

IN THE CIRCUIT COURT OF THE
15TH JUDICIAL CIRCUIT IN AND FOR
PALM BEACH COUNTY, FLORIDA

GENERAL CIVIL DIVISION

CASE NO.: 502021CA006615XXXXMB

JAN TYLER,

Petitioner,

vs.

WENDY S. LINK, in her official
capacity as Supervisor of Elections
for Palm Beach County

Respondent.

_____/

AMENDED COMPLAINT FOR A WRIT OF MANDAMUS¹

Petitioner, Jan Tyler, through counsel, the Public Interest Legal Foundation petitions the Court for an immediate hearing and the entry of a Writ of Mandamus directing the Respondent Palm Beach County Supervisor of Elections Wendy S. Link to perform her official ministerial duty and return all remaining funds Respondent received from Center for Technology and Civil Life (CTCL) a private non-governmental organization incorporated in the State of Illinois and return same to CTCL in compliance with Section 97.0291 of Florida Statutes.

¹ At 11:33 AM EST an email was sent to Petitioner's counsel from Ashley Houlihan on behalf of the Respondent. This email arrived while Petitioner's counsel was uploading the mandamus documents for filing, which was received by the Court at 11:41:09 AM EST. Respondent's letter is attached as Exhibit E.

Jurisdiction and Nature of Relief Requested

1. This is a complaint for an alternative writ of mandamus under Florida Rule of Civil Procedure 1.630:

Under Florida Rule of Civil Procedure 1.630(b), a petition for writ of mandamus must contain the facts on which the plaintiff relies for relief, a request for the relief sought, and, if desired, argument in support of the petition with citations of authority. If the complaint shows a *prima facie* case for relief, a trial court *must* issue an alternative writ of mandamus, and once an alternative writ has issued, the burden is on the respondent to come forth with facts upon which it refused to perform its legal duty.

Chandler v. City of Greenacres, 140 So. 3d 1080, 1083 (Fla. 4th DCA 2014) (emphasis added) (internal quotations and citations omitted).

Parties

2. Petitioner, Jan Tyler, is a resident of the State of Florida.

3. Respondent is the Palm Beach County Supervisor of Elections, an elected constitutional officer of Palm Beach County. “Florida has 67 counties. Each county has a Supervisor of Elections. Each Supervisor conducts elections within his or her county.” *Contact Your County Supervisor of Elections*, Florida Division of Elections, <https://dos.myflorida.com/elections/contacts/supervisor-of-elections/>.

Respondent’s ministerial duties include the administration of Palm Beach County’s elections.

Argument

4. In *Radford v. Brock*, 914 So. 2d 1066 (Fla. 2d DCA 2006), the Second District Court of Appeal of Florida outlined the requirements for issuance of an alternative writ of mandamus:

A party petitioning for a writ of mandamus must establish a clear legal right to performance of the act requested, an indisputable legal duty, and no adequate remedy at law. When a trial court receives a petition for a writ of mandamus, its initial task is assessing the petition to determine whether it is facially sufficient. If it is not facially sufficient, the court may dismiss the petition. If the petition is facially sufficient, the court must issue an alternative writ of mandamus requiring the respondent to show cause why the writ should not be issued.

914 So. 2d at 1067-68 (internal quotations and citations omitted). As will be demonstrated below, Petitioner has established all of the above requirements, and an alternative writ of mandamus should issue forthwith directing Respondent to show cause why the requested relief should not be granted.

5. In September 2020, Respondent received a grant award by CTCL totaling \$6,808,977.94, to alter procedures related to the administration of the 2020 federal elections. Respondent was instructed that the funds could be spent for the CTCL's acceptable categories of use upon receipt and until December 31, 2020. See Exhibit A.

6. According to Respondent's filed CTCL COVID-19 Response Grant Report, in January 2021, Respondent reported that a total of \$1,346,731.76 or 20% of the funds received by Respondent from CTCL, were still held in public accounts. Respondent also asked CTCL for a 6-month extension to dispense with remaining monies. See Exhibit B.

7. On May 6, 2021, Governor Ron DeSantis, signed Senate Bill 90 into law.

8. Senate Bill 90 created Section 97.0291 of Florida Statutes and prohibits the receipt or use of private funds to administer elections. The full provision provides as follows:

Prohibition on use of private funds for election related expenses.

No agency or state or local official responsible for conducting elections, including, but not limited to, a supervisor of elections, may solicit, accept, use, or dispose of any donation in form of money, grants, property, or personal services from an individual or a nongovernmental entity for the purpose of funding election related expenses or voter education, voter outreach, or registration programs. This section does not prohibit the donation and acceptance of space to be used as a polling room or an early voting site.

9. Section 97.0291 of Florida Statutes now prohibits Respondent from using any of the remaining funds in Respondent's possession which originated from the 2020 grant from CTCL, a private nongovernmental organization.

10. Respondent has no discretion as to the use of the funds and must return the unused funds.

11. On May 18, 2021, counsel for the Petitioner sent a letter via email and by overnight certified mail to the Respondent requesting (1) that Respondent return all CTCL funds currently in Respondent's possession, and (2) in the event that Respondent has used the remaining funds, requesting an accounting for their use and the dates of the expenditures. Petitioner requested a response to her demand by 11:59 pm local time on May 20, 2021. See Exhibit C.

12. The certified letter was signed for by J. Felton at 11:58 AM on May 20, 2021. See Exhibit D. Emails including the demand letter as an attachment

was sent to the following email addresses: wendylink@pbcelections.org and info@pbcelections.org on May 18, 2021.

13. Section 97.0291 of Florida Statutes prohibits the Respondent from any additional use of the remaining funds received from CTCL. Respondent has no discretion on this matter and must return the unused funds.

14. Petitioner did not receive a response until 11:33 A.M. on May 26, 2021. In the response, Respondent stated that she “has no legal obligation to immediately return outstanding funds to the CTCL.” See Exhibit E.²

Clear Legal Right

15. “Mandamus is defined as a remedy to command performance of a ministerial act that the person deprived has a right to demand, or a remedy where public officials or agencies may be coerced to perform ministerial duties that they have a clear legal duty to perform.” *Town of Manalapan v. Rechler*, 674 So. 2d 789, 790 (1996). See also *Miami v. State*, 164 So. 2d 26 (Fla. 3d DCA 1964); *City of Coral Gables v. State ex rel. Worley*, 44 So. 2d 298 (Fla. 1950). Petitioner, as a resident of Florida and a U.S. Citizen, has a legal and public right to have the Respondent obey the law and adhere to Section 97.0291 of Florida Statutes by returning all remaining funds to CTCL.

² Petitioner sent demand letters to two other counties, Leon and Alachua. Notably, officials from Alachua County responded on May 18, 2021, and Leon County officials responded on May 19, 2021 via email. Officials from both counties have informed Petitioner that they are in the process of returning the funds and would provide an accounting shortly. Respondent is the sole election official to state that she is not required to return the unused funds received from CTCL in accordance with Florida Statute, 97.0291.

Legal Duty to Act

16. Respondent has a duty to follow the law. The acceptance of private funds for election purposes by any Florida election official is now prohibited, and these remaining funds must be returned to CTCL.

17. The Respondent's duty to act is ministerial. "A duty to act is ministerial when there is no room for the exercise of discretion, and the performance being required is directed by law." *Bennett v. Clerk of Circuit Court Citrus County*, 150 So. 3d 277 (2014) (quoting *Austin v. Crosby*, 866 So. 2d 742, 744 (Fla. 5th DCA 2004)). Adherence to Florida Statutes Section 97.0291 is not discretionary. The use of these funds is strictly prohibited.

No Adequate Remedy

18. The Respondent's failure to return all outstanding funds to the CTCL is in contravention of Section 97.0291, Florida Statutes, and the Petitioner has no adequate remedy at law or equity.

WHEREFORE, Petitioner respectfully petitions this Court to issue an alternative writ of mandamus commanding Respondent to perform her ministerial duty to discontinue use of any remaining funds received from CTCL, a nongovernmental organization, and return all remaining funds to CTCL until she appears before this Court on a day certain and obtains modification or nullification of such writ, together awarding Petitioner attorney's fees and such other and further relief as the Court deems just and proper.

Respectfully Submitted

/s/ Joseph Van de Bogart
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Attorneys for Petitioner



CENTER FOR
TECH AND
CIVIC LIFE

September 30, 2020

Palm Beach County, Florida
Supervisor of Elections
240 South Military Trail
West Palm Beach, FL 33415

Dear Wendy Sartory Link,

I am pleased to inform you that based on and in reliance upon the information and materials provided by Palm Beach County, and the special circumstances Palm Beach County faces administering elections in 2020, the Center for Tech and Civic Life ("CTCL"), a nonprofit organization tax-exempt under Internal Revenue Code ("IRC") section 501(c)(3), has decided to award a grant to support the work of the Palm Beach County Supervisor of Elections ("Grantee").

The following is a description of the grant:

AMOUNT OF GRANT: \$ 6,808,977.94 USD

PURPOSE: The grant funds must be used exclusively for the public purpose of planning and operationalizing safe and secure election administration in Palm Beach County in 2020 ("Purpose").

