

**INFORMATION**

JD-CR-71 Rev. 11-18

STATE OF CONNECTICUT  
**SUPERIOR COURT**

Disposition date

Police Case number  
**2023-034039**

Agency name  
**State of CT-Division of Criminal Justice**

Agency number

**Title, Allegation and Counts**

State of Connecticut vs. (Name of accused)  
**Geter-Pataky, Wanda**

Residence (Town) of accused  
**Bridgeport**

Docket number

Address  
**LKA 93 Gurdon St. Bridgeport, CT 06606**

Date of birth  
**6/19/1956**

The undersigned Prosecuting Authority of the State of Connecticut charges that:

To be held at (Town)  
**Bridgeport**

Geographical area number  
**2**

Court date

Count One — Did commit the offense of:  
**Possession of Absentee Ballots**

Continued to

Purpose

Reason

At (Town)  
**Bridgeport**

On or about (Date)  
**8/10/2019**

In violation of General Statute number  
**9-140b(d)**

Count Two — Did commit the offense of:  
**Misrepresenting Eligibility Requirements for Voting by Absentee Ballot**

At (Town)  
**Bridgeport**

On or about (Date)  
**7/25/2019**

In violation of General Statute number  
**9-135(b)**

Count Three — Did commit the offense of:  
**Failure to Sign as an Assister on an Absentee Ballot Application**

At (Town)  
**Bridgeport**

On or about (Date)  
**7/25/2019**

In violation of General Statute number  
**9-140(a)**

See other sheet for additional counts

Date  
**5-29-2024**

Signed (Prosecuting Authority)  


**Court Action**

Defendant advised of rights before plea (Judge) (Date)

Bond Surety

10 % Election (Date)

Cash  CT  JY

Attorney  Public defender Guardian

Bond change

Seized property inventory number

Count	Plea date	Plea	Plea withdrawn		Verdict finding	Fine	Remit	Additional disposition
			Date	New plea				
1						\$	\$	
2						\$	\$	
3						\$	\$	

Date	Other Court Action	Judge

Receipt number

Cost  IMP  NCI

Bond information  Bond forfeited  Forfeiture vacated  Forfeiture vacated and bond reinstated

Application fee - receipt number if paid

Circle one W I Q

Program fee - receipt number if paid

Circle one W I Q

Probation fee - receipt number if paid

Circle one W I Q

Prosecutor on original disposition

Reporter/monitor on original disposition

Signed (Clerk)

Signed (Judge)



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STATE OF CONNECTICUT  
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**2023-034039**

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**State of CT-Division of Criminal Justice**


Agency number

Geographical area number  
**2**

**State of Connecticut vs. Geter-Pataky, Wanda**

**Additional Counts**

Count Four — Did commit the offense of:			Continued to	Purpose	Reason
<b>Tampering With a Witness</b>					
At (Town) <b>Bridgeport</b>	On or about (Date) <b>10/01/2019</b>	In violation of General Statute number <b>53a-151</b>			
Count Five — Did commit the offense of:					
At (Town)	On or about (Date)	In violation of General Statute number			
Count Six — Did commit the offense of:					
At (Town)	On or about (Date)	In violation of General Statute number			
Count Seven — Did commit the offense of:					
At (Town)	On or about (Date)	In violation of General Statute number			
Count Eight — Did commit the offense of:					
At (Town)	On or about (Date)	In violation of General Statute number			

Signed (Prosecuting Authority) 	Printed name of Prosecuting Authority <b>Kevin P. Lawlor, DCSA</b>	Date signed <b>5-29-2024</b>
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**Additional Court Action**

Count	Plea date	Plea	Plea withdrawn		Verdict finding	Fine	Remit	Additional disposition
			Date	New plea				
<b>4</b>						\$	\$	
<b>5</b>						\$	\$	
<b>6</b>						\$	\$	
<b>7</b>						\$	\$	
<b>8</b>						\$	\$	





