

IN THE COURT OF COMMON PLEAS, CHESTER COUNTY, PENNSYLVANIA
CIVIL DIVISION

Filed and Attested by
PROTHONOTARY
15 Sep 2022 11:04 AM
M. SCHIAVONI



JAMES C. ROMINE, DARYL :
CAMPBELL, SANDRA LYNN :
BOWMAN, AND WILLIAM REID :
BORTON : NO.

Plaintiffs

v.

CHESTER COUNTY BOARD OF :
ELECTIONS, KAREN BARSOUM, in :
her official capacity, MARIAN :
MOSKOWITZ, in her official capacity, :
JOSH MAXWELL, in his official, and :
MICHELLE KICHLINE, in her official :

Defendants

COMPLAINT IN EQUITY AND MANDAMUS

Plaintiffs file this complaint for a special and preliminary injunction and for a writ of mandamus and aver as follows:

Parties

1. Plaintiff, James C. Romine, is a resident of Chester County and a registered voter. Romine intends to vote in the upcoming November 8, 2022, general election.

2. Plaintiff, Daryl Campbell, is a resident of Chester County and a registered voter. Campbell intends to vote in the upcoming November 8, 2022, general election.

3. Plaintiff, Sandra Lynn Bowman, is a resident of Chester County and a registered voter. Bowman intends to vote in the upcoming November 8, 2022, general election.

4. Plaintiff, William Reid Borton, is a resident of Chester County and a registered voter. Borton intends to vote in the upcoming November 8, 2022, general election.

5. Defendant, Chester County Board of Elections is a county board of elections organized and existing under 25 P.S. § 2641. The Board is responsible for conducting primary and general elections in Chester County. Among other duties, the Board has a statutory duty to select and equip polling places, 25 P.S. § 2642(a), make rules, regulations, and instructions consistent with the Pennsylvania election code for the conducting of elections, 25 P.S. § 2642(f), to investigate fraud, irregularities, and violations of the election code and report the same to the District Attorney, 25 P.S. § 2642(i), and to receive, canvass, and compute ballots and to certify election results to the Secretary of the Commonwealth, 25 P.S. § 2642(k).

6. Defendant, Karen Barsoum, is the director of the Chester County Board of Elections and she is sued in her official capacity.

7. Defendant, Marian Moskowitz, is a member of the Chester County Board of Elections and is sued in her official capacity.

8. Defendant, Josh Maxwell, is a member of the Chester County Board of Elections and is sued in his official capacity.

9. Defendant, Michelle Kichline, is a member of the Chester County Board of Elections and is sued in her official capacity.

Background

10. The Pennsylvania constitution requires that “[e]lections shall be free and equal; and no power, civil or military, shall at any time interfere to prevent the free exercise of the right of suffrage.” Pa. Const. art. I, § 5; *Pennsylvania Democratic Party v. Boockvar*, 238 A.3d 345, 356 (Pa. 2020).

11. “The broad text of this specific provision ‘mandates clearly and unambiguously, and in the broadest possible terms, that all elections conducted in this Commonwealth must be ‘free and equal.’” *Boockvar*, 238 A.2d at 356 (quoting *League of Women Voters v. Commonwealth*, 645 Pa. 1, 178 A.3d 737, 804 (2018)

12. “Stated another way, this clause was ‘specifically intended to equalize the power of voters in our Commonwealth's election process[.]’” *Id.* (quoting *League of Women Voters*, 178 A.3d at 812.

13. The purpose of the Election Code is “[t]o obtain freedom of choice, a fair election and an honest election return[.]” *Id.*

14. The Pennsylvania Election Code requires that mailed and absentee ballots must be returned either by mail or in person by the person to whom the ballot belongs, i.e. one person, one ballot.

15. Regarding the return of a mailed ballot, 25 P.S. § 3150.16(a) states “[s]uch envelope shall then be securely sealed and the elector shall send same by mail,

postage prepaid, except where franked, or deliver it in person to said county board of election.”

16. Regarding the return of an absentee ballot, 25 P.S. § 3146.6(a) states the same: “Such envelope shall then be securely sealed and the elector shall send same by mail, postage prepaid, except where franked, or deliver it in person to said county board of election.”

17. Mailed or absentee ballots returned by someone other than the voter are void, invalid, and should not be counted. *In re Canvass of Absentee Ballots of November 4, 2003 Gen. Election*, 577 Pa. 231, 843 A.2d 1223 (2004) (“[the] “in person” delivery requirement is mandatory, and that the absentee ballots of non-disabled persons who had their ballots delivered in contravention of this mandatory provision are void.”); *Donald J. Trump for President, Inc. v. Boockvar*, 2020 WL 5407748, at *9 (W.D. Pa. Sept. 8, 2020) (“everyone now agrees that the election code forbids third-party ballot delivery.”); *Pierce v. Allegheny Cty. Bd. of Elections*, 324 F.Supp.2d 684, 691 (W.D. Pa. 2003) (entering preliminary injunction voiding and barring the counting of 937 absentee ballots delivered by third parties.)

18. The mission statement of the Chester County Board of Elections is to “conduct fair, accurate, and impartial elections.”

<https://www.chesco.org/1868/Mission-Goals> (last visited September 13, 2022)

19. The Chester County Board of Elections authorizes the use of ballot drop boxes.

20. The Board of Election understands what the Election Code requires and that it prohibits third-party delivery of mailed or absentee to the drop boxes.

21. Indeed, the Board of Elections affixes to its drop boxes that the following statement:

!!PLEASE READ!!

You must only return **your own ballot**.

You are **prohibited** from delivering or returning any else's ballot, even if that person is your spouse, parent, child, grandparent, other relative, neighbor or friend.

If a voter has a disability or is voting by emergency absentee ballot, the voter may have someone deliver their ballot, **only if both parties have signed an official written authorization**.

Counterfeiting, forging, tampering with, or destroying ballots is a second-degree misdemeanor pursuant to sections 1816 and 1817 of the Pennsylvania Election Code (25 P.S. §§ 3516 and 3517).

Notify the **CHESTER COUNTY** election office immediately in the event that this receptacle is full, not functioning, or is damaged in any fashion.

Chester County Voter Services
ccelectionofficials@chesco.org
(610) 344-6410

(emphasis original).

22. In the May 2022 primary election, the Board of Elections authorized 13 drop boxes.

23. Upon information and belief, the Board of Elections intends to utilize 13 drop boxes in the 2022 general elections.

24. In the 2022 primary, the Board of Elections had voter services staff members at 11 of the 13 drop boxes to monitor the drop boxes and, to among other

things, assure that the drop boxes were used in compliance with the Election Code, including, assuring that a person was only delivering his or her own ballot to the drop box.

25. Moreover, those 11 drop boxes were only accessible 9 a.m. – 6 p.m. Monday through Friday and 10:00 a.m. – 2 p.m. on Saturday and Sunday.

26. However, 2 of the drop boxes were accessible 24 hours per day.

27. But those drop boxes, unlike the other 11, were not physically staffed in person and monitored by voter services staff members.

28. Rather, activity at those drop boxes was recorded with security cameras.

29. On May 17, 2022, plaintiff, Campbell, made a right to know request to the Board of Elections seeking copies of the video recordings of those security cameras.