Before CTCL transmits these funds to Grantee, CTCL requires that Grantee review and sign this agreement ("Grant Agreement") and agree to use the grant funds in compliance with the Grant Agreement and with United States tax laws and the laws and regulations of your state and jurisdiction ("Applicable Laws"). Specifically, by signing this letter Grantee certifies and agrees to the following:

1. Grantee is a local government unit or political subdivision within the meaning of IRC section 170(c)(1).

Exhibit "A"

2. This grant shall be used only for the Purpose described above, and for no other purposes.
3. Due to special circumstances Grantee faces administering elections in 2020, Grantee has produced a plan for safe and secure election administration in 2020, including an assessment of election administration needs and budget estimates for such assessment ("Safe Voting Plan"). The Safe Voting Plan is attached to this agreement. Grantee shall expend the total amount of grant funds listed in the Safe Voting Plan as detailed in the Safe Voting Plan, but may reallocate funds between budget items listed in the Safe Voting Plan or to any other permissible public purpose listed in the online grant application with notice by electronic mail to CTCL. Such reallocation does not require the permission of CTCL.
4. Grantee shall not use any part of this grant to make a grant to another organization, except in the case where the organization is a local government unit or political subdivision within the meaning of IRC section 170(c)(1) or a nonprofit organization tax-exempt under IRC section 501(c)(3), and the subgrant is intended to accomplish the Purpose of this grant. Grantee shall take reasonable steps to ensure that any such subgrant is used in a manner consistent with the terms and conditions of this Grant Agreement, including requiring that subgrantee agrees in writing to comply with the terms and conditions of this Grant Agreement.
5. The grant project period of June 15, 2020 through December 31, 2020 represents the dates between which covered costs may be applied to the grant. The Grantee shall expend the amount of this grant for the Purpose by December 31, 2020.
6. Grantee is authorized to receive this grant from CTCL and certifies that (a) the receipt of these grant funds does not violate any Applicable Laws, and (b) Grantee has taken all required, reasonable and necessary steps to receive, accept and expend the grant in accordance with the Purpose and Applicable Law.
7. The Grantee shall produce a brief report explaining and documenting how grant funds have been expended in support of the activities described in paragraph 3. This report shall be sent to CTCL no later than January 31, 2021 in a format approved by CTCL and shall include with the report a signed certification by Grantee that it has complied with all terms and conditions of this Grant Agreement.
8. This grant may not supplant previously appropriated funds. The Grantee shall not reduce the budget of the Supervisor of Elections ("the Election Department") or fail to appropriate or provide previously budgeted funds to the Election Department for the term of this grant. Any amount supplanted, reduced or not provided in contravention of this paragraph shall be repaid to CTCL up to the total amount of this grant.
9. CTCL may discontinue, modify, withhold part of, or ask for the return all or part of the grant funds if it determines, in its sole judgment, that (a) any of the above terms and conditions of this grant have not been met, or (b) CTCL is required to do so to comply with applicable laws or regulations.



10. The grant project period of June 15, 2020 through December 31, 2020 represents the dates between which covered costs for the Purpose may be applied to the grant.

Your acceptance of and agreement to these terms and conditions and this Grant Agreement is indicated by your signature below on behalf of Grantee. Please have an authorized representative of Grantee sign below, and return a scanned copy of this letter to us by email at grants@techandciviclelife.org.

On behalf of CTCL, I extend my best wishes in your work.

Sincerely,



Tiana Epps Johnson

Executive Director

Center for Tech and Civic Life

GRANTEE

By: Wendy Santory Link

Title: Supervisor of Elections

Date: 9/30/2020



CENTER FOR TECH & CIVIC LIFE
233 N. MICHIGAN AVE., SUITE 1800
CHICAGO, IL 60601
HELLO@TECHANDCIVICLIFE.ORG

To: Center for Tech and Civic Life

From: Wendy Sartory Link, Supervisor of Elections, Palm Beach County, Florida

Date: September 29, 2020

Palm Beach County Safe Voting Plan

Overview - Need

Palm Beach County faces significant challenges in executing the November 3, 2020, general election due to Palm Beach County's population, the geographical size of the county, number of vulnerable and diverse residents, fear of COVID-19, and the expected voter turnout. These factors affect the Supervisor of Elections' ability to ensure voter education, accessibility, safety, security, and confidence across its 39 municipalities and the rest of the County.

The Supervisor of Elections (SOE) has expressed concerns regarding issues such as disseminating information about voting, implementing safety precautions amid COVID-19, expanding access to all eligible voters, and bolstering voter confidence. Measures were enacted in the March 17, 2020 presidential preference primary and the August 18, 2020 primary elections, but the upcoming November presidential election poses even greater challenges including expectations of record-breaking voter turnout, widespread fear among voters and poll-workers about COVID-19 exposure, and sufficient accessibility to all voters. Palm Beach County is the third-largest county in Florida covering 1,971 square miles; it encompasses more square footage than Delaware and Rhode Island, and is home to 1.497 million residents, over 1 million of whom are registered to vote. Very often in big elections all eyes around the nation are on Palm Beach County.

Voter Education is the foundation of increased awareness and registration, and ultimately the motivation behind voter participation. The old methods of providing voter education are outdated given the decline in newspaper sales, increase in social media, diversification of the population, and increased access to information in rural parts of the County. According to the Palm Beach County School District, 146 different languages are spoken in the homes of students. The volume and variety of messaging also presents a significant cost. The SOE will create messaging about voter registration, accessibility, three ways to vote, voter safety from COVID-19, and transparency to instill voter confidence and trust. Voter education will range from advertisements (billboards, tv, radio, newspaper, and digital) community events (tele-town hall meetings, speakers bureau events) to direct communication (direct mail, phone calls, texts, and emails). Specific messages to special populations (seniors, disabled, minorities) will communicate the safety and security measures put in place to make voting accessible and safe. Overall, the message to be communicated is that the votes, no matter how they are cast, will be counted in a timely manner, processed securely, tracked effectively, and counted accurately.

The SOE makes it a priority to ensure that everyone who is eligible to vote has access to the polls. Palm Beach County has seen an increased demand for vote-by-mail ballots, especially from senior populations who suffer a greater risk of exposure to COVID-19. Offering more ways to vote is a critical means to address the needs of non-English speakers, people with disabilities, and voters avoiding long lines or waiting hours during voting. During the March and August elections, the SOE lost approximately 600 poll workers due to the fear of COVID-19. Conversely, Palm Beach County experienced an increased voter turnout of 1.2 % compared to previous August primaries. The SOE's goal is to recruit a significant number of competent, trustworthy poll workers to oversee and manage Election Day polling locations, and to deliver timely and accurate results. Recruiting the right people is critical especially in light of the dangers faced by older poll workers fearing risks of the current health crisis. Funding is necessary to recruit, train, and incentivize the best possible poll workers. New state rules regarding masks and the need to no longer require them, will make it harder to recruit poll workers and SOEs need to offer incentive pay to ensure we have the appropriate staff levels.

Voter safety and security are more important than ever in the midst of the current pandemic. The SOE has had to rethink the training process, recruitment of workers, social distancing of voters, polling location requirements, touchless tools, and cleaning procedures. More equipment, cleaning supplies, and technology need to be purchased in order to remain in compliance with health and safety standards. The SOE sought the assistance of Homeland Security earlier this year to conduct an in-depth sweep of the entirety of the SOE's network to ensure that the system was clean of all possible threats. Their recommendations were implemented and we continue to improve cybersecurity. The SOE's IT department remains constantly vigilant as it strives to identify and extinguish possible cyber-threats.

Voter confidence is inspired by the culmination of transparent and clear communication, effective and efficient policies and processes, accountable actions, and inclusive services to all eligible voters. Palm Beach County has experienced challenging elections in the past, which challenged the public's confidence in the office as a result. Changes in leadership brought about a new era of elections in Palm Beach County and an office that strives for integrity, accountability, and service to benefit each and every voter in the county. The SOE strives to build confidence in the process with upgraded technology, improved internal staff practices, uniform voting procedures at all polling locations, and clear, consistent communications of all forms. The county budget, which includes the SOE budget, was passed before we knew all of the effects of COVID, the extent of the increased demand for vote by mail ballots (approximately 300% greater than what was mailed in the March Presidential Preference Primary and Municipal Elections), and how much it would affect operations. Additional funds are sought to support all of the systems, processes, equipment, and communications necessary to deliver the ideal election. Currently, the SOE's budget is \$16,555,547.00, with the ability to seek additional funds for PPE.

The \$6,808,977.95 request is critical for the SOE to:

- expand voter education through diverse and varied ways, so as to reach all eligible voters;
- creatively recruit, train and retain poll workers by providing current training, addressing all safety and security issues and offering hazard/incentive pay when necessary;
- expand the number of in-person early voting sites, offer "mobile" ballot drop boxes, and make upgrades to handle the increased volume of mail-in ballots; and
- ensure safe, accessible, trustworthy voter experience throughout all three forms of voting with increased communication, and improved technology in all secured polling places.

For the November election, the number of **total registered voters is expected to be between 1,050,000 to 1,070,000** - casting ballots split between the three modes of voting. This document offers an assessment of resources needed for Palm Beach County to safely and thoroughly prepare for the general election.

A preliminary budget overview estimate on top of what is already available to the County is as follows:

Abstentee/Vote-by-Mail Ballot Assembly and Processing Equipment	1,255,733.65
Early Voting Sites and Ballot Drop-off Options	1,333,573.65
In-person Voting at Polling Places on Election Day	\$2,721,411.65
Secure Dropboxes and related needs	\$922,000.00
Outreach and Education	\$576,258.99
Total	\$6,808,977.94

Needs Assessment & Costs

The following sections outline the initial details of the operation and costs associated with each of the aforementioned categories.

