

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

COUNCIL ON AMERICAN-
ISLAMIC RELATIONS –
MINNESOTA AND LEAGUE OF
WOMEN VOTERS OF MINNESOTA,

File No. 20-cv-02195 (NEB-BRT)

Plaintiffs,

**DECLARATION OF CASEY JOE
CARL**

vs.

ATLAS AEGIS LLC, ANTHONY
CAUDLE, JOHN DOES #1-10,

Defendants.

I, Casey Joe Carl, declare the following under penalty of perjury, pursuant to 28 U.S.C. §1746:

1. I am the City Clerk for the City of Minneapolis. In that capacity I oversee the administration and conduct of all federal, state, and local elections in the City of Minneapolis. Minneapolis Elections and Voter Services (“EVS”) is a division within my department and it is the principal division of the City of Minneapolis that conducts elections.

2. I was first appointed City Clerk in 2010 and I have served in that position continuously since then. Since that time, I have administered 25 elections,

including the regular presidential, gubernatorial, and municipal election cycles for the years between 2010 and 2020, as well as eleven special elections for the people of Minneapolis in that same time period.

3. My position and the positions all of the EVS staff are non-partisan. EVS makes every effort to ensure that all eligible voters in the City of Minneapolis are able to vote and have their votes counted without bias or political intervention in a safe and fair manner. We take our obligations seriously as fairness and accuracy of elections and their results are the very foundation of American Democracy.

4. All EVS employees, including staff, partisan election judges and unpaid volunteers are subject to a code of conduct that ensures they maintain the integrity of the election process and voter confidence. A true and correct copy of that Code of Conduct is attached as Exhibit 1.

5. One of the most important factors in ensuring that all eligible voters can vote is public confidence in the physical safety of voting itself. To that end, I and EVS take physical security and safety seriously for all of our EVS locations including voting locations, logistical hubs, and EVS headquarters.

6. Among the challenges to ensuring physical safety of voters is the ongoing COVID-19 pandemic. The City has taken unprecedented measures to

boost its capacity to send out, receive, and process mail-in ballots and to support early in-person voting at multiple locations.

7. Another challenge that is emerging is voter fears created by the activities of organizations like Atlas Aegis LLC, and others, who have indicated that armed private groups have taken an interest in providing what they claim is “security” for Minnesota’s voting locations. EVS has a security plan for its elections and does not want and rejects the help and coordination that is allegedly being offered by Defendants.

8. Since the news stories about Atlas Aegis LLC came out the City has received numerous complaints and expressions of concern about armed private groups threatening election security in Minneapolis.

- a. I am aware that Minneapolis 311 has received multiple calls from residents distressed about security and harassment at polling places.
- b. Physical security of our election sites, and of our staff, has become a regular topic of concern in EVS worksites. Since the news story about Atlas Aegis LLC first was reported, those discussions have increased.

- c. Safety concerns after reporting about Atlas Aegis LLC's plans have already caused two election judges to withdraw from planned service for this year's election.
- d. After news stories came out about Atlas Aegis LLC, representatives of at least five facilities selected to serve as polling place sites have expressed concern about the potential for unrest and also expressed concerns about safety and security of the polling places.
- e. Our entire City Council and Mayor have requested several briefings about the status of plans and preparations for polling place safety and security in response to reports about armed private groups intending to secure Minnesota's voting locations.
- f. The Minneapolis State Legislative Delegation has requested a briefing from me to address concerns they have, and concerns they have received from their constituents, about the City's plans and preparations to ensure polling place safety and security because of these published reports.
- g. There have been an unusually high number of media outlets contacting the City seeking clarification or comment about the plans and preparations to address polling place safety and security

in response to the published reports about Atlas Aegis, including the Minneapolis Star Tribune, the New York Times, Los Angeles Times, Bloomberg News, and Business Insider.

9. Even if the injunction is granted, damage has already been done by Defendants and others who seek to disrupt the election. The City has already lost the service of two election judges due to safety concerns. Just the discussion of armed private groups interfering with the physical security of election sites is distressing and, in my opinion, likely to suppress voters from choosing to participate in the coming election because of fears for personal safety and the security of polling places. I want every voter to have a chance to have his or her vote counted; the suppression that causes even one voter to choose not to vote is not acceptable.

I declare and state under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: October 23, 2020

s/CaseyJoeCarl.
CASEY JOE CARL
City Clerk, City of Minneapolis
350 S. 5th St. Room 304
Minneapolis, MN 55415

Effective September 11, 2019

**City of Minneapolis
Elections and Voter Services
Code of Conduct**

The core principle of election administration is to provide a fair and accurate election in a neutral or nonpartisan manner. To maintain the integrity of the election process and voter confidence, individuals who administer or are involved in any aspect of this process must adhere to high standards of behavior.

Workplace: Defined as City property such as City Hall and the Election Facility and any premises while representing the City or performing City functions.

Working hours: Defined as hours compensated or volunteered discharging City functions.

Standards of Conduct

In the workplace and during working hours, you must remain neutral and nonpartisan in action and word.

1. Any conversation political in nature is prohibited. Topics include but are not limited to candidates, campaigns, questions on a ballot, opinions of elected officials at all levels of government in any jurisdiction such as city, county, school board, state and federal level, political issues and current or pending legislation relative to elections policy or a political party position.
2. May not wear clothing or buttons political in nature or with a political message.
3. May not display any political media in the workplace
4. May not use City resources or equipment to express opinions or discuss topics described above in #1. This also includes electronic communications on City computers and email.

Activities outside of working hours and workplace

1. Paid Employment: City's Code of Ethics Chapter 15.60
15.60 Outside Employment. (a) A local official or employee shall not accept employment or enter into a contract that:
 - (1) Interferes with the proper discharge of his or her duty;
2. Volunteer
 It is your constitutional right to express your personal opinion on political issues and candidates. Any political activity outside of the workplace should be seriously considered. Such activities have the potential to create a public perception related to the City of Minneapolis and Elections and Voter Services' ability to maintain neutrality and uphold the integrity of the elections. Such public perceptions could affect voter confidence and prevent the Elections Office from carrying out its duties efficiently.

Election Oath

Before assuming duties, all paid employees and volunteers for the City of Minneapolis Elections and Voter Services will sign an oath as described in Minnesota Statute 204B.24 ELECTION JUDGES; OATH¹:

I, *(Name)* solemnly swear (or affirm) that I will perform the duties of election judge *and/or the City of Minneapolis Elections and Voter Services' functions* according to law and the best of my ability and will diligently endeavor to prevent fraud, deceit, and abuse in conducting this election. I will perform my duties in a fair and impartial manner and not attempt to create an advantage for my party or for any candidate.

¹ Italicized words added by the City of Minneapolis Elections and Voter Services.

**Additional Tips for
Elections & Voter Services Employees**

As a public servant for the City, you are held to a high standard of conduct. Your actions shape the public's opinion of our department, and the City of Minneapolis. A few helpful tips to consider when in the workplace:

- 1) Treat all people with respect. Listen courteously and attentively to both residents and coworkers.
- 2) Be prompt in answering requests for service.
- 3) Give clear, patient explanations that avoid confusion.
- 4) Do not argue with an irate resident. Stay calm and call for assistance from your supervisor.
- 5) Maintain a neat, well-kept work area.
- 6) Don't engage in actions that could be perceived as damaging or unfavorable towards the city.