

companies in which it has invested, the performance of those investments, and the ownership and financial structure of your funds.

Over the last two decades, the election technology industry has become highly concentrated, with a handful of consolidated vendors controlling the vast majority of the market. In the early 2000s, almost twenty vendors competed in the election technology market.⁴ Today, three large vendors—Election Systems & Software, Dominion, and Hart InterCivic—collectively provide voting machines and software that facilitate voting for over 90% of all eligible voters in the United States.⁵ Private equity firms reportedly own or control each of these vendors, with very limited “information available in the public domain about their operations and financial performance.”⁶ While experts estimate that the total revenue for election technology vendors is about \$300 million, there is no publicly available information on how much those vendors dedicate to research and development, maintenance of voting systems, or profits and executive compensation.⁷

Concentration in the election technology market and the fact that vendors are often “more seasoned in voting machine and technical services contract negotiations” than local election officials, give these companies incredible power in their negotiations with local and state governments. As a result, jurisdictions are often caught in expensive agreements in which the same vendor both sells or leases, and repairs and maintains voting systems—leaving local officials dependent on the vendor, and the vendor with little incentive to substantially overhaul and improve its products.⁸ In fact, the Election Assistance Commission (EAC), the primary federal body responsible for developing voluntary guidance on voting technology standards, advises state and local officials to consider “the cost to purchase or lease, operate, and maintain a voting system over its life span ... [and to] know how the vendor(s) plan to be profitable” when signing contracts, because vendors typically make their profits by ensuring “that they will be around to maintain it after the sale.” The EAC has warned election officials that “[i]f you do not manage the vendors, they will manage you.”⁹

Election security experts have noted for years that our nation’s election systems and infrastructure are under serious threat. In January 2017, the U.S. Department of Homeland Security designated the United States’ election infrastructure as “critical infrastructure” in order to prioritize the protection of our elections and to more effectively assist state and local election

⁴ Bloomberg, “Private Equity Controls the Gatekeepers of American Democracy,” Anders Melin and Reade Pickert, November 3, 2018, <https://www.bloomberg.com/news/articles/2018-11-03/private-equity-controls-the-gatekeepers-of-american-democracy>.

⁵ Penn Wharton Public Policy Initiative, “The Business of Voting,” July 2018, <https://publicpolicy.wharton.upenn.edu/live/files/270-the-business-of-voting>.

⁶ Id.

⁷ Id.

⁸ Brennan Center for Justice, “America’s Voting Machines at Risk,” Lawrence Norden and Christopher Famighetti, 2015, https://www.brennancenter.org/sites/default/files/publications/Americas_Voting_Machines_At_Risk.pdf; Penn Wharton Public Policy Initiative, “The Business of Voting,” July 2018, <https://publicpolicy.wharton.upenn.edu/live/files/270-the-business-of-voting>.

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officials in addressing these risks.¹⁰ However, voting machines are reportedly falling apart across the country, as vendors neglect to innovate and improve important voting systems, putting our elections at avoidable and increased risk.¹¹ In 2015, election officials in at least 31 states, representing approximately 40 million registered voters, reported that their voting machines needed to be updated, with almost every state “using some machines that are no longer manufactured.”¹² Moreover, even when state and local officials work on replacing antiquated machines, many continue to “run on old software that will soon be outdated and more vulnerable to hackers.”¹³

In 2018 alone “voters in South Carolina [were] reporting machines that switched their votes after they’d inputted them, scanners [were] rejecting paper ballots in Missouri, and busted machines [were] causing long lines in Indiana.”¹⁴ In addition, researchers recently uncovered previously undisclosed vulnerabilities in “nearly three dozen backend election systems in 10 states.”¹⁵ And, just this year, after the Democratic candidate’s electronic tally showed he received an improbable 164 votes out of 55,000 cast in a Pennsylvania state judicial election in 2019, the county’s Republican Chairwoman said, “[n]othing went right on Election Day. Everything went wrong. That’s a problem.”¹⁶ These problems threaten the integrity of our elections and demonstrate the importance of election systems that are strong, durable, and not vulnerable to attack.

Staple Street reportedly owns or has had investments in Dominion, a major election technology vendor. In order to help us understand your firm’s role in this sector, we ask that you provide answers to the following questions no later than December 20, 2019.

1. Please provide the disclosure documents and information enumerated in Sections 501 and 503 of the *Stop Wall Street Looting Act*.¹⁷
2. Which election technology companies, including all affiliates or related entities, does Staple Street have a stake in or own? Please provide the name of and a brief description of the services each company provides.

¹⁰ Department of Homeland Security, “Statement by Secretary Jeh Johnson on the Designation of Election Infrastructure as a Critical Infrastructure Subsector,” January 6, 2017,

<https://www.dhs.gov/news/2017/01/06/statement-secretary-johnson-designation-election-infrastructure-critical>.

¹¹ AP News, “US election integrity depends on security-challenged firms,” Frank Bajak, October 29, 2018, <https://apnews.com/f6876669cb6b4e4c9850844f8e015b4c>; Penn Wharton Public Policy Initiative, “The Business of Voting,” July 2018, <https://publicpolicy.wharton.upenn.edu/live/files/270-the-business-of-voting>.

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¹³ Associated Press, “AP Exclusive: New election systems use vulnerable software,” Tami Abdollah, July 13, 2019, <https://apnews.com/e5e070c31f3c497fa9e6875f426ccde1>.

¹⁴ Vice, “Here’s Why All the Voting Machines Are Broken and the Lines Are Extremely Long,” Jason Koebler and Matthew Gault, November 6, 2018, https://www.vice.com/en_us/article/59vzgn/heres-why-all-the-voting-machines-are-broken-and-the-lines-are-extremely-long.

¹⁵ Vice, “Exclusive: Critical U.S. Election Systems Have Been Left Exposed Online Despite Official Denials,” Kim Zetter, August 8, 2019, https://www.vice.com/en_us/article/3kxzk9/exclusive-critical-us-election-systems-have-been-left-exposed-online-despite-official-denials.

¹⁶ New York Times, “A Pennsylvania Country’s Election Day Nightmare Underscores Voting Machine Concerns,” Nick Corasaniti, November 30, 2019, <https://www.nytimes.com/2019/11/30/us/politics/pennsylvania-voting-machines.html>.

¹⁷ Stop Wall Street Looting Act, S.2155, <https://www.congress.gov/bill/116th-congress/senate-bill/2155>.

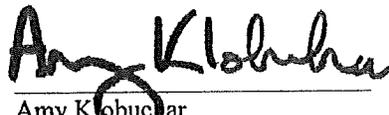
- a. Which election technology companies, including all affiliates or related entities, has Staple Street had a stake in or owned in the past twenty years? Please provide the name of and a brief description of the services each company provides or provided.
 - b. For each election technology company Staple Street had a stake in or owned in the past twenty years, including all affiliates or related entities, please provide the following information for each year that the firm has had a stake in or owned this company and the five years preceding the firm's investment.
 - i. The name of the company
 - ii. Ownership stake
 - iii. Total revenue
 - iv. Net income
 - v. Percentage of revenue dedicated to research and development
 - vi. Total number of employees
 - vii. A list of all state and local jurisdictions with which the company has a contract to provide election related products or services
 - viii. Other private-equity firms that own a stake in the company
3. Has any election technology company, including all affiliates or related entities, in which Staple Street has an ownership stake or has had an ownership stake in the last twenty years, been found to have been in noncompliance with the EAC's Voluntary Voting System Guidelines? If so, please provide a copy of each EAC noncompliance notice received by the company and a description of what steps the company took to resolve each issue.
 4. Has any election technology company, including all affiliates or related entities, in which Staple Street has an ownership stake or has had an ownership stake in the last twenty years, been found to have been in noncompliance with any state or local voting system guidelines or practices? If so, please provide a list of all such instances and a description of what steps the company took to resolve each issue.
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Thank you for your attention to this matter.

Sincerely,


Elizabeth Warren
United States Senator


Amy Klobuchar
United States Senator


Ron Wyden
United States Senator


Mark Pocan
Member of Congress

Declaration of Russell James Ramsland, Jr.

1. My name is Russell James Ramsland, Jr., and I am a resident of Dallas County, Texas. I make this declaration pursuant to 28 USC sec 1746. I am over 18 years of age. I hold an MBA from Harvard University, and a political science degree from Duke University. I have worked with the National Aeronautics and Space Administration (NASA) and the Massachusetts Institute of Technology (MIT), among other organizations, and have run businesses all over the world, many of which are highly technical in nature. I have served on technical government panels.
2. I am part of the management team of Allied Security Operations Group, LLC, (ASOG). ASOG is a group of globally engaged professionals who come from various disciplines to include Department of Defense, Secret Service, Department of Homeland Security, and the Central Intelligence Agency. It provides a range of security services, but has a particular emphasis on cybersecurity, open source investigation and penetration testing of networks. We employ a wide variety of cyber and cyber forensic analysts. We have patents pending in a variety of applications from novel network security applications to SCADA (Supervisory Control and Data Acquisition) protection and safe browsing solutions for the dark and deep web. For this report, I have relied on these experts and resources.
3. In November 2018, ASOG analyzed audit logs for the central tabulation server of the ES&S Election Management System (EMS) for the Dallas, Texas, General Election of 2018. Our team was surprised at the enormous number of error messages that should not have been there. They numbered in the thousands, and the operator ignored and overrode all of them. This led to various legal challenges in that election, and we provided evidence and analysis in some of them.
4. As a result, ASOG initiated an 18-month study into the major EMS providers in the United States, among which is Election Systems and Software ("ES&S") that provides EMS services for Wisconsin. We did thorough background research of the literature and discovered there is confirmed evidence from both Democrat and Republican stakeholders in the vulnerability of ES&S. Next, we began doing passive penetration testing into the vulnerabilities described in the literature and confirmed for ourselves that in many cases, past vulnerabilities already identified were still left open to exploit in the November 2020 elections. We also noticed a striking similarity between the approach to software and EMS systems of ES&S and Dominion. This was logical since they share a common ancestry in the Diebold voting system.
5. Over the past three decades, almost all of the states have shifted from a relatively low-technology format to a high-technology format that relies heavily on a handful of private services companies. These private companies supply the hardware and software, often handle voter registrations, hold the voter records, partially manage the elections, program counting the votes and report the outcomes. Wisconsin is one of those states.

6. These systems contain a large number of known vulnerabilities to hacking and tampering, both when voters express their voting intention by marking an electronic ballot using ballot marking devices (BMDs), and at the back end where the votes are stored, tabulated, and reported by election officials. These vulnerabilities are well known, and experts in the field have written extensively about them. This is not surprising as there are no federal standards for security in voting system software. EAC 2.0 was to be written to address this issue, but was never done.

7. Below is a screenshot from the ES&S Security Test Report Electionware 5.2.1.0 – 8/28/17 – Freeman, Craft, McGregor Group. It shows an incredible number of vulnerabilities in the system by which inside and external threats can manipulate the outcomes in a variety of ways.

Electionware Servers	
Missing Operating System Patches	
Critical	17
Important	49
Moderate	2
Unrated	8

SCA Patching results	
Windows 2008 R2 STIG ³	46
Firewall STIG Configuration	3
.NET Framework 4 STIG Configuration	2
Internet Explorer 9 STIG Configuration	13

Electionware Clients	
Missing Operating System Patches	
Critical	24
Important	51
Moderate	1
Unrated	9

SCA Patching results	
Windows 7 STIG	51
Firewall STIG Configuration	3
.NET Framework 4 STIG Configuration	2
Internet Explorer 9 STIG Configuration	3
Windows 7 USGCB ⁴ Configuration	45
Firewall USGCB Configuration	8

Recently ES&S moved many of its systems into the cloud behind cloudflare, but ASOG determined that this protection can still be easily circumvented by gaining access through its FTP site ESSVotes.

7. Election Systems and Software (“ES&S”) is a privately held company that provides election technologies and services to government jurisdictions. Almost all the counties of Wisconsin use the ES&S Election Management System with the exception of Sheboygan County. ES&S systems have options to be an electronic, paperless voting system with no permanent record of the voter’s choices, or a paper ballot-based system or hybrid of those two.

9. The overwhelming vulnerabilities of the ES&S system were on full display in Dallas County where ES&S is used, during the 2020 General Election. Data has been provided by the Dallas County Election Department. The Voter Registration Database was received October 13, 2020 following an Open Records Request by The Dallas Examiner. The Mail-In and Early Voting Rosters were downloaded daily from the County's computers. All Texas counties are required by law to publish daily voting rosters.

10. In that election, the voter records during early voting were captured each day for those voters who cast ballots either in person or by mail-in and catalogued using the hash totals to provide an absolute unique identifier. As required by state law, the Dallas County Elections Department published the Daily Vote Roster for all voters who cast ballots during Absentee and In-Person Early Voting. The Roster contained the VoterID, name, address, type of vote, and various dates associated with every Early-Voting vote cast.

Dallas County claims its source of roster data was the In-Person Electronic Poll Books, and the Absentee Ballot scanners. Dallas County has claimed that entry into the Vote Roster can only be done by a registered Dallas County voter who either appeared In-Person or by Absentee Ballot. The computer that generated the roster was apparently hacked between October 7 and October 30. During that period tens of thousands of vote records were purged, added, or edited from the ES&S generated Vote Roster.

Specifically, over this period, 56,974 voter records had their hash identifier changed, meaning the vote was tampered with after it was cast and recorded in the system. In most cases, this tampering took the form of purging the vote, and then re-constituting it in some form or fashion, but with a change in the hash total meaning the vote was somehow changed. Currently it appears 5,690 votes disappeared completely after voting in person. All in all, this translates into approximately 107,000 hacked votes in Dallas County alone for ES&S. Ten blocks of voters on Westminster Street in Highland Park had their votes purged and then some of them were selectively re-instated at a later date with changes. People who double voted were catalogued as well as dead people who voted, people with no VUID voted (approximately 800 of them), unregistered university students voted, and *people living abroad who claim a Dallas Residence for voting purposes, but who, in a spot check are unknown to the residences they list* in the ES&S system. A short list of them includes:

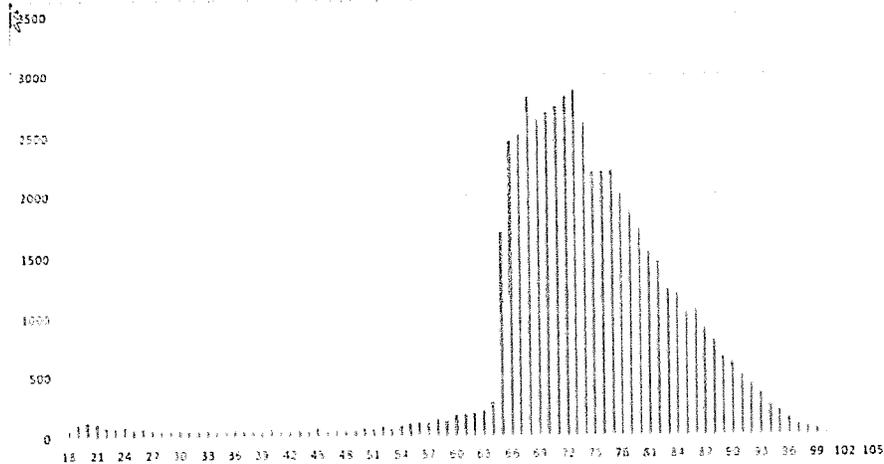
<u>Country</u>	<u>Voters Who Voted</u>
Mexico	118
Guatemala	9
Nicaragua	4
Kenya	18
Canada	154
Ireland	34
China	62
Australia	105

In plain English, at the instant before a voter casts a ballot there is a one-to-one relationship between the voter and their ballot as well as a one-to-one association between the voter and their votes.