Absentee (VBM) Ballot Assembly and Processing Equipment

For the November elections, the SOE anticipates vote-by-mail turnout to be close to 500,000 ballots with an anticipated 90% return rate. Automation will be critical to efficiently and accurately manage ballot envelopes and ballots in weeks leading up to Election Day and in the canvassing process afterward. To that end, the following is needed:

- **Personnel:** The SOE currently has 65 permanent and seasonal staff members, hired to tabulate vote-by-mail ballots. Due to the number of ballots the SOE anticipates receiving for the November general election, an additional 100-150 staff members will be necessary to ensure timely results on Election Day.
- **Outreach Materials:** To promote vote-by-mail and early voting ahead of the November election by undertaking several outreach activities to reach as many eligible voters in the following ways:
 - Signage on Billboards – Billboards will be used across the county along major thoroughfares (e.g. I95, SR 80) in traditional and digital formats.
 - Buses & Benches – Digital and temporary wrap advertisements are effective on public transportation and at bus stop benches and shelters.
 - Digital marketing, social channel and search engine advertisements – will be spread across traditional platforms (Facebook, Search, YouTube, Google, Pandora, etc.) as well as non-traditional platforms such as Reddit, Twitch, and Quora.
 - Direct Mail Communications – includes three distinct mailpieces. The first message, “You have 3 ways to vote” will go to all voters. The second message, “Update your signature to match your ballot. Track your ballot. Find the drop-off locations.” will go to vote-by-mail voters along with a pre-paid postage return card. The third message, “Here’s your checklist to vote safely, in-person” will go to early voting and Election Day voters.
 - Email Communications -two emails per week will go to hundreds-of-thousands of voters to provide voter information and elections updates.
 - Live Phone Calls – conducted by professional and authorized call centers domestically to update voters on voting options, processes, questions, and urging them to return ballots early to be counted.
 - Recorded Calls – containing recorded messages and voter alerts will be used.
 - Texting Program – a two-way texting program will be implemented so that information can be shared with voters and voters can have questions answered.
 - Newspaper Advertisements – weekly advertisements will be placed in the major daily, weekly, and Hispano-Latino papers in English, Spanish, and Creole.

- Radio Advertisement – countywide radio advertising in all stations including Spanish and Haitian with proper translations.
 - TV Advertisement – network and cable television advertisements will run for one month with three different educational messages. The messages are: 1) You have three ways to vote, 2) You can vote by mail, return your ballot on time, and track your ballot, and 3) Here's how you vote early or vote on election day safely.
 - Employing a Speakers Bureau Coordinator – to be the point person responsible for organizing and coordinating the speakers' bureaus with local organizations, community, and political groups. This coordinator will serve as the outreach liaison to civic and community groups especially for minorities, seniors and nursing homes.
 - Tele-Town Halls – Seven tele-town halls will take place across the county; one in each county district. The SOE will host the virtual town hall meeting to answer voter questions, provide information about the three ways to vote and general updates. The SOE is inviting the County Commissioner from each district to participate.
 - Video/Radio Production and Graphics – the aforementioned advertisements are made possible with the assistance translators, graphic designer, voice-over, and other creatives.
- **Processing Equipment:** To process absentee/vote-by-mail ballots, we request:
 - EVID equipment is necessary to process the voter who is waiting in line to be confirmed at the right location and pre-checked to vote.
 - To process vote-by-mail ballots, we request folders, cutters, shakers, and joggers. These machines will expedite the time to process an expected 500,000 ballots. Once the pieces are purchased, they are expected to be delivered by mid-October 2020.
 - Due to the expected increase in voter turnout, several pieces of equipment are needed, including:
 - HP SD Pro 44 Scanner
 - HP Design Jet T830
 - Surface Laptops (3)
 - Call Center Laptops (50)
 - Polycon Conference Phones (3)
 - SMART Boards 700 Pro for voter education and training (10)

- **Safety and Security measures:** The SOE will invest in several methods to ensure a safe and secure election process, including IT security technology programs such as ObserveIt, ZeroTrust, and others. We are also requesting additional security cameras for our main headquarters and the voting equipment service center. Additionally, to help prevent the spread of COVID-19, we would like to install plexiglass shields for the opening tables and the Canvassing Board at the voting equipment service center warehouse.

	<u>Total cost</u>	<u>Units</u>	<u>Unit costs</u>
Personnel	\$48,166.67		*detail attached in excel spreadsheets
Outreach materials	\$866,666.67		
Equipment	\$113,933.33		
Safety and Security	\$226,966.99		
Total	\$1,255,733.65		

Early Voting Sites and Ballot Drop-off Options

Palm Beach County plans to have 18 full-time early voting locations, 3 outreach (outer office) locations, and no mobile voting precincts for November.

These must be sufficiently staffed with approximately 500 staff with \$100,000 dedicated for incentive/hazard pay to limit worker turnover, handle a surge in voters before polls open, and manage sites in a pandemic environment. It will cost significant resources to cover early voting and ballot drop off locations with the additional challenges surrounding turnout and Covid 19.

The SOE would like to have additional directional signage to guide voters to the Early Voting locations, as well as signs to indicate that vote-by-mail ballots can be dropped off there. For the secured drop boxes at the Early Voting sites as well as a drive-through drop site at our main office, we request tents, tables and chairs for the workers.

In order to expedite the lines as much as possible, we would like to purchase additional equipment and employ staff to "walk the lines" – having voters fill out address change forms, confirm whether their VBM ballot has already been counted, and expedite any other changes that can be made prior to the voter reaching the poll workers inside. To handle the lines outside, we need to purchase stanchions for crowd control.

The proportional cost to be applied to Early Voting and Ballot Drop-off of the **Marketing and Outreach** materials, and **the Equipment and Technology** described above in the Absentee section is also spread across this section (as set forth in the Budget sheets attached).

We would like to add plexiglass shields for the canvassing table to prevent the spread of COVID-19.

It will cost \$1,333,573.65 to cover all of the needs addressed above.

Secure Dropboxes

In the primary, the SOE had 1 secure dropbox. Installing an additional four (4) secure dropboxes for a total of five (5) will help ensure that voters have additional opportunities to return their ballots in person in the various geographic locations of each office. While we pay for return postage already in Palm Beach County, some voters are not comfortable with that option, or they may not have sufficient time to mail in their ballot.

In addition to equipment costs and cameras, 3 staff members and 3 sworn law enforcement officers will be needed to pick up deposited ballots and to monitor drop-off boxes. Additionally, the SOE would like to have 25 vans that are "wrapped" for identification and easily accessible to voters in sites that are either used as Early Voting sites, or are permitted by statute to be used as Early Voting sites, which allows us to have additional drop boxes, so long as they are secured by SOE personnel or sworn law-enforcement officers. We would like to have t-shirts to identify the workers as SOE staff so the voters know that it is safe to drop their ballots.

We will need 1,400 shifts covered for the mobile drop boxes – consisting of 4 people per day per site (25 sites) over 14 days. **The estimated cost for dropboxes, vans, and personnel to staff them is \$392,000.**

Additionally, we need to have cameras installed to have 24/7 video surveillance of the stationary dropboxes at each location.

The proportional cost to be applied to Early Voting and Ballot Drop-off of the **Marketing and Outreach** materials, and **the Equipment and Technology** described above in the Absentee section is also spread across this section (as set forth in the Budget sheets attached).

The total budget requested for the Secure Dropboxes and related needs is \$922,000.

In-person Voting at Polling Places on Election Day

Palm Beach County is committed to working tirelessly to secure fully-staffed polling places on election day. For the Primary, we lost 36 locations due to either the Governor's order related to Nursing Homes and Assisted Living Facilities, or due to polling locations making the determination that they were not going to permit a polling location on their property. The SOE is committed to securing between 420 and 430 in-person polling locations on November 3, 2020.

To staff these locations, the county will hire a total of 12 seasonal staff members through November to handle recruitment and retention of 5,000 election day workers, who will be essential to facilitate a smooth, in-person operation. Like Early Voting, we will need to provide incentive/hazard pay to recruit the required number of poll workers, limit turnover after training, and to manage the sites during a pandemic. Additionally, Palm Beach County will spend approximately \$200,000 on cleaning polling locations on election day, but we can seek those funds through CARES Act funding, so they are not included in the request.

During the last two elections, several measures (masks, hand sanitizers, routine cleaning procedures) were put in place to ensure the safety of voters, poll workers, and staff. However, there is a need for additional safety equipment due to the anticipated voter turnout. Funding is required for additional voting booth legs, which add distance between voters and additional voting booth screens (with the labor to double their height so as to create a taller barrier between voters), and additional plexiglass shields which create a barrier between voters and poll workers at polling locations, and the proportional cost of the plexiglass for the canvassing room.

Similar to the "walking the line" personnel and equipment described above for Early Voting, we request funding for each Election Day site for the same purpose, but with the additional benefit of directing a voter to their "new" polling location based on an address change *before* they stand in line for too long at their "old" polling location.

The proportional cost to be applied to Early Voting and Ballot Drop-off of the **Marketing and Outreach** materials, and **the Equipment and Technology** described above in the Absentee section is also spread across this section (as set forth in the Budget sheets attached).

