

**AFFIDAVIT OF LYN HELLEGAARD**

STATE OF MONTANA                    )  
  : ss  
County of Missoula                    )

I, Lyn Hellegaard, having been duly sworn and upon my oath, state as follows:

1. I am over eighteen (18) years of age, and a resident of Missoula County, Montana. I am mentally sound and competent to swear to the matters set forth herein. The matters set forth in this Affidavit are based upon my own personal knowledge, unless otherwise stated.

2. On January 04, 2021, I led the Missoula County Election Integrity (MCEIP) Affirmation Envelope Count at the Missoula County Fairgrounds, Horticulture Building. The Affirmation Envelopes were already stacked two boxes tall on tables (placed vertically) in the center back of the building, between 10 rows of tables for 2 counters each (placed horizontally). Bradley Seaman and six Missoula County employees were present.

3. The twenty MCEIP counters included election judges, poll watchers, bank executives, and other volunteers, not election staff, instructed by Bradley and Quentin.

4. Quentin Rhoades and I met with Bradley Seaman from 9:00 a.m. to approximately 9:15 a.m. We discussed the process we would use to count the envelopes. Bradley supplied me with left over tally sheets from a prior election. The tally sheets had candidate names printed on them. The 20 volunteer counters assembled at 9:00 a.m., were given instructions between approximately 9:15-9:30 a.m. Bradley Seaman was present the entire time. I instructed the counters to use the County Elections tally sheets, using one sheet per box. They were told to ignore the candidate

names. There were two people counting each box. Bradley made no comment or objection to the instructions.

5. Bradley spoke to Quentin and me about room capacity due to COVID-19 protocols which only allowed 25 people to be in the building at a time. We discussed sending some of the MCEIP counters home or his staff. I requested he send his staff home. We then implemented the following process.

6. Ten tables were arranged around the room. Two volunteer counters were seated at each table. The four remaining Missoula County employees would bring a box of affirmation envelopes to a counting table, open the sealed box, observed our count, pacing throughout the room. The two volunteer counters at the table then used a fresh tally sheet for that box. There were two tally sheets for each box. When volunteer counters indicated they were done counting all the affirmation envelopes in a box, which were rubber banded in bundles of varying sizes, the volunteer counters placed the rubber band back on the packet, if it was removed.

7. The counting team members would write on the tally sheet, by either hash mark or number, how many envelopes were in each packet. The county election employee would take the box out of the room and another county election employee would bring a new sealed box of affirmation envelopes. I did not observe any county election employee re-sealing the boxes. After a box was completed, the counters set the two tally sheets for that box aside, procured a fresh sheet and started on the next box delivered by the County employee. For each box provided, under our process, two counters created two tally sheets for each box of envelopes.

8. Bradley Seaman sat on the west side of the building working on his computer for most of the count but would answer questions brought to him at the table he was working at or walk to the counting table with questions. At no point did he object to or comment upon the process.

9. At some point during the count, the counters were finding some envelopes didn't have a red line through the signature on the affirmation envelope. I asked Bradley Seaman the purpose of the red line through the signature. He stated it was the Missoula County Election's office process of indicating the signature had been checked. When asked about the missing lines, he stated it was just a clerical error of one of the clerks.

10. At that point I instructed the volunteer counters to keep track of missing red lines by writing "no signature" on their log sheet and logging them. I also instructed the counters to keep track of the number of envelopes they found without dates. I assured Bradley Seaman that the "no sig. or no signature" indicated on the sheets only meant the red line was not present. It did not indicate the envelope didn't have a signature. Still later in the count, a counter said she had found signatures from the same address were very suspect, looked like one person had signed them all with their left hand, or intentionally tried to write a "shaky" signature. I asked this counter to note that on the tally sheet for that box. I attempted to take a picture of two of the envelopes, Bradley Seaman and a county election employee came to my table and said "they had an agreement with Quentin that no pictures would be taken. But Bradley would supply Quentin Rhoades with a photocopy with the signature hidden. He did not, however, do so.

11. Bradley and I had a discussion about these issues. He instructed the counters to pull any envelopes they had concerns about, and we would set them aside for Quentin Rhoades, who had left the building after the instructions to the counters, at approximately 9:30 a.m.

