

STATE OF MICHIGAN
COURT OF CLAIMS

BRENDA POLASEK-SAVAGE and)
GREGORY A. BEHLING,)

Plaintiff,)

v.)

JOCELYN BENSON, in her official)
capacity as SECRETARY OF STATE,)

and)

OAKLAND COUNTY, MICHIGAN,)

Defendants.)

Case No. 20 - 006217 - mm

VERIFIED COMPLAINT FOR
DECLARATORY AND
INJUNCTIVE RELIEF

RECEIVED
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COURT OF CLAIMS

VERIFIED COMPLAINT FOR IMMEDIATE DECLARATORY
AND INJUNCTIVE RELIEF

There is no other pending or resolved civil
action arising out of the transaction or
occurrence alleged in the complaint.

SUMMARY OF THIS LAWSUIT

Michigan's Constitution and Michigan election law guarantee every eligible, registered Michigan voter the right to cast a ballot in elections conducted in conformance with the constitutional guarantee of "equal protection" and the "purity of elections." The Secretary of State is Michigan's "chief election officer" and shall have "supervisory control over local election officials in" the conduct and administration of Michigan elections.

To assure this constitutional guarantee of equal protection and purity of elections, Michigan law provides that poll "challengers" can monitor election officials' conduct of elections and assure that the election is conducted in accord with Michigan's Constitution and Election Code. Individuals who have been designated as a "challenger" under Michigan

law are allowed to observe the conduct of the election and object to any irregularities. The Michigan Legislature adopted provisions allowing qualified individual Michigan voters to observe (and where appropriate) object to, the conduct of the election to provide transparency and assure Michigan elections are conducted lawfully.

Challengers play a critical role in assuring the integrity of Michigan elections. Michigan's Election Code, MCL 168.734, provides: "Any officer or election board who shall prevent the presence of any such challenger as above provided, or shall refuse or fail to provide such challenger with conveniences for the performance of the duties expected of him, shall, upon conviction, be punished by a fine not exceeding \$1,000.00, or by imprisonment in the state prison not exceeding 2 years, or by both such fine and imprisonment in the discretion of the court."

Oakland County is attempting to restrict the role of challengers by denying challengers access to absentee ballot counting locations and limiting the number of challengers to a single individual in one of three buildings where Oakland County is counting absent voter ballots. These three centralized counting facilities will process the absent voter ballots cast by Michigan voters from more than one hundred and thirty precincts, which include townships, villages, cities, and other election jurisdictions within Oakland County.

Oakland County will be processing hundreds of thousands of ballots from hundreds of election jurisdictions in these central counting facilities on Tuesday morning, November 3. Oakland County wants to limit the challengers to a single individual challenger in each building and in so doing, deny other qualified challengers from being present when ballots are processed and counted. Oakland County and Secretary Benson are violating MCL 168.734.

Oakland County's scheme violates Michigan voters' right to equal protection, violates Michigan citizens' constitutional right to "Purity of Elections," and prevents Michigan voters from having the transparency and accountability provided by Michigan law.

Secretary of State Benson is Michigan's "chief election officer" who must make sure that Oakland County conducts this Presidential election in accordance with Michigan's constitutional guarantees to equal protection of the law and the "purity of elections" and Michigan's Election Code.

These Michigan voters and poll challengers ask this Court to order Secretary of State Benson to direct Oakland County to allow challengers

to participate as provided in MCL 168.730-168.734 so that all of the certified challengers of each political party and interested organization may meaningfully fulfill their duties as challengers as defined by Michigan law.

PARTIES

A. Brenda Polasek-Savage and Gregory A. Behling are Oakland County voters and designated challengers under MCL 168.730-168.734.

1. Brenda Polasek-Savage is a Michigan citizen and a registered and eligible voter residing in Oakland County. Brenda Polasek-Savage has been designated by the Election Integrity Fund an election challenger under MCL 168.730 to oversee (and when appropriate) challenge the counting of ballots during the November 3, 2020 general election in Oakland County Michigan.

2. Gregory A. Behling is a Michigan citizen and a registered and eligible voter residing in Oakland County. Gregory A. Behling has been designated by the Election Integrity Fund an election challenger under MCL 168.730 to oversee (and when appropriate) challenge the counting of ballots during the November 3, 2020 general election in Oakland County Michigan.