	<u>Total cost</u>	<u>Units</u>	<u>Unit costs</u>
Worker Hazard Pay	\$500,000.00		
Poll Worker PPE	\$239,636.00		
Personnel Costs	\$472,166.67		
Outreach, Education and materials	\$123,408.99		
Security	\$1,386,200.00		
Total	\$2,721,411.65		

Voter Outreach, Communication, and Education

Our proposal includes a thorough and aggressive advertising, direct mail, press relations, outreach, and communication plan, which has been spread across the appropriate sections included herein, including this stand alone section. In order to adequately support the poll workers, we would like to hire additional field clerks and rovers, as well as runners. Some of the additional equipment/programs we have requested are proportionally spread across the category as well, since it will support these voter outreach and education efforts, as well as our poll worker and field clerk/rover training. We will need additional training for the additional poll workers and field clerks that we bring on to the team. A detailed breakdown is included in the attached budget. **The total amount requested for this category is \$576,258.99.**

Conclusion

Palm Beach County appreciates the opportunity to submit this grant request. The investments outlined above will allow the Supervisor of Elections to:

- expand voter education, communication and outreach;
- increase voter accessibility through education and equipment;
- maximize voter safety and security with cameras and plexiglass while reducing the risk of exposure to coronavirus for voters, election staff and poll workers with cleaning procedures and socially distanced voting booths;
- instill confidence in the 1.02 million eligible voters;
- innovate to efficiently and effectively educate our residents about how to exercise their right to vote;
- be intentional and strategic in reaching our historically disenfranchised residents and communities; and above all,
- ensure the right to vote in a diversity of communities throughout the county and to ensure that votes are cast securely and properly so they can be counted in a timely manner.

A preliminary budget overview estimate on top of what is already available to the County is as follows :

Section 1

TL Amount & TL Units

Absentee Ballot Assembly and Processing Equipment	1,255,733.65	#
Early Voting Sites and Ballot Drop-off Options	1,333,573.65	#
In-person Voting at Polling Places on Election Day	2,721,411.65	#
Secure Dropboxes and related needs	922,000.00	#
Outreach, Education & Communication	576,258.99	#
Total	6,808,977.95	#

BUDGET NARRATIVE

ITEM	BUDGETED AMOUNT	DESCRIPTION	Category
Folding equipment	\$ 6,400.00	paper folding equipment	1
Scales	\$ 21,000.00	30 scales to weigh ballots for better tracking during the counting process	1
Vote-By-Mail Assembly and Processing Equipment	\$ 12,000.00	Folders and cutters for vote by mail ballots	1
Early Voting Field Supplies	\$ 35,000.00	Tents, chairs, tables, coolers and supplies for voter information stations at all Early voting locations and for Election Day	2
Early Voting Field Supplies		Tents for voting by mail ballot drop offs at SOE office.	2
Electronic Directional Signage	\$ 16,400.00	Electronic signage for vote by mail ballot drop off at SOE office	2
Electronic Directional Signage		Electronic directional signage at Early Voting locations that have a history of being difficult to find	2
Additional poll workers	\$ 420,000.00	Goal is staff two additional poll workers at each polling location who are trained and can manage the increased voter participation	3
Election Day Polling Location Backup Staffing	\$ 4,000.00	Backup personnel to manage the county on Election Day if a polling location does not open on time.	3
Election Day Polling Location Backup Staffing		Need to have personnel who can arrive to help poll workers open the location	3
Voting Booth Legs	\$ 26,388.00	Additional legs for voting booths.	3
Voting Booth Legs		Due to COVID, many of the voting booths we traditional shared legs had to be separated to follow CDC guidelines	3
Voting Booth Screens	\$ 165,000.00	Privacy screens at voting locations that are extra high. Provides additional COVID19 safety by completing surrounding voter	3
Ballot Drop Off Boxes	\$ 42,000.00	28 locations for ballot drop offs	4
Ballot Drop Off Boxes		Locations must be secured and must have cameras to monitor	4
Mobile Vans for Ballot Pick up	\$ 350,000.00	Mobile vans to be stationed at 25 locations	4
Mobile Vans for Ballot Pick up		Vans to be wrapped for easy identification	4
Mobile Vans for Ballot Pick up		Two members staffing the vans all day (12 hour days)	4
Mobile Vans for Ballot Pick up		Tents provided and chairs to create voting drop off station	4
Staff Shirts	\$ 6,000.00	Election shirts for mobile van team members to ensure they are clearly marked and defined.	4
Field Operations and Staffing	\$ 50,000.00	Advance team members to coordinate the distribution, placement, and field work associated with the program.	5
Field Operations and Staffing		Field Operatives in neighborhoods, at early voting locations, and on Election Day	5
Billboards	\$ 75,000.00	Countywide billboards in both digital and traditional formats.	1, 2, 3
Buses / Benches	\$ 40,000.00	Wraps and digital advertising on buses and public transportation or bus stop locations and benches	1, 2, 3
Consulting Management and Creative	\$ 100,000.00	Management, messaging, placement, project oversight, creative copy and coordination of the program.	1, 2, 3

BUDGET NARRATIVE

ITEM	BUDGETED AMOUNT	DESCRIPTION	Category
Digital, Social & Search	\$ 250,000.00	Digital advertising across multiple mediums including Facebook, Search, YouTube, Google, Pandora, etc.	1, 2, 3
Digital, Social & Search		Include non-traditional platforms such as reddit, twitch, and quora.	1, 2, 3
Email Communications	\$ 50,000.00	Countywide email program about voter information and election updates.	1, 2, 3
Email Communications		Would focus on sending 2 emails per week.	1, 2, 3
Equipment Training	\$ 2,500.00	Additional training time and hours to educate poll workers on how voting equipment works	1, 2, 3
IT Security	\$ 165,000.00	Incident response technology	1, 2, 3
IT Security		Zero Trust Access	1, 2, 3
IT Security		Technology to ensure additional security on voter file and office info	1, 2, 3
Live Phone Calls	\$ 200,000.00	Live professional calls with voter updates on voting, urging them to return their ballot, capturing questions and providing updates. Vote by mail voters will be encouraged to return ballots early to ensure they count.	1, 2, 3
Newspaper Ads	\$ 125,000.00	Weekly ads in the major daily newspapers	1, 2, 3
Newspaper Ads		Sticky note on front page of papers on on Election Day	1, 2, 3
Newspaper Ads		Ads in the weekly papers	1, 2, 3
Newspaper Ads		Ads in the both Spanish and Haitian / Caribbean papers with translations	1, 2, 3
Newspaper Ads			1, 2, 3
Observeit Security IT Program	\$ 60,000.00	Security IT program to protect voter data	1, 2, 3
Paper Ballot Counters	\$ 214,000.00	20 machines to help count ballots. To be used to process ballots more efficiently or in the cast of a recount. These counters ensure the correct amount of ballots are processed ensuring a greater level of transparency and accountability	1, 2, 3
Paper joggers	\$ 9,600.00	12 Joggers to help sort and prepare Vote by Mail for counting	1, 2, 3
Plexiglass Canvassing Room	\$ 10,674.00	Canvassing room with plexiglass for health and safety	1, 2, 3
Radio Advertising	\$ 100,000.00	Countywide Radio advertising program	1, 2, 3
Radio Advertising		Ads in all stations, including Spanish and Haitian Creole stations with translations	1, 2, 3
Recorded Calls	\$ 50,000.00	Voter alerts and calls via recorded message	1, 2, 3
Speakers Bureau Coordinator and Outreach	\$ 30,000.00	Point person responsible for organizing and coordinating speakers' bureaus to local organizations, community and political groups and serving as the outreach liaison to various organizations.	1, 2, 3
Tele-Town Halls	\$ 50,000.00	Telephonic Town Halls with voters. Divided into 7 different regions and host virtual town halls for voters to get their questions answered, information about voting by mail, early voting and general updates.	1, 2, 3
Texting Program	\$ 200,000.00	Two way texting program to share information and answer questions with voters.	1, 2, 3
Texting Program		Creation of a keyword phrase reply where voters can have their questions auto answered.	1, 2, 3