At the instant that ballot is cast, the one-to-one relationship between the voter and ballot still exist, but the relationship between the voter and their votes is gone. No one can know how they voted. The key security check on voting integrity is the absolute match between the number of voters in the Vote Roster and the number of ballots counted in that voting district or precinct. If these numbers do not match, either physical ballots were added or removed from the Ballot Counter or "voters" were added or removed from the Vote Roster. In either case, the election has been compromised and the election is nothing more than a lottery. With tens of thousands of Vote Roster entries purged and other tens of thousand of entries apparently created out of thin air, using the ES&S EMS system, Dallas County Elections Department is definitely in the lottery business.

11. Equally troubling with the ES&S System is the apparent ease of targeting within the system of certain groups for purging. In Dallas, over 92% of PURGED In-Person and Absentee voters were over 65. This is statistically impossible and makes clear the system is easily manipulated by inside or outside actors.

Who Purged the Baby Boomers?



Purged Voters by Age Source: Dallas County Election Department Vote Rosters Oct 7-Oct 30

12. My colleagues and I at ASOG have studied the information that is publicly available concerning the November 3, 2020, election results from Wisconsin. Based on the significant anomalies and red flags that we have observed, I believe to a reasonable degree of professional certainty that election results have been

years? Please provide the name of and a brief description of the services each company provides or provided.

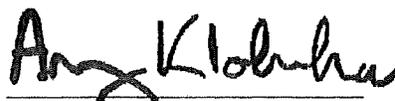
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Sincerely,


Elizabeth Warren
United States Senator


Amy Klobuchar
United States Senator


Ron Wyden
United States Senator


Mark Pocan
Member of Congress

Congress of the United States

Washington, DC 20510

December 6, 2019

Stephen D. Owens
Managing Director
Staple Street Capital Group, LLC

Hootan Yaghoobzadeh
Managing Director
Staple Street Capital Group, LLC

Dear Messrs. Owens and Yaghoobzadeh:

We are writing to request information regarding Staple Street Capital Group, LLC's (Staple Street) investment in Dominion Voting System (Dominion) one of three election technology vendors responsible for developing, manufacturing and maintaining the vast majority of voting machines and software in the United States, and to request information about your firm's structure and finances as it relates to this company.

Some private equity funds operate under a model where they purchase controlling interests in companies and implement drastic cost-cutting measures at the expense of consumers, workers, communities, and taxpayers. Recent examples include Toys "R" Us and Shopko.¹ For that reason, we have concerns about the spread and effect of private equity investment in many sectors of the economy, including the election technology industry—an integral part of our nation's democratic process. We are particularly concerned that secretive and "trouble-plagued companies,"² owned by private equity firms and responsible for manufacturing and maintaining voting machines and other election administration equipment, "have long skimmed on security in favor of convenience," leaving voting systems across the country "prone to security problems."³ In light of these concerns, we request that you provide information about your firm, the portfolio

¹ Atlantic, "The Demise of Toys 'R' Us Is a Warning," Bryce Covert, July/August 2018 issue, <https://www.theatlantic.com/magazine/archive/2018/07/toys-r-us-bankruptcy-private-equity/561758/>; Axios, "How workers suffered from Shopko's bankruptcy while Sun Capital made money," Dan Primack, "How workers suffered from Shopko's bankruptcy while Sun Capital made money," June 11, 2019, <https://www.axios.com/shopko-bankruptcy-sun-capital-547b97ba-901c-4201-92cc-6d3168357fa3.html>.

² ProPublica, "The Market for Voting Machines Is Broken. This Company Has Thrived in It," Jessica Huseman, October 28, 2019, <https://www.propublica.org/article/the-market-for-voting-machines-is-broken-this-company-has-thrived-in-it>.

³ Associated Press News, "US Election Integrity Depends on Security-Challenged Firms," Frank Bajak, October 28, 2019, <https://apnews.com/f6876669cb6b4e4c9850844f8e015b4c>.

companies in which it has invested, the performance of those investments, and the ownership and financial structure of your funds.

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Concentration in the election technology market and the fact that vendors are often “more seasoned in voting machine and technical services contract negotiations” than local election officials, give these companies incredible power in their negotiations with local and state governments. As a result, jurisdictions are often caught in expensive agreements in which the same vendor both sells or leases, and repairs and maintains voting systems—leaving local officials dependent on the vendor, and the vendor with little incentive to substantially overhaul and improve its products.⁸ In fact, the Election Assistance Commission (EAC), the primary federal body responsible for developing voluntary guidance on voting technology standards, advises state and local officials to consider “the cost to purchase or lease, operate, and maintain a voting system over its life span ... [and to] know how the vendor(s) plan to be profitable” when signing contracts, because vendors typically make their profits by ensuring “that they will be around to maintain it after the sale.” The EAC has warned election officials that “[i]f you do not manage the vendors, they will manage you.”⁹

Election security experts have noted for years that our nation’s election systems and infrastructure are under serious threat. In January 2017, the U.S. Department of Homeland Security designated the United States’ election infrastructure as “critical infrastructure” in order to prioritize the protection of our elections and to more effectively assist state and local election

⁴ Bloomberg, “Private Equity Controls the Gatekeepers of American Democracy,” Anders Melin and Reade Pickert, November 3, 2018, <https://www.bloomberg.com/news/articles/2018-11-03/private-equity-controls-the-gatekeepers-of-american-democracy>.

⁵ Penn Wharton Public Policy Initiative, “The Business of Voting,” July 2018, <https://publicpolicy.wharton.upenn.edu/live/files/270-the-business-of-voting>.

⁶ Id.

⁷ Id.

⁸ Brennan Center for Justice, “America’s Voting Machines at Risk,” Lawrence Norden and Christopher Famighetti, 2015, https://www.brennancenter.org/sites/default/files/publications/Americas_Voting_Machines_At_Risk.pdf; Penn Wharton Public Policy Initiative, “The Business of Voting,” July 2018, <https://publicpolicy.wharton.upenn.edu/live/files/270-the-business-of-voting>.

⁹ U.S. Election Assistance Commission, “Ten Things to Know About Selecting a Voting System,” October 14, 2017, <https://www.eac.gov/documents/2017/10/14/ten-things-to-know-about-selecting-a-voting-system-cybersecurity-voting-systems-voting-technology/>.

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⁹ U.S. Election Assistance Commission, “Ten Things to Know About Selecting a Voting System,” October 14, 2017, <https://www.eac.gov/documents/2017/10/14/ten-things-to-know-about-selecting-a-voting-system-cybersecurity-voting-systems-voting-technology/>.

officials in addressing these risks.¹⁰ However, voting machines are reportedly falling apart across the country, as vendors neglect to innovate and improve important voting systems, putting our elections at avoidable and increased risk.¹¹ In 2015, election officials in at least 31 states, representing approximately 40 million registered voters, reported that their voting machines needed to be updated, with almost every state “using some machines that are no longer manufactured.”¹² Moreover, even when state and local officials work on replacing antiquated machines, many continue to “run on old software that will soon be outdated and more vulnerable to hackers.”¹³

In 2018 alone “voters in South Carolina [were] reporting machines that switched their votes after they’d inputted them, scanners [were] rejecting paper ballots in Missouri, and busted machines [were] causing long lines in Indiana.”¹⁴ In addition, researchers recently uncovered previously undisclosed vulnerabilities in “nearly three dozen backend election systems in 10 states.”¹⁵ And, just this year, after the Democratic candidate’s electronic tally showed he received an improbable 164 votes out of 55,000 cast in a Pennsylvania state judicial election in 2019, the county’s Republican Chairwoman said, “[n]othing went right on Election Day. Everything went wrong. That’s a problem.”¹⁶ These problems threaten the integrity of our elections and demonstrate the importance of election systems that are strong, durable, and not vulnerable to attack.

Staple Street reportedly owns or has had investments in Dominion, a major election technology vendor. In order to help us understand your firm’s role in this sector, we ask that you provide answers to the following questions no later than December 20, 2019.

1. Please provide the disclosure documents and information enumerated in Sections 501 and 503 of the *Stop Wall Street Looting Act*.¹⁷
2. Which election technology companies, including all affiliates or related entities, does Staple Street have a stake in or own? Please provide the name of and a brief description of the services each company provides.

¹⁰ Department of Homeland Security, “Statement by Secretary Jeh Johnson on the Designation of Election Infrastructure as a Critical Infrastructure Subsector,” January 6, 2017, <https://www.dhs.gov/news/2017/01/06/statement-secretary-johnson-designation-election-infrastructure-critical>.

¹¹ AP News, “US election integrity depends on security-challenged firms,” Frank Bajak, October 29, 2018, <https://apnews.com/f6876669cb6b4e4c9850844f8e015b4c>; Penn Wharton Public Policy Initiative, “The Business of Voting,” July 2018, <https://publicpolicy.wharton.upenn.edu/live/files/270-the-business-of-voting>.

¹² Brennan Center for Justice, “America’s Voting Machines at Risk,” Lawrence Norden and Christopher Famighetti, 2015, https://www.brennancenter.org/sites/default/files/publications/Americas_Voting_Machines_At_Risk.pdf.

¹³ Associated Press, “AP Exclusive: New election systems use vulnerable software,” Tami Abdollah, July 13, 2019, <https://apnews.com/e5e070c31f3c497fa9e6875f426ccde1>.

¹⁴ Vice, “Here’s Why All the Voting Machines Are Broken and the Lines Are Extremely Long,” Jason Koebler and Matthew Gault, November 6, 2018, https://www.vice.com/en_us/article/59vzgn/heres-why-all-the-voting-machines-are-broken-and-the-lines-are-extremely-long.

¹⁵ Vice, “Exclusive: Critical U.S. Election Systems Have Been Left Exposed Online Despite Official Denials,” Kim Zetter, August 8, 2019, https://www.vice.com/en_us/article/3kxzk9/exclusive-critical-us-election-systems-have-been-left-exposed-online-despite-official-denials.

¹⁶ New York Times, “A Pennsylvania Country’s Election Day Nightmare Underscores Voting Machine Concerns,” Nick Corasaniti, November 30, 2019, <https://www.nytimes.com/2019/11/30/us/politics/pennsylvania-voting-machines.html>.

¹⁷ Stop Wall Street Looting Act, S.2155, <https://www.congress.gov/bill/116th-congress/senate-bill/2155>.

- a. Which election technology companies, including all affiliates or related entities, has Staple Street had a stake in or owned in the past twenty years? Please provide the name of and a brief description of the services each company provides or provided.
 - b. For each election technology company Staple Street had a stake in or owned in the past twenty years, including all affiliates or related entities, please provide the following information for each year that the firm has had a stake in or owned this company and the five years preceding the firm's investment.
 - i. The name of the company
 - ii. Ownership stake
 - iii. Total revenue
 - iv. Net income
 - v. Percentage of revenue dedicated to research and development
 - vi. Total number of employees
 - vii. A list of all state and local jurisdictions with which the company has a contract to provide election related products or services
 - viii. Other private-equity firms that own a stake in the company
3. Has any election technology company, including all affiliates or related entities, in which Staple Street has an ownership stake or has had an ownership stake in the last twenty years, been found to have been in noncompliance with the EAC's Voluntary Voting System Guidelines? If so, please provide a copy of each EAC noncompliance notice received by the company and a description of what steps the company took to resolve each issue.
 4. Has any election technology company, including all affiliates or related entities, in which Staple Street has an ownership stake or has had an ownership stake in the last twenty years, been found to have been in noncompliance with any state or local voting system guidelines or practices? If so, please provide a list of all such instances and a description of what steps the company took to resolve each issue.
 5. Has any election technology company, including all affiliates or related entities, in which Staple Street has an ownership stake or has had an ownership stake in the last twenty years, been found to have violated any federal or state laws or regulations? If so, please provide a complete list, including the date and description, of all such violations.
 6. Has any election technology company, including all affiliates or related entities, in which Staple Street has an ownership stake or has had an ownership stake in the last twenty years, reached a settlement with any federal or state law enforcement entity related to a potential violation of any federal or state laws or regulations? If so, please provide a complete list, including the date and description, of all such settlements.

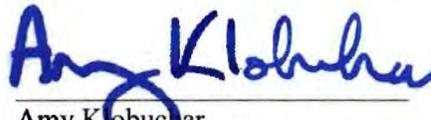
7. Has any election technology company, including all affiliates or related entities, in which Staple Street has an ownership stake or has had an ownership stake in the past twenty years, reached a settlement with any state or local jurisdiction related to a potential violation of or breach of contract? If so, please provide a complete list, including the date and description, of all such settlements.

Thank you for your attention to this matter.

Sincerely,



Elizabeth Warren
United States Senator



Amy Klobuchar
United States Senator



Ron Wyden
United States Senator



Mark Pocan
Member of Congress

JOINT CYBERSECURITY ADVISORY



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Product ID: AA20-304A

October 30, 2020

Iranian Advanced Persistent Threat Actor Identified Obtaining Voter Registration Data

SUMMARY

This advisory uses the MITRE Adversarial Tactics, Techniques, and Common Knowledge (ATT&CK®) framework. See the [ATT&CK for Enterprise](#) framework for all referenced threat actor techniques.

TECHNICAL DETAILS

Active Scanning: Vulnerability Scanning

Exploit Public-Facing

M (hereinafter, "propaganda video")

To report suspicious or criminal activity related to information found in this Joint Cybersecurity Advisory, contact your local FBI field office at www.fbi.gov/contact-us/field, or the FBI's 24/7 Cyber Watch (CyWatch) at (855) 292-3937 or by e-mail at CyWatch@fbi.gov. When available, please include the following information regarding the incident: date, time, and location of the incident; type of activity; number of people affected; type of equipment used for the activity; the name of the submitting company or organization; and a designated point of contact. To request incident response resources or technical assistance related to these threats, contact CISA at Central@cisa.dhs.gov.