3. Brenda Polasek-Savage and Gregory A. Behling have been trained and credentialed and are planning to participate as election challengers in Oakland County to observe the conduct of the election and Oakland County's processing of absent voter ballots. Oakland County has restricted the rights of Polasek-Savage, Behling, and other similarly situated, credentialed and trained challengers to meaningfully observe the processing of absent voter ballots. Oakland County's denial of any more than one individual in each of the three buildings where Oakland County will be processing absentee ballots and Oakland County's restriction of Polasek-

Savage, Behling, and other challengers violates Michigan law and Michigan's Constitution.

4. Brenda Polasek-Savage and Gregory A. Behling seek relief for themselves and on behalf of other similarly situated Michigan voters and election challengers. There are many other Michigan voters who have been trained and credentialed as election challengers who are planning to participate as challengers.

B. Jocelyn Benson is Michigan's Secretary of State and, as such, is responsible for overseeing Oakland County's conduct of the 2020 presidential election.

5. Jocelyn Benson is Michigan's Secretary of State and is the "chief elections officer" responsible for overseeing the conduct of Michigan elections. MCL 168.21 ("The secretary of state shall be the chief election officer of the state and shall have supervisory control over local election officials in the performance of their duties under the provisions of this act."); 168.31(1)(a) (the "Secretary of State shall ... issue instructions and promulgate rules ... for the conduct of elections and registrations in accordance with the laws of this state"). Local election officials must follow Secretary Benson's instructions regarding the conduct of elections. Michigan law provides that Secretary Benson "[a]dvise and direct local election officials as to the proper methods of conducting elections." MCL 168.31(1)(b). *See also Hare v. Berrien Co Bd. of Election*, 129 N.W.2d 864 (Mich. 1964); *Davis v. Sec'y of State*, 2020 Mich. App. LEXIS 6128, at *9 (Mich. Ct. App. Sep. 16, 2020).

6. Secretary Benson is responsible for assuring Michigan's local election officials (which includes Oakland County) conduct elections in a fair, just, and lawful

manner. See MCL 168.21; 168.31; 168.32. See also *League of Women Voters of Michigan v. Secretary of State*, 2020 Mich. App. LEXIS 709, *3 (Mich. Ct. App. Jan. 27, 2020); *Citizens Protecting Michigan's Constitution v. Secretary of State*, 922 N.W.2d 404 (Mich. Ct. App. 2018), *aff'd* 921 N.W.2d 247 (Mich. 2018); *Fitzpatrick v. Secretary of State*, 440 N.W.2d 45 (Mich. Ct. App. 1989).

C. Oakland County must conduct elections under the Secretary of State's supervision in conformity with Michigan law.

7. Oakland County is a political subdivision of the State of Michigan. Oakland County has an Elections Division that conducts elections taking place within Oakland County under and subject to Secretary of State Benson's supervision and direction.

JURISDICTION AND STANDING

8. The Court of Claims has "exclusive" jurisdiction to "hear and determine any claim or demand, statutory or constitutional," or any demand for "equitable[] or declaratory relief or any demand for an extraordinary writ against the state or any of its departments or officers notwithstanding another law that confers jurisdiction of the cast in the circuit court." MCL 600.6419(1)(a).

9. These Michigan citizens and election challengers bringing this case have a special and substantial interest in assuring that Oakland County processes the ballots Michigan citizens cast according to Michigan law so that every lawful Michigan voter's ballot is lawfully cast and equally processed and counted.

10. These Michigan electors and challengers raise statutory and constitutional claims asking this Court to order equitable, declaratory, and

extraordinary relief against Secretary of State Benson and Oakland County. This Court has exclusive jurisdiction to hear these claims. Venue is appropriate in this Court.

11. An actual controversy exists between these Michigan electors and challengers and Secretary of State Benson and Oakland County. These Michigan citizens and voters have suffered, or will suffer, an irreparable constitutional injury should Oakland County restrict and deny a meaningful opportunity for these challengers to participate in the election and oversee the conduct of the election as provided by Michigan law. Secretary Benson has failed to ensure that Oakland County complies with Michigan law allowing challengers to meaningfully monitor the conduct of the election.

BACKGROUND

12. A general election will be held in the State of Michigan on November 3, 2020.

13. Oakland County has approximately 1,250,000 residents, over ten percent of Michigan's population with more than 400 election precincts.