BUDGET NARRATIVE

ITEM	BUDGETED AMOUNT	DESCRIPTION	Category
Video/Radio Production and Graphics	\$ 50,000.00	Three TV ads, 12 radio ads including some in different languages, translations, graphic design and other similar creative	1, 2, 3
Dedicated Press Relations and Media Contact	\$ 20,000.00	Generating weekly press releases and serving as a contact for local media	1, 2, 3, 4, 5
Dedicated Press Relations and Media Contact		Organizing press conferences, releases and media events	1, 2, 3, 4, 5
Direct Mail	\$ 950,000.00	Three direct mail pieces. One will go to all voters, one will go to VBM only, and one will go to Early Voting and Election Day voters.	1, 2, 3, 4, 5
Direct Mail		Includes a pre-postage return card for voters to update their signature.	1, 2, 3, 4, 5
Direct Mail		Mailer 1 to all voters: 3-ways to vote	1, 2, 3, 4, 5
Direct Mail		Mailer 2 to vote by mail: update your signature to match your ballot. Track your ballot. Drop off locations.	1, 2, 3, 4, 5
Direct Mail		Mailer 3: Voter checklist for when you go to the polls and vote safely .	1, 2, 3, 4, 5
TV Advertisement	\$1,400,000.00	Four weeks of television advertisements.	1, 2, 3, 4, 5
TV Advertisement		Ads will run on network and cable.	1, 2, 3, 4, 5
TV Advertisement		Three TV spots: (1) Three ways to vote (2) voting by mail and tracking your ballot (3) Early Voting and Election Day	1, 2, 3, 4, 5
Additional Equipment and Technology	\$ 193,635.96	HP SD Pro 44 Scanner	1, 2, 3, 5
Additional Equipment and Technology		HP Design Jet T830	1, 2, 3, 5
Additional Equipment and Technology		Surface Laptops (3)	1, 2, 3, 5
Additional Equipment and Technology		Call Center Laptops (50)	1, 2, 3, 5
Additional Equipment and Technology		Polycom Conference phones	1, 2, 3, 5
Additional Equipment and Technology		SMART Boards700 Pro for voter education and training	1, 2, 3, 5
Additional Equipment and Technology		Computers and cameras for SMART Boards	1, 2, 3, 5
Cameras for warehouse and SOE office	\$ 150,000.00	Cameras for additional security at Voter Equipment Service Center and Main Office	1, 4
COVID 19 Sign	\$ 20,000.00	Signage talking about COVID-19 safety procedures	2, 3
COVID 19 Sign		Two per polling location	2, 3
EVID equipment for "walking the line"	\$ 450,000.00	EVID equipment for each polling location.	2, 3
EVID equipment for "walking the line"		Will allow a polling worker to walk up and down the voting line to pre-check people in and ensure they are at the right polling location	2, 3
Hazard Pay	\$ 600,000.00	COVID19 hazard pay to ensure we have enough staffing for election day.	2, 3
Hazard Pay		The new non mask rules will make it more difficult to recruit poll workers	2, 3
Hazard Pay		5000 poll workers, 60 field clerks and 30 rovers	2, 3

BUDGET NARRATIVE

ITEM	BUDGETED AMOUNT	DESCRIPTION	Category
Sit and Stand Set Up Stantions	\$ 38,680.00	40 EVID stantions for check in equipment	2, 3
Stantions	\$ 23,000.00	Stantions for during Early Voting to better manage the crowd and help with voter accessibility	2, 3
Vote Signs and Directional Signs	\$ 20,000.00	Directional signs for Election Day	2, 3
Vote Signs and Directional Signs		Voting signs for countywide outreach	2, 3
PA system with mics	\$ 7,700.00	PA system for training poll workers. System can also be used for crowd control during during early voting period	3, 5
	\$6,808,977.96		

MASTER DISTRIBUTION

	1	2	3	4	5	
	Absentee Ballot Assembly and Processing Equipment	Early Voting Sites and Ballot Drop-off Options	In-person Voting at Polling Places on Election Day	Secure Dropboxes and related needs	Outreach, Communication, Education	Total
Electronic Directional Signage	O	16,400.00	O			16,400.00
Vote-By-Mail Assembly and Processing Equipment	12,000.00	E	E			12,000.00
Equipment Training	833.33	P	833.33	E		2,500.00
Hazard Pay	P	100,000.00	O	P		600,000.00
Plexiglass Canvassing Room	3,558.00	P	3,558.00	E		10,674.00
Ballot Drop Off Boxes				42,000.00	E	42,000.00
Early Voting Field Supplies		35,000.00	E			35,000.00
Mobile Vans for Ballot Pick up				350,000.00	E	350,000.00
Additional Equipment and Technology	48,408.99	E	48,408.99	E	48,408.99	193,635.95
Field Operations and Staffing		-	P		50,000.00	50,000.00
Staff Shirts		E	E	6,000.00		6,000.00
Voting Booth Legs		E	E			26,388.00
Voting Booth Screens		E	E			165,000.00
Additional poll workers			420,000.00	P		420,000.00
Election Day Polling Location Backup Staffing			4,000.00	P		4,000.00
EVID equipment for "walking the line"		20,000.00	e			450,000.00
Vote Signs and Directional Signs		5,000.00	e			20,000.00
Paper Counters	71,333.33	e	71,333.33	e		214,000.00
Scales	21,000.00	e				21,000.00
Observe/Security IT Program	20,000.00	e	20,000.00	e		60,000.00
PA System with wireless lapel mics			3,850.00		3,850.00	7,700.00
Paper Joggers	3,200.00		3,200.00			9,600.00
Folder	6,400.00					6,400.00
Stations for Crowd Control		11,500.00				23,000.00
Sit & Stand Set Up Stations		19,340.00				38,680.00
Billboards	25,000.00	O	25,000.00	O		75,000.00
Buses / Benches	13,333.33	O	13,333.33	O		40,000.00
Cameras for warehouse and SOE office	100,000.00			50,000.00		150,000.00
Consulting Management and Creative	33,333.33	P	33,333.33	P		100,000.00
COVID 19 Sign		10,000.00	O			20,000.00
Dedicated Press Relations and Media Contact	4,000.00	P	4,000.00	P	4,000.00	20,000.00
Digital, Social & Search	83,333.33	O	83,333.33	O		250,000.00
Direct Mail	190,000.00	O	190,000.00	O	190,000.00	950,000.00
Email Communications	16,666.67	O	16,666.67	O		50,000.00
IT Security	55,000.00	E	55,000.00	E		165,000.00
Live Phone Calls	66,666.67	O	66,666.67	O		200,000.00
Newspaper Ads	41,666.67	O	41,666.67	O		125,000.00
Radio Advertising	33,333.33	O	33,333.33	O		100,000.00
Recorded Calls	16,666.67	O	16,666.67	O		50,000.00
Speakers Bureau Coordinator and Outreach	10,000.00	P	10,000.00	P		30,000.00
Tele-Town Halls	16,666.67	O	16,666.67	O		50,000.00
Texting Program	66,666.67	O	66,666.67	O		200,000.00
TV Advertisement	280,000.00	O	280,000.00	O		1,400,000.00
Video/Radio Production and Graphics	16,666.67	O	16,666.67	O	280,000.00	50,000.00
	1,255,733.65	1,333,573.65	2,721,411.65	922,000.00	576,258.99	6,808,977.95
						6,808,977.95

Line Items
P personnel
O outreach materials
E Equipment

Absentee Ballot Assembly and Processing Equipment

Absentee Ballot Assembly and Processing Equipment	Total cost	Units	Unit costs
Personnel	48,166.67		
Outreach materials	866,666.67		
Equipment	113,933.33		
Security	226,966.99		
Total	1,255,733.65		

Cameras for warehouse and SOE office	100,000.00	S
Plexiglass Canvassing Room	3,558.00	S
IT Security	55,000.00	S
Additional Equipment and Technology	48,408.99	S
Observeit Security IT Program	20,000.00	S
Scales	21,000.00	e
Paper Counters	71,333.33	e
Vote-By-Mail Assembly and Processing Equipment	12,000.00	E
Folder	6,400.00	e
Paper Joggers	3,200.00	e
TV Advertisement	280,000.00	O
Direct Mail	190,000.00	O
Digital, Social & Search	83,333.33	O
Live Phone Calls	66,666.67	O
Texting Program	66,666.67	O
Newspaper Ads	41,666.67	O
Radio Advertising	33,333.33	O
Billboards	25,000.00	O
Email Communications	16,666.67	O
Recorded Calls	16,666.67	O
Tele-Town Halls	16,666.67	O
Video/Radio Production and Graphics	16,666.67	O
Buses / Benches	13,333.33	O
Consulting Management and Creative	33,333.33	P
Speakers Bureau Coordinator and Outreach	10,000.00	P
Dedicated Press Relations and Media Contact	4,000.00	P
Equipment Training	833.33	P

1,255,733.65

113,933.33 EQUIPMENT
866,666.67 OUTREACH
48,166.67 PERSONNEL
226,966.99 SECURITY
1,255,733.65

In-person Voting at Polling Places on Election Day

In-person Voting at Polling Places on Election Day	Total cost	Units	Unit costs
Poll Worker Hazard Pay	\$500,000.00	#	\$#
Poll Worker PPE	\$239,636.00	#	\$#
Personnel Costs	\$472,166.67	#	\$#
Outreach, Education & Communication	\$123,408.99	#	\$#
Security	\$1,386,200.00		
Total	\$2,721,411.65		

3

In-person Voting at Polling Places on Election Day	In-person Voting at Polling Places on Election Day		
Hazard Pay	500,000.00	H	H
EVID equipment for "walking the line"	430,000.00	O	P
TV Advertisement	280,000.00	O	S
Direct Mail	190,000.00	O	Y
Digital, Social & Search	83,333.33	O	O
Paper Counters	71,333.33	O	
Live Phone Calls	66,666.67	O	
Texting Program	66,666.67	O	
Newspaper Ads	41,666.67	O	
Radio Advertising	33,333.33	O	
Billboards	25,000.00	O	
Email Communications	16,666.67	O	
Recorded Calls	16,666.67	O	
Tele-Town Halls	16,666.67	O	
Video/Radio Production and Graphics	16,666.67	O	
Vote Signs and Directional Signs	15,000.00	O	
Buses / Benches	13,333.33	O	
Paper Joggers	3,200.00	O	
Voting Booth Screens	165,000.00	P	
Voting Booth Legs	26,388.00	P	
Sit & Stand Set Up Stanchions	19,340.00	P	
Stanchions for Crowd Control	11,500.00	P	

500,000.00 Hazard Pay
239,636.00 PPE
472,166.67 Personnell Costs
123,408.99 Security
1,386,200.00 Outreach, Education & Comms
2,721,411.65