**ARREST WARRANT APPLICATION**

JD-CR-64b Rev. 3-11  
 C.G.S. § 54-2a  
 P.B. §§ 36-1, 36-2, 36-3

**STATE OF CONNECTICUT  
 SUPERIOR COURT**  
 www.jud.ct.gov

For Court Use Only
Supporting Affidavits sealed
<input type="checkbox"/> Yes <input type="checkbox"/> No

Police Case number <b>2023-034039</b>	Agency name <b>State of CT-Division of Criminal Justice</b>	Agency number
Name (Last, First, Middle Initial) <b>Geter-Pataky, Wanda</b>	Residence (Town) of accused <b>Bridgeport</b>	Court to be held at (Town) <b>Bridgeport</b>
		Geographical Area number <b>2</b>

**Application For Arrest Warrant**

To: A Judge of the Superior Court

The undersigned hereby applies for a warrant for the arrest of the above-named accused on the basis of the facts set forth in the:  Affidavit Below.  Affidavit(s) Attached.

Date <b>5-29-2024</b>	Signed (Prosecuting authority) 	Type/print name of prosecuting authority <b>Kevin D. Lawlor, DCSA</b>
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**Affidavit**

The undersigned affiant, being duly sworn, deposes and says:

- The affiant, Police Inspector Scott Stevenson, is a regular sworn member of the State of Connecticut Division of Criminal Justice, and is currently assigned to the Office of the Chief State's Attorney (OCSA) in Rocky Hill. The affiant has over twenty-nine (29) years of police training and experience, and has conducted numerous investigations resulting in both the arrest and conviction of those persons involved. The facts and circumstances set forth below are from the affiant's personal investigative efforts, as well as information received from fellow law enforcement officers and allied investigators, acting in their official capacities.
- On 9/20/2019, Connecticut Secretary of the State Denise Merrill made a referral to the State of Connecticut State Elections Enforcement Unit (SEEC), regarding the 2019 Bridgeport Democratic Mayoral Primary ("Primary"). In her letter to SEEC, Secretary Merrill indicated that "...we are referring to your office certain allegations revealed by the citizens of Bridgeport during the Democratic Primary held on 9/10/2019. Statements by members of the public raise concerns that should be investigated. We have attached a relevant news article (from the CT Post) which appears to further identify specific allegations of impropriety." On 9/23/2019, SEEC convened a special meeting, voted to initiate an investigation, and approved the issuance of subpoenas to obtain evidence.
- In the ensuing months, the following investigative efforts were undertaken by SEEC to advance this investigation: the interviewing of several witnesses and potential respondents; the execution of subpoenas upon the Bridgeport Town Clerk and Registrar of Voters for relevant documents regarding the Primary, including all absentee ballot applications and ballot envelopes; the execution of subpoenas for security camera footage at Bridgeport residential buildings with historical absentee ballot activity, including the PT Barnum Housing & Harborview Towers. Based upon the findings of their investigation, SEEC referred to the Chief State's Attorney evidence bearing upon violation of the general statutes, pertaining to the Primary pursuant to C.G.S. 9-7b(8). SEEC investigators subsequently provided to the Statewide Prosecution Bureau within the Office of the Chief State's Attorney (OCSA) such evidence as it pertained to three named individuals, one of which was Wanda

*(This is page 1 of a 7 page Affidavit.)*

Date <b>5/29/2024</b>	Signed (Affiant)  #3372
Jurat Subscribed and sworn to before me on (Date) <b>5/29/2024</b>	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) 

**Finding**

The foregoing Application for an arrest warrant, and affidavit(s) attached to said Application, having been submitted to and considered by the undersigned, the undersigned finds from said affidavit(s) that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the arrest of the above-named accused.

