Wally Zimolong, Esq.
Admitted in PA & NJ
Wally@ZimolongLaw.com

October 26, 2022

Via Email
Colleen Frens, Esquire
Deputy Solicitor
County of Chester Solicitor's Office
313 W. Market Street, Suite 6702
West Chester, PA 19380

Re: Demand for Investigation

Dear Ms. Ferns:

Video footage obtained from the Chester County drop box located at 601 Westtown Road in the May 2022 primary revealed an individual completing two ballots and then placing those ballots into the drop box. That video can be viewed here:

 $\frac{\text{https://www.dropbox.com/s/798oxtq2z95vlps/man\%20appears\%20to\%20be\%2}{0 filling\%20 out\%20 two\%20 ballots\%20}{\%20 places\%20 two\%20 ballots\%20 in\%20 box\%20\%281\%29.mp4?dl=0}$ 

Under 25 P.S. § 3517, it is a second-degree misdemeanor for an individual to complete more than one ballot or a ballot that does not belong to that person. Under 25 P.S. 2642(i), the Chester Count Board of Elections is required to investigate election fraud and violations of the Election Code and to report all suspicious circumstances to the Chester County District Attorney.

At the hearing on October 17, 2022, Attorney Hoffman suggested that the individual shown in this video violating the law was referred to the District Attorney. However, because this video shows conduct different from simply depositing more than one ballot (also illegal) we are requesting confirmation that you have referred this matter to the District Attorney. If you have not, then we demand that the Chester County Board of Elections investigate the election fraud depicted in the video and immediately refer that matter to the Chester County District Attorney.



Wally Zimolong, Esq.
Admitted in PA & NJ
Wally@ZimolongLaw.com

Respectfully,

Wally Zimolong, Esquire

cc: Robert Wiygul, Esquire Bonnie M. Hoffman, Esquire Faith Mattox Baldini, Esquire