In-person Voting at Polling Places on Election Day

COVID 19 Sign	10,000.00	P
PA System with wireless lapel mics	3,850.00	P
Plexiglass Canvassing Room	3,558.00	P
Additional poll workers	420,000.00	S
Consulting Management and Creative	33,333.33	S
Speakers Bureau Coordinator and Outreach	10,000.00	S
Election Day Polling Location Backup Staffing	4,000.00	S
Dedicated Press Relations and Media Contact	4,000.00	S
Equipment Training	833.33	S
IT Security	55,000.00	Y
Additional Equipment and Technology	48,408.99	Y
Observeit Security IT Program	20,000.00	Y
	2,721,411.65	

ITEM	BUDGETED AMOUNT	DESCRIPTION	Category
Folding equipment	\$ 6,400.00	paper folding equipment	1
Scales	\$ 21,000.00	30 scales to weigh ballots for better tracking during the counting process	1
Vote-By-Mail Assembly and Processing Equipment	\$ 12,000.00	Folders and cutters for vote by mail ballots	1
Early Voting Field Supplies	\$ 35,000.00	Tents, chairs, tables, coolers and supplies for voter information stations at all Early voting locations and for Election Day	2
Early Voting Field Supplies		Tents for voting by mail ballot drop offs at SOE office.	2
Electronic Directional Signage	\$ 16,400.00	Electronic signage for vote by mail ballot drop off at SOE office	2
Electronic Directional Signage		Electronic directional signage at Early Voting locations that have a history of being difficult to find	2
Additional poll workers	\$ 420,000.00	Goal is staff two additional poll workers at each polling location who are trained and can manage the increased voter participation	3
Election Day Polling Location Backup Staffing	\$ 4,000.00	Backup personnel to manage the county on Election Day if a polling location does not open on time.	3
Election Day Polling Location Backup Staffing		Need to have personnel who can arrive to help poll workers open the location	3
Voting Booth Legs	\$ 26,388.00	Additional legs for voting booths.	3
Voting Booth Legs		Due to COVID, many of the voting booths we traditional shared legs had to be separated to follow CDC guidelines	3
Voting Booth Screens	\$ 165,000.00	Privacy screens at voting locations that are extra high. Provides additional COVID19 safety by completing surrounding voter	3
Ballot Drop Off Boxes	\$ 42,000.00	28 locations for ballot drop offs	4
Ballot Drop Off Boxes		Locations must be secured and must have cameras to monitor	4
Mobile Vans for Ballot Pick up	\$ 350,000.00	Mobile vans to be stationed at 25 locations	4
Mobile Vans for Ballot Pick up		Vans to be wrapped for easy identification	4
Mobile Vans for Ballot Pick up		Two members staffing the vans all day (12 hour days)	4
Mobile Vans for Ballot Pick up		Tents provided and chairs to create voting drop off station	4
Staff Shirts	\$ 6,000.00	Election shirts for mobile van team members to ensure they are clearly marked and defined.	4
Field Operations and Staffing	\$ 50,000.00	Advance team members to coordinate the distribution, placement, and field work associated with the program.	5
Field Operations and Staffing		Field Operatives in neighborhoods, at early voting locations, and on Election Day	5
Billboards	\$ 75,000.00	Countywide billboards in both digital and traditional formats.	1, 2, 3
Buses / Benches	\$ 40,000.00	Wraps and digital advertising on buses and public transportation or bus stop locations and benches	1, 2, 3
Consulting Management and Creative	\$ 100,000.00	Management, messaging, placement, project oversight, creative copy and coordination of the program.	1, 2, 3
Digital, Social & Search	\$ 250,000.00	Digital advertising across multiple mediums including Facebook, Search, YouTube, Google, Pandora, etc.	1, 2, 3
Digital, Social & Search		Include non traditional platforms such as reddit, twitch, and quora.	1, 2, 3
Email Communications	\$ 50,000.00	Countywide email program about voter information and election updates.	1, 2, 3
Email Communications		Would focus on sending 2 emails per week.	1, 2, 3
Equipment Training	\$ 2,500.00	Additional training time and hours to educate poll workers on how voting equipment works	1, 2, 3
IT Security	\$ 165,000.00	Incident response technology	1, 2, 3
IT Security		Zero Trust Access	1, 2, 3
IT Security		Technology to ensure additional security on voter file and office info	1, 2, 3
Live Phone Calls	\$ 200,000.00	Live professional calls with voter updates on voting, urging them to return their ballot, capturing questions and providing updates.	1, 2, 3
Live Phone Calls		Vote by mail voters will be encouraged to return ballots early to ensure they count.	1, 2, 3
Newspaper Ads	\$ 125,000.00	Weekly ads in the major daily newspapers	1, 2, 3
Newspaper Ads		Sticky note on front page of papers on on Election Day	1, 2, 3
Newspaper Ads		Ads in the weekly papers	1, 2, 3
Newspaper Ads		Ads in the both Spanish and Haitian / Caribbean papers with translations	1, 2, 3
Newspaper Ads			1, 2, 3
Obsveit Security IT Program	\$ 60,000.00	Security IT program to protect voter data	1, 2, 3
Paper Ballot Counters	\$ 214,000.00	20 machines to help count ballots. To be used to process ballots more efficiently or in the cast of a recount. These counters ensure the correct amount of ballots are processed ensuring a greater level of transparency and accountability	1, 2, 3
Paper jogggers	\$ 9,600.00	12 Joggers to help sort and prepare Vote by Mail for counting	1, 2, 3
Plexiglass Canvassing Room	\$ 10,674.00	Canvassing room with plexiglass for health and safety	1, 2, 3

Radio Advertising	\$ 100,000.00	Countywide Radio advertising program	1, 2, 3
Radio Advertising		Ads in all stations, including Spanish and Haitian Creole stations with translations	1, 2, 3
Recorded Calls	\$ 50,000.00	Voter alerts and calls via recorded message	1, 2, 3
Speakers Bureau Coordinator and Outreach	\$ 30,000.00	Point person responsible for organizing and coordinating speakers' bureaus to local organizations, community and political groups and serving as the outreach liaison to various organizations.	1, 2, 3
Tele-Town Halls	\$ 50,000.00	Telephonic Town Halls with voters. Divided into 7 different regions and host virtual town halls for voters to get their questions answered, information about voting by mail, early voting and general updates.	1, 2, 3
Texting Program	\$ 200,000.00	Two way texting program to share information and answer questions with voters.	1, 2, 3
Texting Program		Creation of a keyword phrase reply where voters can have their questions auto answered.	1, 2, 3
Video/Radio Production and Graphics	\$ 50,000.00	Three TV ads, 12 radio ads including some in different languages, translations, graphic design and other similar creative	1, 2, 3
Dedicated Press Relations and Media Contact	\$ 20,000.00	Generating weekly press releases and serving as a contact for local media	1, 2, 3, 4, 5
Dedicated Press Relations and Media Contact		Organizing press conferences, releases and media events	1, 2, 3, 4, 5
Direct Mail	\$ 950,000.00	Three direct mail pieces. One will go to all voters, one will go to VBM only, and one will go to Early Voting and Election Day voters.	1, 2, 3, 4, 5
Direct Mail		Includes a pre-postage return card for voters to update their signature.	1, 2, 3, 4, 5
Direct Mail		Mailer 1 to all voters: 3-ways to vote	1, 2, 3, 4, 5
Direct Mail		Mailer 2 to vote by mail: update your signature to match your ballot. Track your ballot. Drop off locations.	1, 2, 3, 4, 5
Direct Mail		Mailer 3: Voter checklist for when you go to the polls and vote safely.	1, 2, 3, 4, 5
TV Advertisement	\$1,400,000.00	Four weeks of television advertisements.	1, 2, 3, 4, 5
TV Advertisement		Ads will run on network and cable.	1, 2, 3, 4, 5
TV Advertisement		Three TV spots: (1) Three ways to vote (2) voting by mail and tracking your ballot (3) Early Voting and Election Day	1, 2, 3, 4, 5
Additional Equipment and Technology	\$ 193,635.96	HP SD Pro 44 Scanner	1, 2, 3, 5
Additional Equipment and Technology		HP Design Jet T830	1, 2, 3, 5
Additional Equipment and Technology		Surface Laptops (3)	1, 2, 3, 5
Additional Equipment and Technology		Call Center Laptops (50)	1, 2, 3, 5
Additional Equipment and Technology		Polycorn Conference phones	1, 2, 3, 5
Additional Equipment and Technology		SMART Boards 700 Pro for voter education and training	1, 2, 3, 5
Additional Equipment and Technology		Computers and cameras for SMART Boards	1, 2, 3, 5
Cameras for warehouse and SOE office	\$ 150,000.00	Cameras for additional security at Voter Equipment Service Center and Main Office	1, 4
COVID 19 Sign	\$ 20,000.00	Signage talking about COVID-19 safety procedures	2, 3
COVID 19 Sign		Two per polling location	2, 3
EVID equipment for "walking the line"	\$ 450,000.00	EVID equipment for each polling location.	2, 3
EVID equipment for "walking the line"		Will allow a polling worker to walk up and down the voting line to pre-check people in and ensure they are at the right polling location	2, 3
Hazard Pay	\$ 600,000.00	COVID19 hazard pay to ensure we have enough staffing for election day.	2, 3
Hazard Pay		The new non mask rules will make it more difficult to recruit poll workers	2, 3
Hazard Pay		5000 poll workers, 60 field clerks and 30 rovers	2, 3
Sit and Stand Set Up Stations	\$ 38,680.00	40 EVID stations for check in equipment	2, 3
Stations	\$ 23,000.00	Stations for during Early Voting to better manage the crowd and help with voter accessibility	2, 3
Vote Signs and Directional Signs	\$ 20,000.00	Directional signs for Election Day	2, 3
Vote Signs and Directional Signs		Voting signs for countywide outreach	2, 3
PA system with mics	\$ 7,700.00	PA system for training poll workers. System can also be used for crowd control during early voting period	3, 5
	\$6,808,977.96		

