer than 25,000 repistered voters. The grant program was optional, so the list of grantees is a reflection of those election departm As part of a disinformation campaign to undermine voter confidence, more than a dozen frivolous lawsuits were filed to smear the CTCL COVID-19 Response Grants program. Every judge — co Supreme Court Justices — rejected these challenges, with one judge issuing a strongly-worded opinion that in one case labeled these challenges a "conspiracy theory. In the United States District Court for the District of Colorado, Magistrate Judge N. Seid Neuroiter ordered sanctions against a pair of attorneys who filed a frivolous challenge to the grant program, stating their lawsuit "is one enormous conspiracy theory." The court ordered the attorneys to pay the defense counsel's legal fees. In the opinion, the judge noted: In the summer of 2022, a unanimous, bipartisan vote by the Federal Flection Commission rejected fantastical claims about the greats arogram. The regulator rejected those claims in 6-0 votes — a rare show of unanimity by the commissioners, who are split evenly by party.

Read more here about how challenges to the COVID-19 Response Great Program were everyhelmingly rejected on a bipartisan basis, Facts about the 2020 program can be found here.

Sara LaVere | Elections Director Brunswick County Board of Elections 75 Stamp Act Drive, Building H PO Box 2 | Bolivia, NC 28422 Phone: 910.253.2620 | Fax: 910.253.2618 Direct phone: 910.253.2621

From: grpelton@usa.net <grpelton@usa.net>

To: Sara Lavere <sara.lavere@brunswickcountync.gov2 Subject: FW: Brunswick County Board of Elections Award

CAUTION: This email originated from outside of Brunnwick County Government. Do not click links or open attachments unless you recognize the sender and know the content is safe.

FYI

From: billmoore622 <billmoore622@gmail.com>

Sent: Monday, November 28, 2022 4:06 PM

To: for frankwilliams.org <fw@frankwilliams.org>; Randy Pelton <grpelton@usa.net>; Sara LaVere <sara.levere@brunswickcountync.gov> Subject: FW: Brunswick County Board of Elections Award

This is the 3rd concern I have received about the organization presenting BC Bd of Eletions a reward

BILL

Sent from my Verticon, Samoung Galaxy smartphone

- Original message -

From: A Kiel <poogank@gmail.com> Date: 11/28/22 12:19 PM (GMT-05:00)

To: billmoorefi22@gmail.com

Cc: michael: whatev@nccon.org, North Carolina Republican Party Bill Whatley <info@ncgon.org>
Subject: Brunswick County Board of Elections Award

I received a few different email announcements about the Brunswick County Board of Elections and the nomination to receive an award from

Center for Tech and Civic Life. This name triggered my memory and discussions after the 2020 election.

In those discussions, it was mentioned that the Democrats are going to concentrate on New Hanover and Brunswick counties along with other southern counties. New Hanover looks like it may changing to Democrat now-Beasley won. Is Brunswick County next?

I did a bit of research (attached about CTCL) and they are not what Brunswick County is all about. I added links and provided clips of speeches. I ask you to be aware of what they bring to the tich Changes they may recommend may not be in our best interests. The county system is transparent and appears to run fairly. I am a poll worker and also did election integrity training.

I am very interested in our election process. Please take a look at CTCL.

Amanda Kiel poogank@gmail.com