Date and Signature 	Signed at (City or town) <b>Bridgeport</b>	Date <b>MAY 30 2024</b>	Signed (Judge/Judge Trial Referee) 	Name of Judge/Judge Trial Referee <b>DATTON, J.</b>
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**ARREST WARRANT APPLICATION**

JD-CR-64b Rev. 3-11  
C.G.S. § 54-2a  
P.B. §§ 36-1, 36-2, 36-3

**STATE OF CONNECTICUT  
SUPERIOR COURT**

www.jud.ct.gov

Name (Last, First, Middle Initial) <b>Geter-Pataky, Wanda</b>	Residence (Town) of accused <b>Bridgeport</b>	Court to be held at (Town) <b>Bridgeport</b>	Geographical Area number <b>2</b>
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**Affidavit - Continued**

Geter-Pataky (DOB 6/19/1956).

4. Following the SEEC investigation, on 6/01/2023 SEEC Staff Attorney Johnny Ross submitted a "Recommendation of Counsel" to SEEC Commissioners. The affiant reviewed this document, which enumerates three CT Election Law violations, alleged to be committed by Wanda Geter-Pataky, to wit:

**Allegation One:** Misrepresenting Eligibility Requirements for Voting by Absentee Ballot, in violation of C.G.S. 9-135(b). Citing April Keitt's witness statement in paragraph # 6 of this affidavit, Attorney Ross concluded that Geter-Pataky misrepresented the eligibility requirements for Keitt to vote by absentee ballot, as Geter-Pataky gave Keitt the impression she was eligible to vote via absentee ballot, even though Keitt was prepared to vote in person.

**Allegation Two:** Failure to Sign as an Assister on an Absentee Ballot, in violation of C.G.S. 9-140(a). Attorney Ross cited excerpts from April Keitt's witness statement and of Wanda Geter-Pataky's sworn deposition (p. 126) in support of the allegation, to wit:

Excerpts from April Keitt witness statement (paragraph # 6 of this affidavit): "Wanda Geter came to my house with a blank absentee ballot application. I have known Wanda Geter for ten years. Wanda told me to only sign the bottom of the blank application. She told me not to put the date on the application. I believe Wanda Geter helped me with the application by filling in the upper portion, but I did not see her write on this document. I signed the bottom of the application. I have done this with Wanda in previous elections and primaries over the past ten years."

Excerpts from Wanda Geter-Pataky deposition transcripts (p. 126):  
MS. GETER-PATAKY: Section 1.

MR. BURNS: Section 1.

MS. GETER-PATAKY: Section 2, 3 and 5.

MR. BURNS: Okay. So you filled out Sections 1, 2, 3, and 5 of April's absentee Page 8 of 13 ballot application?

MS. GETER-PATAKY: Uh-huh.

MR. BURNS: You did not fill out Section 4?

MS. GETER-PATAKY: This?

(This is page 2 of a 7 page Affidavit.)

Date <b>5/29/2024</b>	Signed (Affiant) <i>[Signature]</i> #3372
Jurat Subscribed and sworn to before me on (Date) <b>5/29/2024</b>	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <b>C. J. F. H.</b>
Reviewed (Prosecutorial Official) <i>[Signature]</i>	Date <b>5-29-2024</b>
Reviewed (Judge/Judge Trial Referee) <b>DAYTON, J.</b>	Date <b>MAY 30 2024</b>



**ARREST WARRANT APPLICATION**

JD-CR-64b Rev. 3-11  
C.G.S. § 54-2a  
P.B. §§ 36-1, 36-2, 36-3

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**Affidavit - Continued**

MR. BURNS: Section 4 is here, the reason.

MS. GETER-PATAKY: It says here 1, 2, 3, 4 -- yes.

MR. BURNS: So you filled out Section 4 as well?

MS. GETER-PATAKY: Yes.

MR. BURNS: Okay. And the signature, is that your signature at the bottom or Ms. Keitt's?

MS. GETER-PATAKY: Ms. Keitt's.

MR. BURNS: So she signed the bottom of that document?

MS. GETER-PATAKY: Absolutely.

MR. BURNS: Then at the bottom of that document, did you sign as an assister?

MS. GETER-PATAKY: No.