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Application _____ d d r dr r r r
r r d r d d r

d r r r d rr r d
r r d r d r d R r r rr rd
r r rd r d d dr r d
r d d

d d d
r r d rd r d r r

r's d d targeting of U.S. elections' infrastructure (*Compromise*

Infrastructure _____ r r ddr d r - d
r r r r r d - rr r r

Gather Victim Host Information _____ d r r

Reconnaissance

r d r d r d D d r
r d d r r Search Open Websites and Domains _____
rd r d r D d URLs with the words "vote" or "voter" and
"registration" d d r R r r d

- R
- M d r r
- D r
-

Acunetix Scanning

's analysis d d r
r r d r Active Scanning: Vulnerability Scanning

r d r r d
/registration/registration/details d r

```
/registration/registration/details?addresscity=-1 or 3*2<(0+5+513-513) --  
&addressstreet1=xxxxx&btnbeginregistration=begin voter  
registration&btnnextelectionworkerinfo=next&btnnextpersonalinfo=next&btnnextresde  
tails=next&btnnextvoterinformation=next&btnsubmit=submit&chkageverno=on&chkagever  
yes=on&chkcitizenno=on&chkcitizenyes=on&chkdisabledvoter=on&chkelectionworker=on&  
chkresprivate=1&chkstatecancel=on&dlnumber=1&dob=xxxx/x/x&email=sample@email.tst&
```

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```
firstname=xxxxx&gender=radio&hdnaddresscity=&hdngender=&last4ssn=xxxxx&lastname=x  
xxxxinjjeuee&mailaddresscountry=sample@xxx.xxx&mailaddressline1=sample@email.tst&  
mailaddressline2=sample@xxx.xxx&mailaddressline3=sample@xxx.xxx&mailaddressstate=  
aa&mailaddresszip=sample@xxxx.xxx&mailaddresszipex=sample@xxx.xxx&middlelname=xxxx  
x&overseas=1&partycode=a&phoneno1=xxx-xxx-xxxx&phoneno2=xxx-xxx-  
xxxx&radio=consent&statecancelcity=xxxxxxx&statecancelcountry=usa&statecancelstat  
e=XXaa&statecancelzip=xxxxx&statecancelzipext=xxxxx&suffixname=esq&txtmailaddress  
city=sample@xxx.xxx
```

Requests

```
                r      d                r      d  
2020-09-26 13:12:56 x.x.x.x GET /x/x v[$acunetix]=1 443 - x.x.x.x  
Mozilla/5.0+(Windows+NT+6.1;+WOW64)+AppleWebKit/537.21+(KHTML,+like+Gecko)+Chrome/41.  
0.2228.0+Safari/537.21 - 200 0 0 0
```

```
2020-09-26 13:13:19 X.X.x.x GET /x/x voterid[$acunetix]=1 443 - x.x.x.x  
Mozilla/5.0+(Windows+NT+6.1;+WOW64)+AppleWebKit/537.21+(KHTML,+like+Gecko)+Chrome/41.  
0.2228.0+Safari/537.21 - 200 0 0 1375
```

```
2020-09-26 13:13:18 .X.x.x GET /x/x voterid=:print(md5(acunetix_wvs_security_test));  
443 - X.X.x.x
```

User Agents Observed

```
                d                r      d                r      d  
Mozilla/5.0+(Windows+NT+6.1;+WOW64)+AppleWebKit/537.21+(KHTML,+like+Gecko)+Chrome  
/41.0.2228.0+Safari/537.21 - 500 0 0 0
```

```
Mozilla/5.0+(X11;+U;+Linux+x86_64;+en-  
US;+rv:1.9b4)+Gecko/2008031318+Firefox/3.0b4
```

```
Mozilla/5.0+(X11;+U;+Linux+i686;+en-  
US;+rv:1.8.1.17)+Gecko/20080922+Ubuntu/7.10+(gutsy)+Firefox/2.0.0.17
```

Exfiltration

Obtaining Voter Registration Data

```
                r      r      r      rd                d  
                R      d DM      r      d      r      r      r      d  
rr      r      d                rr d      r      d      r  
d      r      d                d      r      dr d      d      r      r      r      r
```

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d dr r r r Gather Victim Identity
Information _____ r rd d d r r
r d r d d

Requests

r d r

```
2020-10-17 13:07:51 x.x.x.x GET /x/x voterid=XXXX1 443 - x.x.x.x curl/7.55.1 - 200 0 0 1406
```

```
2020-10-17 13:07:55 x.x.x.x GET /x/x voterid=XXXX2 443 - x.x.x.x curl/7.55.1 - 200 0 0 1390
```

```
2020-10-17 13:07:58 x.x.x.x GET /x/x voterid=XXXX3 443 - x.x.x.x curl/7.55.1 - 200 0 0 1625
```

```
2020-10-17 13:08:00 x.x.x.x GET /x/x voterid=XXXX4 443 - x.x.x.x curl/7.55.1 - 200 0 0 1390
```

Note r voterid cs_uri_query field

User Agents

d r d r

FDM+3.x

curl/7.55.1

```
Mozilla/5.0+(Windows+NT+6.1;+WOW64)+AppleWebKit/537.21+(KHTML,+like+Gecko)+Chrome/41.0.2228.0+Safari/537.21 - 500 0 0 0
```