30. Pursuant to that right to know request, the Board of Elections produced copies of those videos.

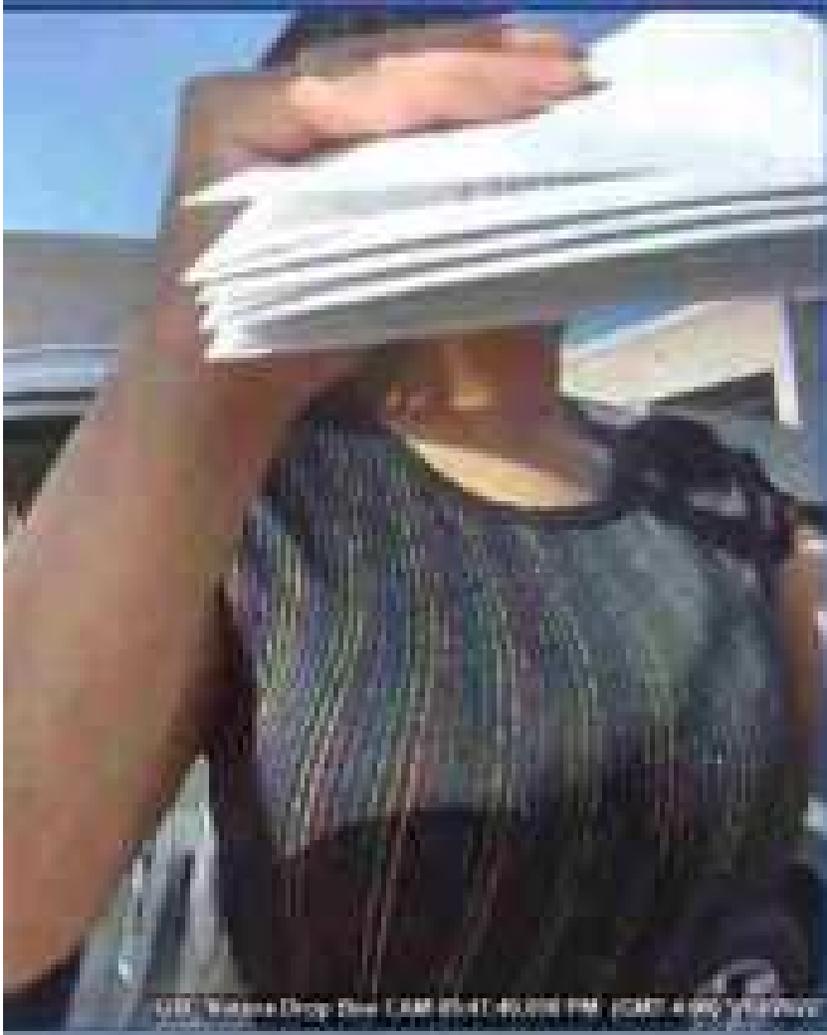
31. Those videos showed that over 300 individuals deposited void and invalid ballots at the drop box that was not physically monitored located at 601 Westtown Road, West Chester.

32. Those videos showed that over 300 individuals ignored the plain and unambiguous instructions of the Board of Election that (a) “you must only return your own ballot” and (b) “you are prohibited from delivering or returning anyone else’s ballot, even if that person is your spouse, parent, child, grandparent, other relative, neighbor, or friend.”

33. In numerous instances individuals delivered more than 2 ballots.

34. Examples of individuals delivering more than 2 ballots are depicted in the screen shots from the video of the drop box at 601 Westtown Road appear below:





35. The remaining still images of individuals depositing more than 1 ballot – including the numerous cases of individuals depositing more than 2 ballots - taken from the videos obtained through the right to know request are attached to this Complaint. True and correct copies of all images are attached at Exhibit 1. (Where an individual’s face was clearly seen in the still image an effort has been made to redact that individual’s face. But plaintiffs maintain unredacted copies and will make unredacted copies available to the Court if required.)

36. This means that at least 300 invalid and void ballots were deposited into just one drop box, which were then canvassed and counted.

37. A review of the security camera footage of the other drop box that was not physically monitored in person has not been completed but it is fair to assume that a similar number of void and invalid ballots were deposited at that location as well.

38. To underscore the significance of that number of votes, consider that the Pennsylvania Republican primary for United States Senate was decided by less than 900 votes.

39. Accordingly, these void and invalid ballots have the potential to impact the results of an election.

40. Upon information and belief, the Board of Election intends to utilize the drop boxes in the same manner as it did for the 2022 primary election for the upcoming 2022 general election.

41. That is, it intends to have 11 of the 13 drop boxes physically monitored, in person, by voter services staff member and only available between 10:00 a.m. and 6:00 p.m, Monday through Friday, and 10:00 a.m. and 2:00 p.m on Saturday and Sunday. But, as in the primary, 2 of the drop boxes will have *no* in person monitoring and will be available 24 hours per day.

42. Surely, like in the primary, individuals will delivery ballots that do not belong to them.

43. Moreover, the general election is likely to see a greater number of people delivering ballots that do not belong them.

44. Accordingly, plaintiffs seek injunctive relief and mandamus to compel defendants to have *all* drop boxes (not only 11 of 13) used by Chester County in the upcoming general election physically monitored, in person, to assure that an individual only deposits one ballot *belonging only to that individual* into the drop box.

CAUSES OF ACTION

COUNT I Injunctive Relief

45. Plaintiffs incorporate the previous paragraphs by reference.

46. A special and preliminary injunction is necessary to prevent the Chester County Board of Elections from receiving void and invalid ballots that are delivered by third parties and then commingling those ballots with validly cast ballots.

47. The five elements for the issuance of a preliminary injunction are (1) the injunction is necessary to prevent immediate and irreparable harm, which cannot be compensated by damages; (2) greater injury would result by refusing it than by granting it; (3) an injunction will restore the parties to the status quo as it existed immediately before the alleged wrongful conduct; (4) the alleged wrong is manifest, and the injunction is reasonably suited to abate it; and (5) the plaintiff's right to relief is clear. *Kierski v. Twp. of Robinson*, 810 A.2d 196, 198 (Pa.Cmwlth. 2002).

48. Each of these five elements exists here.

49. First, plaintiffs will suffer irreparable harm in that the void or invalid ballots will dilute their validly cast ballots— and the validly cast ballots of other

voters— thereby impinging on their fundamental right to vote under the United States Constitution and their right to a free and fair election under the Pennsylvania Constitution.

50. As in *Pierce v. Allegheny Cty. Bd. of Elections*, 324 F.Supp.2d 684, 691 (W.D. Pa. 2003), injunctive relief is necessary to preclude the commingling of ballots delivered by third parties and “if relief is not granted, the hand-delivered ballots would be rendered unidentifiable and any practical opportunity for the ballots to be challenged would be eliminated.”

51. Plaintiffs will also suffer irreparable harm because the Chester County Board of Elections will be conducting an election in contravention of the Pennsylvania election code. *Shaeffer v. City of Lancaster*, 754 A.2d 719, 723 (Pa.Cmwlt. 2000) (“Statutory violations are sufficiently injurious to constitute irreparable harm.”)

52. Second, greater injury will result if the injunction is not entered than if it is granted.

53. If the injunction is not entered plaintiffs’ fundamental right to vote will be lost because their votes will be cancelled by invalid votes delivered by third parties and the election will not be free or fair because invalid and void votes will be counted.

54. Conversely, there will be no harm to the Chester County Board of Elections.

55. Indeed, the requested relief seeks only to compel defendants to do what they are already doing at 11 of 13 drop boxes.

56. Defendants can continue to use drop boxes provided they institute adequate procedures at all 13 drop boxes (not just 11 of 13) to assure that only the voter delivers an absentee or mailed ballot to the drop box, such as placing the drop boxes inside and open only during normal business hours where the delivery of the ballot can be verified.

57. Third, the injunction will maintain the status quo because it will assure that the drop boxes do not receive invalid ballots.

58. Fourth, the requested injunction is limited to abate the harm.

59. Indeed, the requested preliminary injunction would not prohibit the use of ballot drop boxes. It only requests that defendants be required to use the 2 unmanned drop boxes in the same manner that it uses the other 11 drop boxes, to assure that the ballot is delivered to the drop box only by the person to whom it belongs, and to operate the drop boxes in a manner otherwise consistent with the Election Code.

60. Fifth, plaintiffs' right to relief is clear.

COUNT II
Action in Mandamus
Pa. R. Civ. P. 1091

61. Plaintiffs incorporate the previous paragraphs by reference.

62. Defendants have a public duty to count and canvass votes according to the Pennsylvania election code and to carry out those mandatory duties under the election code.

63. Defendants have a public duty to make sure that mailed and absentee ballots delivered by third parties are not counted or commingled with validly cast ballots.

64. Plaintiffs have an interest in assuring that Defendants only count validly cast ballots and that void ballots are not commingled with valid ballots because invalid and void ballots will cancel out their validly cast ballots.

65. Also, once invalid and void ballots are commingled plaintiffs— and any other interested citizens— can no longer challenge the ballots that were delivered by third parties.

66. Plaintiffs lack an adequate remedy at law.

Demand for Relief

WHEREFORE, Plaintiffs, Daryl Campbell, James C. Romine, William Reid Borton, and Sandra Lynn Bowman, respectfully request that this Court enter judgment in their favor and against Defendants and award the following relief:

1. Enjoining Defendants and anyone acting through, with, or on behalf of them, from using drop boxes to receive absentee or mailed ballots unless they are physically monitored in-person to assure that the person delivering the ballot is only delivering his or her own ballot, unless the person is an authorized designated agent of a disabled voter with the proper affidavit signed by the voter and verified by the election board.