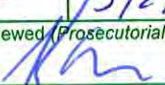
Attorney Ross concluded that Geter-Pataky assisted April Keitt by filling out sections 1-5 of Keitt's absentee ballot application, and failed to sign as an assister.

**Allegation Three:** *Illegal Possession of Absentee Ballot*, in violation of C.G.S. 9-140b(d). Citing April Keitt's witness statement in paragraph # 6 of this affidavit, Attorney Ross concluded that Geter-Pataky took possession of Keitt's official absentee ballot for the Primary, and that she was not authorized to do so under the statute.

5. On 11/30/2023, the affiant spoke with Ryan Burns, former Staff Attorney with SEEC's Enforcement Unit. Burns confirmed that he was part of the SEEC investigative team that looked into the Primary involving candidates Joseph Ganim and Marilyn Moore. Burns stated that a civil trial arose out of the Primary results, in which several persons testified. The affiant determined that this lawsuit was filed on 9/23/2019, entitled Beth Lazar, et al v. Joseph Ganim et al, docket number FBT-CV19-6090047-S. Burns stated that following the civil trial in October 2019, SEEC investigators reviewed trial witness testimony/transcripts, including testimony given by a witness, April Keitt of Bridgeport. SEEC also reviewed the names of the absentee ballot application circulators involved in the Primary, one of whom was identified as the accused, Wanda Geter-Pataky. Burns stated that both Keitt and Geter-Pataky were interviewed and/or deposed by SEEC during their investigation.

6. The affiant determined that April Keitt was interviewed by SEEC investigators on 10/24/2019, at which time she provided a witness statement that states, in relevant part, the following: "I was allowed to view the absentee

(This is page 3 of a 7 page Affidavit.)

Date <b>5/29/2024</b>	Signed (Affiant)  #3372
Jurat Subscribed and sworn to before me on (Date) <b>5/29/2024</b>	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <b>C. J. F. I. D.</b>
Reviewed (Prosecutorial Official) 	Date <b>5-29-2024</b>
Reviewed (Judge/Judge Trial Referee) <b>DAYTON, J.</b>	Date <b>MAY 30 2024</b>



**ARREST WARRANT APPLICATION**

JD-CR-64b Rev. 3-11  
C.G.S. § 54-2a  
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**Affidavit - Continued**

*ballot application in my name. I did not request this form. The handwriting in the upper portion is not mine. The signature at the bottom is mine. Wanda Geter came to my house with a blank absentee ballot application. I have known Wanda Geter for ten years. Wanda told me to only sign the bottom of the blank application. She told me not to put the date on the application. I believe Wanda Geter helped me with the application by filling in the upper portion, but I did not see her write on this document. I signed the bottom of the application. I have done this with Wanda in previous elections and primaries over the past ten years. I did receive an absentee ballot by mail. I marked my own ballot. No one else was present when I marked my ballot. I voted for Joe Ganim for Mayor. I put the marked ballot into the envelopes and did not seal it or put a stamp on it. I received numerous messages and calls from Wanda Geter via Facebook Messenger. She repeatedly asked me if my ballot came in. I ignored most of the messages and calls. I provide screen captures of the Facebook Messages to the investigators email address. On one occasion, when I spoke with Wanda, I told her I thought I should vote in person. Wanda said no, that she would come and pick up my absentee ballot. Wanda Geter arrived at my house one Saturday morning. Wanda asked for my ballot and told me not to seal the envelopes. I gave her the unsealed envelope containing my ballot. Subsequently, after she became aware that the CTPost had been asking questions about absentee ballots, Wanda did not tell me to avoid speaking about this matter, but she did tell me not to mention her name if I talked to anyone about this."*

7. The affiant also determined that Wanda Geter-Pataky was deposed by SEEC staff on 8/03/2021. The affiant obtained the transcript of that proceeding and learned the following:

That Geter-Pataky worked as a canvasser on Mayor Ganim's 2019 Democratic Mayoral Primary campaign. That she never received training on how to do that work, but she does have a lot of experience (p. 13); Geter-Pataky later clarifies that although the Ganim campaign didn't train her on how to circulate absentee ballot applications, she was, in fact, trained a long time ago (by another campaign) on the "do's and don'ts" (p. 35); That Geter-Pataky never trained anyone else on how to circulate absentee ballot applications (p. 76); That Geter-Pataky reached out to April Keitt after the (Primary) ballots went out (p. 91); That Geter-Pataky does not have Keitt's phone number, and the only way she has to get in touch with Keitt is to knock on her door (p. 92); That Geter-Pataky knocked on Keitt's door and was told by Keitt that she had received her absentee ballot and she was waiting for Geter-Pataky. That Keitt filled-out the ballot, Geter-Pataky gave Keitt a stamp and she (Geter-Pataky) left (p. 92); That Geter-Pataky and Keitt have known each other for 10-12 years, as Keitt's son was in Geter-Pataky's class when she worked in the school system, and they stayed in touch since then (p. 96); When questioned about filling out sections 1-5 on Keitt's absentee ballot application, Geter-Pataky admitted that she had done so, that it was her handwriting on Keitt's absentee ballot application, and that she (Geter-Pataky) had not signed the absentee ballot application as an assister (p. 125/126); That Geter-Pataky confirmed she had filled out sections 1, 2, 3, 4 & 5 of Keitt's absentee ballot application. When asked why she hadn't signed the bottom (of Keitt's absentee ballot application) as an assister, Geter-Pataky replied she didn't know. When asked if she signed as an assister for any application, Geter-Pataky stated yes she had, on some of them (p. 126/127); When asked if Keitt was going to be out of town on the day of the Primary, Geter-Pataky stated she believed she (Keitt) told her she was. When asked if Keitt has a disability, Geter-Pataky stated, "Not to

(This is page 4 of a 7 page Affidavit.)

Date <b>5/29/2024</b>	Signed (Affiant) <i>[Signature]</i> #3372
Jurat Subscribed and sworn to before me on (Date) <b>5/29/2024</b>	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <i>[Signature]</i>
Reviewed (Prosecutorial Official) <i>[Signature]</i>	Date <b>5-29-2024</b>
Reviewed (Judge/Judge Trial Referee) <b>DAYTON, J.</b>	Date <b>MAY 30 2024</b>



**ARREST WARRANT APPLICATION**

JD-CR-64b Rev. 3-11  
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P.B. §§ 36-1, 36-2, 36-3

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**Affidavit - Continued**

my knowledge” (p. 127); When confronted that Keitt alleged Geter-Pataky had taken her completed ballot from her in the unsealed envelope, Geter-Pataky stated “No she did not. Nope.” (p. 129).

8. The affiant reviewed a copy of April Keitt's absentee ballot application for the Primary, dated 7/25/2019. Section VII of the application is titled Declaration of Person Providing Assistance (Completed by any person who assists with completion of application). The affiant notes that Section VII is blank/not filled-in.

9. The affiant notes that SEEC investigators queried the Connecticut Voter Registration System (CVRS) and determined that April Keitt's absentee ballot was not tabulated in the Primary.


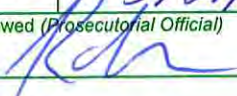
10. On 3/13/2024 and again on 4/08/2024, the affiant made contact with and spoke with April Keitt at her Bridgeport residence. Note that both interactions were documented via body-worn camera. Keitt reviewed a copy of the witness statement she provided to SEEC investigators on 10/24/2019, as detailed in paragraph # 6 of this affidavit. Keitt stated that her statement was the truth in its entirety and she offered no changes to be made. When asked if there was any reason that prevented her from going to her polling location to vote in person for the Primary, Keitt stated flatly, “No.” Keitt also confirmed that she has known Geter-Pataky for years, even pre-dating “...the whole voting thing.” The affiant then showed Keitt Geter-Pataky's current DMV photo, whereupon she immediately and positively identified this as Wanda. Keitt signed/dated the back of that photo to indicate same.

