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STATE OF MINNESOTA	DISTRICT COURT
COUNTY OF SCOTT	FIRST JUDICIAL DISTRICT

Aaron Paul, Contestant, v. Brad Tabke, Contestee.	CASE NO.: 70-CV-24-17210 Hon. Tracy Perzel

CONTESTANT'S REPLY IN SUPPORT OF ELECTION CONTEST

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Contestee's Response Brief makes several critical errors to which Contestant Aaron Paul wishes to respond.

First, Contestee significantly and incorrectly couches the posture of the Election Contest as one of certainty—a situation where Scott County and the City of Shakopee's maladministration of the 2024 General Election can be neatly resolved and concluded. Nothing can be further from the truth. While it is true that it is Election Director Julie Hanson's "best guess" that the County has identified 20 of the missing 21 ballots discarded by the City of Shakopee, there are significant inconsistencies and outstanding questions in an ongoing investigation that leave the universe of missing ballots at just that: a guess. Tx. 52:25 (J. Hanson). These inconsistencies are discussed in greater detail below.

Next, Contestee misstates the relevant legal standard of this Election Contest—vainly attempting to contort the standard beyond the demonstrable material irregularities that occurred in connection with this election. Contrastingly, Scott County Election Officials readily concede that that the conduct was "inappropriate, something that should not have happened", a "very large" error, and that it is "a big deal." TX. 59:12; 112:22 (J. Hanson). The standard for an election contest is more than met here.

Contestee, then, in direct violation of Minnesota law, suggests that the testimony of the voter witnesses can be used as substitute votes even though "for obvious reasons arising from the inviolable secrecy of the ballot, direct evidence as to how contested votes were cast is not allowed. . ." *Kearin v. Roach*, 381 N.W.2d 531, 533 (Minn. App. 1986) (*citing In re Mathison v. Meyer*, 199 N.W. 173, 173 (Minn. 1924)). Therefore, even if the universe of missing ballots was somehow conclusively known, it would be improper for this Court to use that testimony as proof of how those voters cast their ballots.

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Finally, Contestee fails to factually distinguish relevant case law demonstrating the obvious remedy here: a special election. Therefore, this Court should reticently acknowledge the unfortunate and irreparably tarnished nature of the 2024 General Election and order a new election to conclusively, freely, and fairly determine the true representative of District 54A in the Minnesota of Representatives.

I. Despite Contestee's Blithe Conclusions, It Remains Unknown Who Won the District 54A Election

The only clear conclusion concerning the November General Election is that material irregularities by City of Shakopee election officials led to ballots being lost beyond Contestee's putative margin of victory. Even the quantity of lost ballots remains unknown.[1] Tx. 22:14-18 (J. Hanson). These material irregularities rendered the election profoundly suspect and were conducted in a manner inconsistent with the policies and procedures of Scott County. Tx. 61:2-7 (J. Hanson).

Beyond that, much remains a "best guess" among competing theories in an ongoing investigation.

In the hearing, witnesses described at least **three** separate theories as to what caused Scott County to destroy at least 20 ballots in connection with the election. First, and most prominently, Scott County Election Director, Julie Hanson's "best guess" is that Shakopee City Clerk, Lori Henson, on or about October 18, 2024, opened 20 absentee ballots, cast between October 15-17, and then discarded them due to carelessness, or some other reason.

[1] The only definitive evidence of the missing ballots in the hands of election officials is that at some point they were entered into the SVRS system. That doesn't however answer the question of exactly when, how, or exactly which ballots were lost. Compounding this problem is the fact that 20 days lapsed before the ballots are unaccounted for an when the County discovered that ballots were missing.