2. Enjoining Defendants and anyone acting through, with, or on behalf of them, from accepting, counting, or canvassing any mailed or absentee ballot that was

delivered by a person other than the voter himself or herself, except for ballots delivered by an authorized designated agent of a disabled voter;

3. Compelling Defendants to fulfill their statutory duties to assure that void and invalid ballots are not commingled with valid ballots and not counted in the November 8, 2022 general election and all elections thereafter through appropriate monitoring of the drop boxes and delivery of mail in or absentee ballots; and

4. Entering any other appropriate relief.

Respectfully submitted,

Dated: September 15, 2022

/s/ Walter S. Zimolong
Walter S. Zimolong III, Esquire
James J. Fitzpatrick III, Esquire
Zimolong, LLC
Attorney I.D. 89151
wally@zimolonglaw.com
PO Box 552
Villanova, PA 19085-0552
Tele: 215-665-0842

/s/ Nicholas R. Barry
(*pro hac vice pending*)
America First Legal Foundation
Tennessee Bar No. 031963
nicholas.barry@aflegal.org
611 Pennsylvania Ave SE #231
Washington, DC 20003

VERIFICATION

I, James C. Rozina, verify that that the facts contained in the foregoing are true and correct based upon my knowledge, information, and belief. However, while the facts are true and correct based upon my knowledge, information, and belief, the words contained in the foregoing are those of counsel and not mine. I understand that statements herein are made subject to the penalties set forth in 18 Pa. C.S.A. §4004 relating to unsworn fabrication to authorities.

A handwritten signature in cursive script that reads "James C. Rozina". The signature is written in dark ink and is positioned above a horizontal line.

VERIFICATION

I, Daryl Campbell, verify that that the facts contained in the foregoing are true and correct based upon my knowledge, information, and belief. However, while the facts are true and correct based upon my knowledge, information, and belief, the words contained in the foregoing are those of counsel and not mine. I understand that statements herein are made subject to the penalties set forth in 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

Daryl Campbell
Daryl Campbell (Sep 14, 2022 18:30 EDT)

VERIFICATION

I, William Reid Horton, verify that that the facts contained in the foregoing are true and correct based upon my knowledge, information, and belief. However, while the facts are true and correct based upon my knowledge, information, and belief, the words contained in the foregoing are those of counsel and not mine. I understand that statements herein are made subject to the penalties set forth in 18 Pa. C.S.A. §4054 relating to unsworn falsification to authorities.



VERIFICATION

I, Sandra Lynn Bowman, verify that that the facts contained in the foregoing are true and correct based upon my knowledge, information, and belief. However, while the facts are true and correct based upon my knowledge, information, and belief, the words contained in the foregoing are those of counsel and not mine. I understand that statements herein are made subject to the penalties set forth in 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

Sandra Lynn Bowman
Sandra Lynn Bowman (Sep 15, 2022 09:00 EDT)



2022-07093-IR

CCC - Vehicle Camp - Box - CAM 02-14-47 167 AM (GMT-8:00) 07/09/22



2022-07093-IR

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GSC Vehicle Drop Box CAM 05/10/21 8:19 AM LIGHT 0 00000000



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SAC, Veterans Group, Room 1-AM, 10100 Alameda Ave, Denver, Colorado



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[Redacted]

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GSC - Motion Drop Box - L&M St. 29-51 257 PM - 2022-07-09 5:30:22



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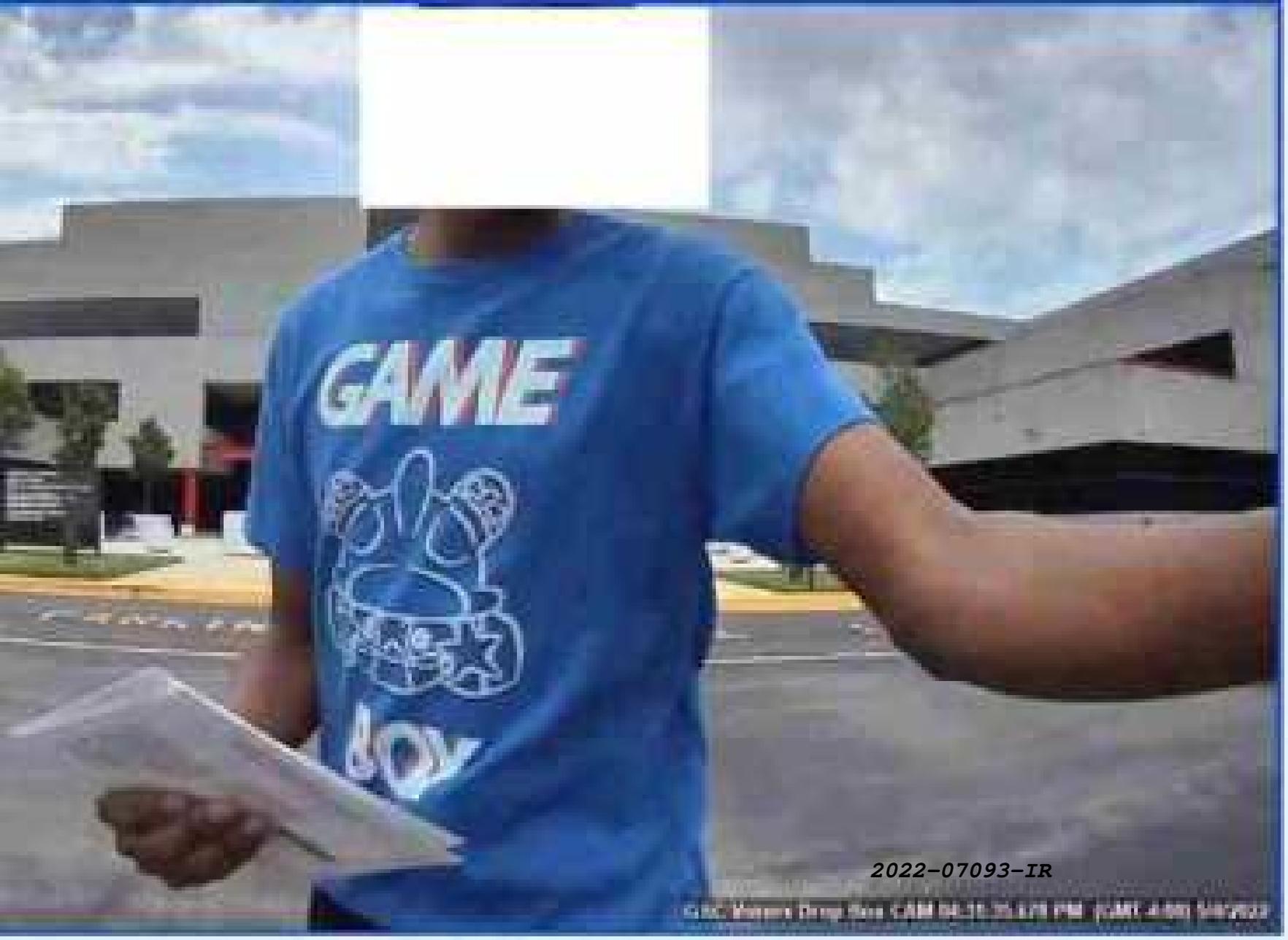
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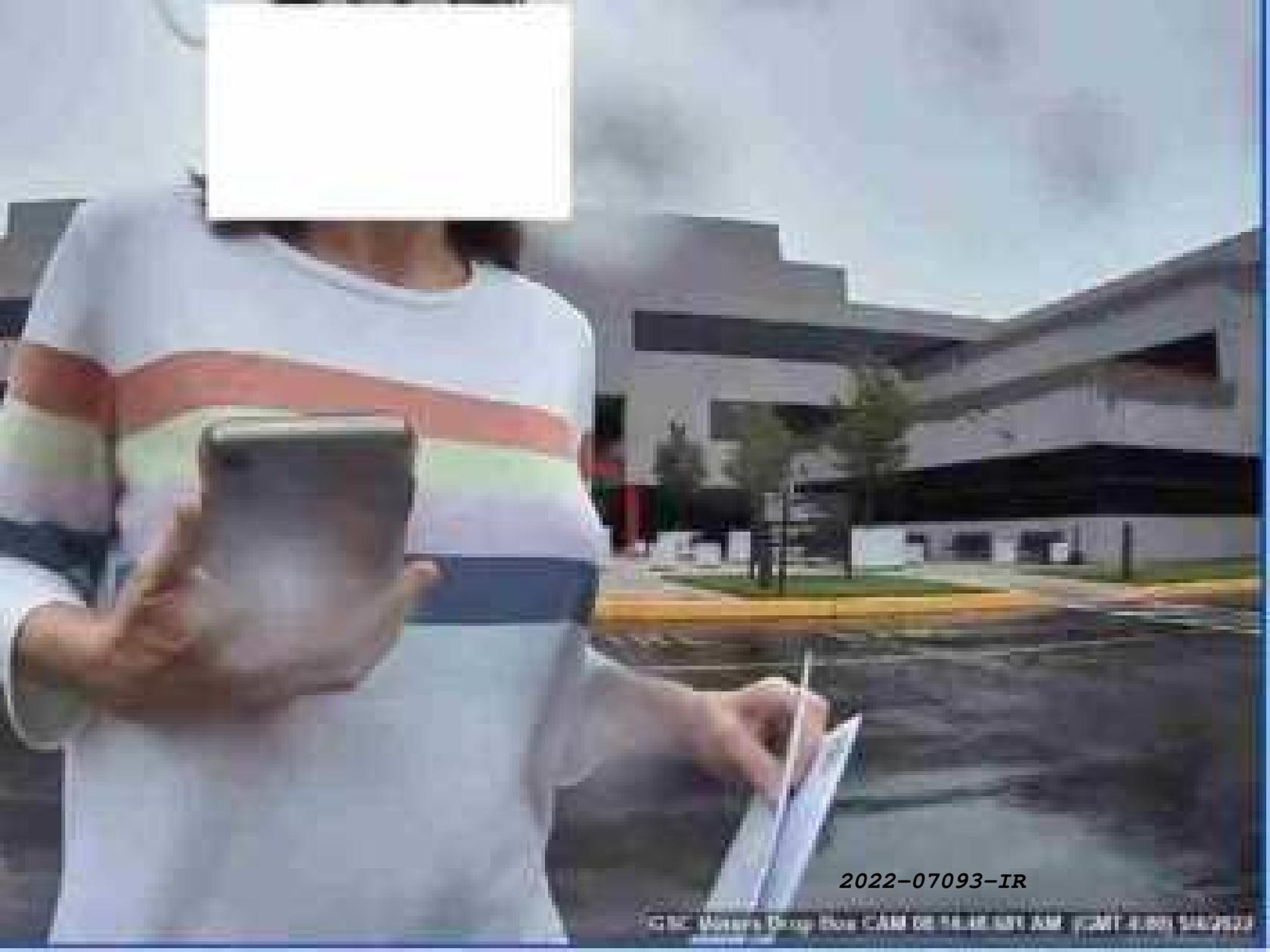


