



February 13, 2020

**The Honorable Dave Yost**  
Ohio Attorney General  
30 E. Broad Street, 17<sup>th</sup> Floor  
Columbus, Ohio 43215

**CC:**

The Honorable Frank LaRose, Ohio Secretary Of State  
Charles E. Coulson, Prosecuting Attorney, Lake County, Ohio  
Julie Pfeiffer, Assistant Section Chief for Constitutional Law Section, Ohio Attorney General's Office

**Re: Possible election law violation**

Dear Attorney General Yost,

Secretary of State Frank LaRose recently notified you that he had "identified 10 individuals who appear to have voted in Ohio after casting a ballot in a different state in the same election." In his letter, LaRose underscored the importance of "consistent enforcement of the laws governing our voting processes." This complaint provides information regarding Hillary O'Connor Mueri (AKA Hillary Ann O'Connor AKA Hillary Keiser) who also appears to have cast a ballot in the same election in Ohio and another state, in violation of Ohio law. Therefore, we urge you to investigate the facts detailed below and take appropriate action if prosecution is warranted.

**Statement Of Facts:**

A review of available public records from the Lake County, Ohio Board of Elections and the San Diego County (California) Registrar of Voters indicates that Hillary O'Connor Mueri (AKA Hillary Ann O'Connor AKA Hillary Keiser) (DOB: 04/23/1977) voted in the following elections:

- California: February 5, 2008 Presidential Primary Election
- Ohio: March 4, 2008 Primary Election

California: November 4, 2008 Presidential General Election

- On January 11, 2006, Hillary A. O'Connor, heretofore Hillary O'Connor Mueri, signed a sworn "Registration and Absentee Ballot Request" which she submitted under penalty of perjury to the state of Ohio (Exhibit 1) that established her in-state voter residency at 7315 Khristopher Ct., Concord, OH 44077.
- On April 23, 2007, under penalty of perjury, Hillary A. O'Connor submitted a "Voter Registration Form" to the state of California (Exhibit 2) from that established her in-state voter residency at 2165 Caminito Leonzio, Unit 24, Chula Vista, CA 91915. In this form, she also declared "Yes" to the question "Have You Ever Been Registered To Vote?" and listed 7315 Khristopher Ct., OH 44077 as the street address for where she was registered.

- On February 5, 2008, records from the San Diego County Registrar of Voters (Exhibit 3) show that O'Connor Mueri voted in California's Presidential Primary election on said date.
- On March 4, 2008, records from the Lake County Board of Elections show that O'Connor Mueri (Exhibit 4) show that O'Connor Mueri cast an absentee ballot in Ohio's Democratic primary election on said date.
- On November 4, 2008, records from the San Diego County Registrar of Voters (Exhibit 3) show that O'Connor Mueri voted in California's Presidential General election on said date.

**Analysis:**

O'Connor Mueri's conduct appears to be in violation of Ohio law. Under Ohio Rev. Code § 3599.12(A)(1), it is a felony in the fourth degree to "[v]ote or attempt to vote in any primary, special, or general election in a precinct in which that person is not a legally qualified elector..." In order to be a qualified Ohio elector, Ohio Rev. Code § 3503.01(A) requires that individual must have "been a resident of the state thirty days immediately preceding the election at which the citizen offers to vote, is a resident of the county and precinct in which the citizen offers to vote, and has been registered to vote for thirty days." Furthermore, Ohio law explicitly states that, "[i]f a person goes into another state and while there exercises the right of a citizen by voting, the person shall be considered to have lost the person's residence in this state." Ohio Rev. Code § 3503.02(H). Based on the facts detailed above, O'Connor Mueri does not appear to be a qualified Ohio elector when she cast a ballot in Ohio's March 4, 2008 presidential primary. By voting in California on February 5, 2008, O'Connor Mueri lost her residence in the state of Ohio as of that date. Therefore, when she cast an absentee ballot in Ohio's March 4, 2008 presidential primary 28 days later, she could not have met the requirement to have been a resident of the state for the immediate 30-day period prior to the election.

Furthermore, Ohio Rev. Code 3599.12 (A)(2) states no personal shall vote or attempt to vote more than once at the same election by any means. As evidence shows, O'Connor Mueri voted in the California presidential primary election and the Ohio primary election in 2008. O'Connor Mueri voted twice in a primary election period.

I urge you to examine the evidence presented, and if you determine that Ms. O'Connor Mueri violated the law, refer this matter to the appropriate prosecution. Thank you for your prompt attention to this matter.

Sincerely,



Rob Secaur  
Executive Director, Ohio Republican Party