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Theory number two is taken from the testimony of Election Judge, Kay Gamble. While Ms. Gamble's testimony largely tracks that of Ms. Hanson—they differ on one critical point: what date range of ballots were destroyed. Ms. Hanson testified that these ballots were cast from the period of October 15 through October 17. By contrast, Kay Gamble—the election official directly responsible for tracking totals on a daily basis—repeatedly testified that these accepted ballots that would have been processed on October 17 covered a different period—from October "14th, 15th, and 16th." Tx. 184:7 (K. Gamble); *see also* Tx. 187:21-25 (K. Gamble).[2]

Obviously, this differing universe[3] of affected ballots/voters belies any certainty about whose ballots were destroyed in this election—because if Kay Gamble is correct, and she is the official who directly tracked these issues, the identity of the missing voters is incomplete/partially incorrect.

Finally, there is the third theory: Lori Hensen's categorical denial that she was responsible for opening the envelopes in question, since "she was doing another activity at that time." Tx. 102:7-12 (J. Hanson). While Scott County Election Officials did not find Ms. Henson's version of events "to be credible", that credibility determination appears to be based primarily on the fact that Ms. Henson's story was inconsistent with that of other witnesses. Tx. 102:13-25;103:1-2. But of course, if Ms. Henson's version of events is correct—and there was no direct testimony that categorically disproves it—then the county's theory and timeline of events is obliterated if Ms. Henson was not the operative actor.

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[2] As noted here, Ms. Gamble made this point multiple times during her testimony including during direct examination by Contestee, where Ms. Gamble stated "yeah, 14 -- 14, 15, 16, and 17 wouldn't have been on that report." Tx. 173:22-23 (K. Gamble).

[3] There is also inconsistent testimony as to the number of validly cast absentee ballots in Precinct 10—giving further doubt to that universe of potential ballots. For example, Julie Hanson testified that of the 87 absentee ballots cast in that precinct, 37 were votes from health care facilities. Tx. 50:25-51:2 (J. Hanson). This left a universe of 50 ballots. Tx. 51:2 (J. Hanson). However, Contestee's counsel later repeatedly asks her about the "47 ballots". Tx. 92:1; 92:16-21 (J. Hanson), a figure that Contestee uses as factually correct in his Memorandum of Law. *See Contestee's Br.* at 7. Obviously, certainty as to this question is important in identifying which voters/ballots were lost.

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These are basic questions that remain outstanding in the midst of Scott County's "ongoing" investigation where technicians are still attempting to retrieve video footage of the events in question. Tx. 129:16-18 (M. Lehman); Exhibit 2 (Scott County's "investigation is not complete and remains ongoing. . ."). And while their additional information may eventually be pieced together that categorically resolves these issues—they remain outstanding at the present time; during this Court's tight timeframe for review.

Therefore, the only reasonable conclusion for this Court is to acknowledge the existence of these inconsistencies and unknown facts. To do otherwise, as Contestee suggests, would require this Court to insert itself into the ongoing investigation and to make factual conclusions that the County, itself, has not conclusively made.

II. Contestee Misstates the Relevant Legal Standard

Pursuant to Minnesota Stat. § 209.02, subd. 1, an election contest may be brought "over an irregularity in the conduct of an election or canvass of votes, over the question of who received the largest number of votes legally cast," or "on the grounds of deliberate, serious, and material violations of the Minnesota Election Law."

To meet this standard, all Contestant needs to prove is that the "carelessness or irresponsibility [of election officials] has been carried to such an extent as to affect the outcome of the election **or put the results in doubt**." *In re Contest of Election of Vetsch*, 71 N.W.2d 652, 658 (Minn. 1955) (emphasis added). Here, Director Hanson readily concedes that the official conduct here was "inappropriate, something that should not have happened", a "very large" error, and that it is "a big deal." TX. 59:12; 112:22 (J. Hanson). The standard for an election contest is more than met here.