```
Mozilla/5.0+(X11;+U;+Linux+x86_64;+en-US;+rv:1.9b4)+Gecko/2008031318+Firefox/3.0b4
```

r r timeline of the actor's

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TECHNICAL FINDINGS

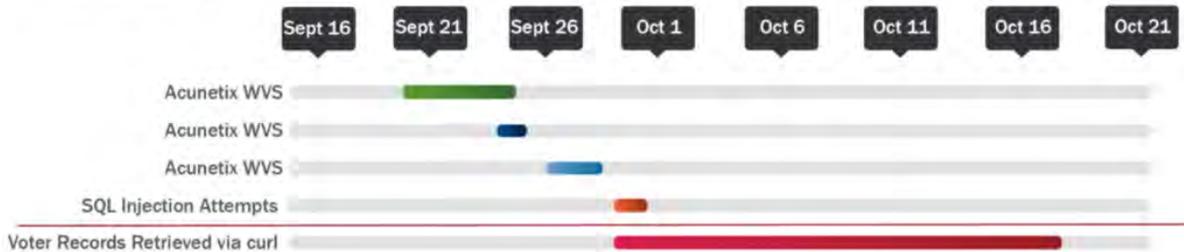


Figure 1: Overview of malicious activity

MITIGATIONS

Detection

Acunetix Scanning

r d rd
r r

- \$acunetix
- acunetix_wvs_security_test

Indicators of Compromise

r d d [Redacted]

Disclaimer Many of the IP addresses included below likely correspond to publicly available VPN services, which can be used by individuals all over the world. Although this creates the potential for false positives, any activity listed should warrant further investigation. The actor likely uses various IP addresses and VPN services.

d

-
- d R r
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- R r
- R r
- R r
- R r
- R r
- R r
- R r
- R r

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dd D d r d
r rd r rr d dd

Scan web applications for SQL injection and other common web vulnerabilities

r r r r
r r r r r r r d d
r r r d r r r r d d
r d r d d d d r r r

Deploy a web application firewall

D r r d d r d d r
d dr r r d r r d r
d r r d d dd r

Deploy techniques to protect against web shells

r r r d
d d dr r M r r d
— r r d r —on a victim's web server M
r r r r r d r r
r d r r dd r d
d d d r r d r
r d r

Use multi-factor authentication for administrator accounts

r r r r d r r d
rd d r d r d r d r
r r rd d r r r

_____ "D d r r d d r r r"

_____ r rr d r d d

_____ "D" r r r D d r M r"

_____ d d D D R

_____ M R D

_____ r d d d r r r

_____ d

_____ " r r M r " r d

_____ d r r r r r r r d

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JOINT CYBERSECURITY ADVISORY

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R R

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Declaration of [REDACTED] Ph.D

November 30, 2020

Pursuant to 28 U.S.C Section 1746, I, [REDACTED], make the following declaration.

1. I am over the age of 21 years and I am under no legal disability, which would prevent me from giving this declaration.
2. [REDACTED] has a Ph.D in Electrical Engineering from the University of California at Davis and a Masters degree in Mathematics from the University of California at Berkeley. I have been employed, for over 28 years, in the signal processing and wireless signal processing domain, with an emphasis on statistical signal processing. I have published numerous journal and conference articles. Additionally, I have held Top Secret and SAP clearances and I am an inventor of nearly 30 patents, one of which has over 1000 citations in the field of MIMO communications (Multiple Input Multiple Output).
3. I reside at [REDACTED].
4. Given the data sources referenced in this document, I assert that in Georgia, Pennsylvania and the city of Milwaukee, a simple statistical model of vote fraud is a better fit to the sudden jump in Biden vote percentages among absentee ballots received later in the counting process of the 2020 presidential election. It is also a better fit when constrained to a single large Metropolitan area such as Milwaukee..
5. Given the same data sources, I also assert that Milwaukee precincts exhibit statistical anomalies that are not normally present in fair elections.. The fraud model hypothesis in Milwaukee has a posterior probability of 100% to machine precision. This model predicts 105,639 fraudulent Biden ballots in Milwaukee.
6. I assert that the data suggests aberrant statistical anomalies in the vote counts in Michigan, when observed as a function of time.

Signature:

Supporting evidence for the assertions in (4) and 5 is provided in the following pages.

1 Impact of Fraud on the Election

In the analysis that follows, it is possible to obtain rough estimates on how vote fraud could possibly have effected the election. In Georgia, there is evidence that votes were actually switched from Trump to Biden. As many as 51,110 Biden votes were fraudulent and as many as 51,110 votes could be added to Trump. An audit to determine vote switching will be more difficult, since it is likely the Trump ballots have been destroyed in Georgia, based on reports of ballots being shredded there. If instead we presume that Bidens fraudulent votes were simply added to the totals, then we estimate that 104,107 ballots should be removed from Biden's totals.

In Pennsylvania, from just one batch of absentee ballots, approximately 72668 of them are estimated to be fraudulent Biden votes. Our analysis of Milwaukee shows that 105,639 Biden ballots could be fraudulent. Moreover there is evidence of vote switching here, which might give as many as 42365 additional ballots to Trump, and remove the same from Biden.

Michigan yields an estimate of 237,140 fraudulent Biden votes added to the total, using conservative estimates of the Biden percentage among the new ballots.

2 Statistical Model

The simplest statistical model for computing the probabilities for an election outcome is a binomial distribution, which assigns a probability p for a given person within the population to select a candidate. If we assume that each person chooses their candidate independently, then we obtain the Binomial distribution in the form,

$$P(k|N) \equiv {}_N C_k p^k (1-p)^{N-k}, \quad (1)$$

where $P(k|N)$ is the probability that you observe k votes for a candidate in a population of N voters, and where ${}_N C_k$ is the number of ways to choose k people out of a group of N people.

For larger N , the binomial distribution can be approximated by a Gaussian distribution, which is used in the election fraud analysis in [1]. The chief reason for this is the difficulty of computing $P(k|N)$ for large N and k . However this problem can be overcome by computing the probabilities in the log domain and using the log beta function to compute ${}_N C_k$.

For this analysis it is more useful to compute the probabilities as a function of f the observed fraction of the candidate's votes. In this formulation we have $k = Nf$, and $N - k = N(1 - f)$, and therefore we define the fractional probability as,

$$B_N(f) \equiv {}_N C_{Nf} p^{Nf} (1-p)^{N(1-f)}. \quad (2)$$

2.1 Fraud Model

To model voting fraud we assume a fixed fraction α of votes are given to the cheater. The pool of available voters who actually voted is now $N(1 - \alpha)$. The fraction who actually voted for the cheater is given by $f - \alpha$. The probability that the fraction f voters reported for the cheater, with the fraction α stolen, can therefore be written as,

$$C_{N,\alpha}(f) \equiv B_{N(1-\alpha)}(f - \alpha). \quad (3)$$

This is similar to the fraud model used in the election fraud analysis given in [1]. We use the Binomial distribution directly, rather than the Gaussian distribution, since it should be more accurate for small N, k or f .

2.2 Posterior Probability of Fraud Model

A hypothesis test can now be set up between the standard voting statistics of (2) vs the statistics of the fraud model (3). If we use Bayesian inference we can compute an estimate of the posterior probability of the fraud model. This can be written as,

$$P(F|f) = \frac{C_{N,\alpha}(f)p_F}{C_{N,\alpha}(f)p_F + B_N(f)(1 - p_F)},$$

where p_F is the prior probability of fraud. In our investigation we assume fraud is unlikely and set $p_F = 0.01$.

3 Analysis of Absentee Ballots in the 2020 Election

For this analysis we extracted data from the `all_states_timeseries.csv` file, which can be found at the internet url: <https://wiki.audittheelection.com/index.php/Datasets>. We look at the absentee ballot results near the beginning of the time series and then compare it to the end or the middle of the period, after a sufficient enough ballots were added.

For the models in Section 2 we assign the probability p of a Biden vote using the final data. This assumption is actually more favorable to the cheater. As mentioned earlier we set the prior probability of fraud to $p_F = 0.01$, and the cheating fraction, α , is set to $\alpha = f - p$, where f is the observed Biden fraction in the newly added ballots. This isolates the statistics of the added ballots from the final observed statistics.

We focus on the absentee ballots, because they are dominated by large democratic cities and there is no obvious reason why those statistics should change appreciably over time. Furthermore it should be noted that the start time for this data, mid day Nov. 4., was well after some of the larger absentee ballot dumps occurred.

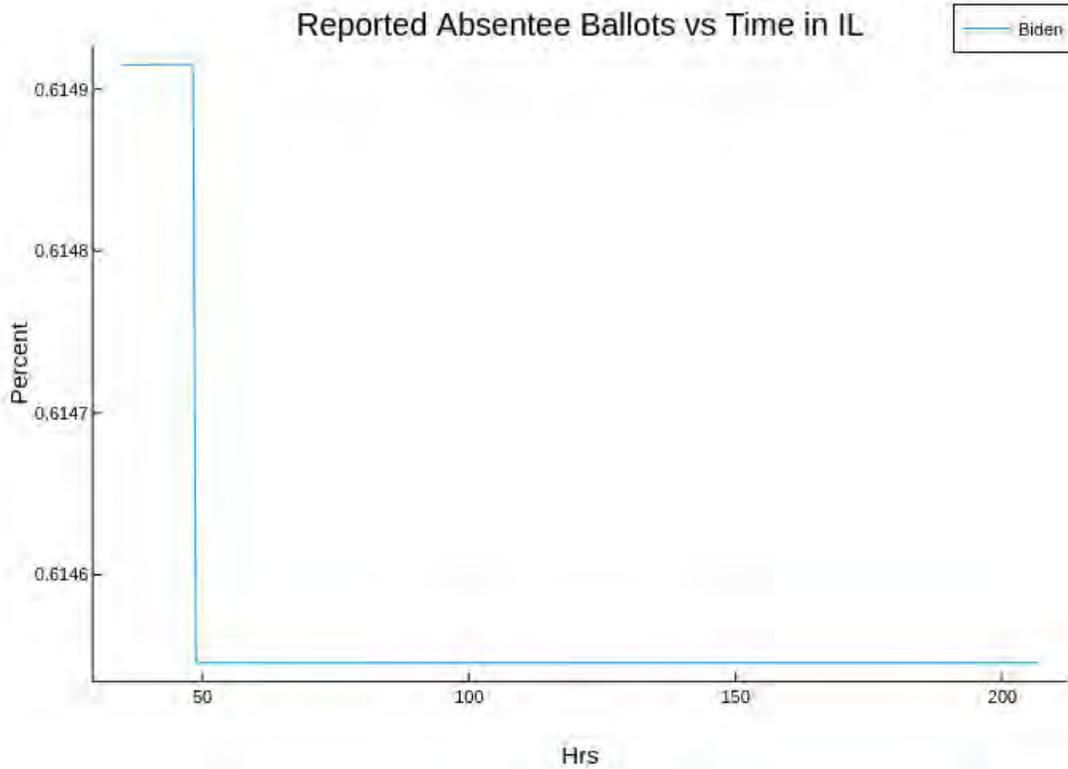


Figure 1: Reported Biden Fraction In Illinois vs Time

3.1 Control Case Illinois

We choose Illinois as a control case, since it has a significant number of absentee ballots that were counted later and provides a fairly clean baseline. The reported Biden fraction vs time is given in Figure 1.