A preliminary budget overview estimate on top of what is already available to the County is as follows :

Section 1

TL Amount & TL Units

Absentee Ballot Assembly and Processing Equipment	1,255,733.65	#
Early Voting Sites and Ballot Drop-off Options	1,333,573.65	#
In-person Voting at Polling Places on Election Day	2,721,411.65	#
Secure Dropboxes and related needs	922,000.00	#
Outreach, Education & Communication	576,258.99	#
Total	6,808,977.95	#

	1	2	3	4	5	
	Absentee Ballot Assembly and Processing Equipment	Line Item	Early Voting Sites and Ballot Drop-off Options	In-person Voting at Polling Places on Election Day	Secure Dropboxes and related needs	Outreach, Communication, Education
Electronic Directional Signage		O	16,400.00	O		
Vote-By-Mail Assembly and Processing Equipment	12,000.00	E		E		
Equipment Training	833.33	P	833.33	P	833.33	E
Hazard Pay		P	100,000.00	O		
Plexiglass Canvassing Room	3,558.00	P	3,558.00	P		
Ballot Drop Off Boxes					42,000.00	E
Early Voting Field Supplies						
Mobile Vans for Ballot Pick up			35,000.00	E		
Additional Equipment and Technology	48,408.99		48,408.99	E		
Field Operations and Staffing					350,000.00	E
Staff Shifts						
Voting Booth Legs				E	6,000.00	
Voting Booth Screens				E		
Additional poll workers				E		
Election Day Polling Location Backup Staffing						
EVID equipment for "walking the line"			20,000.00	e		
Vote Signs and Directional Signs			5,000.00	e		
Paper Counters	71,333.33	e	71,333.33	e		
Scales	21,000.00	e				
Observed Security IT Program	20,000.00	e	20,000.00	e		
PA System with wireless lapel mics			3,850.00			3,850.00
Paper Loggers	3,200.00		3,200.00			
Folder	6,400.00					
Stations for Crowd Control			11,500.00			
Sit & Stand Set Up Stations			19,340.00			
Billboards	25,000.00	O	25,000.00	O		
Buses / Benches	13,333.33	O	13,333.33	O		
Cameras for warehouse and SOE office	100,000.00				50,000.00	
Consulting Management and Creative	33,333.33	P	33,333.33	P		
COVID 19 Sign			10,000.00	O		
Dedicated Press Relations and Media Contact	4,000.00	P	4,000.00	P	4000	4,000.00
Digital, Social & Search	83,333.33	O	83,333.33	O		
Direct Mail	190,000.00	O	190,000.00	O		
Email Communications	16,666.67	O	16,666.67	O	190000	190,000.00
IT Security	55,000.00	E	55,000.00	E		
Live Phone Calls	66,666.67	O	66,666.67	O		
Newspaper Ads	41,666.67	O	41,666.67	O		
Radio Advertising	33,333.33	O	33,333.33	O		
Recorded Calls	16,666.67	O	16,666.67	O		
Speakers Bureau Coordinator and Outreach	10,000.00	P	10,000.00	P		
Tele-Town Halls	16,666.67	O	16,666.67	O		
Texting Program	66,666.67	O	66,666.67	O		
TV Advertisement	280,000.00	O	280,000.00	O		
Video/Radio Production and Graphics	16,666.67	O	16,666.67	O	280000	280,000.00
	1,255,733.65		1,333,573.65	2,721,411.65	922,000.00	576,258.99
						6,808,977.95

Line Items

P personnel
O outreach materials
E Equipment

Absentee Ballot Assembly and Processing Equipment	Total cost	Units	Unit costs
Personnel	51,724.67	#	\$#
Outreach materials	866,666.67	#	
Equipment	337,342.32	#	\$#
Total	1,255,733.65		

Cameras for warehouse and SOE office	100,000.00	e	
Paper Counters	71,333.33	e	
IT Security	55,000.00	E	
Additional Equipment and Technology	48,408.99	e	e
Scales	21,000.00	e	O
Observeit Security IT Program	20,000.00	e	p
Vote-By-Mail Assembly and Processing Equipment	12,000.00	E	
Folder	6,400.00	e	
Paper Jloggers	3,200.00	e	
TV Advertisement	280,000.00	O	
Direct Mail	190,000.00	O	
Digital, Social & Search	83,333.33	O	
Live Phone Calls	66,666.67	O	
Texting Program	66,666.67	O	
Newspaper Ads	41,666.67	O	
Radio Advertising	33,333.33	O	
Billboards	25,000.00	O	
Email Communications	16,666.67	O	
Recorded Calls	16,666.67	O	
Tele-Town Halls	16,666.67	O	
Video/Radio Production and Graphics	16,666.67	O	
Buses / Benches	13,333.33	O	
Consulting Management and Creative	33,333.33	P	
Speakers Bureau Coordinator and Outreach	10,000.00	P	
Dedicated Press Relations and Media Contact	4,000.00	P	
Plexiglass Canvassing Room	3,558.00	P	
Equipment Training	833.33	P	

337,342.32 EQUIPMENT
866,666.67 OUTREACH
51,724.67 PERSONNEL
1,255,733.65

1,255,733.65

In-person Voting at Polling Places on Election Day	Total cost	Units	Unit costs
Poll Worker Hazard Pay	\$500,000.00	#	\$#
Poll Worker PPE	\$239,636.00	#	\$#
Personnel Costs	\$472,166.67	#	\$#
Outreach, Education & Communication	\$123,408.99	#	\$#
Security	\$1,386,200.00		
Total	\$2,721,411.65		

3

In-person Voting at Polling Places on Election Day	In-person Voting at Polling Places on Election Day	
Hazard Pay	500,000.00	H
EVID equipment for "walking the line"	430,000.00	O
TV Advertisement	280,000.00	O
Direct Mail	190,000.00	O
Digital, Social & Search	83,333.33	O
Paper Counters	71,333.33	O
Live Phone Calls	66,666.67	O
Texting Program	66,666.67	O
Newspaper Ads	41,666.67	O
Radio Advertising	33,333.33	O
Billboards	25,000.00	O
Email Communications	16,666.67	O
Recorded Calls	16,666.67	O
Tele-Town Halls	16,666.67	O
Video/Radio Production and Graphics	16,666.67	O
Vote Signs and Directional Signs	15,000.00	O
Buses / Benches	13,333.33	O
Paper Loggers	3,200.00	O
Voting Booth Screens	165,000.00	P
Voting Booth Legs	26,388.00	P
Sit & Stand Set Up Stanchions	19,340.00	P
Stanchions for Crowd Control	11,500.00	P

500,000.00 Hazard Pay
 239,636.00 PPE
 472,166.67 Salary + Training
 123,408.99 Security
 1,386,200.00 Other - Consultants and
2,721,411.65

COVID 19 Sign	10,000.00	P
PA System with wireless lapel mics	3,850.00	P
Plexiglass Canvassing Room	3,558.00	P
Additional poll workers	420,000.00	S
Consulting Management and Creative	33,333.33	S
Speakers Bureau Coordinator and Outreach	10,000.00	S
Election Day Polling Location Backup Staffing	4,000.00	S
Dedicated Press Relations and Media Contact	4,000.00	S
Equipment Training	833.33	S
IT Security	55,000.00	Y
Additional Equipment and Technology	48,408.99	Y
Observer Security IT Program	20,000.00	Y
	2,721,411.65	

CTCL COVID-19 Response Grant Report

All grantees are required to submit a report by January 31, 2021.

Name *

Wendy Sartory Link
First Name Last Name

Email *

wendylink@pbcelections.org
example@example.com

State *

Florida

Jurisdiction Name *

Palm Beach County

ex: Adams County, Adams Twp, etc.

Office Name *

Supervisor of Elections
ex: Board of Elections

1. Total CTCL COVID-19 Response Grant received: *

6808977.94

2. Please indicate how much of the grant funds were spent on the following public purposes between the dates of June 15, 2020 and December 31, 2020: *

	\$ Amount
a. Ballot drop boxes	182561.90
b. Drive-through voting	250221.28
c. Personal protective equipment (PPE) for staff, poll workers, or voters	53226.66
d. Poll worker recruitment funds, hazard pay, and/or training expenses	514068.29
e. Polling place rental and cleaning expenses	
f. Temporary staffing support	

Exhibit "B"

g. Election department real estate costs, or costs associated with satellite election department office	417319.42
h. Vote-by-mail/Absentee voting equipment or supplies	28843.00
i. Election administration equipment	648856.42
j. Voting materials in languages other than English	
k. Non-partisan voter education	3367149.21

3. Total grant expenditures on sections 2a-2k: *

5462246.18

4. If your answers to question 1 and question 3 do not match, for what additional purposes were grant funds expended?

N/A There were no expenditures for additional purposes. We are requesting an extension (below question 6).