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The Court should reject Contestee's alternative "gotcha" standard where contestants would be obliged to determine the contents of *missing and destroyed* ballots or lose their election contest. The obvious problem with such a rule would be that even in the reverse situation—where 30,000 ballots were destroyed and only 20 maintained—how would a contestant ever conclusively *prove* that the unknowable contents of the 30,000 ballots, despite their overwhelming number, would have changed the outcome of the election? It is an impossible and unworkable standard that this Court should reject.

III. Minnesota Law Does Not Permit Using the Voters' Testimonies as Substitutes for the Missing Ballots

Central to Contestee's attempts to summarily resolve the District 54A election, is Contestee's impermissible attempt to paper over the missing ballots via the testimony of certain voters at the Election Contest Hearing. *See, e.g*, Contestee's Br. at 9 ("Specifically, the record demonstrates that 20 ballots from Shakopee Precinct-10 were inadvertently discarded before they were counted,1 that the individuals identified by . . . Scott County as Voter 1 through Voter 20 cast the uncounted ballots, and that six of the twenty voters cast ballots for Representative Tabke and six others—called by Contestant—cast ballots for Aaron Paul.") (cleaned up).

First, as discussed in Section I, there are profound problems with the conclusion that "the individuals identified by . . . Scott County as Voter 1 through Voter 20 cast the uncounted ballots. . ." *Id*. While that may be the county's "best guess", that's not a sufficient basis to decide an election—especially where any error would result in those voters being impermissibly allowed to vote twice, with the uncounted voters still disenfranchised.

Even if this Court were willing to ignore the optics and separation of powers concerns attendant to so heavily inserting itself into this election's resolution, Contestee's proposal that the

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Court use the voter testimony as substitutes for ballots violates Minnesota law. *See Contestee's Br.* at 11 ("Six of the voters testified that they cast their ballots for Representative Tabke and six others testified that they cast their ballots for Aaron Paul. This is sufficient to put to rest any question regarding which candidate received the most votes in this election.").

The Court of Appeals squarely addressed this question in its 1986 decision in *Kearin v. Roach*, when deciding whether the contestant had shown enough "votes were cast by nonresidents . . .for the contestee to change the result." 381 N.W.2d 531 (Minn Ct. App. 1986). While the Court of Appeals considered certain types of circumstantial evidence that could be used, the Court held that "**for obvious reasons arising from the inviolable secrecy[4] of the ballot, direct evidence as to how contested votes were cast is not allowed** . . ." *Id*. at 533. Given that *Kearin* is a precedential decision, this Court is obliged to follow it here and not impermissibly use the voters' testimony.[5]

> As the Minnesota Supreme Court has previously explained:
>
> > where, as in this case, the supposed ballots were never in existence, and we must rely upon the subsequent declarations of the electors as to how they intended to and would have marked and cast their ballots, if they had voted, it would be an uncertain and dangerous experiment to attempt the task of ascertaining and giving effect to

[4] Indeed, this rule is consistent with Minnesota's emphasis on secrecy of the ballot. *See Bell v. Gannaway*, 227 N.W.2d 797, 802 (Minn. 1975) ("The preservation of the enfranchisement of qualified voters and of the secrecy of the ballot, the prevention of fraud, and the achievement of a reasonably prompt determination of the result of the election have been the vital considerations in the development of absentee voting legislation."); s*ee also*, Minn Admin. R. 8210.0300 (requiring absentee ballot be "ke[pt]. . . secret."); *Doepke v. King*, 156 N.W. 125, 125 (Minn. 1916) ("Where a person so far violates the secrecy of an election as to identify his ballot, by writing his name on it, the vote itself is illegal and fraudulent. An act of this kind is in violation of the law and should not be given validity for any purpose whatsoever); Minn. Stat. § 204C.22, Subd. 2 (limiting an inquiry to a voter's intent to "only" the "face of the ballot." Furthermore, the purpose of the statute is to protect voter anonymity. It renders ballots defective that contain identifying marks. *Id*.).