As we can see there is not much change in the Biden statistics from the initial 601,714 absentee ballots when compared with the 54,117 ballots that were added. This is further shown by the bar chart in Figure 2.

Using our formula for the posterior probability of fraud in (3) we obtain the probability that the fraud model is correct of 6.5%. This lends good support to the idea that the Illinois absentee ballots were counted fairly.

3.2 Analysis of Georgia Absentee Ballots

The Georgia absentee ballot count started at 3,701,005 and 303,988 ballots were added. The Biden fraction among absentee ballots as a function of time is shown in Figure (3). This plot shows a statistical abnormality in that the

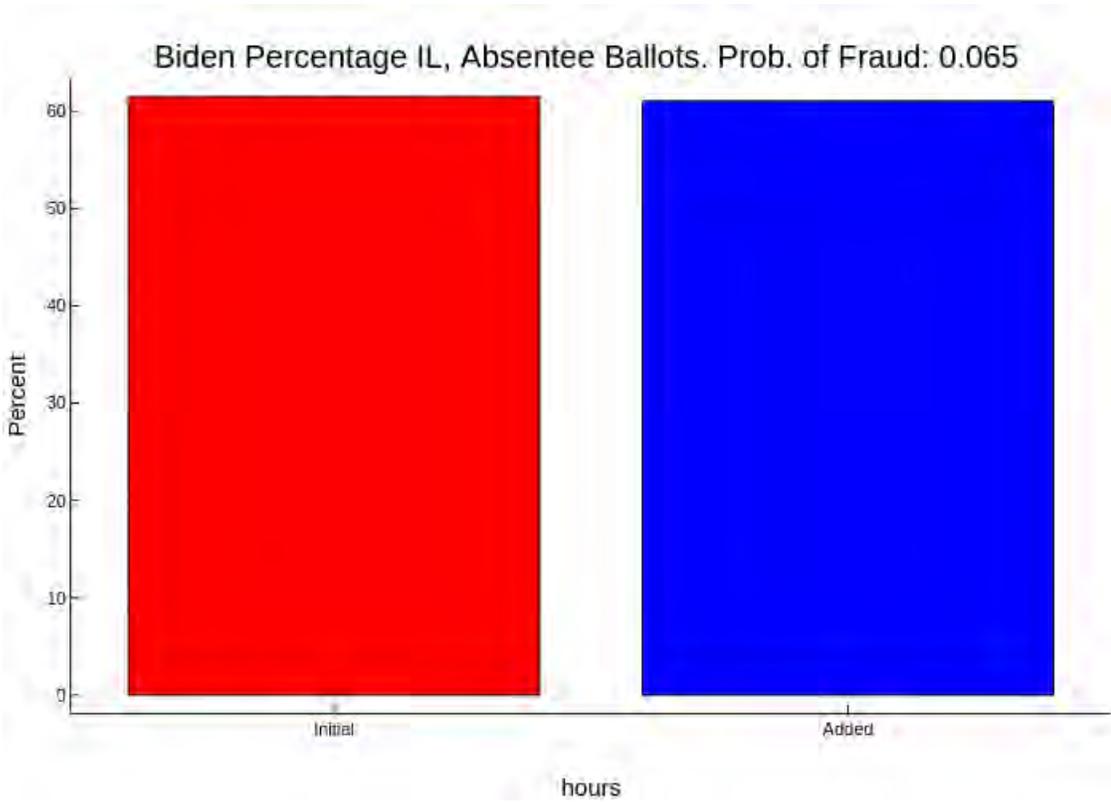


Figure 2: Before and Added Biden Fraction

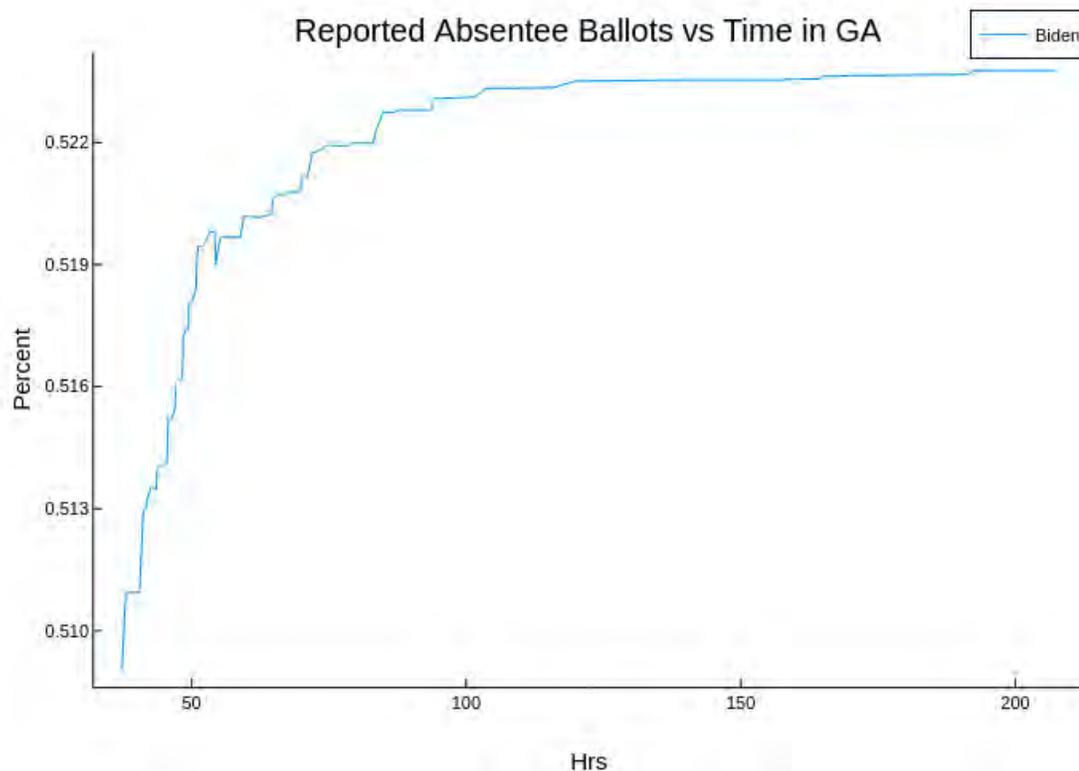


Figure 3: Georgia Absentee Ballots vs Time: (Biden Fraction)

Biden fraction appears to always be increasing. This is statistically unlikely and is not typically seen in fair elections. Normally you would see a mixture of votes of Biden and his opponents, and would see random deviation around the asymptote.

We investigate this phenomenon more fully in Figure (4). The added ballots have a Biden percentage of around 70%, while the initial statistics were at 50%. This is a very large jump for such a large sample size and seems very unlikely. Indeed the probability that the fraud model is correct is 100%, up to the precision of double floating point arithmetic.

Assuming that the prior absentee ballot distribution is the correct one, we can form a simple prediction for how many of Biden's ballots were fraudulent. Let $N_1 = 303,988$, the number of ballots added, and let $B = 189,497$ be the number of Biden votes in this new batch. If the fraction of Biden votes should actually be $f = 0.509$. Let x be the proposed number of fraudulent Biden votes,

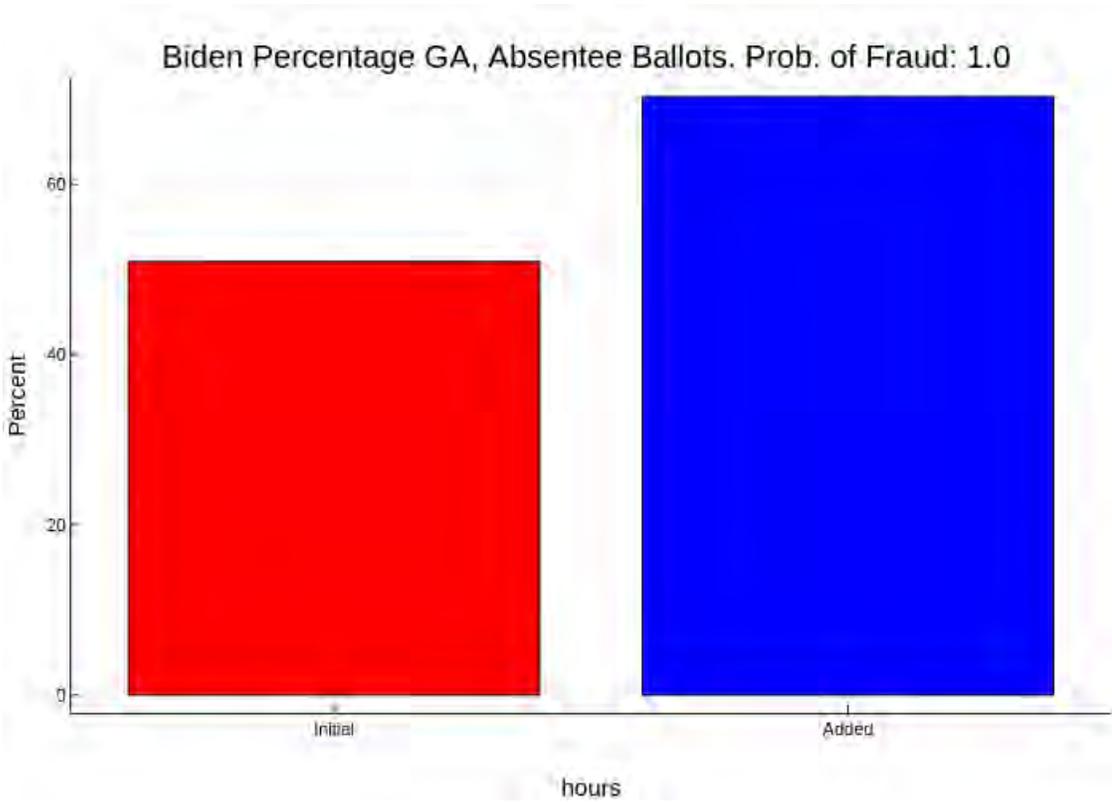


Figure 4: Before and After Biden Fraction in Georgia

then we have,

$$\begin{aligned}\frac{B-x}{N_1-x} &= f \\ x &= \frac{B-N_1f}{1-f}.\end{aligned}\tag{4}$$

In the case that votes were actually switched from Trump to Biden, then the formula becomes,

$$\begin{aligned}\frac{B-x}{N_1} &= f \\ x &= B - N_1f\end{aligned}$$

This would suggest that 104,107 ballots were fraudulently manufactured for Biden. If we presume that actually those ballots were switched from Trump to Biden then as many as 19% of the new absentee ballots for Biden were fraudulent, which totals around 51,110 ballots that should be removed from Biden's totals and added to Trump. We shall see in Section 6, that there is substantial evidence that some Trump votes were actually switched to Biden votes.

3.3 Analysis of Pennsylvania Absentee Ballots

The Pennsylvania absentee ballot count started at 785,473 and 319,741 ballots were added at 39 hours after the start of the data record. The Biden fraction among absentee ballots as a function of time is shown in Figure (5). This plot shows some oddities in that the Biden fraction fluctuates with large deviations.

In Figure (6) we see the initial Biden percentage compared with the Biden percentage of the added ballots over the first 39 hours. The added ballots have a Biden percentage of around 83%, while the initial statistics were at 78%. This is a very large jump for such a large sample size and seems very unlikely. Indeed the probability that the fraud model is correct is 100%, up to the precision of double floating point arithmetic.

If we just examine the initial large batch of votes among the absentee ballots, we see an unexplained jump of 5% for Biden. Although it is likely that most of the fraud, if any, occurred earlier in the vote count, just this batch of ballots suggests that approximately 72668 Biden ballots are fraudulent. If we presume that the votes were stolen from Trumps votes, then 15987 Biden ballots are fraudulent and should be added to Trump's total.

4 Analysis of Milwaukee County in Wisconsin

We now switch our analysis to a data set that contains precinct data for Milwaukee county. The data was obtained from the twitter account of @shylockh, who derived his sources from the New York Times and in some cases from

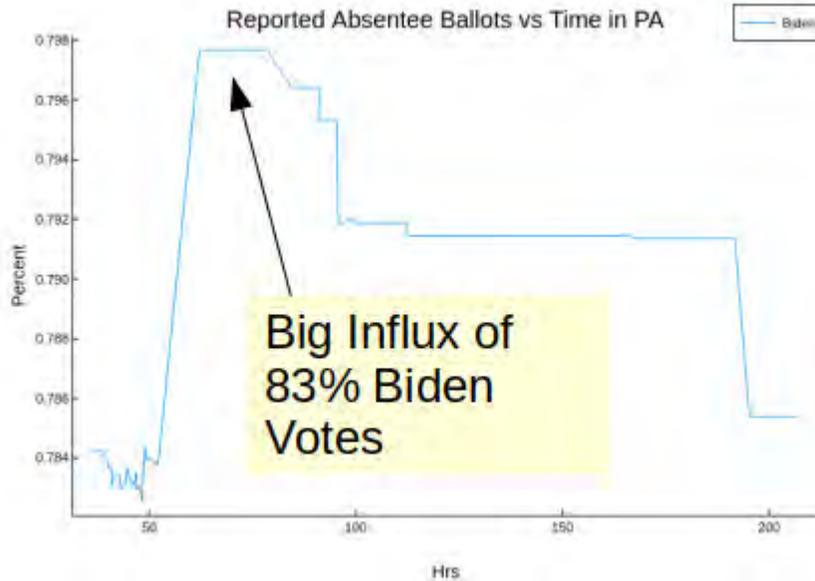


Figure 5: Pennsylvania Absentee Ballots vs Time: (Biden Fraction)

the unofficial precinct reports from the Wisconsin elections commission website. We examine vote percentages for ballots added between Wednesday morning, 11/04/2020 and Thursday night 11/05/2020.

This data set gives the total vote count by party affiliation. Because the data set is confined to Milwaukee, we can assume that the statistics should not be time varying. The voting pool here is highly partisan in favor of democrats and we don't expect any significant difference in the voting percentage, especially since a large number of absentee ballots were already counted by Wednesday morning.

4.1 Analysis of Milwaukee County Democrat results

The percentage of democrat voters increases by 15% among the ballots added on Wednesday and Thursday. On Wednesday morning Milwaukee had received 165,776 ballots. By Thursday evening 458,935 ballots were received, adding 293,159 ballots.

In Figure 7 we see the large deviation in democrat percentage between the Wednesday morning and those added by Thursday evening. This too causes the posterior probability of the fraud model to be 100% to machine precision.

Assuming that there was fraud, we estimate that 105,639 fraudulent Biden ballots were added between Wednesday and Thursday of 11/05/2020 in Milwaukee alone. However as we shall see below, many of these votes may well have been switched from Trump to Biden, which would also give Trump an additional

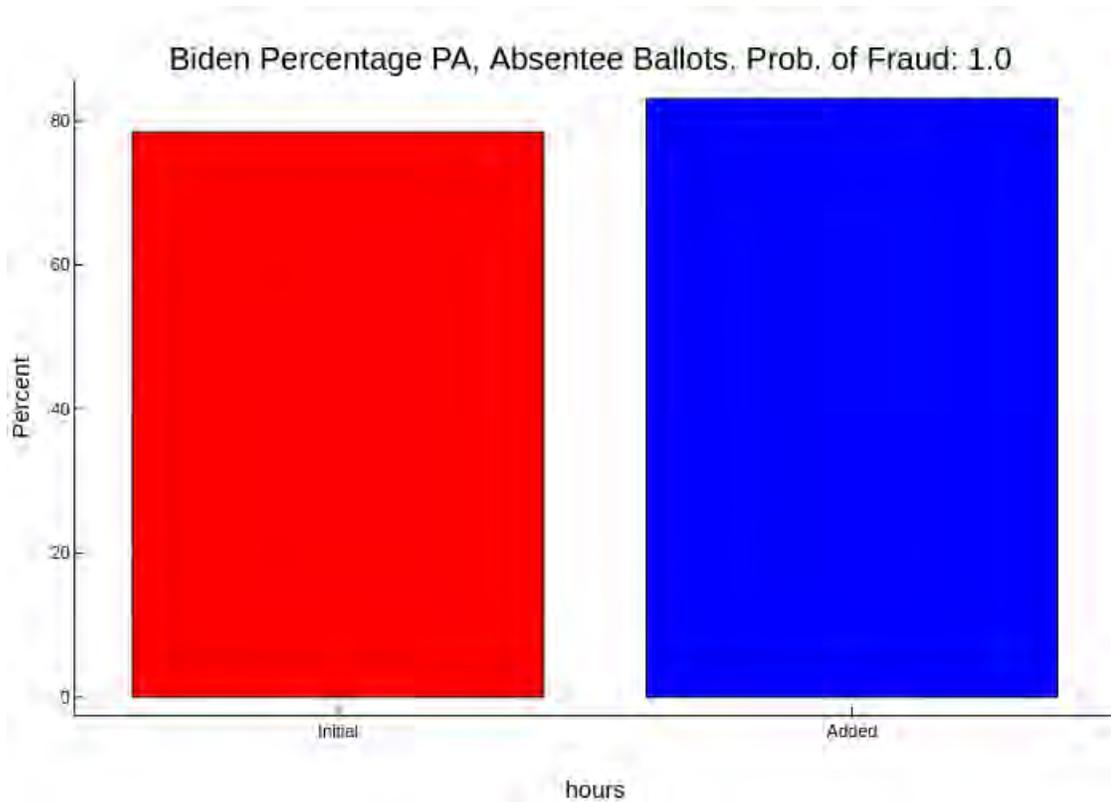


Figure 6: Before and After Biden Fraction in Pennsylvania

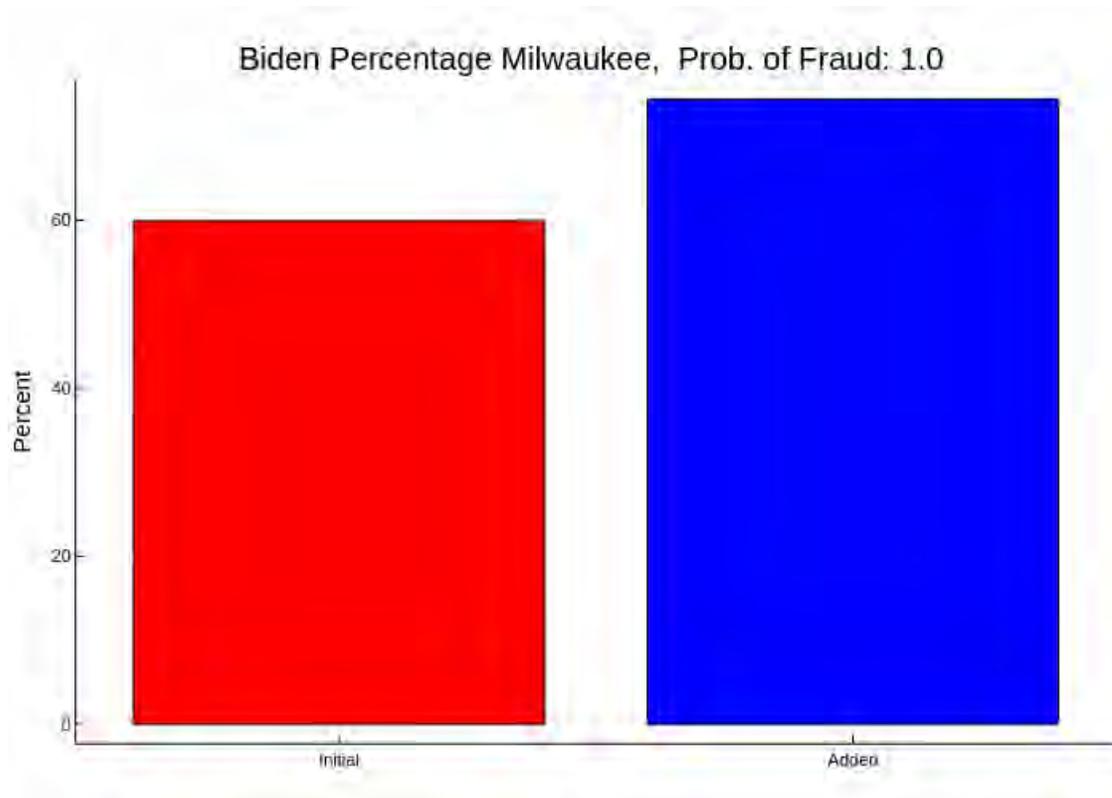


Figure 7: Before and After Democrat Fraction in Milwaukee

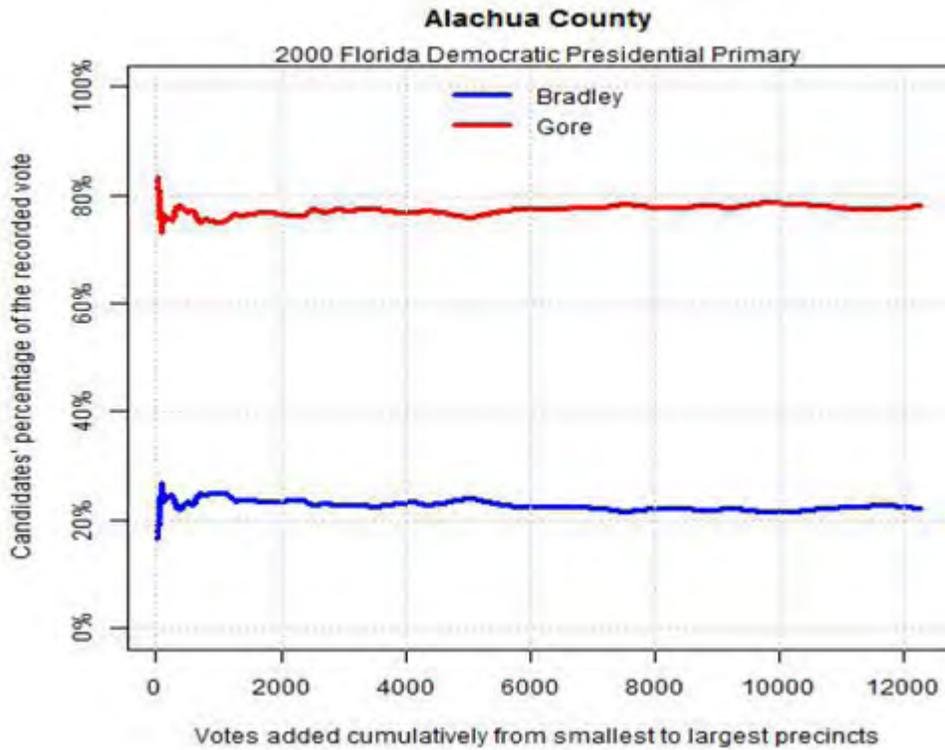


Figure 8: Baseline Cumulative Fractions Sorted by Precinct Size

42365 votes and remove 42365 votes from Biden.

4.2 Candidate Percentages Sorted by Ward Size

Another useful tool for evaluating fraud is to look at the cumulative vote percentages sorted by an independent input factor. An easy factor to use is ward or precinct size. This concept was used throughout the report on voter irregularities in [2]. In that report there was an anomalous dependency on precinct size in many of the 2016 primary elections. The larger precincts had introduced the use of voting machines. But one could also theorize the opportunity for cheaters to cheat in small precincts, where there may be less oversight.

Normally we would expect the cumulative vote percentage to converge to an asymptote, and bounce around the mean until convergence. An example of this can be found from the 2000 Florida Democratic presidential primary between Gore and Bradley. This is shown in Figure 8, and is taken from [2].

However when one sorts the Milwaukee, Thursday night data, by precinct

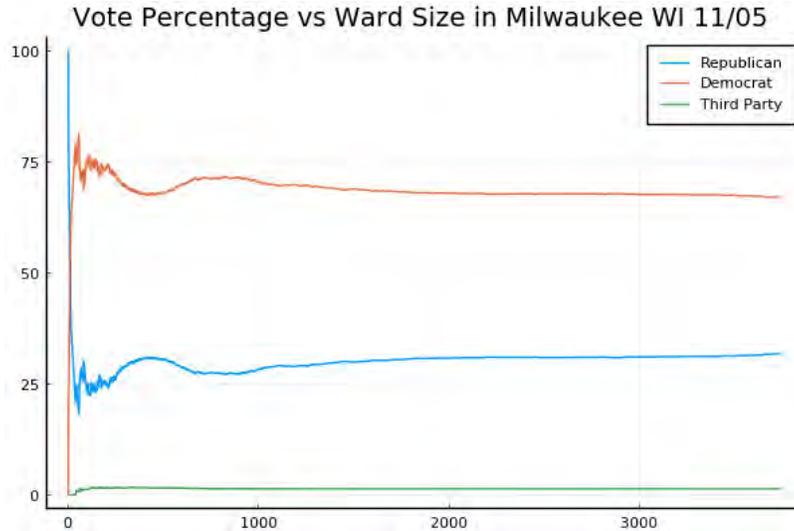


Figure 9: Milwaukee Democrat Ballots Percentage vs Ward Size

size, you will see trendlines that do not converge to an asymptote, as shown in Figure 9. It appears that smaller precincts almost uniformly have higher Democrat percentages. There is no obvious reason for this. It was certainly not seen in the control case in Figure 8. Furthermore the third party percentages quickly converge to their asymptote as would be expected in a fair election. One possible model for this would be vote switching from Trump to Biden, which would show up more strongly in the smaller precincts.

5 Analysis of Third Party Vote Count

Third party voters offer another way to examine a possible fraud mechanism. Votes could either be switched from third party candidates to the cheater, or fraudulent ballots that are added to benefit the cheater, may not include third party choices. For the control example, we look at absentee ballots in the state of Massachusetts. In Massachusetts the initial absentee ballot count was 117,618, and the number of added absentee ballots is 10,281.

The reported 3rd party percentage of absentee ballots vs time in Massachusetts is shown in Figure 10 and the comparison of the initial and added 3rd party ballots in MA is shown in Figure 11. There is only a small change in party preference, relative to the size of the added ballots. Therefore the probability of the fraud model is only 22%.

When we look at the total 3rd party percentages in Milwaukee, between Wednesday morning and Thursday night, we see a significant drop from 1.9 percent to 1.4% for the newly added ballots. But this is among 293,159 added