11. That C.G.S. 9-140b(d), **POSSESSION OF BALLOTS AND ENVELOPES RESTRICTED**, reads, as follows: *No person shall have in his possession any official absentee ballot or ballot envelope for use at any primary, election or referendum except the applicant to whom it was issued, the Secretary of the State or his or her authorized agents, any official printer of absentee ballot forms and his designated carriers, the United States Postal Service, any other carrier, courier or messenger service recognized and approved by the Secretary of the State, any person authorized by a municipal clerk to receive and process official absentee ballot forms on behalf of the municipal clerk, any authorized primary, election or referendum official or any other person authorized by any provision of the general statutes to possess a ballot or ballot envelope.*

As detailed in paragraph # 6 of this affidavit, April Keitt received an absentee ballot by mail, which she filled out on her own and placed into the envelopes without sealing or stamping same. Keitt then received numerous messages and calls from Wanda Geter-Pataky, repeatedly asking Keitt if her ballot had arrived. Keitt stated that on one occasion while speaking with Geter-Pataky, she told her she thought she should vote in person, to which Geter-Pataky replied no, that she would come and pick up Keitt's absentee ballot. Geter-Pataky arrived at Keitt's home, asked for her ballot and told her not to seal the envelopes. Keitt subsequently gave her unsealed envelope containing her ballot to Geter-Pataky. As detailed in paragraph # 7 of this affidavit, Geter-Pataky denies having taken possession of Keitt's ballot.

12. That C.G.S. 9-135(b), **MISREPRESENTING ELIGIBILITY REQUIREMENTS FOR VOTING BY**

(This is page 5 of a 7 page Affidavit.)

Date <b>5/29/2024</b>	Signed (Affiant) 
Jurat Subscribed and sworn to before me on (Date) <b>5/29/2024</b>	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <b>C. I. F. H.</b>
Reviewed (Prosecutorial Official) 	Date <b>5-29-2024</b>
Reviewed (Judge/Judge Trial Referee) <b>DAYTON, J.</b>	Date <b>MAY 30 2024</b>



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**Affidavit - Continued**

**ABSENTEE BALLOT**, reads, in pertinent part, as follows: *Any elector eligible to vote at a primary or an election and any person eligible to vote at a referendum may vote by absentee ballot if such elector or person is unable to appear at such elector's or person's polling place on the day of such primary, election or referendum for any of the following reasons: (1) Such elector's or person's active service with the armed forces of the United States; (2) such elector's or person's absence from the town of such elector's or person's voting residence; (3) sickness; (4) physical disability; (5) the tenets of such elector's or person's religion forbid secular activity on the day of such primary, election or referendum; or (6) the required performance of such elector's or person's duties as a primary, election or referendum official, including as a town clerk or registrar of voters or as staff of the clerk or registrar, at a polling place other than such elector's or person's own during all of the hours of voting at such primary, election or referendum.*

**(b) No person shall misrepresent the eligibility requirements for voting by absentee ballot prescribed in subsection (a) of this section, to any elector or prospective absentee ballot applicant.** (Emphasis added)

As detailed in paragraph # 6 of this affidavit, April Keitt did not request an absentee ballot application. Rather, Wanda Geter-Pataky brought a blank absentee ballot application to Keitt's home and instructed her to sign the bottom of the application and omit the date. Keitt stated that on one occasion while speaking with Geter-Pataky, she told her she thought she should vote in person, to which Geter-Pataky replied no, that she would come and pick up Keitt's absentee ballot. When asked by the affiant on 3/13/2024, whether there was any reason that prevented her from going to her polling location to vote in person for the Primary, Keitt stated flatly, "No."