[5] Contestee deems it "somewhat confusin[g]" that Contestant called a handful of voters identified by the County as possibly being the missing 20. *Contestee*'s *Br.* at 12, fn. 4. Frankly, it is not "confusing" at all that Contestant would choose to call voters that participated in the flawed absentee balloting administered by the City of Shakopee. While for purposes of transparency and the reflection of any bias, Contestant asked the voters how they voted in the District 54A Election, Contestant's questions were largely aimed at the process of absentee voting in the City of Shakopee and the voters' views and their feelings on the uncertainty and maladministration of the election. At no point, has Contestant deemed them to be those that cast of the missing ballots or *ever suggested* that the testimony of those voters could be used as substitutes for ballots.

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> their intentions, as ballots actually cast and returned. *Uncertain, because it would be simply a matter of speculation; dangerous, because it would give to such electors the power of determining the result of an election, in a close contest.*

Pennington v. Hare, 62 N.W. 116, 117 (Minn. 1895) (emphasis added).[6]

Nor is Minnesota an outlier in prohibiting such voter testimony. *See, e.g.*, *McCavitt v. Registrars of Voters*, 434 N.E.2d 620, 623 (Mass. 1982) ("in the absence of evidence of fraud or intentional wrongdoing, a voter who has cast an absentee ballot in good faith may not be asked to reveal for whom he or she voted. Such a requirement burdens the fundamental right to vote and strikes at the heart of the American tradition of the secret ballot. If the outcome of an election depends on good faith absentee voters whose facially valid ballots must be rejected because of procedural mistakes, we believe that a new election is preferable to compelling those voters to disclose the candidate for whom they voted."); *Huggins v. Superior Court*, 788 P.2d 81, 83 (Ariz. 1990) ("Voter disclosure testimony, even where offered, is highly suspect. Courts have long recognized this weakness when contemplating testimony by legal voters whose attempted votes were erroneously unrecorded."); *Briscoe v. Between Consol. Sch. Dist.*, 156 S.E. 654, 656 (Ga. 1931) ("[I]t would . . . be dangerous to receive and rely upon the subsequent statement of the voters as to their intentions, after it is ascertained precisely what effect their votes would have upon the result."); *Young v. Deming*, 33 P. 818, 820 (Utah 1893) ("We know from common experience that those

[6] The Court went on to posit through significant fraud concerns under such circumstances:

> All that it would be necessary for them to do, in such a case, to decide the election, would be to declare that they intended to vote for a particular candidate. It would enable them to sell the office to the candidate offering the highest price for it, because they would not be called upon for their declaration until a contest arose, after the actual ballots had been counted, and the precise effect of their statement known. They could swear falsely as to their past intentions, without fear of punishment, for how would it be possible to disprove their statements as to their intentions with reference to a supposed act, if perchance they had acted?

Id. While such concerns may seem a bit extreme in the present case, the Supreme Court's admonition speaks to the dangers of establishing precedent whereby such testimony would be admitted in future cases.

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who do vote are usually unwilling that the character of their votes be made public, and that whenever there is an investigation as to the actual vote cast it is almost certain to bring about prevarication and uncertainty as to what the truth is; and while in this case before us no special reasons exist for casting reflections upon the truth of those who participated in the election, yet it is deemed unwise to lay down any rule by which the certainty and accuracy of an election may be jeopardized by the reliance upon any proof affecting such results that is not of the most clear and conclusive character."); *Kirby v. Wood*, 558 S.W.2d 180, 182 (Ky. Ct. App. 1977) (internal citation omitted) ("Kentucky law is well settled that voters will not be permitted to testify as for whom they voted. The rationale for this holding is that it protects the integrity of the secret ballot, as well as the whole electoral process. If a person were permitted to testify, the Court would be relying upon voluntary witnesses and could possibly be confronted with a one-sided distorted viewpoint.").