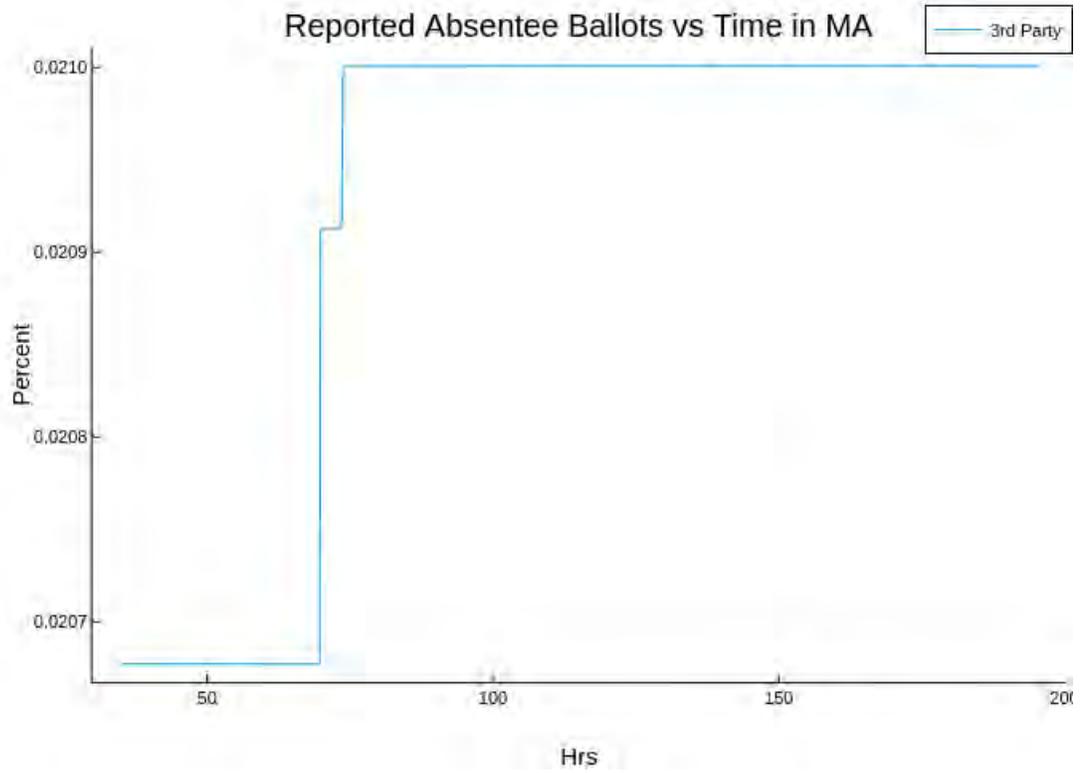


Figure 10: MA 3rd Party Absentee Votes vs Time

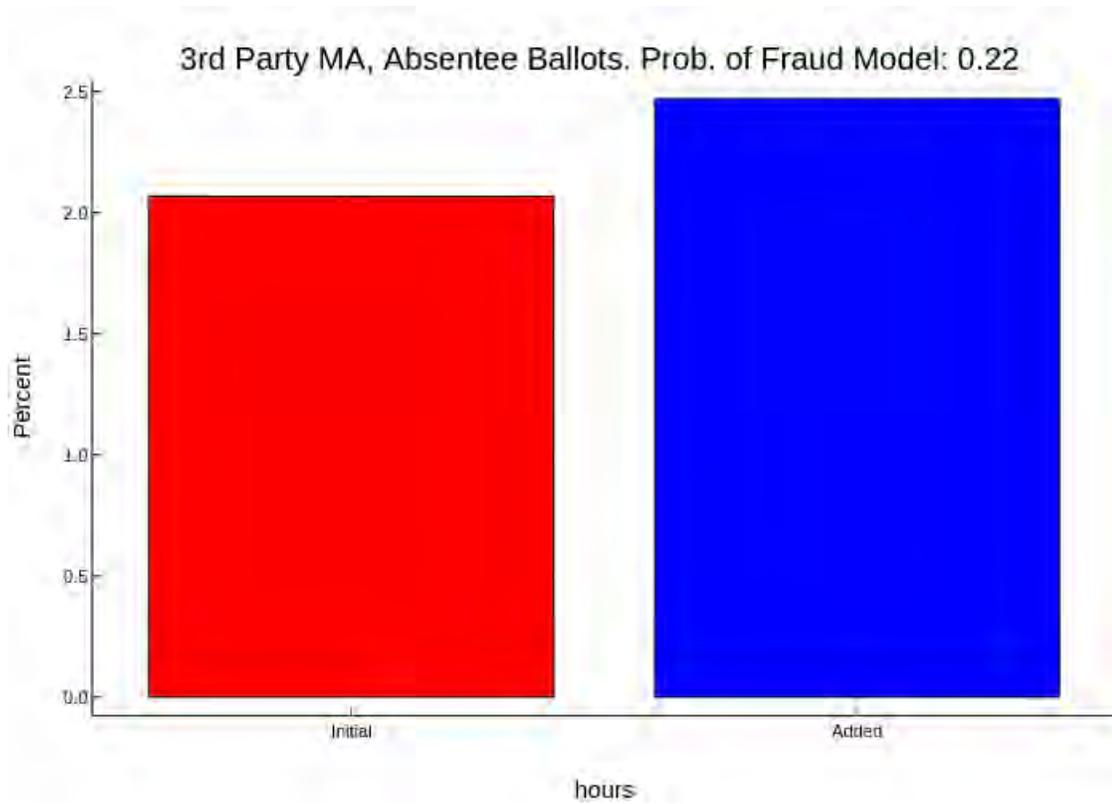


Figure 11: MA 3rd Party Percentage Initial and Added

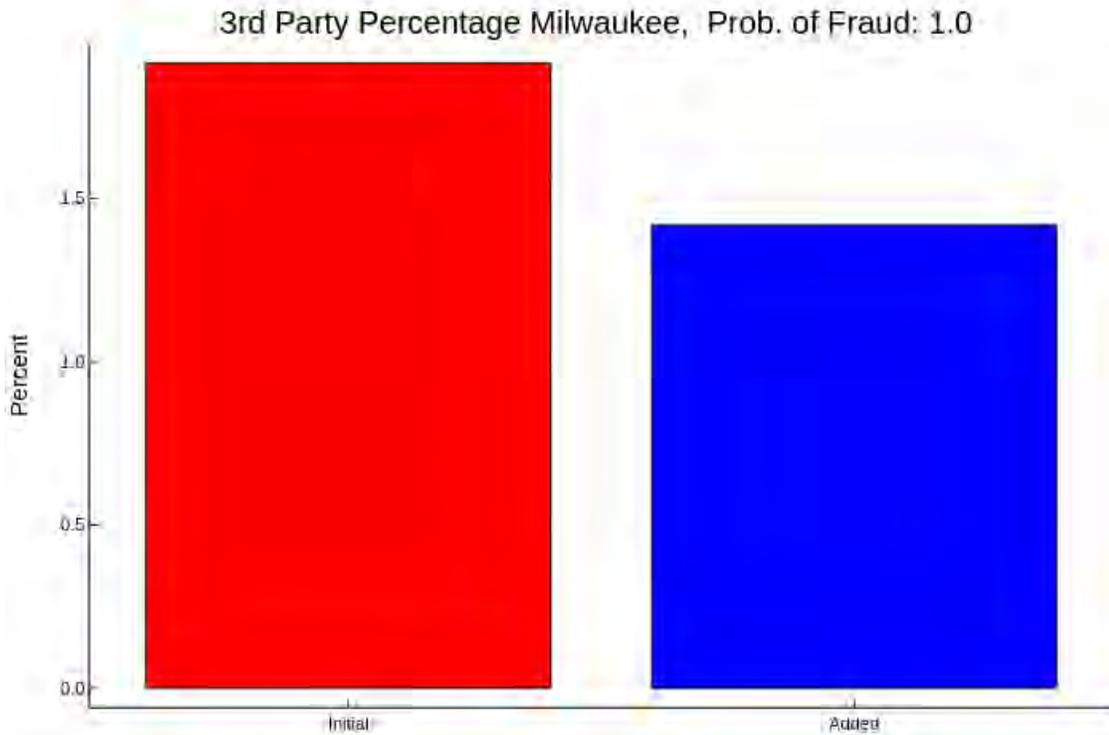


Figure 12: Milwaukee 3rd Party Percentages between Wednesday and Added

ballots. This is illustrated in Figure 12. Again in this case the fraud model has a posterior probability of 100% to machine precision.

6 Analysis of Fulton and DeKalb Counties in Georgia

We perform a precinct level analysis of Fulton and DeKalb counties in Georgia based on an aggregate data set likely culled from the New York Times. The Fulton data was collected on 11/08/2020 and the DeKalb data was collected on 11/09/2020. As in Milwaukee we look at the cumulative vote percentages as a function of precinct size. A plot of this for DeKalb county is shown in Figure 13.

Although there are somewhat concerning trendlines in the beginning, after the size 600 precinct mark, thereafter the overall picture is what one would expect of an election where the voter preferences are not dependent on precinct size. Both DeKalb and Fulton counties are in predominantly urban Atlanta,

Absentee Vote Percentage vs Precinct Size in DeKalb GA 11/0

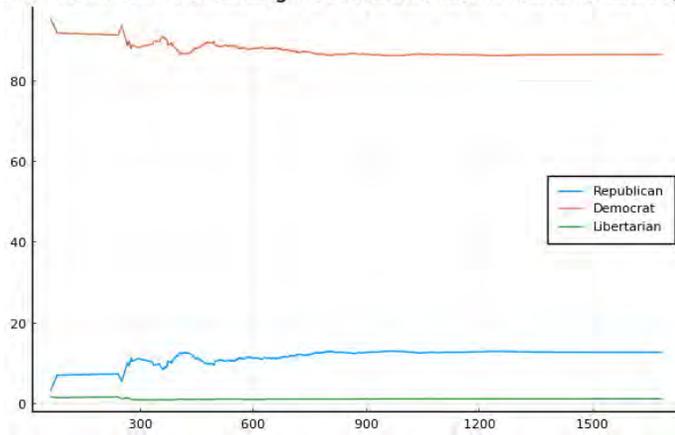


Figure 13: Dekalb County Absentee Ballots: Percentages vs Precinct Size

neighbor one another, and have similar voting preferences across precincts. DeKalb county is still suspect, however, due to the irregularities observed prior to the Ward 600 mark.

A different story emerges when we plot the absentee vote percentages for Fulton county as a function of precinct size, as can be seen in Figure 14. Here the trendlines for the Democrat and Republican percentages are quite pronounced, amounting to a difference of 8 percent from the halfway mark.

We divide the Fulton county data into a group of smaller precincts and larger precincts. One group has precincts less than 308 and another larger than 308. The total absentee ballots for the small group is 24,575, and the large group is 120,029. The small group has a Democrat percentage of 85% and the large group has a percentage of 77%, for a change of 8%. The fraud model is preferred in this scenario again with probability of 100% to machine precision.

One might presume that small precincts generally favor Democrats over large precincts, biasing the results. However take a closer look at the Libertarian party results in Fulton county in Figure 15. The percentages are exactly what we would expect if there were no bias in precinct size. The percentages bounce around a mean, not trending in any direction.

So if there were a bias favoring the democrats in small precincts, we would expect that to effect both the Republican and Libertarian totals. However it appears to only effect Republican totals, as if the Republican ballots were switched over to Democrat in a higher percentage in the smaller precincts. Indeed if a fixed number of ballots are switched in each district, it would have a larger effect in the smaller districts and then show up as trend lines in these percentage plots. At a minimum the data suggests a statistical anomaly that is not normally present in a fair election.

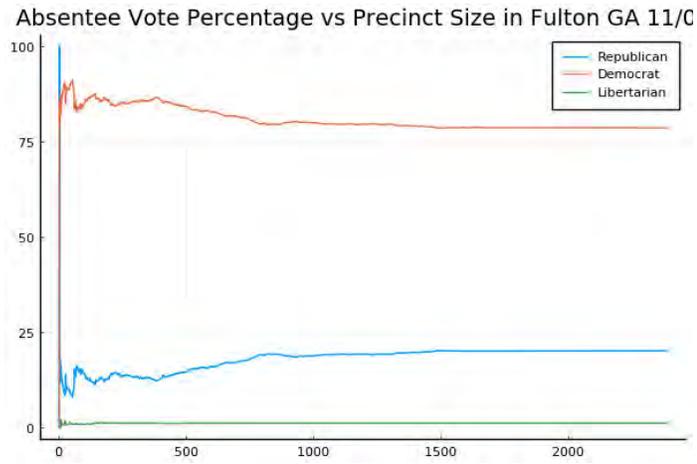


Figure 14: Fulton County Absentee Ballots: Percentages vs Precinct Size

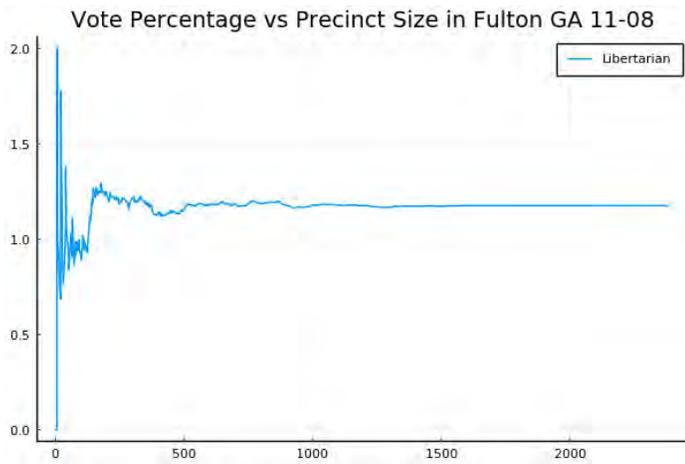


Figure 15: Fulton County Absentee Ballots: Libertarian Percentage vs Precinct Size

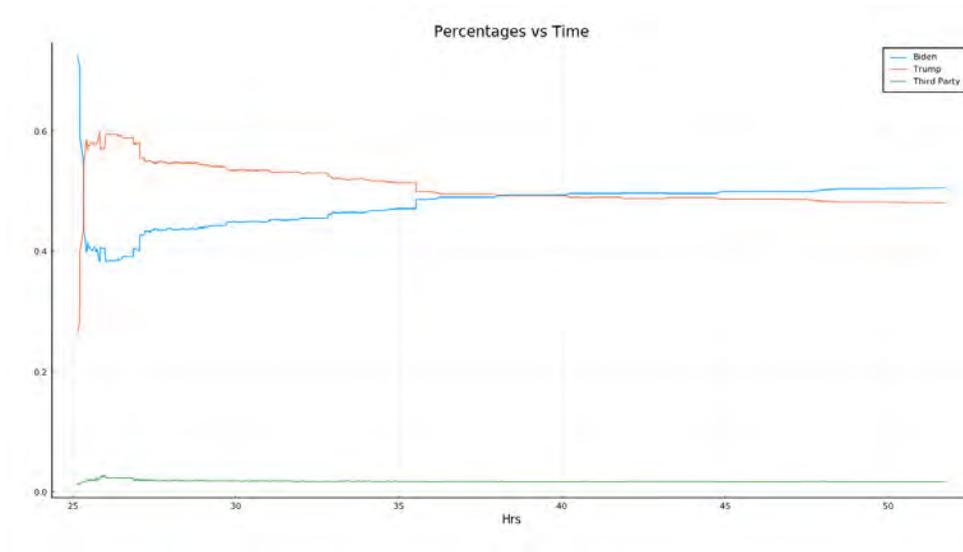


Figure 16: Michigan Vote Percentage vs Time

7 Michigan Analysis

We now do a time series analysis for Michigan. The data was culled from Edison Research. We first show, Trump, Biden and 3rd party voting percentages vs hours after the start of the election in Figure 16. The third party votes shows the proper convergence to an asymptote that we would expect from the law of large numbers. However the Trump and Biden percentages are vastly different. You can see large discrete jumps in the percentages as very large Biden ballot dumps occur over time. You also see that the Biden percentages are mostly always increasing after hour 27, which is statistically unlikely in a fair election.

Note also that almost a million of the ballots are received by hour 27, and we use this as our starting point. At that point we have a total of 970,119 votes cast. At the end of 167 hours we have 5,531,222 votes cast. At our initial point the Biden percentage is 38%, but the new ballots have a Biden percentage totaling 53% as seen in Figure 17. The fraud model has posterior likelihood of 100% to machine precision.

For Michigan we compute the estimated amount of fraudulent Biden ballots conservatively, assuming that the 50.5 percent seen at the end of the count should have been the correct percentage among the newly added ballots. From this and (4) we obtain an estimate of 237,140 fraudulent votes added for Biden.

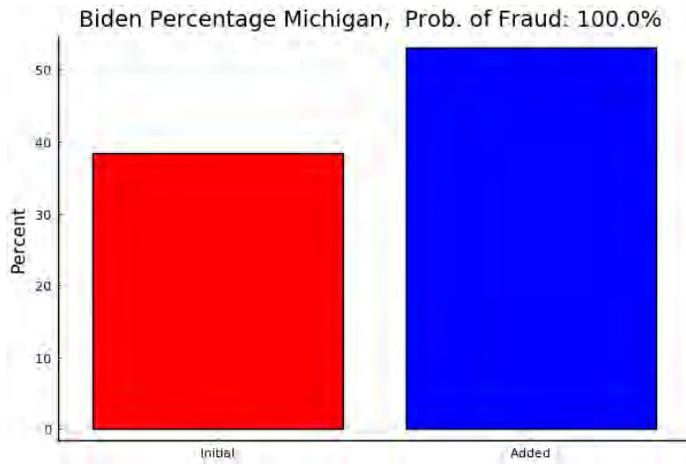


Figure 17: Biden Percentage Before and Added

References

- [1] Peter Klimek, Yuri Yegorov, Rudolf Hanel, and Stefan Thurner. Statistical detection of systematic election irregularities. [2, 2.1](#)
- [2] lulu Fries'dat and Anselmo Sampietro. An electoral system in crisis. <http://www.electoralsystemincrisis.org/>. [4.2](#)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

Place an "X" in the appropriate box (required): Green Bay Division Milwaukee Division

I. (a) PLAINTIFFS WILLIAM FEEHAN, DERRICK VAN ORDEN (b) County of Residence of First Listed Plaintiff <u>LaCrosse</u> <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i> (c) Attorneys (Firm Name, Address, and Telephone Number) See Attachment	DEFENDANTS WISCONSIN ELECTIONS COMMISSION, See Attachment County of Residence of First Listed Defendant <u>Dane</u> <i>(IN U.S. PLAINTIFF CASES ONLY)</i> NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. Attorneys <i>(If Known)</i>
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II. BASIS OF JURISDICTION <i>(Place an "X" in One Box Only)</i> <input type="checkbox"/> 1 U.S. Government Plaintiff <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i> <input type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i>	III. CITIZENSHIP OF PRINCIPAL PARTIES <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i> <i>(For Diversity Cases Only)</i> <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:33%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 1</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input checked="" type="checkbox"/> 1	<input checked="" type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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IV. NATURE OF SUIT *(Place an "X" in One Box Only)* Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

V. ORIGIN *(Place an "X" in One Box Only)*

<input type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from Another District <i>(specify)</i>	<input type="checkbox"/> 6 Multidistrict Litigation - Transfer	<input type="checkbox"/> 8 Multidistrict Litigation - Direct File
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VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity):*
42 U.S.C. s. 1983 Seeking Declaratory and Injunctive Relief

Brief description of cause:
Denial of Voting Rights

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ _____

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY *(See instructions):*

JUDGE _____ DOCKET NUMBER _____

DATE: **11/30/2020** SIGNATURE OF ATTORNEY OF RECORD: **Michael D. Dean (see attachment)**

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

Declaration of Russell James Ramsland, Jr.

1. My name is Russell James Ramsland, Jr., and I am a resident of Dallas County, Texas. I make this declaration pursuant to 28 USC sec 1746. I am over 18 years of age. I hold an MBA from Harvard University, and a political science degree from Duke University. I have worked with the National Aeronautics and Space Administration (NASA) and the Massachusetts Institute of Technology (MIT), among other organizations, and have run businesses all over the world, many of which are highly technical in nature. I have served on technical government panels.
2. I am part of the management team of Allied Security Operations Group, LLC, (ASOG). ASOG is a group of globally engaged professionals who come from various disciplines to include Department of Defense, Secret Service, Department of Homeland Security, and the Central Intelligence Agency. It provides a range of security services, but has a particular emphasis on cybersecurity, open source investigation and penetration testing of networks. We employ a wide variety of cyber and cyber forensic analysts. We have patents pending in a variety of applications from novel network security applications to SCADA (Supervisory Control and Data Acquisition) protection and safe browsing solutions for the dark and deep web. For this report, I have relied on these experts and resources.