Further, as detailed in paragraph # 7 of this affidavit, when questioned by SEEC investigators during her deposition on 8/03/2021, Geter-Pataky admitted that she had filled out sections 1-5 on Keitt's absentee ballot application, and that it was her handwriting on Keitt's absentee ballot application. Section 4 of the absentee ballot application is the "Statement of Applicant," which states the following: *"I the undersigned applicant believe that I am, or will be, eligible to vote at the election, primary or referendum indicated above and that I expect to be unable to appear at the polling place during the hours of voting for the reason below: (check only one).* The affiant notes that the box indicating "My absence from town during all hours of voting" is checked off.

13. That C.G.S. 9-140(a), **FAILURE TO SIGN AS ASSISTER ON AN ABSENTEE BALLOT APPLICATION**, reads, in pertinent part, as follows: *Any person who assists another person in the completion of an application shall, in the space provided, sign the application and print or type his name, residence address and telephone number. Such signature shall be made under the penalties of false statement in absentee balloting.*

As detailed in paragraph # 6 of this affidavit, Wanda Geter-Pataky brought a blank absentee ballot application to April Keitt who, in turn, only signed it. Also, upon viewing same during her SEEC interview, Keitt stated that the handwriting on the upper portion of her absentee ballot application was not hers. That Keitt's absentee ballot application was clearly received and processed by the Bridgeport Town Clerk's Office, as she subsequently received an absentee ballot in the mail.

(This is page 6 of a 7 page Affidavit.)

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Jurat Subscribed and sworn to before me on (Date) <b>5/29/2024</b>	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <b>C. J. F. Jr.</b>
Reviewed (Prosecutorial Official) <i>[Signature]</i>	Date <b>5-29-2024</b>
Reviewed (Judge/Judge Trial Referee) <b>DAYTON, J.</b>	Date <b>MAY 30 2024</b>



**ARREST WARRANT APPLICATION**

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**Affidavit - Continued**

Further, as detailed in paragraph # 7 of this affidavit, when questioned by SEEC investigators during her deposition on 8/03/2021, Geter-Pataky admitted that she had filled out sections 1-5 on Keitt's absentee ballot application, that it was her handwriting on Keitt's absentee ballot application, and that she had not signed Keitt's absentee ballot application as an assister.

14. That C.G.S. 53a-151, **TAMPERING WITH A WITNESS**, reads as follows: *A person is guilty of tampering with a witness if, believing that an official proceeding is pending or about to be instituted, he induces or attempts to induce a witness to testify falsely, withhold testimony, elude legal process summoning him to testify or absent himself from any official proceeding.*

As detailed in paragraph # 6 of this affidavit, in her sworn statement to SEEC investigators on 10/24/2019, April Kett stated the following about Wanda Geter-Pataky: *"Subsequently, after she became aware that the CTPost had been asking questions about absentee ballots, Wanda did not tell me to avoid speaking about this matter, but she did tell me not to mention her name if I talked to anyone about this."*

15. Therefore, based upon the facts and circumstances contained herein, the affiant believes that probable cause has been established and requests that an arrest warrant be issued for Wanda Geter-Pataky (DOB 6/19/1956), charging her with the following: Possession of Absentee Ballots, in violation of C.G.S. 9-140b(d); Misrepresenting Eligibility Requirements for Voting by Absentee Ballot, in violation of C.G.S. 9-135(b); Failure to Sign as an Assister on an Absentee Ballot Application, in violation of C.G.S. 9-140(a); and Tampering With a Witness, in violation of C.G.S. 53a-151. Pursuant to section 9-359, said willful violations of Chapter 145 of the Connecticut General Statutes are class D felonies.

(This is page 7 of a 7 page Affidavit.)

Date <b>5/09/2024</b>	Signed (Affiant)  #3372
Jurat Subscribed and sworn to before me on (Date) <b>5/29/2024</b>	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <b>C. I. F. A.</b>
Reviewed (Prosecutorial Official) 	Date <b>5-29-2024</b>
Reviewed (Judge/Judge Trial Referee) <b>DAYTON, J.</b>	Date <b>MAY 30 2024</b>