By contrast to the clear and controlling precedent on this issue, Contestee's brief is centered on the idea that this Court can use the testimony of the voters in the Election Contest hearing for the truth of how they voted. *See, e.g*, Contestee's Br. at 9. To support this idea, Contestee, in a footnote cites to two distinguishable cases where ineligible individuals who voted testified as to their fraudulent votes had their testimony used for purposes of apportionment. *See Contestee's Br.* at 11, fn. 2 (*citing Hanson v. Emmanuel*, 297 N.W. 749, 755 (Minn. 1941); *Ganske v. Indep. Sch. Dist*., 136 N.W.2d 405, 408 (Minn. 1965) (cleaned up)). Ignoring or being unaware of controlling precedent, Contestee then posits that "[i]t is likewise appropriate for this Court to consider voter testimony to determine for whom they voted on their legally cast ballots."). *Contestee's Br.* at 11, fn.2.

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But, precedent notwithstanding, there is an important reason the distinction between the *Kearin* line of cases, involving legitimate voters, and cases like *Hanson*, involving illegal ones. As explained by the New Mexico Supreme Court:

> [I]n the case of illegal voters[,] [i]t is universally recognized that the right to examine the voters in such a case is in affirmance and vindication of the essential principle of the elective system, that the will of the majority of the qualified voters shall determine the right to an elective office, and that the testimony of the voter, after it has been shown that he voted illegally, is competent, and should be received by the court or jury for what it is worth. The law protecting the secrecy of the ballot is intended to apply only to lawful voters, and does not ordinarily apply to or protect illegal voters, who can be required to testify as to how they voted at an election.

Kiehne v. Atwood, 604 P.2d 123, 127 (N.M. 1979); *see also Willis v. Crumbly*, 268 S.W.3d 288, 297 (Ark. 2007) (*citing Kiehne*) ("in election contests, where there is evidence of an illegal ballot, the person who illegally voted can be forced to testify as to whom they voted. . ."); *Duncan v. Willis*, 302 S.W.2d 627, 637 (Tex. 1957) ("When it is determined by the trier of facts on sufficient evidence that a ballot has been fraudulently marked by another or that a spurious ballot has been substituted for that of the voter, the rule is that the voter may state how he intended to vote. Such testimony while recognized as a potential source of danger, is nevertheless accepted as a matter of necessity to prevent greater evils that would surely result from its exclusion.").

Therefore, while Contestant remains firm that it is impossible to know with a sufficient degree of certainty as to the identity of the 20/21 individuals who cast the destroyed ballots, even if they were cast by the voters identified as Voters 1-20 by Scott County, it would be legally impermissible to do as Contestee suggests and use the voters' testimony for the truth of how they voted. And given that no admissible evidence—such as the circumstantial evidence referenced by the *Veit* case (cited by Contestee)—exists as to how these voters would have voted—the Court lacks any evidence to make a conclusive determination as to the result of the election.[7]

[7] As discussed above, Contestant disputes the idea that Voters 1-20 have been conclusively identified as having cast the missing ballots, as such, it would be inappropriate and premature for Contestant to have introduced circumstantial evidence as to how those individuals voted. *Compare Berg v. Veit*, 162 N.W. 522, 523 (Minn. 1917) (acknowledging distinction in election contest centered on illegal votes between cases where contestant can "show that enough of such votes were cast for the contestee to change the result" versus those where a contestant "is unable to show for whom the illegal votes were cast, and has established that fact to the satisfaction of the court."). Here, Contestant has satisfied his burden through showing that the operative ballots are missing and it is impossible to show for whom they were cast.

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IV. Contestee Misrepresents Contestant's Case Law on New Elections

Finally, Contestee devotes considerable effort to factually distinguishing the numerous recent cases where courts across the country ordered new elections in elections with material problems or unknowable outcomes. *See Contestee's Br*. at 15-18.