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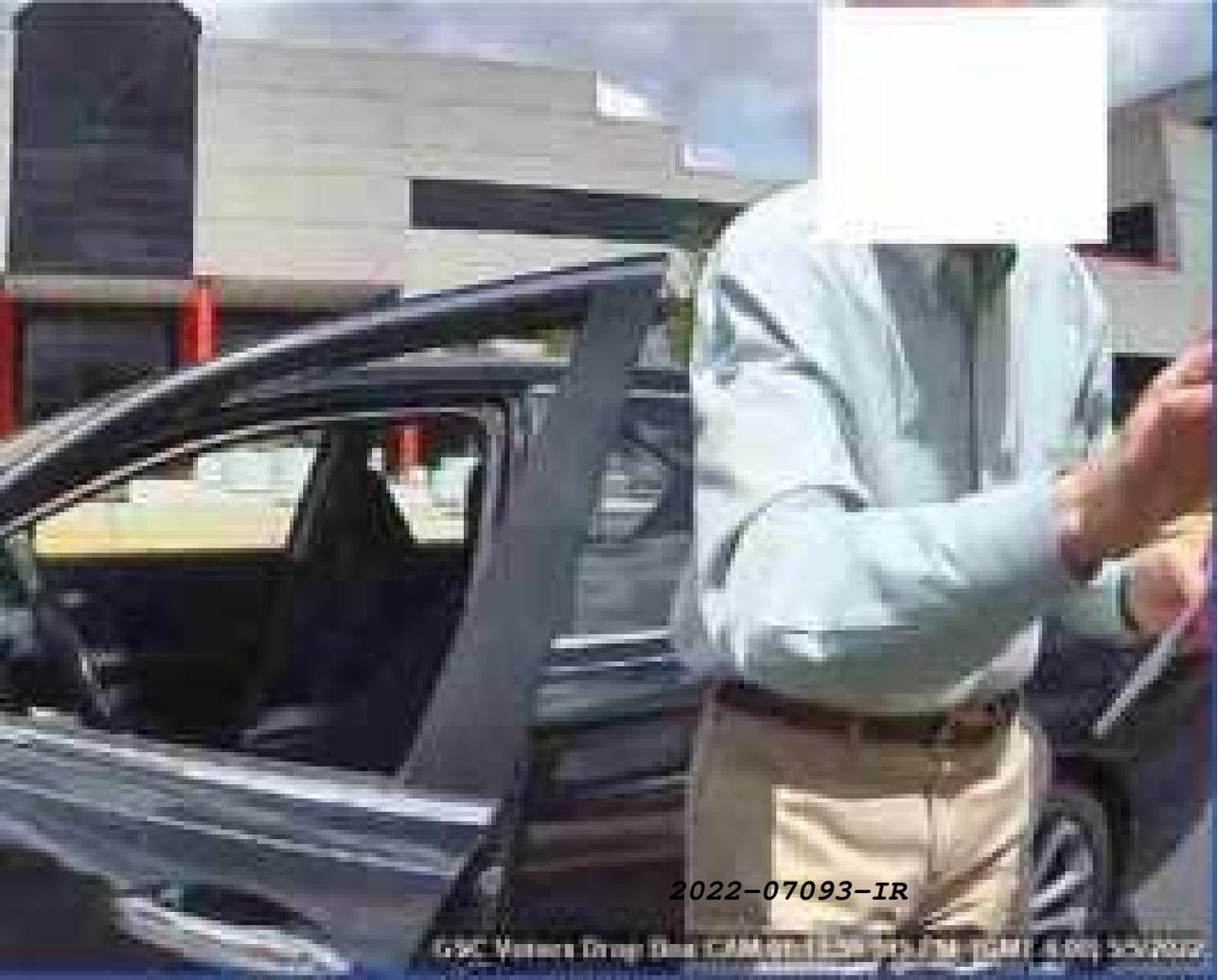
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2500 Main Street, San Francisco, CA 94103-1000 (415) 398-6000



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ESC Vehicle Group Data CRM 01-04-22 11:51 AM (PART 1-00) 5/5/2022