12. We completed the process at around 1:30 p.m. At the end there were 60 tally sheets for the 30 boxes of ordinary envelopes we counted. Besides these, there were 3 additional tally sheets, completed by me, Melina Pyron and Renee Mitchell. All three sheets had a notation of "Special Box". Bradley Seaman specifically asked the three of us to count this "special box" as he indicated it contained envelopes that had problems and the elections office had tried to resolve. Each envelope had a sheet of paper attached indicating the issue and resolution, if any, and the number of envelopes in the bundle.

13. Upon completing the affirmation envelope count MCEIP counters turned in all of their signed log sheets to me; I placed a binder clip on them and placed them in a pouch with a Velcro closure. I then took them home ran an adding machine tape, reflecting the total count of envelope packets, and taped said adding machine tape to each tally sheet. I then scanned each tally sheet into a PDF document. I placed the binder clip back on the tally sheets, placed them in the pouch and delivered them to the custody of Quentin's law office.

14. Other than answering specific questions, election staff, who were carefully observing the volunteer counters, did not comment about the process MCEIP counters were using. At the end of the count Bradley Seaman congratulated the citizen volunteers and remarked at what a good job they had done. He also suggested the

group become election judges. It was not until after Bradley Seaman met with Quentin regarding the discrepancy did Bradley suggest that MCEIP volunteers hadn't done the job correctly.

15. In February 2021, members of MCEIP supplied PDF copies of the 63 tally sheets to various news media outlets, including the *Missoulian*. These PDF copies confirm that there were only 63 tally sheets created by MCEIP volunteers on January 4, 2021, and only 31 boxes were produced by the County for our count.

16. On March 28, 2022, I attended the Missoula County Central Committee affirmation envelope count held at the election's office warehouse on Russell Street from 8:30 a.m. until 12 Noon. There were 33 numbered boxes of affirmation envelopes available for eight Missoula County election staff to count. There were eight observers from the Missoula County Republican Central Committee who sat six feet away from the counting tables. They were too far from the County counters to decipher signatures or dates on the envelopes.

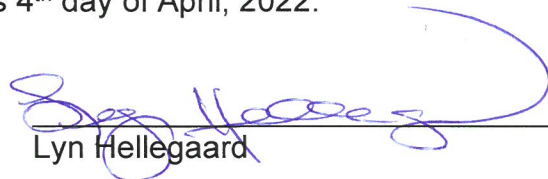
17. On March 31, 2022. I went to Quentin Rhoades' law office at 10:00 a.m. with the purpose of counting the tally sheets from the January 4, 2021, MCEIP affirmation envelope count. My purpose was to double check if Bradley Seaman of the Missoula County Elections Office had provided the January 4, 2021, affirmation envelope count with 33 boxes of affirmation envelopes, as was given to the Missoula County Republicans on March 28, 2022. I counted 63 tally sheets, which, again, correlated to 31 boxes during our January 4, 2021, count. Two volunteer counters created two tally sheets for each box they counted.

18. I counted the original tally sheets twice and came up with a total of 63 sheets. 60 sheets from the "regular" envelope boxes and 3 tally sheets from the "special box." I requested the receptionist at Rhoades & Erickson, PLLC, count the tally sheets to confirm my counts were accurate. She confirmed that she had counted a total of 63 tally sheets. This would mean there were 31 boxes of affirmation envelopes provided at the January 4, 2021, count.

19. In sum, on January 4, 2021, the County Election Office provided the MCEIP with two boxes of affirmation envelopes **fewer** than were counted by the County in March of 2022. The source of the additional box of envelopes produced and counted this March is not known.

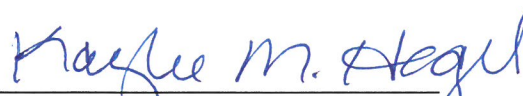
FURTHER AFFIANT SAYETH NOT.

DATED this 4<sup>th</sup> day of April, 2022.

  
Lyn Hellegaard

STATE OF MONTANA     )  
                                      : ss  
County of Missoula     )

This instrument was acknowledged before me on the 4<sup>th</sup> day of April, 2022, by  
Lyn Hellegaard.

  
Notary Public for the State of Montana