But as described at length in Contestant's Brief, "[w]hen the number of lost votes exceeds the margin of victory in a contested race, this type of failure thus often merits a judicial response. **Ordinarily, some form of new election will be the most appropriate solution for lost votes that could have determined the election**, despite the burdens of this remedy." Steven F. Huefner, Remedying Election Wrongs, 44 Harvard J. on Legis. 265, 299 (2007) (emphasis added).

That the current case's factual background—election officials having destroyed a significant of number of votes that "could have determined the election"—is uncommon does not render the mistake immaterial. *Id*. And the fact that Contestee can factually distinguish other cases where courts have ordered new elections, is not surprising given that the parties stipulated that "this type of election contest is a matter of first impression." Tr. 120:25-121:1 (Stipulation of Parties).

What is important—and why Contestant cited such a wide range of cases—is that new elections are commonly ordered when the results of an election are in dispute. *See, e.g.*, *Nickelson v. Whitehorn*, 375 So.3d 1132, 1140 (La. App. 2 Cir. 2023), *writ denied*, 2023-01645, 2023 La. LEXIS 2428 (La. Dec. 28, 2023) (affirming trial court order for new election in one-vote margin race where election administration irregularities were "sufficient to make it legally impossible to determine the result of the election."); *compare with Contestee's Br.* at 11, fn.2 (suggesting, in the alternative, using impermissible voter testimony to decide the election).

And indeed, even since Contestant's Brief was filed, it has been confirmed that a special election in the *Johnson* Election Contest will go ahead as ordered by the court in that case. *See*

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Office of Governor Tim Walz and Lieutenant Governor Peggy Flanagan, *Governor Walz Issues Writ of Special Election to Fill Vacancy in House District* 40B (Dec. 27, 2024), *available at* https://mn.gov/governor/newsroom/press-releases/?id=1055-662935.

CONCLUSION

Contestee's theory fails as a matter of law and fact. Elections require, and Minnesota voters deserve, certainty. Certainty based upon the fundamental notion that our elections are a true reflection of the will of the people. It is no small coincidence that the motto that hangs in the House chamber reads: "Vox Populorum Est Vox Dei." It is the people's voice that determines our elections and our government. When that process is corrupted, so too is the people's ability to control their government.

Contestee's resolution of this matter would result in rendering elections at the mercy of a "best guess" or "back math", while ignoring obvious errors with cataclysmic results; or worse yet, rendering the results subject to flawed statistical computations.[8] Heaping best guess upon best guess, conjecture upon conjecture, speculation on speculation will never equal the certainty that elections require.

A special election remains the appropriate remedy here.

[Signature page to follow]

[8] This theory, when taken to its logical conclusion, would result in there never being an election administration material irregularity again. A court could simply apply a formula based on other voter's choices and ascribe that to their disenfranchised neighbors.

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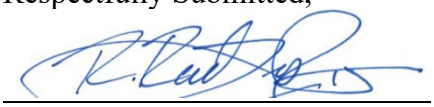
Dated: December 30, 2024

Respectfully Submitted,



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I declare under penalty of perjury that everything I have stated in this document is true and correct. Minn Stat. § 358.116

ACKNOWLEDGEMENT

Pursuant to Minn. Stat. § 549.211, the undersigned acknowledges that costs, disbursements, and reasonable attorney and witness fees may be awarded to the opposing party or parties for actions in bad faith; the assertion of a claim or a defense that is frivolous and that is costly to the other party; the assertion of an unfounded position solely to delay the ordinary course of the proceedings or to harass; or the commission of a fraud upon the Court.

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CERTIFICATE OF SERVICE FOR CONTESTANT'S FINDINGS OF FACT, CONCLUSION OF LAW, AND [PROPOSED] ORDER

I hereby certify that I have served Contestant's Findings of Fact, Conclusions of Law, and [Proposed] Order to all counsel of record via the court's electronic filing system this 30th day of December, 2024.

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I declare under penalty of perjury that everything I have stated in this document is true and correct. Minn Stat. § 358.116

Dated: December 30, 2024

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