14. Many cities, townships, villages and other election jurisdictions in Michigan have their own "absent voter counting boards," which have the responsibility of processing and tabulating absent voter ballots.

15. A political party, incorporated organization, or organized committee of interested citizens may designate one "challenger" to serve at each counting board. MCL 168.730.

16. An election challenger's appointed under MCL 168.730 has those responsibilities described at MCL 168.733.

17. An election challenger's legal rights are as follows:

- a. An election challenger shall be provided a space within a polling place where they can observe the election procedure and each person applying to vote. MCL 168.733(1).
- b. An election challenger must be allowed opportunity to inspect poll books as ballots are issued to electors and witness the electors' names being entered in the poll book. MCL 168.733(1)(a).
- c. An election Challenger must be allowed to observe the manner in which the duties of the election inspectors are being performed. MCL 168.733(1)(b).
- d. An election challenger is authorized to challenge the voting rights of a person who the challenger has good reason to believe is not a registered elector. MCL 168.733(1)(c).
- e. An election challenger is authorized to challenge an election procedure that is not being properly performed. MCL 168.733(1)(d).
- f. An election challenger may bring to an election inspector's attention any of the following: (1) improper handling of a ballot by an elector or election inspector; (2) a violation of a regulation made by the board of election inspectors with regard to the time in which an elector may remain in the polling place; (3) campaigning and fundraising being performed by an election inspector or other person covered by MCL 168.744; and/or (4) any other violation of election law or other prescribed election procedure. MCL 168.733(1)(e).
- g. An election challenger may remain present during the canvass of votes and until the statement of returns is duly signed and made. MCL 168.733(1)(f).
- h. An election challenger may examine each ballot as it is being counted. MCL 168.733(1)(g).
- i. An election challenger may keep records of votes cast and other election procedures as the challenger desires. MCL 168.733(1)(h).

- j. An election challenger may observe the recording of absent voter ballots on voting machines. MCL 168.733(1)(i).

18. Michigan values the important role challengers perform in assuring the transparency and integrity of elections. For example, Michigan law provides it is a felony punishable by up to two years in state prison for any person to threaten or intimidate a challenger who is performing any activity described in Michigan law. MCL 168.734(4); MCL 168.734. It is a felony punishable by up to two years in state prison for any person to prevent the presence of a challenger exercising their rights or to fail to provide a challenger with "conveniences for the performance of the[ir] duties." MCL 168.734.

19. The responsibilities of challengers are established by Michigan statute. MCL 168.730. This section states:

(1) At an election, a political party or [an organization] interested in preserving the purity of elections and in guarding against the abuse of the elective franchise, may designate challengers as provided in this act. Except as otherwise provided in this act, a political party [or interested organization] may designate not more than 2 challengers to serve *in a precinct* at any 1 time. A political party [or interested organization] may designate not more than 1 challenger to serve at each counting board.

(2) A challenger shall be a registered elector of this state. . . . A candidate for the office of delegate to a county convention may serve as a challenger *in a precinct* other than the 1 in which he or she is a candidate. . . .

(3) A challenger may be designated to serve *in more than 1 precinct*. The political party [or interested organization] shall indicate which *precincts* the challenger will serve when designating challengers under subsection (1). If more than 1 challenger of a political party [or interested organization] is serving in a *precinct* at any 1 time, only 1 of the challengers has the authority to initiate a challenge at any given time. The challengers shall indicate to the board of election inspectors which of the 2

will have this authority. The challengers may change this authority and shall indicate the change to the board of election inspectors.¹

20. MCL 168.730 provides a political party or interested organization may have one challenger per absent voter counting board. Oakland County has over 400 precincts, and one hundred thirty-four counting (134) boards operating at one time. Therefore, a qualified candidate or organization is allowed one hundred thirty-four challengers for the election jurisdictions being counted in Oakland County's three facilities.

21. Michigan's Election Code provides, "Presence of challenger in room containing ballot box; evidence of right to be present. ... [A challenger designated by any group] interested in the ... in preserving the purity of elections and in guarding against the abuse of the elective franchise, or of any political party in such county, township, city, ward or village, shall be sufficient evidence of the right of such challengers to be present inside the room where the ballot box is kept. ... The authority shall have written or printed thereon the name of the challenger to whom it is issued and the number of *the precinct* to which the challenger has been assigned." MCL 168.732 (emphasis added).

