

AFFIDAVIT OF RENEE MITCHELL

STATE OF MONTANA
County of Missoula

I, Renee Mitchell, personally appeared before the undersigned notary public,
under oath make the following statements:

1. I am a resident of Missoula County, Montana. I am over the age of
eighteen (18) years of age. I am mentally competent to swear that the matters, facts,
and things set forth in this affidavit are true and correct based on my personal
knowledge, unless otherwise stated.

2. Prior to January 4, 2021, Lyn Hellegaard told me that there would be a
count of the Affirmation Envelopes from the November 3, 2020, Missoula County
election. She asked if I would like to participate, and I agreed to help with the envelope
count.

3. At or about 9 a.m. on January 4, 2021, I and the other volunteers
convened at the Missoula County Fairgrounds building where the envelope count took
place. Upon entering the building, I saw numerous tables arranged throughout the large
room. Along one wall there was a long row of plain and identical-looking cardboard
boxes stacked two high and side to side atop tables. Closer to the entrance was a
check-in table where I presented my driver's license to Bradley Seaman as
identification. Other than Lyn Hellegaard, Quentin Rhoades, Freddie Thompson, Zona
Lindeman, and Bradley Seaman, I did not know, nor had I any acquaintance of the other
people present.

4. There were ten separate tables arranged throughout the room, with two chairs at each table for the volunteers.

5. Prior to beginning the envelope count, we received our instructions. County employees were to bring one box of envelopes to each of the ten tables and open it. The two counters seated at each table were to count and record every envelope in that box. We were told to use County election tally sheets and to disregard any names that had been pre-printed on them. Counters were instructed to use a fresh tally sheet for each box of envelopes that we counted, so there would be two (2) tally sheets per box, one completed by each counter.

6. Only County employees handled the boxes. They brought one sealed box to each of the ten tables where it would then be opened. The boxes were full of affirmation envelopes bundled in bunches of varying sizes and numbers. The bundles were wrapped with rubber bands. After removing individual bundles from the box, counting them, and recording the numbers, the counters replaced any of the rubber bands if they had been removed. Envelope counts were recorded on the tally sheets, using either a hash mark for each envelope or by counting the envelopes in each bundle and recording that number. The counted bundle was then set apart at the end of the table. This routine continued until all the envelopes in that box were counted. County employees would then put the bundles of counted envelopes back into the box and remove it from the room. Another box was then brought to the table, unsealed, and opened. We continued to repeat the process until all the envelopes in all the boxes that had been stacked on the tables along the wall had been presented to us and all the envelopes they contained had been counted and recorded.

7. Bradley Seaman was present throughout the process and was available for any questions we had regarding the envelopes. His team of election employees walked around the room, from table to table, as they observed the envelopes counts. They were also available to address questions.

8. During the count process, we occasionally ran across an unsigned and/or undated envelope. When that happened and inquiry was made, Lyn instructed us to count the envelope and make a note on the tally sheet. Some envelopes caused the volunteers enough concern that Bradley told us to go ahead and count them but also to remove them and give them to staff. After completing the envelope counts, we were asked by Lyn to total and record the counts on each sheet and to make sure we put our signature on each one of our sheets. We then gave the tally sheets to Lyn.

9. When I had finished, Lyn and another person were still counting envelopes from a "Special Box." The "Special Box" contained envelopes with notes attached to them, and they were also in bundles wrapped with rubber bands. I offered to help them, and my offer was accepted.

10. By around 1:30 p.m., we had completed the envelope count and had turned in all the tally sheets to Lyn.

11. On March 28, 2022, from 8:30 a.m. until around noon, I observed a recount of the envelopes. This count was conducted at one of the Missoula County election buildings on Russel Street. One of the first things to catch my eye, upon entering the room, was the long row of cardboard boxes stacked atop tables along one side of the room. The boxes were identifiable by easy-to-read numbers that had been written on the sides. They were marked "1 of 32," "2 of 32," "3 of 32," and so on, through

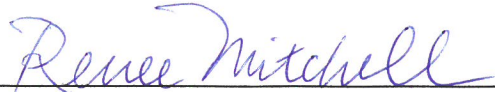
"32 of 32." I assumed these were the same boxes containing affirmation envelopes from the November 3, 2021, general election, but now they were marked with identifying numbers, which was not the case at the January 4, 2021, envelope count.

12. At the Russell Street Building, although cordoned off from the envelope counters, I was able to see that two people per table, seated on opposite sides of the tables, were removing rubber bands from the envelope bundles, counting them, and putting them into packets of twenty-five (25) before rewrapping them with rubber bands. After they finished counting and wrapping the envelopes in bundles of 25, the two people switched sides of their table and proceeded to recount each other's previously counted envelopes.

13. The people counting the envelopes, as is my understanding, were employees paid by the Missoula County elections office. Other people allowed inside the cordoned off area, as I understand, were members of the Missoula County Central Committee, who had chairs at separate tables from which they observed. Any other interested persons who wished to observe the process were asked to remain in the cordoned off area, which I estimated to be no fewer than 12 feet from the envelope counters. The observers seated at tables within the cordoned off area were at least 6 feet away from the envelope counters.

14. Bradley Seaman was available to address questions from observers.

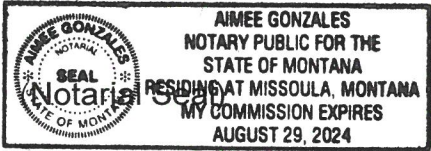
DATED this 11 day of April 2022.



Renee Mitchell

STATE OF MONTANA)
 : ss
County of Missoula)

This instrument was acknowledged before me on the 11TH day of April 2022, by
Renee Mitchell.



Aimee Gonzales

Notary Public for the State of Montana