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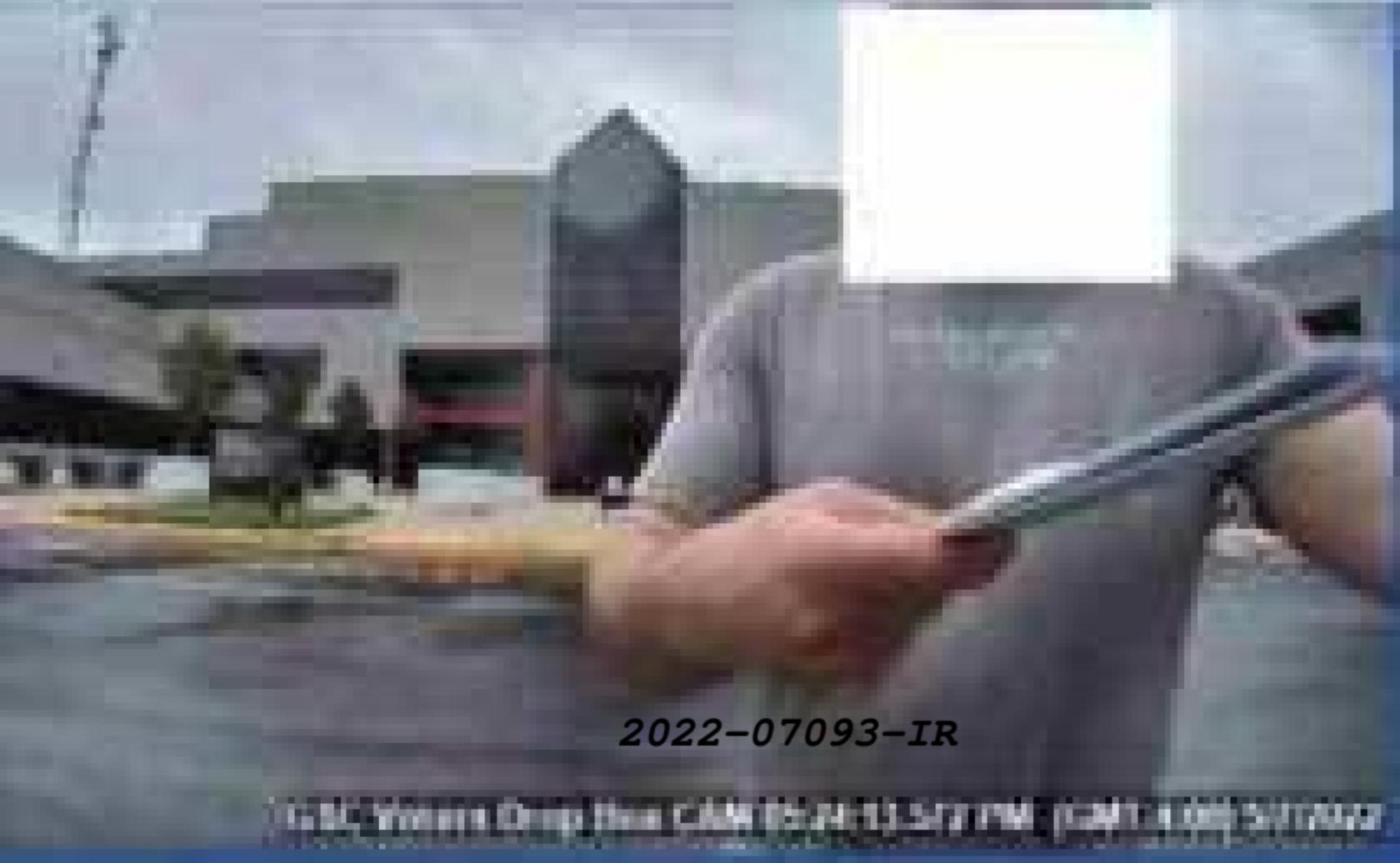
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U.S. District Court, District of Columbia, Case No. 22-cv-01000, Document 1-1, Filed 07/20/22



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WEST CHESTER

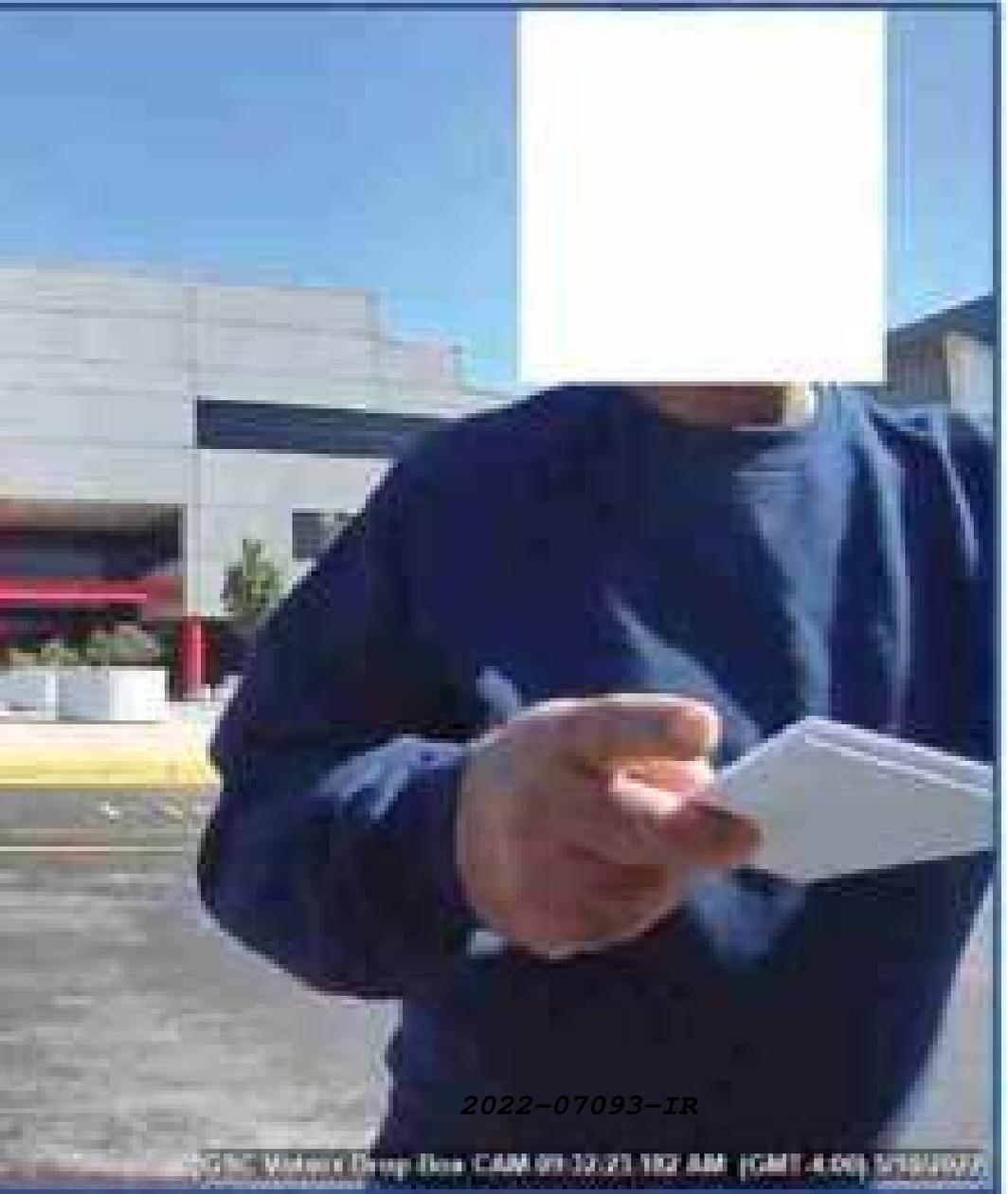
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WEST CHESTER COUNTY GOVERNMENT
100 MARKET STREET, WEST CHESTER, OHIO 43081
TEL: 614.393.3000 FAX: 614.393.3001



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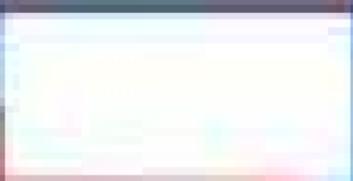


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SECURITY CAMERA FOOTAGE FROM 07/09/2022 AT 10:50 AM



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2025 RELEASE UNDER E.O. 14176



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2022-07093-IR

1500 W. UNIVERSITY AVENUE, SUITE 1000, DENVER, CO 80202-1700



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CSI - Western District - AM 11-11-2022 11:24 AM 2-AMT-4000 5/18/2022



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© 2022 Motorola (Inc) This CAM by H.15441.1M (CAM 4.50) 7/10/2022



2022-07093-IR

Walter's Drive Time CRM (2022-07-09 11:41 AM) 4000 50000000



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C:\MSD\Volare\Temp\Scan\CAM 04-18-50-4 PM PM (CAM) 4-18-2022



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GM: Motors Group Photo CAM 06-15-2022 08:00:00 AM (CONT.) 0.000 00000000



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U.S. Customs and Border Protection, 1600 International Drive, Fort Lauderdale, FL 33309

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1-31 Motion Using This CAM FROM 11:00 AM UNTIL 11:59:59 AM



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GMC Vehicle Group Data CAM 11:35:54L358 AM 104M 4.000 3/11/2022