3. In November 2018, ASOG analyzed audit logs for the central tabulation server of the ES&S Election Management System (EMS) for the Dallas, Texas, General Election of 2018. Our team was surprised at the enormous number of error messages that should not have been there. They numbered in the thousands, and the operator ignored and overrode all of them. This led to various legal challenges in that election, and we provided evidence and analysis in some of them.
4. As a result, ASOG initiated an 18-month study into the major EMS providers in the United States, among which is Election Systems and Software ("ES&S") that provides EMS services for Wisconsin. We did thorough background research of the literature and discovered there is confirmed evidence from both Democrat and Republican stakeholders in the vulnerability of ES&S. Next, we began doing passive penetration testing into the vulnerabilities described in the literature and confirmed for ourselves that in many cases, past vulnerabilities already identified were still left open to exploit in the November 2020 elections. We also noticed a striking similarity between the approach to software and EMS systems of ES&S and Dominion. This was logical since they share a common ancestry in the Diebold voting system.
5. Over the past three decades, almost all of the states have shifted from a relatively low-technology format to a high-technology format that relies heavily on a handful of private services companies. These private companies supply the hardware and software, often handle voter registrations, hold the voter records, partially manage the elections, program counting the votes and report the outcomes. Wisconsin is one of those states.

6. These systems contain a large number of known vulnerabilities to hacking and tampering, both when voters express their voting intention by marking an electronic ballot using ballot marking devices (BMDs), and at the back end where the votes are stored, tabulated, and reported by election officials. These vulnerabilities are well known, and experts in the field have written extensively about them.. This is not surprising as there are no federal standards for security in voting system software. EAC 2.0 was to be written to address this issue, but was never done.

7. Below is a screenshot from the ES&S Security Test Report Electionware 5.2.1.0 – 8/28/17 – Freeman, Craft, McGregor Group. It shows an incredible number of vulnerabilities in the system by which inside and external threats can manipulate the outcomes in a variety of ways.

Electionware Servers

Missing Operating System Patches	
Critical	17
Important	49
Moderate	2
Unrated	8

SCAP Misconfigurations	
Windows 2008 R2 STIG ³	46
Firewall STIG Configuration	3
.NET Framework 4 STIG Configuration	2
Internet Explorer 9 STIG Configuration	13

Electionware Clients

Missing Operating System Patches	
Critical	24
Important	51
Moderate	1
Unrated	9

SCAP Misconfigurations	
Windows 7 STIG	51
Firewall STIG Configuration	3
.NET Framework 4 STIG Configuration	2
Internet Explorer 9 STIG Configuration	3
Windows 7 USGCB ⁴ Configuration	45
Firewall USGCB Configuration	8

Screenshot

Recently ES&S moved many of its systems into the cloud behind cloudflare, but ASOG determined that this protection can still be easily circumvented by gaining access through its FTP site ESSVotes.

7. Election Systems and Software (“ES&S”) is a privately held company that provides election technologies and services to government jurisdictions. Almost all the counties of Wisconsin use the ES&S Election Management System with the exception of Sheboygan County. ES&S systems have options to be an electronic, paperless voting system with no permanent record of the voter’s choices, or a paper ballot-based system or hybrid of those two.

9. The overwhelming vulnerabilities of the ES&S system were on full display in Dallas County where ES&S is used, during the 2020 General Election. Data has been provided by the [Dallas County Election Department](#). The Voter Registration Database was received October 13, 2020 following an Open Records Request by The Dallas Examiner. The Mail-In and Early Voting Rosters were downloaded daily from [the County's computers](#). All Texas counties are required by law to publish daily voting rosters.

10. In that election, the voter records during early voting were captured each day for those voters who cast ballots either in person or by mail-in and catalogued using the hash totals to provide an absolute unique identifier. As required by [state law](#), the Dallas County Elections Department [published](#) the Daily Vote Roster for all voters who cast ballots during Absentee and In-Person Early Voting. The Roster contained the VoterID, name, address, type of vote, and various dates associated with every Early-Voting vote cast.

Dallas County claims its source of roster data was the In-Person Electronic Poll Books, and the Absentee Ballot scanners. Dallas County has claimed that entry into the Vote Roster can only be done by a registered Dallas County voter who either appeared In-Person or by Absentee Ballot. The computer that generated the roster was apparently hacked between October 7 and October 30. During that period tens of thousands of vote records were purged, added, or edited from the ES&S generated Vote Roster.

Specifically, over this period, 56,974 voter records had their hash identifier changed, meaning the vote was tampered with after it was cast and recorded in the system. In most cases, this tampering took the form of purging the vote, and then re-constituting it in some form or fashion, but with a change in the hash total meaning the vote was somehow changed. Currently it appears 5,690 votes disappeared completely after voting in person. All in all, this translates into approximately 107,000 hacked votes in Dallas County alone for ES&S. Ten blocks of voters on Westminster Street in Highland Park had their votes purged and then some of them were selectively re-instated at a later date with changes. People who double voted were catalogued as well as dead people who voted, people with no VUID voted (approximately 800 of them), unregistered university students voted, and *people living abroad who claim a Dallas Residence for voting purposes, but who, in a spot check are unknown to the residences they list* in the ES&S system. A short list of them includes:

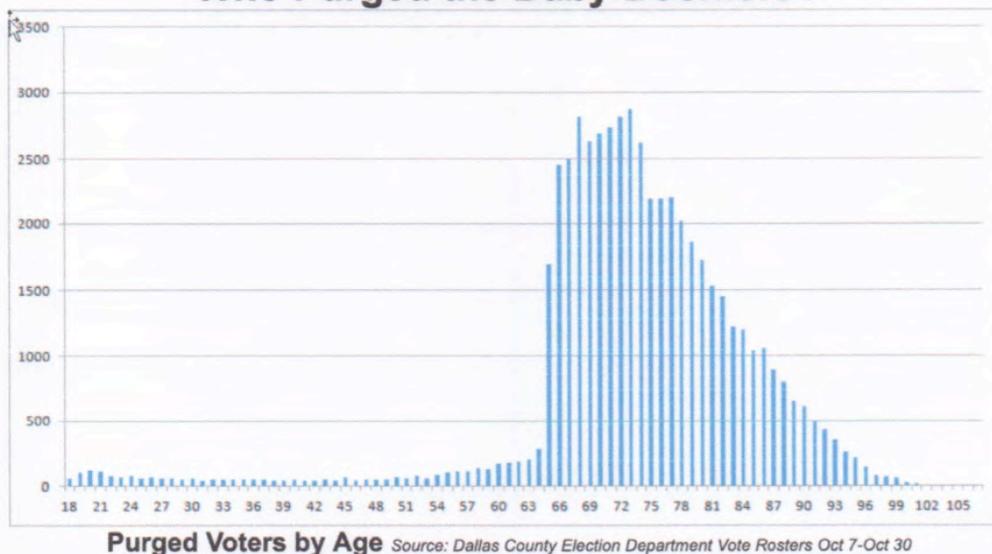
Country	Voters Who Voted
Mexico	118
Guatemala	9
Nicaragua	4
Kenya	18
Canada	154
Ireland	34
China	62
Australia	105

In plain English, at the instant before a voter casts a ballot there is a one-to-one relationship between the voter and their ballot as well as a one-to-one association between the voter and their votes.

At the instant that ballot is cast, the one-to-one relationship between the voter and ballot still exist, but the relationship between the voter and their votes is gone. No one can know how they voted. The key security check on voting integrity is the absolute match between the number of voters in the Vote Roster and the number of ballots counted in that voting district or precinct. If these numbers do not match, either physical ballots were added or removed from the Ballot Counter or "voters" were added or removed from the Vote Roster. In either case, the election has been compromised and the election is nothing more than a lottery. With tens of thousands of Vote Roster entries purged and other tens of thousand of entries apparently created out of thin air, using the ES&S EMS system, Dallas County Elections Department is definitely in the lottery business.

11. Equally troubling with the ES&S System is the apparent ease of targeting within the system of certain groups for purging. In Dallas, over 92% of PURGED In-Person and Absentee voters were over 65. This is statistically impossible and makes clear the system is easily manipulated by inside or outside actors.

Who Purged the Baby Boomers?

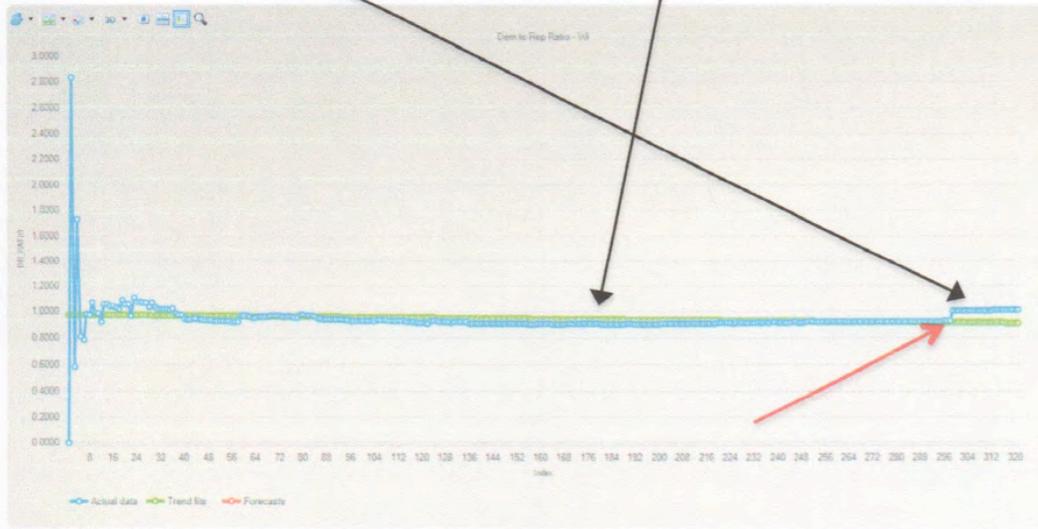


12. My colleagues and I at ASOG have studied the information that is publicly available concerning the November 3, 2020, election results from Wisconsin. Based on the significant anomalies and red flags that we have observed, I believe to a reasonable degree of professional certainty that election results have been

manipulated within the ES&S system in Wisconsin. We list below a few of the red flags that our team has uncovered.