5. I certify that grant funds have only been expended for the public purpose of improving, administering and ensuring the safety of elections. *
☒ Yes
Your initials: *

WSL

If all the grant funds have not been expended, you may request a 6-month grant extension which will give you additional time to expend funds for the public purpose of improving and ensuring the safety of elections in 2021. If you request an extension, you'll be required to submit another grant report by July 31, 2021.

6. Are you interested in requesting a 6-month extension to your grant agreement in order to spend down your grant funds? *

- ☐ No, I do not need an extension.
- ☒ Yes, I would like to request a 6-month extension to my grant agreement.

7. What amount of grant funds has not been expended? *

1346731.76

Here's an opportunity to celebrate your accomplishments! What did you do with the CTCL COVID-19 Response grant funds that you're most proud of?

An addendum to follow with responses to these questions.

If your annual budget for elections permanently doubled, what would you be able to accomplish that you can't accomplish now?

An addendum to follow with responses to these questions.

Nowadays, election officials are expected to be experts on so many topics. Which challenges do you feel most prepared for? Which do you feel least prepared for?

An addendum to follow with responses to these questions.

Many of you asked to share photos of how you spent the grant funds. While this is completely optional, we welcome any photos (or other documents) you'd like to send our way!

Browse Files

Any other thoughts you'd like to share?

An addendum to follow with responses to these questions.

We love anecdotes, links to news articles about your grant spending, ideas for future CTCL programs, hearing what you love/hate about your job, etc. — anything else you want to tell us!

Once a month, we send out a newsletter called ELECTricity, which helps election officials stay current with election administration stories, technology, and best practices. We also send periodic updates about CTCL's trainings, resources, and tools. Would you like to receive this newsletter?

☒ Yes, I'd like to receive CTCL's newsletter.

Submit

Powered by JotForm

PUBLIC INTEREST

— LEGAL FOUNDATION —

VIA EMAIL AND CERTIFIED MAIL

May 18, 2021

Wendy S. Link
Palm Beach County Supervisor of Elections
240 S. Military Trail
West Palm Beach, FL 33415
wendylink@pbcelections.org

RE: Immediate Return of CTCL Funds

Dear Supervisor Link:

The Public Interest Legal Foundation (PILF) is a public interest law firm exclusively dedicated to election integrity. We write to you today on behalf of a client, a Florida registered voter, who is requesting that you disgorge funds as described below.

Background

In September 2020, your office received a grant award by the CTCL totaling \$6,808,977.94 “exclusively for the public purpose of planning and operationalizing safe and secure election in [your] county in 2020.” You were instructed that the funds could be spent for the CTCL’s acceptable categories of use upon receipt and until December 31, 2020.

According to your filed “CTCL COVID-19 Response Grant Report” in January 2021, your office reported that a total of \$1,346,731.76 or 20% of the funds you received were still held in public accounts. Your office asked for a 6-month extension to dispense with remaining monies.

Matters of Law

On May 6, 2021, Governor Ron DeSantis signed Senate Bill 90,¹ which amended various sections of Florida’s Election Code which, in part, marked a “prohibition on the use of private funds for election-related expenses.” Current law does not allow a supervisor of elections to “use” any donation in the form of money or “grants” from individuals or a “nongovernmental entity” like the CTCL for the purposes of “funding election-related expenses”. Therefore, the remaining unspent funds which you reported in January 2021 may no longer be used by your office, and to do so would violate current election law.

¹ FL Gov. Ron DeSantis; DeSantis Signs Bill to Safeguard the Sanctity of Florida Elections (May 6, 2021), <https://www.flgov.com/2021/05/06/governor-ron-desantis-signs-bill-to-safeguard-the-sanctity-of-florida-elections/>

Demands

Our client is demanding that your office immediately return all unspent CTCL funds to CTCL, a nongovernmental organization by 11:59pm local time Thursday, May 20, 2021. Records demonstrating that a wire transfer or other financial transaction was initiated before the deadline will resolve our client's demand.

In the event that all outstanding monies were spent during the aforementioned 6-month extension period provided by CTCL, and prior to May 6, 2021, please provide documents detailing the purposes of the expenditures and all dates of transactions.

We hope, on behalf of our client, that your office moves swiftly to disgorge all remaining CTCL monies before the deadline so litigation may be avoided.

Our client looks forward to your response.

Sincerely,

A handwritten signature in blue ink, appearing to read "Maureen Riordan", is centered on the page. The signature is fluid and cursive.

Maureen Riordan, PILF Litigation Counsel

Track Another Package +

Tracking Number: EJ661179732US

Remove X

Scheduled Delivery by

WEDNESDAY

19

MAY 2021 ⓘ

by

3:00pm ⓘ

 **Delivered**

May 20, 2021 at 11:55 am
WEST PALM BEACH, FL 33415

Feedback

Text & Email Updates	▼
Proof of Delivery	▼
Tracking History	▲
<div>May 20, 2021, 11:55 am</div> <div>Delivered</div> <div>WEST PALM BEACH, FL 33415</div> <div>Your item was delivered at 11:55 am on May 20, 2021 in WEST PALM BEACH, FL 33415. The item was signed for by J FELTON.</div>	

May 20, 2021, 10:39 am
Out for Delivery
WEST PALM BEACH, FL 33415

May 20, 2021, 10:28 am
Arrived at Post Office
WEST PALM BEACH, FL 33415

May 20, 2021, 8:50 am
Arrived at USPS Regional Destination Facility
WEST PALM BEACH FL DISTRIBUTION CENTER

May 18, 2021, 8:36 pm
Arrived at USPS Regional Origin Facility
INDIANAPOLIS IN DISTRIBUTION CENTER ANNEX

May 18, 2021, 6:58 pm
USPS in possession of item
INDIANAPOLIS, IN 46241

Feedback

Product Information



Postal Product: Priority Mail Express 1-Day®
Features: Money Back Guarantee
Insured
PO to Addressee
Up to \$100 insurance included. Restrictions Apply ⓘ

Signed for By: J FELTON // WEST PALM BEACH, FL 33415 // 11:55 am

See tracking for related item:
9590940266191028537150
(/go/TrackConfirmAction_input?tLabels=9590940266191028537150)

See Less ^

Can't find what you're looking for?



Wendy Sartory Link
Palm Beach County Supervisor of Elections
www.pbcelections.org

VIA EMAIL AND CERTIFIED MAIL

May 26, 2021

Maureen Riordan, Esq.
PILF Litigation Counsel
32 E. Washington St., Ste. 1675
Indianapolis, Indiana 46204

RE: Use and Return of CTCL Funds

Dear Attorney Riordan,

In September 2020, our office received a grant award from the Center for Tech and Civic Life ("CTCL"). The January 2021 report referenced in your correspondence does not reflect the total amount of grant money spent, but rather the amount of grant money expended as of that date. The next reporting deadline is at the end of June 2021, and will reflect expenditures from January to May 6, 2021. As of May 6, 2021, our office had not used the entirety of said grant money. The remaining funds remain in a trust account, held separate from other funds, as we await further direction from the Florida Department of State, Division of Elections and the CTCL.

On May 6, 2021, Governor Ron DeSantis signed Senate Bill 90, enacting into law a provision prohibiting the Supervisor of Elections from "solicit[ing], accept[ing], us[ing], or dispos[ing] of any donation in the form of money, grants, property, or personal services from an individual or a nongovernmental entity for the purpose of funding election-related expenses or voter education, voter outreach, or registration programs." Fla. Stat. Ann. § 97.0291.

The Supervisor of Elections has no legal obligation to immediately return outstanding funds to the CTCL. As previously stated, the funds in question remain separate from all others and will not be accessed until the Palm Beach County Supervisor of Election receives guidance from Department of State and the CTCL.

Sincerely,

Exhibit "E"

Wendy Sartory Link
Supervisor of Elections, Palm Beach County

IN THE CIRCUIT COURT OF THE
15TH JUDICIAL CIRCUIT IN AND FOR
PALM BEACH COUNTY, FLORIDA

GENERAL CIVIL DIVISION

CASE NO. _____

JAN TYLER,

Petitioner,

vs.

WENDY S. LINK, in her official
capacity as Supervisor of Elections
for Palm Beach County

Respondent.

_____/

**ALTERNATIVE WRIT OF MANDAMUS
(PROPOSED)**

WHEREAS by Petition filed in the name of Jan Tyler, it appears that Petitioner is entitled to have Respondent Wendy S. Link, as Palm Beach County Supervisor of Elections perform a ministerial duty and return all CTCL funds currently in Respondent's possession in accordance with Florida Statutes, 97.0291. As the Supervisor of Elections for Palm Beach County you owe a duty to Petitioner and must return all remaining funds to CTCL. Petitioner has requested that you perform these duties and you have failed to respond to Petitioner and continue to do so.

WHEREAS, a copy of the Petitioner's Petition for Alternative Writ is attached hereto and by reference is incorporated herein as though the same had been fully set forth herein.

NOW THEREFORE, this Court does command you, Wendy S. Link, Palm Beach County Supervisor of Elections to return all remaining funds in your

possession to CTCL and if there are no remaining funds in your possession to provide an accounting for their use, or that you appear before this Court on the ____ day of ____, __, in Chambers at ____, _Palm Beach County, Florida, at ____ o'clock, and then and there show cause why you refuse to return all remaining funds to CTCL a nongovernment organization in violation of Florida Statutes 97.0291.

DONE AND ORDERED in Chambers at ____, ____ County, Florida, this ____ day of ____, __.

Circuit Court Judge

[EXHIBITS OMITTED]