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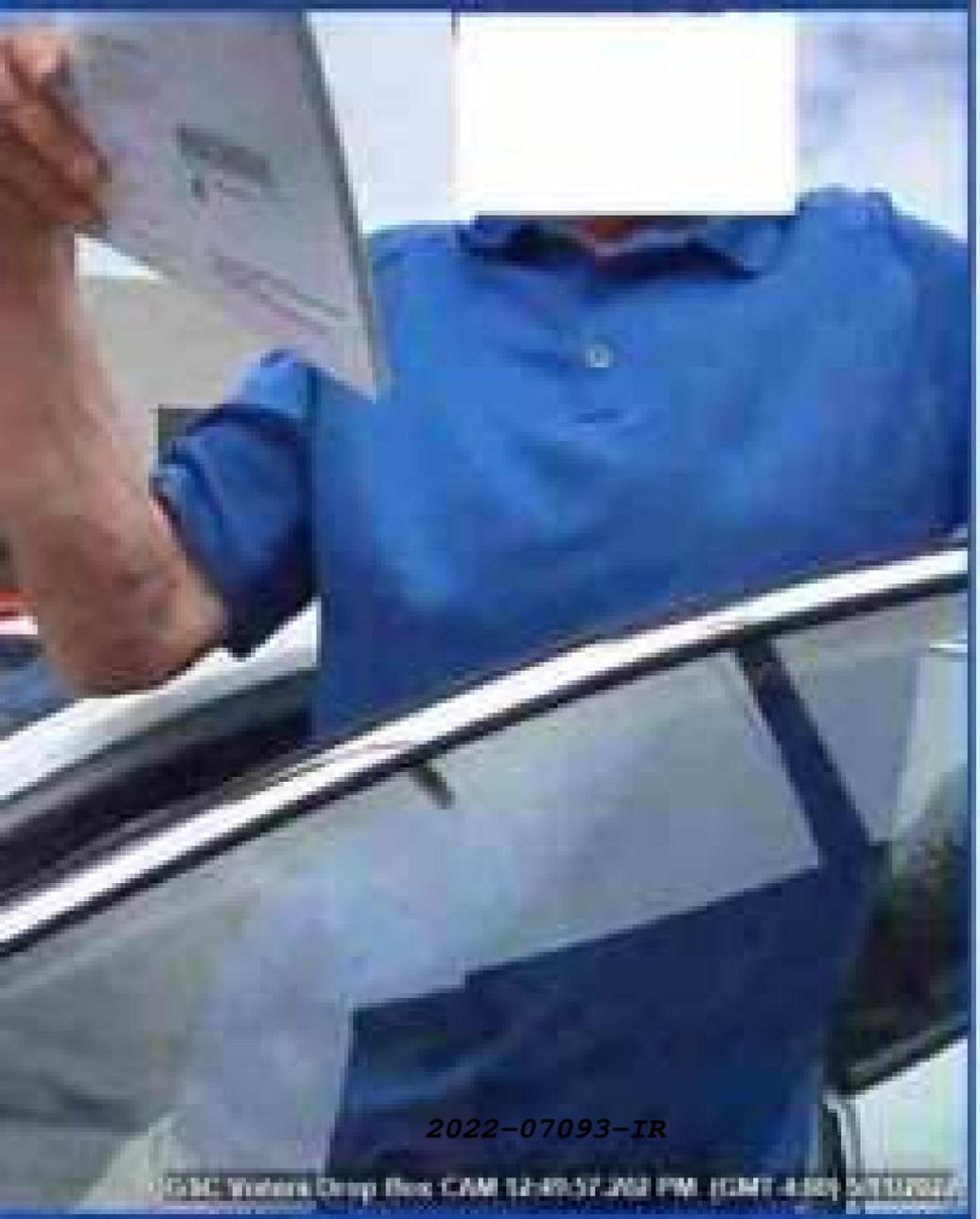
ENC. Vehicle Drop Box - 1000 11th St - 10:00 AM - 10:00 AM - 10:00 AM - 10:00 AM



2022-07093-IR

634-0001-1234

1234-5678-9012



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4:00 Motion (Type: Still) LAM DC 78.23.313 PM [Date] 4:00 10/15/2022

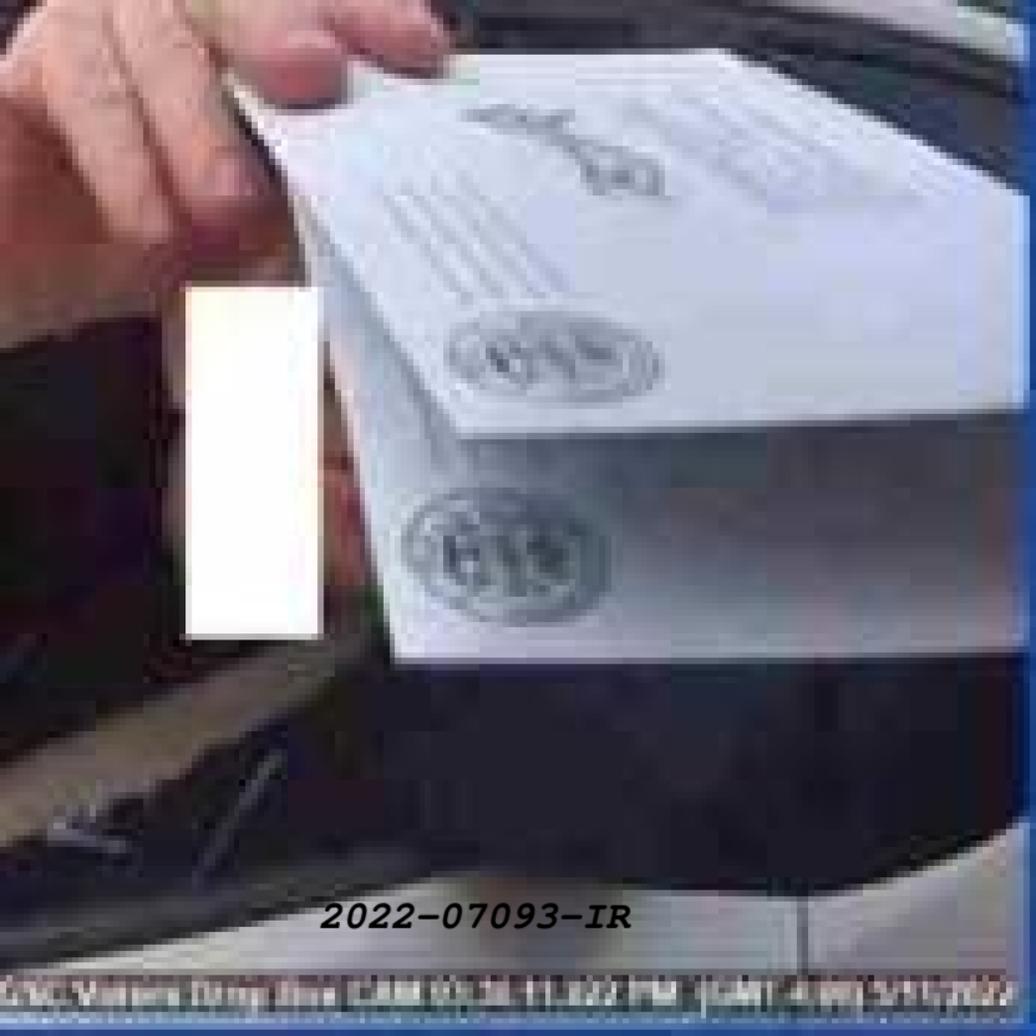


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GSC Visitors Drop Box CAM 02/08/21 3:15 PM (GMT-8:00) 5/15/2022