22. MCL 168.764d(9) provides that for a combined absent voter counting board established under 168.764d(1)(a), "The election inspectors appointed to an absent voter counting board established under subsection (1) shall comply with section 733(2) regarding election challengers." Section 733(2) provides, "the board of

¹ Emphasis added.

election inspectors shall provide space *for each challenger*, if any, at each counting board that enables the challengers to observe the counting of ballots. A challenger at the counting board may do 1 or more of the activities allowed in subsection (1)”

23. Subsection (1) of MCL 168.733 provides the following list of activities and duties of the challenger:

(1) The board of election inspectors shall provide space for the challengers within the polling place that enables the challengers to observe the election procedure and each person applying to vote. A challenger may do 1 or more of the following:

(a) Under the scrutiny of an election inspector, inspect without handling the poll books as ballots are issued to electors and the electors' names being entered in the poll book.

(b) Observe the manner in which the duties of the election inspectors are being performed.

(c) Challenge the voting rights of a person who the challenger has good reason to believe is not a registered elector.

(d) Challenge an election procedure that is not being properly performed.

(e) Bring to an election inspector's attention any of the following:

(i) Improper handling of a ballot by an elector or election inspector.

(ii) A violation of a regulation made by the board of election inspectors pursuant to section 742.

(iii) Campaigning being performed by an election inspector or other person in violation of section 744.

(iv) A violation of election law or other prescribed election procedure.

(f) Remain during the canvass of votes and until the statement of returns is duly signed and made.

- (g) Examine without handling *each ballot* as it is being counted.
- (h) Keep records of votes cast and other election procedures as the challenger desires.
- (i) Observe the recording of absent voter ballots on voting machines.

24. Oakland County is using a centralized absent voter counting board by which various cities, townships and other election jurisdictions involving hundreds of precincts will process and count absentee ballots case by voters in Oakland County's centralized board. A "counting board" is not an entity defined by Michigan's Election Code.

25. Oakland County contains over four hundred precincts.

26. At least one hundred thirty of these precincts, and likely many more, have chosen to use the three ballot processing locations in Oakland County to process the absentee ballots cast by voters residing in these jurisdictions.

27. Oakland County will process absent ballots in these different buildings.

See Exhibit 1.

28. Almost a million registered Michigan voters will cast their ballot in Oakland County. Early voting and absentee voting is at a historic high rate due to the corona virus. Oakland County has stated that the three absent voter processing facilities will process and count ballots cast by voters in at least one hundred thirty precincts in three buildings. And yet, Oakland County has declared that it will only allow a *single* individual challenger to be present in each building. *See Exhibit 1* ("Approved organizations that may have one (1) challenger present at each board.").

When contacted by telephone on October 30, 2020, Oakland County reaffirmed that will admit only one credentialed challenger per building.

29. Under Oakland County's order allowing only three challengers (one per building) each challenger will have to oversee the votes of more than forty precincts. This is an impossible task that will prevent the single challenger from meaningfully participating in this election and fulfilling their duties as a challenger under MCL 168.733.

30. Oakland County's one challenger per building restriction defeats the purpose of Michigan's law. A single individual challenger cannot possibly monitor the centralized, multi-precinct operation that will involve dozens of teams of election officials counting tens of thousands of ballots.

31. Oakland County's order denying other credentialed challengers access to the facilities where Oakland County is processing absentee ballots violates MCL 168.733.

32. The preceding paragraphs are incorporated in each of the following counts.

COUNT I

Secretary Benson violated the Equal Protection Clause of Michigan's Constitution.

33. Michigan's Constitution declares that "[n]o person shall be denied the equal protection of the laws" Const 1963, art 1, § 2.

34. This clause is coextensive with the United States Constitution's Equal Protection Clause. *Harville v. State Plumbing & Heating* 218 Mich. App. 302, 305-

306; 553 N.W.2d 377 (1996). *See also* *Bush v. Gore*, 531 U.S. 98, 104 (2000) (“Having once granted the right to vote on equal terms, the State may not, by later arbitrary and disparate treatment, value one person’s vote over that of another.”); *Harper v. Virginia Bd. of Elections*, 383 U.S. 663, 665, (1966) (“Once the franchise is granted to the electorate, lines may not be drawn which are inconsistent with the Equal Protection Clause of the Fourteenth Amendment.”)