13. Where ES&S is concerned, a statistically unlikely event (red arrow) occurred in the Wisconsin General Election at 09:42:30 Z (3:42 AM local) on 11/4/2020 according to Edison data reported to the NYT. For this analysis we focused on the key ratio of the cumulative Democrat (Biden) votes divided by the cumulative Republican (Trump) votes.

1. A ratio greater than 1.00 is an indicator of Democrat victory
2. A ratio less than 1.00 is an indicator of Republican victory
3. The time series plot shows the trend over time of the cumulative votes.
4. The trend analysis shows the time series but adds a statistically estimated trend line (in green)
5. Where anomalies are observed, the record is pulled out and a proportion test included that tests the probability that that batch of votes was drawn at random from the population of that state, based on the final counts.
6. Randomization is a reasonable assumption because the mail system acts as a randomizer as it mixes the ballots, and the later votes are the mail ballots.
7. The event outline below shifted what had been a settled, unarguable D/R ratio (cumulative to this point) of .912. Suddenly, this event occurs and is of such magnitude it shifts the entire election ratio to 1.0123.



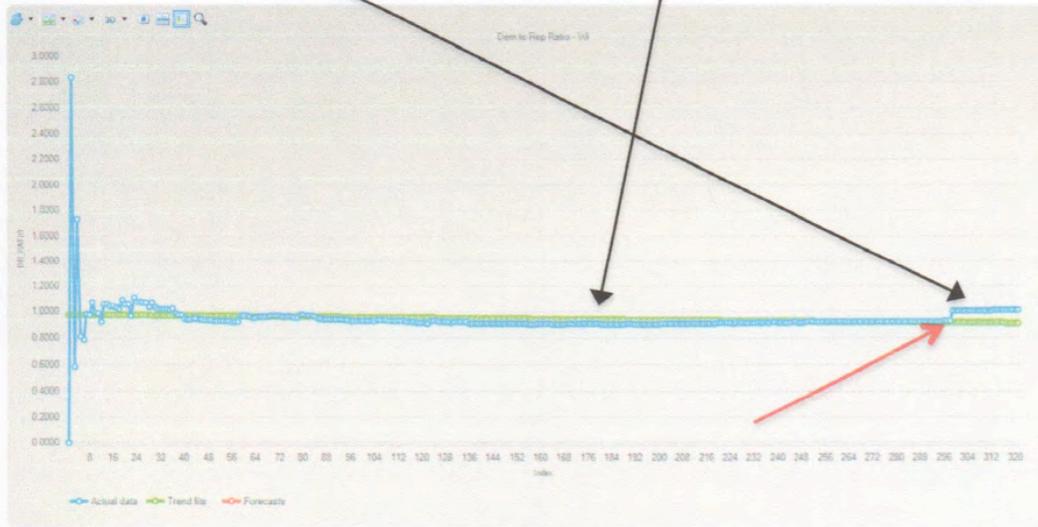
Preview Record

RECNUM	STATE	TIMESTAMP	VOTES	EEVP	TRUMPD	BIDENI	TRUMP_CUM	BIDEN_CUM	DATE	TIME	DR_RATIO	D_VOTES	R_VOTES	LOG_D	LOG_R
1	WI	2020-11-04T09:42:30Z	3186598	89	0.490	0.493	1561433	1570993	2020-11-04	09:42:20	1.0061	143379	25163	5.1565	4.4008

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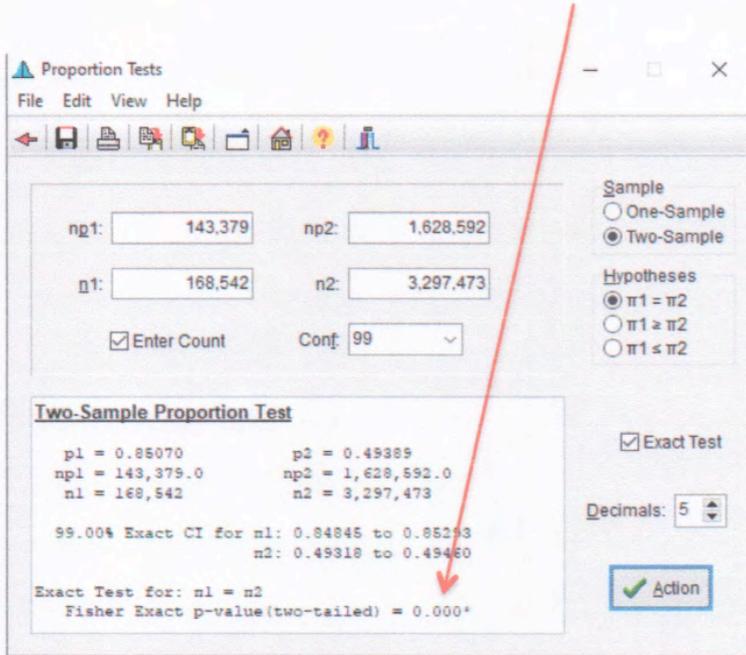
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P-Test (two-sample proportion test) shows that there is a 0.0% probability that this vote drop came from a random population of Wisconsin votes as shown in the outcome screenshot below. As shown above, Biden suddenly gets 143,379 votes out of 168,542 or 85%, which itself is outside any percentage before or after.

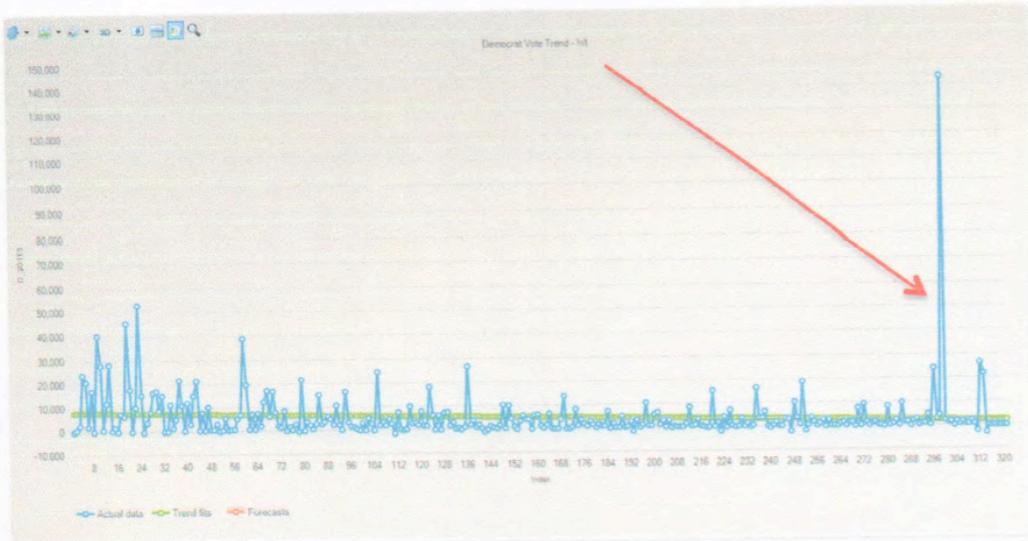


This event changed the final outcome. If this statistically impossible event were removed, the final outcome would be:

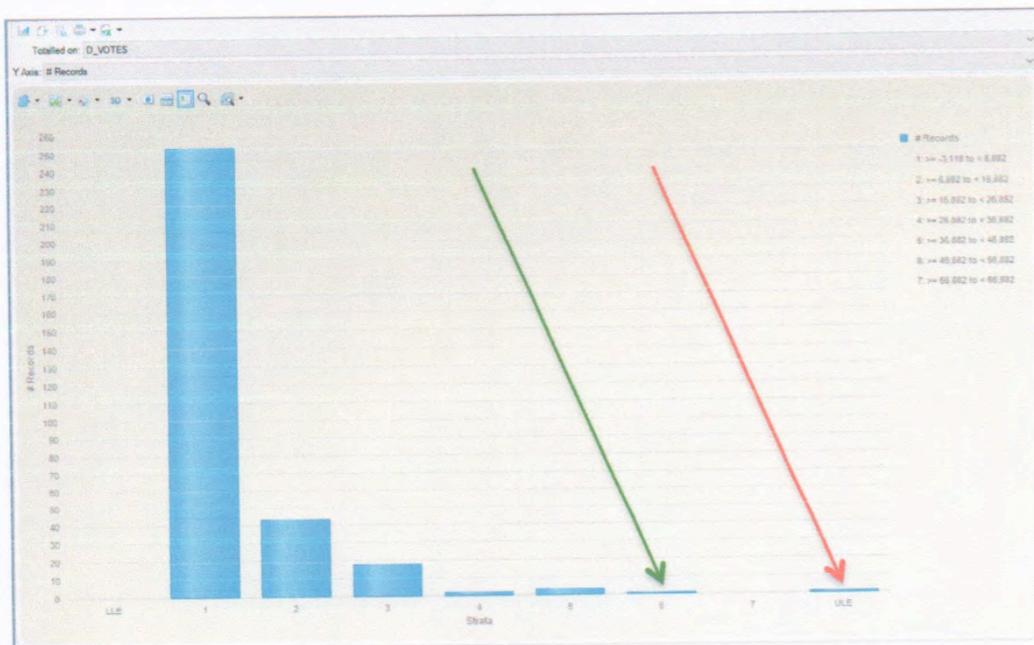
Biden: 1,485,573
 Trump: 1,584,004

This reveals a shift of approximately 119,430 votes from Biden to Trump would be expected were the election not tampered with.

14. A further red flag is raised when an analysis is done by voting batch. Here we can clearly see the magnitude of the Wisconsin batch dropped at 09:42:30Z on 11/4/2020 vastly exceeds every other Democrat vote total.



This batch shows up as an upper limit exception, meaning it is outside the realm of any expected outcome. A stratification bar chart (below) will indicate visually where the probabilities lie relevant to this event. At 6 standard deviations the chart shows very little chance of this occurring (green arrow). However, in this case, the event occurs at 12.93 standard deviations from the mean (red arrow), showing the probability even smaller at less than 3 in 1,000. Any fraud examiner would instantly flag this for a fraud audit and our Internal Auditor contractor did so immediately.



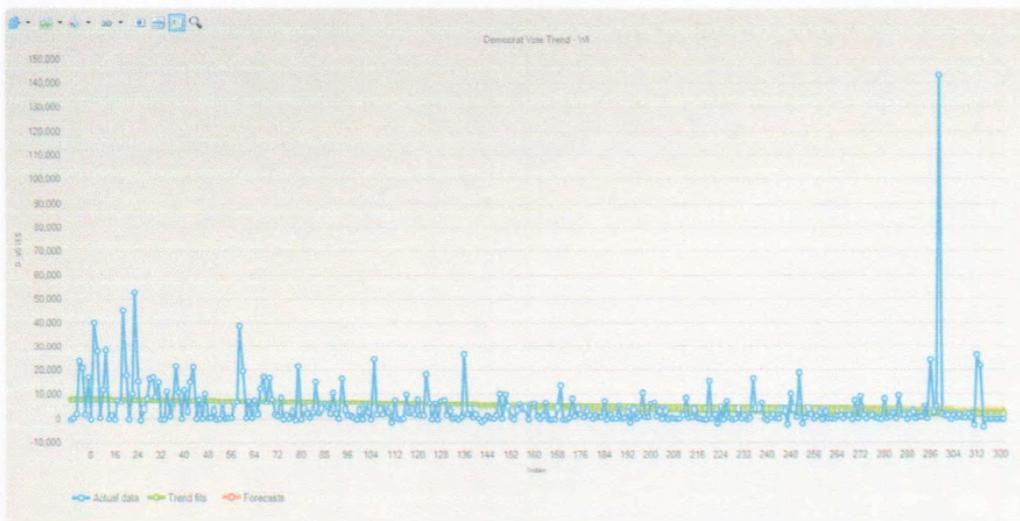
All of these are clear indications of fraud.

15. Another key red flag appears after inspecting voter turnout figures by county. Out of 72 counties, 69 of them exhibited voter turnout figures higher than 80%, a threshold generally considered to be the maximum expected. An amazing 59 of them were above 90%. When the public data votes were normalized to 80% turnout, the excess votes are at least 384,085 over the maximum that could be expected. A sample of this is shown in the table below.

County	Turnout %
Sheboygan County	270%
Shawano County	195%
Taylor County	95%
Marquette County	95%
Price County	94%
Juneau County	94%
Burnett County	94%
Rusk County	94%
Pepin County	94%
Waushara County	94%
Oconto County	94%
Washington County	93%
Kewaunee County	93%
Fond du Lac County	93%
Calumet County	93%
Buffalo County	93%
Lafayette County	93%
Green County	93%
Waupaca County	93%
Polk County	93%
Crawford County	93%
Green Lake County	93%
Dodge County	92%
Chippewa County	92%
Grant County	92%
Clark County	92%
Adams County	92%
Iowa County	92%
Ozaukee County	92%
Bayfield County	92%
Door County	92%
Richland County	92%
Monroe County	92%
Oneida County	92%
Manitowoc County	92%
Washburn County	92%

Trempealeau County	92%
Columbia County	92%
Lincoln County	92%
Waukesha County	92%
Florence County	92%
Barron County	92%
Vernon County	92%
Jefferson County	92%
Langlade County	92%
Outagamie County	91%
Wood County	91%
Marathon County	91%
Iron County	91%
Dunn County	91%
Jackson County	90%
Walworth County	90%
Douglas County	90%
Portage County	90%
Winnebago County	90%
Vilas County	90%
Pierce County	90%
Marinette County	90%
Ashland County	90%

15. Returning to the spike chart presented earlier, a time series crossed with a location specific analysis would determine whether the equipment on hand at any location would have even been capable of processing this many votes in the time represented. In Michigan, we have already observed this phenomenon and the analysis made clear it was physically impossible for the equipment on hand to process this many votes in the time represented.



Preview Record

RECNUM	STATE	TIMESTAMP	VOTES	EEVP	TRUMPD	BIDENJ	TRUMP_CUM	BIDEN_CUM	DATE	TIME	DR_RATIO	D_VOTES	R_VOTES	LOG_D	LOG_R
1	8721 wisconsin	2020-11-04T09:42:20Z	3186598	89	0.490	0.493	1561433	1570993	2020-11-04	09:42:20	1.0061	143379	25163	5.1585	4.4008

This spike, cast largely for Biden, (143,379-Biden, 25,163-Trump) could easily be produced in the ES&S EMS control system by pre-loading batches of blank ballots in files such as Write-Ins or other adjudication-type files then casting them almost all for Biden using the Override Procedure (to cast Write-In, Blank, or Error ballots) that is available to the operator of the system.

16. ES&S uses Scytl via Clarity Elections to accomplish the actual tabulation. Scytl has in its source code the ability to use a common, additive electoral seat allocation algorithm (JSeats) in order to award points based on percentages that are input into the system by the operator in order to determine (or appoint) a winner, as opposed to simply counting votes. Various parameters, weighting percentages, etc. can be set up. Thus, the winner is selected based on "points" that the algorithm computes, not actual voter votes. Below is a screenshot

The screenshot shows the GitHub repository page for 'Scytl/jseats', which is a fork of 'pau-minoves/jseats'. The page includes navigation tabs for Code, Pull requests, Actions, Projects, Security, and Insights. The current branch is 'devel'. Below the branch information, there is a commit message: 'pau-minoves config method and rally serialization, complete CLI story'. A list of files is shown, including 'create-absolute-majority-result.params', 'load-config-and-do-dhondt-result.params', 'load-config-and-replace-tally-result.params', and 'tally.3.xml', each with a description: 'config method and rally serialization, complete CLI story'.

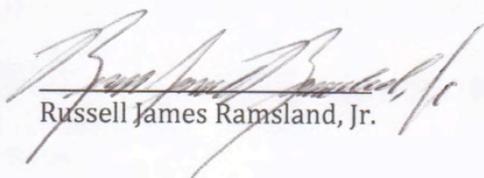
The fact that we observed raw vote data coming directly that includes decimal places establishes selection by an algorithm, and not individual voter's choice. Otherwise, votes would be solely represented as whole numbers (votes cannot possibly be added up and have decimal places reported). Below is an excerpt from the direct feed to news outlets showing actual calculated votes with decimals.

state	timestamp	eevp	trump	biden	TV	BV
wisconsin	2020-11-04T03:22:01Z	32	0.511	0.472	593876.535	548551.32
wisconsin	2020-11-04T03:24:08Z	33	0.511	0.472	601617.163	555701.176
wisconsin	2020-11-04T03:27:32Z	34	0.5	0.483	615621.5	594690.369

wisconsin	2020-11-04T03:28:57Z	35	0.5	0.483	635870.5	614250.903
wisconsin	2020-11-04T03:30:09Z	35	0.5	0.483	636620.5	614975.403
wisconsin	2020-11-04T03:30:28Z	36	0.502	0.481	649562.9	622389.95
wisconsin	2020-11-04T03:30:52Z	36	0.503	0.481	651861.844	623350.988
wisconsin	2020-11-04T03:35:25Z	37	0.503	0.48	661114.026	630884.16

14. Based on the foregoing, I believe these statistical anomalies and impossibilities compels the conclusion to a reasonable degree of professional certainty that the vote count in Wisconsin, in particular for candidates for President, contain at least 119,430 (Para. 13) up to 384,085 (Para. 15) illegal votes that must be disregarded. In my opinion, it is not possible at this time to determine the true results of the Wisconsin vote for President of the United States.

I declare, under the penalty of perjury, that the forgoing is correct.


 Russell James Ramsland, Jr.

11/30/2020
 Date