2022-07093-IR



2022-07093-IR



2022-07093-IR

ESM, Yoverin Drop Truck CAM 04 00 37.501 PM (DATE: 4/00) 0411/2022

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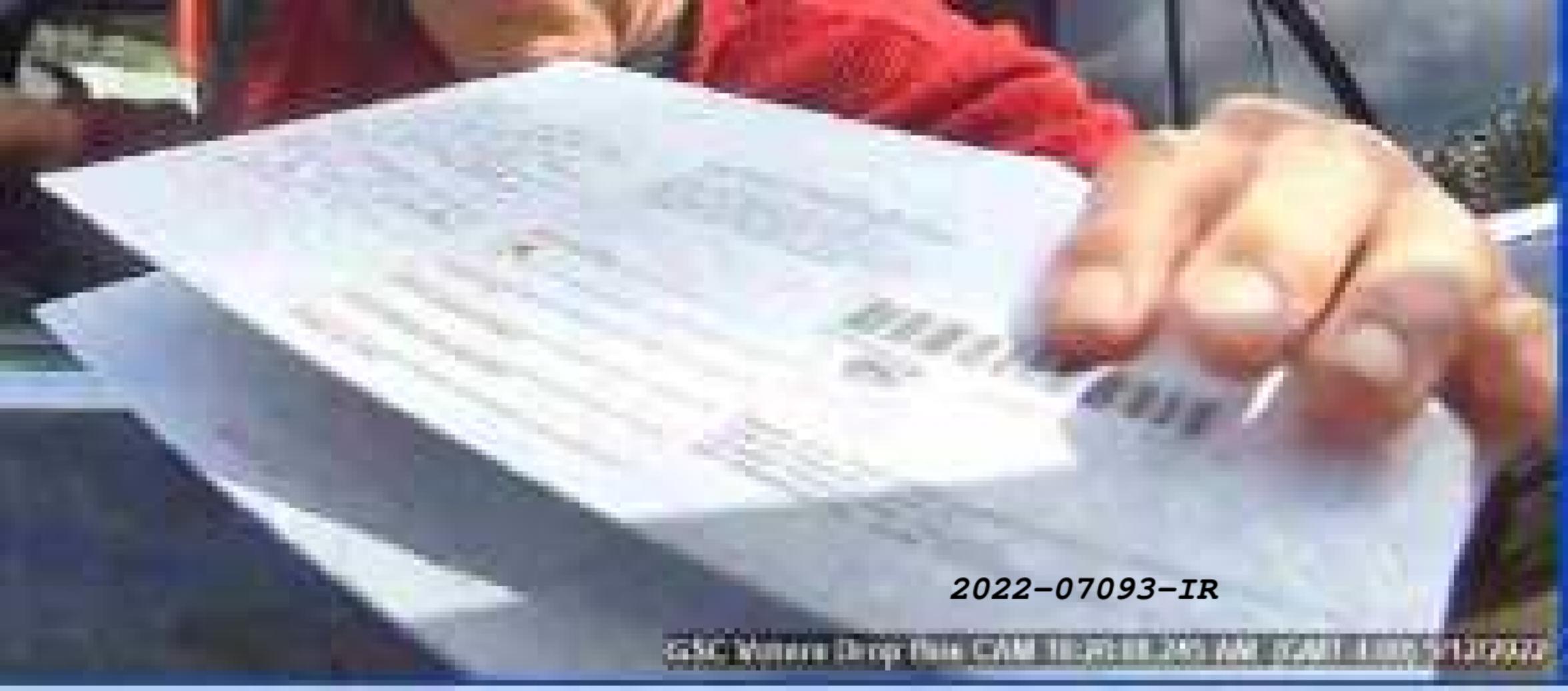
2022-07093-IR

2022-07-09 10:00:00 AM

2022-07093-IR

ESL - Special Drop Box - CAM 05/23 11:56 AM - CONT-4 05/23/2022

2022-07093-IR



2022-07093-IR



2022-07093-IR

ESL: Maria Flop Boal (AM) 10:44:37 AM 0-01 8180 5120000



2022-07093-IR



2022-07093-IR

0505 Video Downloaded From IP: 204.12.253.196 on 07/12/2022

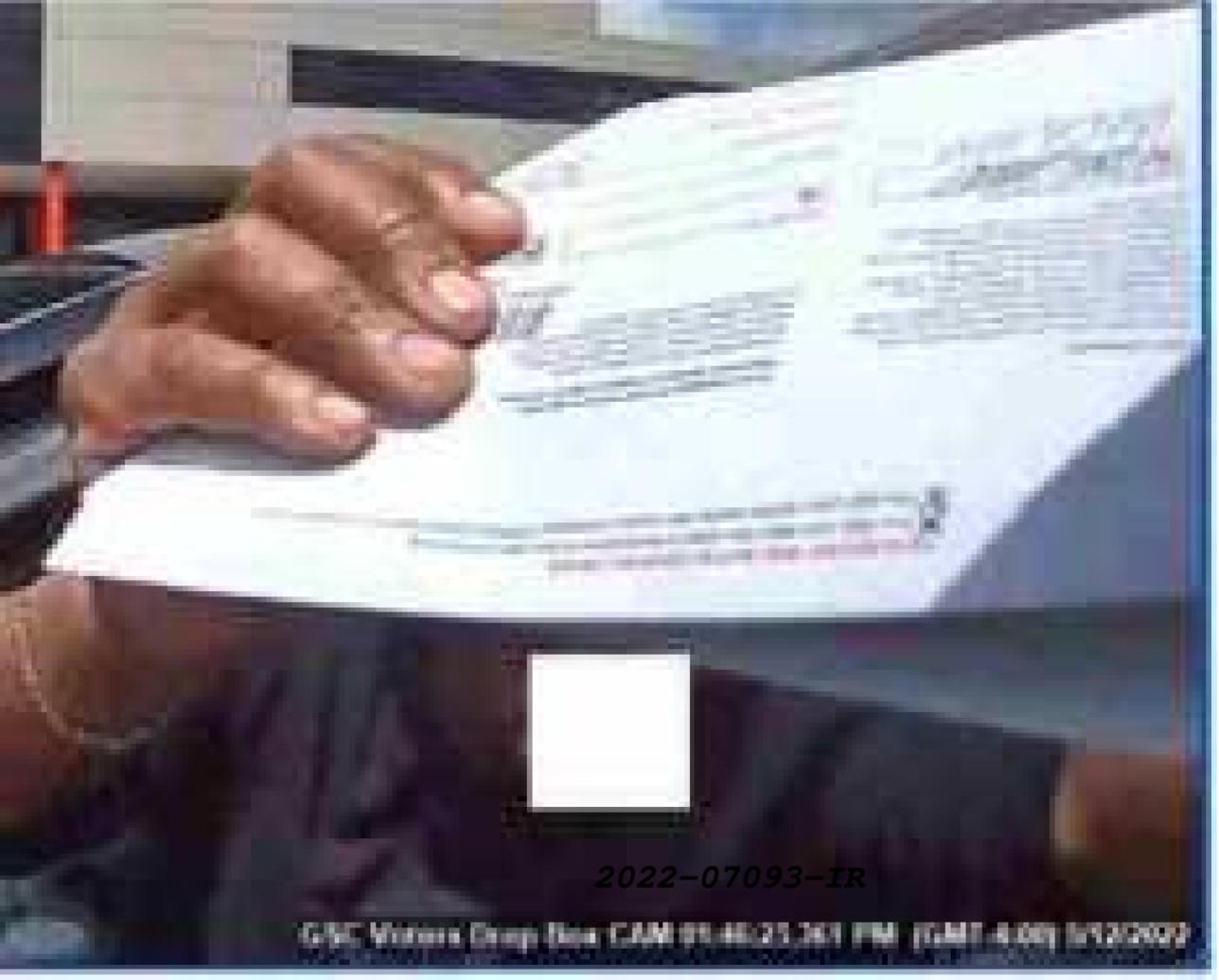


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Cam 13-20 13:57:19



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2022-07093-IR



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GSC Weara Drop Box CAM 05:47:48.078 PM GMT-7 07/15/2022



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GSC Veterans Group (ms) CAM 08/22/21 11 AM (GMT-4) 08/23/2022