35. These Michigan citizens and challengers seek declaratory and injunctive relief requiring Secretary Benson to direct that Oakland County allow a reasonable number of challengers (at least ten challengers per counting room) to observe the conduct of the election and processing of absentee ballots at each of the three buildings where Oakland County will be processing ballots.

COUNT II

Secretary Benson’s and Oakland County’s exclusion of challengers from absent voter ballot processing facilities violates Michigan voters’ rights under the Michigan Constitution’s “purity of elections” clause.

36. The Michigan Constitution’s “purity of elections” clause states, “the legislature shall enact laws to regulate the time, place and manner of all nominations and elections, to preserve the purity of elections, to preserve the secrecy of the ballot, to guard against abuses of the elective franchise, and to provide for a system of voter registration and absentee voting.” Const. 1963, art 2, §4(2).

37. “The phrase ‘purity of elections’ does not have a single precise meaning. But it unmistakably requires fairness and evenhandedness in the election laws of

this state.” *Barrow v. Detroit Election Comm.*, 854 N.W.2d 489, 504 (Mich. Ct. App. 2014).

38. Michigan statutes protect the purity of elections by allowing ballot challengers to monitor the counting and processing of absentee ballots. Oakland County has violated this constitutional guarantee by centralizing the processing and counting of hundreds of thousands of absentee ballots from hundreds of precincts at only three facilities and denying the political parties and interested organizations their statutory rights to have challengers observe and meaningfully participate in the process as is provided by MCL 168.730-736.

39. Oakland County’s centralized absentee ballot processing scheme that denies the political parties and interested organizations the ability to have more than one challenger per building violates Michigan Election Code and guarantee of purity of elections.

COUNT III

Secretary of State Benson and Oakland County are violating Michigan’s Election Code.

40. MCL 168.730 provides:

(1) At an election, a political party or [an organization] interested in preserving the purity of elections and in guarding against the abuse of the elective franchise, may designate challengers as provided in this act. Except as otherwise provided in this act, a political party [or interested organization] may designate not more than 2 challengers to serve *in a precinct* at any 1 time. A political party [or interested organization] may designate not more than 1 challenger to serve at each counting board.

(2) A challenger shall be a registered elector of this state. . . . A candidate for the office of delegate to a county convention may serve as a

challenger *in a precinct* other than the 1 in which he or she is a candidate. . . .

(3) A challenger may be designated to serve in more than 1 *precinct*. The political party [or interested organization] shall indicate which precincts the challenger will serve when designating challengers under subsection (1). If more than 1 challenger of a political party [or interested organization] is serving *in a precinct* at any 1 time, only 1 of the challengers has the authority to initiate a challenge at any given time. The challengers shall indicate to the board of election inspectors which of the 2 will have this authority. The challengers may change this authority and shall indicate the change to the board of election inspectors.²

41. The Michigan Election Code provides the challengers are determined based upon precincts. Oakland County's centralized, county-wide, three-building absentee ballot counting facilities will be from hundreds of precincts. The parties and interested organizations are entitled to have one challenger per precinct.

42. Secretary of State Benson and Oakland County election authorities have violated MCL 168.730-168.734 by allowing the Michigan voters and political parties and interested organizations only three individuals restricted to only one individual per building.

43. Michigan Election Code, MCL 168.734 provides:

Any officer or election board who shall prevent the presence of any such challenger as above provided, or shall refuse or fail to provide such challenger with conveniences for the performance of the duties expected of him, shall, upon conviction, be punished by a fine not exceeding \$1,000.00, or by imprisonment in the state prison not exceeding 2 years, or by both such fine and imprisonment in the discretion of the court.

² Emphasis added.

44. Oakland County's denial of these individual challengers' right to participate and observe the processing of absentee ballots cast by Oakland County voters violates Michigan's Election Code.

PRAYER FOR RELIEF

These Michigan citizens and voters ask this Court to:

A. Order "a speedy hearing" of this action and "advance it on the calendar" as provided by MCR 2.605(D);

B. Find that Secretary Benson and Oakland County have violated the Michigan Constitution's guarantee of Equal Protection and Purity of Elections and have violated MCL 168.730-168.734 by allowing Oakland County to deny challengers the opportunity to be present and meaningfully participate as challengers in the conduct of the election;

C. Order Secretary Benson to require Oakland County to allow candidates and interested organizations to have a reasonable number of challengers present in the centralized counting facilities able to meaningfully monitor the conduct of the election; and

D. Award these Michigan citizens the costs, expenses, and expert witness fees they incurred in this action as allowed by law.

Dated: November 2, 2020

Respectfully submitted,

/s/ Mark F. (Thor) Hearne, II
MARK F. (THOR) HEARNE, II
#P40231

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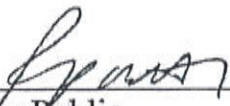
VERIFICATION

STATE OF MICHIGAN)
) ss
COUNTY OF OAKLAND)

I, Brenda Polasck-Savage being first duly sworn, depose and say that I am a resident of the state of Michigan and duly qualified as a voter in this state. While I may not have personal knowledge of all of the facts recited in this Complaint, the information contained therein has been collected and made available to me by others, and I declare, pursuant to MCR 2.114(B)(2), that the allegations contained in this Complaint are true to the best of my information, knowledge, and belief.

Brenda Polasck-Savage

Subscribed and sworn to before me this 30th day of October, 2020.

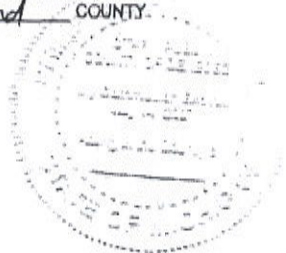

Notary Public

Genesee County, Michigan

My Commission Expires: May 14 2027

Acting in Oakland County, Michigan

PHILIP M. JOHNSTON JR.
NOTARY PUBLIC - MICHIGAN
GENESEE COUNTY
MY COMMISSION EXPIRES MAY 14, 2027
ACTING IN Oakland COUNTY



VERIFICATION

STATE OF MICHIGAN)
) ss
COUNTY OF OAKLAND)

I, Gregory A Behling being first duly sworn, depose and say that I am a resident of the state of Michigan and duly qualified as a voter in this state. While I may not have personal knowledge of all of the facts recited in this Complaint, the information contained therein has been collected and made available to me by others, and I declare, pursuant to MCR 2.114(B)(2), that the allegations contained in this Complaint are true to the best of my information, knowledge, and belief.

GA Behling

Subscribed and sworn to before me this 30th day of October, 2020.

[Signature]
Notary Public

Genesee County, Michigan

My Commission Expires: May 14 2027

Acting in Oakland County, Michigan

PHILIP M. JOHNSTON JR.
NOTARY PUBLIC - MICHIGAN
GENESEE COUNTY
MY COMMISSION EXPIRES MAY 14, 2027
ACTING IN Oakland COUNTY

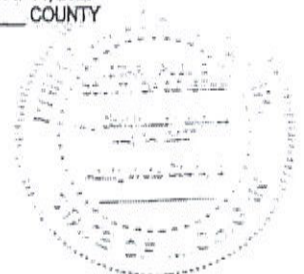


EXHIBIT 1

Oakland County Absent Voter Counting Board

Absentee Counting Board #1

Oakland Schools - Conference Center
2111 Pontiac Lake Rd.
Waterford, MI 48328

Processing Absentee Ballots for:

Cities – Berkley, Birmingham, Farmington, Ferndale, Huntington Woods, Oak Park, Pontiac, Pleasant Ridge, South Lyon, Walled Lake

Townships - Brandon, Holly, Royal Oak, Southfield

Absentee Counting Board #2

Oakland County Executive Office Building - Conference Center
2100 Pontiac Lake Rd.
Waterford, MI 48328

Processing Absentee Ballots for: City of Southfield

Absentee Counting Board #3

Oakland County Elections Division – Training Room
Building 14E
1200 N. Telegraph Rd.
Pontiac, MI 48341

Processing Absentee Ballots for: City of Royal Oak

Approved organizations that may have one (1) challenger present at each board:

Political Parties
Election Integrity Fund
Lawyers Committee for Civil Rights under Law
Michigan Election Reform Alliance
NAACP

Poll Watchers may be present as space permits. Please see the Location Manager to determine if space is available.

Challengers and Poll Watchers will be required to sign an oath, be sequestered upon entry until 8pm, are not permitted to possess any communication device and must wear a mask while inside the absent voter counting board.