2022-07093-IR



2022-07093-IR

GSC Vehicle Drop Box CAM 07/14/22 11:32 AM (CAM 4) 00 01 03832

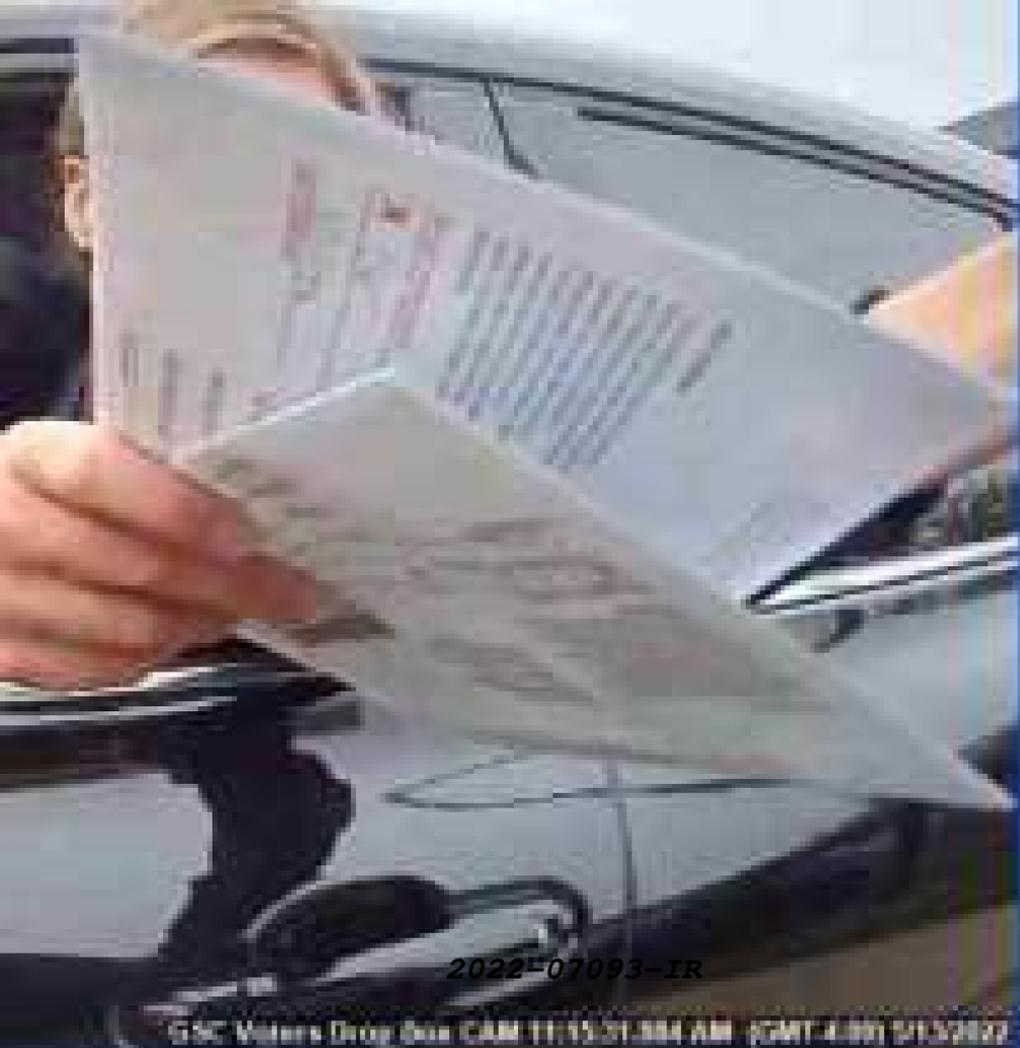
A close-up photograph showing a person's hand holding a small, dark object near the front grille of a dark-colored car. The grille has a prominent horizontal chrome strip. The background is out of focus, showing what appears to be a building entrance.

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6500 Valley Drive, Suite 1000, CAM 10/27/2021 11:41 AM CAM1-4-001 5/13/2022



2022-07093-IR



2022-07093-IR

GSC Waters Drop Bus CAM 11:15:31 AM (GMT-4:00) 2/13/22



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2022-07093-IR

2022-07093-IR

2022-07093-IR

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2022-07093-IR

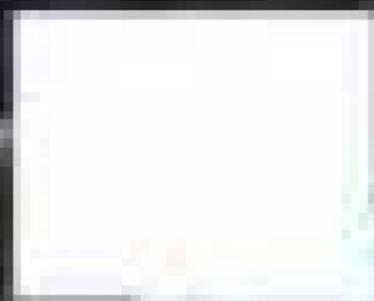


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2022-07093-IR



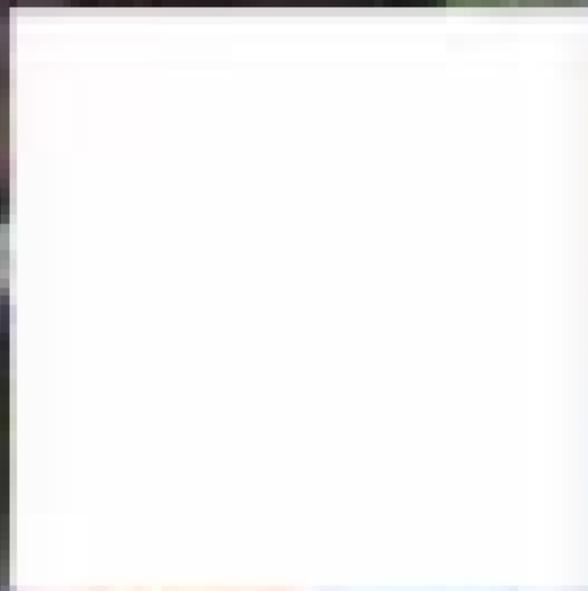
2022-07093-IR

GSC Witness Drop Box CAM 03-12-24 07:15 PM PMT 4 08-5-11-2022

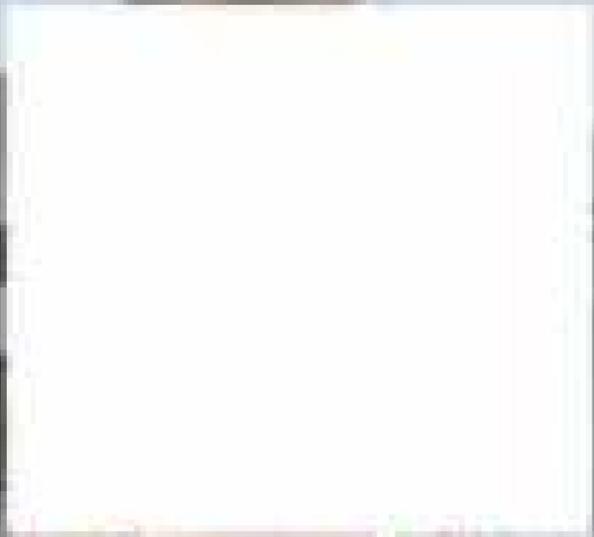


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GMC, Buick, Opel, Isuzu, Cadillac, Chevrolet, GMC, Buick, Opel, Isuzu, AWD, 4WD, 6-Speed, 5-14, 1500cc

2022-07093-IR

055 - Motion Group 0001 - AM 10:52:10.177 AM - PMT - 4001 11/16/2022

2022-07093-IR

CSC Medical Group (New) CAM 11 08 12 PM AM PLANT 4 001 57643032



USC Marine Drop Box CAM 01 26 12 02 PM (GMT-050) 3180222

2022-07093-IR

2022-07093-IR

2022-07093-IR

1551 - Working Under This T-AMM in 2022 and 2023 from 10/01/2022 to 09/30/2023



2022-07093-IR

5700 Western Drive, Parkville, MO 64116-8961 | 816-221-5500 | FAX: 816-221-5501



2022-07093-IR

Small white label with illegible text.

2022-07093-IR



2022-07093-IR

A person wearing a blue and white checkered shirt is holding a large, rolled-up document or blueprint. The document is white and appears to be a set of plans or a certificate. The person's hands are visible, gripping the roll. The background is slightly blurred, showing what might be a desk or a table.

2022-07093-IR

G-SC Victoria Drive (Box) E-AM 04 16 34 051 7M (GMT-4:00) 075402622



2022-07093-IR



2022-07093-IR

2022-07093-IR

GSC Visitors Drop Box CAM 05-16-2022 AM 10:01:40 07/16/2022



2022-07093-IR

CNC Video Drop Box CAM 11 07 2022 11:00 AM (GMT-4) 00000000

2022-07093-IR

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2022-07093-IR

IGN: Wellness Drop Box CAM 11:55:56 2022 AM 10411 4014 11/15/2022



2022-07093-IR

U.S. Military Drop Box (MIL) Call 1-800-435-8811 (M-F, MT, 4-8pm) 4/15/2022

2022-07093-IR



2022-07093-IR

A close-up photograph showing a person's hand holding a long, thin, cylindrical metal rod. The rod is held horizontally and extends from the left side of the frame towards the right. The background is a dark, solid blue color. The lighting highlights the metallic texture and the sharp edges of the rod.

2022-07093-IR

U.S. WORKERS DESIGN LINE COMM OF AM FOR INT PRA PLANT & MFG SUPPLY



2022-07093-IR



2022-07093-IR

2022-07093-IR



2022-07093-IR

2022-07093-IR

U.S. Women's Drug Abuse Call Center 573 PM GMT 4/20/2022

A close-up photograph of a person's hand holding a small, white, rectangular card. The card features a green logo, which appears to be a stylized letter 'E' or a similar symbol. The background is a dark, textured surface, possibly a book cover or a folder. The lighting is bright, highlighting the card and the hand.

2022-07093-IR



2022-07093-IR

2022-07093-IR

GSC Viewer Drop Box Case 0020-22-0000 PM COURT 4-00 5/15/2022

2022-07093-IR



2022-07093-TR

CCC Camera Drop Box CAM 01 10 21 08:17PM 10/20/2022 4:09 PM 10/20/2022

A person is holding a large sheet of paper, possibly a map or a technical drawing, which is tilted. The paper has some faint markings or text on it. The background is dark and out of focus.

2022-07093-IR



2022-07093-IR



2022-07093-IR

CAM: Vehicle Drop Box CAM 01-38-00-444 PMS [CAM-4-00] 20220709